



SCOTT A. THOMPSON
Executive Director

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY

KEVIN STITT
Governor

April 19, 2019

R. Louis Reynolds, RMUA Chairman
c/o Sherry Gaston, RMUA Administrator
Regional Metropolitan Utility Authority
200 Civic Center, Room 403
Tulsa, Oklahoma 74103

Re: FY 2019 Pretreatment Compliance Inspection
Facility No. S-20434
OPDES Permit No. OK0034363

Dear Mr. Reynolds:

A Pretreatment Compliance Inspection (PCI) of the Regional Metropolitan Utility Authority (RMUA) [Control Authority (CA)]'s Industrial Pretreatment Program was conducted by personnel from the Municipal Wastewater Enforcement Section (MWES), Water Quality Division (WQD), Department of Environmental Quality (DEQ), on February 5, 2019. A copy of the resulting report is enclosed. Please review the report for detailed comments in addition to the findings summarized below.

No findings of required actions/violations were identified during the inspection.

The CA is to be commended for their well-operated and executed industrial pretreatment program (IPP). The CA maintains records on recycling and quantities of items received at the Metropolitan Environmental Trust (MET), best management practices (BMPs), educational outreach regarding various food handling establishments (FHEs) and other educational events. The CA is to be commended on the proactive measures and scope of the Industrial Pretreatment Program including P2 and education.

Questions or comments regarding this inspection may be directed to me as follows: E-mail: roshini.schroeder@deq.ok.gov, Telephone 405-702-8132, or write to me at the letterhead address.

Sincerely,

Roshini Schroeder, Municipal Pretreatment Coordinator
Municipal Wastewater Enforcement Section
Water Quality Division

RS/BFC/MBM/md ST/CG

Enclosure: PCI Inspection Report

cc: Rudy Molina, Pretreatment Coordinator, U.S. EPA Region 6 (w/ Enclosure)
✓ Lauren Wilson, RMUA Pretreatment Coordinator, City of Broken Arrow (w/Enclosure)
Charles Vokes, Utilities Director, City of Broken Arrow (w/Enclosure)
Debbie Nichols, Regional Manager, ECLS, DEQ



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

NPDES Compliance Inspection Report

Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspec. Type	Inspector	Fac Type
1 N 2 5 3 O K 0 0 3 4 3 6 3 11 12 1 9 0 2 0 5 17 18 P 19 S 20 1					
Remarks					
F a c i l i t y N u m b e r S - 2 0 4 3 4					
Reserved Facility Evaluation Rating BI QA -----Reserved-----					
67 69 70 71 72 73 74 75 80					

Section B: Facility Data

Name and Location of Facility Inspected Regional Metropolitan Utility Authority (RMUA) Haikey Creek Industrial Pretreatment Program Broken Arrow, Oklahoma	Entry Time [X] AM [] PM 11:00	Permit Effective Date September 1, 2018
	Exit Time/Date 12:30 PM February 5, 2019	Permit Expiration Date August 31, 2023
Name(s) of On-Site Representative(s) Lauren Wilson	Title(s) Pretreatment Coordinator (City of Broken Arrow contract)	Phone No(s) 918-455 4762
Name, Address of Responsible Pretreatment Official Clayton Edwards Regional Metropolitan Utility Authority (RMUA) 200 Civic Center, Room 403 Tulsa, Oklahoma 74103	Title Manager, Water Quality Assurance	Phone No. 918-596-1334
		Contacted ☒ Yes ☐ No

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

N	Permit	N	Flow Measurement	S	Pretreatment	N	Operation and Maintenance
N	Records/Reports	N	Laboratory	N	Compliance Schedule	N	Sludge Disposal
N	Facility Site Review	N	Effluent/Receiving Waters	N	Self-Monitoring Program	N	Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

* Charles Vokes, Director of Utilities for the City of Broken Arrow attended the exit interview.

See attached report for details.

Name(s) and Signature(s) of Inspector(s) Roshini Schroeder <i>Roshini Schroeder</i>	Agency/Office/Telephone DEQ / Water Quality Division / 405-702-8132 Municipal Wastewater Enforcement Section	Date 4/19/19
Name and Signature of Reviewer Brian F. Clagg, P.E. <i>Brian F. Clagg</i>	Agency/Office/Telephone DEQ / Water Quality Division / 405-702-8118 Municipal Wastewater Enforcement Section	Date 4/19/19

Regulatory Office Use Only

Action Taken	Date	Compliance Status
		☐ Noncompliance
		☐ Compliance

Oklahoma Department of Environmental Quality
NPDES Compliance Inspection Report
Supplement
Pretreatment Compliance Inspection (PCI)

