



SCOTT A. THOMPSON
Executive Director

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY

KEVIN STITT
Governor

March 15, 2019

Charles Vokes, Director of Utilities
City of Broken Arrow
P.O. Box 610
Broken Arrow, Oklahoma 74013-0610

Re: FY 2019 City of Broken Arrow Pretreatment Compliance Inspection (PCI)
Facility No. S-20409
OPDES Permit No. OK0040053

Dear Mr. Vokes:

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 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 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 participation 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



NPDES Compliance Inspection Report

Section A: National Data System Coding

[illegible]

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 9:45	Permit Effective Date October 1, 2017
		Exit Time/Date 11:00 AM / February 5, 2019	Permit Expiration Date September 30, 2022
Name(s) of On-Site Representative(s) Lauren Wilson		Title(s) Pretreatment Coordinator	
Name, Address of Responsible Pretreatment Official Charles Vokes 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)

See attached report

Name(s) and Signature(s) of Inspector(s) Roshini Schroeder 	Agency/Office/Telephone DEQ / Water Quality Division / 405-702-8132 Municipal Wastewater Enforcement Section	Date 3/15/19
Name and Signature of Reviewer Brian F. Clagg, P.E. 	Agency/Office/Telephone DEQ / Water Quality Division / 405-702-8118 Municipal Wastewater Enforcement Section	Date 3/15/19

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: **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: 3/15/19

A. Approved Pretreatment Program (APP)

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

2. Program Modification Approval Date(s): **11/1/01**

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

Type of Last Inspection: **PCI**

4. Annual Report:

[40 CFR 403.12(f)]

Due: **October 31, 2018**

Received: **October 31, 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): | <u>3</u> |
| 2. Number of Categorical Industrial Users (CIUs):
<small>List any new CIUs in Additional Notes/Comments</small> | <u>4</u> |
| 3. SIUs not inspected or sampled: | <u>0</u> |
| 4. SIUs without Control Mechanisms: | <u>0</u> |
| 5. SIUs in Significant Noncompliance (SNC) with standards or reporting:
<small>(reporting includes BMRs, 90-day, self-monitoring, compliance schedules, and non-compliance)</small> | <u>0</u> |
| 6. SIUs in SNC with self-monitoring requirements: | <u>0</u> |
| 7. SIUs in SNC with self-monitoring and not inspected or sampled: | <u>0</u> |

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 403.6(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

1.A.4. In the POTW Monitoring Results table contained within the Annual Report (AR), % MAHL was missing numeric numbers.

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

II. ONSITE INSPECTION To be completed by Municipal Enforcement EngineerName: Roshini SchroederSignature: Roshini SchroederDate: 3/15/19**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 **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]
 If yes, describe: ☒ YES ☐ NO

Additional Notes/Comments:

Question # Note or Comment

1.A.4. The Pretreatment Coordinator stated that the error in the %MAHL of the POTW Monitoring Results Table in the AR will be numerical in future AR submittals and will be checked for errors prior to submission.

II.G.1. The CA issued Blue Bell Creameries (SIU) a Consent Order on January 23, 2017, which is still in effect. Blue Bell has met all of the milestones to date. Surcharges have been suspended for the duration of the Order given that Blue Bell is upgrading their pretreatment system to meet current limits. The engineering status report issued by the contractors upgrading the plant stated that the pretreatment system would be online as of March 2019.

II.H.2. The CA has a robust and proactive pollution prevention (P2) program. The CA keeps metrics on FOG inspections and city-wide recycling, as well as participating in the 2018 Mayor's Challenge for Water Conservation during the month of April 2018. The CA is to be commended for its extensive P2 program and waste diversion activities.