



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: 11/23/16

Subject: September through November 2016 RMUA Quarterly Pretreatment Report

Dear Mr. Hudson,

All Broken Arrow significant industrial users (SIU) in the Haikey Creek Wastewater Treatment Plant basin are currently in compliance with City of Broken Arrow pretreatment regulations as listed in the Broken Arrow discharge permits and municipal code.

The following is a brief synopsis of the major activities of the Broken Arrow Industrial Pretreatment Program for, September to November 2016. This update is in regards to pretreatment issues and industrial wastewater discharges pertaining to the R.M.U.A.'s Haikey Creek WWTP.

September 2016

Fats, Oil & Grease (FOG) Program:

1. City of Broken Arrow pretreatment staff inspected 32 food handling establishments (FHE) in the month of September. 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. Broken Arrow developed a new FHE best management practice (BMP). The new document is a laminated sign that FHEs are asked to display in an area where employees can view it.
3. Broken Arrow utilities staff met with Forest Hills adult care facility management (again) about the GI maintenance schedule. The manhole directly downstream from this facility has experienced multiple grease-related sanitary sewer overflows and they have been asked several times to increase their GI pumping schedule. This time, city staff met with administration instead of just maintenance staff. Forest Hills administration has agreed to increase the pumping schedule to quarterly on the large GI (previously done semi-annually) and monthly on the small GI (previously done quarterly). Forest Hills administration was cooperative and ready to do what it takes to keep excessive grease from accumulating in the sewer lines. Broken Arrow will be monitoring their progress.

Industrial Pretreatment Activities:

1. City of Broken Arrow wastewater discharge permits require the permit holder to perform scheduled (either semi-annual, quarterly or monthly) self-monitoring for specific contaminants and report the analytical results to the City by the 15th of the following month. The following reports/certifications were received and reviewed in the month of September:

- CSI Aerospace compliance monitoring report and laboratory analysis. 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 September laboratory analysis in the amount of \$4,701.65.*

2. Auto shop inspections are now taking place in Broken Arrow. Staff is distributing BMP signs to auto shop managers and asking that they display them in a place where their employees can easily view. Staff is looking at manifests for hazardous/waste disposal and entering the information into the database.

October 2016

Fats, Oil & Grease (FOG) Program:

1. Broken Arrow pretreatment staff inspected 58 food handling establishments (FHE) in the month of October. Staff focused on FHEs listed, at their last inspection, as having: full interceptors; dirty oil recycle-station areas; no maintenance manifests on-site and insufficient GI maintenance schedules.
2. Broken Arrow pretreatment staff are working to inform Broken Arrow residents about pollution prevention practices that can be put in place at their homes to decrease chances of sewer back-ups and help keep fats, oil & grease out of the City sewer system. Staff continues to distribute cooking oil collection bottles and recycling information to residents in neighborhoods that have grease-related sanitary sewer overflows. These materials are also available at the Broken Arrow One Stop Center.

Industrial Pretreatment Activities:

1. City of Broken Arrow wastewater discharge permits require the permit holder to perform scheduled (either semi-annual, quarterly or monthly) self-monitoring for specific contaminants and report the analytical results to the City by the 15th of the following month. The following reports/certifications were received and reviewed in the month of October:

- Unifirst compliance monitoring report and laboratory analysis.

**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 October laboratory analysis in the amount of \$4,268.45.*

2. Upon invitation by Mr. Hudson, pretreatment staff went to RL Hudson Co. for an industrial user survey update. RL Hudson Co. does not need a wastewater discharge permit, per 40 CFR 403. All hazardous/waste materials are being hauled offsite and manifests are being kept.
3. The FY 2016 annual pretreatment report for Haikey Creek Wastewater Treatment Plant was submitted to DEQ. The report is attached for your review. The report consists of:
 - 1) Comparing quarterly priority pollutant laboratory analyses to Oklahoma water quality standards and maximum allowable headworks loadings (MAHL) based upon influent daily flow.

- 2) Calculating significant non-compliance for 12 months for industrial users (IU) based upon technical review criteria, violations, etc. This requires a complete file review for each permitted IU.
 - 3) Summarizing IU self-monitoring and reporting for the 12-month period of October 1, 2015 to September 30, 2016.
 - 4) Summarizing IU inspections and City-performed monitoring for the year.
 - 5) Summarizing pollution prevention activities for the year.
 - 6) Summarizing IU survey activities for the year.
4. Broken Arrow staff developed a "Car Wash Questionnaire" to determine maintenance practices and procedures for oil/water separators and sand traps.

November 2016:

Fats, Oil & Grease (FOG) Program:

1. City pretreatment staff inspected 30 food handling establishments (FHEs) from November 1 to November 27, 2016. Staff focused on FHEs listed, at their last inspection, as having: full interceptors; dirty oil recycle-station areas; no maintenance manifests on-site and insufficient GI maintenance schedules.
2. The Utilities Department sent out a community alert to all Broken Arrow residents, via the emergency callout system, asking them to recycle used cooking oil this holiday season.

Industrial Pretreatment Activities:

1. City of Broken Arrow wastewater discharge permits require the permit holder to perform scheduled (either semi-annual, quarterly or monthly) self-monitoring for specific contaminants and report the analytical results to the City by the 15th of the following month. The following reports/certifications were received and reviewed in the month of November:
 - Unifirst compliance monitoring report and laboratory analysis. No deficiencies were noted.
 - Broken Arrow Powder Coating compliance monitoring report and laboratory analysis. No deficiencies were noted.

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 Lynn Lane WWTP office.

Sincerely,



Lauren Wilson
Pretreatment Coordinator
City of Broken Arrow
Phone: 918.455.4762 Fax 918.455.4172
Email: lwilson@brokenarrowok.gov