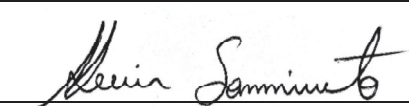


Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Dates:	7/28/2025 and 7/29/2025	
Media Program:	Drinking Water	
Regulatory Program(s)	Safe Drinking Water Act (SDWA)	
Company Name:	Duncan Public Utilities Authority – Public Water System	
Facility Name:	Duncan Public Utilities Authority	
Facility Physical Location:	1104 N Waterplant Rd.	
(city, state, zip code)	Duncan, OK 73533	
Mailing address:	1104 N Waterplant Rd.	
(city, state, zip code)	Duncan, OK 73533	
County/Parish:	Stephens County	
Facility Phone Number	580-467-4202	
Facility Contact:	Karl Holtz kholtz@duncanok.gov	Water/Wastewater Superintendent
FRS Number:	110012874693	
System Classification:	Community Water System (CWS)	
PWSID:	OK1010809	
Personnel participating in the inspection:		
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Kimberly Wirtz	DEQ / kimberly.wirtz@deq.ok.gov	District Representative
EPA Lead Inspector Signature/Date	 Kevin Sarmiento, ERG (EPA Contract Inspector)	9/24/2025 Date
Supervisor Signature/Date	RUBEN ALAYON-GONZALEZ Ruben Alayon-Gonzalez, EPA Region 6, Enforcement and Compliance Assurance Division, Water Resources Section	Digitally signed by RUBEN ALAYON-GONZALEZ Date: 2025.09.25 14:05:20 -05'00' Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

From July 28, 2025 through July 29, 2025, the United States Environmental Protection Agency (EPA) and EPA’s contract inspectors from ERG (referred to as the EPA inspection team) conducted a Compliance Evaluation Inspection under Section 1445 of the Safe Drinking Water Act (SDWA), 42 U.S.C. §300j-4, of Duncan Public Utilities Authority (PUA) Public Water System (PWS), PWS ID No. OK1010809 (System). The purpose of the inspection was to evaluate the System’s compliance with the SDWA as well as other applicable regulations, including Title 252 of the Oklahoma Administrative Code (O.A.C.). EPA notified Karl Holtz of the System via email that an inspection would be conducted on July 28 and 29, 2025. Information regarding the reason and statutory authority for the inspection was discussed with System representatives during the inspection.

This report is based on information supplied by the System representatives through interviews and written statements, observations made by the EPA inspection team, and records and reports maintained by the System. As part of the inspection process, the EPA inspection team made direct observations, took photographs, collected physical evidence, and reviewed relevant documents. Information gathered from EPA, state, and public records before, during, and after the onsite inspection are referenced in this report as applicable.

A Consent Order between the System and the State of Oklahoma Department of Environmental Quality (DEQ) went into effect on April 11, 2025. The consent order was issued in response to non-compliance with Total Organic Carbon (TOC) treatment technique (TT) requirements as well as a May 3, 2024 notice of violation for TTHM maximum contaminant level exceedances, and a June 27, 2023 notice of violation for sanitary deficiencies identified during the June 8-9, 2023 DEQ sanitary survey of the System.

The table below provides a summary of the System’s individual violations prior to the inspection, as identified in the Oklahoma Drinking Water Watch (DWW) database:

Table 1. DWW Individual Violations for Compliance Periods between January 1, 2020, and July 1, 2025 (data pulled on August 22, 2025)					
Analyte Name	Compliance Period Begin Date	Compliance Period End Date	Violation Category	Measurement/ Calculation (e.g., Locational Running Annual Average)	Units
Carbon, Total	12-01-2024	12-31-2024	Treatment Technique	0.90	Ratio
Carbon, Total	09-01-2024	09-30-2024	Treatment Technique	0.88	Ratio
Revised Total Coliform Rule (RTCR)	11-01-2024	11-30-2024	Routine Monitoring of E.Coli	-	-
Disinfection Byproduct Rule	11-01-2024	11-30-2024	Routine Monitoring of Chloramine	-	-
Carbon, Total	08-01-2024	08-31-2024	Routine Monitoring of Raw Total Alkalinity	-	-
Carbon, Total	08-01-2024	08-31-2024	Routine Monitoring of Total Carbon	-	-

Table 1. DWW Individual Violations for Compliance Periods between January 1, 2020, and July 1, 2025 (data pulled on August 22, 2025)					
Analyte Name	Compliance Period Begin Date	Compliance Period End Date	Violation Category	Measurement/ Calculation (e.g., Locational Running Annual Average)	Units
Carbon, Total	08-01-2024	08-31-2024	Routine Monitoring of Raw Water Total Carbon	-	-
Carbon, Total	06-01-2024	06-30-2024	Treatment Technique	0.98	Ratio
Carbon, Total	03-01-2024	03-31-2024	Treatment Technique	0.99	Ratio
Total Trihalomethanes (TTHM)	01-01-2023	03-31-2023	MCL	Locational running annual average 0.081	mg/L
TTHM	04-01-2020	06-30-2020	MCL	Locational running annual average 0.081	mg/L
TTHM	01-01-2020	03-31-2020	MCL	Locational running annual average 0.082	mg/L
TTHM	01-01-2020	03-31-2020	MCL	Locational running annual average 0.083	mg/L
TTHM	01-01-2020	03-31-2020	MCL	Locational running annual average 0.085	mg/L
Carbon, Total	03-01-2020	03-31-2020	Treatment Technique	0.082	Ratio

SYSTEM DESCRIPTION

The System is a community public water system (PWS) as defined by 40 C.F.R., Part 141, Subpart A, located in Stephens County, Oklahoma. According to System-provided information, the System serves approximately 23,000 people through 10,938 service connections. The System is comprised of three source water lakes and a conventional surface water treatment plant (WTP) with two water treatment trains (North and South) and 14 million gallons per day (MGD) combined treatment capacity. The treatment trains combine at a common clearwell with a single entry point location into the distribution system.

The water is gravity-fed into the distribution system most of the year, with pumps available to move additional water during periods of high demand. The System's distribution system is comprised of eight water storage tanks, three pumphouses, and three pressure zones. The total distribution system finished water storage capacity is 12.9 million gallons (MG). Stephen's County Rural Water District #5, PWS ID No. OK2006969, is a consecutive system that receives treated water from the System.

Section II – INSPECTION ACTIVITIES SUMMARY

The EPA inspection team conducted an array of interviews and field activities to discuss and observe the System operations and maintenance (O&M) activities and to assess the condition of the drinking water system assets. The physical inspection occurred over two days. The following subsections describe the inspection activities completed by the EPA inspection team. The System representatives provided documents in response to a document request included in the EPA Region 6 inspection notification email. The information in this report is based on document review, conversations with System representatives, and observations made during this inspection.

OPENING CONFERENCE

The EPA inspection team arrived at the System, located at 1104 N Waterplant Rd., Duncan, OK 73533, at 0830 CDT on July 28, 2025, for the inspection. The EPA inspection team was accompanied by Isaac Sparks, Kimberly Wirtz, and Thomas Nguyen from DEQ; refer to Appendix B for the opening conference sign-in sheet. Daniel Kim and Kevin Sarmiento presented their credentials to Karl Holtz and informed them that this was an EPA Region 6 inspection to determine compliance with the SDWA and O.A.C. requirements. The EPA inspection team also informed the System representatives that they would be conducting a cybersecurity evaluation alongside the SDWA Section 1433 review of the System's Risk and Resilience Assessment (RRA) and Emergency Response Plan (ERP).

The opening conference included a discussion of system details, surface water sources and treatment, and Supervisory Control and Data Acquisition (SCADA). Additional conversations throughout the inspection process included technical, managerial, and financial capacity of the System, monitoring and reporting requirements, cross-connection control, emergency response plan and management, staffing, plans in place for lead and copper rule (LCR), disinfection byproduct rule (DBPR), revised total coliform rule (RTCR), treatment techniques, and others discussed in more detail in the remainder of Section II.

MANAGEMENT AND OPERATION

The System is owned and operated by the City of Duncan. Two of the three source water lakes, Lake Humphreys and Lake Fuqua, are owned and managed by the City of Duncan with the third source, Lake Waurika, owned and managed by the U.S. Army Corp. of Engineers.

Nine licensed operators cover three shifts at the water treatment facility to ensure 24 hours of coverage per day. The facility is classified by DEQ as a Class A facility due to demand and treatment complexity. Routine checks of the distribution system assets, including monitoring chlorine residual and phosphate levels, are completed by distribution staff Monday through Thursday and by treatment operators Friday through Sunday. Chlorine residuals are monitored and recorded at water storage facilities twice per day as required. These residuals are monitored manually as there is no chlorine residual monitoring instrumentation at any of the water storage tanks. The breakdown of operator certification levels are as follows:

- Two operators hold a Class A Water Operator License.
- Three operators hold a Class B Water Operator License.
- One operator holds a Class C Water Operator License.
- Three operators hold a Class D Water Operator License.
- One operator in training is testing for the Class D Water Operator License.

At the time of the inspection, the System was under an active Consent Order for non-compliance with Total Organic Carbon (TOC) treatment technique (TT) violations and construction and operational violations identified during the June 8-9, 2023 sanitary survey inspection of the System conducted by DEQ. The Consent Order required the System to submit a corrective action plan by July 1, 2025, attain compliance with TOC TT requirements by July 1, 2026, and maintain compliance with TOC TT requirements or submit an approvable engineering report proposing a schedule, with actions and dates, for achieving and maintaining compliance. DEQ stated that the system has been in compliance with TOC TT for about a year as of the inspection date. In response to the consent order, System representatives stated that they plan to replace the media in all filters to enhance TOC removal efficiency.

The System does not have a long-term capital improvement plan in place. Capital improvement plans are developed by the System supervisors one year at a time. System representatives stated that to comply with the Consent Order placed by DEQ, the system was planning a capital improvement project to replace the media in all of the filters at the treatment plant to enhance TOC removal efficiency. However, the EPA inspection team did not observe the filter media replacement project in the Systems 2025 Capital Improvement Plan. System representatives stated that it would be included in the 2026 Capital Improvement Plan. The Consent Order requires the System to attain compliance with TOC TT by July 1, 2026.

During the treatment facility walk-through, the EPA inspection team observed abandoned assets that were built, but never implemented or implemented for a short period of time before the System determined that the goal of the project could not be achieved. For example, the EPA inspection team observed an abandoned powdered activated carbon tank and feed system that was built and never implemented due to difficulties discovered after the project's completion and an abandoned peroxide feed building that was built and implemented for a short period before the System realized that it was not providing the results they had planned.

The System relies on local ordinances and building codes for cross-connection control and backflow prevention and does not have a written cross-connection control program in place. System representatives provided a letter from the City of Duncan Plumbing Inspector which states that the City of Duncan has ordinances in place for the prohibition of cross-connections. System representative said that backflow prevention on fire suppression systems was inspected annually by certified contractors in compliance with NFPA standards, and these reports are typically submitted to the Duncan Fire Department. System representative also mentioned that the Duncan Fire Department conducted annual inspections of fire risers in commercial buildings, and buildings within the city limits that contain hazardous chemicals were inspected annually by Code Enforcement and/or during the Duncan Wastewater Plant's Industrial Pretreatment Program (IPP) inspections. However, at the time of the inspection, the EPA inspection team observed threaded hose bibs throughout the System's facilities that were not equipped with a hose bib vacuum breaker.

The System has 186 identified dead-ends that are flushed on a quarterly basis, according to the System's Flushing Program Plan and System representatives. The System relies on the Duncan Fire Department to flush the rest of the distribution system. System representatives stated that the Fire Department does not sample for chlorine residual while flushing and does not share flushing records with the System.

The System has a list of 56 valves that are exercised annually. System representatives stated that the list includes valves inside and outside of their facility fence line but that they have no records of valve exercising activities.

System representatives stated that they do not have an asset or maintenance management system. They stated that the City of Duncan's finance department keeps a record of assets purchased on Excel, but that it is not managed or updated by the System.

System representatives stated that DEQ developed a Source Water Assessment Plan for the System, but that that they have not implemented any of the recommendations included in the assessment.

The System does not have a finished water storage tank cleaning and inspection schedule or tank inspection reports for any of their finished water storage tanks. System representatives stated that the last record of a tank inspection was from 1971. Violation 4.11 in the Consent Order stated that due to a lack of documentation such as maintenance records or inspection reports, the condition of the hatches, vents, roofs, and interiors of the finished water storage tanks could not be verified. The Consent Order required the System to correct the violation as stated in the approved corrective action plan (CAP) by July 1, 2025. The System's August 12, 2024 CAP stated that inspections of the interior and exterior of finished water storage tanks would be carried out in 2024. However, at the time of the EPA inspection, System representatives stated that they were in the process of contracting a third-party tank inspection company to conduct inspections of the System's eight tanks.

