REGIONAL METROPOLITAN UTILITY AUTHORITY
****
175 E. 2ND Street 14-117 Tulsa, Oklahoma 74103

Tuesday, October 29, 2019

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

Re: FY 2019 Annual Pretreatment Program Report to DEQ
Regional Metropolitan Utility Autjority (RMUA)
Industrial Pretreatment Program for:
Haikey Creek Wastewater Treatment Plant
Oklahoma Pollutant Discharge Elimination System
(OPDES) Permit Number OK0034363

Dear Mrs. Schroeder:

The RMUA/Haikey Creek WWTP Industrial Pretreatment Program Annual Report for the period October 1, 2018 through September 30, 2019 is hereby submitted. Please note the following general comments in addition to the required forms:

Report of Changes to the Approved Pretreatment Program

No changes have been made to the Regional Metropolitan Utility Authority Industrial Pretreatment Program. Technically based local limits have been calculated and will be submitted as a separate attachment for your approval.

The City of Broken Arrow is in the process of revising the sewer use ordinance to update the following areas:

- Enforcement response plan for commercial users
- Revised technically based local limits for industrial users
- Waste hauler permitting
- Prohibitions on dental amalgam and hazardous pharmaceuticals.

A copy of the draft ordinance will be submitted to you as a substantial pretreatment program modification.

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.

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.

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 that were 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 2018 to September 2019 Pretreatment year one industrial user was published as significantly non-compliant (SNC), Comgraphx/Communication Graphics. A publication was made in the Tulsa World on October 25 listing Comgraphx/Communication Graphics as being a "Significantly Violating Industrial User." I have attached the affidavit of publication in Section 5 for your review. I have also attached the notice of violation that was issued by City of Broken Arrow in Section 4.

The control authority sample for Comgraphx came back with a silver violation at their oil water separator. Two subsequent samples have also come back with silver violations. Comgraphx has been collecting samples "end of process" from their screen room and when the City collected a sample from the oil water separator, a silver violation was discovered. Comgraphx has continued to perform monthly sampling from the screen room with no violations. Comgraphx indicated that the oil water separator may be leaching silver. They were directed, last year, to begin hauling wastewater from their silver recovery unit offsite and have had no flow going into the oil water separator from that process. The City of Broken Arrow is in the process of drafting a consent order for Comgraphx asking them to remove the oil water separator and come into permit compliance. I will forward you the details of that order as soon as it is complete.

During FY 2019, Unifirst was issued surcharges in the amount of $15,543.28 and Comgraphx was issued surcharges in the amount of $1,108.28 for biochemical oxygen demand (BOD), total suspended solids (TSS), and oil & grease results above residential thresholds per Broken Arrow Municipal Code Manual of Fees.

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

City of Broken Arrow mailed one-time compliance reports to dental dischargers in January. We will be visiting each facility before the July 2020 deadline to ensure compliance with 40 CFR 441.

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 2019:

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, 2018-September 30, 2019. The City of Tulsa P2 group maintains four full time employees.

- Tulsa MET Recycle Centers combined yearly totals: Antifreeze recycled = 550 gal; Cooking oil recycled = 1017 gal; Motor oil recycled = 5,715 gal
- Tulsa FOG BMP program staff performed surveys, office visits, and investigations. Tulsa's Partners for a Clean Environment, PACE, program provides website recognition, pledges and decals for display to FHEs who participate and are in good-standing with Tulsa BMP requirements.
- Tulsa FOG Workshop for FHE Employees was held.
- Tulsa Pretreatment staff require all mobile food vendors to have a wastewater disposal plan approved in order to receive their business license. The vendors are inspected yearly.
- Tulsa pretreatment staff attended Earth Day events, Environmental Expo, Sustainable Tulsa meeting, Cox Conserves Exposition Fair at the Cox headquarters.
- Tulsa pretreatment staff operate a pharmaceutical/medical disposal program, a dental mercury amalgam program, a silver BMP program and a radiator BMP program.

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, 2018-September 30, 2019. The City of Broken Arrow currently has one employee for the Pretreatment Programs.

