

Region 6 - Enforcement & Compliance Assurance Division

INSPECTION REPORT

Inspection Date(s):	9/20/2022 – 9/22/2022	
Media Program:	Drinking Water	
Regulatory Program(s)	SDWA	
Company Name:	City of Yukon	
Facility Name:	Yukon	
Facility Physical Location:	501 W Wagner Rd	
(city, state, zip code)	Yukon, OK, 73099	
Mailing address:	501 W Wagner Rd	
(city, state, zip code)	Yukon, OK, 73099	
County/Parish:	Canadian	
Facility Phone Number	(405) 354-6245	
Facility Contact:	Gary Giddins	Plant Manager
	Gary.giddins@veolia.com	
FRS Number:	110022631017	
Identification/Permit Number:	OK2000910	
Media Identifier Number:	Water	
NAICS:	541380	
SIC:	8734	
Personnel participating in inspection:		
Gary Giddins	Veolia	Plant Manager
Glenn Groves	Veolia	Operator
Anwar Jacintomoreno	EPA ECDWR	Inspector
EPA Inspector Signature/Date	ANWAR JACINTOMORENO Digitally signed by ANWAR JACINTOMORENO Date: 2022.11.17 09:32:12 -06'00'	11/17/2022
	Anwar Jacintomoreno	Date
Supervisor Signature/Date	CURRY JONES Digitally signed by CURRY JONES Date: 2022.11.15 14:57:47 -06'00'	11/15/2022
	Curry Jones	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

On Tuesday 9/20/2022, Anwar Jacintomoreno arrived at the Yukon Public Water System in Canadian County, Oklahoma at 10:00 AM. At that time, EPA Inspectors Craig Young and Jacob Lunn, along with EPA contractors Stephen Clark and John Okun met with the facility's plant manager, Gary Giddings, outside of the facility to conduct a perimeter inspection, as part of their Drinking Water Inspection. I introduced myself to Gary Giddings and presented my credentials. Following the overview of the facility's outdoor structures, we moved indoors and conducted a preliminary records review; at which point, I informed Mr. Gary Giddings that I would be conducting an unannounced SDWA laboratory inspection. In the interest of time management and logistics, it was decided we would conduct the laboratory-audit portion of the laboratory inspection during this day and would conduct the laboratory records review and laboratory methods assessments on the next two days.

FACILITY DESCRIPTION

The facility is not accredited under national or private laboratory programs. The facility operates seven days a week and operators work one-day shifts. There are 4 full-time operators, including the plant manager Gary Giddings. All operators are trained in the laboratory and perform regular sampling and analytical testing. The facility uses a contract laboratory, Accurate Environmental Laboratories, to perform most of their permit-reporting analysis and perform in-house sample analyses of: Turbidity, Alkalinity, Free Chlorine, Total Chlorine, Dissolved Oxygen, and Ammonia. Laboratory methodology assessment was conducted on 09/21/2022 with operator Glenn Groves.

Section II - OBSERVATIONS

While performing the on-site Laboratory inspection, the following observations were made:

- 1) The subsequent laboratory safety practices were found to be unsatisfactory.
 - a. Benchtop was found with multiple "secondary containers" being utilized for reagent storage, labeled with the contents but without an expiration date.
 - i. See Appendix 1 Photographs (1 – 4)
 - b. Several reagent bottles were found being utilized without being properly marked with an open date and an expiration date.
 - i. See Appendix 1 Photographs (5 – 6)
 - c. Some reagent bottles were found to be marked with a received and an opened date, but not an expiration date.
 - i. See Appendix 1 Photographs (7 – 13)
 - d. Three bottles of expired concentrated sulfuric acid were found in the acids and corrosives storage cabinet.
 - i. See Appendix 1 Photographs (14 – 16)
- 2) Standard Operating Procedures (SOP) are not properly maintained and/or followed as described below.

- a. Alkalinity Testing Procedure SOP mentions Standard Methods as a reference but does not specify which specific method is being used for the listed procedure.
 - i. See Appendix 1 Photographs (17 – 18)
 - b. Hardness Testing Procedure SOP mentions Standard Methods as a reference but does not specify which specific method is being used for the listed procedure.
 - i. See Appendix 1 Photographs (19 – 20)
 - c. Operator was observed collecting effluent grab sample and performing the Free Chlorine test without using gloves.
 - i. See Appendix 1 Photographs (21 – 22)
 - d. Records from Accurate Environmental Laboratories indicate E. coli samples have been received for testing at temperatures over 10°C on multiple occasions.
 - i. See Appendix 1 Photographs (23 – 24)
 - ii. See Appendix 3 Accurate Environmental Laboratories reports.
- 3) Laboratory bench sheets are not properly maintained, as detailed below.
- a. There is no indication whether the same technician is both collecting the samples and performing the analysis.
 - i. See Appendix 1 Photographs (25 – 27)
 - b. No information of which approved EPA method is being utilized for each test done (sample analysis), or any reference for an analytical method is found on the bench sheets.
 - i. See Appendix 1 Photographs (25 – 27)
 - c. Bench sheets are filled with no usage of units for temperature, alkalinity, and chlorine.
 - i. See Appendix 1 Photographs (25 – 27)

Section III – AREAS OF CONCERN

At the conclusion of the inspection, I met with Gary Giddings for an exit interview at 8:00 AM on September 22, 2022. At that time, we detailed a review of the observations found during the laboratory inspection and some of the areas of concern (AOC) noted during the onsite inspection that will require additional follow-up or correction. Exit interview concluded at 9:00 AM. The facility will be provided with copies of photographs detailing the listed observations above, taken during the onsite inspection. During the subsequent document review, we observed AOCs that will require additional follow-up or correction. These AOCs include:

1. **Laboratory practices:** Per the SDWA, all methods performed for the monitoring and analytical requirements for public water systems shall comply with EPA approved methods, listed in 40 CFR Part 141, or the EPA approved alternative methods listed in the aforementioned Appendix A to subpart C. Proper use of Personal Protective Equipment (PPE) must be implemented, using clean PPE in good physical condition. All reagents, reagent water, standards, and equipment must meet the requirements per each EPA approved method. Reagents and standards must be clearly labeled with open and updated expiration dates, to ensure they are not used past expiration. Unless otherwise noted by the manufacturer, liquid reagents and standards have a shelf life of one (1) year after opening. Should the manufacturer expiration date occur before the one year mark after opening, the manufacturer's expiration date takes precedence. EPA

approved methods may further specify the shelf life of reagents, standards, or solutions created in house for the purpose of analysis or calibration. Expired reagents and standards must not be used in sample analysis or calibration of laboratory equipment, as they do not meet the quality assurance and quality control (QA/QC) requirements per the EPA approved methods. All reagents and standards used in analysis must be clearly labeled with contents and updated expiration date to ensure all QA/QC requirements are fulfilled.

2. **Standard Operating Procedures and supporting documentation:** Per the SDWA, all methods performed for the analysis of pollutants shall comply with EPA approved methods (40 CFR Part 141, Subpart C). Facilities must have written SOPs documenting the use of EPA approved methods and QA/QC measures to ensure compliance with the SDWA (40 CFR Part 141, Subpart C). To ensure compliance with these requirements, SOPs should be regularly reviewed, updated, and fully and correctly cite the EPA approved methods being utilized. The techniques and methods utilized in the laboratory for analysis must meet the method requirements as detailed in an EPA approved method. SOPs and bench sheets must follow a referenced EPA approved method, any deviation may result in the subsequent data to be ruled invalid. Samples must be maintained in a dark and cool but unfrozen environment ($<10^{\circ}\text{C}$) if they cannot be processed and analyzed within the hour and should be maintained at $<10^{\circ}\text{C}$ when being transported, in accordance with Standard Methods Section 9060 B.1 (Holding Time and Temperature).

Samples are being collected and stored in the laboratory refrigerator for weekly pick up, which only occurs on Wednesdays. As such, the holding time of E. Coli. samples are exceeding the accepted holding time from collection to analysis of 30 hours. Standard Methods Section 9060 B.1.b.

3. **Bench sheets and supporting documentation:** Bench sheets must record the data and information as required per the EPA approved methods used for analysis and the SDWA. The SDWA and EPA approved methods require the time of both sample collection and sample analysis (40 CFR 141.33). The SDWA requires the identification of both the person who collected the sample and the person responsible for performing analysis (40 CFR 141.33). Additionally, the SDWA requires a reference to the EPA approved method used for analysis as well as the results of the analysis, including all information gathered during sample analysis (40 CFR 141.33). To ensure compliance with QA/QC requirements, bench sheets should reflect when the last review and update was performed.

- a. The time for both sample collection and sample analysis are recorded to ensure analysis is performed within the hold time as required by the EPA approved method used for analysis.

- b. The data recorded on bench sheets should clearly demonstrate the methods used and be representative of everything the technician performed during analysis.

Section IV – FOLLOW UP

No additional information was received by EPA after exiting the Facility on 09/22/2022.

Section V – LIST OF APPENDICES

Appendix 1 –Photograph Log

Appendix 2 –Operator Licenses

Appendix 3 – Accurate Environmental Laboratories reports

City of Yukon

Laboratory Inspection Report Appendix 1

Photograph Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: 501 W Wagner Rd		
City: Yukon	County/Parish: Canadian	State: Oklahoma



Designated containers being utilized for reagent storage are missing an expiration date on label.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: 501 W Wagner Rd		
City: Yukon	County/Parish: Canadian	State: Oklahoma



Designated containers being utilized for reagent storage and are missing an expiration date on label.