DOCUMENT REVIEW

The EPA inspection team requested documents from the System prior to and throughout the inspection process. Following the opening conference of the inspection, the EPA inspection team inquired about the technical, managerial, and financial capacity of the System. Programmatic topics followed, including a review of monitoring and reporting requirements, such as monthly operating reports, Revised Total Coliform Rule (RTCR) Sample Siting Plan, Disinfection Byproduct Rule (DBPR), Lead and Copper Rule (LCR) – Revisions (LCRR), and Improvements (LCRI), Per- and polyfluoroalkyl substance (PFAS) sampling requirements, and Unregulated Contaminant Monitoring Rule (UCMR) sampling results, inorganics, volatile and semi-volatile organic chemicals, and radiological monitoring. The System representatives described their annual development of the Consumer Confidence Report.

The System does not have a written sampling plan for compliance sampling for the DBPR. System representatives produced a spreadsheet for review that contained sampling locations, individual sample site results per quarter, and the locational running annual average of the sites per quarter. However, the System's Flushing Program Plan states that their quarterly sampling plan includes hydrant flushing near DBP sample sites "immediately prior" to the quarterly sample dates. System representatives stated that they flush hydrants at the DBP sample sites the day before DBP compliance sampling.

The System's Lead and Copper Sampling Plan consists of a DEQ list of 61 sites, all classified as tier 1 sites. System representatives stated that they were required to submit 30 samples, and had a buffer of 31 extra sites. The Systems Lead Service Line Inventory (LSLI) states that the System has 10,938 service connections, all with unknown service line materials on both the System and customer side. System representatives stated that a contractor has been hired to conduct the system's LSLI, and once this inventory is complete, the system will have a clearer understanding of its service lines. Consequently, the system has decided that, until then, all lines will be considered unknown and assumed to contain lead unless proven otherwise.

The EPA inspection team reviewed the System's Section 1433 Risk and Resilience Assessment and Emergency Response Plan. The EPA inspection team also reviewed the System's cybersecurity practices.

FACILITY WALKTHROUGH

The EPA inspection team conducted an array of field activities to evaluate the drinking water system, including inspecting the WTP, Lake Humphreys intake, finished water storage tanks, and pressure booster stations. The physical inspection occurred over two days.

The following descriptions are based on information provided to the EPA inspection team by the System and observations made during the inspection. Areas of concern and observations are described in Section III of this report.

Duncan WTP

The Duncan WTP receives surface water from Lake Waurika, Lake Humphreys, and Lake Fuqua. Lake Waurika is owned and managed by the U.S. Army Corp of Engineers, and serves as a source of water for various other major cities as part of the Waurika Master Conservancy District, while Lake Humphreys and Lake Fuqua are owned and managed by the City of Duncan. Potassium permanganate is fed at the Lake Humphreys intake for taste and odor control and copper sulfate is fed at the Lake Waurika intake for zebra mussel control. The WTP is a conventional coagulation, flocculation, clarification, and multi-media filtration plant with two parallel treatment trains, North Plant and South Plant. Aluminum chlorohydrate coagulant (ACH) and polymer flocculant are fed at the rapid mix. The System relies on free chlorine disinfection after clarification for CT and inactivation of microorganisms. Filtered water from the North and South Plants is dosed with ammonia before flowing into the 3.5 MG clearwell. The System relies on chloramines as its principle residual disinfectant to combat DBPs. However, the System does not receive CT credits for the 3.5 MG Clearwell because DEQ does not recognize chloramines for CT.

The System feeds orthophosphate as a corrosion control inhibitor, and caustic soda to increase pH to a target range of 8.0 to 8.10 just prior to the 3.5 MG clearwell. Filter backwash wastewater and clarifier sludge are stored in sludge ponds and recycled to the raw water header.

The EPA inspection team conducted a walkthrough of the WTP, including the North and South treatment trains. The North treatment train was offline during the inspection, so the EPA inspection team focused on observing the assets that were in operation at the time of the inspection.

Duncan WTP - Backwash Supply Tank

The backwash supply tank stores finished water used for filter backwashing and supplies potable water to the facility.

The EPA inspection team observed the following conditions:

- The metal flapper did not create an adequate seal around the tank overflow line's outlet (Photograph 1).
- A missing seal between the tank ring and concrete foundation exposed gaps extending 17 in. beneath the tank's base in one area (Photograph 2).
- The tank lacked a drain line, requiring a full plant shutdown to perform draining operations.
- Paint was peeling in several areas around the tank (Photograph 3).

- The System did not provide inspection records to confirm when the tank last underwent a comprehensive cleaning and inspection.

Duncan WTP – South Flash Mixer

ACH and polymer are drip fed into a mechanical flash mixer at the head of the South Plant's treatment process.

The EPA inspection team observed the following conditions:

- The interior chamber of the flash mixer showed concrete erosion in the northwest corner, directly below the ACH and polymer injection point. (Photograph 4).
- Cracked concrete was present near the base of the flash mix tank on the exterior northwest corner, directly adjacent to the ACH and polymer injection point (Photograph 5).
- The ACH and polymer feed lines were mislabeled (Photograph 5).

Duncan WTP – Powdered Activated Carbon Hopper

System representatives stated that the System designed and constructed a powdered activated carbon (PAC) hopper to add PAC to raw water for total organic carbon (TOC) removal. After completing the installation, they determined that the hopper did not provide sufficient feed or capacity and subsequently abandoned the project (Photograph 6).

Duncan WTP – South Plant Clarifiers

The South Plant includes three solids contact clarifiers: two 222,000-gallon clarifiers and one 467,000-gallon clarifier. At the time of inspection, the two smaller clarifiers were offline due to lower-than-normal summertime water demand. System representatives stated that a sludge judge is used to obtain grab samples of the clarifier to determine treatment process effectiveness.

Duncan WTP – South Plant Filter Building

The South Plant has six multimedia filters. System representatives stated that filter operators backwash filters based on a 72-hour runtime or filtered water parameters, such as a headloss greater than 7 ft. or an individual filter effluent of 0.3 NTU or greater. The on-duty operator receives an alarm from the SCADA system if the individual filter effluent for any filter reaches 0.28 NTU. If the individual filter effluent reaches 0.3 NTU, the operator manually removes the filter from operation and performs a backwash.

The automatic filter backwash procedure consists of a low-rate backwash with air scouring, followed by a high-rate backwash without air scouring (Photograph 7). The EPA inspection team observed corrosion on the stainless-steel air scour piping on filters 5 and 6 (Photograph 8). System representatives stated that each filter automatically filters to waste for 10 minutes after backwashing before an operator can manually return it online. All backwash wastewater is discharged into the backwash recycle ponds.

The EPA inspection team observed filters 3 and 4 offline with all media removed. System representatives explained that filter 3 had been offline for "a few years" due to a leak, while filter 4 had been offline since 2016 due to a leaking effluent valve. System representatives stated that those filters were not needed for capacity since filters 1 and 2 could handle the demand.

The EPA inspection team observed hose bibs without vacuum breakers in the filter rooms (Photograph 9 and Photograph 10).

Duncan WTP – Backwash Recycle Ponds

The System operates four backwash recycle ponds in series. Recycled water flows into the farthest pond first and then continues through the remaining ponds in sequence. Operators manually initiate pumping from the final pond back to the head of the treatment process based on pond level. System representatives stated that the recycle water injection point is located downstream of the raw water monitoring location, but that operators collect grab samples to determine combined raw water quality when recycling backwash water. The EPA inspection team reviewed the System's daily shift report and noted that operators record when the recycle pond pumps are on (Photograph 11).

Duncan WTP – South Plant Filter Pipe Galley and 0.5 MG Clearwell

The South Plant Filter Pipe Galley is located on the lower level of the South Plant Filter Building and directly above a 0.5 MG clearwell. The South Plant has a separate 0.5-MG clearwell fed by the South filters before feeding into the shared 3.5-MG clearwell.

The EPA inspection team observed the following conditions:

- Stored paint was located in the pipe gallery, adjacent to an access hatch to the 0.5-MG clearwell (Photograph 12).
- One corroded and two completely torn screens were present on the 0.5-MG clearwell's air vents (Photograph 13 and Photograph 14).
- A clearwell sampling line passed through an unprotected opening in the floor of the filter gallery, leading directly to the interior of the South clearwell below (Photograph 15 and Photograph 16).
- A crack on the exterior wall of the South Filter Building, adjacent to filter 6, was actively leaking (Photograph 17 and Photograph 18).

Duncan WTP – Chlorination Pit and Caustic Feed Pit

The chlorination pit serves as the feed point for chlorine and orthophosphate after filtration, before finished water enters the 3.5 MG clearwell. The EPA inspection team did not observe a gasket seal around the post chlorination pit access hatch lid (Photograph 19).

The caustic feed pit functions as the caustic soda dosing point and the pre-clearwell chlorine sample location. The EPA inspection team observed a broken electrical conduit on the side of the pit, which exposed electrical wires to the elements (Photograph 20).

Duncan WTP – Ammonia Feed Room

The EPA inspection team noted a pungent smell in the Ammonia Feed Room despite the use of ventilation fans, making occupancy difficult even for short periods. System representatives stated that the feed room was built in 2007 and has experienced constant ammonia leaks since then. Operators enter the feed room to conduct work, but System representatives stated that some operators avoid entering the feed room and obtain dosing meter readings from the outside. The EPA inspection team observed that the GASTECH leak detector and alarm in the ammonia feed room was turned off

(Photograph 21). System representatives stated that the alarm remains off because it would otherwise ring throughout the day.

Duncan WTP – Ammonia Storage Room

The Ammonia Storage Room is located adjacent to the Ammonia Feed Room and contains a bulk pressure tank of anhydrous ammonia.

The EPA inspection team observed the following conditions:

- Eleven full 55-gallon drums of hydrochloric acid and one drum of phosphate lacked secondary spill containment (Photograph 22). Some hydrochloric acid drums were visibly bulging from pressure build-up (Photograph 23).
- The room contained 55-gallon drums of hydrochloric acid (Photograph 24), 55-gallon drums of phosphate (Brenphos 100 NSF) (Photograph 25), individual anhydrous ammonia cylinders and a large bulk storage tank of anhydrous ammonia (Photograph 26 and Photograph 27), and a propane cylinder (Photograph 28). System representatives stated that these chemicals have been stored in the room for approximately three years and will not be used again in the treatment process, except for the bulk anhydrous ammonia storage tank.
- Seven ammonia pressure tanks were improperly chained, secured only with a single chain tied loosely around the necks of the tanks and a single pillar in the storage room (Photograph 26).
- One propane tank and one ammonia tank were not chained (Photograph 28 and Photograph 29). System representatives stated that they were uncertain if the tanks were empty.
- Floor drains in the room discharged directly to the recycle ponds (Photograph 30).
- No chemical placard was present to identify potential hazards in the ammonia storage room (Photograph 31).
- The door to the ammonia storage room lacked a locking mechanism (Photograph 31).

Duncan WTP – 3.5-MG Combined Clearwell

The 3.5 MG clearwell is a buried concrete tank that receives finished water from the North and South Plants. Three high service pumps and a filter backwash pump are installed on top of the clearwell's northern edge.

The EPA inspection team observed the following conditions:

- A clearwell access hatch lacked a gasketed seal around the hatch cover (Photograph 32 and Photograph 33). System representatives stated that all three clearwell access hatches had the same design and were also missing gasketed seals.
- Cracking was present on the concrete clearwell lid, with exposed rebar visible in some areas. (Photograph 34).
- A roof-mounted device located on top of the clearwell was not properly sealed, allowing direct access to the clearwell below (Photograph 35 and Photograph 36).
- Pooling water and vegetation growth were present around the high service pumps and backwash supply tank located directly on top of the clearwell. Openings around the pump frames provided potential access to the clearwell below (Photograph 37 and Photograph 38).

Duncan WTP – Polyphosphate Storage, Feed, and Monitoring Instrumentation Building

The System uses inline pH, chlorine, and turbidity instrumentation to monitor clearwell influent, post-clearwell water, and distribution system entry point water in this building. The building also houses the polyphosphate storage and feed system.

The EPA inspection team observed the following conditions:

- Feed pumps were manually controlled and not flow-paced.
- The polyphosphate storage room contained drums of both polyphosphate and orthophosphate (Photograph 39). System representatives explained that both chemicals are fed separately and not blended in the day tank. This room also contained drums of polymer.
- Drums of 12.5 percent sodium hypochlorite and a single drum of 23 percent hydrofluorosilicic acid were stored in the polyphosphate storage room (Photograph 40, Photograph 41, Photograph 42, Photograph 43). System representatives stated that sodium hypochlorite is used for disinfecting groundwater when wells are in use, and that hydrofluorosilicic acid was purchased for fluoridation, but never implemented.
- No secondary spill containment was present between incompatible chemicals, such as sodium hypochlorite and hydrofluorosilicic acid, stored in the same room (Photograph 40).

Duncan WTP – ACH and Caustic Soda Chemical Building

The System operates two 9,000-gallon bulk storage tanks for aluminum chlorohydrate coagulant (ACH) and one for caustic soda. System representatives explained that 4,000-gallon orders are placed when a tank reaches approximately half capacity. However, the EPA inspection observed a tape measure on sides of the ACH and caustic soda fiberglass tanks; however, were unable to easily determine the level in the tanks. System representatives stated that they rely on visual inspection through the fiberglass tanks under appropriate lighting to determine fill levels (Photograph 44).

