

# CITY OF GLENPOOL PHASE II MS4 ANNUAL REPORT

## FY 2025

REPORTING PERIOD -11/1/2024 TO 10/31/2025



PHASE II Municipal Separate Storm Sewer System (MS4) General Permit (OKR04)  
Authorization No OKR040047



City of Glenpool PHASE II MS4 Annual Report  
Reporting Period -11/1/2024 to 10/31/2025

PHASE II Municipal Separate Storm Sewer System (MS4)  
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## Table of Contents

|  |    |
|--|----|
| <i>General Permit OKR04 Phase II MS4 Annual Report Certification Statement</i> ..... | 3  |
| <i>1. Compliance Status</i> .....  | 4  |
| <i>1.1. Executive Summary</i> .....  | 4  |
| <i>1.2. BMP Implementation and Evaluation</i> .....                                  | 5  |
| <i>1.3. MCM Measurable Goals</i> .....   | 5  |
| <i>APPENDIX A: Supporting Documents for MCM 1</i> .....                              | 17 |
| <i>APPENDIX B: Supporting Documents for MCM 3</i> .....                              | 33 |
| <i>APPENDIX C: Supporting Documents for MCM 4</i> .....                              | 35 |

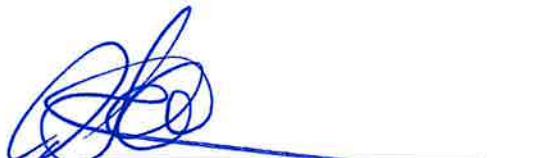
## General Permit OKR04 Phase II MS4 Annual Report Certification Statement

**Name of MS4 Permittee:** City of Glenpool

**OKR04 Permit Number:** OKR040047

The following certification statement is required by Part VII.H.4. of the OKR04 Permit. Signatory requirements are specified in Part VII.H.2. of the OKR04 Permit. For Permittee, the certification must be signed by either a principal executive officer, a ranking elected official, or a duly authorized representative. Refer to Part VII.H. of the OKR04 Permit for all signatory and certification requirements.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."



David Tillotson

City Manager

10/30/2025

Date

## 1. Compliance Status

### 1.1. Executive Summary

The Phase II MS4 Annual Report (AR) for the City of Glenpool (City) is submitted as required by Part VI.C. of the Oklahoma Department of Environmental Quality (DEQ) Phase II Municipal Separate Storm Sewer System (MS4) General Permit, OKR04, Authorization No. OKR040047, and covers the reporting period of November 1, 2024, through October 31, 2025. As part of these requirements, the City assessed permit compliance, including an evaluation of the appropriateness of Best Management Practices (BMPs), progress toward the goal of reducing discharge pollutants, and achievement of measurable goals for each Minimum Control Measure (MCM).

The City of Glenpool continued to successfully implement its Stormwater Management Program during the current reporting period, focusing on public education, pollution prevention, and regulatory compliance across all required Minimum Control Measures (MCMs). The City actively engaged residents, students, and developers through social media campaigns, community cleanup events, school programs, and civic outreach. Partnerships with organizations such as Blue Thumb helped deliver hands-on learning experiences and outreach efforts. Overall, public awareness of stormwater protection increased through consistent communication and multiple engagement platforms.

Staff training remained a key priority, with personnel participating in workshops, inter-agency training, and certification programs to enhance their ability to detect illicit discharges, enforce stormwater regulations, and manage construction runoff. Construction and development oversight was strong, supported by routine plan reviews, site inspections, and enforcement actions to ensure compliance with erosion control and water quality standards. The City's stormwater inspector issued five (5) Notices of Violations (NOVs) and one Stop Work Order (SWO) for noncompliance during the reporting period.

The City made significant progress with its Illicit Discharge Detection and Elimination (IDDE) program during the reporting period. City staff received hands-on training from the Stormwater Department of the neighboring City of Owasso to strengthen program implementation capacity. Field work for the program is scheduled for the 2025–2026 cycle and will include dry-weather outfall assessments and expanded GIS mapping. On July 30–31, 2025, representatives from the Environmental Protection Agency (EPA) and

the Oklahoma Department of Environmental Quality (ODEQ) visited the City of Glenpool to conduct a Compliance Evaluation Inspection (CEI). The purpose of the inspection was to review how well the City is meeting the requirements of its Small Municipal Separate Storm Sewer System (MS4) permit. The inspection team was led by Ms. Sharron Crayton from the EPA and Mr. Mark Thibodeau from the ODEQ. In alignment with transparency and public engagement objectives, all relevant documentation including the Stormwater Management Program (SWMP) and Notice of Intent (NOI) remains publicly accessible online.

Overall, Glenpool demonstrated strong commitment to environmental care, regulatory compliance, and community participation in stormwater protection efforts, with planned improvements on track to further enhance program effectiveness in the coming year.

## **1.2. BMP Implementation and Evaluation**

The City considers the current BMPs to be appropriate and effective during this reporting period. Evaluation of the BMPs is ongoing, and if any are found to be no longer effective or appropriate, the BMP will be amended, deleted, and/or replaced. An assessment of the BMPs currently being implemented by the City is presented in the tables in Section 1.3.

## **1.3. MCM Measurable Goals**

Progress in achieving the measurable goals for each BMP of the six MCMs is presented in the following tables. Supporting documentation for each MCM is attached in the Appendices.

| MCM 1: PUBLIC EDUCATION, OUTREACH AND INVOLVEMENT |   |                 |  |                   |   |                  |            |  |   |                          |
|---|---|-----------------|--|-------------------|---|------------------|------------|--|---|--------------------------|
| ID NO.  | PERMIT REQUIREMENTS   | TARGET AUDIENCE | ACTIVITY   | DELIVERY METHOD   | ANNUAL MEASURABLE GOAL  | START DATE       | SCHEDULE   | COMMENTS   | ASSESS THE APPROPRIATENESS OF THE BMP IN ACCORDANCE WITH PART VI.C.1.B  | PERMIT REQUIREMENTS MET? |
| 1.1   | Include education and involvement efforts for target audiences. (Part V.C.1.a.i). | Public          | Public Education (Residential Stormwater Pollution Prevention) | Social Media      | The City of Glenpool will conduct 4 public education activities per year, and 2 public involvement activities per year. | March 2025       | Monthly    | The City of Glenpool posted 8 stormwater campaigns on Facebook. The Campaigns started in March 2025 and have addressed topics such as pet waste, construction runoff, food waste in storm drains, illicit discharges, grass clippings, and fertilizing lawns effectively.  | Distributed stormwater messages to public via social media<br><b>Part V.C.1.b.iii</b><br><b>Part V.C.1.b.iv</b>                   | Yes                      |
|   |   | Public          | Public Education (Residential Stormwater Pollution Prevention) | Brochure Pamphlet | The City of Glenpool will conduct 4 public education activities per year, and 2 public involvement activities per year. | Already in place | 4 per year | All GCSA Brochures are posted on the City of Glenpool websites. Pamphlets and brochures were printed and placed at the City Hall.<br><br><a href="https://glenpoolonline.com/DocumentCenter/View/2056/GCSA-BROCHURES--ALL-16?bId=1">https://glenpoolonline.com/DocumentCenter/View/2056/GCSA-BROCHURES--ALL-16?bId=1</a> | Distributed stormwater messages to public via Brochure, Pamphlets and website<br><b>Part V.C.1.b.iii</b><br><b>Part V.C.1.b.v</b> | Yes                      |
|   |   | Public          | Public Education & Public Involvement                          | Civic Event       | The City of Glenpool will conduct 4 public education activities per year, and 2 public involvement activities per year. | Already in place | Annually   | A public education event was held at the City Hall in collaboration with Blue Thumb. This event displayed educational tools such as the stormwater model and other educational materials. The event was held on January 21, 2025.  | Held Civic Event at the City Hall<br><b>Part V.C.1.b.ii</b>   | Yes                      |