Name of Control Authority: **Regional Metropolitan Utility Authority**

Name of Pretreatment Contact: **Lauren Wilson**

Telephone: **918-455-4762**

FAX: **918-455-4172**

E-mail addresses: **lwilson@brokenarrowok.gov**

I. PRE-SITE VISIT REVIEW To be completed by Municipal Pretreatment Coordinator

Name: **Roshini Schroeder**

Signature: *Roshini Schroeder*

Date: **4/19/19**

A. Approved Pretreatment Program (APP)

1. Pretreatment Program Approval Date: **September 24, 1993**

2. Program Modification Approval Date(s): **1/16/02**

3. Date of Last Inspection: **April 11, 2018**

Type of Last Inspection: **PCI**

4. Annual Report:

[40 CFR 403.12(i)]

Due: **October 31, 2018**

Received: **October 30, 2018**

Periods Covered: From **10/1/17** to **9/30/18**

5. Does the annual report document any changes to:

If yes, explain in Additional Notes/Comments.

a) Organizational Structure

☐ YES

☒ NO

b) Staffing Levels?

☐ YES

☒ NO

c) Multi-jurisdictional Issues

☐ YES

☒ NO

B. Industrial User Status

1. Number of Significant Industrial Users (SIUs): 5

2. Number of Categorical Industrial Users (CIUs): 2

List any new CIUs in Additional Notes/Comments

3. SIUs not inspected or sampled: 0

4. SIUs without Control Mechanisms: 0

5. SIUs in Significant Noncompliance (SNC) with standards or reporting: 0

(reporting includes BMRs, 90-day, self-monitoring, compliance schedules, and non-compliance)

6. SIUs in SNC with self-monitoring requirements: 0

7. SIUs in SNC with self-monitoring and not inspected or sampled: 0

C. Local Limits

List below the current program limits:

		Concentration Limits
		Daily (mg/L)
Arsenic	(As)	<u>2.0</u>
Cadmium	(Cd)	<u>0.5</u>
Chromium-Total	(Cr)	<u>2.8</u>
Copper	(Cu)	<u>4.5</u>
Cyanide	(CN-)	<u>0.8</u>
Lead	(Pb)	<u>1.5</u>
Mercury	(Hg)	<u>0.43</u>
Molybdenum	(Mo)	<u>33.8</u>
Nickel	(Ni)	<u>5.0</u>
Selenium	(Se)	<u>no limit</u>
Silver	(Ag)	<u>0.5</u>
Zinc	(Zn)	<u>5.0</u>
Oil & Grease		<u>500</u>

- Has the CA evaluated their TBLLs per current permit language? ☒ YES ☐ NO ☐ N/A
- If head-works loading, were they evaluated as part of the annual report? ☐ YES ☐ NO ☒ N/A
If no, explain in Additional Notes/Comments.
- Have pollutant scans of POTW influent and effluent been conducted at the frequency required by the approved pretreatment program/OPDES Permit and submitted as part of the annual report? ☒ YES ☐ NO
If no, explain in Additional Notes/Comments.
- Are the local limits satisfactory and without any apparent problems? ☒ YES ☐ NO
If no, explain in Additional Notes/Comments.
- Has the POTW been free from any inhibitions and/or upsets from IUs since the last annual report? ☒ YES ☐ NO
If no, explain in Additional Notes/Comments.

D. Enforcement

- SIUs in SNC *If yes, List below* ☒ YES ☐ NO
Comgraphx/Communication Graphics
- SIUs in SNC Published *40 CFR 403.8(f)(2)(vii)* ☒ YES ☐ NO ☐ N/A
- Does the APP include an Enforcement Response Plan (ERP)? ☒ YES ☐ NO

Additional Notes/Comments:

Section # Note or Comment

- I.C.1. A technically based local limit (TBLL) study is in progress and will be submitted to the DEQ by May 31, 2019. The Annual Report, along with a sampling plan for review, was submitted on October 31, 2018.

II. ONSITE INSPECTION To be completed by Municipal Enforcement EngineerName: Roshini SchroederSignature: Roshini SchroederDate: 4/19/19**A. Industrial User Inventory**

1. Have any SIUs been added or deleted that were not included in the most recent Annual Report?

☐ YES ☒ NO

If yes, list any additions or deletions:

ADDITIONS	DELETIONS

2. Has the industrial survey been kept updated? [40 CFR 403.8(f)(2)(i)]

☒ YES ☐ NO**B. Local Limits**

3. Do current local limits match approved local limits (see I.C)

☒ YES ☐ NO

Note: The remaining sections pertain to the specific IU file reviewed.

