

Regional Metropolitan Utility Authority
Haikey Creek Wastewater Treatment Plant
Industrial Pretreatment Program
OPDES Permit # OK0034363

Annual Report to the Oklahoma Department of
Environmental Quality
October 1, 2016 to September 30, 2017

**RMUA
INDUSTRIAL PRETREATMENT PROGRAM
ANNUAL REPORT**

CERTIFICATION STATEMENT

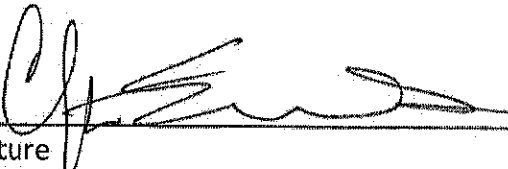
"I hereby certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Regional Metropolitan Utility Authority
Control Authority

Oct. 1, 2016 to Sep. 30, 2017
Report Date

Clayton Edwards
Name of Responsible Official (Tulsa)

Director of Water and Sewer Dept.
Title


Signature

**RMUA
INDUSTRIAL PRETREATMENT PROGRAM
ANNUAL REPORT**

CERTIFICATION STATEMENT

"I hereby certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Regional Metropolitan Utility Authority
Control Authority

Oct. 1, 2016 to Sep. 30, 2017
Report Date

Anthony Daniel, City of Broken Arrow
Name of Responsible Official

Director of Utilities
Title

Anthony Daniel
Signature
10-24-17



Tuesday, October 24, 2017

Roshini Nambiar, Municipal Pretreatment Coordinator
Oklahoma Department of Environmental Quality
Municipal Wastewater Enforcement Section
Water Quality Division
PO Box 1677
Oklahoma City, OK 73101-1677

Re: FY 2017 Pretreatment Annual Report to DEQ
RMUA/Haikey Creek WWTP
OPDES Permit Number OK0034363

Dear Ms. Nambiar:

The RMUA/Haikey Creek WWTP Industrial Pretreatment Program Annual Report for the period October 1, 2016 through September 30, 2017 is hereby submitted. Please note the following general comments in addition to the required forms:

Report of Changes to the Approved Pretreatment Program

There have been no changes made or requested to the RMUA/Haikey Creek WWTP approved Industrial Pretreatment Program.

Industrial User Wastewater Survey

The IU Wastewater Survey is continually updated in Tulsa and Broken Arrow. In Tulsa, the Industrial Waste Survey database is updated monthly by Pretreatment staff reviewing the monthly report of new commercial and industrial utility account customers and conducting inspections of those facilities. No new permits were added to the City of Tulsa Industrial Pretreatment Program during FY 2017. All records pertaining to City of Tulsa's survey are kept at the Tulsa Pretreatment office. Please let me know if you would like to look at the files and I can arrange to have them present at the next Pretreatment Compliance Inspection.

In Broken Arrow, all new non-residential utility customers are given a one-page short survey to fill out before they can obtain water service. The surveys are then forwarded to the pretreatment office. A comprehensive IU Survey is performed every 5 years and was initiated in late 2016. Facilities are inspected for compliance with City of Broken Arrow Municipal Code Chapter 24, Article V, Requirements for Discharge to the Sanitary Sewer System (Industrial Pretreatment Program).

Survey inspections focused on process wastewater streams; sand interceptor and oil/water separator maintenance records; chemical storage areas; and waste manifests. Inspections were performed at automotive shops, car washes, machine shops, and manufacturing facilities. Surveys were mailed to dental offices as well as all other industrial operations in Broken Arrow. No new permits were added to the City of Broken Arrow Industrial Pretreatment Program as a result of the survey during this pretreatment year. All records pertaining to the IU survey are kept at the pretreatment office for your review.



Report on Pass Through, Upset and/or Interference

Regarding Influent and Effluent priority pollutant scans, all parameters were below both maximum allowable headworks loadings (MAHL) and Oklahoma Water Quality Criteria.

There have been no instances of pass through, upset or interference resulting in OPDES permit violations known or suspected to have been caused by industrial users at any of the POTW covered under the RMUA/Haikey Creek WWTP Industrial Pretreatment Program.

Report on Other Administrative Activities

During the October 2016 to September 2017 Pretreatment year no industrial users were published as significantly non-compliant (SNC).

Southwest Regional Medical Center was issued two notices of violation (NOV) for incomplete compliance monitoring reports during FY 2017. The first NOV was verbal, per the City of Tulsa enforcement response plan, and the second was a written notice with a \$50 fine. Please see the documentation in Section 3.

Broken Arrow Powder Coating (Location 2) was issued an NOV for a zinc result of 5.73 mg/L, which is 1.19 times over the daily limit of 2.61 mg/L. The City of Broken Arrow enforcement response plan calls for a notice of violation, which was issued on May 22nd. Broken Arrow Powder Coating was asked to analyze the process waste stream for zinc for three additional days in May. There was no monthly average violation and Broken Arrow Powder Coating was asked to resume their normal sampling schedule. The documentation is attached in Section 3, for your review.

During FY 2017, Unifirst was issued surcharges in the amount of \$50,371.88 for biochemical oxygen demand (BOD), total suspended solids (TSS), and oil & grease results above residential thresholds per Broken Arrow Municipal Code Manual of Fees. Documentation on monthly surcharge amounts is attached for your review in Section 3.

The charges are as follows:

BOD above 250 mg/L = \$0.50/pound

TSS above 250 mg/L = \$0.16/pound

Oil & grease above 100 mg/L = \$0.16/pound

Pollution Prevention

Both City of Tulsa and City of Broken Arrow place a high value on pollution prevention. Please read the following list of activities for FY 2017:

City of Tulsa:

Pharmaceutical/Medication Disposal

To protect our source water from improper disposal of medications we organize medication take back events and promote the use of permanent drop off locations. Working with other area groups, we held two events. We collected 1778 pounds of medications total.

