



Tuesday, October 29, 2019

Roshini Schroeder, EPS VI
Municipal Pretreatment Coordinator
Oklahoma Department of Environmental Quality
Water Quality Division
Municipal Wastewater Field Inspection/Enforcement Section
707 N. Robinson
Oklahoma City, OK 73102

Re: FY 2019 Pretreatment Annual Report to DEQ
Broken Arrow Municipal Authority
Industrial Pretreatment Program for:
Lynn Lane Wastewater Treatment Plant
Oklahoma Pollutant Discharge Elimination System
(OPDES) Permit Number OK0040053

Dear Mrs. Schroeder:

The City of Broken Arrow Industrial Pretreatment Program Annual Report for the period October 1, 2018 through September 30, 2019 is hereby submitted. Please note the following comments in addition to the required forms:

Report of Changes to the Approved Pretreatment Program

No changes have been made to the Broken Arrow Municipal Authority Pretreatment Program. Technically based local limits have been calculated and will be submitted as a separate attachment for your approval. The City of Broken Arrow is in the process of revising the sewer use ordinance to update the following areas:

- Enforcement response plan for commercial users
- Revised technically based local limits for industrial users
- Waste hauler permitting
- Prohibitions on dental amalgam and hazardous pharmaceuticals.

A copy of the draft ordinance will be submitted to you as a substantial pretreatment program modification.

Industrial User (IU) Wastewater Survey

The IU Wastewater Survey is continually updated in Broken Arrow. All new non-residential utility customers are given a one-page short survey to fill out before they can obtain water service. The surveys are then forwarded to the pretreatment office. A comprehensive IU Survey is performed every 5 years and will be performed next in 2022.

Report on Pass Through, Upset and/or Interference

Regarding Influent and Effluent priority pollutant scans, all parameters were below both maximum allowable headworks loadings (MAHL) and Oklahoma Water Quality Criteria.

There were no instances of pass through, upset, or interference resulting in OPDES permit violations that were known or suspected to be caused by industrial users in the Lynn Lane Wastewater Basin.

Report on Other Administrative Activities

During the 2018-2019 pretreatment year, one Industrial Users was significantly non-compliant (SNC). Flight Safety International failed to sample for the October to December 2018 Quarter. A notice of violation was issued to Flight Safety in January of 2019 advising them of the violation and significant non-compliance status. Please see the attached letter



in Section 4. A legal ad was published in the Tulsa World on October 25, 2019 listing Flight Safety International as significantly non-compliant. A copy of the affidavit of publication is attached for you in Section 5.

The City of Broken Arrow issued Blue Bell Creameries a consent order in January of 2017 that required construction of a pretreatment system by January 2019. In December 2018, Blue Bell was granted an extension and the construction deadline was moved to May of 2019. Blue Bell completed construction of the pretreatment system and began operation in April 2019. Blue Bell has met all of the Consent Order milestones to date, a final consent order payment of \$1,000 was received in May 2019, as required.

Surcharges were suspended during the consent order and started up again with the start of the pretreatment system. A surcharge total of \$56,321.19 was billed to Blue Bell from May until September 2019 for biochemical oxygen demand (BOD), total suspended solids (TSS), and oil & grease above residential thresholds. A detailed report of the first 6-months of operation is due to the City of Broken Arrow Pretreatment Office by January 2, 2020.

Blue Bell had 18 permit violations from October 2018 to March 2019. After the pretreatment system began operation in April, Blue Bell has had one permit violation. Blue Bell reported that the violation for biochemical oxygen demand was due to the agitator in the equalization tank malfunctioning and the equalization tank being drained below the 6-foot cutoff level. The City of Broken Arrow has asked Blue Bell to implement a cleaning schedule for the equalization tank in which the solids will be hauled offsite and begin performing operational procedures to ensure the permit will not be violated. I have attached Blue Bell's 24-hour notification in Section 6 for your review.

Operations at Broken Arrow Powder Coating (Location 1) were halted effective February 9, 2018. The City of Broken Arrow did not perform an inspection or control authority sample at Location 1. Mullin Plumbing had three zinc and one copper violation during this timeframe. The violations were on 4/11/19, 5/10/19, and 9/18/19. A notice of violation was issued each time. The high metals results correspond with total suspended solids results over 2,000 mg/L. Mullin Plumbing has been asked to take steps to reduce the suspended solids from their wastewater discharge. I have attached the notices of violation for your review in Section 3.

City of Broken Arrow mailed one-time compliance reports to dental dischargers in January. We will be visiting each facility before the July 2020 deadline to ensure compliance with 40 CFR 441.

Training

City of Broken Arrow Pretreatment staff attended the following training between October 1, 2018 and September 30, 2019:

- EPA Region VI Pretreatment Association Workshop – 15 hours
- HAZWOPER Renewal – 8 hours

Pollution Prevention

The City of Broken Arrow places a high value on pollution prevention. Please read the following list of activities for FY 2019:

- City of Broken Arrow conducted 321 food handling establishment inspections and 66 automotive inspections during FY 2019. The inspector checks grease/sand interceptors and oil/water separators for proper maintenance, looks at maintenance manifests, speaks with management about best management practices, and inspects waste oil recycle areas.
- City of Broken Arrow mails letters to residents upstream from sanitary sewer overflows that were caused by grease and other "flushable" wipes. The letters encourage pollution prevention in the home by telling residents what items they should not put in a drain or flush. The letters also inform residents of the City's backflow preventer requirement.
- Broken Arrow MET Recycle Center Cooking oil recycled = 922 gal