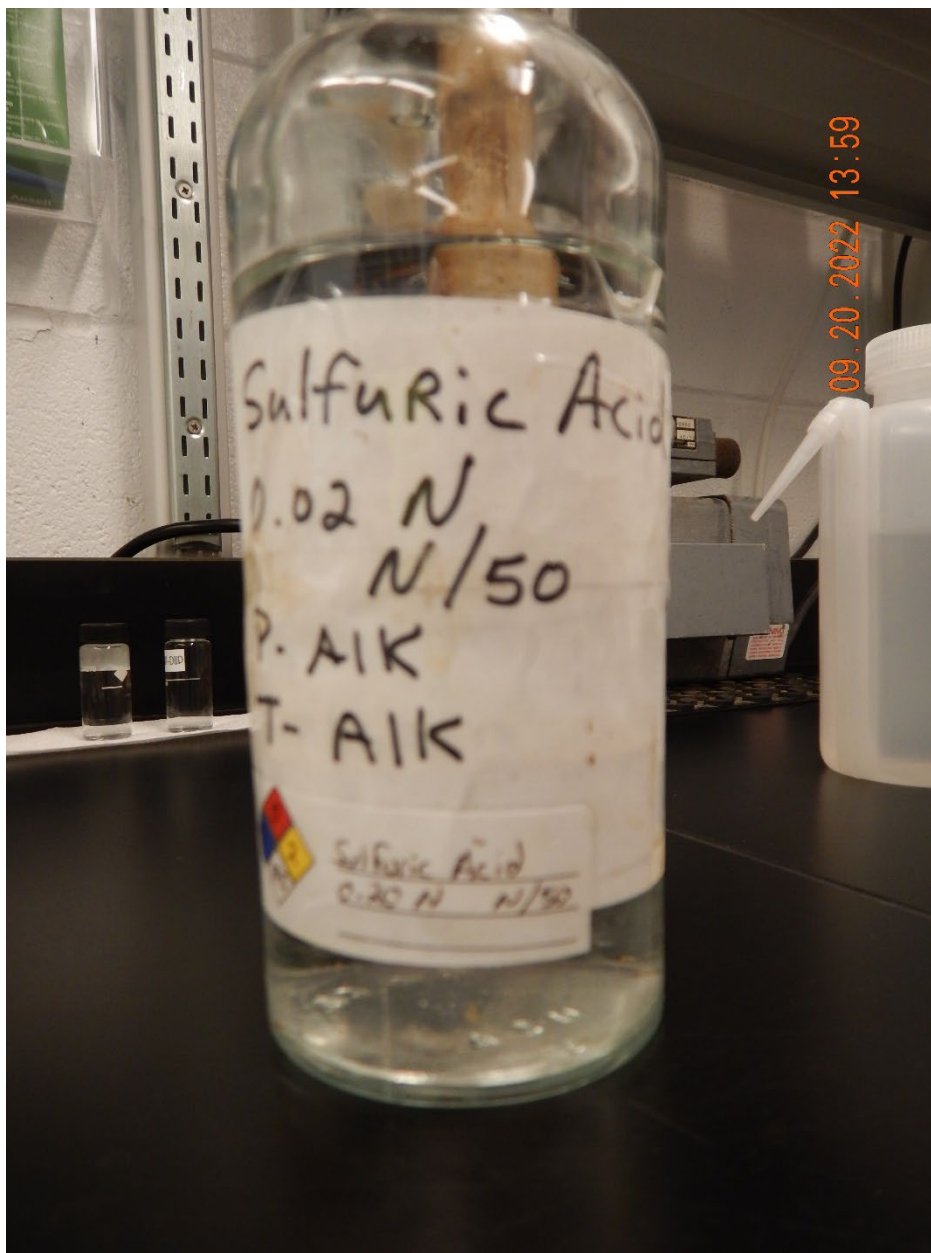


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: 501 W Wagner Rd		
City: Yukon	County/Parish: Canadian	State: Oklahoma



Designated containers being utilized for reagent storage and are missing an expiration date on label.

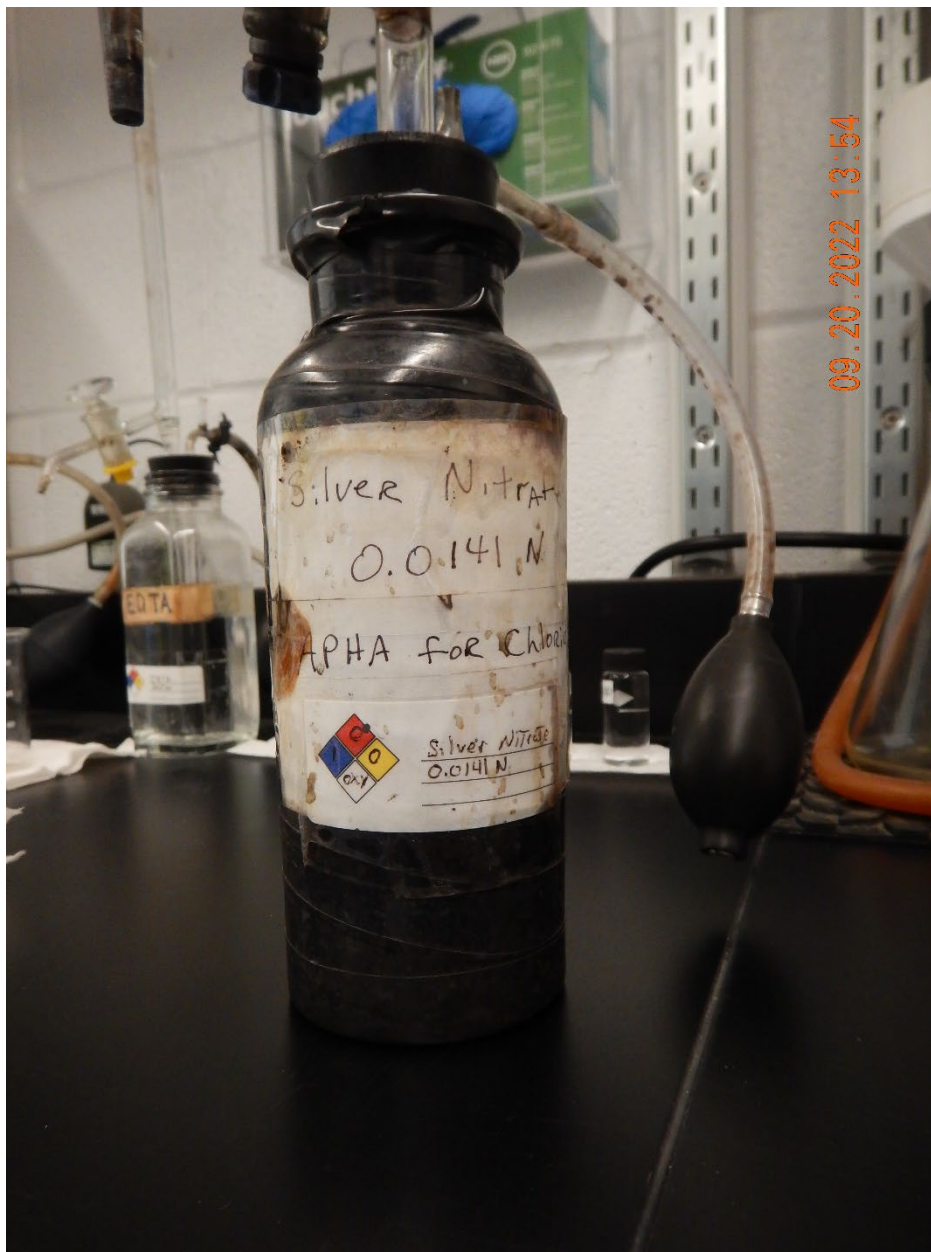


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: 501 W Wagner Rd		
City: Yukon	County/Parish: Canadian	State: Oklahoma



Designated containers being utilized for reagent storage and are missing an expiration date on label.

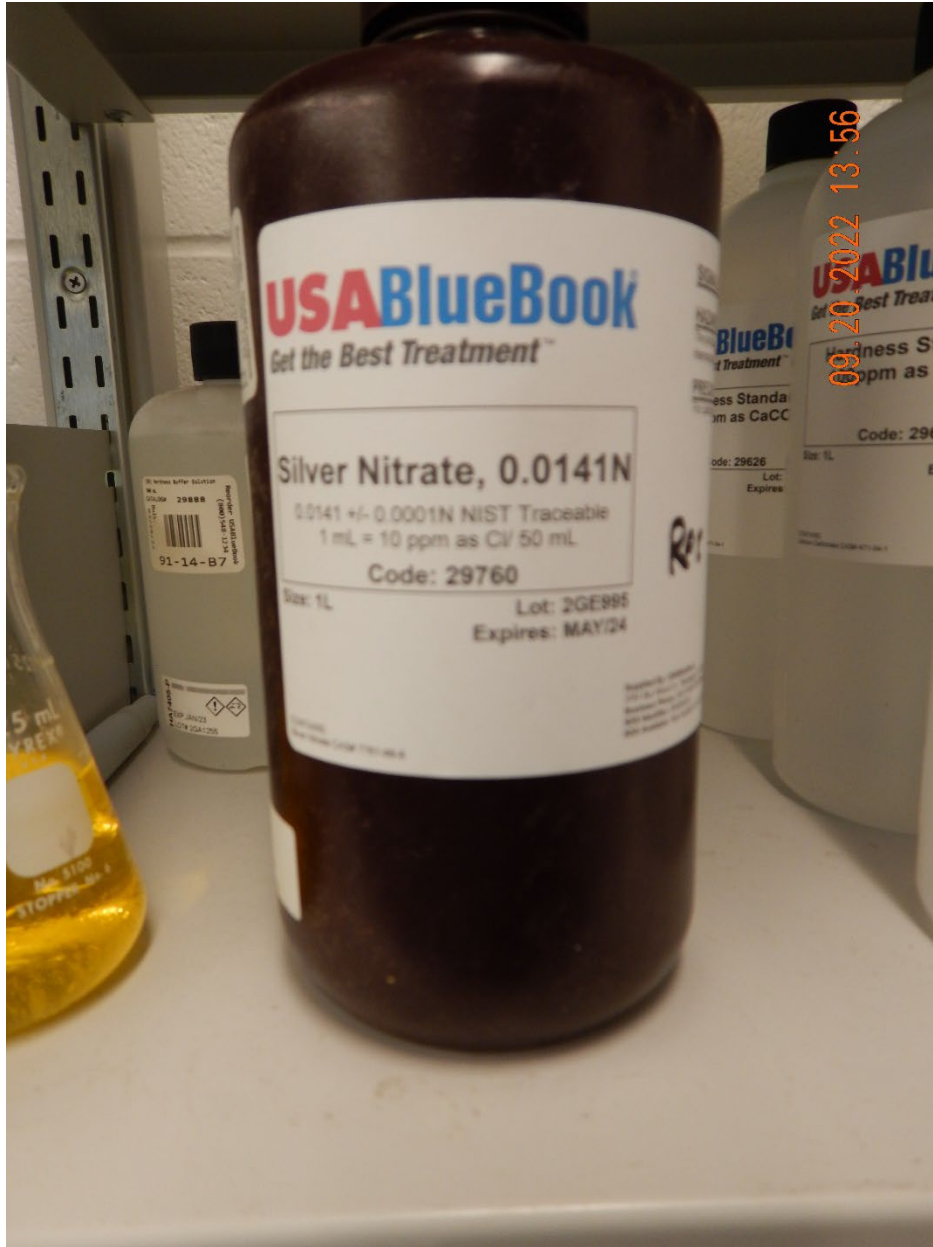


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: 501 W Wagner Rd		
City: Yukon	County/Parish: Canadian	State: Oklahoma