The EPA inspection team also observed that the delivery truck connection site, on the exterior wall of the chemical building, lacked secondary containment in the event of a leak between the transfer hose and cam-lock connection during chemical delivery (Photograph 45).

The EPA inspection team observed a garden hose connected to a hose bib without a vacuum breaker (Photograph 46).

Duncan WTP – Chlorine Gas Storage and Feed Rooms

The System uses chlorine gas as its primary disinfectant and can store up to 13 1-ton chlorine gas cylinders in the chlorine storage room. System representatives explained that two people must be present when changing an empty cylinder, but stated that no written procedures exist for handling or changing cylinders.

When asked about testing the chlorine leak detection alarm, System representatives stated that the alarm is triggered each time a cylinder is exchanged due to small leaks that occur during the process. The EPA inspection team observed that the chlorine sensor indicator in the adjacent chlorine feed room was not clearly labeled to distinguish between the feed room and storage room sensors (Photograph 47).

The chlorine gas feed room housed three pumps for dosing pre- and post-chlorine, along with one additional pump for redundancy. The EPA inspection team observed a lack of backflow prevention on the potable water line used for chlorine carrier water (Photograph 48).

Duncan WTP – Polymer Storage and Feed Room

A 330-gallon IBC tote of UltraFloc 322HV polymer is housed on top of a spill containment pallet in the storage and feed room. Two feed pumps, one for the North and one for the South Plant, connect directly to the polymer IBC tote. The EPA inspection team observed a lack of spill containment directly below the piping of the IBC tote, where spills are most likely to occur (Photograph 49).

The System uses the facility's potable water supply as carrier water for the polymer feed. The EPA inspection team observed a backflow prevention device on the carrier water supply line, but System representatives stated that it was not tested annually.

The EPA inspection team observed a garden hose connected to a hose bib without a vacuum breaker (Photograph 50).

Duncan WTP – SCADA

System representatives provided an overview of the SCADA system, including filter trending and alarm setpoints. They stated that trends update every 10 minutes. System representatives also stated that SCADA does not have programming to automatically shut down any part of the treatment process based on high or low setpoints, including automatic isolation of a filter when an NTU exceedance occurs.

The EPA inspection team observed the high and low chlorine dose alarm setpoints for the clearwell influent at 5.0 ppm and 2.5 ppm, and for the clearwell effluent at 5.0 ppm and 0.0 ppm, and for the entry point to distribution (EPTD) at 5.0 ppm and 2.2 ppm. System representatives stated that their chlorine goal for the clearwell influent was 0.5 ppm and 3.8 to 4.0 ppm for the EPTD. The SCADA alarms had not been updated to reflect the new chlorine targets implemented by the System.

Duncan WTP – Laboratory

An in-house water quality laboratory is maintained and used primarily for water quality verification. System staff perform and record quality assurance and quality control checks, as well as laboratory instrumentation calibrations, in-house. The EPA inspection team observed one pH 10 buffer solution that had expired, but all other buffers and reagents used on laboratory equipment were current and within date range.

Lake Humphreys Intake

The Lake Humphreys raw water intake is an unscreened, open gate, multi-level intake structure located on the southeastern corner of Lake Humphreys. The EPA inspection team did not observe any protection or signage around the raw water intake. System representatives stated that the lake is used recreationally, with no restrictions for motorized boats or other activities. They also stated that no water quality monitoring occurs at the intake, and that the only monitoring consists of a U.S. Geological Survey lake level and rain gauge.

Humphreys Pumphouse and Sodium Permanganate Storage and Feed Room

The Humphreys Pumphouse contains four raw water pumps that convey water approximately 5 miles south to the Duncan WTP. None of the raw water pumps were operating at the time of the EPA inspection. System representatives stated that they typically avoid using water from Lake Humphreys and Lake Fuqua during the summer months to conserve lake levels, relying instead on Lake Waurika. The EPA inspection team observed a leak around the pump seal of Pump 2 (Photograph 51).

The System uses 20 percent sodium permanganate for taste and order control of both the Lake Humphreys and Lake Fuqua source waters. Raw water from Lake Fuqua, located approximately 11.5 miles east of the Lake Humphreys Pumphouse, is pumped to the Lake Humphreys Pumphouse and dosed with permanganate. The EPA inspection team observed 55-gallon drums of sodium permanganate in the permanganate storage room without secondary spill containment (Photograph 52). System representatives explained that sodium permanganate is transferred from the 55-gallon drums to the day tank using a hand operated transfer pump. The EPA inspection team observed sodium permanganate residue on the walls and floor around the day tank (Photograph 53).

El Rancho Tower

At the time of the EPA inspection, the System was actively constructing a new 1 MG tower at the site of the existing, and still active, 2-MG El Rancho Tower. The EPA inspection team observed multiple hoses without backflow prevention devices connected directly to the fire hydrant next to the tower under construction (Photograph 54 and Photograph 55).

At the existing 2MG El Rancho Tower, the EPA inspection team observed the following conditions:

- An inspection sticker on the side of the tank indicated that the tank was inspected and cleaned in 2014. However, the System did not have any inspection records from the company that performed the work (Photograph 56).
- The perimeter security fencing had vegetation growth throughout (Photograph 57).
- A metal flapper on the end of the overflow line did not create an adequate seal around the overflow outlet (Photograph 58).
- A tank drain was not apparent, and System representatives stated that they are not aware of the existence of a drain line.
- Large gaps were present between the tank's metal foundation and the concrete tank pad, along with vegetation growth around the foundation (Photograph 59).

10th and Elk Pumphouse

The 10th and Elk Pumphouse houses three booster pumps that push water from distribution zone 1 to zone 2.

The EPA inspection team observed the following conditions:

- An air relief valve lacked a 24-mesh corrosion-resistant screen on the end of the down-turned pipe (Photograph 60).
- A pressure of 4.8 pounds per square inch (psi) was recorded on the suction side of the booster pump. (Photograph 61). According to system representatives, the combined pressure from the booster pump and the elevation of the tank typically provide an average of 54 psi to the system.

10th and Elk Tanks

The 10th and Elk site has three finished water storage tanks, the 1MG South Tank that was built in 1921, the 2MG Northwest Tank that was built in 1949, and the 2MG Northeast Tank that was built in 1956. All three tanks are hydraulically connected and float on distribution pressure in zone 1.

The EPA inspection team observed the following conditions:

- Vegetation growth and large shrub roots were present around the foundations of each tank (Photograph 62, Photograph 63 and Photograph 64).
- All three tanks were equipped with metal overflow flappers that did not create adequate seals around the overflow discharge pipes (Photograph 65, Photograph 66, and Photograph 67).
- Corrosion was present on the surface and the top ledge of the South Tank (Photograph 68 and Photograph 69).
- Paint and coating was thinning and peeling at the N.E Tank (Photograph 70) N.W. Tank (Photograph 71).

North Industrial Tower #1 (West)

The EPA inspection team and System Representatives attempted to access the North Industrial Tower (West), but the access gate and property (privately owned) were blocked, and no one was available at the gate to provide access (Photograph 72). System representatives stated that access is typically granted by someone at the gate, but they do not have independent access. They also stated that the tower has been out of service and isolated from the system for 12 to 15 years due to a substantial leak.

North Industrial Tower #2 (East)

The North Industrial Tower (East) is a 0.2 MG tank built in 1989.

The EPA inspection team observed the following conditions:

- Vegetation growth was present around the perimeter fencing (Photograph 73).
- Peeling paint and corrosion were present on the tank anchor bolts (Photograph 74).
- The metal overflow flapper did not create an adequate seal around the overflow outlet (Photograph 75).

Northwest Sector Tower

The Northwest Sector Tower is a 2 MG tank built in 2010. The EPA inspection team observed a threaded hose tap without a hose bib vacuum breaker at the tower (Photograph 76).

North Highway 81 Pumphouse

The North Highway 81 Pumphouse is equipped with two booster pumps. Violation 4.8 in the Consent Order stated that the pump station did not have a discharge measuring device. The EPA inspection team observed pressure gauges on the suction and discharge pipes and a flow meter on the booster discharge. The suction side read 60 psi, and the discharge side read 80 psi, at the time of the inspection. However, the EPA inspection team did not see proper signage on the perimeter fencing of the facility (Photograph 77).

CLOSING CONFERENCE

The EPA inspection team held a closing conference with System personnel at 1600 on July 29, 2025, at the Duncan WTP conference room. The EPA inspection team discussed preliminary observations identified during the field component of the inspection. The EPA inspection team reiterated to the System representatives that these preliminary observations were not compliance determinations.

Preliminary observations shared during the closing conference are subject to further investigation by EPA upon the review of additional records and documentation. Therefore, this inspection report may include observations that were not identified at the time of the closing conference. Observations are described in Section III. Observations regarding the risk and resiliency assessment, emergency response plan, and cybersecurity practices were shared with the System verbally.

The inspection concluded at approximately 1630.

A sign-in sheet for the closing conference is provided in Appendix B.

Section III – AREA OF CONCERN

SDWA Section 1433(a): *SDWA Section 1433(a)(1)(A) requires a CWS serving more than 3,300 persons to conduct a Risk and Resilience Assessment (“RRA”) of its system, including an assessment of:*

- i. the risk to the system from malevolent acts and natural hazards;*
- ii. the resilience of the pipes and constructed conveyances, physical barriers, source water, water collection and intake, pretreatment, treatment, storage and distribution facilities, electronic, computer, or other automated systems (including the security of such systems) which are utilized by the system;*
- iii. the monitoring practices of the system;*
- iv. the financial infrastructure of the system;*
- v. the use, storage, or handling of various chemicals by the system; and*
- vi. The operation and maintenance of the system.*

Section 1433(a)(3)(A) of the SDWA required a CWS serving greater than 3,300 but less than 50,000 persons to submit its certification to the EPA Administrator that it has conducted its RRA on or before June 30, 2021, and at least once every five years after the initial applicable deadline.

Area of Concern 1. On July 29, 2025, EPA completed an inspection of Duncan Public Utilities Authority under SDWA Section 1445, 42 U.S.C. §300j-4. EPA inspectors requested to review the system’s RRA pursuant to SDWA Section 1433, and observed the following:

- a. The document was available at the time of the inspection.
- b. The RRA was dated to show that it was not completed before the date of the certification of completion.
- c. The RRA failed to assess all required elements of SDWA Section 1433(a). The RRA is missing the required elements:
 - Section 1433 (a)(1)(A)(ii) the resilience of the pipes and constructed conveyances, physical barriers, source water, water collection and intake, pretreatment, treatment, storage and distribution facilities, electronic, computer, or other automated systems (including the security of such systems) which are utilized by the system;
 - Section 1433 (a)(1)(A)(iii) the monitoring practices of the system;
 - Section 1433 (a)(1)(A)(iv) the financial infrastructure of the system;

- Section 1433 (a)(1)(A)(v) the use, storage, or handling of various chemicals by the system; and
- Section 1433 (a)(1)(A)(vi) the operation and maintenance of the system.
- d. The RRA did not include a complete assessment of Section 1433 (a)(1)(A)(i) the risk to the system from malevolent acts and natural hazards.

SDWA Section 1433(b): Section 1433(b) of the SDWA requires a CWS serving a population greater than 3,300 to prepare or revise, where necessary, an emergency response plan (“ERP”) that incorporates the findings of the RRA no later than six months after completion of its RRA. The ERP shall include:

1. strategies and resources to improve the resilience of the system, including the physical security and cybersecurity of the system;
2. plans and procedures that can be implemented, and identification of equipment that can be utilized, in the event of a malevolent act or natural hazard that threatens the ability of the CWS to deliver safe drinking water;
3. actions, procedures, and equipment which can obviate or significantly lessen the impact of a malevolent act or natural hazard on the public health and the safety and supply of drinking water provided to communities and individuals, including the development of alternative source water options, relocation of water intakes, and construction of flood protection barriers; and
4. Strategies that can be used to aid in the detection of malevolent acts or natural hazards that threaten the security or resilience of the system.

Area of Concern 2. During the inspection, EPA inspectors also reviewed the System’s ERP pursuant to SDWA Section 1433 and observed the following:

- a. The EPA certified 2021 ERP was not available at the time of the inspection. However, an updated uncertified ERP dated November 16, 2023 was available at the time of the inspection.
 - b. The ERP was dated to show that it was not completed before the date of the certification of completion.
 - c. The ERP included all required elements of Section 1433(b).
 - d. The ERP contained incomplete sections covering the requirements in:
 - SDWA Section 1433(b)(1) strategies and resources to improve the resilience of the system, including the physical security and cybersecurity of the system;
 - SDWA Section 1433(b)(2) plans and procedures that can be implemented, and identification of equipment that can be utilized, in the event of a malevolent act or natural hazard that threatens the ability of the CWS to deliver safe drinking water;
 - SDWA Section 1433(b)(3) actions, procedures, and equipment which can obviate or significantly lessen the impact of a malevolent act or natural hazard on the public health and the safety and supply of drinking water provided to communities and individuals, including the development of alternative source water options, relocation of water intakes, and construction of flood protection barriers; and
 - SDWA Section 1433(b)(4) strategies that can be used to aid in the detection of malevolent acts or natural hazards that threaten the security or resilience of the system.
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OAC 252:626-5-13. “Disinfect all wells, pipes, tanks, and equipment that can convey or store potable water in accordance with AWWA standard specifications prior to being placed into service. Plans or specifications must outline the procedure and include the disinfectant dosage, contact time, residual and method of testing.”