- City Pretreatment staff participated in the 2019 Mayor's Challenge for Water Conservation which lasted the entire month of April. Broken Arrow's Mayor Thurmond joined mayors across the nation in asking residents to be more water-wise by making a pledge to change daily habits and perform easy tasks at home to save money, conserve water and energy, and promote water quality in local watersheds. Pretreatment staff hosted a booth at the Farmer's Market every Saturday in April where water conservation/water quality brochures and 4 rain barrels were given away. Water Conservation activity books were distributed to Broken Arrow, Bixby, and Union Elementary Students in the Broken Arrow City Limits. Staff also gave a presentation about water conservation to the 2nd grade students at Country Lane Elementary. The challenge was a wonderful opportunity for Pretreatment staff to speak to the public about water quality and pollution prevention in the home. Broken Arrow did an outstanding job in the challenge, coming in 12th out of more than 1000 cities in our population category.

This concludes the summary; the annual report is attached. Thank you for the guidance and support you provide to our Pretreatment Program. If you have any questions, please contact me at (918) 259-7000 ext. 7220 lkimbrough@brokenarrowok.gov.

Sincerely,

Lauren Kimbrough
Pretreatment Coordinator
City of Broken Arrow

cc: Kenneth Schwab, Assistant City Manager of Operations
Charles Vokes, Utilities Director
Stacy Thornton, Assistant Utilities Director

FY 2019 INDUSTRIAL PRETREATMENT PROGRAM ANNUAL REPORT TO:

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY
WATER QUALITY DIVISION
ENFORCEMENT SECTION



BROKEN ARROW

Where opportunity lives

INDUSTRIAL PRETREATMENT PROGRAM FOR:

BROKEN ARROW MUNICIPAL AUTHORITY
LYNN LANE WASTEWATER TREATMENT PLANT
OPDES PERMIT NUMBER OK0040053
OCTOBER 1, 2018 THROUGH SEPTEMBER 30, 2019



BROKEN ARROW MUNICIPAL AUTHORITY
LYNN LANE WASTEWATER TREATMENT PLANT
INDUSTRIAL PRETREATMENT PROGRAM

CERTIFICATION STATEMENT

"I hereby 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 gather and evaluate 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."

Broken Arrow Municipal Authority
Control Authority

Oct. 1, 2018 to Sep. 30, 2019
Reporting Period

Stacy Thornton
Name of Responsible Official

Assistant Utilities Director
Title

Stacy Thornton
Signature

SECTION 1:

PRETREATMENT PERFORMANCE SUMMARY

PRETREATMENT PERFORMANCE SUMMARY (PPS)

Page 1 of 2

I. General Information

Broken Arrow Municipal Authority, Lynn Lane Wastewater Treatment Plant
Control Authority Name

485 North Poplar Avenue
Address

Broken Arrow, OK, 74012
City, State, Zip

Lauren Kimbrough, Pretreatment Coordinator, City of Broken Arrow
Contact Person, Position

(918) 259-7000 Ext. 7220
Contact Telephone

OK0040053
OPDES Permit Number(s)

Begin Date: 10/1/18
Reporting Period

End Date: 9/30/19

II. Significant Industrial User Compliance

Record the Number of SIU Who:

SIGNIFICANT INDUSTRIAL USERS

Categorical

Non-categorical

I.	a. Submitted a BMR	<u>0</u>	N/A
	b. Were Required to Submit a BMR	<u>0</u>	N/A
2.	a. Submitted a 90-Day Compliance Report	<u>0</u>	N/A
	b. Were Required to Submit a 90-Day Report	<u>0</u>	N/A
3.	a. Submitted Required Self-Monitoring Reports	<u>3</u>	<u>3</u>
	b. Were Required to Submit Self-Monitoring Reports	<u>3</u>	<u>3</u>
4.	a. Met a Compliance Schedule	<u>0</u>	<u>1</u>
	b. Were Required to Meet a Compliance Schedule	<u>0</u>	<u>1</u>
5.	a. Were in Significant Noncompliance (SNC)	<u>1</u>	<u>0</u>

Additional Information:

6.	Total Number of SIU	<u>4</u>	<u>3</u>
7.	Rate of SNC for <u>all</u> SIU (categorical & non-categorical)		<u>12.5 %</u>

PRETREATMENT PERFORMANCE SUMMARY (PPS)

Page 2 of 2

III. Compliance Monitoring Program

<u>Record the Number of:</u>		<u>SIGNIFICANT INDUSTRIAL USERS</u>	
		<u>Categorical</u>	<u>Non-categorical</u>
I.	a. Issued Control Documents	<u>0</u>	<u>1</u>
	b. Required Control Documents	<u>0</u>	<u>1</u>
2.	a. Facilities Inspected	<u>3</u>	<u>4</u>
	b. Inspections Conducted	<u>3</u>	<u>5</u>
3.	a. Facilities Sampled	<u>3</u>	<u>4</u>
	b. Samplings Conducted	<u>14</u>	<u>81</u>