Multiple reagent bottles were found being utilized without being properly marked with an open date and an updated expiration date. *Reagents and standards must be clearly labeled with open and updated expirations dates, to ensure they are not used past expiration. Unless otherwise noted by the manufacturer, liquid reagents and standards have a shelf life of one (1) year after opening.*

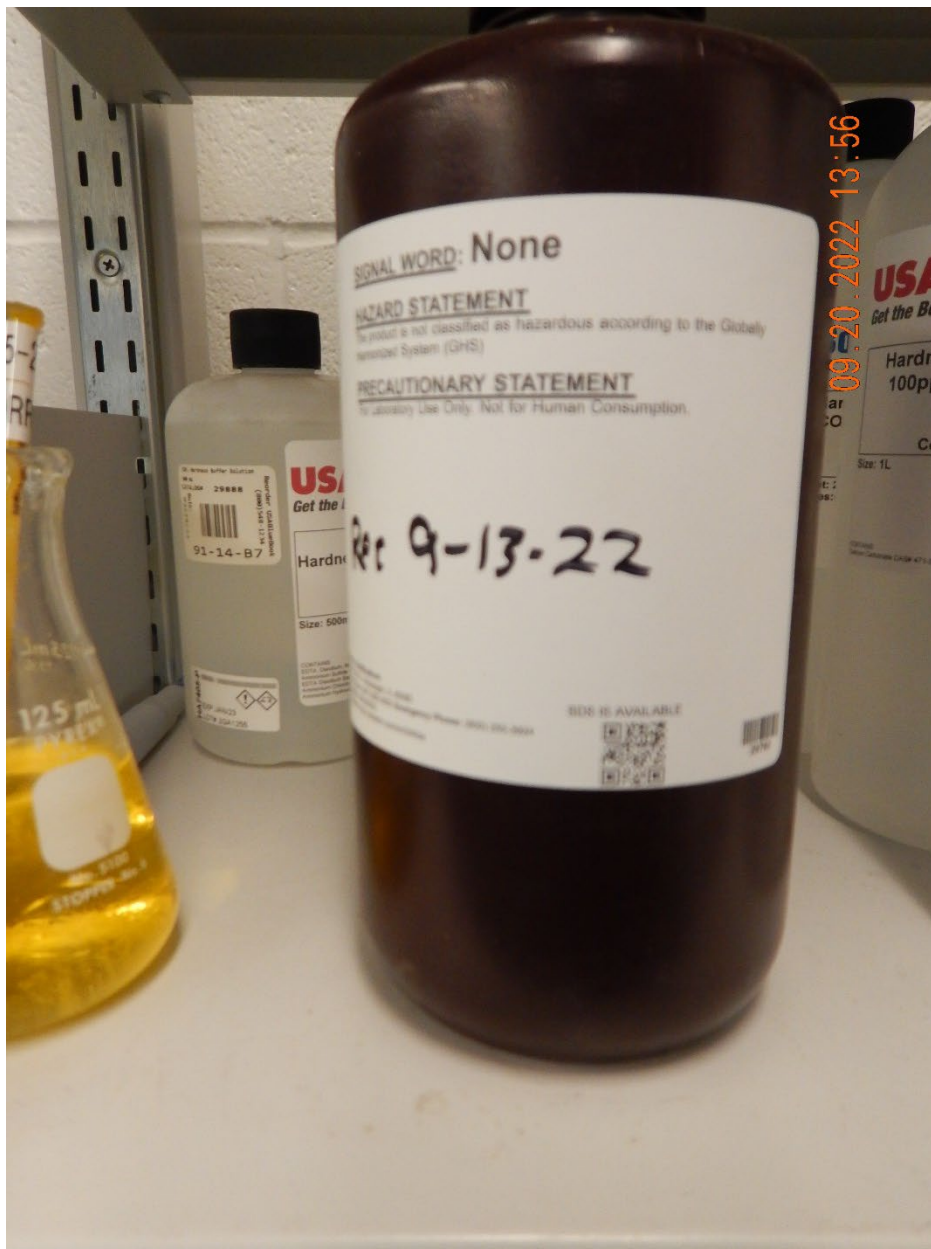


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: 501 W Wagner Rd		
City: Yukon	County/Parish: Canadian	State: Oklahoma



Multiple reagent bottles were found being utilized without being properly marked with an open date and an expiration date.

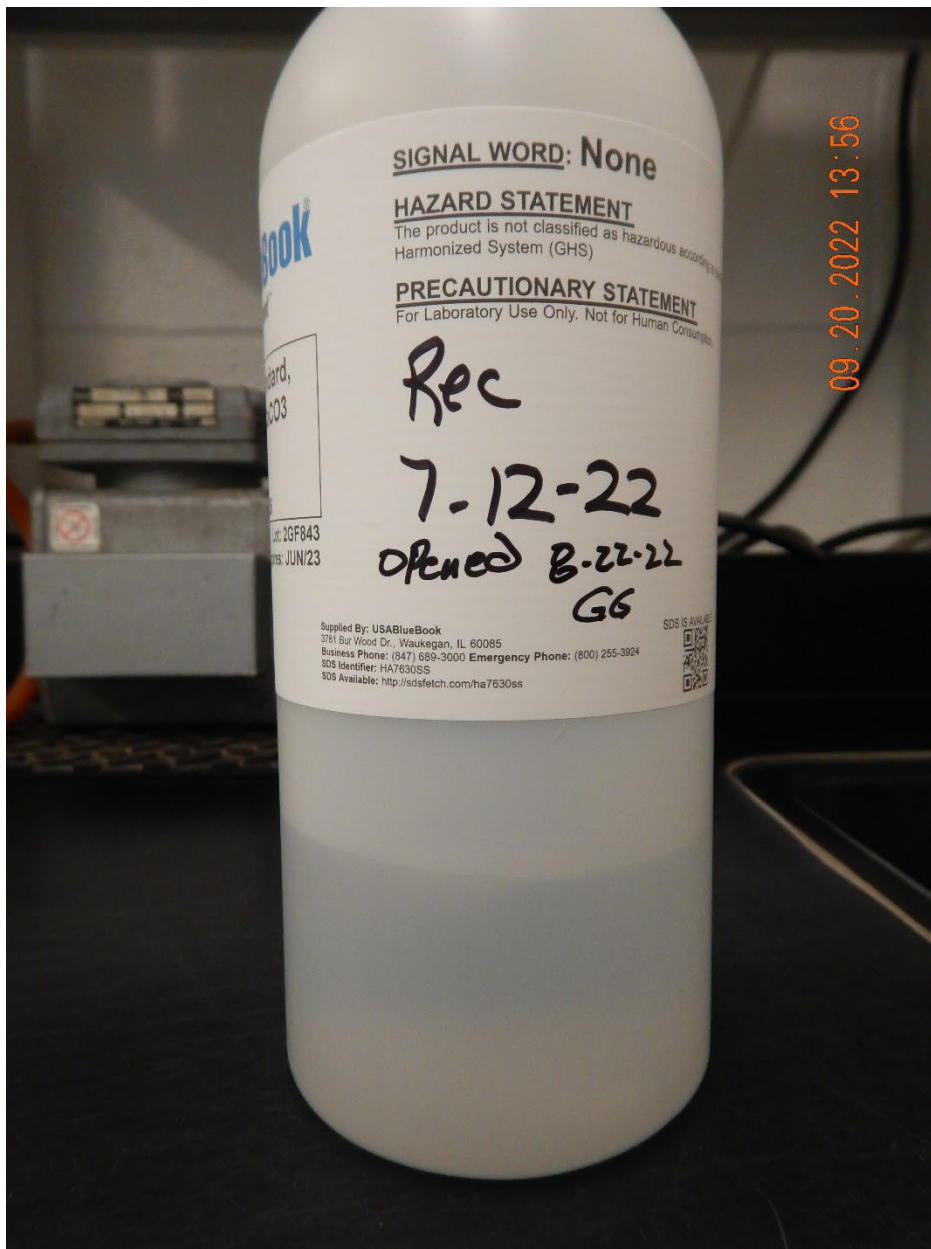


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: 501 W Wagner Rd		
City: Yukon	County/Parish: Canadian	State: Oklahoma



Multiple reagent bottles were found to be marked with a received and an open date, but without an expiration date.

