



SCOTT A. THOMPSON
Executive Director

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY

MARY FALLIN
Governor

July 5, 2018

Clayton Edwards, Water & Sewer Director
Regional Metropolitan Utility Authority
200 Civic Center, Room 403
Tulsa, Oklahoma 74103

Re: FY 2018 Pretreatment Compliance Inspection
Facility No. S-20434
OPDES Permit No. OK0034363

Dear Mr. Edwards:

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 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 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 broad scope invested in their pollution prevention (P2) activities.

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)
Kenneth Schwab, Assistant City Manager, 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 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 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 10:54	Permit Effective Date June 1, 2013
	Exit Time/Date 12:30 PM / April 11, 2018	Permit Expiration Date May 31, 2018
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)

* Mr. Kenneth Schwab, Assistant City Manager of Broken Arrow, attended the exit interview in place of Mr. Edwards, who was unavailable at the time.

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 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
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: 7/5/18

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: December 20, 2016

Type of Last Inspection: PCI

4. Annual Report:

[40 CFR 403.12(f)]

Due: October 31, 2017

Received: October 30, 2016

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):

4

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

- 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 Engineer

Name: Roshini Schroeder

Signature: Roshini Schroeder

Date: 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 Broken Arrow Powder Coating

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(l)]

☒ 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]
If yes, describe:

☒ YES ☐ NO

Additional Notes/Comments:

Question # Note or Comment

II.G The CIU was non-compliant for a zinc (Zn) sample collected on May 5, 2017, with a sample value of 5.73mg/l (permit daily max value = 2.61 mg/l; monthly max = 1.48 mg/l) in the CIUs self-monitoring report. The CIU notified the CA with a 24-hour notification form on May 23, 2017, soon after they discovered the exceedance. The CA issued a notice of violation (NOV) on May 22, 2017, with a response regarding compliance submitted on May 25, 2017.

II.H. The CA keeps excellent records, and performs extensive educational outreach activities.

II.H.2. 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 broad scope invested in their pollution prevention (P2) activities.