



# 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 Regional Metropolitan Utility Authority (RMUA)/Haikey Creek 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 RMUA/Haikey Creek WWTP approved Industrial Pretreatment Program.

### 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. No new permits were added to the City of Tulsa Industrial Pretreatment Program during FY 2017. All records pertaining to City of Tulsa's survey are kept at the Tulsa Pretreatment office.

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. 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 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 RMUA/Haikey Creek WWTP Industrial Pretreatment Program.

#### Report on Other Administrative Activities

During the October 2016 to September 2017 Pretreatment year no industrial users were published as significantly non-compliant (SNC).

Southwest Regional Medical Center was issued two notices of violation (NOV) for incomplete compliance monitoring reports during FY 2017. The first NOV was verbal, per the City of Tulsa enforcement response plan, and the second was a written notice with a \$50 fine. Please see the documentation in Section 3.

Broken Arrow Powder Coating (Location 2) was issued an NOV for a zinc result of 5.73 mg/L, which is 1.19 times over the daily limit of 2.61 mg/L. The City of Broken Arrow enforcement response plan calls for a notice of violation, which was issued on May 22nd. Broken Arrow Powder Coating was asked to analyze the process waste stream for zinc for three additional days in May. There was no monthly average violation and Broken Arrow Powder Coating was asked to resume their normal sampling schedule. The documentation is attached in Section 3, for your review.

During FY 2017, Unifirst was issued surcharges in the amount of \$50,371.88 for biochemical oxygen demand (BOD), total suspended solids (TSS), and oil & grease results above residential thresholds per Broken Arrow Municipal Code Manual of Fees. Documentation on monthly surcharge amounts is attached for your review in Section 3.

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

#### 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 2017:

##### *City of Tulsa:*

##### Pharmaceutical/Medication Disposal

To protect our source water from improper disposal of medications we organize medication take back events and promote the use of permanent drop off locations. Working with other area groups, we held two events. We collected 1778 pounds of medications total.

#### Dental Mercury Amalgam

The P2 group continues to promote the application of the Best Management Practices (BMP) for Amalgam Waste developed by the American Dental Association. These BMPs, as well as the use of amalgam separators, are encouraged during dental facility inspections, which are conducted pursuant to the P2 group's Silver BMP program. .

#### Best Management Practice Programs

A majority of our work continues to be in the maintenance and further development of our BMP programs; which, are designed to reach large industry groups using a cost-effective, low burden, proactive approach beneficial for both the regulator and business. The following is a list of current programs:

1. X-ray & Photo Processors - 360 total participants; 168- Digital Lifetime PACE participants
2. Radiator Repair Shops - 0 participants
3. Printers - 6 participants
4. Individual, industry written - 13 participants
5. Food Handling Facilities - 392 participants
6. Mobile Food Vendor- 139 participants
7. Equipment/Vehicle Washing- 1 participant

#### Advertising/Outreach

This was the sixth year the P2 program received an advertising budget of approximately \$39,000, which is used to continue the "Trap the Grease" campaign promoting FOG issues to residents. The reporting year's projects include:

- Ran previous year's billboard and bus shelter ads
- Running TV and radio ads on local stations
- An after-Thanksgiving fryer oil collection event
- Outreach booths at local grocery stores
- Distributing Fat Trappers, can toppers, brochures and flyers

Other public education events include: FOG information at all Stormwater Quality public education events, 2 Earth Day events, Home and Garden Show, presentations at a Met committee meeting, booth at Guthrie Green for the National Community Planning Month and a FOG display at 2 Reasor's grocery store locations.

#### *City of Broken Arrow:*

- 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 RMUA/Haikey Creek 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:** RMUA/Haikey Creek FY 2017 Annual Pretreatment Report to DEQ

**Recommendation:**

Acknowledge submittal of the RMUA/Haikey Creek FY 2017 Annual Pretreatment Report to DEQ.