



CITY OF
BROKEN ARROW

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Utilities Department
Post Office Box 610
Broken Arrow, Oklahoma 74013

To: Rick Hudson, Chairperson, Regional Metropolitan Utility Authority

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

Date: Tuesday, August 29, 2017

Subject: June to August 2017 RMUA Quarterly Pretreatment Report

Dear Mr. Hudson,

The following is a brief synopsis of the major activities of the Broken Arrow Industrial Pretreatment Program for June to August 2017. This update is in regards to pretreatment issues and industrial wastewater discharges pertaining to the R.M.U.A.'s Haikey Creek WWTP.

June 2017

Fats, Oil & Grease (FOG) Program:

1. City of Broken Arrow pretreatment staff inspected 61 food handling establishments (FHE) in the month of June. Staff inspected manifests for grease interceptor (GI) maintenance, looked at GI, and discussed best management practices. FHEs with improperly-maintained interceptors have been asked to perform maintenance immediately. Re-checks are done for non-compliance issues.
2. Claret Café installed influent and effluent tee-pipes on their grease interceptor as requested. Tee-pipes on the influent side provide a vent and slow flow to increase optimal holding time for grease laden wastewater. On the effluent side, the tee-pipe draws water from about 12 inches from the bottom of the interceptor. This ensures that solids accumulation on the bottom of the interceptor as well as grease that is floating on the top are not discharged into the City sewer system.
3. Mazzio's on Aspen installed influent and effluent tee-pipes on their grease interceptor as requested.
4. Kum & Go on 81st and Garnett installed influent and effluent tee-pipes on their grease interceptor as requested.
5. Broken Arrow pretreatment staff was asked to participate in a series of FOG seminars hosted by DEQ. The seminars are meant to assist smaller communities in developing procedures to control FOG discharges in their areas. The 3rd and final seminar was held on June 8 at the DEQ Office in Oklahoma City. Broken Arrow staff presented the steps that went into starting Broken Arrow's program such as; an initial survey, database development, paper file system, grease interceptor maintenance inspection form, best management practice development and SSO tracking procedures.

Industrial Pretreatment Activities:

1. The following reports/certifications were received and reviewed in the month of June:
 - CSI Aerospace compliance monitoring report and laboratory analysis. No deficiencies were noted.

**A new permit was issued to CSI Aerospace with an additional monitoring location. CSI will now be collecting metal finishing rinse water samples from 2 locations every quarter.*

- Seneca Environmental/Kum & Go #879 at 81st & Garnett – Frac tank discharge report was received and reviewed. The frac tank consisted of ground water accumulation around the underground fuel storage tanks. Underground storage tank ground water is analyzed for benzene, toluene, ethylbenzene, xylenes, total petroleum hydrocarbons-gasoline range organics/diesel range organics, oil & grease, and flashpoint. No deficiencies were noted. Discharge was approved.
- Seneca Environmental/Murphy's 71st & Aspen – Frac tank discharge report was received and reviewed. The details of the frac tank are the same as stated above. No deficiencies were noted. Discharge was approved.
- Unifirst compliance monitoring report and laboratory analysis. No deficiencies were noted.

**Surcharges for bio-chemical oxygen demand (BOD), total suspended solids (TSS), and oil & grease above residential thresholds were issued to Unifirst as a result of laboratory analysis in the amount of \$3,640.91.*

2. City pretreatment staff inspected 14 industrial sewer users in the month of June as a part of the 5-year, comprehensive survey that is required by DEQ. The purpose of the survey is to determine compliance with the sewer use/pretreatment requirements that are outlined in Chapter 24, Article V of the Broken Arrow Municipal Code. Staff is looking at industrial processes that have waste streams to determine if a permit is necessary, and focusing on chemical storage as well as hazardous/waste disposal manifests. The information gathered will go into the industrial user database.

July 2017

Fats, Oil & Grease (FOG) Program:

1. City of Broken Arrow pretreatment staff inspected 10 food handling establishments (FHE) in the month of July. Staff inspected manifests for grease interceptor (GI) maintenance, looked at GI, and discussed best management practices. FHEs with improperly-maintained interceptors have been asked to perform maintenance immediately. Re-checks are done for non-compliance issues.
2. The City of Broken Arrow Communications Department added two videos to the Facebook, Youtube, and City of Broken Arrow webpages in July. The topics of the videos are "Proper Disposal of Fats, Oil and Grease" and "Flushable Wipes Are Not Flushable".