|     |   |        |   |                         |   |                  |               |  |   |     |
|-----|---|--------|---|-------------------------|---|------------------|---------------|--|---|-----|
|     |   | Public | Public Involvement (Cleanup Event)  | Volunteer Event         | The City of Glenpool will conduct 2 public involvement activities per year.   | Already in place | Once per year | The 2025 Community Cleanup took place on March 29 <sup>th</sup> , 2025. It was coordinated by 11 city staff and 1 council member. The event was held between the hours of 9:00 AM and 1:00 PM at the Glenpool High School Football Stadium parking lot.  | Organized a community clean-up event in collaboration with the M.E.T<br><b>Part V.C.1.b.vii</b>                                 | Yes |
|     |   | Public | Public Education & Public Involvement (General Stormwater Management Information)   | School Program          | The City of Glenpool will conduct 4 public education activities per year, and 2 public involvement activities per year.                   | Already in place | Once per year | Blue Thumb and the City of Glenpool hosted 30 six-graders on Arbor Day March 26, 2025. Students participated in educational sessions at City Hall on stormwater pollution and the impact of landscaping. Personnel from Blue Thumb exhibited an interactive stormwater model which was a fun way to help students learn about stormwater and water quality.  | Collaborated with Blue Thumb to provide public education and involvement programs.<br><br><b>Part V.C.1.b.iii</b>               | Yes |
| 1.2 | In coordination with MCM 3, promote, publicize, and facilitate the reporting of illicit discharges (Part V.C.1.a.ii.2.b). | Public | Public Education & Public Involvement (Illicit Discharge Detection and Elimination) | Website                 | Address complaints and concerns submitted by the public via the report-a-Stormwater violation feature on the City's website and by phone. | August 2025      | Continuous    | The report-a-stormwater violation feature of the City of Glenpool website allows complaints and concerns to be reported and submitted to the Engineering department for inspection, correction, remediation, etc. All illicit discharge related complaints were inspected/investigated during FY25. Documentation of potential illicit discharges and city response is kept by the Engineering Department. | Create opportunities for the public to participate in the implementation of stormwater controls<br><br><b>Part V.C.1.b.viii</b> | Yes |
| 1.3 | In coordination with MCM 3, conduct staff training to identify and report   | Staff  | Staff Training (Illicit Discharge Detection and Elimination)                        | Targeted Group Training | Train City Public Works staff annually to recognize and report illicit discharges.  | August 2025      | Once per year | A City of Glenpool Staff visited The Pretreatment & Stormwater Division of the City of Owasso to get trained in dry weather testing and illicit discharge detection. Training was held on 8/20/2025.   | Use stormwater educational materials developed locally or provided by EPA, states, MS4s and other organizations                 | Yes |

|     |  |            |                    |         |   |                  |            |  |  |     |
|-----|--|------------|--------------------|---------|---|------------------|------------|--|--|-----|
|     | stormwater illicit discharges (Part V.C.1.a.ii.2.c).   |            |                    |         |   |                  |            | <b>Part V.C.1.b.i</b>  |  |     |
| 1.4 | In coordination with MCM 4, implement an education program to involve local developers (Part V.C.1.a.ii.3.a).  | Developers | Construction Sites | Meeting | Contractor/developer are educated during preconstruction and post construction meetings   | Already in place | Continuous | <p>The City of Glenpool hosts Pre-construction/post-construction meetings held in person every Thursday at the City Hall. These meetings are for developers and contractors. Topics like permit requirements, SWP3 requirements, erosion control plans, BMP maintenance, erosion/sediment control, and other regulations are discussed. These meetings are jointly led by the Engineering Department and Development Services Department.</p> <p><b>Part V.C.1.b.v</b></p> | <p>Provide information to businesses on stormwater pollution prevention topics such as automobile maintenance, chemical storage and disposal, illicit discharges, erosion and sediment controls and promoting LID</p> <p><b>Part V.C.1.b.v</b></p> | Yes |
| 1.5 | In coordination with MCM 4, implement and enforce procedures for receipt and consideration of information submitted by the public (Part V.C.1.a.ii.3.b). | Public     | Construction Sites | Website | The City of Glenpool will address all complaints and concerns submitted by the public via the website, by phone, and through social media. The report-a-concern feature of the City of Glenpool website allows complaints and concerns to be reported and submitted to the proper department/division for inspection, correction, remediation, etc. All construction site related complaints were inspected/investigated during FY25. | Already in place | Continuous | <p>The City of Glenpool can receive information from the public via the website, by phone, and through social media. The report-a-concern feature of the City of Glenpool website allows complaints and concerns to be reported and submitted to the proper department/division for inspection, correction, remediation, etc. All construction site related complaints were inspected/investigated during FY25.</p> <p><b>Part V.C.1.b.vii</b></p>                         | <p>Create opportunities for the public to participate in the implementation of stormwater controls</p> <p><b>Part V.C.1.b.vii</b></p>  | Yes |

