

REGIONAL METROPOLITAN UTILITY AUTHORITY

175 E. 2ND Street 14-117

Tulsa, Oklahoma 74103

Friday, October 26, 2018

Roshini Schroeder, EPS VI
Municipal Pretreatment Coordinator
Oklahoma Department of Environmental Quality
Municipal Wastewater Field Inspection/Enforcement Section
Water Quality Division
707 N. Robinson
Oklahoma City, OK 73102

Re: FY 2018 Pretreatment Annual Report to DEQ
RMUA/Haikey Creek WWTP
OPDES Permit Number OK0034363

Dear Mrs. Schroeder:

The RMUA/Haikey Creek WWTP Industrial Pretreatment Program Annual Report for the period October 1, 2017 through September 30, 2018 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.

A technically based local limit study is in progress and will be submitted to DEQ by May 31, 2019. I have attached our sampling plan for you to review in Section 7: Water Quality Based Effluent Concentrations.

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 2018. 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 and inspections are performed as needed. A comprehensive IU Survey is performed every 5 years and will be initiated again in 2021.

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One new permit was added to the City of Broken Arrow Industrial Pretreatment Program as a result of the survey during this pretreatment year. Comgraphx/Communication Graphics was issued a City of Broken Arrow Wastewater Discharge Permit in February 2018. 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 2017 to September 2018 Pretreatment year one industrial user was published as significantly non-compliant (SNC), Comgraphx/Communication Graphics. On Thursday, October 11, 2018, a publication was made in the 'Tulsa World listing Comgraphx/Communication Graphics as being a "Significantly Violating Industrial User." The first self-monitoring report and laboratory analysis were received and reviewed on February 2, 2018 for Comgraphx/Communication Graphics. The report revealed a silver result of 4.70 mg/L which 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 silver 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. 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 asked Comgraphx to discontinue discharge from the silver recovery unit.

An initial sample taken from the other process, the Screen Room, revealed silver below the permitted limit at 0.0118 mg/L. However, subsequent self-monitoring at the Screen Room revealed a silver violation. Permit sampling locations were modified to separate the laboratory analysis at the two waste streams. Pretreatment staff performed laboratory analysis at each process waste stream during the yearly inspection. No violations were revealed on the laboratory analysis reports. However, Comgraphx has been asked to modify standard operating procedures to ensure continued compliance.

Comgraphx submitted a 24-hour notification to the City of Broken Arrow Pretreatment Office for each violation. The City of Broken Arrow has remained in constant contact with the facility Maintenance Manager, Jeff Brunner. Comgraphx was issued two written notices of violation. Please see the violation documentation in Section 4: Significantly Non-Compliant Industrial Users.

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Southwest Regional Medical Center was issued a notice of violation (NOV) for incomplete compliance monitoring reports during FY 2018. The first NOV was verbal, per the City of Tulsa enforcement response plan, and the second was a written notice with a \$250 fine. Please see the documentation in Section 3: Non-Compliant Industrial Users.

During FY 2018, Unifirst was issued surcharges in the amount of \$25,535.72 for biochemical oxygen demand (BOD), total suspended solids (TSS), and oil & grease results above residential thresholds per Broken Arrow Municipal Code Manual of Fees. This amount is down from the FY 2017 total of \$50,371.88. Documentation on monthly surcharge amounts is attached for your review in Section 3: Non-Compliant Industrial Users.

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 2018:

I. City of Tulsa

Below is a brief summary of Pollution Prevention (P2) activities of the City of Tulsa. The information contained herein covers the Oct. 1, 2017-September 30, 2018. The City of Tulsa P2 group maintains four full time employees.

A. 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 1679 pounds of medications in total.

We continue to work with the City of Tulsa Stormwater, COOTs, the Metropolitan Environmental Trust (the MET), Tulsa County Medical Society, Tulsa Health Department, 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.

B. 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

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meet. In the past year, staff surveyed/ visited with 71 dental facilities about their amalgam use and educated them about proper amalgam disposal.

C. 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 – 91 total participants; 190- Digital Lifetime PACE participants
2. Printers - 4 participants
3. Individual, industry written - 5 participants
4. Food Handling Facilities - 301 participants
5. Mobile Food Vendor- 63 participants

Silver BMP Program

Most facilities continue to switch from wet processes 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 56 surveys/office visits to silver facilities, and 48 other contacts such as faxes, phone calls, mailings, and emails for the purpose of promoting and encouraging BMP participation and renewal.

Printer BMP Program

3 surveys/office visits were conducted at printing facilities this year. There was 1 email/phone call 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 1365 BMP surveys, and over 619 other contacts, such as follow ups, office visits, investigations, faxes, phone calls, mailings, and emails. Currently, 15% of the City's 2501 FHEs (-non-regulated/not in business) are participating in the BMP program.

In 2017-2018, we took the following enforcement action on food handling facilities: 7 Notices of Violations and 3 Administrative Orders; and assessed \$175 in fines and \$366 in cost recovery.

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We did not conduct a FOG workshop for 2017-2018. We gave FOG BMP training onsite at 1 food handling establishments. During the reporting year, 40 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 66 MFV's plans. The vendors are inspected along with other food handling establishments included in the FOG program.

Advertising/ Outreach

This was the seventh year the P2 program received an advertising budget of approximately \$39,500, 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
- Distributing Fat Trappers, can toppers, brochures and flyers
- Promoting our Drug Take Back events (2/year)

Other public education events include: FOG information at all Stormwater Quality public education events, Earth Day, Home and Garden Show, Mobile City Hall, booth at Enviro Expo/Guthrie Green for the National Community Planning Month.

D. 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 when updated 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 we now use the Lucity software to track FOG producing businesses as well as grease related SSOs (this is a work in progress).

II. City of Broken Arrow

Below is a brief summary of Pollution Prevention (P2) activities of the City of Broken Arrow. The information contained herein covers the Oct. 1 2017-September 30 2018. The City of Broken Arrow maintains one part-time employee for pollution prevention.

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- City of Broken Arrow conducts commercial inspections 3 days per week. Food handling establishments are inspected twice per year and the automotive shops and car washes once per year. The inspector checks grease/sand interceptors and oil/water separators for proper maintenance, looks at maintenance manifests, speaks with management about best management practices, and inspects waste oil recycle areas.
- Broken Arrow ME'T Recycle Center yearly totals: Antifreeze recycled = 860 gal; Cooking oil recycled = 998 gal; Motor oil recycled = 8,450 gal
- City of Broken Arrow cooking oil recycle station (located @ Reasor's) yearly total = 626 gal
- City 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 35 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. The 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, coming in 18th out of more than 1000 cities in our population category.