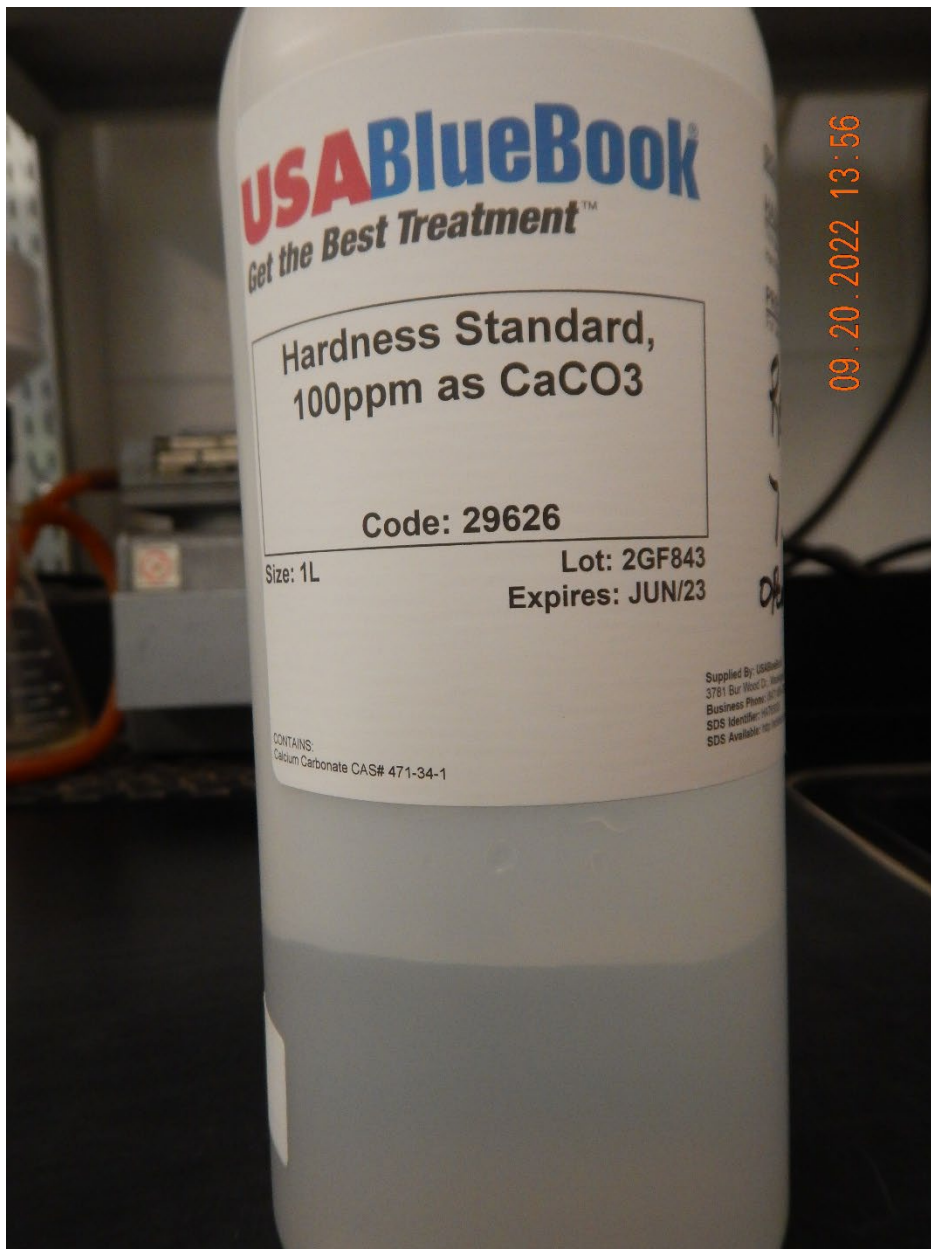


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: 501 W Wagner Rd		
City: Yukon	County/Parish: Canadian	State: Oklahoma



Multiple reagent bottles were found to be marked with a received and an open date, but without an updated expiration date. *Reagents and standards must be clearly labeled with open and updated expirations dates, to ensure they are not used past expiration. Unless otherwise noted by the manufacturer, liquid reagents and standards have a shelf life of one (1) year after opening.*

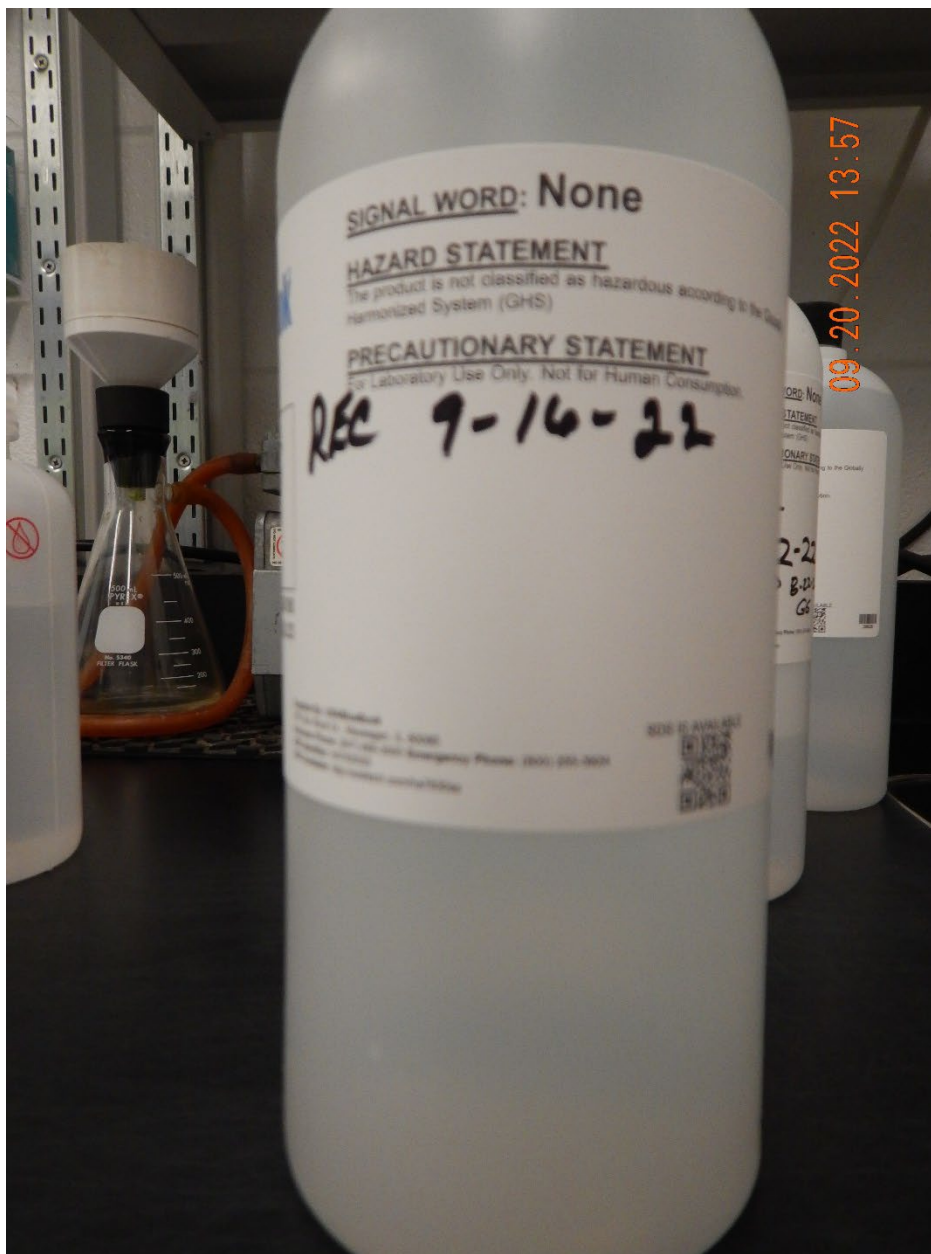


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: 501 W Wagner Rd		
City: Yukon	County/Parish: Canadian	State: Oklahoma



Multiple reagent bottles were found to be marked with a received and an open date, but without an expiration date.

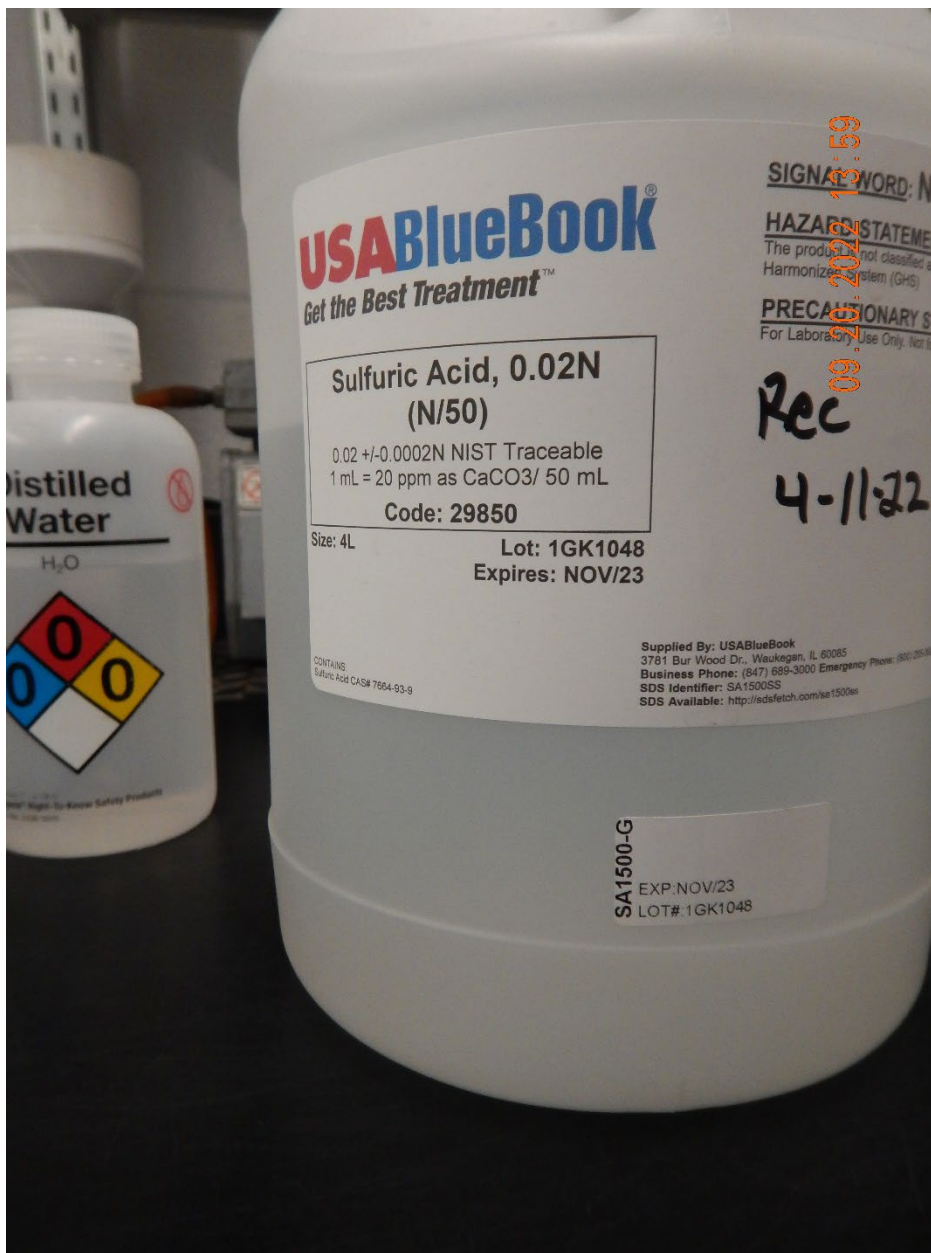


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location: 501 W Wagner Rd		
City: Yukon	County/Parish: Canadian	State: Oklahoma