|     |  |            |   |                         |  |                  |               |  |  |     |
|-----|--|------------|---|-------------------------|--|------------------|---------------|--|--|-----|
|     |  |            |   |                         | inspection, correction, remediation, etc.  |                  |               |  |  |     |
| 1.6 | In coordination with MCM 4, conduct staff training to address requirements for inspection and enforcement of erosion and sediment control measures (Part V.C.1.a.ii.3.c).                                      | Staff      | Staff training                                | Targeted Group Training | Train Staff annually on inspection and enforcement of erosion and sediment control measures.   | Already in place | Once per year | 9/8/2025- The City of Glenpool's Stormwater Inspector took an EPA Construction general Inspector Training.   | Use stormwater educational materials developed locally or provided by EPA, states, MS4s and other organizations<br><br><b>Part V.C.1.b.i</b> | Yes |
| 1.7 | In coordination with MCM 5, implement an education and outreach program for developers and the public about project designs that minimize water quality impacts, including LID strategies (Part V.C.1.a.ii.4). | Developers | Public education for post-construction runoff | Website                 | The City of Glenpool will continue to look for educational opportunities for developers on the subject of LID strategies to promote water quality. | Already in place | Continuous    | The public and Developers are made aware of LID strategies via the City of Glenpool's website and preconstruction meetings. The Green Country Stormwater Alliance brochure is on the website for promotion of LID. | Use stormwater educational materials developed locally or provided by EPA, states, MS4s and other organizations<br><br><b>Part V.C.1.b.i</b> | Yes |

|      |  |        |   |                         |  |                  |               |  |  |     |
|------|--|--------|---|-------------------------|--|------------------|---------------|--|--|-----|
| 1.8  | In coordination with MCM 6, conduct staff training to prevent and reduce stormwater pollution from MS4 activities (Part V.C.1.a.ii.5).         | Staff  | Staff training                            | Targeted Group Training | Train City Public Works staff annually to implement BMPs to reduce stormwater pollution. | Already in place | Once per year | 7/16/2025 - The City of Glenpool's Stormwater Inspector attended the Oklahoma Floodplain Managers Association (OFMA) Stormwater Quality Technical Workshop in Oklahoma City and OFMA 2025 Annual Conference on September 22-24,2025. | Use stormwater educational materials developed locally or provided by EPA, states, MS4s and other organizations<br><b>Part V.C.1.b.i</b> | Yes |
| 1.9  | Include a process by which public comments on the SWMP are received and reviewed by the person(s) responsible for the SWMP (Part V.C.1.a.iii). | Public | Involvement in Development of SWMP        | Website                 | Initiate process for public to comment on updated SWMP.                                  | Already in place | Continuous    | Public comments can be made through the "report a concern" feature of the City of Glenpool website. These comments go to Engineering Department.   | Establish a citizen advisory group or utilize existing organizations to participate in the development, implementation and revision      | Yes |
| 1.10 | Comply with State and local public notice requirements (Part V.C.1.a.iv).  | Public | General Stormwater Management Information | Website                 | comply with DEQ standard for public notice requirements                                  | October 2025     | Continuous    | Publicized SWMP on the City of Glenpool Stormwater Management webpage.   | Distribute stormwater messages by using locally available methods.<br><b>Part V.C.1.b.ii</b>   | Yes |
| 1.11 | Make your records, including the NOI and SWMP, available to the public (Part V.C.1.a.v).   | Public | General Stormwater Management Information | Website                 | Publicize the SWMP and NOI on the City of Glenpool Stormwater Management webpage         | October 2025     | Continuous    | The City of Glenpool NOI and SWMP are on the City of Glenpool Stormwater webpage.  | Distribute stormwater messages by using locally available methods.<br><b>Part V.C.1.b.iii</b>  | Yes |

MCM 2: INDUSTRIAL STORMWATER RUNOFF CONTROL – The city of Glenpool is a Category two and is not subject to MCM 2

| MCM 3: ILLICIT DISCHARGE DETECTION AND ELIMINATION (IDDE) |   |                 |   |                     |  |                   |            |  |  |                          |
|---|---|-----------------|---|---------------------|--|-------------------|------------|--|--|--------------------------|
| ID NO.  | PERMIT REQUIREMENTS   | TARGET AUDIENCE | ACTIVITY                                    | DELIVERY METHOD     | ANNUAL MEASURABLE GOAL   | START DATE        | SCHEDULE   | COMMENTS   | ASSESS THE APPROPRIATENESS OF THE BMP IN ACCORDANCE WITH PART VI.C.1.B | PERMIT REQUIREMENTS MET? |
| 3.1   | identify priority areas, Update this priority area list (Part V.C.3.a.i).               | Staff           | Illicit Discharge Detection and Elimination | GIS Mapping         | Review and update the list of priority areas.                                    | August 2025       | Annually   | Priority areas were Identified in August 2025, and the list was Created.   |  | Yes                      |
| 3.2   | Trace or investigate the source of the illicit discharge (Part V.C.3.a.ii).             | Staff           | Illicit Discharge Detection and Elimination | Field investigation | Conduct DWFS inspections of outfalls & Investigate complaint or incident reports | May 2026          | Continuous | City Staff underwent training for DWFS 08/20/2025. Implementation will commence in FY 2025-2026.                   |  | No                       |
| 3.3   | Remove the source of an illicit discharge (Part V.C.3.a.iii).                           | Staff           | Illicit Discharge Detection and Elimination | Field investigation | Investigate and remove Illicit discharge within 72 hours of receipt              | Already in place. | Continuous | Complaints and reports were attended to within 72 hours of receipt.<br><br>Number of reported illicit discharge: 1 |  | Yes                      |
| 3.4   | Identify problems using visual indicators and simple field test kits (Part V.C.3.a.iv). | Staff           | Illicit Discharge Detection and Elimination | Field investigation | Review SOP and simple field test kits annually                                   | May 2026          | Annually   | Implementation is scheduled for FY 2025-2026.  |  | No                       |

|     |  |        |  |                     |  |                  |          |   |  |     |
|-----|--|--------|--|---------------------|--|------------------|----------|---|--|-----|
| 3.5 | Conduct DWFS (Part V.C.3.a.v).   | Staff  | Illicit Discharge Detection and Elimination                        | Field investigation | inspect 40% of identified outfalls   | Not in place     | Annually | Implementation is scheduled for FY 2025-2026.   |  | No  |
| 3.6 | Implement ordinances, or other regulatory mechanisms , to prohibit illicit discharges (Part V.C.3.a.vi). | Public | Regulatory mechanism (Illicit Discharge Detection and Elimination) | Ordinance           | Review Ordinance annually.   | Already in place | Annually | Stormwater Ordinance 711 has been continually implemented. Ordinance modifications were not necessary during the current reporting period   |  | Yes |
| 3.7 | Develop a storm sewer system map (Part V.C.3.a.vii).   | Staff  | Storm Sewer Mapping  | GIS                 | update storm sewer system map  | Not in place     | Annually | The City of Glenpool is looking to create a master drainage plan as phase II to the recently completed Water and Sewer atlas. All inlets, outfalls, manholes, and storm sewer pipes will be labeled and mapped in ArcGIS. |  | No  |
| 3.8 | Annually update list of occasional incidental non-stormwater discharges or flows.(Part V.C.3.a.viii).    | Staff  | Illicit Discharge Detection and Elimination                        | SWMP                | Maintain and update list of occasional incidental non-stormwater discharges or flows | Already in place | Annually | The list was reviewed in July of 2025. Updates were not necessary during the current reporting period.  |  | Yes |