IV. Enforcement Actions

<u>Record the Number of:</u>		<u>SIGNIFICANT INDUSTRIAL USERS</u>	
		<u>Categorical</u>	<u>Non-categorical</u>
1.	a. Compliance Schedules Issued	<u>0</u>	<u>0</u>
	b. Compliance Schedules Required	<u>0</u>	<u>0</u>
2.	Notices of Violation (NOV) Issued	<u>1</u>	<u>2</u>
3.	Administrative Orders (AO) Issued	<u>0</u>	<u>0</u>
4.	Civil Suits Filed	<u>0</u>	<u>0</u>
5.	Criminal Suits Filed	<u>0</u>	<u>0</u>
6.	Significant Violators Published	<u>1</u>	<u>0</u>
7.	SIU that were Assessed Penalties	<u>0</u>	<u>1</u>
8.	Dollars of Penalties Collected	<u>\$ 0</u>	<u>\$ 57,321.19</u>
9.	Other Actions (sewer bans, etc.)	<u>0</u>	<u>0</u>

SECTION 2:

SIGNIFICANT INDUSTRIAL USERS

PRETREATMENT PROGRAM STATUS REPORT
Updated Significant Industrial User List

SIGNIFICANT INDUSTRIAL USER (SIU) NAME AND ADDRESS	SIC CODE	CATEGORICAL/ NONCATEGORICAL	CONTROL DOCUMENT		ADDED/ DELETED (A, D, N/A)	NUMBER of TIMES SAMPLED		NUMBER of TIMES INSPECTED	COMPLIANCE STATUS (C, NC, SNC, N/A)			
			Y/N	Last Action		City	SIU		BMR	REPORTS		EFFLUENT LIMITS
										90-Day Compliance	Self- Monitoring	
Republic Services/Broken Arrow Landfill 1225 N. 161 E Ave.	4953	NONCATEGORICAL	Y	11/1/2017	N/A	1	2	1	N/A	N/A	C	C
Blue Bell Creameries* 8201 E. HWY 51	2024	NONCATEGORICAL	Y	11/4/2017	N/A	2	70	2	N/A	N/A	C	NC
Russelectric 1215 E. Houston	3471	CATEGORICAL	Y	11/4/2017	N/A	1	4	1	N/A	N/A	C	C
Broken Arrow Powder Coatings ** 809 N. 16th	3479	CATEGORICAL	Y	6/1/2018	N/A	0	0	0	N/A	N/A	N/A	N/A
Flight Safety International*** 700 N. 9th St.	3471	CATEGORICAL	Y	6/16/2018	N/A	1	3	1	N/A	N/A	SNC	C
PACCAR Winch 800 E. Dallas St.	3479	CATEGORICAL	Y	08/26/18	N/A	1	4	1	N/A	N/A	C	C
Mullin Plumbing Septic Dewatering Station 100 S. 23rd St.	7699	NONCATEGORICAL	Y	9/1/2018	N/A	1	4	1	N/A	N/A	C	NC
Exterran 20602 E. 81st St. Broken Arrow, OK 74014	3533	NONCATEGORICAL	Y	7/12/2019	A	1	0	1	N/A	N/A	C	C

Additional Notes:

*Blue Bell Creameries is under a consent order. Please see the update that is attached Section 3: Non-Compliant Industrial Users and Section 6 Compliance Schedules.

**Broken Arrow Powder Coating shut down operation at this facility on February 9, 2016. They opted to keep the permit active but did not discharge in the timeframe of October 1, 2018 and September 30, 2019.

*** Flight Safety International failed to sample for the October to December 2018 quarter as required. Please see the details in Section 4 Significantly Non-Compliant Industrial Users.

SECTION 3:

NON-COMPLIANT INDUSTRIAL USERS

[illegible]

Additional Notes: A 24-hour notification for Blue Bell is attached. Notices of violation for Mullin Plumbing are attached.

**CITY OF BROKEN ARROW / LYNN LANE
WASTEWATER TREATMENT PLANT
24-HOUR NOTIFICATION FOR PERMIT EXCURSIONS**

FACSIMILE TRANSMITTAL SHEET

TO: Industrial Pretreatment Coordinator	FROM: Blue Bell Creameries; Brian Baysinger
COMPANY: City of Broken Arrow/Lynn Lane WWTP	DATE: 10/14/2019
FAX NUMBER: N/A	TOTAL NO. OF PAGES INCLUDING COVER: 1
PHONE NUMBER: (918) 259-7000 x 7220	SENDER'S PERMIT NUMBER: BA007
RE: BOD lbs. overages	

☒ URGENT ☐ FOR REVIEW ☐ PLEASE COMMENT ☐ PLEASE REPLY ☐ PLEASE RECYCLE

NOTES/COMMENTS:

Description of event: BOD result on 9/27/19 composite sample caused us to be over permitted limit on maximum lbs. per day for BOD'S.

Date/Time of event: 9/27/19 composite sample.

Impact on compliance: BOD lbs. per day over permitted limits.

Suspected Cause: Due to mechanical failure, the agitator for our EQ tank was removed and shipped to manufacturer for repairs under warranty on 9/17/19. In absence of an agitator, only air injection was being used at the pretreatment plant. The air pump operates on a VFD so as the water level in the EQ tank becomes lower the pump slows down. This caused the water in the tank to not mix completely. The water pretreatment plant operator also pulled water level in the EQ tank too low (pulled down to 3', normally pulls to 6' and shuts off) which caused settled materials in EQ tank to be pulled into sampler.