Multiple reagent bottles were found to be marked with a received and an open date, but without an updated expiration date. *Reagents and standards must be clearly labeled with open and updated expirations dates, to ensure they are not used past expiration. Unless otherwise noted by the manufacturer, liquid reagents and standards have a shelf life of one (1) year after opening.*

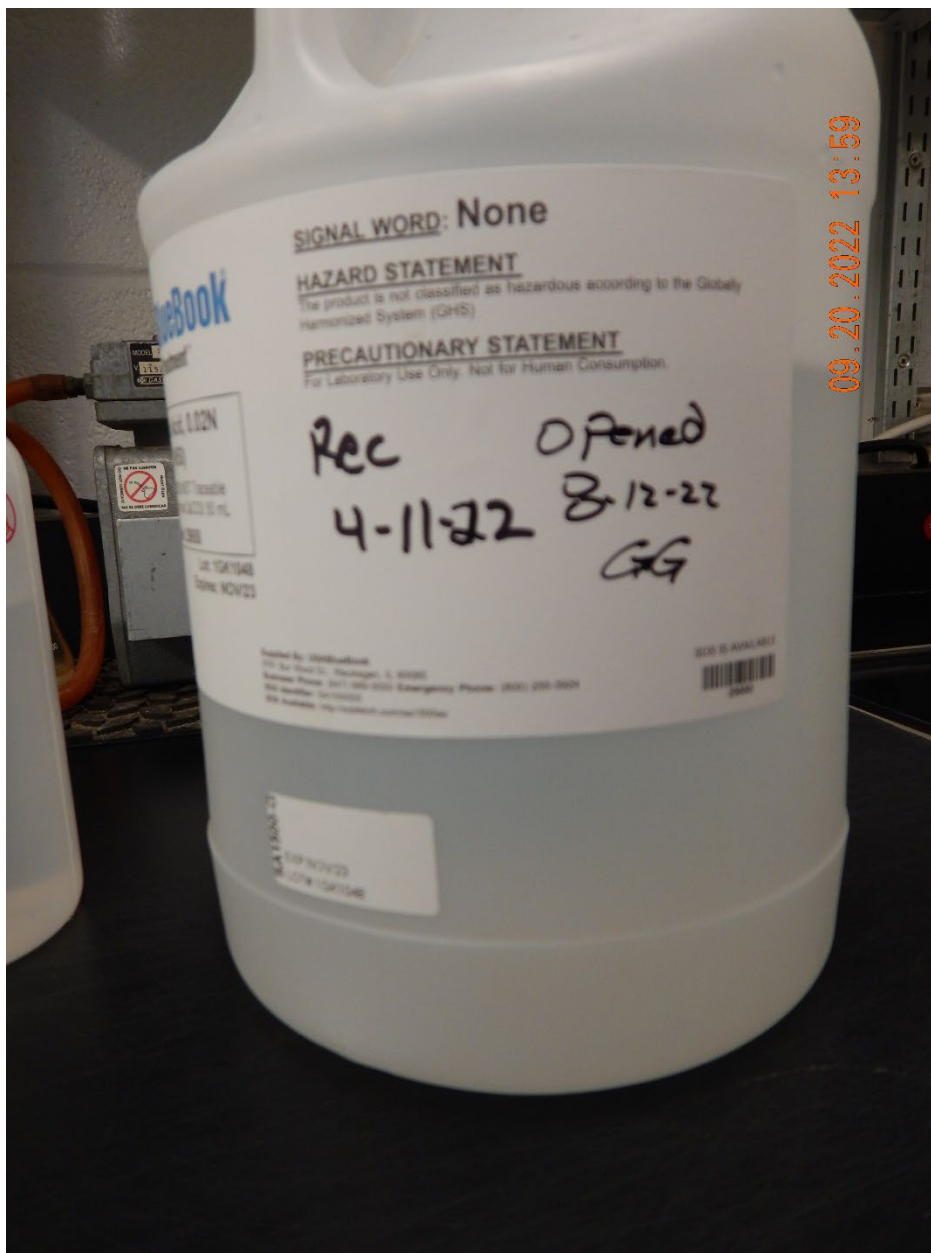


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Location: 501 W Wagner Rd		
City: Yukon	County/Parish: Canadian	State: Oklahoma



Multiple reagent bottles were found to be marked with a received and an open date, but without an expiration date.

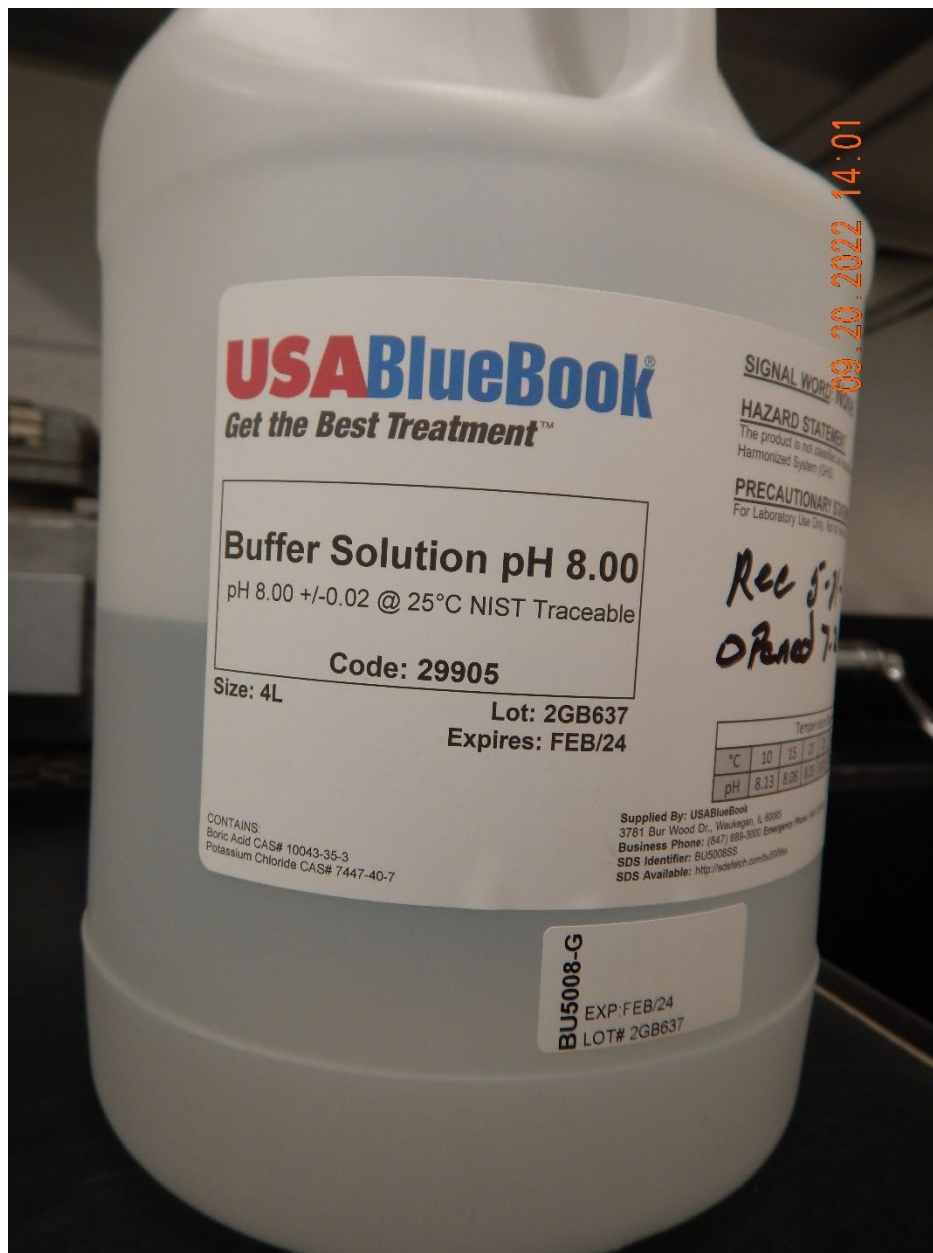


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

Location: 501 W Wagner Rd		
City: Yukon	County/Parish: Canadian	State: Oklahoma



Multiple reagent bottles were found to be marked with a received and an open date, but without an updated expiration date. *Reagents and standards must be clearly labeled with open and updated expirations dates, to ensure they are not used past expiration. Unless otherwise noted by the manufacturer, liquid reagents and standards have a shelf life of one (1) year after opening.*

