



SCOTT A. THOMPSON
Executive Director

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY

MARY FALLIN
Governor

July 5, 2018

CITY OF BROKEN ARROW

Kenneth Schwab, Assistant City Manager
City of Broken Arrow
P.O. Box 610
Broken Arrow, Oklahoma 74013-0610

JUL 09 2018

CITY MANAGER'S OFFICE

Re: FY 2018 City of Broken Arrow Pretreatment Compliance Inspection (PCI)
Facility No. S-20409
OPDES Permit No. OK0040053

Dear Mr. Schwab:

A Pretreatment Compliance Inspection (PCI) of the City of Broken Arrow Utilities Authority [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 April 11, 2018. 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 DEQ would like to commend the CA staff and personnel for operating a very organized and well-implemented Pretreatment Program with extensive Pollution Prevention (P2) activities and outreach that serves as a template for multiple Pretreatment Programs in the State. The CA is also to be commended for its involvement in State and Regional conferences through participation and presentations.

Questions or comments 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, Pretreatment Coordinator
Municipal Wastewater Enforcement Section
Water Quality Division

RS/BFC/MBM/md ST/CG

cc: Rudy Molina, Pretreatment Coordinator, US EPA Region 6 (w/enclosure)
Lauren Wilson, Pretreatment Coordinator, 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	4	0	0	5	3	11	12	1	8	0	4	1	1	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 0 9																													
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 City of Broken Arrow Industrial Pretreatment Program Lynn Lane WWTP Broken Arrow, Oklahoma		Entry Time [X] AM [] PM 9:35	Permit Effective Date October 1, 2017
		Exit Time/Date 10:45 AM / April 11, 2018	Permit Expiration Date September 30, 2022
Name(s) of On-Site Representative(s) Lauren Wilson		Title(s) Pretreatment Coordinator	
		Phone No(s) 918-455-4762	
Name, Address of Responsible Pretreatment Official Anthony Daniel City of Broken Arrow P.O. Box 610 Broken Arrow, OK 74013		Title Director of Utilities	
		Phone No. 918-259-8375	
		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)

*Mr. Daniel was unavailable at the time of the exit interview. Exit interview conducted with Kenneth Schwab, Assistant City Manager.

See attached report

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 7/5/18
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 Enforcement Group Manager	Date 7/5/18
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: City of Broken Arrow

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: 7/5/18

A. Approved Pretreatment Program (APP)

1. Pretreatment Program Approval Date: September 24, 1993

2. Program Modification Approval Date(s): 11/1/01 See comment Page 2

3. Date of Last Inspection: December 20, 2016

Type of Last Inspection: MPAA (Pretreatment Audit)

4. Annual Report:

[40 CFR 403.12(f)]

Due: October 31, 2017

Received: October 31, 2017

Periods Covered: From 10/1/16 to 9/30/17

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):

3

2. Number of Categorical Industrial Users (CIUs):

4

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>N/A</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
- 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

II. ONSITE INSPECTION To be completed by Municipal Enforcement EngineerName: Roshini SchroederSignature: Roshini SchroederDate: 7/5/18**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 **Blue Bell Creameries**
 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

I.A.4 The CA submits detailed Annual Reports (ARs) and supporting documents.

II.G.1. The CA issued Blue Bell Creameries (SIU) a consent order on January 23, 2017, for recurring non-compliance with 5-day biochemical oxygen demand (BOD₅) and total suspended solids (TSS) that required a waste characterization study and payment of a penalty of \$10,000. The SIU hired Gresham, Smith & Partners to perform the waste characterization study, submit an engineering report, and perform a pilot study of a portable DAF unit. The SIU met with the CA in October 2017 to report the pilot study results, after which the SIU was ordered to begin construction by January 8, 2018, and have the pretreatment system constructed by January 7, 2019.

II.H.2. The CA places a high value on Pollution Prevention (P2) and maintains records on all waste-diversion and fats, oils and grease (FOG) activities. The CA is also very active in educational outreach and events surrounding P2.