Reviewed By

MAY 16 2019

LW

CITY OF BROKEN ARROW



RECEIVED
MAY 15 19

UTILITIES DEPARTMENT /
PRETREATMENT OFFICE

24-HOUR NOTIFICATION FOR PERMIT EXCURSIONS

TO:	FROM:
Industrial Pretreatment Coordinator	Robert Morris, CEO, Mullin Plumbing
COMPANY:	DATE:
City of Broken Arrow / Lynn Lane WWTP	4-11
FAX NUMBER:	TOTAL NO. OF PAGES INCLUDING COVER:
	1
EMAIL:	SENDER'S PERMIT NUMBER:
lwilson@brokenarrowok.gov	BA 026
RE:	
Permit Excursion	

☒ URGENT ☐ FOR REVIEW ☐ PLEASE COMMENT ☐ PLEASE REPLY ☐ PLEASE RECYCLE

NOTES/COMMENTS:

Description of event: HIGH ZINK LEVEL IN DAILY TEST (LAB)

Duration of event: 1 DAY 7.76 mg/L

Date/Time of event: 10 AM

Impact on compliance: Violation of Wastewater Discharge Permit BA026

Suspected Cause:

Prevention:



Thursday, May 30, 2019

Robert Morris, CEO
Mullin Plumbing Residential Septic System Dewatering Station
100 South 23rd Street
Broken Arrow, OK 74014

Re: NOTICE OF VIOLATION OF CITY OF BROKEN ARROW WASTEWATER DISCHARGE PERMIT # BA 026

Dear Mr. Morris,

Enclosed is a notice of violation (NOV) of Wastewater Discharge Permit # BA 026 for the Mullin Plumbing Residential Septic System Dewatering Station located at 100 South 23rd Street in Broken Arrow. The monthly compliance monitoring report that was submitted to the Broken Arrow Pretreatment Office revealed a zinc result of 7.76 mg/L for the sample taken on April 11, 2019. I received your monthly report on May 15, 2019 and after discovery of the violation you submitted a 24-hour notification of the violation in writing. The laboratory report shows a date of April 19, 2019 on the front page indicating the laboratory reported the results to Mullin Plumbing on that date. Any future violations must be reported within 24-hours of Mullin Plumbing's receipt of the laboratory report showing the violation. Because the Zinc analysis exceeded the EPA's technical review criteria of: (permit limit x 1.2), I have attached documentation that describes the process of calculating significant non-compliance for your review. Technical Review Criteria Permit violations that exceed 33% of the total of the samples taken for any parameter will result in Mullin Plumbing being "Significantly Non-Compliant".

Attached is a form for your response to the violation. Please sign the enclosed forms, describe the suspected cause of the violation and any abatement efforts, and return to the City of Broken Arrow Pretreatment Office within five days. Should you have any questions or concerns regarding this correspondence, do not hesitate to contact me at (918) 259-7000 ext. 7220.

Sincerely,

Lauren Wilson
Pretreatment Coordinator
City of Broken Arrow
485 N. Poplar Ave.
Broken Arrow, OK 74012
(918) 259-7000 Ext. 7220
lwilson@brokenarrowok.gov

cc: Charles Vokes, Utilities Director, City of Broken Arrow



BROKEN ARROW

Utilities Department Industrial Pretreatment Program Notice of Violation

In accordance with § 24-506 of the Broken Arrow Code of Ordinances this instrument serves as a written notice of violation of the industrial wastewater discharge permit and/or requirements of federal, State or local regulations pertaining to wastewater discharge.

Discharger: Mullin Plumbing Residential Septic System Dewatering Station

Address of Discharge: 100 S. 23rd St.

Permit#: BA 026 Date Notice Issued: 5/30/19

Control Authority Issuing Representative: THE CITY OF BROKEN ARROW

Date Violation occurred	In violation of	Nature of violation	Fine
4/11/19	Wastewater Discharge Permit # BA 026	Zinc result is 7.76 mg/L which is 0.55 times over the daily maximum of 5.0 mg/L. This is a technical review criteria (TRC) violation. TRC is calculated as the permit limit x 1.2. The TRC limit is 6.0 mg/L.	No fine is required. City of Broken Arrow Pretreatment Program Enforcement Response Plan requires a notice of violation.

IMPORTANT: VIOLATION(S) MUST CEASE AND DESIST BY: IMMEDIATELY

Receipt of Notice Acknowledged by Discharger:

Robert Morris
*Authorized Signatory for Industrial Discharger (Print)

Ceo
Title

Date

5-31-19

Signature

[Signature]

[Signature]
Charles Vokes, Utilities Director

Date

May 30, 2019

Within 5 days of the date of this notice, return the signed form with a written response identifying the suspected cause of the violation(s), the corrective measures taken to abate the violation(s), the date(s) of abatement, and measures to prevent recurrence to:

City of Broken Arrow
P.O. Box 610
Broken Arrow, OK 74013
Attn: Industrial Pretreatment Coordinator

(one) 918-259-7000 ext. 7220, (fax) 918-259-7010, (email) lwilson@brokenarrowok.gov. Fax or email may be used to meet the 5-day requirement. Original may be included with next monthly report.



BROKEN ARROW

Industrial User Response to Violation

Discharger: Mullin Plumbing Residential Septic System Dewatering Station

Address of Discharger: 100 South 23rd Street, Broken Arrow, OK 74014

Permit#: BA 026

Date Occurred	Nature of Violation	Suspected Cause	Corrective Measure(s)	Date of Abatement	Measure(s) to Prevent Recurrence
4/11/19	Zinc above the daily maximum and Technical Review Criteria (TRC) limit	possible storm water infiltration into unknown systems	Completely Cleaned System	6-3-19	Added additional filtration

(Attach additional pages if necessary)

Authorized Signatory for Industrial Discharger (Print)

Title

Signature

Date

Following 24-hour notice, return this completed form within 5 days of becoming aware of the violation to:

City of Broken Arrow,
Post Office Box 610
Broken Arrow, OK 74013
Attn: Industrial Pretreatment Coordinator

PHONE: (918) 259-7000 ext. 7220, FAX: (918) 259-7010, EMAIL: lwilson@brokenarrowok.gov
Fax or email may be used to meet 5 day requirement. Original may be included with next monthly report.