Area of Concern 3. System representatives stated that they did not have written procedures for disinfecting water mains after repairing or installing new pipes. System representatives stated that their verbal procedure was to spray lines with High Test Hypochlorite (HTH) powder mixed with water but they did not conduct any testing of chlorine residuals afterward.

OAC 252:626-19-1(e) “Locate air relief valves at high points in lines where air can accumulate. Do not use automatic air-relief valves where flooding of the valve exhaust may occur. Locate sufficiently sized blow-offs at low points of large mains to effectively remove accumulated sediments. Extend the open end of the exhaust line from automatic valves to at least 1 foot above grade and terminate with a screened, downward-facing elbow. Do not connect air reliefs or blow-offs directly to any sewer.”

Area of Concern 4. The EPA inspection team observed unscreened air relief valves on the suction and discharge sides of the booster pumps at the 10th and Elk Pumphouse (Photograph 60).

OAC 252:626-11-3. (g)(2) “Separate the chemical storage rooms from the feed machine room. Liquid chemicals may be stored in the feed machine rooms where containment for spills is provided.”

OAC 252:626-11-3. (g)(4)(B) “Provide liquid chemical storage tanks with an overflow and a receiving basin or drain capable of receiving accidental spills or overflows.”

Area of Concern 5. The EPA inspection team observed a lack of secondary spill containment for hydrochloric acid and phosphate drums in the ammonia storage room (Photograph 22, Photograph 24, and Photograph 25). A floor drain was present in the ammonia storage room and System representatives stated that it discharged into the backwash ponds (Photograph 30).

Area of Concern 6. The EPA inspection team observed 55-gallon drums of sodium permanganate without secondary containment at the Lake Humphreys sodium permanganate feed room with permanganate residue on the walls and floor around the day tank (Photograph 52 and Photograph 53).

Area of Concern 7. The EPA inspection team observed a lack of spill containment directly below the piping of the UltraFloc 322HV polymer IBC tote in the polymer room (Photograph 49).

OAC 252:626-11-1. (3)(D) “General equipment design must ensure that incompatible chemicals are not fed, stored, handled, or disposed of together.”

Area of Concern 8. The EPA inspection team observed 55-gallon drums of hydrochloric acid (a compatibility group I chemical – acids) (Photograph 22 and Photograph 24), 55-gallon phosphate drums (a compatibility group III chemical – salts & polymer) (Photograph 22 and Photograph 25), and compressed gas cylinders of anhydrous ammonia and propane (compatibility group VI chemicals – compressed gases) in the ammonia storage room (Photograph 26, Photograph 27, and Photograph 28).

- Area of Concern 9.** The EPA inspection team observed 55-gallon drums of 12.5 percent sodium hypochlorite (a compatibility group II chemical – base), 55-gallon drums of polyphosphate and orthophosphate (a compatibility group III chemicals – salts & polymer), and a single drum of 23 percent hydrofluorosilicic acid (a compatibility group I chemical – acid) stored in the same containment space in the polyphosphate storage room (Photograph 39, Photograph 40, Photograph 41, Photograph 42).
- Area of Concern 10.** The EPA inspection team observed one 8,000-gallon bulk tanks of caustic soda (a compatibility group II chemical – base) and two 8,000-gallon bulk tanks of ACH (a compatibility group III chemicals – salts & polymer) located in the same storage room with a common spill drain.

OAC 252:626-11-3. (g)(4)(A) “Provide liquid chemical storage tanks with a device to measure the liquid level in the tank.”

- Area of Concern 11.** The EPA inspection team observed no level measurement devices on the ACH and Polymer chemical storage tanks at the Duncan WTP. System representatives stated that they use sunlight to try to observe the liquid level in each tank (Photograph 44).

OAC 252:626-11-1. (2)(C) “Include points of application to meet the following: provide maximum safety to operators[.]”

OAC 252:626-3-7. (c)(6)(K) “Specifications must provide for an Operation and Maintenance (O & M) Manual for the operation and maintenance of the public water supply system. The O & M Manual shall include at a minimum: Safety

- Area of Concern 12.** The system does not have a written procedure or SOP for the safe handling and exchange of one-ton chlorine gas cylinders to ensure operator safety.

OAC 252:626-17-1. (k) “Make the roof and side walls of all structures watertight with no openings except properly constructed vents, manholes, overflows, risers, drains, pump mountings, control ports, and piping for inflow and outflow.”

OAC 252:626-17-2. (b) Clearwell. “In addition to the requirements of OAC 252:626-17-1 (a) - (c) and (f) - (r), the following requirements shall apply to clearwells: ... (3) Do not locate the clear well under any part of a building where contamination is probable. (4) Do not allow a common wall with any basin holding untreated water.”

- Area of Concern 13.** The EPA inspection team observed an unprotected opening on the roof of the 0.5 MG Clearwell, through which the clearwell sample pump pulls from the underground clearwell (Photograph 15 and Photograph 16). The roof of the clearwell is located inside the South Plant filter pipe gallery. Water and other fluids on the ground in the South Plant filter pipe gallery can enter the clearwell through the unprotected opening.
- Area of Concern 14.** The EPA inspection team observed stored paints and industrial enamel without spill containment in the South Plant Filter Gallery (Photograph 12).
- Area of Concern 15.** The EPA inspection team observed an unprotected opening around a control port on the roof of the 3.5 MG Clearwell (Photograph 35).

- Area of Concern 16.** The EPA inspection team observed cracked concrete with exposed rebar around the roof access hatch of the 3.5 MG Clearwell (Photograph 34).
- Area of Concern 17.** The EPA inspection team observed pooled water and vegetation growth on the 3.5 MG Clearwell, around the high service pumps, located directly on top of the clearwell. Openings around the pump frames provided potential access to the clearwell below (Photograph 37 and Photograph 38).
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OAC 252:626-17-1. (j)(4) “Vent all finished water storage structures. Overflows are not considered vents. Open construction between the side wall and roof is not allowed. Design of vents must: be covered with a 24 mesh corrosion resistant screen installed at a location least susceptible to vandalism.”

- Area of Concern 18.** The EPA inspection team observed torn and corroded vent screens on the South 0.5 MG Clearwell. Two of the three screens were torn, leaving no protection, and the third screen was heavily corroded but still intact (Photograph 13 and Photograph 14).
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OAC 252:626-17-1. (i)(3) states that finished water storage tank accesses must “be fitted with a solid watertight cover.”

- Area of Concern 19.** The EPA inspection team observed no gaskets on the access hatches to the post chlorination pit and 3.5 MG Clearwell (Photograph 19, Photograph 32, and Photograph 33). Both access hatches provide access to finished water.
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OAC 252:626-17-1. (h)(3) “Equip the ends of the pipes with flex gates.”

Recommended Standards for Water Works, 2022 Edition, 7.1.7(c) “The overflow shall open downward and be screened with twenty-four mesh non-corrodible screen. The screen shall be installed within the overflow pipe at a location least susceptible to damage by vandalism. A mesh-fitted mechanical flap valve is acceptable provided the flapper is supplied with non-corroding and non-seizing hinges. The flap valve shall be spring loaded or counterweighted, so it closes and forms a tight seal after the overflow event.”

Recommended Standards for Water Works, 2022 Edition, 7.1.7(d) “When a solid flapper is used, a screen shall be provided inside the overflow. If a duckbill valve is used, a screen is not required. Provisions must be included to prevent the flapper or duckbill from freezing shut.”

- Area of Concern 20.** The EPA inspection team observed solid metal flappers on the overflows of all the finished water storage tanks. The solid flappers did not form a tight seal around the overflow pipe at the WTP backwash supply tank (Photograph 1), El Rancho Tower (Photograph 58), 10th and Elk South Tank (Photograph 65), 10th and Elk N.W Tank (Photograph 66), 10th and Elk N.E Tank (Photograph 67), and Industrial #2 Tower (Photograph 75). None of the inspected finished water storage tanks had screens installed inside the overflow pipe.
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OAC 252:626-11-4 (h)(3)(D) “Leak detection systems shall be fitted in all areas where the ammonia is piped.”

29 CFR § 1910.1000 Table Z-1 states that the limit for ammonia in air is 50 parts per million (ppm).

- Area of Concern 21.** The EPA inspection team observed the ammonia leak detector switched off at the anhydrous ammonia feed room (Photograph 21). A pungent ammonia odor was apparent and made access into the feed room unsuitable for longer than a few seconds. Despite hearing the ventilation system running, it was not capable of reducing the strong ammonia gas odor. System representatives stated that the leak detection system is normally kept off to avoid the audible alarm from sounding all the time.
- Area of Concern 22.** The EPA inspection team did not observe an ammonia leak detector in the anhydrous ammonia storage room (Photograph 31).
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OAC 252:626-5-4 (4) “Public water supply systems shall provide the following security measures to protect water treatment plants, finished water storage facilities(which include laboratories, chemical buildings, administration buildings and storage buildings): “No Trespassing” signs shall be installed at least at fifty foot (50') intervals along the entire length of the fence and at the location of all intake structures.”

- Area of Concern 23.** The EPA inspection team did not observe any “No Trespassing” signs at the North Highway 81 Pump Station (Photograph 77).
- Area of Concern 24.** The EPA inspection team did not observe any “No Trespassing” signs at or around the Lake Humphreys intake, and System representatives stated that signage was not in place at the Lake Fuqua intake.
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OAC 252:626-5-4 (4) “Public water supply systems shall provide the following security measures to protect water treatment plants, finished water storage facilities (which include laboratories, chemical buildings, administration buildings and storage buildings): Three-strand barbed wire shall be installed atop the fence along its entire length”

- Area of Concern 25.** The EPA inspection team observed vegetation growth along lengths of the perimeter fence that covered the existing barbed wiring at the El Rancho Tower (Photograph 57) and Industrial Tower #2 (Photograph 73).
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OAC 252:631-3-20. Water pressure “All PWS systems must maintain a water pressure of at least twenty-five (25) psi throughout the distribution system.”

- Area of Concern 26.** When reviewing the System SCADA, the EPA inspection team observed only one distribution system pressure monitoring location, the 10th and Elk pump station. System representatives stated that they did not have remote monitoring of pressure anywhere else in the distribution system and instead relied on tank levels measured with ultrasonic sensors as a proxy to pressure monitoring.
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AWWA G200-15, 4.3.1.3 Treated water storage facilities. Inspection. “The utility shall have a written inspection program outlining frequency, procedures, and maintenance of records. The inspection program shall include such features as routine (daily/weekly), periodic (monthly/quarterly), and comprehensive (3–5 years) inspections.”

Area of Concern 27. The System does not have a finished water storage tank cleaning and inspection schedule and has not conducted tank inspections at any of their tanks within the past 5 years. The EPA inspection team observed an inspection sticker on the side of the El Rancho Tower from 2014; however, the System did not have any inspection records (Photograph 56).

OAC 252:626-17-4. (1) Drainage. “Design storage structures that provide pressure directly to the distribution system so they can be isolated from the distribution system and drained for cleaning or maintenance without losing pressure in the distribution system. Pipe the drain to the ground surface with no direct connection to a sewer or storm drain.”

Area of Concern 28. The EPA inspection team did not identify a drain line at the El Rancho Tower and the WTP Backwash Supply Tank. System representatives stated that they were unaware of the existence of a drain line at the El Rancho Tower and that the WTP Backwash Supply Tank did not have one.

OAC 252:626-5-15. (a) “Avoid cross connections in the system.”

OAC 252:626-5-15. (a)(1) “Do not allow a physical connection between a line carrying a public drinking water supply and a line carrying water of unknown or questionable quality.”

Area of Concern 29. The EPA inspection team observed a backflow prevention device on the polymer carrier water supply line, but System representatives stated that it was not tested annually.

Area of Concern 30. The EPA inspection team observed multiple hoses without backflow prevention devices connected directly to a fire hydrant at the El Rancho Tower (Photograph 54). The hoses were used by the construction crew building the new El Rancho Tower located at the same site as the existing El Rancho Tower.

Recommended Practice for Backflow Prevention and Cross-Connection Control: AWWA M14, Fourth Edition, Table 6-6, incorporated by reference in OAC 252:626-5-15. (f) “hose connection vacuum breakers are the appropriate backflow prevention product for hose bibb connections.”

Area of Concern 31. The EPA inspection team observed garden hoses without vacuum breakers at the South Plant filter (Photograph 9), WTP polymer storage and feed room (Photograph 50), and WTP Caustic and ACH storage building (Photograph 46). The System also had threaded hose-bibs without vacuum breakers at the Northwest Sector Tower (Photograph 76) and the rest of the South Plant filters.