We continue to work with the City of Tulsa Stormwater, COOTs, the Metropolitan Environmental Trust (the MET), Tulsa County Medical Society, Tulsa County Social Services, and CAPSAT to promote the 4 permanent medication drop-off boxes, maintained by the Oklahoma Board of Narcotics and Dangerous Drugs.



Dental Mercury Amalgam

The P2 group continues to promote the application of the Best Management Practices (BMP) for Amalgam Waste developed by the American Dental Association. These BMPs, as well as the use of amalgam separators, are encouraged during dental facility inspections, which are conducted pursuant to the P2 group's Silver BMP program. As of July 14, 2017, the new Dental Amalgam Regulation was handed down. We will be sending letters to all the dentists in Tulsa detailing this regulation and the requirements that each office will have to meet. In the past year, staff surveyed/visited with 15 dental facilities about their amalgam use and educated them about proper amalgam disposal.

Best Management Practice Programs

A majority of our work continues to be in the maintenance and further development of our BMP programs; which, are designed to reach large industry groups using a cost-effective, low burden, proactive approach beneficial for both the regulator and business. The following is a summary of current programs:

1. X-ray & Photo Processors – 360 total participants; 168- Digital Lifetime PACE participants
2. Radiator Repair Shops - 0 participants
3. Printers - 6 participants
4. Individual, industry written - 13 participants
5. Food Handling Facilities - 392 participants
6. Mobile Food Vendor- 139 participants
7. Equipment/Vehicle Washing- 1 participant

Silver BMP Program

Most facilities continue to switch from a wet process to digital, we have spent less time visiting digital facilities as they are "Lifetime" PACE members do not require a BMP any more. We still want to recognize those who implemented P2 process substitution with the Lifetime membership. We are continually updating our database to keep up with changing addresses, retirees, new offices, and closings. During the reporting year, P2 personnel made 23 surveys/office visits to silver facilities, and 93 other contacts such as faxes, phone calls, mailings, and emails for the purpose of promoting and encouraging BMP participation and renewal.

Radiator Repair BMP Program

1 BMP surveys were conducted this year. There is one shop that is open, but planning to close or sell. He did not want to renew in the BMP program. All of other radiator shops in Tulsa have either went out of business, no longer work on metal radiators. We've scheduled a visit every 6-months to the shop that is planning to close or sell to make sure BMPs are followed during disposal and/or educate the new owner about the BMPs.

Printer BMP Program

No surveys were conducted at printing facilities this year. There was a total of 8 emails/phone calls to printing facilities.

FOG BMP Program

The Fats, Oils, and Grease BMP program is the area that still demands most of our attention. The program continues to disseminate out BMP information to the food-handling industry with positive results. We increased communication and outreach with food handling establishments (FHEs). Staff performed 1449 BMP surveys, and over 641 other contacts, such as follow ups, office visits,



investigations, faxes, phone calls, mailings, and emails. Currently, 21% of the City's 2524 FHEs are participating in the BMP program.

In 2016-2017, we took the following enforcement action on food handling facilities: 6 Notices of Violations and 4 Administrative Orders; and assessed \$450 in fines and \$628 in cost recovery.

We conducted 1 FOG workshop. We gave FOG BMP training onsite at 3 food handling establishments. During the reporting year, 174 individuals attended FOG BMP training.

Mobile Food Vendor BMP Program

All mobile food vendors receive BMP information when applying/renewing for their City of Tulsa business license. Any vendors that discharge wastewater within the City have to have a wastewater disposal plan approved in order to receive their business license. We approved/renewed 69 MFV's plans. The vendors are inspected along with other food handling establishments included in the FOG program.

Advertising/Outreach

This was the sixth year the P2 program received an advertising budget of approximately \$39,000, which is used to continue the "Trap the Grease" campaign promoting FOG issues to residents. The reporting year's projects include:

- Ran previous year's billboard and bus shelter ads
- Running TV and radio ads on local stations
- An after-Thanksgiving fryer oil collection event
- Outreach booths at local grocery stores
- Distributing Fat Trappers, can toppers, brochures and flyers

Other public education events include: FOG information at all Stormwater Quality public education events, 2 Earth Day events, Home and Garden Show, presentations at a Met committee meeting, booth at Guthrie Green for the National Community Planning Month and a FOG display at 2 Reasor's grocery store locations.

PACE

The City of Tulsa's Partners for a Clean Environment (PACE) program is still the main incentive for P2 participation. All BMP participants receive website recognition and a pledge and decal for display.

As a whole, the City of Tulsa's P2 activities continue to thrive. The vast P2 database and overall network is growing and we are becoming even more effective in our efforts. Our database is being streamlined as updated information becomes available. Present members in our BMP programs are continuing to participate, and new members are being added as more contacts are made. We are in the process of implementing the new Dental Amalgam Regulation, and soon will be using the Lucity software to track FOG producing businesses as well as grease related SSOs.

City of Broken Arrow:

- Broken Arrow MET Recycle Center yearly totals: Antifreeze recycled = 850 gal; Cooking oil recycled = 254 gal; Motor oil recycled = 8,375 gal
- City of Broken Arrow cooking oil recycle station (located @ Reasor's) yearly total = 370 gal
- City of Broken Arrow has an inspector that conducts food handling establishment inspections 3 days per week. His goal is to make it to all Broken Arrow establishments twice per year. He checks the grease interceptor for proper maintenance, looks at maintenance



manifests, speaks with management about best management practices, and inspects cooking oil recycle areas.