This concludes the report summary; the complete report is attached. Thank you for your continued support. If you have any questions, please contact me at (918) 259-7000 ext. 7220 or lwilson@brokenarrowok.gov.

Sincerely,



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

cc: R. Louis Reynolds, 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
Charles Vokes, Utilities Director, City of Broken Arrow
Clayton Edwards, Water and Sewer Department Director, City of Tulsa
Bren Summerlin, Pretreatment Manger, City of Tulsa

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, 2017 to September 30, 2018

**RMUA
INDUSTRIAL PRETREATMENT PROGRAM
ANNUAL REPORT**

CERTIFICATION STATEMENT

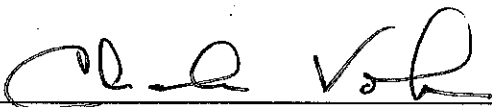
"I hereby certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who 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, 2017 to Sep. 30, 2018
Report Date

Charles Vokes, City of Broken Arrow
Name of Responsible Official

Utilities Director
Title


Signature

**RMUA
INDUSTRIAL PRETREATMENT PROGRAM
ANNUAL REPORT**

CERTIFICATION STATEMENT

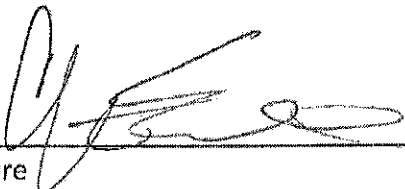
"I hereby certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who 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, 2017 to Sep. 30, 2018
Report Date

CLAYTON EDWARDS
Name of Responsible Official (Tulsa)

DIRECTOR
Title


Signature

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: 10/1/2017

End Date: 9/30/2018

Reporting Period

II. Significant Industrial User Compliance

Record the Number of SIU Who:		SIGNIFICANT INDUSTRIAL USERS	
		Categorical	Non-categorical
1.	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>5</u>
	b. Were Required to Submit Self-Monitoring Reports	<u>2</u>	<u>5</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>1</u>
Additional Information:			
6.	Total Number of SIU	<u>2</u>	<u>5</u>
7.	Rate of SNC for <u>all</u> SIU (categorical & non-categorical)	<u>14.3</u>	<u>%</u>

PRETREATMENT PERFORMANCE SUMMARY (PPS)

Page 2 of 2

III. Compliance Monitoring Program

Record the Number of:		SIGNIFICANT INDUSTRIAL USERS	
		Categorical	Non-categorical
I.	a. Issued Control Documents	<u>0</u>	<u>2</u>
	b. Required Control Documents	<u>0</u>	<u>2</u>
2.	a. Facilities Inspected	<u>2</u>	<u>5</u>
	b. Inspections Conducted	<u>2</u>	<u>10</u>
3.	a. Facilities Sampled	<u>2</u>	<u>5</u>
	b. Samplings Conducted	<u>10</u>	<u>77</u>

IV. Enforcement Actions

Record the Number of:		SIGNIFICANT INDUSTRIAL USERS	
		Categorical	Non-categorical
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>0</u>	<u>3</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>1</u>
7.	SIU that were Assessed Penalties	<u>0</u>	<u>2</u>
8.	Dollars of Penalties Collected	<u>\$0</u>	<u>\$25,785.72</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 (SIU) NAME AND ADDRESS	SIC CODE	CATEGORICAL/ NONCATEGORICAL	CONTROL DOCUMENT		ADDED/ DELETED (A, D, N/A)	NUMBER of TIMES SAMPLED		NUMBER of TIMES INSPECTED	COMPLIANCE STATUS (C, NC, SNC, N/A)			EFFLUENT LIMITS	
			Y/N	Last Action		City	SIU		BMR	REPORTS			Self- Monitoring
										90-Day Compliance			
Hillcrest Hospital South 8801 South 101 st East Ave. TUL	8062	Non Categorical	Yes	06/03/15	N/A	6	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	2	1	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	3	2	2	N/A	N/A	NC	C	
Broken Arrow Powder Coating (location 2) 2051 W. SW. Expressway Dr. BA	3479	Categorical	Yes	01/01/17	N/A	1	4	1	N/A	N/A	C	C	
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	
Communication Graphics/Comgraphix 1765 N. Juniper Ave. BA	2759	Non Categorical	Yes	02/01/18	A	1	9	3	N/A	N/A	C	SNC	

SECTION 3

NON-COMPLIANT INDUSTRIAL USERS

NONCOMPLIANT USERS Enforcement Actions Taken

[illegible]

Additional Notes:



**Water and Sewer Department
Water Quality Assurance**

7011 3500 0003 1077 3947

October 10, 2018

Southwestern Regional Medical Center
Attention: Karl Berens
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. Berens:

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 complete 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 semi-annual compliance report is the last day of the months of February and August. However, the compliance report due August 31, 2018, was not received in this office in a completed form until October 5, 2018.

Report Incomplete or Needing Correction				
Report			Number of Days Late	Failure Rate
Submitted	Due Date	Complete Date		
6/1/2018	8/31/2018	10/5/2018	35	3rd time in the last 2 years

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

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

- The assessment of a **fine of \$250.00.**

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

Proper payment totaling **\$250.00 (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

Failure to comply with this notice, as well as continued violations, may result in some combination of the following 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 to the address listed above 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 / address below:

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

Please contact Robert Doughty at (918) 591-4383 or Bren Summerlin at (918) 591-4393, if you have any questions or concerns.

Sincerely,



Jo Brown, Manager
Water Quality Assurance

ec: Clayton Edwards, Director, Water and Sewer Dept.
cc: Enforcement File

ENFORCEMENT RESPONSE ACTION

Do Not Mail – For File Use Only

INDUSTRY	Southwestern Regional Medical Center				FACILITY ID	5975	MONITORING LOCATION	FAC	
DATES OF VIOLATIONS					NATURE OF VIOLATIONS				
Submitted		Due Date		Completed	Report incomplete or needing correction				
6/1/2018		8/31/2018		10/5/2018					
VIOLATIONS THAT HAVE OCCURRED 9/1/2016 to 8/31/2018								NUMBER OF VIOLATIONS	2
DATE		VIOLATION							
8/31/2017		Report incomplete or needing correction; 2nd report in 2 years							
3/15/2017		Report Incomplete or Needing Correction; Received 11/15/2016, Completed 3/15/2017, due 2/28/2017; 1st report in 2 years @ 15 days late = phone call/e-mail.							
INDUSTRY'S COMPLIANCE STATUS (last quarter):					COMPLIANT				
INDUSTRY EXHIBITING GOOD FAITH EFFORT? (Explain below)					NO				
They have been permitted for several years and are well aware of their permit requirements.									
					Fine ↓		Cost Rec. ↓		
ENFORCEMENT RESPONSE PLAN ACTION:					NOV - w/ calculated fine		\$250.00 + \$0.00		
ENFORCEMENT RESPONSE PLAN TAKEN					NOV - w/ calculated fine		\$250.00 + \$0.00		
COMMENTS:	3rd report incomplete or needing correction in the last 2 years @ 31-60 days late = \$250 fine per the ERG						\$250.00		
ACTION TAKEN BY:		ROBERT DOUGHTY				DATE	10/9/2018		