OAC 252:626-9-11. (b)(7) “Design the chlorinator water supply piping to prevent contamination of the treated water supply by back-siphonage or cross connections with non-potable water. At all facilities treating surface water, pre-chlorination and post-chlorination systems must be independent to prevent possible siphoning of partially treated water into the clear well.”

Area of Concern 32. The EPA inspection observed that the carrier water for the chlorinators was not equipped with a backflow prevention device to prevent siphoning of partially treated water into the distribution system at the Duncan WTP (Photograph 48).

EPA How to Conduct a Sanitary Survey of Drinking Water Systems (2022) Section 10.4.8 “Concrete foundations should be inspected to ensure that there is minimal spalling (ground level tanks) and no cracks (elevated tanks). Anchor bolts should not be rusted so much that their material strength has been compromised. Column shoes should be clean and painted, and grout under the shoes and riser plates should be in good condition. There should not be any pooled water, erosion, weeds, or shrubs around a tank’s foundation.”

Area of Concern 33. The EPA Inspection Team observed the designed seal between the tank ring and concrete foundation to be missing at the WTP backwash supply tank, where exposed gaps extended 17 in. beneath the tank's base in one area (Photograph 2), and at the El Rancho Tower (Photograph 59).

Area of Concern 34. The EPA inspection team observed dirt, vegetation, and large shrub roots around the foundations at the El Rancho Tower (Photograph 59), 10th and Elk N.W Storage Tank (Photograph 63), 10th and Elk N.E Storage Tank (Photograph 64) , and 10th and Elk South Storage Tank.

Area of Concern 35. The EPA inspection team observed peeled paint and corrosion on the anchor bolts at the Industrial Tower #2 (Photograph 74).

Area of Concern 36. The EPA inspection team observed thinning, peeling, or corroded surface coating at the WTP Backwash Tank (Photograph 3), 10th and Elk South Storage Tank (Photograph 68 and Photograph 69), 10th and Elk N.E. Tank (Photograph 70), and 10th and Elk N.W. Tank (Photograph 71).

AWWA M42-13 Steel Water-Storage Tanks, Chapter 3 Cathodic Protection “Annual inspection of the cathodic protection system by the manufacturer or by a qualified corrosion engineer is recommended. At a minimum, this inspection should include an overall examination of the entire cathodic protection system, replacement of all defective parts, a potential profile survey, a physical check of the anode placement, and a written report...Cathodic protection systems should be tested and inspected regularly to ensure that they provide the maximum level of corrosion control to the submerged steel tank surfaces.”

Area of Concern 37. System representatives stated that the backwash holding tank was equipped with cathodic protection that had not been inspected since its installation in 2007.

10 States Recommended Standards for Water Works, 2022 Edition 5.7.5 (e) “To prevent inadvertent mixing of bulk chemicals, facilities for receiving bulk chemicals shall provide the following, unless exempted by the reviewing authority agency: Containment below the pipe connections for spilled chemicals.”

Area of Concern 38. The EPA inspection team observed no spill containment below the ACH and caustic soda pipe connection at the WTP delivery site (Photograph 45). Chemical staining was evident on the concrete floor beneath the ACH fill connection.

OAC 252:626-9-1. (h) “Safety requirements for PWS systems must meet applicable OSHA standards.”

29 CFR § 1910.1200 (f)(6) Workplace labeling. “Except as provided in paragraphs (f)(7) and (f)(8) of this section, the employer shall ensure that each container of hazardous chemicals in the workplace is labeled, tagged or marked with either: (i) The information specified under paragraphs (f)(1)(i) through (v) of this section for labels on shipped containers; or, (ii) Product identifier and words, pictures,

symbols, or combination thereof, which provide at least general information regarding the hazards of the chemicals, and which, in conjunction with the other information immediately available to employees under the hazard communication program, will provide employees with the specific information regarding the physical and health hazards of the hazardous chemical.”

- Area of Concern 39.** The EPA inspection team observed chlorine gas detectors for the chlorine storage room and the chlorinator room that were not labeled to distinguish between one and the other (Photograph 47).
- Area of Concern 40.** The EPA inspection team observed a lack of chemical labeling identifying the chemicals housed in the WTP ammonia storage room (Photograph 31).
- Area of Concern 41.** Seven ammonia pressure tanks were improperly chained, secured only with a single chain tied loosely around the necks of the tanks and a single pillar in the storage room (Photograph 26).
- Area of Concern 42.** One propane tank in the corner of the ammonia storage room and an ammonia tank were not chained (Photograph 28 and Photograph 29). System representatives stated that they were uncertain if the tanks were empty.
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AWWA G100-11, 4.2.1.2 Treatment plant capital improvement planning. “The plant shall have a current forward-looking assessment of the need for capital improvements consistent with master or facility plans. Master or facility planning should occur on a regular basis.”

- Area of Concern 43.** The System has a year-to-year Capital Improvement Plant but does not have a forward-looking long-term capital improvement plan. The 2025 Capital Improvement Plan did not contain plans for the filter media replacement project, which System representatives stated was going to be completed to meet the TOC TT requirements by July 1, 2026, as stipulated in the April 11, 2025 Consent Order.
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40 CFR § 141.63(e)(3) Maximum contaminant levels (MCLs) for microbiological contaminants “proper maintenance of the distribution system including appropriate pipe replacement and repair procedures, main flushing programs, proper operation and maintenance of storage tanks and reservoirs, cross-connection control, and continual maintenance of positive water pressure in all parts of the distribution system.”

AWWA G200-15, 4.2.5.1 Valve-exercising program. “The utility shall have a valve-exercising program. This program shall follow AWWA Manual M44 and the manufacturer’s recommended procedures and include at least the following elements:

1. A goal for the number of transmission valves to be exercised annually based on the percentage of the total valves in the system.
2. A goal for the number of distribution valves to be exercised annually.
3. Measures to verify that the goals are met and written procedures for action if the goals are not attained.
4. Critical valves in the distribution system shall be identified for exercising on a regular basis. Potential water quality and isolation concerns shall be recognized. The program shall track the annual results and set goals to reduce the percent of inoperable valves.
5. The valve-exercising program may be implemented in conjunction with the systematic flushing program (4.1.8).
6. A goal of replacing the inoperable valves identified during the operation and maintenance process shall be established as part of the exercising program.”

Area of Concern 44. The System's Valve Exercising Program identifies 56 distribution system valves but does not state what percentage of the System's total valves it makes up. System representatives stated that they had no records of any valve exercising activities.

AWWA G100-11, 4.3.1 Maintenance management. "The plant shall have a maintenance management system with practices adequate to sustain plant performance. The system shall document maintenance frequency goals, and there shall be a system to take corrective action if the goals are not being achieved. The maintenance goals shall include inspection frequency for the process units associated with plant operation."

Area of Concern 45. The System does not have a maintenance management system.

AWWA G200-15, 4.3.2.2 "The utility shall have written maintenance procedures for each pumping station (including emergency power generating equipment) describing frequency, procedures, and maintenance records."

Area of Concern 46. The EPA inspection team observed a leak from the driveshaft seal on raw water pump 2 at the Humphreys raw water pumphouse (Photograph 51).

OAC 252:626-11-1. (2) Chemical application. "Include points of application to meet the following: (A) assure maximum efficiency of treatment, ... (D) assure satisfactory mixing of the chemicals with the water..."

AWWA Water Treatment Plant Design, Fourth Edition, Chapter 6, states that in flash mixers "[w]ith propeller-type blades, coagulant chemical is generally directed to the eye of the propeller on the suction (upstream) side."

Area of Concern 47. The EPA inspection team observed ACH and polymer drip fed into the northwest corner of the square flash mixer, approximately 2 inches from the walls, with hardened coagulant precipitate attached to the walls of the rapid mix basin (Photograph 4).

OAC 252:626-11-1. (3) "General equipment design must ensure that ensure that corrosive chemicals are introduced in such a manner to minimize potential for corrosion"

Area of Concern 48. The EPA inspection team observed eroded concrete in the flash mix interior, near application point of ACH and polymer in the flash mixer (Photograph 4).

OAC 252:626-11-3. (j)(9) "Design feed lines to be color-coded, per Appendix A"

Area of Concern 49. The EPA inspection team observed ACH and polymer feed lines without color coding at the flash mix injection point (Photograph 5). The ACH feed line was mislabeled as "Ferric Chloride," although the System does not use ferric chloride as a coagulant anymore.

OAC 252:631-3-1. (a) "All systems must properly operate, in accordance with a Operations and Maintenance manual as required by OAC 252:626-3-7. All systems must maintain each unit to provide treatment of the water in accordance with the DEQ approved plans and specifications, in accordance with the purpose for which the units were designed and according to the terms of their permits."

Area of Concern 50. The EPA inspection team observed leaking water through cracks in the concrete of the flash mix basin (Photograph 5) and the South Filter Building, adjacent to filter 6 (Photograph 17 and Photograph 18).

OAC 252:626-5-4. Security protection “Public water supply systems shall provide the following security measures to protect water treatment plants, finished water storage facilities (which include laboratories, chemical buildings, administration buildings and storage buildings): (5) Locks shall be installed on all gates, entry doors, manholes, other access points, water wells and pumping stations. Electric gates shall be considered equivalent to locked gates.”

Area of Concern 51. The EPA inspection team did not observe locks on the door to the ammonia storage room (Photograph 31).

AWWA G100-11, 4.2.4 Housekeeping procedures and cleanliness. “Areas of the plant shall be maintained in a neat and orderly condition. Operation and maintenance functions should be conducted in such a manner that plant site safety and water quality are not compromised.”

Area of Concern 52. The EPA inspection team observed a broken electrical conduit on the side of the caustic feed pit, which exposed electrical wires to the elements (Photograph 20).

Area of Concern 53. The EPA inspection team observed one expired 2-gallon jug of pH 10 buffer solution at the WTP Lab.

Section VI – LIST OF APPENDICES

Appendix A – Photograph Log

Appendix B – Inspection Sign-In Sheet

Appendix C – April 11, 2025, Consent Order

Appendix A – PHOTOGRAPH LOG

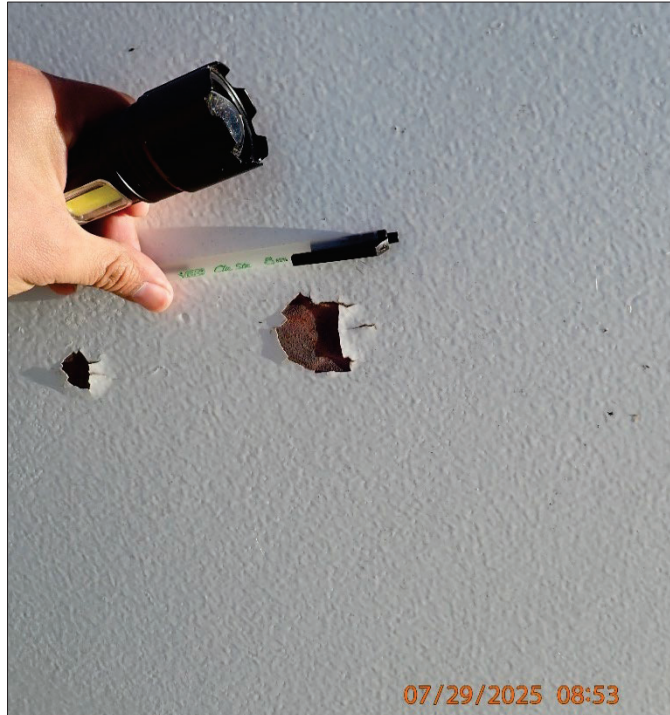
Unless otherwise indicated herein, all photographs were taken by Kevin Sarmiento and Brynn Goe of ERG during the inspection. The displayed date and time are in the local time zone (CST). Photographs were not manipulated beyond minor cropping for sizing or the addition of labels or callouts to draw attention to the subject of the photograph.



Photograph 1. 7/29/2025 08:47 P7290243.JPG Duncan WTP Backwash Tank
Description: Metal flapper on the end of the overflow line on the backwash supply tank that does not create a proper seal.



Photograph 2. 7/29/2025 08:51 P7290252.JPG Duncan WTP Backwash Supply Tank
Description: Gap between the base of the WTP backwash supply tank and the concrete tank pad.



Photograph 3. 7/29/2025 08:53 P7290254.JPG Duncan WTP Backwash Supply Tank
Description: Chipping paint on the WTP backwash supply tank.



Photograph 4. 7/29/2025 08:58 P7290263.JPG Duncan WTP Flash Mixer
Description: ACH and Polymer injection points into the flash mixer. Note the proximity to the concrete wall, chemical buildup on the wall, and erosion of the concrete.