The City of Broken Arrow places a high value on pollution prevention. Please read the following list of activities for FY 2019:

- City of Broken Arrow conducted 321 food handling establishment inspections and 66 automotive inspections during FY 2019. 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.
- City of Broken Arrow mails letters to residents upstream from sanitary sewer overflows that were caused by grease and "flushable" wipes. The letters encourage pollution prevention in the home by telling residents what items they should not put in a drain or flush. The letters also inform residents of the City's backflow preventer requirement.
- Broken Arrow MET Recycle Center Cooking oil recycled = 922 gal
- City Pretreatment staff participated in the 2019 Mayor's Challenge for Water Conservation which lasted the entire month of April. Broken Arrow's 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 hosted a booth at the Farmer's Market every Saturday in April where water conservation/water quality brochures and 4 rain barrels were given away. Water Conservation activity books were distributed to Broken Arrow, Bixby, and Union Elementary Students in the Broken Arrow City Limits. Staff also gave a presentation about water conservation to the 2nd grade students at Country Lane Elementary. 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 12th out of more than 1000 cities in our population category.

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

Sincerely,

Lauren Kimbrough

Lauren Kimbrough
Pretreatment Coordinator
City of Broken Arrow
On behalf of Regional Metropolitan Utility Authority
(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
Kenny Schwab, Assistant City Manager of Operations, City of Broken Arrow
Charles Vokes, Utilities Director, City of Broken Arrow
Stacy Thornton, Assistant Utilities Director, City of Broken Arrow
Clayton Edwards, Water and Sewer Department Director, City of Tulsa
Bren Summerlin, Pretreatment Manger, City of Tulsa

FY 2019 INDUSTRIAL PRETREATMENT PROGRAM ANNUAL REPORT TO:

Oklahoma Department of Environmental Quality
Water Quality Division
Enforcement Section

INDUSTRIAL PRETREATMENT PROGRAM FOR:

Regional Metropolitan Utility Authority
Haikey Creek Wastewater Treatment Plant
OPDES Permit Number OK0034363
October 1, 2018 through September 30, 2019

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, 2018 to Sep. 30, 2019
Report Date

Bren Summerlin
Name of Responsible Official (Tulsa)

Pretreatment Manger
Title

Bren Summerlin
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, 2018 to Sep. 30, 2019
Report Date

Stacy Thornton, City of Broken Arrow
Name of Responsible Official

Assistant Utilities Director
Title

Signature

SECTION 1

PRETREATMENT PERFORMANCE SUMMARY

PRETREATMENT PERFORMANCE SUMMARY (PPS)

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 Kimbrough: P.O. Box 610, Broken Arrow, OK 74013
Mailing Address 2

Lauren Kimbrough, Pretreatment Coordinator
Contact Person, Position

(918) 259-7000 ext. 7220
(Area Code) Contact Telephone

OK0034363
OPDES Permit Number(s)

Begin Date: 10/1/2018 End Date: 9/30/2019
Reporting Period

II. Significant Industrial User Compliance

Record the Number of SIU Who:		SIGNIFICANT INDUSTRIAL USERS Categorical	Non-categorical
I.	a. Submitted a BMR	N/A	N/A
	b. Were Required to Submit a BMR	N/A	N/A
2.	a. Submitted a 90-Day Compliance Report	N/A	N/A
	b. Were Required to Submit a 90-Day Report	N/A	N/A
3.	a. Submitted Required Self-Monitoring Reports	2	5
	b. Were Required to Submit Self-Monitoring Reports	2	5
4.	a. Met a Compliance Schedule	0	0
	b. Were Required to Meet a Compliance Schedule	0	0
5.	a. Were in Significant Noncompliance (SNC)	0	1
Additional Information:			
6.	Total Number of SIU	2	6
7.	Rate of SNC for all SIU (categorical & non-categorical)	12.5 %	

PRETREATMENT PERFORMANCE SUMMARY (PPS)

III. Compliance Monitoring Program

Record the Number of:		SIGNIFICANT INDUSTRIAL USERS Categorical	Non-categorical
I.	a. Issued Control Documents	0	4
	b. Required Control Documents	0	4
2.	a. Facilities Inspected	2	6
	b. Inspections Conducted	2	9
3.	a. Facilities Sampled	2	6
	b. Samplings Conducted	10	86