RECEIVED
6-3-19

CITY OF BROKEN ARROW



Emailed
11:28 AM. 6-3-19
Kun

Reviewed By: *[Signature]*

JUN 17 2019

UTILITIES DEPARTMENT /
PRETREATMENT OFFICE

24-HOUR NOTIFICATION FOR PERMIT EXCURSIONS

TO:	FROM:
Industrial Pretreatment Coordinator	Robert Morris, CEO, Mullin Plumbing
COMPANY:	DATE:
City of Broken Arrow/Lynn Lane WWTP	5-10-19
FAX NUMBER:	TOTAL NO. OF PAGES INCLUDING COVER:
	1
EMAIL:	SENDER'S PERMIT NUMBER:
lwilson@brokenarrowok.gov	BA 026
RE:	
Permit Excursion	

☒ URGENT ☐ FOR REVIEW ☐ PLEASE COMMENT ☐ PLEASE REPLY ☐ PLEASE RECYCLE

NOTES/COMMENTS:

Description of event: HIGH ZINC LEVEL IN DAILY LAB TEST
HIGH COPPER LEVEL IN DAILY LAB TEST

Duration of event: 1 DAY

Date/Time of event: 5-10 sample taken, 5-20 we were notified

Impact on compliance: Violation of Wastewater Discharge Permit BA026

Suspected Cause: UNKNOWN

Prevention: CLEAN OUT SYSTEM & INSTALL ADDITIONAL FILTRATION MEDIA

Robert Morris

From: Robert Morris
Sent: Monday, June 03, 2019 11:28 AM
To: Wilson, Lauren
Subject: Violation notice
Attachments: violation notice.pdf

I am sending this notice that I became aware of this morning. I had a meeting with Nick our environmental manager this morning after the notice I received regarding the 24hr notification. We are all on the same page now in relation to the time line of the 24hr notification now. I apologize for this late notice. The meeting I was hoping to have with you is in respect to the high metal samples we are getting, as we are only pumping residential septic systems. We are installing additional filtration media in our system. We currently are not dumping at our site and doing a complete cleaning of the system again. I would like to meet with you when you return from vacation. Have a great time.

Robert Morris

Mullin Plumbing, Inc.

118 S Elm Place
Broken Arrow, OK. 74012
918-258-6636



Friday, July 12, 2019

Robert Morris, CEO
Mullin Plumbing Residential Septic System Dewatering Station
100 South 23rd Street
Broken Arrow, OK 74014

Re: NOTICE OF VIOLATION OF CITY OF BROKEN ARROW WASTEWATER DISCHARGE PERMIT # BA 026

Dear Mr. Morris,

Enclosed is a notice of violation (NOV) of Wastewater Discharge Permit # BA 026 for the Mullin Plumbing Residential Septic System Dewatering Station located at 100 South 23rd Street in Broken Arrow. The monthly compliance monitoring report that was submitted to the Broken Arrow Pretreatment Office in June revealed a zinc result of 7.02 mg/L and a copper result of 4.21 mg/L for the sample taken on May 10, 2019 which are above the permitted limits. You submitted a 24-hour notification of the violation to me in writing on June 3, 2019, which was 14 days after the laboratory emailed the report. The laboratory report shows a date of May 20, 2019 on the front page indicating the laboratory reported the results to Mullin Plumbing on that date. You emailed me on June 3rd stating that you had received the written notification from me mailed on May 30th, requiring reporting of violations within 24 hours instead of with the monthly report. Your email stated that you would do that from now on.

Because the Zinc analysis exceeded the EPA's technical review criteria of: (permit limit x 1.2), I have attached documentation that describes the process of calculating significant non-compliance for your review. Technical Review Criteria Permit violations that exceed 33% of the total of the samples taken for any parameter will result in Mullin Plumbing being "Significantly Non-Compliant". In our meeting on July 1, 2019, you told me that you have implemented measures to reduce the amount of solids that are being discharged into the city sewer system from the septic system dewatering station. You also indicated that grab samples are being taken from the final dewatering tank instead of from the final cleanout/sample port. Please begin taking samples from the final cleanout/sampling port to see if the measures you implemented are reducing the amount of metals being discharged, and to get a more representative sample.

Attached is a form for your response to the violation. Please sign the enclosed forms, document the suspected cause of the violation and any abatement efforts, including the ones we have discussed, and return to the City of Broken Arrow Pretreatment Office within five days. Should you have any questions or concerns regarding this correspondence, do not hesitate to contact me at (918) 259-7000 ext. 7220.