- City of Broken Arrow pretreatment staff made a presentation at the annual Homeowner's Association Workshop about fats, oil & grease (FOG) Pollution Prevention and the importance of recycling used cooking oil.
- City of Broken Arrow offers free cooking oil collection bottles and recycling instructions to residents at City Hall.
- City staff also participated in a FOG pollution prevention workshop with the DEQ pollution prevention team as well as several other larger Oklahoma pretreatment cities. The workshop provided information on start-up and maintenance of a productive FOG program, it was created for smaller, non-pretreatment cities in Oklahoma.

This concludes the report summary; the report is to follow. If you have any questions, please contact me at (918) 259-7000 ext. 7220 or lwilson@brokenarrowok.gov.

Sincerely,

Lauren Wilson

Lauren Wilson
Pretreatment Coordinator
City of Broken Arrow/RMUA
(918) 259-7000 Ext. 7220
485 N. Poplar Avenue
Broken Arrow, OK 74012

cc: Mayor Craig Thurmond, RMUA Chairman c/o Sherry Gaston, RMUA Administrator
Michael Spurgeon, City Manager, City of Broken Arrow
Kenny Schwab, Assistant City Manager of Operations, City of Broken Arrow
Anthony Daniel, Director of Utilities, City of Broken Arrow
Clayton Edwards, Water and Sewer Department Director, City of Tulsa
Cindy Cantero, Pretreatment Manager, City of Tulsa

SECTION 1

PRETREATMENT PERFORMANCE SUMMARY

PRETREATMENT PERFORMANCE SUMMARY (PPS)

Page 1 of 2

I. General Information

Regional Metropolitan Utility Authority

Control Authority Name

Attention Sherry Gaston: 175 E. 2nd Street, Suite 08-217, Tulsa, OK 74013

Mailing Address 1

Attention Lauren Wilson: P.O. Box 610, Broken Arrow, OK 74013

Mailing Address 2

Lauren Wilson, Pretreatment Coordinator

Contact Person, Position

(918) 259-7000 ext. 7220

(Area Code) Contact Telephone

OK0034363

OPDES Permit Number(s)

Begin Date: 10/1/2016

End Date: 9/30/2017

Reporting Period

II. Significant Industrial User Compliance

<u>Record the Number of SIU Who:</u>		<u>SIGNIFICANT INDUSTRIAL USERS</u>	
		<u>Categorical</u>	<u>Non-categorical</u>
I.	a. Submitted a BMR	<u>N/A</u>	<u>N/A</u>
	b. Were Required to Submit a BMR	<u>N/A</u>	<u>N/A</u>
2.	a. Submitted a 90-Day Compliance Report	<u>N/A</u>	<u>N/A</u>
	b. Were Required to Submit a 90-Day Report	<u>N/A</u>	<u>N/A</u>
3.	a. Submitted Required Self-monitoring Reports	<u>2</u>	<u>4</u>
	b. Were Required to Submit Self-monitoring Reports	<u>2</u>	<u>4</u>
4.	a. Met a Compliance Schedule	<u>0</u>	<u>0</u>
	b. Were Required to Meet a Compliance Schedule	<u>0</u>	<u>0</u>
5.	a. Were in Significant Noncompliance (SNC)	<u>0</u>	<u>0</u>
<u>Additional Information:</u>			
6.	Total Number of SIU	<u>2</u>	<u>4</u>
7.	Rate of SNC for <u>all</u> SIU (categorical & non-categorical)	<u>0</u> %	

PRETREATMENT PERFORMANCE SUMMARY (PPS)

Page 2 of 2

III. Compliance Monitoring Program

<u>Record the Number of:</u>		<u>SIGNIFICANT INDUSTRIAL USERS</u>	
		<u>Categorical</u>	<u>Non-categorical</u>
I.	a. Issued Control Documents	<u>1</u>	<u>1</u>
	b. Required Control Documents	<u>1</u>	<u>1</u>
2.	a. Facilities Inspected	<u>2</u>	<u>4</u>
	b. Inspections Conducted	<u>2</u>	<u>7</u>
3.	a. Facilities Sampled	<u>2</u>	<u>4</u>
	b. Samplings Conducted	<u>12</u>	<u>71</u>

IV. Enforcement Actions

<u>Record the Number of:</u>		<u>SIGNIFICANT INDUSTRIAL USERS</u>	
		<u>Categorical</u>	<u>Non-categorical</u>
1.	a. Compliance Schedules Issued	<u>0</u>	<u>0</u>
	b. Compliance Schedules Required	<u>0</u>	<u>0</u>
2.	Notices of Violation (NOV) Issued	<u>2</u>	<u>2</u>
3.	Administrative Orders (AO) Issued	<u>0</u>	<u>0</u>
4.	Civil Suits Filed	<u>0</u>	<u>0</u>
5.	Criminal Suits Filed	<u>0</u>	<u>0</u>
6.	Significant Violators Published	<u>0</u>	<u>0</u>
7.	SIU that were Assessed Penalties	<u>0</u>	<u>2</u>
8.	Dollars of Penalties Collected	<u>\$0</u>	<u>\$50,421.88</u>
9.	Other Actions (sewer bans, etc.)	<u>0</u>	<u>0</u>