SECTION 4

SIGNIFICANTLY NON-COMPLIANT INDUSTRIAL USERS

Enforcement Actions Taken

[illegible]

Additional Notes:

	1/26/2018		2/14/2018		3/15/2018		3/27/2018		4/20/2018			
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	Result 5 (mg/L)	Daily TRC 5	Monthly Average	Monthly Avg TRC
Acetic	0.005	0.005							0.00515	0.00515	0.005	0.005
Cadmium	0.001	0.001							0.001	0.001	0.001	0.001
Chromium	0.0171	0.171							0.01	0.01	0.0171	0.0171
Copper	0.331	0.331							0.0854	0.0854	0.331	0.331
Cyanide	0.006	0.006							0.0126	0.0126	0.006	0.006
Lead	0.0119	0.119							0.005	0.005	0.0119	0.0119
Molybdenum	0.01	0.01							0.01	0.01	0.01	0.01
Mercury	0.00005	0.0005							0.00005	0.00005	0.00005	0.00005
Nickel	0.0148	0.0148							0.01	0.01	0.0148	0.0148
Selenium	0.005	0.005							0.00894	0.00894	0.005	0.005
Silver	4.7	4.7	1.65	1.65	0.987	0.987	0.799	0.799	0.89	0.89	2.034	2.034
Zinc	0.853	0.853							0.0595	0.0695	0.853	0.853

Results above daily TRC limit = 100%

CITY OF BROKEN ARROW



Reviewed By

SEP 12 2018

LW

RECEIVED
9-12-18UTILITIES DEPARTMENT /
PRETREATMENT OFFICE

24-HOUR NOTIFICATION FOR PERMIT EXCURSIONS

TO:	FROM:
Industrial Pretreatment Coordinator	Jeff Brunner
COMPANY:	DATE:
City of Broken Arrow/Lynn Lane WWTP	9/12/2018
FAX NUMBER:	TOTAL NO. OF PAGES INCLUDING COVER:
	1
EMAIL:	SENDER'S PERMIT NUMBER:
lwilson@brokenarrowok.gov	BA 027
RE:	
Permit Excursion	

☒ URGENT ☐ FOR REVIEW ☐ PLEASE COMMENT ☐ PLEASE REPLY ☐ PLEASE RECYCLE

NOTES/COMMENTS:

Description of event: High silver content from Silver recovery unit

Duration of event: Mid-month non-mandatory evaluation test

Date/Time of event: 9/11/2018 11:45am Received Report LW

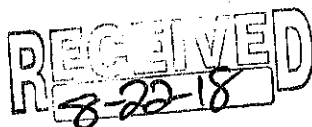
Impact on compliance: Non-Compliant

Suspected Cause: Unknown

Prevention: Had tested to determine the effectiveness of silver recovery system.

Sample Collection 9-4-18 JW

CITY OF BROKEN ARROW



Reviewed By
AUG 22 2018 *LW*

UTILITIES DEPARTMENT/
PRETREATMENT OFFICE

24-HOUR NOTIFICATION FOR PERMIT EXCURSIONS

TO:	Industrial Pretreatment Coordinator	FROM:	Jeff Brunner
COMPANY:	City of Broken Arrow/Lynn Lane WWTP	DATE:	8/22/2018
FAX NUMBER:	TOTAL NO. OF PAGES INCLUDING COVER: 1		
EMAIL:	lwilson@brokenarrowok.gov	SENDER'S PERMIT NUMBER:	BA 027
RE:	Permit Excursion		

☒ URGENT ☐ FOR REVIEW ☐ PLEASE COMMENT ☐ PLEASE REPLY ☐ PLEASE RECYCLE

NOTES/COMMENTS:

Description of event: High silver content from Silver recovery unit

Duration of event: monthly test result

Date/Time of event: 8/10/2018 11:45am

Impact on compliance: Non-Compliant

Suspected Cause: Unknown

Prevention: Having retested with a different testing company to determine if proper testing methods were used.

CITY OF BROKEN ARROW



Reviewed By *lw*
JUN 25 2018

UTILITIES DEPARTMENT /
PRETREATMENT OFFICE

24-HOUR NOTIFICATION FOR PERMIT EXCURSIONS

TO:	FROM:
Industrial Pretreatment Coordinator	Jeff Brunner – Communication Graphics Inc.
COMPANY:	DATE:
City of Broken Arrow/Lynn Lane WWTP	06/25/2018
FAX NUMBER:	TOTAL NO. OF PAGES INCLUDING COVER:
	1
EMAIL:	SENDER'S PERMIT NUMBER:
lwilson@brokenarrowok.gov	BA 027
RE:	
Permit Excursion	

☒ URGENT ☐ FOR REVIEW ☐ PLEASE COMMENT ☐ PLEASE REPLY ☐ PLEASE RECYCLE

NOTES/COMMENTS:

Description of event: - Excess silver discharge

Duration of event: - Last monthly test period

Date/Time of event: - 6/15/2018

Impact on compliance: out of compliance

Suspected Cause: Unknown

Prevention: Working with chemical providers to determine what may be the source of it.

Reviewed By
MAY 03 2018 *LW*

CITY OF BROKEN ARROW



RECEIVED
5-3-18

UTILITIES DEPARTMENT /
PRETREATMENT OFFICE

24-HOUR NOTIFICATION FOR PERMIT EXCURSIONS

TO:	FROM:
Industrial Pretreatment Coordinator	
COMPANY:	DATE:
City of Broken Arrow/Lynn Lane WWTP	05/03/2018
FAX NUMBER:	TOTAL NO. OF PAGES INCLUDING COVER:
	1
EMAIL:	SENDER'S PERMIT NUMBER:
lwilson@brokenarrowok.gov	BA 027
RE:	
Permit Excursion	

☒ URGENT ☐ FOR REVIEW ☐ PLEASE COMMENT ☐ PLEASE REPLY ☐ PLEASE RECYCLE

NOTES/COMMENTS:

Description of event: - Minor excess silver in wastewater discharge

Duration of event: Recent monitoring test

Date/Time of event: 5/2/2018

Impact on compliance: minor

Suspected Cause: Solid waste separation tank (grease trap) has had silver embedded in walls and is leaching small amount into system. We have had 0 silver from recovery system sent into wastewater drain in the past 2 months.