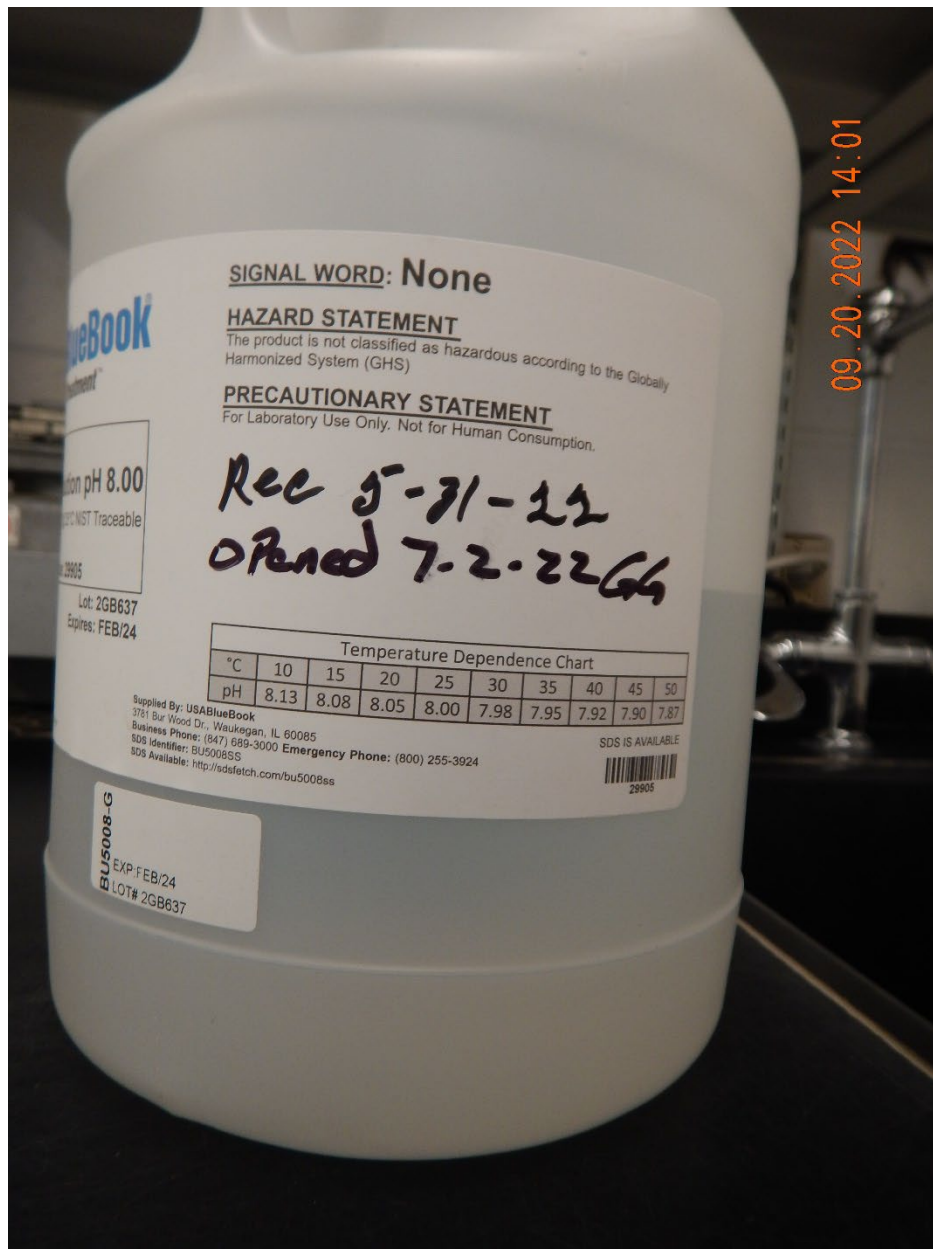


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 13

Location: 501 W Wagner Rd		
City: Yukon	County/Parish: Canadian	State: Oklahoma



Multiple reagent bottles were found to be marked with a received and an open date, but without an expiration date.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 14

Location: 501 W Wagner Rd		
City: Yukon	County/Parish: Canadian	State: Oklahoma



Three bottles of expired concentrated sulfuric acid were found in the acids and corrosives storage cabinet.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 15

Location: 501 W Wagner Rd		
City: Yukon	County/Parish: Canadian	State: Oklahoma



Three bottles of expired concentrated sulfuric acid were found in the acids and corrosives storage cabinet.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 16

Location: 501 W Wagner Rd		
City: Yukon	County/Parish: Canadian	State: Oklahoma



Three bottles of expired concentrated sulfuric acid were found in the acids and corrosives storage cabinet.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 17

Location: 501 W Wagner Rd		
City: Yukon	County/Parish: Canadian	State: Oklahoma

VEOLIA WATER
Veolia Water North America

Standard Operating Procedure (SOP)

Issued by: Yukon
Approval: Gary Giddings
Project Manager

SOP No: 23
Revision No: 1
Effective Date: 2/4/21

SUBJECT: Alkalinity Testing Procedure

5.0 PROCEDURE:

1. Measure 50 ml of the water to be tested in the graduated cylinder.
2. Pour into the casserole.
3. Add 3 drops of PHENOLPHTHALEIN INDICATOR SOLUTION to the casserole and stir.
4. If the water does not change to a pink color, there is no "P" Alkalinity present, and the reading is reported as "zero". If the water does change to a pink color, "P" Alkalinity is present and the test should be continued.
5. By squeezing the plastic bottle of the automatic burette, force the SULFURIC ACID SOLUTION slowly from the burette to just above the zero mark. Then allow the excess to drain back automatically into the plastic bottle.
6. While stirring the sample constantly, add the SULFURIC ACID SOLUTION slowly from the burette to the casserole until the pink color disappears and the water turns clear or resumes the original color of the sample before the PHENOLPHTHALEIN INDICATOR SOLUTION was added. This is the endpoint. Read the burette. The "P" Alkalinity is the burette reading multiplied by 20.
7. To the same sample without refilling the burette, add 3 to 4 drops of METHYL PURPLE INDICATOR SOLUTION to the casserole and stir.
8. If the water changes to a purple color, the "M" Alkalinity is equal to the "P" Alkalinity. If the water changes to a green color, "M" Alkalinity is present and the test should be continued.
9. While stirring the water constantly, add SULFURIC ACID SOLUTION slowly from the burette to the casserole until the green color changes to purple. This is the endpoint. Read the burette.

The "M" Alkalinity is equal to the total ml of SULFURIC ACID SOLUTION used multiplied by 20. RESULTS: When testing a 50 ml sample: (Burette reading of both the P and M titration in ml x 20 = ppm Total (P&M) Alkalinity as CaCO₃)
EXAMPLE: 8.0 ml in "P" reading + 6.0 in "M" reading = 14 ml "P" Alkalinity = 8.0 ml x 20 = 160 ppm "M" Alkalinity = 14 x 20 = 280 ppm

NOTE A: If the endpoint color is difficult to see, repeat the entire test using 15 drops of METHYL PURPLE INDICATOR SOLUTION.

NOTE B: Just before the endpoint is reached, the green color fades to a gray color and then becomes dark purple. The endpoint is the first appearance of a permanent purple color.

NOTE C: The "OH" Alkalinity is calculated using the following formula: (2 P-M) = OH EXAMPLE: [(2 x 160 ppm) - 280 ppm] = 40 ppm OH Alkalinity REAGENTS AND APPARATUS FOR "P", "M", "OH" ALKALINITY TEST:

Page 2 of 4

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Alkalinity Testing Procedure SOP does not specify which specific method is being used for the listed procedure.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 18

Location: 501 W Wagner Rd		
City: Yukon	County/Parish: Canadian	State: Oklahoma

VEOLIA Veolia Water North America

Standard Operating Procedure (SOP)

Issued by: Yukon
Approval: Gary Giddings
Project Manager

SOP No: 23
Revision No: 1
Effective Date: 2/4/21

SUBJECT: Alkalinity Testing Procedure

Quality Control:

- Daily Maintenance Log
- QAQC Alkalinity Accuracy Benchbook
- QAQC Alkalinity Precision Benchbook
- Field sample collection documentation

6.0 SAFETY REQUIREMENTS

PPE required is as follows

- Safety glasses
- Steel Toe Boots
- Protective gloves

7.0 TRAINING TO EMPLOYEES

All Plant Operators

8.0 REVIEW AND APPROVAL

Reviewer / Title	Revision No.	Review Date
Gary Giddings, Project Manager	Reviewed	2/4/21
Name, Title	Revision reviewed	Date or review
Name, Title	Revision reviewed	Date or review

Approved by: State who approved this instruction.
Title: State their title
Date: The date when the instruction was approved (this may be prior to the issue or effective date).

9.0 CHANGE HISTORY

Revision Number	Summary of Changes	Issue Date	Effective Date
1	Initial issue	2/4/21	2/4/21
2.0	Briefly describe what was changed from the earlier issue. List each revision as a separate line item on this table.	Date of issue of revision	Effective Date of revision

Page 3 of 4
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Alkalinity Testing Procedure SOP does not specify which specific method is being used for the listed procedure.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 19

Location: 501 W Wagner Rd		
City: Yukon	County/Parish: Canadian	State: Oklahoma

VEOLIA WATER Veolia Water North America **Standard Operating Procedure (SOP)**

Issued by: Yukon
Approval: Gary Giddings
Project Manager

SOP No: 25
Revision No: 1
Effective Date: 7/15/21

SUBJECT: Hardness Testing Procedure

1.0 SCOPE

This document applies to the Measurement of liquid laboratory samples.

2.0 PURPOSE

Influent and Effluent Hardness measurements are a State and Federal requirement of every Wastewater Plant. The frequency or how often measurements are required is determined by the NPDES or OPDES Permits. Guidelines for taking Hardness measurements and maintenance can be found in Standard Methods, the company QAQC manual and the manufacturer's manual.

3.0 TRIGGER

- This SOP can be used to assist in training new personnel to perform Hardness measurements properly.
- General reference when time has lapsed from doing the procedure as a result of seasonal / frequency of permit requirements or absence from the work place.
- Requirements for Influent and Effluent Hardness measurements are: **Daily**

4.0 RESPONSIBILITIES

All Plant Operators

09.22.2022 08:25

Page 1 of 4 Controlled document. Uncontrolled copies may not be up-to-date. Information contained herein is company confidential and for internal use only. Issued by Veolia Water North America Operating Services, LLC.

Hardness Testing Procedure SOP mentions Standard Methods as a reference but does not specify which specific method is being used for the listed procedure.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 20

Location: 501 W Wagner Rd		
City: Yukon	County/Parish: Canadian	State: Oklahoma

VEOLIA WATER Veolia Water North America

Standard Operating Procedure (SOP)

Issued by: Yukon
Approval: Gary Giddings
Project Manager

SOP No: 25
Revision No: 1
Effective Date: 7/15/21

SUBJECT: Hardness Testing Procedure

5.0 PROCEDURE:

- Take 50 ml Sample in a 250 ml conical flask.
- Add 2 – 4 ml Ammonia Buffer and mix by stirring.
- Add 3-4 drop EBT indicator.
- Titrate against 0.02 N EDTA solution.
- Check for the end point – Wine Red to Blue color.