SECTION 2

SIGNIFICANT INDUSTRIAL USERS PRETREATMENT PROGRAM STATUS REPORT

PRETREATMENT PROGRAM STATUS REPORT
Updated Significant Industrial User List

SIGNIFICANT INDUSTRIAL USER (SIC) NAME AND ADDRESS	SIC CODE	CATEGORICAL NON-CATEGORICAL	CONTROL DOCUMENT		ADDED/ DELETED (A, D, N/A)	NUMBER OF TIMES SAMPLED		NUMBER OF TIMES INSPECTED	COMPLIANCE STATUS (C, NC, SNG, N/A)			EFFLUENT LIMITS
			Y/N	Last Action		GLY	SIU		REPORTS			
									BMR	90-Day Compliance	Self- Monitoring	
Hillcrest Hospital South 8801 South 101 st East Ave. TUL	8062	Non Categorical	Yes	06/03/15	N/A	4	4	2	N/A	N/A	C	C
Saint Francis Hospital South 6161 South Yale Ave. TUL	8062	Non Categorical	Yes	11/07/14	N/A	5	2	2	N/A	N/A	C	C
Southwest Regional Medical Center 10109 East 79 th St. TUL	8062	Non Categorical	Yes	09/04/15	N/A	5	2	2	N/A	N/A	NC	C
Broken Arrow Powder Coating (location 2) 2051 W. SW. Expressway Dr. BA	3479	Categorical	Yes	01/01/15	N/A	1	6	1	N/A	N/A	C	NC
CSI Aerospace 2020 W. Detroit BA	3479	Categorical	Yes	05/01/17	N/A	1	4	1	N/A	N/A	C	C
Unifirst Corporation 2100 N. Beech BA	7218	Non Categorical	Yes	10/13/17	N/A	1	48	1	N/A	N/A	C	C

SECTION 3

NON-COMPLIANT INDUSTRIAL USERS

[illegible]

Additional Notes:

Reviewed By

MAY 18 2017

Ln



RECEIVED
5-18-17

CITY OF BROKEN ARROW

INDUSTRIAL PRETREATMENT PROGRAM

24-HOUR NOTIFICATION FOR WASTEWATER
DISCHARGE PERMIT EXCURSIONS

FACSIMILE OR EMAIL TRANSMITTAL SHEET

TO:
Industrial Pretreatment Coordinator

FROM: *Shane Vaughn*

COMPANY:
City of Broken Arrow/Industrial Pretreatment Program

DATE: *5/18/17*

FAX: (918) 251-3383

TOTAL NO. OF PAGES INCLUDING COVER: *1*

PHONE NUMBER:
(918) 259-7000 ext. 7220

SENDER'S PERMIT NUMBER:

EMAIL:
lwilson@brokenarrowok.gov

RE: *svaughn@bapowdercoating.com*

☒ URGENT

☐ FOR REVIEW

☐ PLEASE COMMENT

☐ PLEASE REPLY

☐ PLEASE RECYCLE

NOTES/COMMENTS:

Description of event: *tested over limit for Zinc*

Duration of event:

Date/Time of event: *5/5/2017*

Impact on compliance:

Suspected Cause: *Possible result of product being processed
at the time. Possible false reading?*

Prevention: *Retest; Proceed after results*



Monday, May 22, 2017

Shane Vaughn
President
Broken Arrow Powder Coating
2051 SW Expressway Dr.
Broken Arrow, OK 74012

Re: NOTICE OF VIOLATION OF CITY OF BROKEN ARROW WASTEWATER DISCHARGE PERMIT # BA 015(2)

Dear Mr. Vaughn,

Enclosed is a notice of violation (NOV) of Wastewater Discharge Permit # BA 015(2) for the Broken Arrow Powder Coating facility located at 2051 SW Expressway Drive. The quarterly compliance monitoring report that was submitted to the Broken Arrow Pretreatment Office revealed a zinc result of 5.73 mg/L for the sample taken on May 5, 2017. That is 1.19 times over the daily limit of 2.61 mg/L. You fulfilled the requirement of notifying the City within 24 hours by submitting written notification on Thursday, May 18, 2017. I have attached a form for your response to the violation. Please sign the enclosed forms, describe the suspected cause of the violation and any abatement efforts, and return to the City of Broken Arrow Pretreatment Office within five days. Federal, State, and Local law require a retest for zinc within 30 days. You should also prepare a monitoring report for the retest. Should you have any questions or concerns regarding this correspondence, do not hesitate to contact me at (918) 259-7000 ext. 7220.

Sincerely,

Lauren Wilson
Pretreatment Coordinator
City of Broken Arrow
P.O. Box 610
Broken Arrow, OK 74013
(918) 259-7000 ext. 7220 FAX: (918) 251-3383
lwilson@brokenarrowok.gov

cc: Anthony Daniel, Director of Utilities, City of Broken Arrow



BROKEN ARROW

Utilities Department Industrial Pretreatment Program

Notice of Violation

In accordance with § 24-506 of the Broken Arrow Code of Ordinances this instrument serves as a written notice of violation of the industrial wastewater discharge permit and/or requirements of federal, State or local regulations pertaining to wastewater discharge.

Discharger: Broken Arrow Powder Coating Location 2

Address of Discharge: 2051 SW Expressway Dr., Broken Arrow, OK 74012

Permit#: BA 015 (2) Date Notice Issued: 5/22/17

Control Authority Issuing Representative: THE CITY OF BROKEN ARROW

Date Violation occurred	In violation of	Nature of violation	Fine
5/5/17	Wastewater Discharge Permit # BA 015 (2)	Zinc reported at 5.73 mg/L, which is over the daily limit of 2.61 mg/L	None, no violations in previous 6-month period. 1.19 times over the limit, does not require a fine per City of Broken Arrow Pretreatment Enforcement Response Plan. Notice of Violation required.