| MCM 4: CONSTRUCTION SITE STORMWATER RUNOFF CONTROL |  |                 |  |                              |  |                  |            |   |  |                          |
|--|--|-----------------|--|------------------------------|--|------------------|------------|---|--|--------------------------|
| ID NO.   | PERMIT REQUIREMENTS  | TARGET AUDIENCE | ACTIVITY                                 | DELIVERY METHOD              | ANNUAL MEASURABLE GOAL   | START DATE       | SCHEDULE   | COMMENTS  | ASSESS THE APPROPRIATENESS OF THE BMP IN ACCORDANCE WITH PART VI.C.1.B   | PERMIT REQUIREMENTS MET? |
| 4.1  | Implement and enforce ordinances, or other regulatory mechanisms, Review and revise existing ordinance to meet permit requirements (Part V.C.4.a.i). | Developers      | Regulatory mechanism (Construction Site) | Ordinance                    | Enforce stormwater and construction site violations. & Review ordinance    | Already in place | Continuous | Section 8-1-8 of the City of Glenpool's Stormwater Ordinance addresses enforcement of all construction violations. Ordinance modifications were not necessary during the current reporting period.<br><br>Number of NOVs Issued: 5  | Use sanctions and enforcement mechanisms, including non-monetary penalties for non-compliance<br><br><b>Part V.C.4.b.i</b> | Yes                      |
| 4.2  | Implement and enforce procedures for site plan review (Part V.C.4.a.ii).   | Developers      | Regulatory mechanism (Construction Site) | Ordinance                    | Review procedures annually and update as needed.                           | Already in place | Continuous | The City of Glenpool's Earth Change Ordinance is utilized as a guide for all enforcement responses and escalation. No amendments have been made during this permit cycle.<br><br>Number of Earth change issued: 12  | Use sanctions and enforcement mechanisms, including non-monetary penalties for non-compliance<br><br><b>Part V.C.4.b.i</b> | Yes                      |
| 4.3  | Implement and enforce procedures for site inspection and enforcement of control measures, Conduct site inspections (Part V.C.4.a.iii).               | Developers      | Regulatory mechanism (construction site) | Ordinance & Site inspections | Perform construction inspection and review Earth Change ordinance Annually | Already in place | Continuous | The City of Glenpool's Earth Change Ordinance is utilized as a guide for all enforcement responses and escalation. No amendments have been made during this permit cycle.<br><br>Monthly inspections were performed by the Engineering Department during FY 2025 on all open construction sites. The City of Glenpool uses a Construction Site Inspection Report form to perform inspections. A paper and electronic file is kept for each development. | Use sanctions and enforcement mechanisms, including non-monetary penalties for non-compliance<br><br><b>Part V.C.4.b.i</b> | Yes                      |

| MCM 5: POST-CONSTRUCTION MANAGEMENT IN NEW DEVELOPMENT AND REDEVELOPMENT |  |                 |  |                 |  |                  |               |  |  |                          |
|--|--|-----------------|--|-----------------|--|------------------|---------------|--|--|--------------------------|
| ID NO.   | PERMIT REQUIREMENTS  | TARGET AUDIENCE | ACTIVITY                                 | DELIVERY METHOD | ANNUAL MEASURABLE GOAL   | START DATE       | SCHEDULE      | COMMENTS   | ASSESS THE APPROPRIATENESS OF THE BMP IN ACCORDANCE WITH PART VI.C.1.B | PERMIT REQUIREMENTS MET? |
| 5.1  | Implement and enforce ordinances/regulatory mechanisms, to require BMPs (Part V.C.5.a.i).  | Developers      | New development & redevelopment projects | Meeting         | Review local ordinances Annually                               | Already in place | Continuous    | The city holds Pre-Development and Technical Advisory Committee (TAC) meetings for all new commercial and multi-family developments subject to OKR10. The use of BMPs and LID methods are promoted during the Pre-Development meetings.  | Promote non-structural/structural BMPs<br><b>Part V.C.5.b.i</b>        | Yes                      |
| 5.2  | Implement and enforce procedures, such as ordinances/regulatory mechanisms, to ensure long-term operation and maintenance of BMPs (Part V.C.5.a.ii). | Developers      | New development & redevelopment projects | Meeting         | Review local ordinances annually                               | Already in place | Continuous    | The City of Glenpool requires long-term operation and maintenance procedures for post-construction BMPs . On 3/14/2025 The engineering department inspected the completion of the Keyera Bank stabilization project, spearheaded by Keyera Energy Inc. Erosion control mats were installed over a graded slope with riprap for additional protection | Promote non-structural/structural BMPs<br><b>Part V.C.5.b.i</b>        | Yes                      |
| 5.3  | Review local ordinances, regulations, and engineering plans/specifications to identify legal barriers to LID (Part V.C.5.a.iii).                     | Developers      | New development & redevelopment projects | Meeting         | Review local ordinances, regulations, and engineering Criteria | Already in place | Once per year | Developers and the public are made aware of LID strategies by the City of Glenpool Zoning Code and website. The EPA LID BMPs were added to the website for promotion of LID. Additionally, a link to Green Country Stormwater Alliance's website with more information about LID strategies.   | Promote non-structural/structural BMPs<br><b>Part V.C.5.b.i</b>        | Yes                      |

| MCM 6: POLLUTION PREVENTION/GOOD HOUSEKEEPING FOR MS4 OPERATIONS |   |                 |  |                              |  |                  |            |  |   |                          |
|--|---|-----------------|--|------------------------------|--|------------------|------------|--|---|--------------------------|
| ID NO.   | PERMIT REQUIREMENTS   | TARGET AUDIENCE | ACTIVITY                                 | DELIVERY METHOD              | ANNUAL MEASURABLE GOAL   | START DATE       | SCHEDULE   | COMMENTS   | ASSESS THE APPROPRIATENESS OF THE BMP IN ACCORDANCE WITH PART VI.C.1.B  | PERMIT REQUIREMENTS MET? |
| 6.1  | Develop a list of all MS4 facilities impacted by this program (Part V.C.6.a.i).   | City Facility   | Good Housekeeping                        | SWMP                         | Review and update list of all MS4 facilities in SWMP   | Already in place | Annually   | The list of MS4 Systems and Facilities was reviewed in July 2025 for accuracy and no updates were made during the current reporting period   | Reviewing and updating the SWMP<br><b>Part V.C.6.V.D.2.B</b>  | Yes                      |
| 6.2  | Implement and enforce procedures for controlling, reducing or eliminating the discharge of pollutants (Part V.C.6.a.iii).                       | Developers      | Pollution prevention & Good Housekeeping | Site Inspection              | Review and update procedures for controlling and eliminating illicit discharge in Stormwater Ordinance 711 | Already in place | Continuous | The engineering department inspected the completion of the Keyera Bank stabilization project, spearheaded by Keyera Energy Inc within 14 days of completion.   | Establish procedures for proper use, and disposal of both petroleum and non-petroleum products<br><b>Part V.C.6.b.i</b> | Yes                      |
| 6.3  | Implement and comply with procedures to ensure that new flood management projects are assessed for impacts on water quality (Part V.C.5.a.iv.). | Developers      | Pollution prevention & Good Housekeeping | Ordinance & Site inspections | Review and update Floodplain Ordinance   | Already in place | Annually   | Floodplain management Procedures are detailed in Floodplain Management Ordinance 618. During Pre-Development meetings, Civil & Hydrology reviews and Earth Change permit reviews are discussed. The City's Floodplain Manager and City Engineer evaluate each proposed new municipal project for potential water quality impacts during the technical review of the proposed project plans and specifications. |   | Yes                      |

