



CITY OF
BROKEN ARROW

Where opportunity lives

Utilities Department
Post Office Box 610
Broken Arrow, Oklahoma 74013

To: Mayor Craig Thurmond, Chairman, Regional Metropolitan Utility Authority

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

Date: Tuesday, May 22, 2018

Subject: September 2017 to April 2018 RMUA Pretreatment Report

Dear Mayor Thurmond,

The following is a brief synopsis of the major activities of the Broken Arrow Industrial Pretreatment Program for the period of September 2017 to April 2018. This update regards pretreatment issues and industrial wastewater discharges pertaining to the R.M.U.A.'s Haikey Creek WWTP.

September 2017

Fats, Oil & Grease (FOG) Program Activities

1. Food Handling Establishment Inspections:

- Broken Arrow Pretreatment staff performed 45 food handling establishment inspections in the month of September. Staff inspected manifests for grease interceptor maintenance, inspected the interceptors, and discussed best management practices with management. Establishments with interceptors that were improperly maintained or in need of repair were given 15 days to correct the deficiency. Re-checks were done for non-compliance issues.

2. Pretreatment Program Administration:

- Pretreatment staff encouraged residents to recycle used cooking oil. Free cooking oil recycle containers and recycling instructions were available to residents at the City of Broken Arrow One-Stop Center and utilities billing kiosk.

Industrial Pretreatment Activities:

1. Industrial Pretreatment Program Administration:

- Industrial User Survey - Staff mailed paper surveys to 100 Broken Arrow businesses as a part of the 5-year comprehensive industrial user survey that is required by the Department of Environmental Quality. The purpose of the survey is to inventory all non-residential wastewater discharges in Broken Arrow, to identify the businesses that have a potential to negatively impact the wastewater treatment system, and to issue wastewater discharge permits to significant industrial users. All automotive shops, car washes, and machine shops were previously inspected as a part of the comprehensive survey and the remaining 100 businesses were inspected based upon paper survey information. City staff spoke with businesses about best management practices to control wastewater pollution and inspected chemical storage areas, waste hauling manifests, and maintenance records for pretreatment facilities.

- Unifirst – The wastewater discharge permit was renewed. Unifirst submitted a permit application packet including an accidental spill prevention plan to the City of Broken Arrow pretreatment office for approval. Pretreatment staff reviewed the information submitted by Unifirst, as well as the last pretreatment inspection form, and incorporated necessary changes into the new permit. The City of Broken Arrow Utilities Director then reviewed and signed the permit and it was issued to Unifirst.

2. Compliance monitoring reports and laboratory analysis:

- Unifirst – The compliance self-monitoring report and laboratory analysis was received and reviewed. No deficiencies were noted. Monthly surcharges for conventional pollutants above residential thresholds were calculated in the amount of \$3,777.21 and submitted to the City of Broken Arrow Finance Department.
- Yearly Control Authority Sample - The City's yearly analytical for Unifirst was received and reviewed. No deficiencies were noted.
- Haikey Creek Wastewater Treatment Plant – The quarterly influent and effluent priority pollutant laboratory reports were received and reviewed. No deficiencies were noted.

3. Industrial Inspections:

- Blessings International – The facility was inspected as a part of the industrial wastewater user survey. The survey they submitted listed operations as “pharmaceutical repackaging”. City staff performed an inspection to make sure pharmaceuticals were not being discharged to the sewer system. Standard operating procedures at this site have been developed to keep any residual pharmaceuticals from being washed down the drain. No permit was issued.

October 2017

Fats, Oil & Grease (FOG) Program Activities

1. Food Handling Establishment Inspections:

- City of Broken Arrow Pretreatment staff performed 53 food handling establishment inspections in the month of October. Staff inspected manifests for grease interceptor maintenance, inspected the interceptors, and discussed best management practices with management. Establishments with interceptors that were improperly maintained or in need of repair were given 15 days to correct the deficiency. Re-checks were done for non-compliance issues.