IMPORTANT: VIOLATION(S) MUST CEASE AND DESIST BY: IMMEDIATELY

Receipt of Notice Acknowledged by Discharger:

<u>Shane Vaughn</u>		<u>Vice President</u>
*Authorized Signatory for Industrial Discharger (Print)		Title
<u>5/23/17</u>	<u>Shane Vaughn</u>	
Date	Signature	
<u>Anthony Daniel</u>		<u>5-22-17</u>
Anthony Daniel, Director of Utilities		Date

Within 5 days of the date of this notice, return the signed form with a written response identifying the suspected cause of the violation(s), the corrective measures taken to abate the violation(s), the date(s) of abatement, and measures to prevent recurrence to:

City of Broken Arrow
P.O. Box 610
Broken Arrow, OK 74013
Attn: Industrial Pretreatment Coordinator

(phone) 918-259-7000 ext. 7220, (fax) 918-251-3383, (email) lwilson@brokenarrowok.gov. Fax or email may be used to meet the 5-day requirement. Original may be included with next monthly report.



BROKEN ARROW

Industrial User Response to Violation

Discharger: Broken Arrow Powder Coating, Location 2

Address of Discharger: 2051 SW Expressway Dr., Broken Arrow, OK 74012

Permit#: BA 015(2)

Date Occurred	Nature of Violation	Suspected Cause	Corrective Measure(s)	Date of Abatement	Measure(s) to Prevent Recurrence
5/5/17	Zinc above daily limit.				

(Attach additional pages if necessary)

Shane Vaughn
Authorized Signatory for Industrial Discharger (Print)

V.P.

Title

Shane Vaughn
Signature

5/23/17

Date

Following 24-hour notice, return this completed form within 5 days of becoming aware of the violation to:

City of Broken Arrow,
Post Office Box 610
Broken Arrow, OK 74012
Attn: Industrial Pretreatment Coordinator

PHONE: (918) 259-7000 ext. 7220, FAX: (918) 251-3383, EMAIL: lwilson@brokenarrowok.gov
Fax or email may be used to meet 5 day requirement. Original may be included with next monthly report.



Custom & Commercial Coatings

Reviewed By

MAY 31 2017

LW

May 25, 2017

RECEIVED
6-20-17

Lauren Wilson
Pretreatment Coordinator
City of Broken Arrow
P.O. Box 610
Broken Arrow, OK 74013

Lauren,

This is in response to the violation of the reported zinc levels at 5.73mg/L which was 2.61mg/L over the daily limit. We believe the cause to be a possible combination of two incidences.

- (1) At the time of the testing there was an isolated run of galvanized parts.
- (2) We subsequently discovered a fresh water valve that was not operating correctly, which could account for the exceptionally high values.

We have corrected the problem with the fresh water valve and are in the process of performing a series of water tests through Green Country Testing, one of which you have already received.

Yours truly,

Shane Vaughn
Broken Arrow Powder Coating

BROKEN ARROW POWDER COATING, INC.

P.O. BOX 3637 • Broken Arrow, OK 74013-3637 • Office: (918) 251-2192 • Fax: (918) 251-2247

DISCHARGE LIMIT VIOLATIONS

Number of noncompliant samples - previous 6 months

pH Violations	1 to 3		4 to 6		7 to 8		9 to 10		11 to 12		>12	
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
	Y	N	Y	N	Y	N	Y	N	Y	N	Y	N
<2 std pH units	5	6	4	5	7*	10*	6*	8*				
2.0 to <3.0 std pH units	4	5	3	4	6	8*	5	7*				
3.0 to <4.0 std pH units	3	4	2	3	4	7*	4	5*				
4.0 to <5.0 std pH units	2	3	1	2	4	6	3	4				
5.0 to <6.0 std pH units	1	2	1	2	3	5	2	3				
>10.5 to 11.0 std pH units	1	2	1	1	3	5	2	3				
>11.0 to 11.5 std pH units	1	3	1	2	4	6	3	4				
>11.5 to 12.0 std pH units	2	4	1	3	5	7*	4	5				
>12.0 to 12.5 std pH units	3	5	2	4	6	8*	5	6				
>12.5 to 13.0 std pH units	4	6	3	5	7	9*	6	7				
>13.0 std pH units	5	7	4	6	8*	10*	7*	8*				
Regulated parameters (except pH)												
>1.0 to 1.5 X discharge limit	2	3	2	3	4	5	3	4				
1.5 to <2.5 X discharge limit	3	4	1	3	4	5	2	3				
2.5 to <3.5 X discharge limit	4	5	2	4	5	6	4	5				
3.5 to <5.0 X discharge limit	5	6	3	5	6	8*	5	6				
5.0 to <6.0 X discharge limit	6	7	4	6	7	9*	6	7				
6.0 to <7.5 X discharge limit	7	8	5	7	8*	10*	7	8*				
7.5 to <10.0 X discharge limit	8	9	6	8	9*	10*	8	9*				
>10.0 X discharge limit	8	10*	7	8	9*	10*	8*	9*				

Legend:

2 = \$25	4 = \$100	7 = \$350	10 = \$1000
3 = \$50	5 = \$200	8 = \$500	* = Compliance Order
	6 = \$250	9 = \$750	

Note 1: All discharge limit violations which adversely effect the POTW result in an industry being issued a compliance order and a minimum of a \$500 fine. All discharge limit violations which cause an NPDES permit violation result in an industry being issued a compliance order and a \$1000 fine.

Note 2: The fines listed herein may be issued for each day of which a single continuing violation occurs.

Note 3: The enforcement techniques listed herein shall not be a pre-requisite for taking any other action against an industrial user.

Wilson, Lauren

From: Wilson, Lauren
Sent: Monday, June 05, 2017 4:03 PM
To: 'Jan Brown'; svaughn@bapowdercoating.com
Subject: Metal Finishing SNC Calculation Worksheet BAPC052617.xlsx
Attachments: Metal Finishing SNC Calculation Worksheet BAPC052617.xlsx

Jan,

Thank you for the zinc reports. This is a significant non-compliance calculation sheet for the monitoring results from May. There was one daily violation which was also a TRC violation on May 5, 2017. Broken Arrow Powder Coating has already received a notice of violation. The monthly average is 1.471125mg/L which is below the limit of 1.48mg/L. My calculations show that there was no "significant violation" for this quarter. Thank you for your diligence. Please continue with your normal sampling schedule.