Prevention:

We have had drains power washed to remove embedded sediment and had trap pumped to remove particulates from the power wash procedure. Silvery recovery system will remain isolated from main drain system.

CITY OF BROKEN ARROW

Reviewed By *lw*
FEB 02 2018



RECEIVED
2-2-18

UTILITIES DEPARTMENT /
PRETREATMENT OFFICE

24-HOUR NOTIFICATION FOR PERMIT EXCURSIONS

TO:	Industrial Pretreatment Coordinator	FROM:	Jeff Brunner
COMPANY:	City of Broken Arrow/Lynn Lane WWTP	DATE:	02-02-2018
FAX NUMBER:		TOTAL NO. OF PAGES INCLUDING COVER:	1
EMAIL:	lwilson@brokenarrowok.gov	SENDER'S PERMIT NUMBER:	BA 027
RE:	Permit Excursion		

☒ URGENT ☐ FOR REVIEW ☐ PLEASE COMMENT ☐ PLEASE REPLY ☐ PLEASE RECYCLE

NOTES/COMMENTS:

Description of event: - Excess silver discharge

Duration of event: - First Monitoring Test

Date/Time of event: - 02-02-2018 2:06pm

Impact on compliance:

Suspected Cause: Silver recovery system is not appropriately sized

Prevention:

Contacted Oklahoma Industrial Silver Inc. to have a sufficient recovery system installed. They will come out the week of 2-5-2018 and replace the system with a larger recovery system to prevent future excursions.



Reviewed By

MAY 21 2018

Monday, May 14, 2018

Jeff Brunner
Maintenance Manager
Comgraphx
1765 N. Juniper
Broken Arrow, OK 74012

RECEIVED
MAY 21 2018

Re: NOTICE OF VIOLATION OF CITY OF BROKEN ARROW WASTEWATER DISCHARGE PERMIT # BA 027

Dear Mr. Brunner,

Enclosed is a notice of violation (NOV) of Wastewater Discharge Permit # BA 027 for the Comgraphx facility located at 1765 N. Juniper. The quarterly compliance monitoring report that was received by Comgraphx and submitted to the Broken Arrow Pretreatment Office on May 2, 2018 revealed a silver result of 0.89 mg/L for the sample taken on April 19, 2018. The requirement for 24-hour notification was fulfilled and a form submitted to my office on May 3, 2018 listing silver accumulation in the solid waste separation unit as the cause of the violation. A \$50 fine is required by the City of Broken Arrow Pretreatment Program Enforcement Response Plan. This fine is hereby waived because of the good faith efforts Comgraphx displaying in resolving non-compliance.

There is currently no discharge from the silver recovery unit, so a retest was taken in the screen room for silver on 5/4/18 to determine where the excess silver originated. The sample that was performed revealed a silver result of 0.0118 mg/L. Please note that all future samples from this location must be 24-hour composite samples in order to be used for compliance purposes. As discussed, please continue to sample from this location for regular permit sampling until discharge has resumed from the silver recovery unit. You indicated to me that you were seeking advice on how to remove any built-up silver from the solid waste separation unit. Please keep me updated on the status of this project. Comgraphx is hereby required to sample monthly from the screen room until compliance can be determined.

Please sign the notice of violation and return it to the Pretreatment Office at the address listed below within 5 days. 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
485 N. Poplar Ave.
Broken Arrow, OK 74012
(918) 259-7000 Ext. 7220
lwilson@brokenarrowok.gov

cc: Kenny Schwab, Assistant City Manager of Operations, City of Broken Arrow

Reviewed By *LW*
MAY 21 2018



BROKEN ARROW

Utilities Department
Industrial Pretreatment Program
Notice of Violation

RECEIVED
5-21-18

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: Comgraphx

Address of Discharge: 1765 N. Juniper

Permit#: BA 027 Date Notice Issued: 5/14/18

Control Authority Issuing Representative: THE CITY OF BROKEN ARROW

Date Violation occurred	In violation of	Nature of violation	Fine
4/19/18	Wastewater Discharge Permit # BA 027	Silver reported at 0.89 mg/L, which is over the daily limit of 0.5 mg/L	0.78 times over the limit. Requires \$50 fine per City of Broken Arrow Pretreatment Enforcement Response Plan. Fine is waived for good-faith efforts.

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

Receipt of Notice Acknowledged by Discharger:

JEFFREY J. BEUMER
*Authorized Signatory for Industrial Discharger (Print)

MAINTENANCE/SAFETY MGR
Title

5-17-2018
Date

[Signature]
Signature

Kenneth D. Schwab
Kenny Schwab, Assistant City Manager of Operations

05-15-18
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.

CITY OF
BROKEN ARROW

Where opportunity lives



Thursday, March 8, 2018

Jeff Brunner
Maintenance Manager
Comgraphx
1765 N. Juniper
Broken Arrow, OK 74012

Re: NOTICE OF VIOLATION OF CITY OF BROKEN ARROW WASTEWATER DISCHARGE PERMIT # BA 027

Dear Mr. Brunner,

Enclosed is a notice of violation (NOV) of Wastewater Discharge Permit # BA 027 for the Comgraphx facility located at 1765 N. Juniper. The quarterly compliance monitoring report that was submitted to the Broken Arrow Pretreatment Office revealed a silver result of 4.70 mg/L for the sample taken on January 26, 2018. You fulfilled the requirement of notifying the City within 24 hours by submitting written notification on February 2, 2018. Your written notification listed an inappropriately sized silver recovery system as the cause of the violation. On February 6, 2018, you notified me in writing that the silver recovery system had been upsized and indicated that you would like to operate the system for a week before sampling again. On February 14, 2018, another sample was analyzed that revealed a silver result of 1.65 mg/L which is also a violation of Permit #BA 027. On February 22, you notified me by telephone that the silver recovery system had once again been upsized.