|     |  |                 |   |                  |  |                  |               |  |  |     |
|-----|--|-----------------|---|------------------|--|------------------|---------------|--|--|-----|
| 6.4 | Provide oversight and ensure contractors are contractually required to comply with any stormwater control measures, good housekeeping practices, or facility-specific procedures (Part V.C.5.a.v). | Developers      | Pollution prevention & Good House keeping | Education        | Educate Contractor/developer during preconstruction and post construction meetings | Already in place | Continuous    | The City of Glenpool hosts Pre-construction/post-construction meetings held in person every Thursday at the City Hall. These meetings are for developers/construction site personnel, and topics like Stormwater control plans, good housekeeping practices and other regulations are discussed. These meetings are jointly led by the Engineering Department and Development Services Department. | Use stormwater educational materials developed locally or provided by EPA, states, MS4s and other organizations<br><b>Part V.C.1.b.i</b> | Yes |
| 6.5 | Implement and enforce procedures for inspections of BMP's (Part V.C.5.a.vi).   | City Facilities | Pollution prevention & Good House keeping | Site inspections | Conduct Site inspection of MS4 facilities impacted by this program                 | Already in place | Once per year | All City-owned facilities are inspected annually and deficiencies and applicable corrective action items are discussed with Public Works Director and Public Works superintendent. Facility inspections were last performed in July of 2025.   | Establish procedures for proper use, and disposal of both petroleum and non-petroleum products<br><b>Part V.C.6.b.i</b>                  | Yes |

## APPENDIX A: Supporting Documents for MCM 1

### Facebook Post Examples

March

 City of Glenpool, Oklahoma  
Mon 3/3/2025 10:15 am CST

⚡️🚫 ONLY RAIN DOWN THE DRAIN!🚫⚡️

Did you know? Storm drains flow directly into...



Engagement Rate (per Impression) 3.2%

Impressions 3,425

Engagements 109

April

 City of Glenpool, Oklahoma  
Thu 4/24/2025 2:03 pm CDT

🌿🏡 Yard Smart = Flood Smart!

Did you know your landscaping choices can...



Engagement Rate (per Impression) 3.6%

Impressions 2,936

Engagements 106

## May



**City of Glenpool, Oklahoma**  
Mon 5/19/2025 9:21 am CDT

🐾 🐶 Don't let your dog's business become everyone's problem!

...



|   |       |
|---|-------|
| <u>Engagement Rate (per Impression)</u> | 2.6%  |
| <u>Impressions</u>                      | 1,909 |
| <u>Engagements</u>                      | 49    |

## June



**City of Glenpool, Oklahoma**  
Thu 6/5/2025 10:45 pm CDT

Construction projects are vital to our City's growth—but without proper planning, they can harm our environment. This month's stormwat...



|   |       |
|---|-------|
| <u>Engagement Rate (per Impression)</u> | 2.4%  |
| <u>Impressions</u>                      | 3,680 |
| <u>Engagements</u>                      | 90    |

## September



**City of Glenpool, Oklahoma**

Mon 9/22/2025 9:30 am CDT

Grass clippings don't belong in the street! Bag your clippings and keep storm drains clear. Sweeping or raking grass and leaves off...



Engagement Rate (per Impression) 11.2%

Impressions 5,141

Engagements 576

## October



**City of Glenpool, Oklahoma**

Wed 10/8/2025 9:25 am CDT

Let's all do our part to keep Glenpool's environment healthy and thriving.   
**#StormwaterAwareness...**



Engagement Rate (per Impression) 1%

Impressions 1,612

Engagements 16

## 2025 Community Cleanup Collection Totals

[+ Add new item](#)[Edit in grid view](#)[Share](#)[Copy link](#)[Export to Excel](#)

| Title                  | Details                      | Weight (lbs) |
|------------------------|------------------------------|--------------|
| Car Batteries          | 17                           | 489          |
| Alkaline Batteries     | 6x 5gallon buckets           | 420          |
| Rechargeable Batteries | 2x 5gallon buckets           | 150          |
| Cardboard              |                              | 3000         |
| E-Waste                |                              | pending      |
| Fire Extinguishers     | 20                           | 200          |
| Plastic Bags           | 1x 65gallon bag              | 16           |
| Paint                  | 1 trailer (300 partial cans) | 900          |
| Sharps                 | 6 boxes                      | 40           |
| Tires                  | 79                           | 1738         |
| Solid Waste            | 30x 30 yard crushed rolloffs | 210,000      |



Volunteer event Flyer



six-graders on Arbor Day – 03/26/25



Civic event in collaboration with Bluethumb – 01/21/2025



Civic event in collaboration with Bluethumb – 01/21/2025



Civic event in collaboration with Bluethumb – 01/21/2025



# CERTIFICATE OF COMPLETION

presented to

Aidelokhai Akhigbe

who has successfully completed EPA's Construction General Permit (CGP) Site Inspector Training  
and passed the final exam

Chris Kloss, Water Permits Division Director



Date Certified: 9/7/2025

Expiration Date: May 17, 2027

By completing this course and passing the final exam, Aidelokhai Akhigbe has complied with the CGP Part 6.3.a training requirement for conducting construction inspections under the 2022 CGP.



United States  
Environmental Protection  
Agency

EPA Training Certificate-9/7/25

# *Certificate of Completion*



*2025 Annual Conference*

*is hereby awarded to*

*Okhai Akhigbe*

*This signifies your attendance and participation in the Oklahoma Floodplain Managers Association,  
2025 Annual Conference September 22-24, 2025, and you are hereby awarded  
12 Continuing Education Credits.*

A handwritten signature in black ink, appearing to read 'J. H. Akhigbe'.

