



CITY OF
BROKEN ARROW

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Utilities Department
Post Office Box 610
Broken Arrow, Oklahoma 74013

To: Mayor Craig Thurmond, Chairman, Regional Metropolitan Utility Authority

From: Lauren Wilson, Pretreatment Coordinator, City of Broken Arrow

Date: Monday, August 27, 2018

Subject: May to July 2018 RMUA Pretreatment Report

Dear Mayor Thurmond,

The following is a brief synopsis of the major activities of the Broken Arrow Industrial Pretreatment Program for the period of May to July 2018. This update regards pretreatment issues and industrial wastewater discharges pertaining to the R.M.U.A.'s Haikey Creek Wastewater Treatment Plant.

May 2018:

Fats, Oil & Grease (FOG) Program Activities

1. Food Handling Establishment Inspections:

- City of Broken Arrow Pretreatment staff performed 44 food handling establishment inspections in the month of May. Staff reviewed manifests for grease interceptor maintenance, inspected the interceptors, and discussed best management practices with management. Establishments with interceptors that were improperly maintained or in need of repair were given 15 days to correct the deficiency. Re-checks were done for non-compliance issues.

2. Car Wash Inspections:

- City of Broken Arrow Pretreatment staff performed 6 car wash inspections in the month of May. Staff inspected manifests for sand interceptor and oil/water separator maintenance, inspected the interceptors, and discussed best management practices with management. Establishments with interceptors that were improperly maintained or in need of repair were given 15 days to correct the deficiency. Re-checks were done for non-compliance issues. "No Dumping" signs are being distributed to self-service facilities asking the public not to dump motor oil or chemicals into car wash bays. Car wash management is encouraged to contact the City for assistance if they notice anyone dumping something that they shouldn't.

Industrial Pretreatment Activities:

1. Compliance reports and laboratory analysis:

- Unifirst – The monthly compliance self-monitoring report and laboratory analysis were received and reviewed. No deficiencies were noted. Monthly surcharges for conventional pollutants above residential thresholds were calculated in the amount of \$1,825.08 and submitted to the Broken Arrow Finance Department.
- Comgraphx – A notice of violation was issued to Comgraphx for a silver violation that occurred in April. The quarterly compliance monitoring was performed in May and the report was received and reviewed by Pretreatment staff. The samples were taken at the Flexographic Plate process as well as the Screen Recovery Room. No deficiencies were noted. The silver recovery room was not sampled or discharged during this sampling event.
- Haikey Creek Wastewater Treatment Plant – The quarterly influent and effluent priority pollutant samples were collected at the end of May.

June 2018:

Fats, Oil & Grease (FOG) Program Activities

1. Food Handling Establishment Inspections:

- City of Broken Arrow Pretreatment staff performed 29 food handling establishment inspections in the month of June. Staff reviewed manifests for grease interceptor maintenance, inspected the interceptors, and discussed best management practices with management. Establishments with interceptors that were improperly maintained or in need of repair were given 15 days to correct the deficiency. Re-checks were done for non-compliance issues.

2. Community Awareness and Pollution Prevention

- City of Broken Arrow Pretreatment staff attended the Waterford park II Homeowner's Association Meeting and spoke about Fats, Oil & Grease pollution prevention at home.

Industrial Pretreatment Activities:

1. Compliance reports and laboratory analysis:

- Unifirst – The monthly compliance self-monitoring report and laboratory analysis were received and reviewed. No deficiencies were noted. Monthly surcharges for conventional pollutants above residential thresholds were calculated in the amount of \$1,804.40 and submitted to the Finance Department.
- Haikey Creek Wastewater Treatment Plant – Influent and effluent priority pollutant analysis was received and reviewed. No deficiencies were noted.
- Comgraphx – Monthly compliance self-monitoring report and laboratory analysis were received and reviewed for the screen room. Silver was above the permit limit. An inspection was

scheduled and sampling will be performed by City staff. More details will be reported from the inspection.

July 2018:

Fats, Oil & Grease (FOG) Program Activities

1. Food Handling Establishment Inspections:

- City Pretreatment staff performed 42 food handling establishment inspections in the month of June. Staff reviewed manifests for grease interceptor maintenance, inspected the interceptors, and discussed best management practices with management. Establishments with interceptors that were improperly maintained or in need of repair were given 15 days to correct the deficiency. Re-checks were done for non-compliance issues.

Industrial Pretreatment Activities:

1. Compliance reports and laboratory analysis:

- Unifirst – The compliance self-monitoring and laboratory analysis reports were received and reviewed. No deficiencies were noted. Monthly surcharges for conventional pollutants above residential thresholds were calculated in the amount of \$2,100.20 and submitted to the Finance Department.
- Comgraphx – Pretreatment staff performed the yearly wastewater discharge compliance inspection and "Control Authority" sampling. Amendments were made to the wastewater discharge permit as a result of the inspection. It was discovered that Comgraphx has been having silver violations coming from both process waste streams. We initially asked Comgraphx to perform permit compliance sampling at the oil/water separator where process waste streams from the screen printing and photo processing rooms meet. Permit sampling locations were modified to separate the laboratory analysis at the two waste streams. Pretreatment staff performed laboratory analysis at each process waste stream during the inspection. No violations were revealed on the laboratory analysis reports. However, Comgraphx has been asked to modify standard operating procedures to ensure continued compliance at each sampling location. Sampling will be increased to monthly at each location to monitor compliance more closely.
- CSI Aerospace - Pretreatment staff performed the yearly wastewater discharge compliance inspection and "Control Authority" sampling. No deficiencies were noted on the inspection. Laboratory results from the "Control Authority" sampling have not come in yet. The quarterly permit compliance self-monitoring and laboratory analysis reports for sampling done by CSI were received and reviewed. No deficiencies were noted.

This concludes my report. Thank you for your continued support of the City of Broken Arrow/RMUA industrial pretreatment program. Should you have any questions or concerns please do not hesitate to contact me at the Broken Arrow pretreatment office.

Sincerely,

A handwritten signature in black ink that reads "Lauren Wilson". The script is fluid and cursive, with the first name "Lauren" and last name "Wilson" clearly distinguishable.

Lauren Wilson

Pretreatment Coordinator

City of Broken Arrow

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