Because the two silver analyses have exceeded the EPA's technical review criteria of: (permit limit x 1.2) you will need to perform additional monitoring for silver to ensure that Comgraphx is not "Significantly Non-Compliant" and therefore required to be published as such in the Tulsa World. I have attached documentation that describes the process of calculating significant non-compliance for your review. Please analyze sample location 001 five additional times in March to ensure compliance. If the silver recovery unit that you have in place at this time is adequate, and brings the silver result below the permitted limit, which is 0.5 mg/L, taking five 24-hour composite samples will bring the technical review criteria violations to 28% which is below the 33% criteria. Please prepare a monitoring report for the additional laboratory analyses.

Also attached is 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. 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
485 N. Poplar Ave.
Broken Arrow, OK 74012
(918) 259-7000 Ext. 7220
lwilson@brokenarrowok.gov

cc: Anthony Daniel, Director of Utilities, City of 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: Comgraphx

Address of Discharge: 1765 N. Juniper

Permit#: BA 027 Date Notice Issued: 3/8/18

Control Authority Issuing Representative: THE CITY OF BROKEN ARROW

Date Violation occurred	In violation of	Nature of violation	Fine
1/26/18	Wastewater Discharge Permit # BA 027	Silver reported at 4.70 mg/L, which is over the daily limit of 0.5 mg/L	8.4 times over the limit is a TRC violation, does not require a fine per City of Broken Arrow Pretreatment Enforcement Response Plan. Notice of Violation required.
2/14/18	Wastewater Discharge Permit # BA 027	Silver reported at 1.65 mg/L, which is over the daily limit of 0.5 mg/L	2.3 times over the limit is a TRC violation. It 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:

Jeffrey J Brunner

*Authorized Signatory for Industrial Discharger (Print)

Safety and Maintenance Manager

Title

5/8/2018

Date

Signature

Jeffrey J Brunner

3-9-18

Date

Anthony Daniel
Anthony Daniel, Utilities Director

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: Comgraphx

Address of Discharger: 1765 N. Juniper, Broken Arrow, OK 74012

Permit#: BA 027

Date Occurred	Nature of Violation	Suspected Cause	Corrective Measure(s)	Date of Abatement	Measure(s) to Prevent Recurrence
1/26/18	Silver above the daily, monthly, and Technical Review Criteria (TRC) limit				
2/14/18	Silver above the daily, monthly, and Technical Review Criteria (TRC) limit				

(Attach additional pages if necessary)

Jeffrey J Brunner
Authorized Signatory for Industrial Discharger (Print)
Safety and Maintenance Manager

Jeffrey J Brunner
Signature
5/8/2018
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.

SECTION 5

NEWSPAPER PUBLICATION OF SIGNIFICANTLY NON-COMPLIANT INDUSTRIAL USERS

PUBLIC NOTICE OF SIGNIFICANTLY VIOLATING INDUSTRIAL USERS

Haikey Creek Sanitary Sewer Service Area

Federal laws 40CFR, Part 25 and Part 403.8(f)(2)(viii) require that a municipality designated as a control authority publish an annual list all industrial users of the public sanitary sewer system who significantly violated any Federal, State or local pretreatment standard during the previous twelve (12) month period.

Therefore, the City of Broken Arrow is required to publish the following list of Industrial users who have been determined to be significant violators as defined by 40CFR, Part 403.8(f)(2)(viii):

October 2017 - September 2018

Comgraphx/Communication Graphics

TULSA WORLD

P.O. Box 1770 Tulsa, Oklahoma 74102-1770 | tulsaworld.com

Account Number

1070302

CITY OF BROKEN ARROW
Attn: LAUREN WILSON
PO BOX 610
BROKEN ARROW, OK 74012

Date

October 11, 2018

Date	Category	Description	Ad Size	Total Cost
10/11/2018	Legal Notices	HAIKEY CREEK SANITARY SEWER SVC AREA	1 x 39.00 CL	24.96

Affidavit of Publication

516874
Published in the Tulsa
World, Tulsa County,
Oklahoma, October 11,
2018

PUBLIC NOTICE OF SIGNIFICANTLY VIOLATING INDUSTRIAL USERS

Haikey Creek Sanitary Sewer
Service Area

Federal laws 40CFR, Part 25 and Part 403.8(f)(2)(viii) require that a municipality designated as a control authority publish an annual list all industrial users of the public sanitary sewer system who significantly violated any Federal, State or local pretreatment standard during the previous twelve (12) month period. Therefore, the City of Broken Arrow is required to publish the following list of industrial users who have been determined to be significant violators as defined by 40CFR, Part 403.8(f)(2)(viii):

October 2017 - September
2018

Comgraphix/Communication
Graphics

I, Melissa Marshall, of lawful age, am a legal representative of the Tulsa World of Tulsa, Oklahoma, a daily newspaper of general circulation in Tulsa County, Oklahoma, a legal newspaper qualified to publish legal notices, as defined in 25 O.S. § 106 as amended, and thereafter, and complies with all other requirements of the laws of Oklahoma with reference to legal publication. That said notice, a true copy of which is attached hereto, was published in the regular edition of said newspaper during the period and time of publication and not in a supplement, on the DATE(S) LISTED BELOW

10/11/2018

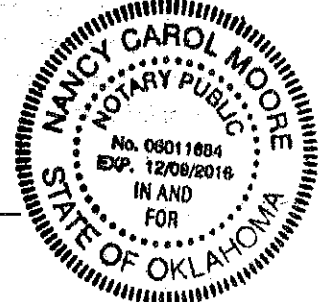
Newspaper reference: 0000516874

M. Marshall
Legal Representative

Sworn to and subscribed before me this date: 10-11-2018

Nancy Carol Moore
Notary Public

My Commission expires 12-08-2018



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, 2017 through September 30, 2018.