Sincerely,

Lauren Wilson
Pretreatment Coordinator
City of Broken Arrow
485 N. Poplar Ave.
Broken Arrow, OK 74012
(918) 259-7000 Ext. 7220
lwilson@brokenarrowok.gov

cc: Charles Vokes, Utilities Director, City of Broken Arrow

Reviewed By

JUL 16 2019



BROKEN ARROW

RECEIVED
7-16-19

Industrial User Response to Violation

Discharger: Mullin Plumbing Residential Septic System Dewatering Station

Address of Discharger: 100 South 23rd Street, Broken Arrow, OK 74014

Permit#: BA 026

Date Occurred	Nature of Violation	Suspected Cause	Corrective Measure(s)	Date of Abatement	Measure(s) to Prevent Recurrence
5/10/19	Zinc above the daily maximum and Technical Review Criteria (TRC) limit	process of Grab Sample being taken from tank	Completely cleaned System	week of 6/11/19 6/11/19	Additional filters installed take samples from final Baffle instead of from tank
5/10/19	Copper above daily maximum	process of Grab Sample being taken from tank	Completely cleaned System	week of 6/11/19 6/11/19	Additional filters installed take samples from final Baffle instead of from tank

(Attach additional pages if necessary)

Authorized Signatory for Industrial Discharger (Print)

Title

Signature

Date

Following 24-hour notice, return this completed form within 5 days of becoming aware of the violation to:

City of Broken Arrow,
Post Office Box 610
Broken Arrow, OK 74013
Attn: Industrial Pretreatment Coordinator

PHONE: (918) 259-7000 ext. 7220, FAX: (918) 259-7010, EMAIL: lwilson@brokenarrowok.gov
Fax or email may be used to meet 5 day requirement. Original may be included with next monthly report.

Reviewed By

JUL 16 2019



BROKEN ARROW

RECEIVED
7-16-19

Utilities Department
Industrial Pretreatment Program
Notice of Violation

In accordance with § 24-506 of the Broken Arrow Code of Ordinances this instrument serves as a written notice of violation of the industrial wastewater discharge permit and/or requirements of federal, State or local regulations pertaining to wastewater discharge.

Discharger: Mullin Plumbing Residential Septic System Dewatering Station

Address of Discharge: 100 S. 23rd St.

Permit#: BA 026 Date Notice Issued: 7/12/19

Control Authority Issuing Representative: THE CITY OF BROKEN ARROW

Date Violation occurred	In violation of	Nature of violation	Fine
5/10/19	Wastewater Discharge Permit # BA 026	Zinc result reported at 7.02 mg/L which is 0.4 times over the daily maximum of 5.0 mg/L. This is a technical review criteria (TRC) violation. TRC is calculated as the permit limit x 1.2. The TRC limit is 6.0 mg/L.	No fine is required. City of Broken Arrow Pretreatment Program Enforcement Response Plan requires a notice of violation.
5/10/19	Wastewater Discharge Permit # BA 026	Copper result reported at 4.21 mg/L which is .05 times over the daily maximum of 4.0 mg/L.	No fine is required. City of Broken Arrow Pretreatment Program Enforcement Response Plan requires a notice of violation.

IMPORTANT: VIOLATION(S) MUST CEASE AND DESIST BY: IMMEDIATELY

Receipt of Notice Acknowledged by Discharger:

Robert Morris
*Authorized Signatory for Industrial Discharger (Print)

Ceo
Title

7-16-19
Date

[Signature]
Signature

[Signature]
Charles Vokes, Utilities Director

12 July 19
Date

Within 5 days of the date of this notice, return the signed form with a written response identifying the suspected cause of the violation(s), the corrective measures taken to abate the violation(s), the date(s) of abatement, and measures to prevent recurrence to:

City of Broken Arrow
P.O. Box 610
Broken Arrow, OK 74013
Attn: Industrial Pretreatment Coordinator

one) 918-259-7000 ext. 7220, (fax) 918-259-7010, (email) lwilson@brokenarrowok.gov. Fax or email may be used to meet the 5-day requirement. Original may be included with next monthly report.

CITY OF BROKEN ARROW



UTILITIES DEPARTMENT /
PRETREATMENT OFFICE

24-HOUR NOTIFICATION FOR PERMIT EXCURSIONS

TO:	Industrial Pretreatment Coordinator	FROM:	Robert Morris, CEO, Mullin Plumbing
COMPANY:	City of Broken Arrow/Lynn Lane WWTP	DATE:	9/26
FAX NUMBER:		TOTAL NO. OF PAGES INCLUDING COVER:	1
EMAIL:	lwilson@brokenarrowok.gov	SENDER'S PERMIT NUMBER:	BA 026
RE:	Permit Excursion		

☒ URGENT ☐ FOR REVIEW ☐ PLEASE COMMENT ☐ PLEASE REPLY ☐ PLEASE RECYCLE

NOTES/COMMENTS:

Description of event:

Duration of event: 9/18 ZINC VIOLATION ON REPORT

Date/Time of event: 9/26

Impact on compliance: Violation of Wastewater Discharge Permit BA026

Suspected Cause: COLLECTED SOLIDS DURING GRAB NO USAGE THAT DAY

Prevention: 4 TEST DAY BEFORE WAS FINE

GET WITE GREEN COUNTRY 4 SEE IF THEY DID
SOMETHING DIFFERENT FOR COLLECTING



Tuesday, October 29, 2019

Robert Morris, CEO
Mullin Plumbing
118 S. Elm Pl.
Broken Arrow, OK 74012

Re: NOTICE OF VIOLATION OF CITY OF BROKEN ARROW WASTEWATER DISCHARGE PERMIT # BA 026

Dear Mr. Morris,

Enclosed is a notice of violation (NOV) of Wastewater Discharge Permit # BA 026 for the Mullin Plumbing Residential Septic System Dewatering Station located at 100 South 23rd Street in Broken Arrow. The monthly compliance monitoring report that was submitted to the Broken Arrow Pretreatment Office in October revealed a zinc result of 7.19 mg/L for the sample collected on 9/18/19 which is above the permitted limit. Federal and state pretreatment regulations require a retest within 30 days of a violation. Please schedule your monthly sampling to meet this requirement.