Industrial Pretreatment Activities:

1. The following compliance monitoring reports/certifications were received and reviewed in the month of July:
 - Unifirst compliance monitoring report and laboratory analysis. No deficiencies were noted.
**Surcharges for Bio-chemical Oxygen Demand (BOD), Total Suspended Solids (TSS), and Oil & Grease above residential thresholds were issued to Unifirst as a result of laboratory analysis in the amount of \$1,116.12.*
 - CSI Aerospace yearly control authority analytical results for sample locations 001 and 002 were received and reviewed. No deficiencies were noted.
 - CSI Aerospace quarterly self-monitoring report and laboratory analysis were received and reviewed. No deficiencies were noted.
 - Quik Trip/GHD laboratory analysis for underground storage tank ground water was received and reviewed. No deficiencies were noted, and discharge was permitted into the City of Broken Arrow sanitary sewer system.
 - Seneca Environmental submitted laboratory analysis for Kum & Go 81st & Garnett. The report was for ground water pumped from around the underground storage tank. The analysis was reviewed with no deficiencies noted and discharge was approved.
2. The Pretreatment Coordinator attended the Annual EPA Region VI Pretreatment Association Workshop in Albuquerque, NM in July. The workshop covered topics such as: Pretreatment Legal Authority, Enforcement, Audits, Categorical Pretreatment Standards and How to Apply Them, Federal Pretreatment Updates (Dental Amalgam Rule), Perspectives on Urbanization and Contaminants of Emerging Concern,

Metal Finishing Category Updates, Grease Trap University, and Pharmaceuticals in Water. This workshop gives city pretreatment officials from EPA's Region VI an opportunity to network with each other as well as regulatory officials from their state and the federal government.

3. Pretreatment staff mailed Dental Office surveys in the last week of July. The purpose of the survey is to find out which Dental facilities in Broken Arrow are subject to the new regulations that were signed by EPA and entered in the Federal Register in June of this year.
4. Pretreatment staff performed the yearly process wastewater site inspection for Broken Arrow Powder Coating Location 2. The existing wastewater discharge permit for this site expires on December 31, 2017. Broken Arrow Powder Coating has been asked to review and revise the Toxic Organic Management Plan as well as the Accidental Spill Prevention Plan and submit both documents with the wastewater discharge permit application that is due on November 30, 2017.
5. City pretreatment staff inspected 13 industrial sewer users in the month of July. Staff is looking at industrial processes that have waste streams to determine if a permit is necessary, and focusing on chemical storage as well as hazardous/waste disposal manifests.
6. City pretreatment staff inspected 61 auto shops in the month of July. Oil/water separators are inspected for proper maintenance and waste hauling manifests are checked to ensure proper waste disposal.

August 2017:

Fats, Oil & Grease (FOG) Program:

1. City pretreatment staff inspected 19 food handling establishments (FHEs) in the month of August. Staff inspected manifests for grease interceptor (GI) maintenance, looked at GI, and discussed best management practices. FHEs with improperly-maintained interceptors have been asked to perform maintenance immediately. Re-checks are done for non-compliance issues.
2. Staff inspected cooking oil recycling bins at 62 FHEs in August. Our database did not have recycling details listed for these facilities. Of the 62 facilities, 32 are recycling cooking oil which makes the grand total 145 cooking oil recyclers in Broken Arrow. Many of the facilities that do not recycle are adult care facilities, schools, sandwich shops, coffee shops, donut shops and ice cream parlors. We will be encouraging adult care facilities and donut shops to recycle in the months to come. Schools are no longer frying foods as a part of their student health programs.

Industrial Pretreatment Activities:

1. The following compliance monitoring reports/certifications were received and reviewed in the month of August:
 - Broken Arrow Powder Coating quarterly self-monitoring report and laboratory analysis. No deficiencies were noted.
 - Broken Arrow Powder Coating Location 2 yearly control authority analytical results were received and reviewed. No deficiencies were noted.
 - Unifirst compliance monitoring report and laboratory analysis. No deficiencies were noted.
**Surcharges for Bio-chemical Oxygen Demand (BOD), Total Suspended Solids (TSS), and Oil & Grease above residential thresholds were issued to Unifirst as a result of laboratory analysis in the amount of \$2,904.26.*

2. City pretreatment staff inspected 9 automotive shops in the month of August. Oil/water separators are inspected for proper maintenance and waste hauling manifests are checked to ensure proper waste disposal.

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 signature is fluid and cursive, with the first name "Lauren" being larger and more prominent than the last name "Wilson".

Lauren Wilson
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