



City of Broken Arrow

Request for Action

File #: 17-2935, Version: 1

**Broken Arrow Municipal Authority
Meeting of: 12-05-17**

**To: Chairman and Authority Members
From: Utilities Department
Title:**

**Acknowledgement of Submittal to the Oklahoma Department of
Environmental Quality (DEQ) a Notice of Intent to Revise
Technically Based Local Limits (TBLL) for the City of Broken
Arrow and Regional Metropolitan Utility Authority (RMUA)
Industrial Pretreatment Program**

Background:

The Oklahoma Pollutant Discharge Elimination System (OPDES) Program, governed by the Oklahoma DEQ, requires Publicly Owned Treatment Works (POTW) with an approved Pretreatment Program to develop and enforce specific limits to control contributions to the POTW by industrial users. In Broken Arrow, these limits were developed for Arsenic, Cadmium, Chromium, Copper, Cyanide, Lead, Mercury, Molybdenum, Nickel, Silver, and Zinc and were based upon federal pretreatment standards, Oklahoma Water Quality Limits, and wastewater treatment plant design capacity. The development of these limits is a specific requirement of the OPDES permits.

The Lynn Lane Wastewater Treatment Plant OPDES Permit No. OK0040053 was renewed effective October 1, 2017. The Haikey Creek Wastewater Treatment Plant OPDES Permit No. OK0034363 will expire on May 31, 2018. A requirement of the two permits is to submit to DEQ, within 60 days of the effective date of the permit, a written certification that a technical evaluation has been performed demonstrating that the existing technically based local limits (TBLL) are based upon the current state water quality standards and are adequate to prevent pass through of pollutants, inhibition of or interference with the treatment facility, worker health and safety problems, and sludge contamination **OR** submit a written notification that a technical evaluation revising the current TBLL and a draft sewer use ordinance which incorporates such revisions will be submitted within 12 months of the effective date of the permit.

The TBLL studies for Lynn Lane and Haikey Creek Wastewater Treatment Plants were originally done in 2001 by Operations Management International (OMI), a subsidiary of CH2M HILL. A separate study was done for each plant, with the intent of using the most stringent of the calculated limits for each of the 11 parameters as the applied local limit for both wastewater plants. However, the calculated limits for each plant were so high that OMI opted to use federal categorical pretreatment standards in all instances except for Mercury, which has a calculated limit of 0.43 mg/L and Molybdenum, which has a calculated limit of 33.8 mg/L. The federal categorical pretreatment standards were developed by the Environmental Protection Agency for metal finishers and since the majority of industrial users in Broken Arrow are metal finishers, these limits were believed to be

appropriate.

Attached is a page from each TBLL study showing the calculated limits for Lynn Lane and Haikey Creek Wastewater Treatment Plants. Also attached is a table showing the applied local limits for the wastewater treatment plants.

The City of Broken Arrow Utilities Department intends to perform a new TBLL study using the same strategy that was used in the 2001 study. A separate study will be performed for each plant and then the most stringent of the two calculated limits will be applied as the new local limit for Lynn Lane and Haikey Creek Wastewater Treatment Plants. City of Broken Arrow Utilities staff will then amend the local limits in Chapter 24, Article V of the City of Broken Arrow Municipal Code. We have submitted a request to DEQ to submit these items no later than May 31, 2019, which is based upon the Haikey Creek permit renewal date. Attached is a notice of intent letter to DEQ that was mailed on November 21, 2017. This item will be included on the next agenda for the RMUA and periodic updates will be given to both BAMA and RMUA.

Staff recommends that the Authority acknowledge submittal to DEQ a Notice of Intent to Revise Technically Based Local Limits for the City of Broken Arrow and RMUA Industrial Pretreatment Program.

Cost: \$0

Prepared By: Lauren Wilson, Pretreatment Coordinator

Reviewed By: Anthony Daniel, Director of Utilities Department
Legal Department
Kenneth D. Schwab, P.E., Assistant City Manager- Operations

Approved By: Michael Spurgeon, City Manager

Attachments: Haikey Creek and Lynn Lane Calculated Local Limits Pages
Applied Local Limits
Notice of Intent to DEQ to Revise TBLL

Recommendation:

Acknowledge submittal to DEQ a Notice of Intent to Revise Technically Based Local Limits for the City of Broken Arrow and RMUA Industrial Pretreatment Program.