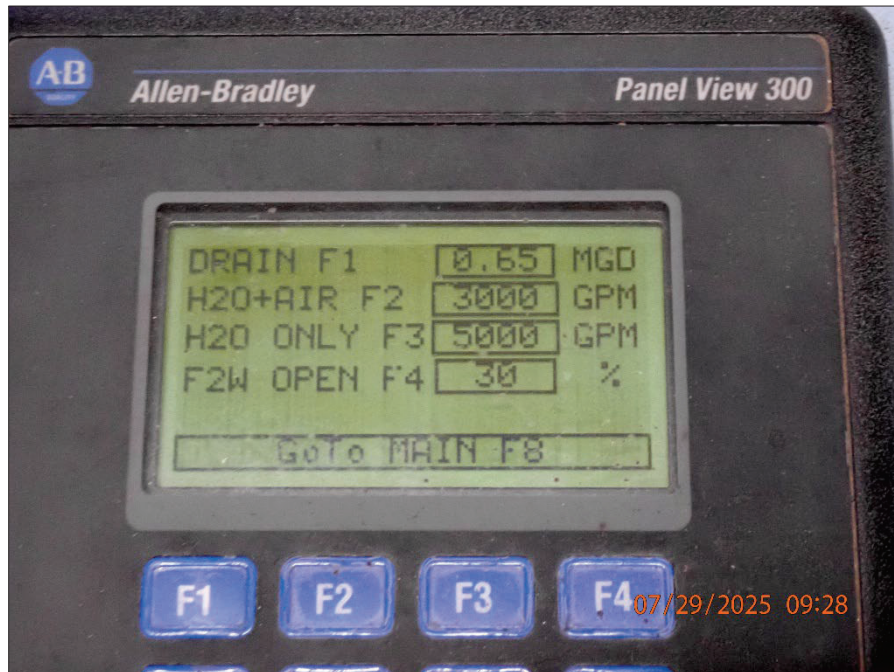
Photograph 5. 7/29/2025 09:01 P7290269.JPG Duncan WTP Flash Mixer

Description: Cracking of the outer concrete wall of the flash mix basin at the WTP, called out with red circle. ACH and Polymer feed lines not appropriately labeled, shown with red arrows.



Photograph 6. 7/29/2025 08:04 100_0008.JPG Duncan WTP PAC Tank

Description: Powdered activated carbon storage tank that was built and then abandoned.



Photograph 7. 7/29/2025 09:28 P7290309.JPG South Plant Filter 5

Description: Filter backwash stages and flowrates. Note the absence of a low-rate wash after the high-rate wash.



Photograph 8. 7/29/2025 09:20 P7290302.JPG South Plant Filter 5

Description: Heavily corroded air scour piping at the Water Treatment Facility.



Photograph 9. 7/29/2025 09:35 P7290322.JPG South Plant Filter 1 & 2

Description: Garden hose connected to hose bib without vacuum breaker at the South Plant Filters.



Photograph 10. 7/29/2025 09:36 P7290328.JPG WTP South Plant Filter

Description: Hose bib in the Water Treatment Facility without a hose bib vacuum breaker.

City of Duncan
Water Treatment Plant
Shift Report

Date: 7-29-25
Day: Tuesday
Shift: 2nd
Operator: Tony

Attendance
Tony
Sally
Brett
Bryan

Wauka	Humphreys	Pond Pumps	Chlorine Residuals				Plant Turbidities				Plant pH Meters				
			Time	Post	CWI	Dist	Time	CWI	Dist	Time	Lab / Plant	Time	Lab / Plant		
ON	ON	ON	0812	3.8	3.7	3.9	0815	0.55	0.46	0815	7.82	8.00	0815	7.62	7.15
ON	ON	ON	1102	3.9	4.0	3.9	1101	0.19	0.60	1101	7.21	7.04	1101	7.21	7.97
ON	ON	ON	1241	4.7	4.7	3.9	1241	0.54	0.48	1241	7.21	7.97	1241	7.21	7.97
18" Line % Open			Chlorine Flow				Polyphos				NH3 Line				
Time			Time				Time				Time				
#1 CL2 Weight			#2 CL2 Weight				Distribution Total				SP Total Treated				
1104			110				1300				1315				
Total Treated			Recovery Total				Wash Water in 1000 gal.				Shift 1				
0840			0840				0840				0840				
Shift 2			Shift 3				Total				Plant Master Level				
1101			1256				1256				1256				
Time			Time				Time				Time				
0840			1102				1257				0840				
N/P			N/P				N/P				N/P				
27.4			27.0				26.9				27.4				
1102			1257				0840				1102				
Time			Time				Time				Time				
0841			1102				1257				0841				
CW Level			SP Level				Plant Raw Flow				SP CW Level				
20.4			13.2				3.94				9.7				
1102			1257				0841				1102				
Time			Time				Time				Time				
0841			1102				1257				0841				
Plant Eff Flow			Distribution Flow				Plant Raw Flow				SP CW Level				
4.13			3.55				3.94				9.7				
1102			1257				0841				1102				
Time			Time				Time				Time				
0841			1102				1257				0841				
Free NH3			Total NH3				Mono				Ammonia				
0.13			0.94				4.14				0.907				
1102			1257				0841				1102				
Time			Time				Time				Time				
0841			1102				1257				0841				
Feed Rate			NH3 Weight				Time				Time				
30			30				30				30				
1102			1257				0841				1102				
Time			Time				Time				Time				
0841			1102				1257				0841				

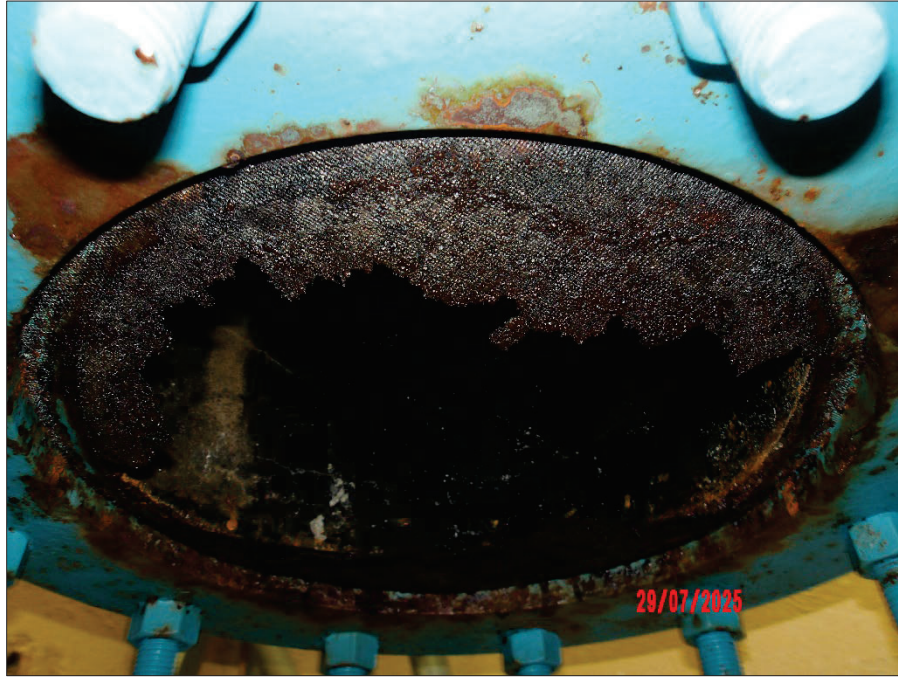
Photograph 11. 7/29/2025 14:21 P7290620.JPG Daily Operation Log

Description: Daily operation log for the treatment plant. Backwash recycle information called out with red a circle.

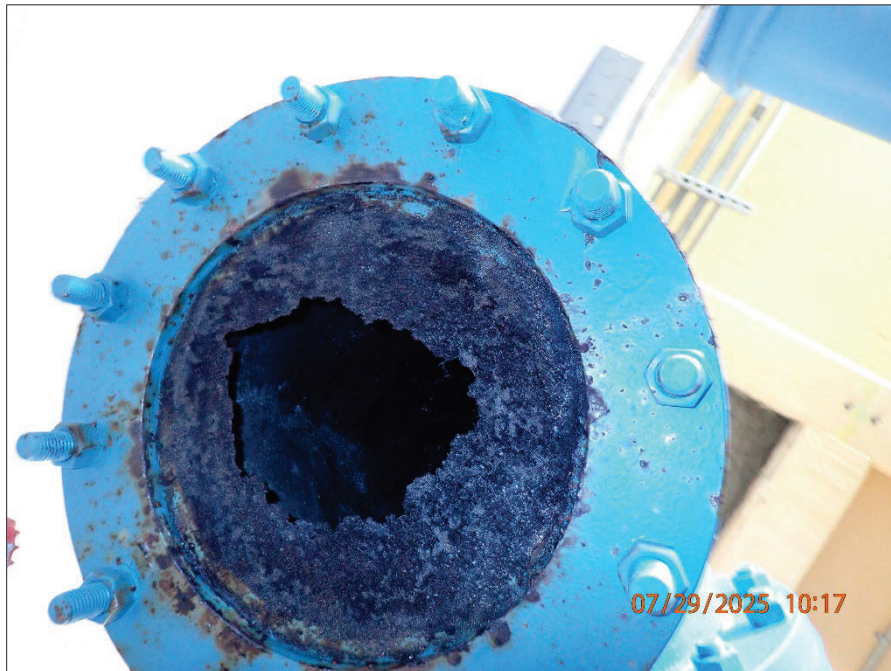


Photograph 12. 7/29/2025 08:57 100_0044.JPG South Plant Filter Gallery

Description: Paint stored in the South train filter pipe gallery next to the 0.5 MG Clearwell access hatch.



Photograph 13. 7/29/2025 09:04 100_0054.JPG 0.5 MG Clearwell
Description: Torn vent screen on the 0.5 MG Clearwell.



Photograph 14. 7/29/2025 10:17 P7290405.JPG 0.5 MG Clearwell
Description: Corroded and torn vent screen on the 0.5 MG Clearwell.



Photograph 15. 7/29/2025 10:03 P7290379.JPG South Plant Filter Gallery
Description: Unsealed opening on roof of 0.5 MG clearwell, around sample pump access piping.



Photograph 16. 7/29/2025 10:04 P7290380.JPG South Plant Filter Gallery
Description: Unsealed opening on roof of 0.5 MG clearwell, around sample pump access piping.



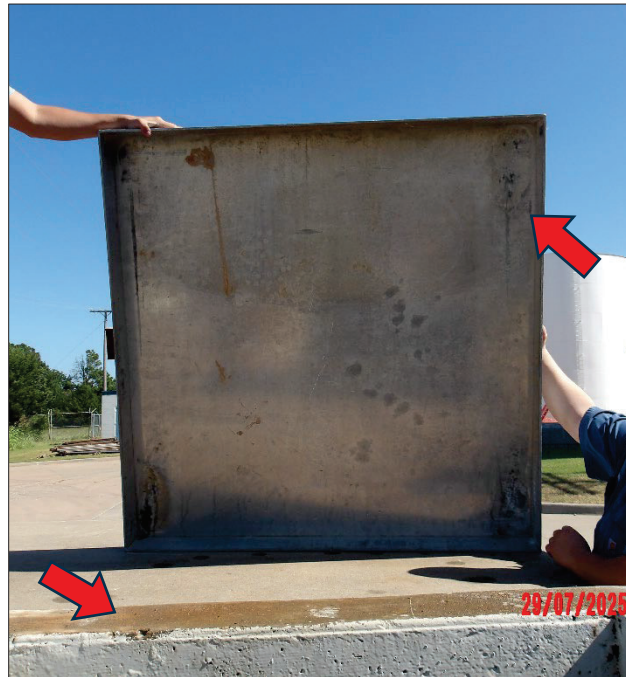
Photograph 17. 7/29/2025 10:21 P7290415.JPG South Plant Filter 6

Description: Cracking in the concrete is allowing water seepage on the outside filter wall for filter #6.



Photograph 18. 7/29/2025 10:21 P7290416.JPG South Plant Filter 6

Description: Cracking in the concrete is allowing water seepage on the outside filter wall for filter #6.



Photograph 19. 7/29/2025 09:26 100_0085.JPG Post Chlorine Access Pit
Description: Post chlorine pit without a sanitary seal between the hatch and concrete rim, called out with red arrows.



Photograph 20. 7/29/2025 10:29 P7290419.JPG Caustic Feed Pit
Description: Caustic feed pit hatch with a broken conduit on the side that allows a direct opening into the pit.



Photograph 21. 7/29/2025 09:34 100_0094.JPG Ammonia Feed Room
Description: Disarmed ammonia gas detection alarm at the ammonia feed room.



Photograph 22. 7/29/2025 10:39 P7290449.JPG Ammonia Storage Room
Description: Hydrochloric acid drums located in the anhydrous ammonia storage room without secondary containment at the Water Treatment Facility.



Photograph 23. 7/29/2025 09:40 100_0101.JPG Ammonia Storage Room
Description: Hydrochloric acid drums located in the anhydrous ammonia storage room at the Water Treatment Facility, without secondary containment, that are bulging due to increased pressure.



Photograph 24. 7/29/2025 10:39 P7290446.JPG Ammonia Storage Room
Description: Hydrochloric acid drum label at the Water Treatment Facility.



Photograph 25. 7/29/2025 09:41 100_0103.JPG Ammonia Storage Room

Description: BrennpHOS 100 drum located in the anhydrous ammonia storage room at the Water Treatment Facility.



