



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: Wednesday, May 29, 2019

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

February 2019:

Broken Arrow Fats, Rags, Oil & Grease (FROG) Program Activities

Food Handling Establishment Inspections:

- Pretreatment staff performed 85 routine food handling establishment inspections in the month of February. Staff reviewed manifests for grease interceptor maintenance, inspected the interceptors, and discussed best management practices with management. There were 20 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 routine inspections, there were 15 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 are checked to ensure proper waste disposal. In addition to the inspections, there were 5 facilities re-checked for non-compliance issues.

Pollution Prevention Awareness

- Pretreatment staff hosted a booth at the 2019 Broken Arrow Homeowner's Association Workshop to speak with residents and provide information about water conservation, water quality, and pollution prevention.

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 \$2,525.48 and submitted to the Broken Arrow Finance Department.
- Comgraphx– The monthly 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 \$32.95 and submitted to the Finance Department for billing.
- Kum & Go 8001 S. Garnett – A discharge request was submitted by environmental consultant, Seneca Company, to release underground storage tank "ground water" into the City of Broken Arrow sanitary sewer system. These requests are submitted with laboratory analysis for gasoline range organics, benzene, toluene, ethylbenzene, and xylene. The laboratory analysis showed no deficiencies. The request was approved and the ground water was discharged to an onsite manhole.

Pretreatment Program Administration

Roshini Schroeder, Municipal Pretreatment Coordinator with DEQ, performed the Annual Pretreatment Compliance Inspection for Regional Metropolitan Utility Authority at the Broken Arrow Pretreatment Office. DEQ mailed a report of the findings which is attached for your review. Components of the inspection are as follows:

- OPDES Permit Review - DEQ verified that permit analytical requirements were met for the previous pretreatment year, October 1, 2017 to September 30, 2018. Monitoring of the Haikey Creek Wastewater Treatment Plant influent and effluent for priority pollutants was performed correctly, at the proper intervals, and complied with permit limits.
- Approved Pretreatment Program Document – DEQ reviewed the document to verify that the ordinance was being enforced and that the approved procedures were properly implemented.
- Technically Based Local Limit Study (TBLL) - DEQ reviewed the document to verify that industrial wastewater discharge permit limits were applied correctly.
- Enforcement Response Plan – DEQ reviewed the document to verify that the plan was enforced.
- Haikey Creek Wastewater Treatment Plant - DEQ reviewed the annual report that was submitted by the City of Broken Arrow in October 2018 and did a file review to confirm details listed in the report. The Comgraphx file was audited.
- Pollution Prevention – DEQ inquired about programs and procedures for reducing sanitary sewer overflows. City of Broken Arrow's pollution prevention efforts included: Food Handling Establishment inspections/Best Management Practices, Car Wash facility inspections/Best Management Practices, Automotive Shop inspections/Best Management Practices, community involvement and public awareness efforts.

There were no findings of required actions or violations identified during the inspection. RMUA was commended for a well-operated and executed Industrial Pretreatment Program with proactive measures and scope including pollution prevention and education.

March 2019:

Broken Arrow Fats, Rags, Oil & Grease (FROG) Program Activities

Food Handling Establishment Inspections:

- Pretreatment staff performed 68 routine food handling establishment inspections in the month of March. 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 that were given 15 days to correct the deficiency. In addition to the regular inspections, there were 14 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 \$1,534.61 and submitted to the Broken Arrow Finance Department.
- Comgraphx - 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 \$84.09 and submitted to the Broken Arrow Finance Department.

Pretreatment Program Administration

Staff attended the quarterly Oklahoma DEQ Pretreatment Meeting in Muskogee. The following is an overview of the meeting:

- Dal-Tile Industry Tour
- Wipes, Dental Amalgam, and new pretreatment challenges
- Cannabis regulations in Wastewater
- Landfill Leachate and implications in wastewater
- Perfluoroalkyl substances, Hazardous Waste Pharmaceutical Rule, and other DEQ updates

April 2019:

Broken Arrow Fats, Rags, Oil & Grease (FROG) Program Activities

Food Handling Establishment Inspections:

- Pretreatment staff performed 76 routine 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. There were 18 establishments with interceptors that were improperly maintained or in need of repair were given 15 days to correct the deficiency. In addition to the routine inspections, there were 12 re-checks done for non-compliance issues.

Pollution Prevention Awareness

- Pretreatment staff hosted a water conservation/water quality booth at the Rose District Farmer's Market each Saturday in April. A rain barrel was given away each week to promote water-wise irrigation and encourage Broken Arrow residents to take the Mayor's Challenge for Water Conservation. Broken Arrow came in 12th place in the challenge, which was a friendly contest against cities from across the nation.
- Pretreatment staff distributed water conservation/water quality activity books to Kindergarten, First, and Second-grade students in Broken Arrow Public Schools, Union Public Schools, and Bixby Public Schools within Broken Arrow city limits.
- Pretreatment staff hosted a water conservation/water quality presentation for 2nd grade students at Country Lane Elementary School.

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 \$1,186.44 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.

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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