Name of IU **Comgraphx/Communication Graphics**IU Classification ☐ CIU ☒ SIU ☐ NON-SIU**C. Control Mechanism/Permit (Permit)**

1. Is the Permit In Effect?

☒ YES ☐ NO

2. Does the Permit include local limits/categorical standards as applicable?

☒ YES ☐ NO

3. Does the Permit include appropriate monitoring and reporting requirements?

☒ YES ☐ NO

4. Does the Permit include the following standard conditions?

- | | | | | |
|---|----------------------------|---|-----------------------------|---|
| a) Permit Transfer Limitations | 403.8(f)(1)(iii)(B) | ☒ YES | ☐ NO | ☐ N/A |
| b) Termination/Revocation Clause | | ☒ YES | ☐ NO | ☐ N/A |
| c) Prohibition of Bypass | 403.17(d) | ☒ YES | ☐ NO | ☐ N/A |
| d) Slug Load Notification Requirement | 403.12(f) | ☒ YES | ☐ NO | ☐ N/A |
| e) Notification of Upsets and Process Changes | 403.8(f)(1)(i); 403.16 | ☒ YES | ☐ NO | ☐ N/A |
| f) POTW Right of Entry | 403.8(f)(1)(v) and (vi)(B) | ☒ YES | ☐ NO | ☐ N/A |
| g) Statement of Applicable Civil and Criminal Penalties | 403.8(f)(1)(iii)(E) | ☒ YES | ☐ NO | ☐ N/A |
| If not, are these covered by another legal agreement? | | ☐ YES | ☐ NO | ☒ N/A |

D. Control Authority IU Compliance Inspection

1. Was the IU inspected at the frequency required by the APP?

☒ YES ☐ NO ☐ N/A

2. Does the CA Compliance Inspection cover the following areas?

- | | | | |
|--|---|-----------------------------|---|
| a) Inspection of the manufacturing facilities? | ☒ YES | ☐ NO | |
| b) Inspection of pretreatment facilities? | ☒ YES | ☐ NO | ☐ N/A |
| c) Inspection of the sampling procedures and monitoring records? | ☒ YES | ☐ NO | ☐ N/A |
| d) Accuracy of flow measurements/reporting | ☒ YES | ☐ NO | ☐ N/A |
| e) Evaluation of the need for a Slug Control Plan? | ☒ YES | ☐ NO | |
| f) Confirmation of compliance with approved TOMP? | ☐ YES | ☐ NO | ☒ N/A |

3. Are inspections sufficiently detailed to identify processes and associated discharges that are regulated by Federal Categorical Standards or to verify that source and discharge locations of all Categorical wastewater streams are unchanged?

☐ YES ☐ NO ☒ N/A

E. Control Authority IU Compliance Sampling and Analyses

1. Was the IU sampled at the frequency required by the APP? ☒ YES ☐ NO ☐ N/A
2. Did the CA sampling of the IU include analysis for all regulated pollutants? ☒ YES ☐ NO ☐ N/A
3. Is the CA keeping proper field notes and chain-of-custody receipts? ☒ YES ☐ NO ☐ N/A

F. Industrial User Self-Monitoring

1. Does the IU file contain all required self-monitoring reports? ☒ YES ☐ NO ☐ N/A
2. Are all regulated parameters reported by the IU in the self-monitoring reports? ☒ YES ☐ NO ☐ N/A
3. Have all signatory requirements for CIUs (SMR/TOMP Certification) been met? [40 CFR 403.12(f)] ☒ YES ☐ NO ☐ N/A
4. Does the CA verify completeness, approved analytical techniques, proper field notes and chain-of-custody receipts of IU self-monitoring reports? ☒ YES ☐ NO ☐ N/A

G. Enforcement

1. Is the IU Significantly Noncompliant (SNC)? ☒ YES ☐ NO
- If yes, has the CA taken appropriate enforcement action [refer to ERP]? ☒ YES ☐ NO ☐ N/A

H. Overall Pretreatment Program Evaluation

1. Do pretreatment staffing levels and training appear adequate? ☒ YES ☐ NO ☐ N/A
2. Have any efforts been made to incorporate Pollution Prevention? [Not a requirement] ☒ YES ☐ NO
- If yes, describe:*

Additional Notes/Comments:

Question # Note or Comment

1.A.4. The CA will ensure that the %MAHL numbers on the Headwork Loading for the Reporting Period in the Annual Report are numeric and adjusted to the column width of the table.

1.C.1. The CA has been conducting a sampling plan to accomplish updating their Technically Based Local Limits (TBLLs). The CA has completed sampling commercially, residentially and the Industrial Parks within the CA's jurisdiction.

II.G.1. Comgraphx (SIU) reported silver violations on January 26, 2018; February 14, 2018; April 19, 2018; May 2, 2018 June 15, 2018, August 10, 2018 and September 11, 2018. The SIU followed all notification protocols including 24 hour notification, retests and written responses. Two NOV's were issued for the above silver violations on March 8, 2018 and May 14, 2018. The SIU was formally directed to cease discharge from the silver recovery unit on September 11, 2018. All documentation and responses were included in the Annual Report submitted on October 31, 2018.

II.H.2. RMUA, Broken Arrow (BA) and Tulsa Municipal Utilities Authority (TMUA) partner in pollution prevention (P2) activities. The CA has extensive programs including Pharmaceutical/Medication Disposal, Dental Mercury Amalgam, Best Management Practices (BMP) for Silver, Printers, Fats, Oils and Grease (FOG), mobile food establishments and the City of Tulsa's Partners for a Clean Environment (PACE) initiative. The CA is to be commended on the proactive measures taken to incorporate P2.