Hardness Calculation:

Total Hardness as CaCO₃ (ppm) = (TV X Normality of EDTA X 1000 X 50)/ Sample volume

Quality Control:

- Daily Maintenance Log
- QAQC Hardness Accuracy Benchbook
- QAQC Hardness Precision Benchbook
- Field sample collection documentation

6.0 SAFETY REQUIREMENTS

PPE required is as follows:

- Safety glasses
- Steel Toe Boots
- Protective gloves

7. TRAINING TO EMPLOYEES

All Plant Operators

8. REVIEW AND APPROVAL

Reviewer / Title	Revision No.	Review Date
Gary Giddings, Project Manager	Revised	7/14/21
Name, Title	Revision reviewed	Date or review

Page 2 of 4

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Hardness Testing Procedure SOP mentions Standard Methods as a reference but does not specify which specific method is being used for the listed procedure.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 21

Location: 501 W Wagner Rd		
City: Yukon	County/Parish: Canadian	State: Oklahoma



Operator was observed collecting an effluent grab sample and performing the Free Chlorine test without using gloves.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 22

Location: 501 W Wagner Rd		
City: Yukon	County/Parish: Canadian	State: Oklahoma



Operator was observed collecting an effluent grab sample and performing the Free Chlorine test without using gloves.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 23

Location: 501 W Wagner Rd		
City: Yukon	County/Parish: Canadian	State: Oklahoma

September 14, 2022
Client: Veolia Water - Yukon
501 West Wagoner Road
Yukon, OK 73099
Requested By: Gary Giddings

Accurate Environmental Laboratories

National Environmental Laboratory Accreditation Program
ODEQ TNI Certified

09.20.2022 13:35

Sample Project Name: WWTP
Date Samples Received: September 12, 2022 Time: 8:15 sample temp upon arrival at lab = 13.60°C
Matrix: Water
Lab Log Numbers: EI12002-01
Work Order: EI12002
Report #: EI12002-0914221327
EPA Lab ID#s: Stillwater OK00092 Tulsa OK00983 OKC OK00129 ICR OK 001
Oklahoma Certification: Stillwater NELAP WasteWater, ODEQ 8316/ Drinking Water, DEQ D9602
NELAP Tulsa WasteWater, ODEQ 9905 / Drinking Water, DEQ D9901
Oklahoma City NELAP WasteWater ODEQ 7202 / Drinking Water, DEQ D9937
Kansas Certification: Stillwater NELAP CERT # E-10219
Method Reference: 40 CFR 136, 141, and 261 Methods for Chemical Analysis of Water and Wastes
EPA-600/4-79-020, March 1983. Test Methods for Evaluating Solid Wastes,
SW-846, Final Update III. Standard Methods 1998 (20th Edition), Standard
Methods 2005 (21st Edition) and Standard Methods 2011 (22nd Edition) for the
Examination of Water and Wastewater.
Analysis Reference: If qualifiers present in "Prep Info" or "Analysis Info", then analysis performed as
follows: @= Tulsa Lab and * = OKC Lab. If no qualifiers present, then analysis
performed at Stillwater Lab.
Accurate Environmental Laboratories certify that the test results performed at the
Stillwater lab meet all requirements of NELAP. Any exceptions to this can be
found in the report footer or Quality Control Section of the report.
This report is to only be replicated in its entirety.
Accurate Environmental sampling protocol was followed for any sampling
performed by Accurate Field Services.

Records from Accurate Environmental Laboratories indicate *E.Coli.* samples have been received for testing at temperatures over 10°C.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 24

Location: 501 W Wagner Rd		
City: Yukon	County/Parish: Canadian	State: Oklahoma

Client: Veolia Water - Yukon

September 15, 2022

Client: Veolia Water - Yukon

501 West Wagoner Road

Yukon, OK 73099

Requested By: Gary Giddings

Accurate Environmental Laboratories

NEW ACCURATE LABORATORY

National Environmental Laboratory Accreditation Program
ODEQ TNI Certified

09.20.2022 13:37

Sample Project Name: WWTP

Date Samples Received: September 13, 2022 Time: 8:00 sample temp upon arrival at lab = 15.10°C

Matrix: Water

Lab Log Numbers: EI13004-01

Work Order: EI13004

Report #: EI13004-0915221537

EPA Lab ID#'s: Stillwater OK00092 Tulsa OK00983 OKC OK00129 ICR OK 001

Oklahoma Certification: Stillwater NELAP WasteWater, ODEQ 8316/ Drinking Water, DEQ D9602
NELAP Tulsa WasteWater, ODEQ 9905 / Drinking Water, DEQ D9901
Oklahoma City NELAP WasteWater ODEQ 7202 / Drinking Water, DEQ D9937

Kansas Certification: Stillwater NELAP CERT # E-10219

Method Reference: 40 CFR 136, 141, and 261 Methods for Chemical Analysis of Water and Wastes
EPA-600/4-79-020, March 1983. Test Methods for Evaluating Solid Wastes,
SW-846, Final Update III. Standard Methods 1998 (20th Edition), Standard
Methods 2005 (21st Edition) and Standard Methods 2011 (22nd Edition) for the
Examination of Water and Wastewater.

Analysis Reference: If qualifiers present in "Prep Info" or "Analysis Info", then analysis performed as
follows: @= Tulsa Lab and * = OKC Lab. If no qualifiers present, then analysis
performed at Stillwater Lab.

Accurate Environmental Laboratories certify that the test results performed at the
Stillwater lab meet all requirements of NELAP. Any exceptions to this can be
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Accurate Environmental sampling protocol was followed for any sampling
performed by Accurate Field Services.

Records from Accurate Environmental Laboratories indicate *E.Coli*. samples have been received for testing at temperatures over 10°C.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 25

Location: 501 W Wagner Rd		
City: Yukon	County/Parish: Canadian	State: Oklahoma

CITY OF YUKON LAB BENCH SHEET

Veolia Water

DATE 1-14-22
TIME 07:00
TEMP 33
WIND _____
Initials AW

W.C. _____ H.I. _____
HUMIDITY _____
BAR. PRESS _____
CLOUD COVER 1

RAINFALL _____
1=CLR
2=PT. CLDY
3=CLDY

	INF	EFF	TAP PLANT	TAP DIST	POE CL2	AERA BASIN	RAS	WAS	UP STREAM	DOWN STREAM
TIME GRAB	0750	0757	07:20	0719	0702	0755				
TIME RUN	0805	0810	07:25	0721	0707	0758				
FLOW / GPM	615	982								
PH #1	7.31	6.99	8.47							
PH #2	7.32	7.00	8.48							
TEMPERATURE	14	14	15			15				
DISSOLVED OXY		5.02				3.17				
P-ALKALINITY			6							
T-ALKALINITY	332	196	120							
CHLORIDE	196.65	73								
HARDNESS 1			54							
HARDNESS 2										
AMMONIA NH3	25	0.1								
5 MIN. SETT.										
30 MIN. SETT.										
60 MIN. SETT.	3	.1								
FREE CHLORINE	Time		.21	.20	0.19					
TOTAL CHLORINE	Time 08:25	.01	1.83	1.41	1.28					
MLSS	08:28	.02								
MLVSS %										
S.V.I.										

Drumms 0713 2.15
0715 0.22
Contae 1.11
0900
0903

01-20-2022 13:12

Laboratory bench sheets are not properly maintained; there is no indication whether the same technician is both collecting the samples and performing the analysis, no information of which approved EPA method is being utilized for each test, and no usage of units for temperature, alkalinity, and chlorine.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 26

Location: 501 W Wagner Rd		
City: Yukon	County/Parish: Canadian	State: Oklahoma

CITY OF YUKON LAB BENCH SHEET

Veolia Water

DATE 3-2-22
TIME 0700
TEMP 45
WIND _____
Initials ES

W.C. _____ H.I. _____
HUMIDITY _____
BAR. PRESS _____
CLOUD COVER 1

RAINFALL _____
1=CLR
2=PT. CLDY
3=CLDY

TIME GRAB	INF	EFF	TAP PLANT	TAP DIST	POE CL2	AERA BASIN	RAS	WAS	UP STREAM	DOWN STREAM
TIME RUN	0733	0740	0710	0718	0659	0737				
FLOW / GPM	0748	0750	0715	0720	0701	0746				
PH #1	8.12	7.05								
PH #2	7.37	7.15	8.66							
TEMPERATURE	7.38	7.16	8.67							
DISSOLVED OXY	16	15	13			16				
P-ALKALINITY		4.64				.40				
T-ALKALINITY			4							
CHLORIDE	332	222	130							
HARDNESS 1	114	114								
HARDNESS 2			54							
AMMONIA NH3	25	2								
5 MIN. SETT.										
30 MIN. SETT.										
60 MIN. SETT.										
FREE CHLORINE	3.5	.1								
TOTAL CHLORINE	Time		.24	.49	.23					
MLSS	Time	0800 .01	1.91	1.51	1.24					
MLVSS %	0823 .03									
S.V.I.										

Brauns
0711 .24
0713 1.91

Contact
1.64
0742
0745

09.20.2022 13:16

DAILY LAB MAR 2022

Laboratory bench sheets are not properly maintained; there is no indication whether the same technician is both collecting the samples and performing the analysis, no information of which approved EPA method is being utilized for each test, and no usage of units for temperature, alkalinity, and chlorine.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 27

Location: 501 W Wagner Rd		
City: Yukon	County/Parish: Canadian	State: Oklahoma

CITY OF YUKON LAB BENCH SHEET

Veolia Water

DATE 5-1-22
TIME 0700
TEMP 50
Cloud Cover 1
Rainfall _____
Initials GG

1=CLR
2=PT. CLDY
3=CLDY

09-20-2022 13:22

	INF	EFF	TAP PLANT	TAP DIST	POE CL2	AERA BASIN	RAS	WAS	UP STREAM	DOWN STREAM
TIME GRAB	0727	0741	0712	0932	0948	0733				
TIME RUN	0804	0810	0723	0935	0951	0755				
FLOW / GPM	769	846								
PH #1	7.33	7.16	8.64							
PH #2	7.34	7.17	8.65							
TEMPERATURE	19	19	19			20				
DISSOLVED OXY	1	4.46				1.98				
P-ALKALINITY	8		8							
T-ALKALINITY	330	220	150							
CHLORIDE		87								
HARDNESS			50							
CONTACT BASIN		TOTAL								
0734-0739		0.89								
AMMONIA NH3	25	0.1								
5 MIN. SETT.						960				
30 MIN. SETT.						800				
60 MIN. SETT.	4.0	0.1				650				
Time										
FREE CHLORINE			0.24	0.32	0.20					
Time										
TOTAL CHLORINE	0.01	0.01	1.66	1.52	1.79					
MLSS						4618				
MLVSS %						76				

Brown
1000 F 0.24
1003 T 1.68

Laboratory bench sheets are not properly maintained; there is no indication whether the same technician is both collecting the samples and performing the analysis, no information of which approved EPA method is being utilized for each test, and no usage of units for temperature, alkalinity, and chlorine.