IV. Enforcement Actions

Record the Number of:		SIGNIFICANT INDUSTRIAL USERS Categorical	Non-categorical
1.	a. Compliance Schedules Issued	0	0
	b. Compliance Schedules Required	0	0
2.	Notices of Violation (NOV) Issued	0	1
3.	Administrative Orders (AO) Issued	0	0
4.	Civil Suits Filed	0	0
5.	Criminal Suits Filed	0	0
6.	Significant Violators Published	0	1
7.	SIU that were Assessed Penalties	0	2
8.	Dollars of Penalties Collected	$0	$16,651.56
9.	Other Actions (sewer bans, etc.)	0	0

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)			
									REPORTS			EFFLUENT LIMITS
			Y/N	Last Action		City	SIU		BMR	90-Day Compliance	Self-Monitoring	
Hillcrest Hospital South 8801 South 101st East Ave. TUL	8062	Non Categorical	Yes	06/21/19	N/A	5	4	1	N/A	N/A	C	C
Saint Francis Hospital South 6161 South Yale Ave. TUL	8062	Non Categorical	Yes	04/02/19	N/A	4	4	2	N/A	N/A	C	C
Southwest Regional Medical Center 10109 East 79th St. TUL	8062	Non Categorical	Yes	09/06/19	N/A	3	3	1	N/A	N/A	C	C
Broken Arrow Powder Coating (location 2) 2051 W. SW. Expressway Dr. BA	3479	Categorical	Yes	01/01/18	N/A	1	4	1	N/A	N/A	C	C
CSI Aerospace 2020 W. Detroit BA	3479	Categorical	Yes	05/01/19	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/Comgraphx 1765 N. Juniper Ave. BA	2759	Non Categorical	Yes	02/01/18	N/A	2	11	2	N/A	N/A	C	SNC
Baker Hughes 3000 N. Hemlock Cir. BA	3533	Non Categorical	Yes	09/13/19	A	1	0	2	N/A	N/A	C	C

SECTION 3

NON-COMPLIANT INDUSTRIAL USERS

NONCOMPLIANT USERS
Enforcement Actions Taken

INDUSTRIAL USER (IU) NAME AND ADDRESS	NATURE of VIOLATION			NUMBER of ACTIONS TAKEN					PENALTIES COLLECTED	CURRENT STATUS (C, NC, SNC)	COMPLIANCE SCHEDULE	
	Detected during inspection	Reports	Limits	NOV	AO	Civil	Criminal	Other			Date Issued	Completion Date
Unifirst 2100 N. Beech BA	NOT NON-COMPLIANT. SURCHARGES WERE ISSUED FOR CONVENTIONAL POLLUTANTS ABOVE RESIDENTIAL THRESHOLDS								$15,543.28	C		

Additional Notes:

SECTION 4

SIGNIFICANTLY NON-COMPLIANT INDUSTRIAL USERS

SIGNIFICANTLY NONCOMPLIANT USERS
Enforcement Actions Taken

INDUSTRIAL USER (IU) NAME AND ADDRESS	NATURE of VIOLATION		NUMBER of ACTIONS TAKEN					PENALTIES COLLECTED	CURRENT STATUS (C, NC, SNC)	COMPLIANCE SCHEDULE	
	Reports	Limits	NOV	AO	Civil	Criminal	Other			Date Issued	Completion Date
Communication Graphics/Comgraphx	X		1					$1,108.28	SNC		

Additional Notes:

CITY OF
BROKEN ARROW
Where opportunity lives

Monday, June 17, 2019

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

Re: NOTICE OF VIOLATION AND SIGNIFICANT NON-COMPLIANCE

Dear Mr. Brunner,

This letter is in response to the notification sent by Comgraphx on 5/28/19 informing the City of Broken Arrow Pretreatment Office that the monthly laboratory analysis for April was not performed. The Broken Arrow Wastewater Discharge Permit No. BA 027, issued to Comgraphx, requires laboratory analysis to be performed each month. Parameters and frequencies for this laboratory analysis can be found on pages 7-9 of the permit.