Photograph 26. 7/29/2025 10:42 P7290461.JPG Ammonia Storage Room

Description: Ammonia gas cylinders located in the anhydrous ammonia storage room at the Water Treatment Facility.



Photograph 27. 7/29/2025 10:41 P7290458.JPG Ammonia Storage Room
Description: Hydrochloric acid and phosphate stored in the same room as anhydrous ammonia.

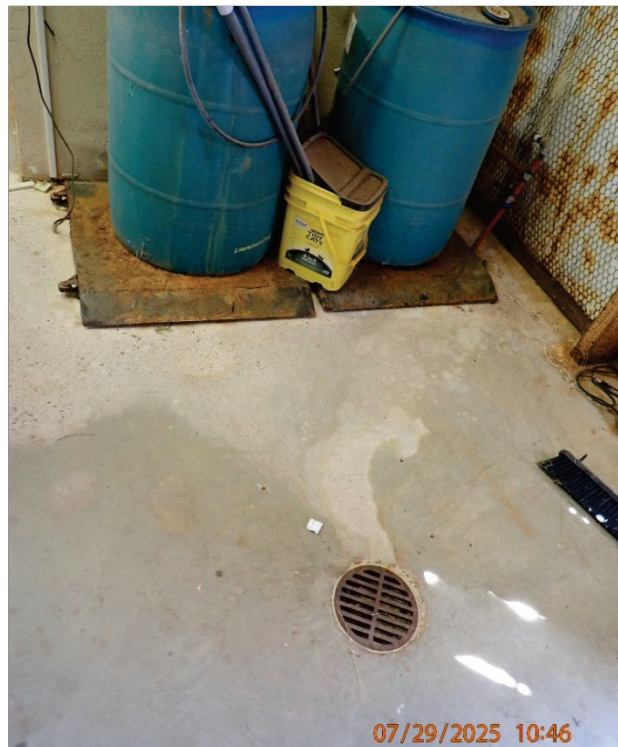


Photograph 28. 7/29/2025 10:43 P7290465.JPG Ammonia Storage Room
Description: A single propane tank located in the anhydrous ammonia storage room at the Water Treatment Facility.



Photograph 29. 7/29/2025 10:39 P7290448.JPG Ammonia Storage Room

Description: A single unsecured ammonia cylinder located in the anhydrous ammonia storage room at the Water Treatment Facility.



Photograph 30. 7/29/2025 10:46 P7290469.JPG Ammonia Storage Room

Description: Floor drain inside the ammonia storage room discharges into the backwash recycle ponds.



Photograph 31. 7/29/2025 10:46 P7290471.JPG Ammonia Storage Room

Description: Anhydrous ammonia storage room door without chemical identification placard or locking mechanism.



Photograph 32. 7/29/2025 10:52 P7290484.JPG 3.5 MG Clearwell

Description: Access hatch to the 3.5 MG Clearwell at the WTP without a gasket seal.



Photograph 33. 7/29/2025 10:52 P7290485.JPG 3.5 MG Clearwell
Description: Access hatch to the 3.5 MG clearwell without a gasket seal.



Photograph 34. 7/29/2025 10:52 P7290488.JPG 3.5 MG Clearwell
Description: Cracked concrete and exposed rebar around the 3.5 MG Clearwell access hatch.



Photograph 35. 7/29/2025 10:49 P7290477.JPG 3.5 MG Clearwell

Description: Device mounted to the roof of the 3.5 MG Clearwell with unprotected openings around the screw holes.



Photograph 36. 7/29/2025 10:51 P7290481.JPG 3.5 MG Clearwell

Description: Opening through the screw hole of the roof mounted device at the 3.5 MG Clearwell.



Photograph 37. 7/29/2025 09:58 100_0115.JPG 3.5 MG Clearwell

Description: Standing water and vegetation growth around the high service and backwash supply pumps at the 3.5 MG Clearwell.



Photograph 38. 7/29/2025 11:00 P7290503.JPG 3.5 MG Clearwell

Description: Openings around the support base of the high service pumps on the roof of the 3.5 MG Clearwell.



Photograph 39. 7/29/2025 11:23 P7290518.JPG Polyphosphate Storage Room
Description: Drums of blended poly-orthophosphate corrosion control inhibitor stored in the WTP Polyphosphate Storage Room.



Photograph 40. 7/29/2025 10:27 100_0172.JPG Polyphosphate Storage Room
Description: Storage of poly-orthophosphate, 23 percent hydrofluosilicic acid, and 12 percent sodium hypochlorite drums in the Polyphosphate Storage Room.



Photograph 41. 7/29/2025 10:27 100_0171.JPG Polyphosphate Storage Room
Description: 23 percent hydrofluorosilicic acid drum in the polyphosphate storage room.



Photograph 42. 7/29/2025 10:23 100_0166.JPG Polyphosphate Storage Room
Description: Drums of sodium hypochlorite stored in the Polyphosphate Storage Room.



Photograph 43. 7/29/2025 10:32 100_0182.JPG ACH and Caustic Chemical Building
Description:. Caustic soda and ACH bulk storage tanks and day tanks with a shared drainage system for accidental spills.



Photograph 44. 7/29/2025 13:14 P7290533.JPG ACH and Caustic Chemical Building
Description: Caustic soda and ACH bulk storage tanks with tap measure on the side of the 8,000 gallon fiberglass storage tanks.



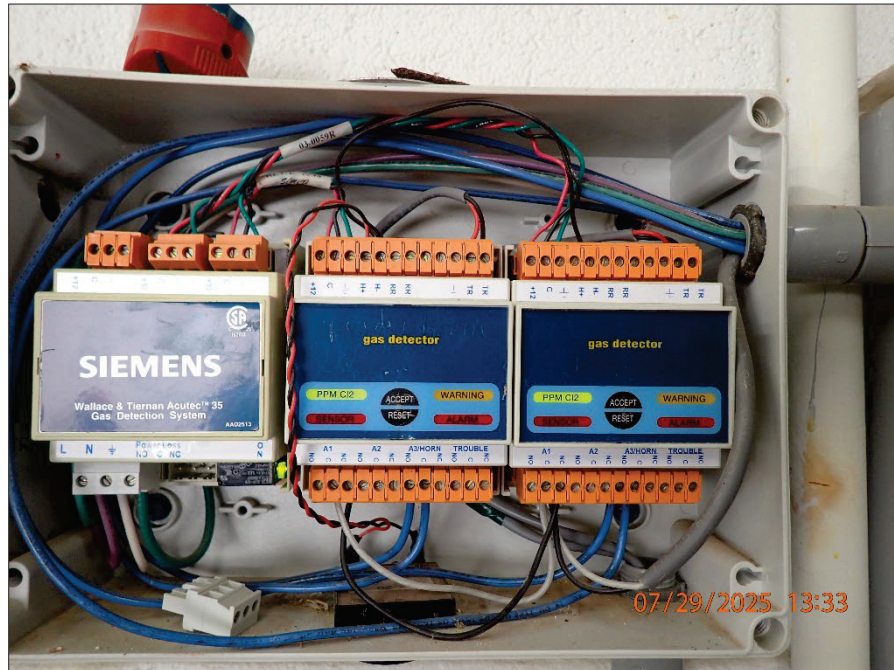
Photograph 45. 7/29/2025 13:21 P7290544.JPG WTP Chemical Loading Zone

Description: ACH and Caustic delivery site without secondary spill containment at the WPT loading dock. Chemical hose connections called out with red circles. Note the chemical residue stains on the concrete below the ACH hose connection, called out with red arrow.



Photograph 46. 7/29/2025 13:13 P7290526.JPG ACH and Caustic Chemical Building

Description: Garden hose connected to hose bib without vacuum breaker at the ACH and Caustic Chemical Building.



Photograph 47. 7/29/2025 13:33 P7290567.JPG WTP Chlorinator Room

Description: Chlorine gas detectors for the chlorine gas storage room and chlorinator room without labeling specific to each room.



Photograph 48. 7/29/2025 13:35 P7290572.JPG WTP Chlorinator Room

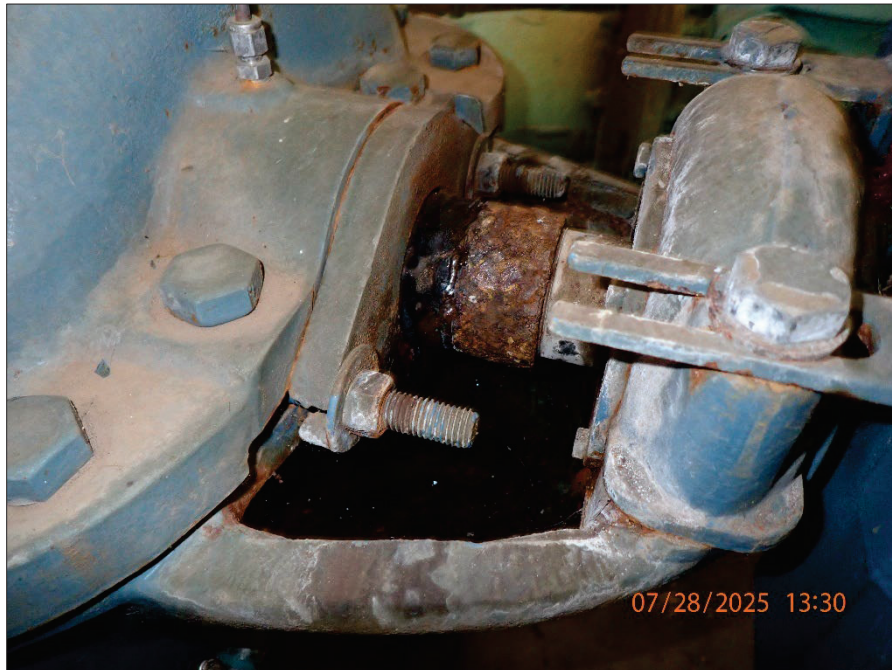
Description: Chlorine gas carrier water line without backflow prevention device at the WTP chlorinator room. Potable water line called out with red arrow.



Photograph 49. 7/29/2025 13:43 P7290595.JPG Polymer Feed and Storage Room
Description: Spill containment does not extend below the IBC tote pipe connections. Note that the liquid on the floor is ground water and not polymer.



Photograph 50. 7/29/2025 13:49 P7290608.JPG Polymer Feed and Storage Room
Description: Garden hose connected to hose bib without vacuum breaker at the polymer storage and feed room.



Photograph 51. 7/28/2025 13:30 P7280015.JPG Humphreys Raw Water Pumphouse
Description: Leak from the driveshaft seal on raw water pump 2 at the Humphreys raw water pumphouse.



Photograph 52. 7/28/2025 13:44 P7280049.JPG Permanganate Storage and Feed Room
Description: Sodium permanganate storage without secondary containment.



Photograph 53. 7/28/2025 13:46 P7280052.JPG Permanganate Storage and Feed Room
Description: Spilled sodium permanganate around the sodium permanganate day tank.



Photograph 54. 7/28/2025 14:21 P7280077.JPG El Rancho Tower
Description: Hydrant tap used by the El Rancho Tower construction company without a backflow prevention device.



Photograph 55. 7/28/2025 14:21 P7280076.JPG El Rancho Tower

Description: Garden hoses connected to fire hydrant at work site of the new El Rancho Tower.



Photograph 56. 7/28/2025 14:25 P7280086.JPG El Rancho Tower

Description: Inspection sticker from 2014 at the El Rancho Tower.



Photograph 57. 7/28/2025 14:29 P7280096.JPG El Rancho Tower

Description: Vegetation growth around the El Rancho Tower base and on the security fencing.



Photograph 58. 7/28/2025 14:25 P7280090.JPG El Rancho Tower

Description: A metal flapper on the end of the El Rancho Tower overflow line that does not create a proper seal.



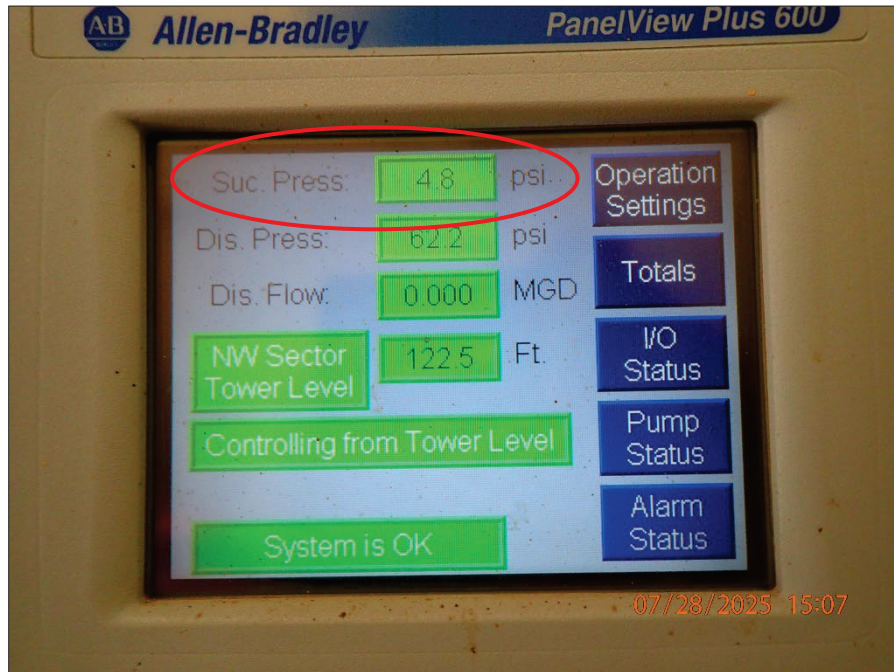
Photograph 59. 7/28/2025 14:32 P7280106.JPG El Rancho Tower

Description: Gap between the El Rancho Tower base ring and the concrete tank pad. Note the pen inside the gap.