The total suspended solids result from the day of this violation is 2,410 mg/L. As we have previously discussed, heavy metals settle into the sludge of a septic tank. Filtering the suspended solids will reduce heavy metal content of the wastewater discharged from the Mullin Plumbing Residential Septic System Dewatering Station. Please see the attached table. Each permit violation for heavy metals corresponds with a total suspended solids result of 2,000 mg/L or higher. Please take steps to reduce the solids content discharged to the City of Broken Arrow sanitary sewer system.

Attached is a form for your response to the violation. Please sign the enclosed forms, document the suspected cause of the violation as well as any abatement efforts being made, and return to the City of Broken Arrow Pretreatment Office within five days. Should you have any questions or concerns regarding this correspondence, do not hesitate to contact me at (918) 259-7000 ext. 7220.

Sincerely,

Lauren Kimbrough
Pretreatment Coordinator
City of Broken Arrow
485 N. Poplar Ave.
Broken Arrow, OK 74012
(918) 259-7000 Ext. 7220
lkimbrough@brokenarrowok.gov

cc: Charles Vokes, Utilities Director, City of Broken Arrow
Stacy Thornton, Assistant Utilities Director, City of Broken Arrow



BROKEN ARROW

Utilities Department Industrial Pretreatment Program Notice of Violation

In accordance with § 24-506 of the Broken Arrow Code of Ordinances this instrument serves as a written notice of violation of the industrial wastewater discharge permit and/or requirements of federal, State or local regulations pertaining to wastewater discharge.

Discharger: Mullin Plumbing Residential Septic System Dewatering Station

Address of Discharge: 100 S. 23rd St.

Permit#: BA 026 Date Notice Issued: 10/29/19

Control Authority Issuing Representative: THE CITY OF BROKEN ARROW, UTILITIES DEPARTMENT, PRETREATMENT OFFICE

Date Violation occurred	In violation of	Nature of violation	Fine
9/18/19	Wastewater Discharge Permit # BA 026	Zinc result reported at 7.19 mg/L which is 0.45 times over the daily maximum of 5.0 mg/L. This is a technical review criteria (TRC) violation. TRC is calculated as the permit limit x 1.2. The TRC limit is 6.0 mg/L.	No fine is required. City of Broken Arrow Pretreatment Program Enforcement Response Plan requires a notice of violation.

IMPORTANT: VIOLATION(S) MUST CEASE AND DESIST IMMEDIATELY

Receipt of Notice Acknowledged by Discharger:

*Authorized Signatory for Industrial Discharger (Print)

Title

Date

Signature

Stacy Thornton
Stacy Thornton, Assistant Utilities Director

10/28/19
Date

Within 5 days of the date of this notice, return the signed form with a written response identifying the suspected cause of the violation(s), the corrective measures taken to abate the violation(s), the date(s) of abatement, and measures to prevent recurrence to:

City of Broken Arrow
P.O. Box 610
Broken Arrow, OK 74013
Attn: Utilities Department, Pretreatment Office

918-259-7000 ext. 7220, (fax) 918-259-7010, (email) lkimbrough@brokenarrowok.gov. Email may be used to meet the 5-day requirement. The original may be included with next monthly report.

*Authorized Signatory is the person who signed the wastewater discharge permit or the designee in Attachment B.



BROKEN ARROW

Industrial User Response to Violation

Discharger: Mullin Plumbing Residential Septic System Dewatering Station

Address of Discharger: 100 South 23rd Street, Broken Arrow, OK 74014

Permit#: BA 026

Date Occurred	Nature of Violation	Suspected Cause	Corrective Measure(s)	Date of Abatement	Measure(s) to Prevent Recurrence
9/18/19	Zinc above the daily maximum and Technical Review Criteria (TRC) limit				

(Attach additional pages if necessary)

Authorized Signatory for Industrial Discharger (Print)

Title

Signature

Date

Within 5-days of receipt, return this completed form to:

City of Broken Arrow,
Post Office Box 610
Broken Arrow, OK 74013
Attn: Utilities Department, Pretreatment Office

PHONE: (918) 259-7000 ext. 7220, FAX: (918) 259-7010, EMAIL: lkimbrough@brokenarrowok.gov
Email may be used to meet 5-day requirement. The original may be included with next monthly report.

SECTION 4:

SIGNIFICANTLY NON-COMPLIANT INDUSTRIAL USERS

SIGNIFICANTLY NONCOMPLIANT USERS
Enforcement Actions Taken

INDUSTRIAL USER (IU) NAME AND ADDRESS	NATURE of VIOLATION		NUMBER of ACTIONS TAKEN				PENALTIES COLLECTED	CURRENT STATUS (C, NC, SNC)	COMPLIANCE SCHEDULE	
			NOV	AO	Civil	Criminal			Date Issued	Completion Date
Flight Safety International 700 N. 9th St. Broken Arrow, OK 74012	X		1					SNC		

Additional Notes: Please see the explanation in Section 5



Friday, January 25, 2019

Michael Halsey
Director of Manufacturing and Materials Management
Flight Safety International
700 North 9th Street
Broken Arrow, OK 74012

Re: NOTICE OF VIOLATION AND SIGNIFICANT NON-COMPLIANCE

Dear Mr. Halsey,

This letter is in response to the notification sent by Flight Safety International on 1/18/19 informing the City of Broken Arrow Pretreatment Office that the 1st quarter laboratory analysis, for the months of October to December 2018, was not performed. The Broken Arrow Wastewater Discharge Permit No. BA 005, issued to Flight Safety International, requires laboratory analysis to be performed each quarter at monitoring locations 001 – Alodine (if wastewater will be discharged), 002 – Graphic Arts, and 003 – Water Jet. Parameters and frequencies for this laboratory analysis can be found on pages 7-9 of the permit.

