



City of Broken Arrow

Request for Action

File #: 18-1293, **Version:** 1

Broken Arrow Municipal Authority
Meeting of: 11-20-2018

Title:

Acknowledgement of submittal of the FY 2018 Regional Metropolitan Utility Authority (RMUA)/Haikey Creek Wastewater Treatment Plant Annual Pretreatment Report to the Department of Environmental Quality (DEQ)

Background:

RMUA is required by Oklahoma Pollutant Discharge Elimination System (OPDES) Permit No. 0034363 to operate a pretreatment program in accordance with Section 402(b)(8) of the Clean Water Act, the General Pretreatment Regulations (40 CFR 403) and the provisions of the approved industrial pretreatment program. In the month of October, RMUA is required to submit a status report to DEQ of the pretreatment program activities for the previous 12 months. City of Broken Arrow pretreatment staff submitted an annual report to DEQ outlining pretreatment activities for significant industrial users that discharge wastewater to the RMUA/Haikey Creek Wastewater Treatment Basin. The report is for the period of October 2017 to September 2018.

The following is a summary of the report:

Report of Changes to the Approved Pretreatment Program

There have been no changes made or requested to the RMUA/Haikey Creek Wastewater Treatment Plant approved Industrial Pretreatment Program.

A technically based local limit study is in progress and will be submitted to DEQ by May 31, 2019. The sampling plan is included in the report, Section 7: Water Quality Based Effluent Concentrations.

Industrial User (IU) 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.

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.

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.

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 publicly owned treatment works (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 City of Broken Arrow asked Comgraphx to discontinue discharge from the silver recovery unit after it was determined that treatment was not sufficient to yield a silver result below the City of Broken Arrow permit limit. Comgraphx has been asked to modify standard operating procedures to ensure continued compliance at the other process waste stream, Screen Production.

Comgraphx submitted a 24-hour notification to the City of Broken Arrow Pretreatment Office for each violation as required. Comgraphx was issued two written notices of violation during this timeframe. The violation documentation is included in Section 4: Significantly Non-Compliant Industrial Users.

Southwest Regional Medical Center was issued a notice of violation (NOV), by the City of Tulsa Pretreatment Office, 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. The documentation is included 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 included in Section 3: Non-Compliant Industrial Users.

Pollution Prevention

Both City of Tulsa and City of Broken Arrow place a high value on pollution prevention. A list of activities for both cities is included in the report cover letter.

This concludes the report summary; the complete report is attached.

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Staff recommends that the Authority acknowledge submittal of the FY 2018 RMUA/Haikey Creek Wastewater Treatment Plant Annual Pretreatment Report to the DEQ.

Cost: \$0

Funding Source: Source

Requested By: Charles Vokes, Utilities Director

Approved By: Michael L. Spurgeon, City Manager

Attachments: FY 2018 RMUA/Haikey Creek Wastewater Treatment Plant Annual Pretreatment Report
to DEQ

Recommendation:

Acknowledge submittal of the FY 2018 RMUA/Haikey Creek Wastewater Treatment Plant Annual Pretreatment Report to DEQ