Industrial Pretreatment Activities:

1. Industrial Pretreatment Program Administration:

- Annual Pretreatment Report to the DEQ – The report was submitted to DEQ for Haikey Creek Wastewater Treatment Plant. The report is required to cover the period of October 1st to September 30th and is due by October 31st. The following items were covered:
 1. An updated list of significant industrial users within the treatment basin
 2. Permit or control document status
 3. A summary of all monitoring activities performed, such as inspections performed and sampling visits conducted
 4. Status of compliance with effluent limitations and reporting requirements for our permittees
 5. A list of significantly violating industries
 6. Enforcement actions performed by the City of Broken Arrow
 7. Influent and Effluent sampling done at the wastewater plant

8. A comparison of technically based local limits given to industrial users in their permits, maximum allowable headworks loading calculations for the wastewater treatment plant, and Oklahoma water quality limits for the receiving stream
9. Pollution prevention and community awareness efforts

I have attached the FY 2017 RMUA Annual Report to the DEQ for your review.

2. Compliance monitoring reports and laboratory analysis:

- Unifirst – The compliance self-monitoring report and laboratory analysis was received and reviewed. No deficiencies were noted. Monthly surcharges for conventional pollutants above residential thresholds were calculated in the amount of \$3,748.96 and submitted to the City of Broken Arrow Finance Department.
- CSI Aerospace – The compliance self-monitoring report and laboratory analysis was received and reviewed. No deficiencies were noted.

November 2017:

Fats, Oil & Grease (FOG) Program Activities

1. Food Handling Establishment Inspections:

- City of Broken Arrow Pretreatment staff performed 37 food handling establishment inspections in the month of November. Staff inspected manifests for grease interceptor maintenance, inspected the interceptors, and discussed best management practices with management. Establishments with interceptors that were improperly maintained or in need of repair were given 15 days to correct the deficiency. Re-checks were done for non-compliance issues.

Industrial Pretreatment Activities:

1. Industrial Pretreatment Program Administration:

- Quarterly Oklahoma Pretreatment Meeting – The City of Broken Arrow Utilities Department hosted the Quarterly Oklahoma Pretreatment Meeting in November. The topics of the meeting were as follows:
 - Encouraging Community and Commercial Recycling- Graham Brannin, Executive Director, Metropolitan Environmental Trust.
 - Environmental Laboratory Regulation Updates – Brian Duzan, Laboratory Director, Green Country Testing
 - Funding Your Pretreatment Program Through Water Rates – Jerry Gates, Pretreatment Coordinator, City of Oklahoma City
 - Resource Conservation and Recovery Act/Hazardous Waste Rules for Industry Inspections – Ryan Kirk, Environmental Specialist, Oklahoma Department of Environmental Quality
 - EPA's Dental Amalgam Rule/State of Oklahoma Implementation – Roshini Nambiar, Municipal Pretreatment Coordinator, Oklahoma Department of Environmental Quality
- Oklahoma Pollutant Discharge Elimination System (OPDES) Permit - The Lynn Lane Wastewater Treatment Plant OPDES Permit No. OK0040053 was renewed effective October 1, 2017. The Haikey Creek Wastewater Treatment Plant OPDES Permit No. OK0034363 expired on May 31, 2018. A requirement of both permits is to submit to DEQ, within 60 days of the effective date of the permit, a written certification that a technical evaluation has been performed demonstrating that the existing technically based local limits (TBLL) are based upon the current state water quality standards and are adequate to prevent pass through of pollutants, inhibition of or interference with the treatment facility, worker health and safety problems, and sludge contamination **OR** submit a written notification that a technical evaluation revising the current TBLL and a draft sewer use ordinance which incorporates such revisions will be submitted within 12 months of the effective date of the permit. City of Broken Arrow Pretreatment staff

submitted to the Oklahoma Department of Environmental Quality a "Notice of Intent" to perform a Technically Based Local Limits Study for both Lynn Lane and Haikey Creek Wastewater Treatment Plants by May 31, 2019. The notice of intent is attached for your review.

2. Compliance monitoring reports and laboratory analysis:

- Unifirst – The compliance self-monitoring report and laboratory analysis was received and reviewed. No deficiencies were noted. Monthly surcharges for conventional pollutants above residential thresholds were calculated in the amount of \$2,820.87 and submitted to the Finance Department.
- Haikey Creek Wastewater Treatment Plant – The influent and effluent priority pollutant laboratory analysis was received and reviewed. No deficiencies were noted.

December 2017:

Fats, Oil & Grease (FOG) Program Activities

1. Food Handling Establishment Inspections:

- City Pretreatment staff performed 42 food handling establishment inspections in the month of December. Staff inspected manifests for grease interceptor maintenance, inspected the interceptors, and discussed best management practices with management. Establishments with interceptors that were improperly maintained or in need of repair were given 15 days to correct the deficiency. Re-checks were done for non-compliance issues.

