



# City of Broken Arrow

## Request for Action

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**Broken Arrow Municipal Authority  
Meeting of: 11-07-17**

**To: Chairman and Authority Members**  
**From: Utilities Department**  
**Title: Acknowledgement of Submittal of the Broken Arrow/Lynn Lane  
Fiscal Year 2017 Annual Pretreatment Report to the Department of  
Environmental Quality (DEQ)**

### **Background:**

City of Broken Arrow is required by Oklahoma Pollutant Discharge Elimination System (OPDES) Permit No. 0040053 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, the City of Broken Arrow is required to submit a status report to DEQ of the pretreatment program activities for the previous 12 months. City pretreatment staff submitted an annual report to DEQ outlining pretreatment activities for significant industrial users that discharge wastewater to the Lynn Lane Wastewater Treatment Basin. The report is for the period of October 2016 to September 2017.

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 current City of Broken Arrow/ Lynn Lane Wastewater Treatment Plant (WWTP) Approved Industrial Pretreatment Program.

### Industrial User (IU) Wastewater Survey

The IU Wastewater Survey is continually updated for 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.

A comprehensive IU Survey is performed every 5 years and was initiated in late 2016. Facilities are inspected for compliance with City of Broken Arrow Municipal Code Chapter 24, Article V, Requirements for Discharge to the Sanitary Sewer System (Industrial Pretreatment Program).

Survey inspections focused on process wastewater streams; sand interceptor and oil/water separator maintenance records; chemical storage areas; and waste manifests. Inspections were performed at automotive shops, car washes, machine shops, and manufacturing facilities. Surveys were mailed to dental offices as well as all other industrial operations in Broken Arrow. No new industrial permits were added to the City of Broken Arrow Industrial Pretreatment Program as a result of the survey during this pretreatment year. All records pertaining to the IU survey are kept at the pretreatment office.

#### 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 POTW covered under the City of Broken Arrow Industrial Pretreatment Program.

#### Report on Other Administrative Activities

During the 2016-2017 pretreatment year no Industrial Users were significantly non-compliant (SNC).

The City of Broken Arrow issued Blue Bell Creameries a consent order on January 23, 2017. The order requires Blue Bell to hire an engineer, perform a waste characterization study, use the study to choose a method of pretreatment, construct the pretreatment facility and come into compliance with Broken Arrow discharge permit BA 007. Blue Bell was assessed a \$10,000 penalty as a part of the consent order to be paid at each milestone date. \$8,000 has been received so far. Surcharges have been suspended until the proposed dissolved air flotation treatment system is in operation.

Blue Bell hired Gresham, Smith & Partners as their engineering firm, performed a waste characterization, submitted a preliminary engineering report, then final engineering report, and performed a pilot study of a portable DAF unit. Blue Bell staff has requested a meeting with City of Broken Arrow staff for the end of October to report the Pilot Study results. Blue Bell is ordered to begin construction by January 8, 2018 and have the pretreatment system constructed by January 7, 2019. The documentation is available for your review in Section 6 of the annual report.

Broken Arrow Powder Coating (Location 1) is located in the Lynn Lane WWTP basin. All operations at this location were moved to Location 2, which is in the Haikey Creek WWTP basin, effective 2/9/16. In February of 2017, the oven at Location 2 broke down and operation was temporarily moved to Location 1. Quarterly self-monitoring was performed one time at Location 1, on 3/3/17, during this pretreatment year. The City of Broken Arrow did not perform an inspection or control authority sample of Location 1.

PACCAR Winch began discharging from their permitted process in February of 2017. They submitted a 90-day compliance report which showed no violations. Their self-monitoring report for 7/7/17 revealed a daily technical review criteria (TRC) violation for copper. City of Broken Arrow issued a notice of violation (NOV) on 7/20/17. They performed 3 re-tests for copper in the month of July which were all below the daily permit limit. City staff performed significant non-compliance (SNC) calculations and found that PACCAR Winch was not SNC. The City of Broken Arrow received all proper documentation from PACCAR Winch and subsequently closed out the NOV. The documentation is available for your review in Section 3 of this report.

Ruselectric submitted the April to June 2017 quarterly monitoring report late. An NOV was issued on July 21, 2017. Please review the documentation in Section 3.

#### Pollution Prevention

The City of Broken Arrow places a high value on pollution prevention. Please read the following list of activities for FY 2017:

- Broken Arrow MET Recycle Center yearly totals: Antifreeze recycled = 850 gal; Cooking oil recycled = 254 gal; Motor oil recycled = 8,375 gal
- City of Broken Arrow cooking oil recycle station (located @ Reasor's) yearly total = 370 gal
- City of Broken Arrow has an inspector that conducts food handling establishment inspections 3 days per week. His goal is to make it to all Broken Arrow establishments twice per year. He checks the grease interceptor for proper maintenance, looks at maintenance manifests, speaks with management about best management practices, and inspects cooking oil recycle areas.
- City of Broken Arrow pretreatment staff made a presentation at the annual Homeowner's Association Workshop about fats, oil & grease (FOG) Pollution Prevention and the importance of recycling used cooking oil.
- City of Broken Arrow offers free cooking oil collection bottles and recycling instructions to residents at City Hall.
- City staff also participated in a FOG pollution prevention workshop with the DEQ pollution prevention team as well as several other larger Oklahoma pretreatment cities. The workshop provided information on start-up and maintenance of a productive FOG program, it was created for smaller, non-pretreatment cities in Oklahoma.

Staff recommends that the Authority acknowledge submittal of the Broken Arrow/Lynn Lane FY 2017 Annual Pretreatment Report to the DEQ.

**Cost:** \$0

**Prepared By:** Lauren Wilson, Pretreatment Coordinator

**Reviewed By:** Anthony Daniel, Director of Utilities Department  
Legal Department  
Assistant City Manager- Operations

**Approved By:** Michael Spurgeon, City Manager

**Attachments:** Broken Arrow/Lynn Lane FY 2017 Annual Pretreatment Report to DEQ

**Recommendation:**

Acknowledge submittal of the Broken Arrow/Lynn Lane FY 2017 Annual Pretreatment Report to DEQ.