The Oklahoma Pollutant Discharge Elimination System (OPDES) Permit No. 0040053, issued to City of Broken Arrow by the Department of Environmental Quality, requires the City to report Pretreatment Program activities from October 1 to September 30 each year and as such, Pretreatment Program quarters are as follows: 1st Quarter – October to December, 2nd Quarter – January to March, 3rd Quarter – April to June, 4th Quarter July to September. Compliance monitoring reports are due to the City of Broken Arrow Pretreatment Office by the 15th of the month directly following each quarter and should include: the complete laboratory analysis for each monitoring location, a compliance monitoring report signed by the permit authorized signatory, and quarterly waste hauling records for monitoring locations that were not discharged.

Failure to perform self-monitoring as required by the permit is a significant violation as defined in 40 CFR 403.8(f)(2)(viii) A-H. City of Broken Arrow is required to publish an annual list of all industrial users of the public sanitary sewer system who significantly violated a federal, state, or local pretreatment standard during the previous 12-month period. In order to satisfy this requirement, publications are made in the Tulsa World during the month of October. I have attached an example of the publication for you.

I am aware that there were unusual circumstances during the 1st quarter when the environmental laboratory contracted to perform wastewater analysis for Flight Safety neglected to provide that service. The City of Broken Arrow appreciates the level of participation that Flight Safety has had in the Pretreatment Program over the years and would like to extend a helping-hand as you transition new employees into positions that oversee your wastewater permit requirements so that violations can be avoided in the future. I am always available to assist you in training new employees on the permit requirements. I met with Mr. Alexander yesterday and believe that he has a very good understanding of what is required.

The next permit-required quarterly wastewater sample for Flight Safety International will need to be performed during the 2nd quarter between January and March 2019. The monitoring report for this laboratory analysis will be due to the City of Broken Arrow Pretreatment Office by April 15, 2019. Please do not hesitate to contact me if you have any questions, concerns or if I can assist you in permit compliance.



Sincerely,

Lauren Wilson

Lauren Wilson
Pretreatment Coordinator
City of Broken Arrow
485 N. Poplar Ave.
Broken Arrow, OK 74012
(918) 259-7000 Ext. 7220
lwilson@brokenarrowok.gov

cc: Charles Vokes, Utilities Director, City of Broken Arrow
Robn Werner, Director of Teammate Resources, Flight Safety International
Eric Alexander, Senior Safety Specialist, Flight Safety International

SECTION 5:

NEWSPAPER PUBLICATION OF SIGNIFICANTLY
NON-COMPLIANT INDUSTRIAL USERS

TULSA WORLD

P.O. Box 1770 Tulsa, Oklahoma 74102-1770 | tulsaworld.com

Account Number

1093799

CITY OF BROKEN ARROW
Attn: Lauren Kimbrough
485 NORTH POPLAR AVE.
BROKEN ARROW, OK 74012

Date

October 25, 2019

Date	Category	Description	Ad Size	Total Cost
10/25/2019	Legal Notices	LYNN LANE SANITARY SEWER	1 x 40.00 CL	25.60

Affidavit of Publication

604243
Published in the Tulsa
World, Tulsa County, Ok-
lahoma, October 25, 2019

PUBLIC NOTICE OF SIGNIFICANTLY VIOLATING INDUSTRIAL USERS

Broken Arrow Municipal
Authority/Lynn Lane Sani-
tary Sewer Service Area

Federal laws 40CFR, Part 25 and Part 403.8(f)(2) (viii) require that a municipality designated as a control authority publish an annual list all industrial users of the public sanitary sewer system who significantly violated any federal, state or local pre-treatment standard during the previous twelve (12) month period. Therefore, the City of Broken Arrow is required to publish the following list of industrial users who have been determined to be significant violators as defined by 40 CFR, Part 403.8(f)(2) (viii):

October 2018-
September 2019

Flight Safety International

I, Melissa Marshall, of lawful age, am a legal representative of the Tulsa World of Tulsa, Oklahoma, a daily newspaper of general circulation in Tulsa County, Oklahoma, a legal newspaper qualified to publish legal notices, as defined in 25 O.S. § 106 as amended, and thereafter, and complies with all other requirements of the laws of Oklahoma with reference to legal publication. That said notice, a true copy of which is attached hereto, was published in the regular edition of said newspaper during the period and time of publication and not in a supplement, on the DATE(S) LISTED BELOW

10/25/2019

Newspaper reference: 0000604243

M. Marshall
Legal Representative

Sworn to and subscribed before me this date: OCT 25 2019

Nancy Carol Moore
Notary Public



NANCY CAROL MOORE

Notary Public
State of Oklahoma

Commission # 06011684 Expires 12/08/22

My Commission expires DEC 08 2022

SECTION 6:

COMPLIANCE SCHEDULES

Blue Bell was on a compliance schedule for the October 1, 2018 to September 30, 2019 Pretreatment Year. All milestones have been met to date.

SECTION 7:

LYNN LANE WASTEWATER TREATMENT PLANT

WATER QUALITY BASED EFFLUENT
CONCENTRATIONS