OFMA Chair

24 September 2025

Date

OFMA Annual conference certificate

# OKLAHOMA WATER RESOURCES BOARD

State of Oklahoma  
acknowledges that

## Okhai Akhigbe

has successfully completed training in

### **FLOODPLAIN MANAGEMENT 101** *Training for Administering and Enforcing the Flood Damage Prevention Ordinance*

Workshop held in

Broken Arrow, OK

on

August 19th, 2025

This Workshop participant will receive six hours of Continuing Education Credits  
toward his/her professional floodplain management certification  
continuing education requirements.

Jonathan Phillips, CFM

Workshop Facilitator



OWRB Training Certificate- 08/19/25

## Erosion and Sediment Control Inspection Report Form

Inspector:

Project Name:

Time:



|                  |  |
|------------------|--|
| Location/address |  |
| Weather          |  |
| Owner            |  |



### Pollution Control Measures (BMP) Checklist:

- SWPPP on site
- Inlet Barriers
- Sediment Barriers
- Erosion Blankets
- Stabilized Construction Entrance
- Construction site notice
- Waste and Materials Managed Properly
- Sediment Basins & Discharge Locations
- Dust Control in Place
- General Site Condition (Sediment Tracked Offsite, Concrete Washout Properly Contained)

### Problem Areas / Special Observations

| BMP | Location | Observations, Effectiveness, & Corrective Actions Ordered |
|-----|----------|---|
|     |          |   |
|     |          |   |
|     |          |   |
|     |          |   |
|     |          |   |

Date of inspection \_\_\_\_\_

Inspector Signature\_\_\_\_\_

Site Inspection form

Report a Stormwater Violation #975

SUBMITTER

Category: Report A Concern

Priority: 3

Assigned To: Unassigned

Submitted: 10/8/2025 1:37 PM CONTACT

Source: Website 184.187.255.125

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REQUEST DETAILS

Description

Witnessed Guzman taco truck in front of Jiffy Lube at 121st dumping. I'm assuming the their oil they use in the drain in front of the car wash. It is not far from where they are set up. I reported this last year and was told someone would talk with them. I have seen them since then, just a month or so ago, when it gets dark, taking something over to the drain. Let's work take care of our water and the Earth.

---

Brief Description

Witnessed Guzman taco truck in front of Jiffy Lube at 121st dumping. I'm assuming the their oil they use in the drain in front of the car wash. It is not far from where they are set up. I reported this last year and was told someone would talk with them. I have seen them since then, just a month or so ago, when it gets dark, taking something over to the drain. Let's work take care of our water and the Earth.

Problem Location

Street Number and Name

Na

Front of Jiffy Lube at 121st

Address Line 2

Na

City

Glenpool

Stormwater violation report from City website

OA To: ikimbrough@cityofowasso.com <ikimbrough@CityOfOwasso.com>  
 Cc: David Ajetunzin  
 Hello Lauren,

I hope you're doing well.

My name is Okhai, and I'm the Engineering Technician for the City of Glenpool. I received your contact information from Mark Thibodeau.

I'm reaching out regarding the dry weather testing program in Owasso. The City of Glenpool is in the early stages of starting its own program, and we're hoping to learn more about your process. Would it be possible to arrange a visit to discuss and observe how you conduct dry weather testing? Also, do you have inspection templates that we could reference or adapt to help us create our own?

Thank you for your time and I look forward to your response

Best,  
 Okhai A.  
 Engineering Technician  
 918-209-4614  
 okhai@cityofglenpool.com

KL To: Okhai Akhigbe  
 Cc: David Ajetunzin

You replied on Tue 8/12/2025 5:29 PM

This sender ikimbrough@CityOfOwasso.com is from outside your organization.

The 20<sup>th</sup> will work for us! Can you be here by 9? The address is 301 W. 2<sup>nd</sup> Ave.

Lauren Kimbrough  
 Pretreatment & Stormwater Administrator  
 City of Owasso  
 Public Works Department  
 301 West Second Avenue  
 Owasso, Oklahoma 74055  
 918-376-1519 FAX 918-272-4996  
 ikimbrough@cityofowasso.com

  
<https://www.cityofowasso.com/498/Stormwater>

OA To: Kimbrough, Lauren <ikimbrough@CityOfOwasso.com>; gragsdale@CityOfOwasso.com  
 Cc: David Ajetunzin  
 Hello Lauren and Gavin,

Thank you both for being very welcoming during my visit to Owasso and for taking the time to walk me through your dry weather testing program and procedures. I appreciate the knowledge you shared, the materials you provided and the opportunity for hands-on training. The experience was very valuable.

I am very grateful for your time, and I look forward to staying in touch and collaborating with you again soon.

Many Thanks,  
 Okhai A.  
 Engineering Technician  
 918-209-4614  
 okhai@cityofglenpool.com

KL To: Okhai Akhigbe; Ragsdale, Gavin <gragsdale@CityOfOwasso.com>  
 Cc: David Ajetunzin

This sender ikimbrough@CityOfOwasso.com is from outside your organization.

You're welcome, Okhai. It was really nice to meet you and we look forward to networking with you again soon! Take care.

Sincerely,

Lauren Kimbrough  
 Pretreatment & Stormwater Administrator  
 City of Owasso  
 Public Works Department  
 301 West Second Avenue  
 Owasso, Oklahoma 74055  
 918-376-1519 FAX 918-272-4996  
 ikimbrough@cityofowasso.com



## Owasso Training Email Thread

DN Duy Nguyen

To: Gerald Gilbert; Okhai Akhigbe; Joel Huff; David Agbetunsin; Chad Coomer; Kyle McMurrian; Jeremy McCool; Jesse Hale; +1 other  
Cc: David Tillotson; Joseph Wuest

Wed 9/24/2025 2:15 PM

Pre Dev-Pre Con Agenda - S... 2 MB

Hello Team,

I've attached the Pre-Dev / Pre-Con Meeting Agenda for September 25, 2025. **There are two (2) items scheduled at 9 am and 10 am.** Thank you, I look forward to seeing you all there! Please let me know if you have any questions.