SECTION 7

HAIKEY CREEK WASTEWATER TREATMENT PLANT

WATER QUALITY BASED EFFLUENT CONCENTRATIONS

POTW MONITORING RESULTS SUMMARY TABLE
 October 1, 2017 to September 30, 2018
 Regional Metropolitan Utility Authority - Hailey Creek Wastewater Treatment Plant

TABLE III: METALS CYANIDE PHENOOLS + Molybdenum	MQL (mg/l)	MDL Used (mg/l)	INFLUENT (mg/l)						EFFLUENT (mg/l)						OKLIMIT (mg/l)	MAHL (TBL) LB/DAY	HEADWORK LOADING FOR THE REPORTING PERIOD LB/DAY						% of MAHL		
			Sample Dates						Sample Dates								Sample Dates								
			11/14/17	2/27/18	5/30/18	8/21/18	11/15/17	2/28/18	5/31/18	8/22/18															
			11/14/17	2/27/18	5/30/18	8/21/18	11/15/17	2/28/18	5/31/18	8/22/18															
Flow, mgd			11.16	10.60	11.58	11.27	9.28	9.35	10.28	10.92															
Antimony	0.06	0.01	< 0.01	< 0.01	< 0.01	< 0.010	< 0.01	< 0.01	< 0.01	< 0.01															
Arsenic	0.0005	0.0005	< 0.0005	< 0.0005	< 0.0005	0.0013	< 0.0005	< 0.0005	< 0.0005	0.00086															
Beryllium	0.005	0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005															
Cadmium	0.001	0.001	< 0.001	< 0.0010	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001															
Chromium	0.01	0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01															
Copper	0.001	0.001	0.074	0.047	0.076	0.074	0.060	< 0.0010	0.133	0.0052															
Lead	0.0005	0.0001	< 0.0005	< 0.0005	< 0.0005	0.002	< 0.0005	< 0.0005	0.0015	0.00023															
Mercury	0.00005	0.00005	#####	< 0.0000500	< 0.0000500	< 0.0000500	< 0.00005	< 0.0000500	0.0000961	< 0.0000500															
Molybdenum	0.03	0.01	< 0.010	< 0.0100	< 0.01	< 0.01	< 0.010	< 0.0100	< 0.01	< 0.01															
Nickel	0.01	0.005	< 0.005	< 0.005	0.00508	0.00502	< 0.005	< 0.005	0.0176	< 0.005															
Selenium	0.005	0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005															
Silver	0.0005	0.0005	< 0.0005	< 0.0005	< 0.0005	< 0.0005	< 0.0005	< 0.0005	0.0005	< 0.0005															
Thallium	0.0005	0.0001	< 0.0005	< 0.0005	< 0.0005	< 0.0001	< 0.0005	< 0.0005	< 0.0001	< 0.0001															
Zinc	0.02	0.01	0.104	0.0523	0.1	0.102	0.0471	0.0398	0.208	0.0302															
Sample Dates			11/14/17	2/27/18	5/30/18	8/21/18	11/15/17	2/28/18	5/31/18	8/22/18															
Flow, mgd			11.16	10.60	11.58	11.27	9.28	9.35	10.28	10.92															
Cyanide	0.01	0.006	< 0.006	< 0.006	0.0224	< 0.01000	< 0.006	< 0.006	0.0258	0.0572															
Total Phenolics	N/A	0.03	0.191	0.057	0.0704	0.056	< 0.025	< 0.025	< 0.025	< 0.025															
OTHER POLLUTANTS DETECTED (TABLE II, VI, & V)	MQL (mg/l)	MDL (mg/l)	INFLUENT (mg/l)						EFFLUENT (mg/l)						OKLIMIT (µg/l)	MAHL (TBL) LB/DAY	HEADWORK LOADING FOR THE REPORTING PERIOD, LB/DAY						% of MAHL		
			Sample Dates						Sample Dates								Sample Dates								
			11/14/17	2/27/18	5/30/18	8/21/18	11/15/17	2/28/18	5/31/18	8/22/17															
			11/14/17	2/27/18	5/30/18	8/21/17																			
Oil & Grease	N/A	N/A	19.6	9.2	25																				
Chloride																									
Sulfide																									
Ammonia																									
Total Phosphorus																									

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, VI, and V values that are 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.)

Regional Metropolitan Utility Authority

Technically Based Local Limits Development
Sampling Plan 2018

For: Haikey Creek Wastewater Treatment Plant
Facility ID S-20434
OPDES Permit OK0034363

Sampling Parameters

Toxic Pollutants

Antimony
Arsenic
Beryllium
Cadmium
Total Chromium
Hexavalent Chromium
Copper
Lead
Molybdenum
Nickel
Selenium
Silver
Thallium
Zinc
Mercury
Cyanide

