

Exhibit C



SCOTT A. THOMPSON
Executive Director

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY

OFFICE OF
CITY MANAGER
SEP 23 2016
cc: SO, SC

MARY FALLIN
Governor

September 21, 2016

Steve Lewis, City Manager
City of Norman
P.O. Box 370, 201 West Gray St.
Norman, OK 73070

Re: TMDL Compliance Plan and Monitoring Plan for the City of Norman's portion of the Lake Thunderbird Watershed

Dear Mr. Lewis:

The Oklahoma Department of Environmental Quality (DEQ) received a copy of the Lake Thunderbird TMDL Compliance Plan and Monitoring Plan (the Plan) for City of Norman's portion of the Lake Thunderbird Watershed on November 5, 2015. This Plan was submitted to DEQ by the City of Norman (the City) in response to the "Lake Thunderbird TMDL Report for Nutrient, Turbidity, and Dissolved Oxygen." According to this Report, all municipal separate storm sewer system (MS4) cities located within the watershed of Lake Thunderbird were required to submit an approvable TMDL Compliance Plan and a Pollutant Monitoring and Tracking Program. DEQ also received additional information on later dates and a copy of the revised Plan on July 22, 2016. DEQ has reviewed your submittals and approves your Plan, which includes the following conditions:

1. In accordance with the approved Lake Thunderbird TMDL Report, the City was allocated to reduce 319.4 kg/day of total nitrogen, 60.1 kg/day of total phosphorus, and 31,596.1 kg/day of total suspended solids from stormwater discharges in the Lake Thunderbird watershed. These waste load allocations (WLAs) were determined based on the maximum daily load (MDL). However, the City used long term average (LTA) loading to calculate waste load allocations (WLAs) and the City's portion of load reduction for different pollutants in the Plan and described the approach to achieve these WLAs. The City agreed in July 22, 2016 letter to adopt WLAs as their load reduction target as required by the TMDL report. The City must prepare a revised TMDL Compliance Plan incorporating the WLAs as their target load reduction approach along with recommended structural and non-structural BMPs and implementation plan to ensure progress towards achieving the target load reduction within July 2031. This revised Plan must be submitted to DEQ no later than September 15, 2021.



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2. The City will be required to operate their stormwater programs throughout their entire corporate boundaries within the Lake Thunderbird watershed in order to comply with this TMDL.
3. The City must implement adequate structural and non-structural BMPs to achieve progress toward meeting the reduction goals established in the TMDL.
4. The City shall implement an effective BMP Tracking Program to keep track of all structural and non-structural BMPs incorporating all the pertinent information required by Appendix E of the Lake Thunderbird TMDL Report. The DEQ encourages the City to maintain an extensive project file for each structural BMP project installed (i.e., construction drawings, as-built survey, digital photos, inspection records, and maintenance agreement, etc.) and to develop a GIS-based BMP tracking system in order to schedule routine inspections and maintenance activities over time.
5. In order to track pollutant load reduction, the City will monitor in-stream water quality at 10 designated locations throughout the implementation period. The City proposed to collect water samples once per month throughout the Plan's implementation period. Samples shall be analyzed, at minimum, for total phosphorus, total nitrogen, and TSS. The City may analyze for any other pollutants as necessary. In addition, the City identified 14 major discharge points that will be sampled and analyzed for the aforementioned pollutants on a rotating basis (50% of discharge points each year). The monitoring program must be fully implemented by November 12, 2016.
6. All laboratory analyses required by the Lake Thunderbird TMDL report must be performed by a laboratory accredited by DEQ. Monitoring shall be conducted according to analytical, apparatus and materials, sample collection, preservation, handling, etc., procedures listed at 40 CFR Part 136. Amendments to 40 CFR Part 136 promulgated after the approval date of this Plan shall supersede these requirements as applicable. In-situ tests will not require any certification. However, analytical, apparatus and materials, sample collection, preservation, handling, etc., shall follow procedures listed at 40 CFR Part 136.
7. The Lake Thunderbird TMDL report requires an Annual TMDL Implementation Report incorporating the status and actions taken by the City to implement the Plan and monitoring program. The TMDL implementation report shall document relevant actions taken by the City that affect MS4 stormwater discharges within the watershed. This TMDL implementation report also shall identify the status of applicable TMDL implementation schedule milestones. The TMDL Implementation Report may be included in your annual MS4 report.
8. The Lake Thunderbird TMDL requires the City to evaluate compliance with the TMDL and progress toward achieving the WLAs and load reduction goals at each renewal of the MS4 permit or every five years, whichever comes first. You must submit this evaluation to DEQ as a report for our review and **approval**. Consideration will be given to:
 - Water quality data and results from the pollutant monitoring and tracking program

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- The status of achieving milestones and accomplishing items in the current compliance plan
- Any revisions that have been made to or proposed for the compliance plan
- Any proposed enhancements to the compliance plan for the next permit term

If sufficient progress is not demonstrated in this evaluation, you will be required to submit an updated compliance plan and implementation schedule within 6 months. Noncompliance may subject the permittee to enforcement action.

If you have any question regarding this letter or the Stormwater Program, please contact me at ismat.esrar@deq.ok.gov or (405) 702-8193.

Sincerely,



Ismat Esrar, P.E.
Municipal Discharge & Stormwater Permitting
Water Quality Division

MBM/PR/WTC/JL/MJ/IE

cc: Scott Sturtz, P.E., City Engineer, City of Norman