Best,  
Duy Nguyen  
City Planner  
City of Glenpool  
Phone: 918-209-4618  
Email: dnguyen@cityofglenpool.com

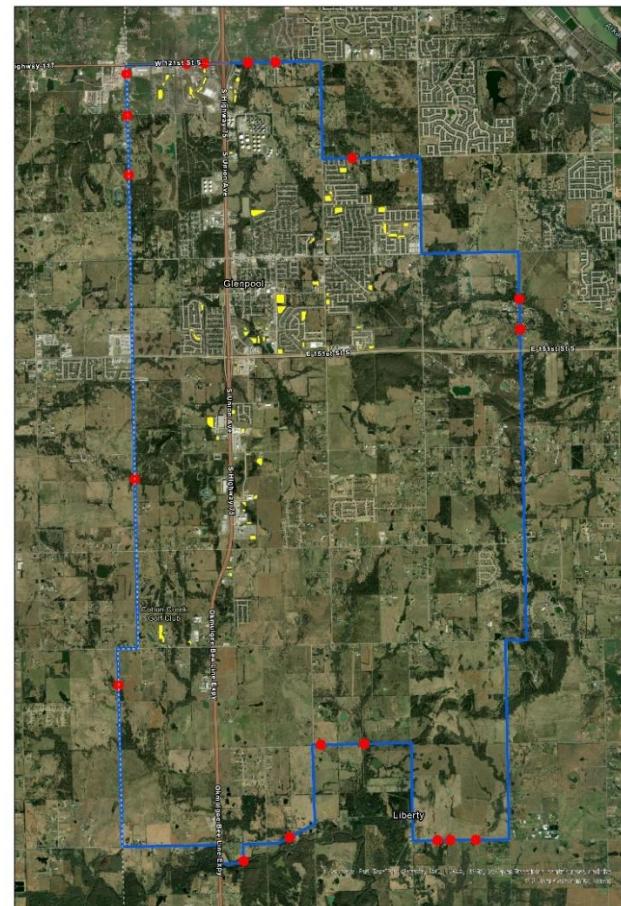
**City of**  
**Glenpool**  
*Creating Opportunity*

Thank you. See you then. I will be there. Thank you!

Reply Reply all Forward

Email sample of weekly Pre-Development meetings

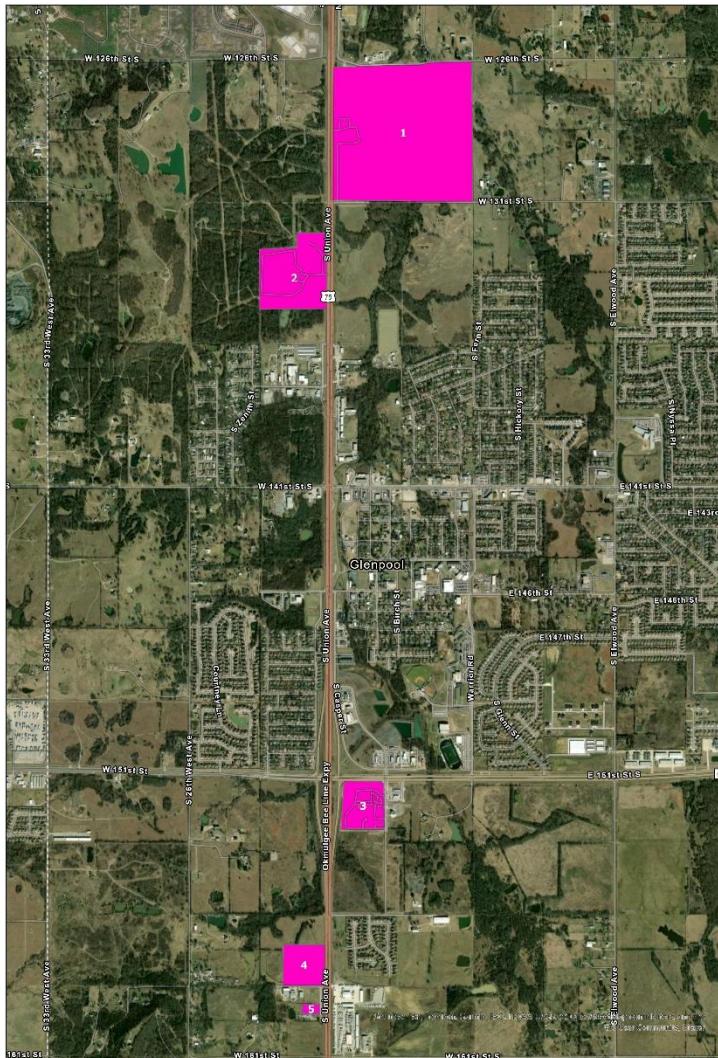
## APPENDIX B: Supporting Documents for MCM 3



**Glenpool**  
Creating Opportunity

## Glenpool Outfall Map

- Outfalls
- GP\_Fenceline
- Detention Ponds



**City of  
Glenpool**  
*Creating Opportunities*

**City of Glenpool Industrial  
dischargers**

- Industrial Facilities

1. Explorer Pipeline Services
2. Magellan Pipeline Service
3. St. Francis Hospital
4. Champagne Metals
5. Sundown Marine

## APPENDIX C: Supporting Documents for MCM 4

10/29/2025 4:48 PM PROJECT MASTER REPORT PAGE: 7  
PROJECTS: THRU ZZZZZZZZZZ REPORT SEQUENCE: Project  
PROJECT TYPE: Include: EC CONTRACTOR CLASS: A11 - All Contractor Classes  
CONTRACTORS: A11  
APPLIED DATES: 0/00/0000 THRU 99/99/9999 EXPIRE DATES: 0/00/0000 THRU 99/99/9999  
STATUS INCLUDED: A11 ISSUED DATES: 11/01/2024 THRU 10/31/2025

---

### \*\*\* PROJECT TYPE RECAP \*\*\*

| PROJECT TYPE      | # OF PROJECTS | BALANCE |
|-------------------|---------------|---------|
| EC - EARTH CHANGE | 12            | 100.00  |
| *** TOTALS ***    | 12            | 100.00  |

Total Number of Earth Change Permits Issued.

**L. Violations and Penalties:**

1. **Scope of Remedies.** It shall be unlawful and an offense for any person or entity to violate any provision of this section or any regulation, rule or policy established by the City pursuant to this section. The administration or prosecution of administrative, civil or criminal penalties under this subsection shall not prevent the City or its agents from taking any lawful action necessary to remediate or correct a violation, including actions to prevent future violations that would adversely affect the City's MS4 or any waterway, or the public's health safety and welfare.
2. **Administrative Actions.** In addition to, or in place of, any civil or criminal penalties imposed for violations of this section, the following actions may be undertaken by the Administrator:

An earth change permit or building permit may be suspended or revoked by the Administrator if one or more of the following violations have been committed:

- a. Violations of the conditions of the earth change permit or SP3.
- b. Noncompliance with correction notice(s) or stop work order(s).
- c. The existence of an immediate danger to a downstream area.

In addition, pursuant to paragraph 5 of this subsection, the Administrator may, as deemed necessary in his discretion to prevent imminent danger to any person, property, waters of the state or water treatment facility, issue a Stop Work Order.