Appendix 2

Operator Licenses

Name	State	Licenses	
Gary Giddings	OK	A Waste Water Operator	21927
	OK	A Waste Water Laboratory	21927
	OK	A Water Operator	21927
	OK	A Water Laboratory	21927
	TX	A Waste Water Operator	
	TX	A Water Operator	
Raymond Winters	OK	C Waste Water Operator	96677
	OK	C Waste Water Laboratory	96677
	OK	C Water Operator	96677
	OK	C Water Laboratory	96677
Glen Groves Jr	OK	C Waste Water Operator	104121
	OK	C Water Operator	104121
Eric Smith	OK	D Water Operator	109859
	OK	D WasteWater Operator	109859

Appendix 3
Accurate Environmental Laboratories Reports



September 08, 2022
Client: Veolia Water - Yukon
501 West Wagoner Road
Yukon, OK 73099
Requested By: Gary Giddings



National
Environmental
Laboratory
Accreditation
Program
ODEQ TNI Certified

Sample Project Name: WWTP

Date Samples Received: September 06, 2022 **Time:** 8:15 sample temp upon arrival at lab = 17.80°C

Matrix: Water

Lab Log Numbers: EI06002-01

Work Order: EI06002

Report # EI06002-0908221229

EPA Lab ID#'s: Stillwater OK00092 Tulsa OK00983 OKC OK00129 ICR OK 001

Oklahoma Certification: Stillwater NELAP WasteWater, ODEQ 8316/ Drinking Water, DEQ D9602
NELAP Tulsa WasteWater, ODEQ 9905 / Drinking Water, DEQ D9901
Oklahoma City NELAP WasteWater ODEQ 7202 / Drinking Water, DEQ D9937

Kansas Certification: Stillwater NELAP CERT # E-10219

Method Reference: 40 CFR 136, 141, and 261 Methods for Chemical Analysis of Water and Wastes
EPA-600/4-79-020, March 1983. Test Methods for Evaluating Solid Wastes,
SW-846, Final Update III. Standard Methods 1998 (20th Edition), Standard
Methods 2005 (21st Edition) and Standard Methods 2011 (22nd Edition) for the
Examination of Water and Wastewater.

Analysis Reference: If qualifiers present in "Prep Info" or "Analysis Info", then analysis performed as
follows: @= Tulsa Lab and * = OKC Lab. If no qualifiers present, then analysis
performed at Stillwater Lab.

Accurate Environmental Laboratories certify that the test results performed at the
Stillwater lab meet all requirements of NELAP. Any exceptions to this can be
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Accurate Environmental sampling protocol was followed for any sampling
performed by Accurate Field Services.



September 12, 2022
Client: Veolia Water - Yukon
501 West Wagoner Road
Yukon, OK 73099
Requested By: Gary Giddings



National
Environmental
Laboratory
Accreditation
Program
ODEQ TNI Certified

Sample Project Name: WWTP

Date Samples Received: September 07, 2022 **Time:** 8:00 sample temp upon arrival at lab = 17.20°C

Matrix: Water

Lab Log Numbers: EI07001-01

Work Order: EI07001

Report # EI07001-0912220817

EPA Lab ID#'s: Stillwater OK00092 Tulsa OK00983 OKC OK00129 ICR OK 001

Oklahoma Certification: Stillwater NELAP WasteWater, ODEQ 8316/ Drinking Water, DEQ D9602
NELAP Tulsa WasteWater, ODEQ 9905 / Drinking Water, DEQ D9901
Oklahoma City NELAP WasteWater ODEQ 7202 / Drinking Water, DEQ D9937

Kansas Certification: Stillwater NELAP CERT # E-10219

Method Reference: 40 CFR 136, 141, and 261 Methods for Chemical Analysis of Water and Wastes
EPA-600/4-79-020, March 1983. Test Methods for Evaluating Solid Wastes,
SW-846, Final Update III. Standard Methods 1998 (20th Edition), Standard
Methods 2005 (21st Edition) and Standard Methods 2011 (22nd Edition) for the
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Accurate Environmental sampling protocol was followed for any sampling
performed by Accurate Field Services.



September 16, 2022
Client: Veolia Water - Yukon
501 West Wagoner Road
Yukon, OK 73099
Requested By: Gary Giddings



National
Environmental
Laboratory
Accreditation
Program
ODEQ TNi Certified

Sample Project Name: WWTP

Date Samples Received: September 07, 2022 Time: 14:00 sample temp upon arrival at lab = 4.70°C - On Ice

Matrix: Waste Water Water

Lab Log Numbers: **EI07128-01** **EI07128-02** **EI07128-03** **EI07128-04**
 EI07128-05 **EI07128-06**

Work Order: EI07128

Report # EI07128-0916221025

EPA Lab ID#'s: **Stillwater OK00092 Tulsa OK00983 OKC OK00129 ICR OK 001**

Oklahoma Certification: Stillwater NELAP WasteWater, ODEQ 8316/ Drinking Water, DEQ D9602
NELAP Tulsa WasteWater, ODEQ 9905 / Drinking Water, DEQ D9901
Oklahoma City NELAP WasteWater ODEQ 7202 / Drinking Water, DEQ D9937

Kansas Certification: Stillwater NELAP CERT # E-10219

Method Reference: 40 CFR 136, 141, and 261 Methods for Chemical Analysis of Water and Wastes
EPA-600/4-79-020, March 1983. Test Methods for Evaluating Solid Wastes,
SW-846, Final Update III. Standard Methods 1998 (20th Edition), Standard
Methods 2005 (21st Edition) and Standard Methods 2011 (22nd Edition) for the
Examination of Water and Wastewater.

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performed by Accurate Field Services.



September 14, 2022
Client: Veolia Water - Yukon
501 West Wagoner Road
Yukon, OK 73099
Requested By: Gary Giddings



National
Environmental
Laboratory
Accreditation
Program
ODEQ TNI Certified

Sample Project Name: WWTP

Date Samples Received: September 12, 2022 Time: 8:15 sample temp upon arrival at lab = 13.60°C

Matrix: Water

Lab Log Numbers: EI12002-01

Work Order: EI12002

Report # EI12002-0914221327

EPA Lab ID#'s: Stillwater OK00092 Tulsa OK00983 OKC OK00129 ICR OK 001

Oklahoma Certification: Stillwater NELAP WasteWater, ODEQ 8316/ Drinking Water, DEQ D9602
NELAP Tulsa WasteWater, ODEQ 9905 / Drinking Water, DEQ D9901
Oklahoma City NELAP WasteWater ODEQ 7202 / Drinking Water, DEQ D9937

Kansas Certification: Stillwater NELAP CERT # E-10219

Method Reference: 40 CFR 136, 141, and 261 Methods for Chemical Analysis of Water and Wastes
EPA-600/4-79-020, March 1983. Test Methods for Evaluating Solid Wastes,
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Stillwater lab meet all requirements of NELAP. Any exceptions to this can be
found in the report footer or Quality Control Section of the report.

This report is to only be replicated in its entirety.

Accurate Environmental sampling protocol was followed for any sampling
performed by Accurate Field Services.



September 15, 2022
Client: Veolia Water - Yukon
501 West Wagoner Road
Yukon, OK 73099
Requested By: Gary Giddings



National
Environmental
Laboratory
Accreditation
Program
ODEQ TNI Certified

Sample Project Name: WWTP

Date Samples Received: September 13, 2022 **Time:** 8:00 sample temp upon arrival at lab = 15.10°C

Matrix: Water

Lab Log Numbers: EI13004-01

Work Order: EI13004

Report # EI13004-0915221537

EPA Lab ID#'s: Stillwater OK00092 Tulsa OK00983 OKC OK00129 ICR OK 001

Oklahoma Certification: Stillwater NELAP WasteWater, ODEQ 8316/ Drinking Water, DEQ D9602
NELAP Tulsa WasteWater, ODEQ 9905 / Drinking Water, DEQ D9901
Oklahoma City NELAP WasteWater ODEQ 7202 / Drinking Water, DEQ D9937

Kansas Certification: Stillwater NELAP CERT # E-10219

Method Reference: 40 CFR 136, 141, and 261 Methods for Chemical Analysis of Water and Wastes
EPA-600/4-79-020, March 1983. Test Methods for Evaluating Solid Wastes,
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September 16, 2022
Client: Veolia Water - Yukon
501 West Wagoner Road
Yukon, OK 73099
Requested By: Gary Giddings



National
Environmental
Laboratory
Accreditation
Program
ODEQ TNI Certified

Sample Project Name: WWTP

Date Samples Received: September 08, 2022 **Time:** 12:55 sample temp upon arrival at lab = 17.60°C - On Ice

Matrix: Water

Lab Log Numbers: EI08084-01

Work Order: EI08084

Report # EI08084-0916221036

EPA Lab ID#'s: Stillwater OK00092 Tulsa OK00983 OKC OK00129 ICR OK 001

Oklahoma Certification: Stillwater NELAP WasteWater, ODEQ 8316/ Drinking Water, DEQ D9602
NELAP Tulsa WasteWater, ODEQ 9905 / Drinking Water, DEQ D9901
Oklahoma City NELAP WasteWater ODEQ 7202 / Drinking Water, DEQ D9937

Kansas Certification: Stillwater NELAP CERT # E-10219

Method Reference: 40 CFR 136, 141, and 261 Methods for Chemical Analysis of Water and Wastes
EPA-600/4-79-020, March 1983. Test Methods for Evaluating Solid Wastes,
SW-846, Final Update III. Standard Methods 1998 (20th Edition), Standard
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