Compliance monitoring reports are due to the City of Broken Arrow Pretreatment Office by the 15th of the month and should include: the complete laboratory analysis for each monitoring location, a compliance monitoring report signed by the permit authorized signatory, and quarterly waste hauling records for monitoring locations that were not discharged.

Failure to perform self-monitoring as required by the permit is a significant violation as defined in 40 CFR 403.8(f) (2) (viii) A-H. City of Broken Arrow is required to publish an annual list of all industrial users of the public sanitary sewer system who significantly violated a federal, state, or local pretreatment standard during the previous 12-month period. In order to satisfy this requirement, publications are made in the Tulsa World during the month of October. I have attached an example of the publication for you. Please do not hesitate to contact me if you have any questions, concerns or if I can assist you in permit compliance.

Sincerely,

Lauren Wilson

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: Charles Vokes, Utilities Director, City of Broken Arrow
John Lawrance, Vice President, Comgraphx

SECTION 5

NEWSPAPER PUBLICATION OF SIGNIFICANTLY NON-COMPLIANT INDUSTRIAL USERS

TULSA WORLD

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

Account Number

1093799

CITY OF BROKEN ARROW
Attn Lauren Kimbrough
485 NORTH POPLAR AVE.
BROKEN ARROW, OK 74012

Date

October 25, 2019

Date	Category	Description	Ad Size	Total Cost
10/25/2019	Legal Notices	HAIKEY CREEK SANITARY SEWER	1 x 42.00 CL	26.88

Affidavit of Publication

604246
Published in the Tulsa World, Tulsa County, Oklahoma, October 25, 2019

PUBLIC NOTICE OF SIGNIFICANTLY VIOLATING INDUSTRIAL USERS

Regional Metropolitan Utility Authority/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 40 CFR, Part 403.8(f)(2)(viii):

October 2018-
September 2019

Comgraphx/
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

10/25/2019

Newspaper reference: 0000604246

M. Marshall
Legal Representative

Sworn to and subscribed before me this date: OCT 25 2019

Nancy Carol Moore
Notary Public

NOTARY PUBLIC SEAL
NANCY CAROL MOORE
Notary Public
State of Oklahoma
Commission # 06011684 Expires 12/08/22

My Commission expires DEC 08 2022

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, 2018 through September 30, 2019.

SECTION 7

HAIKEY CREEK WASTEWATER TREATMENT PLANT

WATER QUALITY BASED EFFLUENT CONCENTRATIONS

POTW MONITORING RESULTS SUMMARY TABLE

October 1, 2018 to September 30, 2019

Regional Metropolitan Utility Authority - Haikey Creek Wastewater Treatment Plant