Conventional Pollutants

BOD
TSS
Oil & Grease
Total Phosphorus
Ammonia
pH
Temperature

Manhole Selection

Industrial – Three manholes that intercept flow from industrial parks

Cedar Creek Park

Woodland Park

Greenway Business Park

Commercial – Two manholes that intercept commercial flow

Rose District

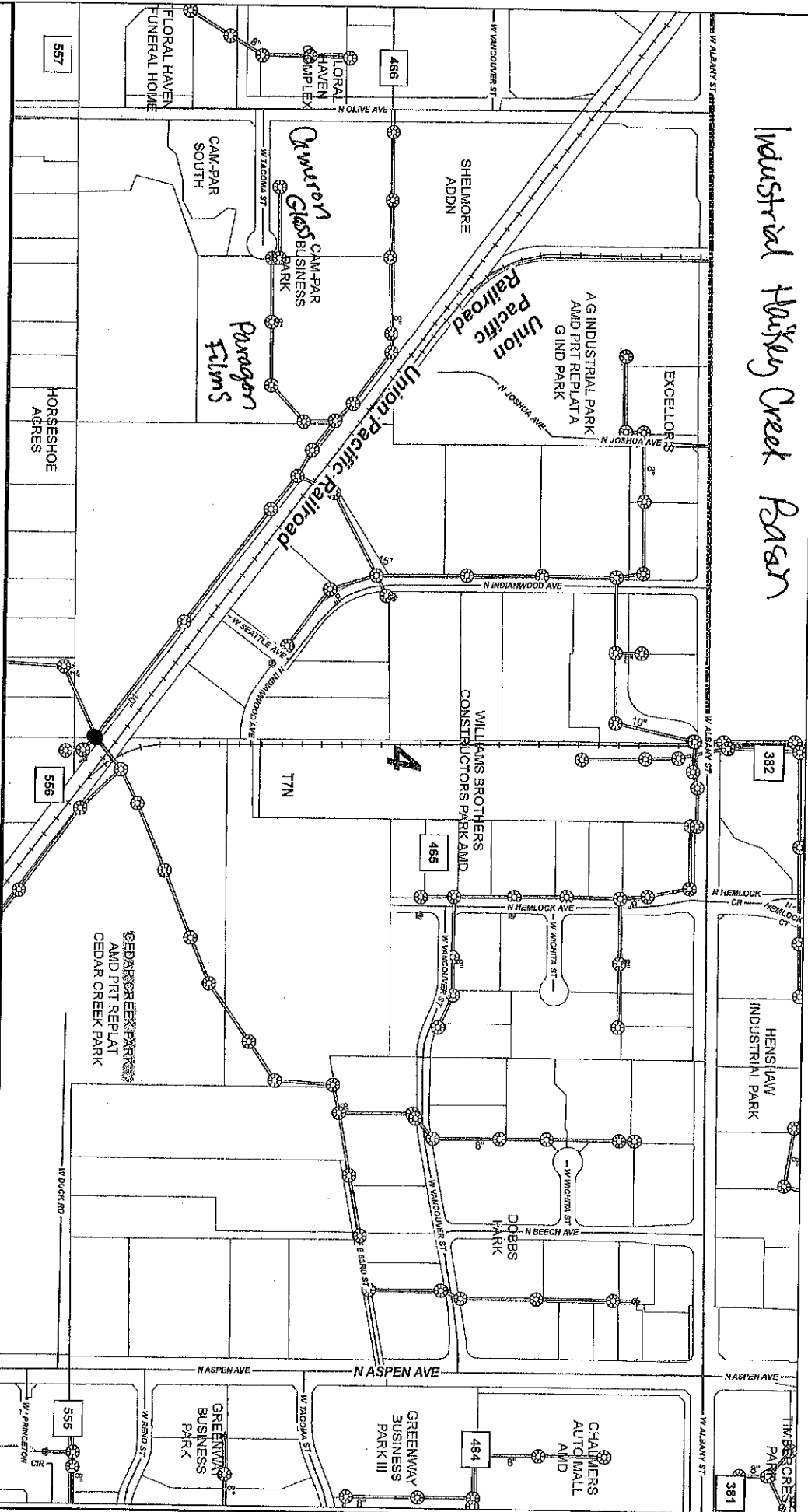
71st

Residential – One manhole that intercepts residential flow

Garnett

* Influent and Effluent Priority Pollutant Scans shall also be used in calculating technically based local limits.

Industrial Hasky Creek Basin



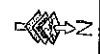
**CITY OF
BROKEN ARROW**
Where opportunity lives

N/2 Sec 4, T18N, R14E

**CITY OF BROKEN ARROW, OK
SANITARY SEWER ATLAS SHEET**

- Legend**
- Non-Stability Sewer Address
 - Structure Type
 - Flow Meter
 - Grease Separator
 - Lift Station
 - Split Manhole
 - Storage Tank
 - Sewer Clean Out
 - Sewer Manhole
 - Sewer Gravity Main

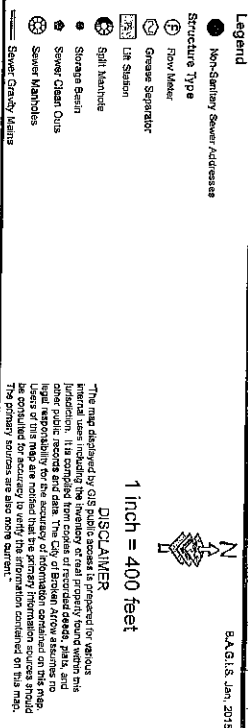
1 inch = 400 feet



DISCLAIMER
This map displayed by GIS public access is prepared for various purposes and is not intended to be used for legal or engineering purposes. It is compiled from various sources and the City of Broken Arrow assumes no liability for the accuracy of information contained on this map. The primary sources are also more current.

CITY OF BROKEN ARROW, OK
SANITARY SEWER ATLAS SHEET

N/2 Sec 10, T18N, R14E



1 inch = 400 feet

DISCLAIMER

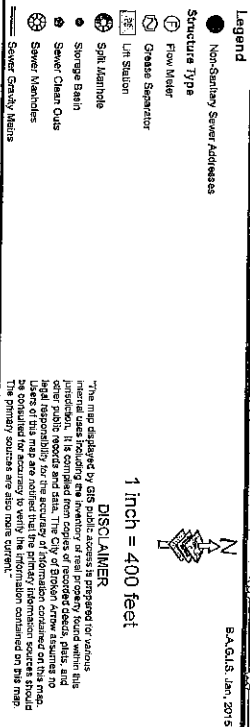
The map developed by GIS public access is prepared for various internal uses, including the inventory of real property found within this jurisdiction. It is compiled from various records, deeds, plats, and other public records and data. The City of Everett allows no legal responsibility for the accuracy of information contained on this map. Users of this map are notified that the primary information sources should be consulted for accuracy to verify the information contained on this map. The primary sources are also more current.