2. FOG Program Administration:

- Merritt's Bakery South - A notice of violation and \$500 fine was issued to Merritt's Bakery South on December 13, 2017. Background: In October 2017, a notice of non-compliance was issued by City of Broken Arrow Pretreatment staff giving Merritt's Bakery 15 days to make repairs to the facility's grease interceptor. The repairs had previously been brought to the attention of Merritt's Bakery South in June 2017 when their maintenance company, Brook's Grease made a note that the grease interceptor needed to be replaced because the baffle wall was down. No response to the Pretreatment Office or repairs had been made by December 13, 2017 when the notice of violation was issued. The fine was paid and the grease interceptor was replaced on January 19, 2018.

Industrial Pretreatment Activities:

1. Industrial Inspections:

- Comgraphx – Pretreatment staff performed a follow-up inspection after receiving the "Industrial User Survey". Communication Graphics was issued a wastewater discharge permit, effective February 1, under the Pretreatment Program for the screen production line, film production line, and flexographic plate process.
- Empire Laser - Pretreatment staff performed a follow-up inspection after receiving the "Industrial User Survey". No permit will be issued to this facility.
- Paragon Films - Pretreatment staff performed a follow-up inspection after receiving the "Industrial User Survey". No permit will be issued to this facility.

2. Compliance monitoring reports and laboratory analysis:

- Unifirst - The compliance self-monitoring report and laboratory analysis was received and reviewed. No deficiencies were noted. Monthly surcharges for conventional pollutants above residential thresholds were calculated in the amount of \$2,160.69 and submitted to the Finance Department.

January 2018:

Fats, Oil & Grease (FOG) Program Activities

1. Food Handling Establishment Inspections:

- City Pretreatment staff performed 45 food handling establishment inspections in the month of January. Staff inspected manifests for grease interceptor maintenance, inspected the interceptors, and discussed best management practices with management. Establishments with interceptors that were improperly maintained or in need of repair were given 15 days to correct the deficiency. Re-checks were done for non-compliance issues.

2. FOG Program Administration:

- Union Public Schools - Pretreatment staff met with Union Public Schools to issue "Best Management Practice" documents for Christa McAuliffe and Tom Peters Elementary Schools. Lisa Griffin and Vivian Brown attended for Union Public Schools. Lisa Griffin, Director of Child Nutrition, signed the documents, certifying that the practices would be implemented immediately to reduce fats, oil, and grease discharges from the two kitchen facilities. These facilities will not be required to install grease interceptors at this time.

Industrial Pretreatment Activities:

1. Industrial Permitting:

- Comgraphx – The facility Maintenance Manager submitted a permit application, accidental spill prevention plan, process schematics, and safety data sheets for chemicals used in wastewater processes. Pretreatment staff reviewed the application, drafted a permit, and scheduled the first compliance monitoring event.
- Broken Arrow Powder Coating (Location 2)- The wastewater discharge permit was renewed. Broken Arrow Powder Coating submitted a permit application packet including an accidental spill prevention plan and Toxic Organic Management Plan to the City of Broken Arrow Pretreatment office for approval. Pretreatment staff reviewed the information in the application packet, as well as the last pretreatment inspection form, and incorporated necessary changes into the new permit. The Utilities Director then reviewed and signed the permit and it was issued to Broken Arrow Powder Coating (Location 2).

2. Compliance reports and laboratory analysis:

- Unifirst - The compliance self-monitoring report and laboratory analysis for December were received and reviewed. No deficiencies were noted. Monthly surcharges for conventional pollutants above residential thresholds were calculated in the amount of \$1,801.13 and submitted to the Finance Department.

February 2018:

Fats, Oil & Grease (FOG) Program Activities

1. Food Handling Establishment Inspections:

- City Pretreatment staff performed 35 food handling establishment inspections in the month of February. Staff inspected manifests for grease interceptor maintenance, inspected the interceptors, and discussed best management practices with management. Establishments with interceptors that were improperly maintained

or in need of repair were given 15 days to correct the deficiency. Re-checks were done for non-compliance issues.