Lauren Wilson
Pretreatment Coordinator
City of Broken Arrow



485 N. Poplar Ave.
P.O. Box 610
Broken Arrow, OK 74012
918.259.7000 Ext. 7220 – Office
www.brokenarrowok.gov

This message is intended only for the use of the individual or entity to which it is addressed and may contain information that is privileged, confidential and exempt from disclosure under applicable law. If you receive this message in error, you are hereby notified that the City of Broken Arrow does not consent to any reading, dissemination, distribution or copying of this message. If you have received this communication in error, please notify the sender and destroy the transmitted information immediately.

Metal Finisher SNC Calculation Sheet

	5/5/2017		5/19/2017							
Parameter	Result 1 (mg/L)	Daily TRC 1	Result 2 (mg/L)	Daily TRC 2	Result 3 (mg/L)	Daily TRC 3	Result 4 (mg/L)	Daily TRC 4	Monthly Average	Monthly Avg TRC
Arsenic	0.133	0.133							0.133	0.133
Cadmium	0.00105	0.00105							0.00105	0.00105
Chromium	0.0324	0.0324							0.0324	0.0324
Copper	0.346	0.346							0.346	0.346
Cyanide	0	0							0	0
Lead	0	0							0	0
Molybdenum	0.0321	0.0321							0.0321	0.0321
Mercury	0	0							0	0
Nickel	0.125	0.125							0.125	0.125
Selenium	0	0							0	0
Silver	0	0							0	0
Zinc	5.73	5.73	0.0554	0.554	0.0353	0.0353	0.0638	0.0638	1.471125	1.471125

Results above daily TRC limit = 25%



**Water and Sewer Department
Water Quality Assurance**

91 7199 9991 7036 2774 3465

October 11, 2017

Southwestern Regional Medical Center
Attention: Nathan Huffstetler
10109 E. 79th St.
Tulsa, OK 74133

Re: Violation of Sewer Use Ordinance; Title 11-C, Chapter 12, City of Tulsa Code of Revised Ordinances

Notice of Violation

Dear Mr. Nathan Huffstetler:

Southwestern Regional Medical Center has been found to be in violation of the provisions of Section 1205 of the Sewer Use Ordinance and Section III of the facility's Industrial Wastewater Discharge Permit # 5975. Specifically, Southwestern Regional Medical Center is non-compliant for failing to submit a required compliance report in a complete and timely manner.

Section III of the permit stipulates that the deadline for the submittal of a required annual compliance report is the last day of the month of July. However, the compliance report due July 31, 2017, was not received in this office in a completed form until August 9, 2017.

Report Submitted	Report Due Date	Report Completed Date	Number of Days Late	Failure Rate
5/30/2017	8/31/2017	9/20/2017	20	2 nd late report in 2 years

Due to the significance of this violation the following enforcement action is hereby imposed:

- The assessment of a **fine of \$50.00.**
- The submittal of a written response detailing the likely cause of the violation and a description of the corrective actions taken in order to demonstrate consistent compliance regarding the violation outlined in this Notice of Violation.

Proper payment totaling **\$50.00 (payable to the City of Tulsa)** and the **written response** are to be submitted, **within fifteen (15) days** following receipt of this notice, to the following address:

Industrial Pretreatment
Attention: Pretreatment Manager
4818 South Elwood Avenue
Tulsa, OK 74107-8129

Southwestern Regional Medical Center
October 11, 2017

Failure to comply with this notice, as well as continued violations, may result in some combination of the following enforcement actions:

Please note that failure to submit the required self-monitoring compliance reports in a timely manner is also a violation of Federal Regulations at 40 CFR Part 403.12 and continued violations by Southwestern Regional Medical Center could result in some combination of the following escalated enforcement actions:

- Disconnection from the sanitary sewer and/or water service, and the assessment against Southwestern Regional Medical Center of all expenses incurred in such disconnection and/or reconnection,
- Revocation of Southwestern Regional Medical Center's Industrial Wastewater Discharge Permit; and,
- The issuance of penalties in amounts not to exceed \$1,000.00, plus costs, for each violation. Each day of non-compliance may constitute a separate instance of violation.

Pursuant to the procedures set forth in Section 1209 (D) of the aforementioned Ordinance, persons desiring to dispute this action must file a written request for reconsideration within fifteen (15) days following the receipt of this notice. The aforementioned Ordinance Title 11-C, Chapter 12 can be found at the website link below:

https://library.municode.com/ok/tulsa/codes/code_of_ordinances?nodeId=CD_ORD_TIT11-CWASE_CH12SEUS

Please contact Bryan Smith at 918-591-4389 or Cindy Cantero at 918-591-4393, if you have any questions or concerns.

