



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:** Monday, February 25, 2019

**Subject:** November 2018 to January 2019 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 November 2018 to January 2019. This update regards pretreatment issues and industrial wastewater discharges pertaining to the R.M.U.A.'s Haikey Creek Wastewater Treatment Plant.

**November 2018:**

**Broken Arrow Fats, Oil & Grease (FOG) Program Activities**

**Food Handling Establishment Inspections:**

- Pretreatment staff performed 12 food handling establishment inspections in the month of November. Staff reviewed manifests for grease interceptor maintenance, inspected the interceptors, and discussed best management practices with management. There were 4 establishments with interceptors that were improperly maintained or in need of repair that were given 15 days to correct the deficiency. In addition to the regular inspections, there were 8 re-checks done for non-compliance issues.

**Commercial Pretreatment System Inspections:**

- Pretreatment staff performed 28 auto shop inspections. Oil/water separators were inspected for proper maintenance and waste hauling manifests are checked to ensure proper waste disposal. There were 5 establishments with separators that were improperly maintained that were given 15 days to correct the deficiency.
- Pretreatment staff performed 1 car wash inspection. The oil/water separator and sand interceptor was inspected for proper maintenance and waste hauling manifests were checked to ensure proper waste disposal.

## **Pollution Prevention Awareness**

- Pretreatment staff mailed pollution prevention letters to 18 residents upstream of a sanitary sewer overflow reported by sewer collection crews as being caused by excessive grease in the sewer line. The letters explain how residents can keep oil, grease, and trash out of the sewer system to prevent sewer overflows and backups. The letters also direct residents to install backflow preventers for protection from sewer backups.

## **Broken Arrow Industrial Pretreatment Program Activities:**

### **Compliance reports and laboratory analysis:**

- Unifirst – The monthly compliance self-monitoring report and laboratory analyses were received and reviewed. No deficiencies were noted. Monthly surcharges for conventional pollutants above residential thresholds were calculated in the amount of \$525.23 and submitted to the Broken Arrow Finance Department.
- Comgraphx– The monthly compliance self-monitoring and laboratory analysis reports were received and reviewed for October and November. No deficiencies were noted. Monthly surcharges for conventional pollutants above residential thresholds were calculated in the amount of \$145.87 and submitted to the Finance Department for billing.

## **December 2018:**

## **Broken Arrow Fats, Oil & Grease (FOG) Program Activities**

### **Food Handling Establishment Inspections:**

- Pretreatment staff performed 15 food handling establishment inspections in the month of December. Staff reviewed manifests for grease interceptor maintenance, inspected the interceptors, and discussed best management practices with management. There were 10 establishments with interceptors that were improperly maintained or in need of repair that were given 15 days to correct the deficiency. In addition to the regular inspections, there were 11 facilities re-checked for non-compliance issues.

### **Commercial Pretreatment System Inspections**

- Pretreatment staff performed 5 auto shop inspections. Oil/water separators were inspected for proper maintenance and waste hauling manifests were checked to ensure proper waste disposal. There was 1 establishment with a separator that was improperly maintained that was given 15 days to correct the deficiency. In addition to the regular inspections, there were 6 facilities re-checked for non-compliance issues.

## **Broken Arrow Industrial Pretreatment Program 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.
- Haikey Creek Wastewater Treatment Plant – influent and effluent priority pollutant analysis were received and reviewed. No deficiencies were noted.

**January 2019:**

## **Broken Arrow Fats, Oil & Grease (FOG) Program Activities**

### **Food Handling Establishment Inspections:**

- Pretreatment staff performed 10 food handling establishment inspections in the month of January. Staff reviewed manifests for grease interceptor maintenance, inspected the interceptors, and discussed best management practices with management. There were 11 establishments with interceptors that were improperly maintained or in need of repair were given 15 days to correct the deficiency. In addition to the regular inspections, there were 11 re-checks done for non-compliance issues.

### **Commercial Pretreatment System Inspections**

- Pretreatment staff performed 27 auto shop inspections. Oil/water separators were inspected for proper maintenance and waste hauling manifests were checked to ensure proper waste disposal. There were 5 establishments with separators that were improperly maintained that were given 15 days to correct the deficiency. In addition to the regular inspections, there were 11 facilities re-checked for non-compliance issues.

### **Pollution Prevention Awareness**

- Pretreatment staff mailed 95 pollution prevention letters to residents upstream of a sanitary sewer overflows reported by sewer collection crews as being caused by excessive grease in the sewer line. The letters explain how residents can keep oil, grease, and trash out of the sewer system to prevent sewer overflows and backups. The letters also direct residents to install backflow preventers for protection from sewer backups.

## **Broken Arrow Industrial Pretreatment Program 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 \$1,531.86 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.

### **EPA Dental Facility Effluent Guidelines:**

- Broken Arrow Dental Facilities were mailed “One-time compliance reports” that are due to the City by July 14, 2020. The City of Broken Arrow is required by the Environmental Protection Agency (EPA) to collect the compliance reports and ensure compliance with 40 CFR 441. All existing facilities subject to the regulations must install an amalgam separator, implement best management practices for maintaining the separators, and certify such to the City of Broken Arrow by July 14, 2020. Any new dental facility must comply immediately.

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,

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