2. Car Wash Inspections:

- City Pretreatment staff performed 5 car wash inspections in the month of February. Staff inspected manifests for sand interceptor and oil/water separator maintenance, inspected the interceptors, and discussed best management practices with management. Establishments with interceptors that were improperly maintained or in need of repair were given 15 days to correct the deficiency. Re-checks were done for non-compliance issues. "No Dumping" signs are being distributed to self-service facilities asking the public not to dump motor oil or chemicals into car wash bays. Car wash management is encouraged to contact the City for assistance if they notice anyone dumping something that they shouldn't.

3. FOG Program Administration:

- Forest Hills Adult Care Facility – The facility replaced the kitchen grease interceptor as requested.

Industrial Pretreatment Activities:

1. Compliance reports and laboratory analysis:

- Unifirst – The compliance self-monitoring report and laboratory analysis for January were received and reviewed. No deficiencies were noted. Monthly surcharges for conventional pollutants above residential thresholds were calculated in the amount of \$1,517.81 and submitted to the Finance Department.
- Comgraphx - The first self-monitoring report and laboratory analysis for this facility was received and reviewed on February 2, 2018. The report revealed a silver result of 4.70 mg/L for the sample taken on January 26, 2018. This is a violation of the permitted limit of 0.5 mg/L. Comgraphx submitted a 24-hour notification form to the Pretreatment Office that listed an improperly sized silvery recovery system as the cause of the violation and subsequently called the Pretreatment Office to report that the system had been upsized. Comgraphx was asked to perform a retest within 30 days. The retest, performed on February 14, 2018, revealed a silver result of 1.65 mg/L. Comgraphx called the Pretreatment Office to report that the silver recovery system had been upsized a second time, and again was asked to retest. See the update in March.

March 2018

Fats, Oil & Grease (FOG) Program Activities

1. Food Handling Establishment Inspections:

- City pretreatment staff performed 21 food handling establishment inspections in the month of March. Staff inspected manifests for grease interceptor maintenance, inspected the interceptors, and discussed best management practices with management. Establishments with interceptors that were improperly maintained or in need of repair were given 15 days to correct the deficiency. Re-checks were done for non-compliance issues.

2. Car Wash Inspections:

- City Pretreatment staff performed 4 car wash inspections in the month of March. Staff inspected manifests for sand interceptor and oil/water separator maintenance, inspected the interceptors, and discussed best management practices with management. Establishments with interceptors that were improperly maintained or in need of repair were given 15 days to correct the deficiency. Re-checks were done for non-compliance issues. "No Dumping" signs are being distributed to self-service facilities asking the public not to dump motor oil or chemicals into car wash bays. Car wash management is encouraged to contact the City for assistance if they notice anyone dumping something that they shouldn't.

Industrial Pretreatment Activities:

1. Industrial Pretreatment Program Administration:

- Quarterly Oklahoma Pretreatment Meeting - Pretreatment staff attended the Quarterly Oklahoma Pretreatment Coordinator's meeting in Shawnee.

2. Compliance reports and laboratory analysis:

- Unifirst -The compliance self-monitoring reports and laboratory analysis were received and reviewed. No deficiencies were noted. Monthly surcharges for conventional pollutants above residential thresholds were calculated in the amount of \$1,620.13 and submitted to the Finance Department.
- Comgraphx – The two laboratory results from March were progressively lower than the initial sample, but still above City of Broken Arrow local limits. The City of Broken Arrow Pretreatment Office is giving Comgraphx 90 days to come into compliance with the permit before asking the facility to hire a contractor to haul the wastewater offsite. Comgraphx has upsized the silver recovery unit, pumped out the oil/water separator that collects flow from the unit, and jetted the sewer line feeding into the oil/water separator. Another sample was performed after these actions. See the update in April.
- Haikey Creek Wastewater Treatment Plant - The influent and effluent priority pollutant laboratory analysis was received and reviewed. No deficiencies were noted.