Sincerely,



Cindy Cantero, Pretreatment Manager
Water Quality Assurance

cc: Jo Brown, Water Quality Assurance Manager

cc: Enforcement File

ENFORCEMENT RESPONSE ACTION

Do Not Mail – For File Use Only

INDUSTRY	Southwestern Regional Medical Center	FACILITY ID	5975
DATE OF VIOLATION 8/31/17	NATURE OF VIOLATION Failing to submit a required compliance report in a complete and timely manner.		
VIOLATIONS THAT HAVE OCCURRED IN THE LAST 12 months		NUMBER OF VIOLATIONS 1	
NATURE OF VIOLATION(S) (Explain Below) 3/15/17 Report incomplete or needing correction			
INDUSTRY'S COMPLIANCE STATUS: COMPLIANT ☒ NON COMPLIANT ☐ SIGNIFICANT VIOLATOR ☐			
INDUSTRY EXHIBITING GOOD FAITH EFFORT? (Explain below)		YES ☒	NO ☐
ENFORCEMENT RESPONSE PLAN ACTION: NOV + \$50			
ENFORCEMENT ACTION TAKEN: NOV + \$50			
COMMENTS:			
ACTION TAKEN BY:	Bryan Smith	DATE	9/28/17

Surcharge Data											
Units											
Date	Volume Mgal	BOD mg/L	TSS mg/L	O&G mg/L	BOD lbs	TSS lbs	O&G lbs	Surcharge BOD	Surcharge TSS	Surcharge O&G	Total Surcharge
FY-2017											
Jul-16	2,331,138	575.75	0.00	0.00	11193.55	0.00	0.00	\$5,596.78	\$0.00	\$0.00	\$5,596.78
Aug-16	2,258,666	668.00	0.00	0.00	12583.27	0.000	0.00	\$6,291.63	\$0.00	\$0.00	\$5,291.63
Sep-16	2,234,443	502.00	0.00	0.00	9354.84	0.00	0.00	\$4,677.42	\$0.00	\$0.00	\$4,677.42
Oct-16	2,154,965	475.00	0.00	0.00	8536.89	0.00	0.00	\$4,268.45	\$0.00	\$0.00	\$4,268.45
Nov-16	2,187,151	594.75	0.00	0.00	10848.73	0.00	0.00	\$5,424.37	\$0.00	\$0.00	\$5,424.37
Dec-16	3,306,865	430.75	0.00	0.00	11879.76	0.00	0.00	\$5,939.88	\$0.00	\$0.00	\$5,939.88
Jan-17	2,331,151	553.50	0.00	0.00	10762.69	0.00	0.00	\$5,381.35	\$0.00	\$0.00	\$5,381.35
Feb-17	2,102,101	538.75	0.00	0.00	9445.10	0.00	0.00	\$4,722.55	\$0.00	\$0.00	\$4,722.55
Mar-17	2,427,461	568.50	0.00	0.00	11509.29	0.00	0.00	\$5,754.65	\$0.00	\$0.00	\$5,754.65
Apr-17	2,176,051	407.00	0.00	0.00	7386.34	0.00	0.00	\$3,693.17	\$0.00	\$0.00	\$3,693.17
May-17	2,367,781	368.75	0.00	0.00	7281.81	0.00	0.00	\$3,640.91	\$0.00	\$0.00	\$3,640.91
Jun-17	2,472,561	108.25	0.00	0.00	2232.24	0.00	0.00	\$1,116.12	\$0.00	\$0.00	\$1,116.12
Ave											
								TOTAL			
FY-2018											
Jul-17	1,984,161	329.75	0.00	66.45	5456.67	0.00	1099.61	\$2,728.33	\$0.00	\$175.94	\$2,904.27
Aug-17	2,052,821	441.25	0.00	0.00	7554.43	0.000	0.00	\$3,777.21	\$0.00	\$0.00	\$3,777.21
Sep-17	1,545,339	581.75	0.00	0.00	7497.92	0.00	0.00	\$3,748.96	\$0.00	\$0.00	\$3,748.96
Oct-17					0.00	0.00	0.00	\$0.00	\$0.00	\$0.00	\$0.00
Nov-17					0.00	0.00	0.00	\$0.00	\$0.00	\$0.00	\$0.00
Dec-17					0.00	0.00	0.00	\$0.00	\$0.00	\$0.00	\$0.00
Jan-18					0.00	0.00	0.00	\$0.00	\$0.00	\$0.00	\$0.00
Feb-18					0.00	0.00	0.00	\$0.00	\$0.00	\$0.00	\$0.00
Mar-18					0.00	0.00	0.00	\$0.00	\$0.00	\$0.00	\$0.00
Apr-18					0.00	0.00	0.00	\$0.00	\$0.00	\$0.00	\$0.00
May-18					0.00	0.00	0.00	\$0.00	\$0.00	\$0.00	\$0.00
Jun-18					0.00	0.00	0.00	\$0.00	\$0.00	\$0.00	\$0.00
Ave								TOTAL			
\$369.20											
\$10,430.44											

Oct. 16-Sep. 17
\$50,371.88

SECTION 4

SIGNIFICANTLY NON-COMPLIANT INDUSTRIAL USERS

SIGNIFICANTLY NONCOMPLIANT USERS

[illegible]

Additional Notes:

SECTION 5

NEWSPAPER PUBLICATION OF SIGNIFICANTLY NON- COMPLIANT INDUSTRIAL USERS

No Industrial User in the Haikey Creek Wastewater Treatment Plant Basin was determined to be significantly non-compliant for the period of October 1, 2016 to September 30, 2017. Subsequently, no newspaper publication was made for this period.

SECTION 6

COMPLIANCE SCHEDULES

No Industrial User in the Haikey Creek Wastewater Treatment Plant Basin was required to be on a Compliance Schedule for the year of October 1, 2016 through September 30, 2017.