**CITY OF
BROKEN ARROW**
Where opportunity lives

N/2 Sec 3, T18N, R14E

CITY OF BROKEN ARROW, OK SANITARY SEWER ATLAS SHEET





**CITY OF
BROKEN ARROW**
Where opportunity lives

S/2 Sec 11, T18N, R14E

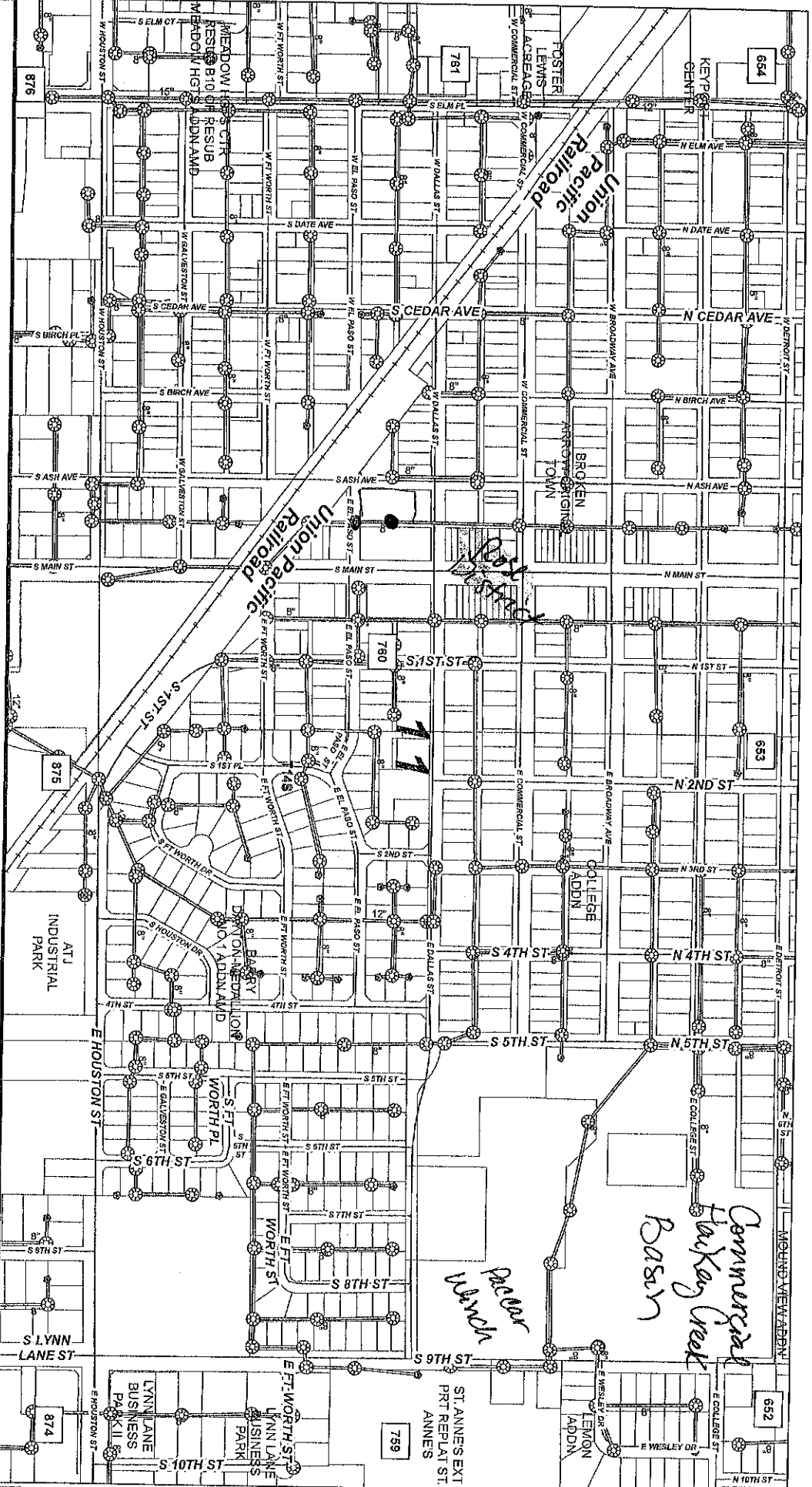
CITY OF BROKEN ARROW, OK SANITARY SEWER ATLAS SHEET

- Legend**
- Sanitary Sewer Address
 - Structure Type
 - Flow Meter
 - Grease Separator
 - Lift Station
 - Soft Membrane
 - Storage Basin
 - Sewer Clean Out
 - Sewer Manhole
 - Sewer Catchment

DISCLAIMER
This map is provided by GIS & Mapping Services for informational use only. It is not intended to be used for legal purposes. The City of Broken Arrow assumes no liability for any errors or omissions on this map. The primary source of information is the GIS & Mapping Services database.

1 inch = 400 feet

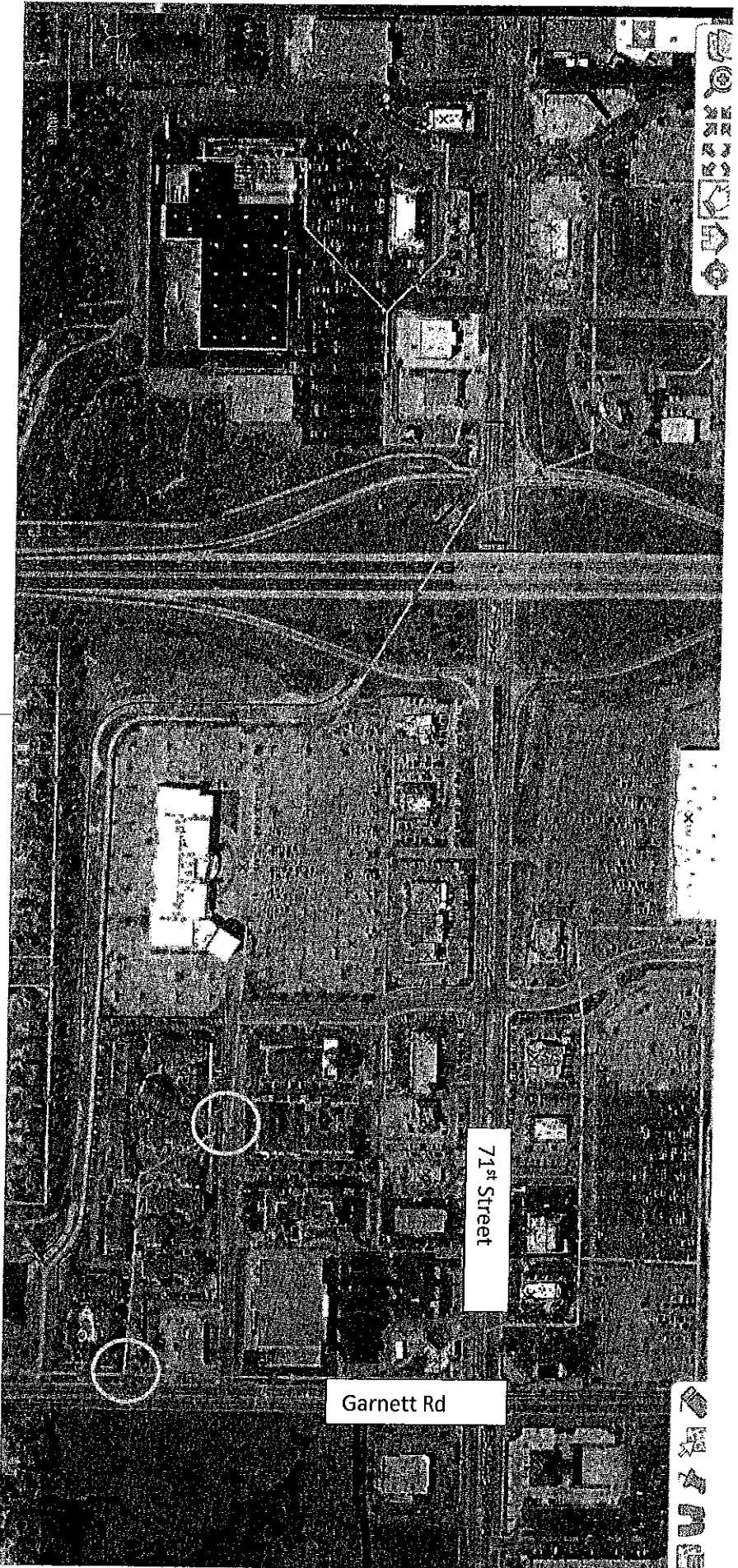
5/2/2015, Jan. 2015





Hawkey Creek Commercial 71st St.

This may work for all commercial Atlas page 657 Area 112 MH121



CO

Union
Pacific
Railroad