3. **Notice of Violation.** Whenever on the basis of any information available, the Administrator has reasonable grounds to believe any person or entity is in violation of any of the provisions of this section or of any lawful regulation or policy adopted pursuant to this section, the Administrator shall issue a Notice of Violation (NOV) demanding such person or entity to comply with such provision, regulation or policy and to cease and desist from any activity creating such violation.
4. **Content and Service of NOV.** Any NOV issued pursuant to paragraph 3 of this subsection shall provide the following information:
  - a. Date of issuance;

Section of Storm Ordinance 711 about violation and penalties

- b. Project name and address;
- c. Person or owner, manager or other agent of entity to whom the order is issued;
- d. Earth change permit number and/or building permit number (if applicable);
- e. The nature of the violation (including a reference to the applicable provisions of this section);
- f. Specify a reasonable and prompt time for compliance not to exceed thirty (30) days (except that in any instance in which the Administrator issues a Stop Work Order, compliance shall be as immediate as actually possible);
- g. Notify such person or entity of the potential penalties for refusal or failure to comply with the NOV, including criminal actions in either of the Glenpool Municipal Court or the Tulsa County District Court, as applicable; and
- h. Signature and contact information of the Administrator.

Any NOV may be served upon a person or upon an owner, manager or other agent of any entity by either:

- a. In hand delivery to such person or owner, manager or other agent of any entity; or
- b. Certified mail, return receipt requested and delivery restricted to the addressee.

- 5. Stop Work Order. If the Administrator deems such action necessary, in his discretion, to prevent imminent danger to any person, property, waters of the state or water treatment facility; or if a violating person or the owner, manager or other agent of an entity is not readily available; or if a person or entity which has been served an NOV fails or refuses to comply with the provisions of the NOV, the Administrator shall post a Stop Work Order on the premises. The Stop Work Order shall be posted in a conspicuous place on the premises. The Stop Work Order shall cause all activity not necessary to correct the violation to cease until the violation is corrected. The Stop Work Order shall provide the following information:

- a. Date of issuance;
- b. Project name and address;
- c. Person or owner, manager or other agent of entity to whom the order is issued;
- d. Earth change permit number and/or building permit number (if applicable);
- e. The nature of the violation (including a reference to the applicable provisions of this section);
- f. Specific demand that compliance shall be as immediate as actually possible;
- g. Notify such person or entity of the potential penalties for violation of the Stop Work Order, including criminal actions in either of the Glenpool Municipal Court or the Tulsa County District Court, as applicable; and

## Section of Storm Ordinance 711 about violation and penalties

h. Signature and contact information of the Administrator

Unauthorized removal of a Stop Work Order shall be a violation of this section.

6. **Citation or Arrest Possible.** If any such person or owner, manager or other agent of any entity refuses or fails to comply with an NOV issued pursuant to paragraphs 3 and 4 of this subsection, or a Stop Work Order posted pursuant to paragraph 5 of this subsection, the Administrator shall issue a citation to such person or owner, manager or other agent of any entity answerable in the Glenpool Municipal Court; or, if the penalty sought for the alleged violation, taking into account the seriousness of the violation in the judgment of the Administrator and upon consultation with the City Attorney, shall exceed the jurisdiction of the Municipal Court, a police officer may make an arrest and demand appearance in the Tulsa County District Court.
7. **Criminal Penalties.** Violations of this section may be punishable in criminal proceedings by a fine of not less than two hundred dollars (\$200.00) and not more than one thousand dollars (\$1,000.00) in the Glenpool Municipal Court and not more than ten thousand dollars (\$10,000.00) in Tulsa County District Court for each violation; or by imprisonment in the City jail for not more than (10) days by the Glenpool Municipal Court or in County jail for not more than six (6) months by the Tulsa County District Court; or by both such fines and imprisonment. Each lot or parcel of land on which a violation occurs and each day on which a violation exists following the failure or refusal of any person or entity to comply with an NOV issued pursuant to paragraphs 3 and 4 of this subsection, or a Stop Work Order posted pursuant to paragraph 5 of this subsection, shall constitute a separate violation, provided that the aggregate amount of such fines shall not exceed one hundred twenty-five thousand dollars (\$125,000.00) per violation and such imprisonment shall not exceed six (6) months in the County jail. A single action that leads to simultaneous violations of more than one provision of this section on the same lot or parcel of land shall be treated as a single violation for each day of its occurrence.
8. **Decisions of the Court.** In determining the amount of any penalty to be assessed under this subsection by either of the Glenpool Municipal Court or the Tulsa County District Court, pursuant to provisions of the Oklahoma Environmental Quality Code, at Title 27A §§ 2-101 *et seq.*, of the Oklahoma Statutes, the court shall take into account:
  - a. The nature, circumstances, extent and gravity of the violation(s);
  - b. The violator's ability to pay;
  - c. Any prior history of such violation(s);
  - d. The degree of culpability;
  - e. The benefit of economic savings, if any, resulting from the violation; and
  - f. Such other matters as justice may require.

Section of Storm Ordinance 711 about violation and penalties

9. Civil Action. The City Attorney is authorized to commence a civil action in the Tulsa County District Court for appropriate relief, including but not limited to a temporary or permanent injunction, for any violation for which the Administrator has issued an NOV or posted a Stop Work Order, in addition to any provisions for criminal prosecution in this section.

10. State Action. Any person or entity which violates any provision of this section, or any NOV issued or Stop Work Order posted by the Administrator shall, in addition to any other penalties prescribed by this subsection, be subject to being reported to the Oklahoma Department of Environmental Quality and subject to all civil and criminal penalties provided by, and in accordance with procedures established by, the Oklahoma Environmental Quality Code, at Title 27A §§ 2-101 *et seq.*, of the Oklahoma Statutes.

§ 2. The Municipal Bond Schedule shall be amended to make the following provisions:

| CLASS "B" OFFENSE                             | CODE CITE | STATUTE     | FINE          | COURT COSTS | STATE FEE | TOTAL PENALTY (Maximum)    |
|---|-----------|-------------|---------------|-------------|-----------|----------------------------|
| VIOLATION OF STORM WATER PROTECTION ORDINANCE | 8-1-8     | 27A-2-3-502 | Up to \$1,000 | \$40        | \$19      | \$1,059.00<br>10 days jail |

§ 3. All ordinances or resolutions, or parts of ordinances or resolutions, or any other action by the Glenpool City Council in apparent or actual conflict with this Ordinance shall be and hereby are repealed or invalidated, respectively, and rendered of no effect from the date of adoption of this Ordinance.

§ 4. It being immediately necessary for the preservation of the peace, health, and safety of the City of Glenpool and the inhabitants thereof to regulate the contributions of pollutants into the City's municipal storm sewer system through prohibited discharges, spills, construction activities, dumping, or other activities and implement inspection, surveillance and monitoring procedures necessary to determine compliance and noncompliance with this Ordinance and applicable federal and state laws, rules, and regulations, an emergency is hereby declared to exist whereby the provisions of this Ordinance shall become effective immediately upon passage and publication as provided by state law.

Section of Storm Ordinance 711 about violation and penalties