April 2018

Fats, Oil & Grease (FOG) Program Activities

1. Fats, Oil, and Grease Program Administration:

- Wyland National Mayor's Challenge for Water Conservation – Broken Arrow Pretreatment staff participated in the 2018 Mayor's Challenge for Water Conservation which lasted the whole month of April. Mayor Thurmond joined mayors across the nation in asking residents to be more water-wise by making a pledge to change daily habits and perform easy tasks at home to save money, conserve water and energy, and promote water quality in local watersheds. Pretreatment staff visited private schools and daycare centers and spoke to management about the impact that water conservation has on water quality. Earth Day activity books were distributed for each student. Staff also set up a booth at the Farmer's Market and visited local charities, technical schools and universities handing out water quality brochures and 5-minute shower timers. At the

last count, Broken Arrow was in 18th place out of about 1000 cities. Final results of the challenge will be released by May 21st. This challenge was a wonderful opportunity for Pretreatment staff to speak to the public about water quality and pollution prevention in the home. Broken Arrow did an outstanding job in the challenge and hopefully Mayor Thurmond will take the challenge in years to come.

2. Food Handling Establishment Inspections:

- Broken Arrow Pretreatment staff performed 27 food handling establishment inspections in the month of April. Staff reviewed manifests for grease interceptor maintenance, inspected the interceptors, and discussed best management practices with management. Establishments with interceptors that were improperly maintained or in need of repair were given 15 days to correct the deficiency. Re-checks were done for non-compliance issues.

3. Car Wash Inspections:

- Broken Arrow Pretreatment staff performed 2 car wash inspections in the month of April. Staff inspected manifests for sand interceptor and oil/water separator maintenance, inspected the interceptors, and discussed best management practices with management. Establishments with interceptors that were improperly maintained or in need of repair were given 15 days to correct the deficiency. Re-checks were done for non-compliance issues. "No Dumping" signs are being distributed to self-service facilities asking the public not to dump motor oil or chemicals into car wash bays. Car wash management is encouraged to contact the City for assistance if they notice anyone dumping something that they shouldn't.

Industrial Pretreatment Activities:

1. Industrial Pretreatment Program Administration:

- The Annual Pretreatment Compliance Inspection was performed by DEQ. DEQ will mail a report of the findings. Components of the inspection are as follows:
 - OPDES Permit - Review of current permit for each wastewater treatment plant. DEQ checks to see that permit analytical requirements are being met. Specifically, that monitoring of the influent and effluent of each wastewater treatment plant for priority pollutants is being performed correctly, at the proper intervals, and meets permit limits.
 - Approved Pretreatment Program Document - DEQ reviews the document to see that the ordinance is being enforced and that the approved procedures are being properly implemented.
 - Technically Based Local Limit Study (TBLL) - DEQ reviews the document to see that industrial wastewater discharge permit limits are being applied correctly.
 - Enforcement Response Plan - DEQ reviews the document to see that the plan is enforced.
 - Lynn Lane Wastewater Treatment Plant - DEQ reviews the annual report that was submitted by the City and does a file review to confirm details listed in the report. The Blue Bell Creameries file was audited this year.
 - Haikey Creek Wastewater Treatment Plant - DEQ reviews the annual report that was submitted by the City and does a file review to confirm details listed in the report. The Broken Arrow Powder Coating file was audited this year.
 - Pollution Prevention - DEQ asks about programs and procedures that are not federally mandated, but necessary for reducing sanitary sewer overflows. City of Broken Arrow's pollution prevention efforts include: Food Handling Establishment Best Management Practices, Car Wash Best Management Practices, Automotive Shop Best Management Practices, community involvement and public awareness efforts.

- Pretreatment staff attended Oklahoma Environmental Law Enforcement Training presented by Oklahoma DEQ and Oklahoma State Cooperative Extension Service.

2. Compliance reports and laboratory analysis:

- Unifirst – The compliance self-monitoring report and laboratory analysis were received and reviewed. No deficiencies were noted. Monthly surcharges for conventional pollutants above residential thresholds were calculated in the amount of \$2,288.94 and submitted to the Finance Department.
- Broken Arrow Powder Coating (Location 2) – The compliance monitoring report and laboratory analysis were received and reviewed. No deficiencies were noted.
- Comgraphx – The process wastewater monitoring from this site has revealed silver above the permitted limit. The results have been progressively lower from one sample to the next. Discharge from the silver recovery unit in the film room has stopped until compliance can be determined. A sample taken directly from the other process, screen recovery, revealed silver is below the permitted limit at 0.0118 mg/L. Comgraphx believes the silver is coming from the oil/water separator and is working on correcting the problem. I will provide an update in the report for May.

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,



Lauren Wilson
Pretreatment Coordinator
City of Broken Arrow
Phone: 918.259-7000 ext. 7220
Email: lwilson@brokenarrowok.gov