SECTION 7

HAIKEY CREEK WASTEWATER TREATMENT PLANT

*WATER QUALITY BASED EFFLUENT
CONCENTRATIONS*

POTW MONITORING RESULTS SUMMARY TABLE																	
Regional Metropolitan Utility Authority - Hailkey Creek Wastewater Treatment Plant																	
TABLE III: METALS CYANIDE PHENOLS + Molybdenum	MQL (mg/l)	MDL Used (mg/l)	INFLUENT (mg/l)				EFFLUENT (mg/l)				OK LIMIT (mg)	MAHL (TBL) LB/DAY	HEADWORK LOADING FOR THE REPORTING PERIOD LB/DAY				
			Sample Dates				Sample Dates						Sample Dates				
			11/15/16	2/21/17	5/23/17	8/22/17	11/16/16	2/22/17	5/24/17	8/23/17			11/15/17	2/21/17	5/23/17	8/22/17	% of MAHL
Flow, mgd			10.03	10.06	13.46	10.31	8.98	10.28	12.28	8.70							
Antimony	0.06	0.01	< 0.01	< 0.01	< 0.01	< 0.010	< 0.01	< 0.01	< 0.01	< 0.01	N/A	N/A	0.41825	0.41950	0.56128	0.42993	0.45724
Arsenic	0.01	0.01	< 0.01	< 0.01	< 0.01	< 0.005	< 0.01	< 0.01	< 0.01	< 0.005	0.99687	8.18	0.41825	0.41950	0.56128	0.21496	0.40350
Beryllium	0.005	0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	N/A	N/A	0.20913	0.20975	0.28064	0.21496	0.22862
Cadmium	0.001	0.001	< 0.001	< 0.0010	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001	0.3989	5.67	0.04183	0.04195	0.05613	0.04299	0.04572
Chromium	0.01	0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	0.84451	81.77	0.41825	0.41950	0.56128	0.42993	0.45724
Copper	0.01	0.01	0.097	0.731	0.068	0.08	< 0.0100	0.1180	< 0.01	< 0.01	0.12816	45.64	8.11407	61.33119	7.63344	6.87883	20.98938
Lead	0.005	0.005	< 0.005	< 0.0050	< 0.0050	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.1765	25.17	0.20913	0.20975	0.28064	0.22399	0.23088
Mercury	0.0002	0.0001	< 0.0001	0.0001	< 0.0001	< 0.0001	< 0.0001	< 0.0001	< 0.0001	< 0.0001	0.00665	0.9331	0.00418	0.01024	0.00561	0.00430	0.00608
Molybdenum	0.03	0.01	< 0.010	< 0.0100	< 0.01	< 0.01	< 0.010	< 0.0100	< 0.01	< 0.01	N/A	12.0433	0.41825	0.41950	0.56128	0.42993	0.45724
Nickel	0.04	0.005	< 0.005	0.00572	< 0.005	< 0.01	< 0.005	< 0.005	< 0.005	< 0.01	5.869	32.87	0.20913	0.47991	0.28064	0.42993	0.34990
Selenium	0.005	0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.055	6.29	0.20913	0.20975	0.28064	0.21496	0.22862
Silver	0.002	0.002	< 0.002	< 0.002	< 0.002	< 0.002	< 0.002	< 0.002	< 0.002	< 0.002	0.05605	14.5	0.08365	0.08390	0.11226	0.08599	0.09145
Thallium	0.01	0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	1.593	N/A	0.41825	0.41950	0.56128	0.42993	0.45724
Zinc	0.02	0.01	0.118	0.1020	0.0741	0.093	0.633	0.518	0.053	0.0450	0.71509	24.53	9.87072	8.55784	8.31820	7.95365	8.67310
Sample Dates			11/15/16	2/21/17	5/23/17	8/22/17	11/16/16	2/22/17	5/24/17	8/23/17			11/15/16	2/21/17	5/23/17	8/22/17	
Flow, mgd			10.03	10.06	13.46	10.31	8.98	10.28	12.28	8.70							
Cyanide	0.01	0.006	< 0.006	< 0.006	< 0.006	< 0.00600	< 0.006	< 0.006	< 0.006	< 0.006	0.12718	8.18	0.25095	0.25170	0.33677	0.25796	0.27434
Total Phenolics	N/A	0.03	< 0.025	0.127	0.099	0.109	< 0.025	0.031	< 0.025	< 0.025	N/A	N/A	1.04563	10.65535	11.11338	9.37241	8.04669
OTHER POLLUTANTS DETECTED (TABLE II)	MQL (ug/l)	MDL (ug/l)	INFLUENT (ug/l)				EFFLUENT (ug/l)				OK LIMIT (ug/l)	MAHL (TBL) LB/DAY	HEADWORK LOADING FOR THE REPORTING PERIOD, LB/DAY				
			Sample Dates				Sample Dates						Sample Dates				
			11/15/16	2/21/17	5/23/17	8/22/17	11/16/16	2/22/17	5/24/17	8/23/17			11/15/17	2/21/17	5/23/17	8/22/17	% of MAHL
Dalapon	N/A	0.25									N/A	N/A	—	0.05896	—	—	0.056
Methylene Chloride	20	5									N/A	N/A	—	0.05896	—	0.05896	1.367
Bis(2-ethylhexyl) phthalate	10	10.9									N/A	N/A	—	—	—	0.05896	1.058
Note: Influent and effluent samples should be collected considering flow detention time through the POTW																	
VALUES BELOW DETECTION LEVEL ARE CALCULATED AS 1/2 THE VALUE																	
Note: Only table II values above MDL will be recorded																	
BDL Not detected above MDL																	
MDL Method Detection Limit																	
MQL EPA Region 6 Minimum Quantification Level (Analytical MDL should meet this criteria so that data can be used for Local Limit assessments and OPDES application data.)																	

Note: Influent and effluent samples should be collected considering flow detention time through the POTW

VALUES BELOW DETECTION LEVEL ARE CALCULATED AS 1/2 THE VALUE

Note: Only table II values above MDL will be recorded

BDL Not detected above MDL

MDL Method Detection Limit

MQL EPA Region 6 Minimum Quantification Level (Analytical MDL should meet this criteria so that data can be used for Local Limit assessments and OPDES application data.)