TABLE III: METALS CYANIDE PHENOLS + Molybdenum	MQL (mg/l)	MDL Used (mg/l)	INFLUENT (mg/l)				EFFLUENT (mg/l)				OKLIMIT (mg/l)	MAHL (TBLL) LB/DAY	HEADWORK LOADING FOR THE REPORTING PERIOD LB/DAY					
			Sample Dates				Sample Dates						Sample Dates				Average	% of MAHL
			11/13/18	2/19/19	6/19/19	8/20/19	11/14/18	2/20/19	6/20/19	8/21/19			11/13/18	2/19/19	6/19/19	8/20/19		
Flow, mgd			**11.00**	**12.05**	**13.30**	**10.77**	**10.03**	**10.53**	**13.14**	**11.35**								
Antimony	0.06	0.01	< 0.01	< 0.01	< 0.01	< 0.010	< 0.01	< 0.01	< 0.01	< 0.01	N/A	N/A	0.45870	0.50249	0.55461	0.44911	0.49123	N/A
Arsenic	0.0005	0.0005	0.0013	0.00065	0.00072	0.0009	0.00085	< 0.0005	0.00093	0.0011	0.99687	8.18	0.11926	0.06532	0.07986	0.08084	0.08632	1.1%
Beryllium	0.005	0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	N/A	N/A	0.22935	0.25124	0.27731	0.22455	0.24561	N/A
Cadmium	0.001	0.001	< 0.001	< 0.0010	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001	0.3989	5.67	0.04587	0.05025	0.05546	0.04491	0.04912	0.9%
Chromium	0.01	0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	0.84451	81.77	0.45870	0.50249	0.55461	0.44911	0.49123	0.6%
Copper	0.001	0.001	0.0966	0.254	0.0028	< 0.001	0.0200	0.0048	0.0461	0.0045	0.12816	45.64	8.86208	25.52624	0.31058	0.04491	8.68595	19.0%
Lead	0.0005	0.0001	0.005	0.0010	< 0.0005	0.00051	0.0009	0.00018	0.0011	0.00018	0.1765	25.17	0.41283	0.10050	0.02773	0.04581	0.14672	0.6%
Mercury	0.00005	0.00005	0.000717	< 0.0000500	0.0001980	0.0000527	< 0.000863	< 0.0000500	0.0000510	< 0.0000500	0.00665	0.9331	0.06578	0.00251	0.02196	0.00473	0.02375	2.5%
Molybdenum	0.03	0.01	< 0.010	< 0.0100	< 0.01	< 0.01	< 0.010	< 0.0100	< 0.01	< 0.01	N/A	12.0433	0.45870	0.50249	0.55461	0.44911	0.49123	4.1%
Nickel	0.01	0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.0203	< 0.005	< 0.005	< 0.005	5.869	32.87	0.22935	0.25124	0.27731	0.22455	0.24561	0.7%
Selenium	0.005	0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.055	6.29	0.22935	0.25124	0.27731	0.22455	0.24561	3.9%
Silver	0.0005	0.0005	0.00056	< 0.0005	< 0.0005	< 0.0005	0.00092	< 0.0005	< 0.0005	< 0.0005	0.05605	14.5	0.05137	0.02512	0.02773	0.02246	0.03167	0.2%
Thallium	0.0005	0.0001	< 0.0005	< 0.0001	< 0.0005	< 0.0001	< 0.0001	< 0.0001	< 0.0005	< 0.0001	1.593	N/A	0.02294	0.00502	0.02773	0.00449	0.01505	N/A
Zinc	0.02	0.01	0.159	0.1060	0.087	0.142	0.0718	0.0494	0.037	0.0391	0.71509	24.53	14.58666	10.65268	9.65021	12.75470	11.91106	48.6%
Sample Dates			**11/13/18**	**2/19/19**	**6/19/19**	**8/20/19**	**11/14/18**	**2/20/19**	**6/20/19**	**8/21/19**			**11/13/08**	**2/19/19**	**6/19/19**	**8/20/19**		
Flow, mgd			**11.00**	**12.05**	**13.30**	**10.77**	**9.28**	**9.35**	**10.28**	**10.92**								
Cyanide	0.01	0.006	< 0.01	< 0.01	< 0.01	< 0.01000	< 0.01	< 0.01	< 0.01	< 0.01	0.12718	8.18	0.45870	0.50249	0.55461	0.44911	0.49123	6.0%
Total Phenolics	N/A	0.03	0.057	0.056	0.051		< 0.025	< 0.025	< 0.025		N/A	N/A	5.22918	5.62783	5.65702	---	5.50468	N/A

OTHER POLLUTANTS DETECTED (TABLE II, VI, & V)	MQL (mg/l)	MDL (mg/l)	INFLUENT (mg/l)					EFFLUENT (mg/l)			OKLIMIT (ug/l)	MAHL (TBLL) LB/DAY	HEADWORK LOADING FOR THE REPORTING PERIOD, LB/DAY					
			Sample Dates					Sample Dates					Sample Dates				Average	% of MAHL
			11/13/18	2/19/19	6/19/19	8/20/19	11/14/18	2/20/19	6/20/19	8/21/19			11/13/18	2/19/19	6/19/19	8/20/19		
Oil & Grease	N/A	N/A	19.4	17.4	12.8	17	< 5.1	< 5.4	12.5	< 5.3	N/A	N/A	1779.76	1748.64780	1419.80	1526.97060	1618.794	N/A
Methylene Chloride								0.0081			N/A	N/A	---	---	---	---	N/A	N/A
Sulfate											N/A	N/A	---	---			N/A	N/A
Ammonia											N/A	N/A	---	---			N/A	N/A
Total Phosphorus											N/A	N/A	---	---	---	---	N/A	N/A

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.)