



CITY OF
BROKEN ARROW

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Utilities Department
Post Office Box 610
Broken Arrow, Oklahoma 74013

To: R. Louis Reynolds, Chairman, Regional Metropolitan Utility Authority

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

Date: Tuesday, November 20, 2018

Subject: August to October 2018 RMUA Pretreatment Report

Dear Mr. Reynolds,

The following is a brief synopsis of the major activities of the Broken Arrow Industrial Pretreatment Program for the period of August to October 2018. This update regards pretreatment issues and industrial wastewater discharges pertaining to the R.M.U.A.'s Hailey Creek Wastewater Treatment Plant.

August 2018:

Fats, Oil & Grease (FOG) Program Activities

Food Handling Establishment Inspections:

- City of Broken Arrow Pretreatment staff performed 44 food handling establishment inspections in the month of August. 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.

Industrial Pretreatment Activities:

Compliance reports and laboratory analysis:

- Unifirst – The monthly 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 \$2,788.79 and submitted to the Broken Arrow Finance Department.
- Broken Arrow Powder Coating – Broken Arrow pretreatment staff inspected Broken Arrow Powder Coating and performed wastewater monitoring in August. City staff use automatic sampling equipment to perform 24-hour composite samples per EPA regulation. Once samples are

collected they are transported to a state certified laboratory for analysis. The laboratory analysis came back with no deficiencies. A bill was issued to Broken Arrow Powder Coating, by the Finance Department, for reimbursement of laboratory charges.

- The Annual EPA Region VI Pretreatment Workshop was in August in Oklahoma City. City of Tulsa and City of Broken Arrow Pretreatment Coordinators delivered presentations about starting a Fats, Oil & Grease Program.

September 2018:

Fats, Oil & Grease (FOG) Program Activities

Food Handling Establishment Inspections:

- City of Broken Arrow pretreatment staff performed 41 food handling establishment inspections in the month of September. 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.

Industrial Pretreatment Activities:

Compliance reports and laboratory analysis:

- Unifirst – The monthly 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 \$1,162.64 and submitted to the Broken Arrow Finance Department.

Federal and State Pretreatment regulations require City of Broken Arrow to perform a facility inspection and sample the process wastewater at least once per year at every facility with a wastewater discharge permit. Broken Arrow pretreatment staff inspected Unifirst and performed wastewater monitoring in September. Staff use automatic sampling equipment to perform 24-hour composite samples per EPA regulation. Once samples are collected they are transported to a state certified laboratory for analysis. The laboratory analysis came back with no deficiencies. A bill was issued to Unifirst, by the Broken Arrow Finance Department, for reimbursement of laboratory charges.

- Comgraphx– The monthly compliance self-monitoring and laboratory analysis reports were received and reviewed. No deficiencies were noted.

October 2018:

Fats, Oil & Grease (FOG) Program Activities

Food Handling Establishment Inspections:

- Broken Arrow Pretreatment staff performed 50 food handling establishment inspections in the month of October. 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.

Industrial Pretreatment Activities:

Compliance reports and laboratory analysis:

- Unifirst – The compliance self-monitoring and laboratory analysis reports were received and reviewed. No deficiencies were noted. Monthly surcharges for conventional pollutants above residential thresholds were calculated in the amount of \$995.62 and submitted to the Broken Arrow Finance Department for billing.
- Broken Arrow Powder Coating – The compliance self-monitoring and laboratory analysis reports were received and reviewed. No deficiencies were noted.
- CSI Aerospace – The compliance self-monitoring and laboratory analysis reports were received and reviewed. No deficiencies were noted.
- Comgraphx– The monthly compliance self-monitoring and laboratory analysis reports were received and reviewed. No deficiencies were noted.
- Technically Based Local Limits- Wastewater collection system laboratory analysis has commenced for calculation of technically based local limits for the Haikey Creek Wastewater Treatment Plant. Broken Arrow pretreatment staff chose manholes collecting flow from industrial parks, commercial, and residential properties. Selected manholes are being monitored for metals, biochemical oxygen demand, total suspended solids, oil& grease, ammonia, and phosphorus. The lab results will be used to calculate new wastewater discharge limits for industrial users within the Haikey Creek wastewater treatment system. The limits are to be submitted to DEQ by May 2019.

Annual Report to the Department of Environmental Quality (DEQ):

- A pretreatment program status report for Haikey Creek Wastewater Treatment Plant is required to be submitted to DEQ by October 31st each year. The report was prepared and submitted to DEQ by City of Broken Arrow pretreatment staff. There was one industrial user that was listed as significantly non-compliant during this pretreatment year. Comgraphx/Communication Graphics was published in the Tulsa World as being significantly non-compliant with pretreatment regulations, as required by DEQ. Comgraphx has since stopped discharging from the silver recovery system because treatment was not adequate to meet Broken Arrow pretreatment standards. The FY 2018 RMUA Annual Pretreatment Report to DEQ is attached for your review.

This concludes my report. Thank you for your continued support of the RMUA industrial pretreatment program. Should you have any questions or concerns please do not hesitate to contact me at the Broken Arrow Pretreatment Office.

Sincerely,

A handwritten signature in black ink that reads "Lauren Wilson". The script is fluid and cursive, with the first name "Lauren" and last name "Wilson" clearly distinguishable.

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