Photograph 60. 7/28/2025 15:11 P7280187.JPG 10th and Elk Pumphouse

Description: Air relief valve without screened outlet at the 10th and Elk Pumphouse.



Photograph 61. 7/28/2025 15:07 P7280177.JPG 10th and Elk Pumphouse
Description: Human-machine interface at the 10th and Elk Pumphouse showing a suction pressure of 4.8 psi.



Photograph 62. 7/28/2025 15:03 P7280162.JPG 10th and Elk South Tank
Description: Vegetation growth around the base and climbing up the 10th and Elk South Tank.



Photograph 63. 7/28/2025 14:52 P7280125.JPG 10th and Elk N.W Tank
Description: Soil build-up at the base of the 10th and Elk N.W Tank covering the tank ring.



Photograph 64. 7/28/2025 14:58 P7280145.JPG 10th and Elk N.W Tank
Description: Vegetation and roots growing around the foundation of the 10th and Elk N.W Tank.



Photograph 65. 7/28/2025 15:02 P7280156.JPG 10th and Elk South Tank

Description: Metal flapper on the end of an overflow line for the 10th and Elk South Tank that does not create a proper seal.



Photograph 66. 7/28/2025 14:54 P7280135.JPG 10th and Elk N.W Tank

Description: A metal flapper at the end of the overflow line on the 10th and Elk N.W Tank that does not create a proper seal.



Photograph 67. 7/28/2025 14:03 100_0071.JPG 10th and Elk N.E Tank

Description: Metal flapper on the end of the overflow line on the 10th and Elk N.E Tank that does not create a proper seal.



Photograph 68. 7/28/2025 15:04 P7280168.JPG 10th and Elk South Tank

Description: Corrosion on the surface coating of the 10th and Elk South Tank.



Photograph 69. 7/28/2025 15:04 P7280170.JPG 10th and Elk South Tank
Description: Corrosion on the roof of the 10th and Elk South Tank.



Photograph 70. 7/28/2025 14:04 100_0076.JPG 10th and Elk N.E. Tank
Description: Corrosion on the surface coating of the 10th and Elk N.E. Tank



Photograph 71. 7/28/2025 14:59 P7280148.JPG 10th and Elk N.E Tank
Description: Peeling surface coating at the 10th and Elk N.E Tank.



Photograph 72. 7/28/2025 15:26 P7280192.JPG North Industrial Tower #1 (West)
Description: Security fencing blocking access to North Industrial Tower #1 (West).



Photograph 73. 7/28/2025 15:37 P7280213.JPG North Industrial Tower #2 (East)
Description: Vegetation growth on the security fencing around North Industrial Tower #2 (East).



Photograph 74. 7/28/2025 15:35 P7280206.JPG Industrial Tower #2 (East)
Description: Corrosion with metal loss on the anchor bolts at Industrial Tower #2.



Photograph 75. 7/28/2025 15:33 P7280202.JPG North Industrial Tower #2 (East)
Description: Metal flapper on the end of the overflow line on the Industrial #2 Tower that does not create a proper seal.



Photograph 76. 7/28/2025 14:53 100_0112.JPG N.W. Sector Tower
Description: Threaded hose tap at N.W. Sector Tower is missing a hose bib vacuum breaker device.



Photograph 77. 7/29/2025 13:55 100_0231.JPG North Highway 81 Pumphouse
Description: Security fencing at North Highway 81 Pumphouse missing proper signage.

Appendix B – SIGN-IN SHEET

SDWA PWSS Inspection Sign-In Sheet

Date: July 28, 2025

System Name: Duncan Public Utilities Authority PWSID: OK1010809

Meeting: Opening Conference

Name	Affiliation, Title	Email Address	Phone Number
Kevin Sarmiento	ERG, Inspector	Kevin.Sarmiento@erg.com	703-633-1642
Brynn Goe	ERG, Inspector	Brynn.Goe@erg.com	303-519-2332
Charles "Karl" Holtz	W/WW Superintendent	kholtz@duncanok.gov	580-167-4204
BRIAN BITTEN	WATER SUPERVISOR	britter@duncanok.gov	580-255-9190
John Bges	IT Director C.O.P.	jbgies@duncanok.gov	580-475-4041
Daniel Kim	EPA, Inspector	kim.daniel@epa.gov	214-665-6671
Isaac Sparks	ODEQ, PWSES	isaac.sparks@deq.ok.gov	405-702-8103
Kimberly WIRTZ	ODEQ, environmental	Kimberly.WIRTZ@deq.ok.gov	572-206-9484 575

SDWA PWSS Inspection Sign-In Sheet

Date: July 29, 2025

System Name: Duncan Public Utilities Authority PWSID: OK1010809

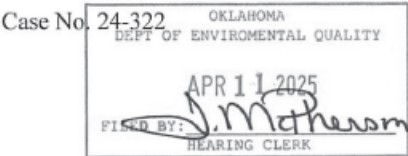
Meeting: Closing Conference

Name	Affiliation, Title	Email Address	Phone Number
Kevin Sarmiento	ERG, Inspector	Kevin.Sarmiento@erg.com	703-633-1642
Brynn Goe	ERG, Inspector	Brynn.Goe@erg.com	303-519-2332
Thomas Nguyen	DEQ, District Representative	thomas.nguyen@deq.ok.gov	405-702-8246
BRIAN RITTER	DUNCAN WATER SUPERVISOR	britter@duncanok.gov	580-255-9190
ISAAC SPARKS	ODEQ, DISTRICT REPRESENTATIVE	ISAACSPARKS@DEQ.OK.GOV	405-702-8103
Daniel Kim	EPA RB, Inspector	Kim.daniel@epa.gov	214-665-6671
Charles "Karl" Holtz	W/WW Superintendent	kholtz@duncanok.gov	580-467-4204

Appendix C – APRIL 11, 2025, CONSENT ORDER

**STATE OF OKLAHOMA
DEPARTMENT OF ENVIRONMENTAL QUALITY
WATER QUALITY DIVISION**

IN THE MATTER OF:)
Duncan Public Utilities Authority,)
Respondent,)
)
)
PWSID No. OK1010809)
Problem: TOC TT, Construction, and)
Operational Violations)



CONSENT ORDER

The parties to this case, the State of Oklahoma, ex rel. Department of Environmental Quality (“DEQ”) and Duncan Public Utilities Authority (“Respondent”) agree to this Consent Order to resolve certain environmental compliance issues.

This Consent Order supersedes and closes Notices of Violation (“NOV”) No. P-1010809-23-2 dated June 27, 2023; No. P-1010809-24-1 dated May 3, 2024; and No. P-1010809-24-2 dated July 25, 2024.

FINDINGS OF FACT

1. Respondent owns and operates a public water supply (“PWS”) system in Stephens County, Oklahoma, where the source of water is surface water, and is defined as a community system in Title 40 of the Code of Federal Regulations (“C.F.R.”) § 141.2, Oklahoma Administrative Code (“OAC”) 252:626-1-2, and OAC 252:631-1-2.
2. In order to demonstrate compliance with Total Organic Carbon (“TOC”) treatment technique (“TT”) requirements, the average of twelve (12) consecutive months of TOC removal ratios must be at least 1.00 or greater. Samples submitted by Respondent for analysis indicate the

Duncan Public Utilities Authority
PWSID No. OK1010809
Consent Order, Case No. 24-322

following instances of 12-month, TOC removal ratio averages being below the minimum required
12-month, TOC removal ratio average of 1.00:

Monitoring Period	Monitoring Location	12-Month TOC Removal Ratio Average
April 1, 2023 to March 31, 2024	Duncan WTP	0.99
July 1, 2023 to June 31, 2024	Duncan WTP	0.98

3. On June 8 and 9, 2023, Lisa Cox, P.E., District Engineer for DEQ, and Elliot Grimes, District Representative for DEQ, performed a sanitary survey inspection of Respondent's PWS system.

4. On June 27, 2023, DEQ issued NOV No. P-1010809-23-2 to Respondent for the following violations identified during the inspection on June 8 and 9, 2023:

- 4.1. **OAC 252:626-17-1(k) and OAC 252:631-3-1(a)** – The 3.5 MG Clearwell had a slow leak near the bottom of the south side and was not watertight.
- 4.2. **OAC 252:621-5-1(1)** – The lagoons were not maintained as there was excessive vegetation in the lagoons.
- 4.3. **OAC 252:621-5-1(10)(C)** – The lagoon liner was not adequate to prevent seepage from lagoons number 53 and 56.
- 4.4. **OAC 252:626-5-4** – The 27th Street Tower was not surrounded by a six (6) foot tall chain link fence equipped with three-strand barbed wire and "No Trespassing" signs.
- 4.5. **OAC 252:626-11-2** – There was not a conveniently located eye-washing device and deluge shower for the chemical handling and storage area for sodium permanganate at the Lake Humphreys intake.
- 4.6. **OAC 252:626-11-3(g)(4)(B)** – Spill containment was not provided for storage of the liquid polymer, ACH, sodium permanganate, caustic, or polyphosphate.
- 4.7. **OAC 252:626-11-4(a)(1)(C)** – The gas chlorination room door was not equipped with panic hardware (i.e., a crash bar or push bar opening the door to the outside).
- 4.8. **OAC 252:626-15-5(d)(1)(E)** – The N Hwy 81 pump station did not have a discharge measuring device.

Duncan Public Utilities Authority
PWSID No. OK1010809
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- 4.9. **OAC 252:626-17-1(h)** – The NE Elk Tower, NW Elk Tower, and South Elk Tower overflows did not discharge over a drainage structure or splash plate.
- 4.10. **OAC 252:631-3-1(a)** – Due to a lack of documentation such as maintenance records or inspection reports, the condition of the hatch, vent, roof, and interior could not be verified for the following finished water storage facilities: 3.5 MG Clearwell, 0.5 MG Clearwell, 27th Street Tower, Backwash Tower, El Rancho Tower, Industrial No. 2 Tower, NE Elk Tower, South Elk Tower, and NW Sector Tower.
- 4.11. **OAC 252:631-3-16** – Dead-ends in the distribution system were not flushed at least once every ninety (90) days or more frequently as necessary to maintain adequate chlorine residuals.
- 4.12. **OAC 252:631-3-19(b)** – The residuals in the lagoons were not kept two (2) feet below the maximum operating depth.

Respondent received the NOV on June 29, 2023. The NOV required Respondent to immediately correct the violation above numbered 4.1 and to provide documentation of their correction to DEQ within thirty (30) days of receipt of the NOV. The NOV also required Respondent to submit to DEQ an approvable corrective action plan (“CAP”), with dates, for the violations numbered 4.2-4.12 within thirty (30) days of receipt of the NOV. If any violations requiring immediate correction could not be corrected within thirty (30) days, Respondent was required to provide the reasons why and to include the violations in the approvable CAP, with dates.

- 5. On July 19, 2023, DEQ received from Respondent a response for NOV No. P-1010809-23-2 that provided an approvable CAP, with dates, for the violations.
- 6. On May 3, 2024, DEQ issued NOV No. P-1010809-24-1 to Respondent for the TOC TT violations occurring from April 1, 2023, to March 31, 2024. Respondent received the NOV on May 6, 2024. The NOV required Respondent to take action to eliminate and prevent the reoccurrence of the cited violations.
- 7. On May 17, 2024, Isaac Sparks, District Representative for DEQ, performed a follow-up

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inspection of Respondent's PWS system. During this inspection, Mr. Sparks confirmed that violations 4.2-4.5, 4.7, 4.9, and 4.12 had been corrected.

8. On July 17, 2024, DEQ sent respondent a letter requesting a written update to NOV No. P-1010809-23-2 from Respondent. On August 29, 2024, Respondent provided an update that demonstrated progress towards the correction of the violations cited in the NOV and provided an updated CAP, with dates. This CAP includes a schedule for budgeting necessary funds to correct the violations, hiring necessary staff to perform flushing, storage tank inspections, and bidding of projects.

9. On July 25, 2024, DEQ issued NOV No. P-1010809-24-2 to Respondent for the TOC TT violations occurring from July 1, 2023, to June 31, 2024. Respondent received the NOV on July 29, 2024. The NOV required Respondent to take action to eliminate and prevent the reoccurrence of the cited violations.

10. On January 6, 2025, Mr. Sparks attempted to contacted The Honorable Robert Armstrong, Chairman for Respondent, by telephone. Mr. Sparks was informed by the city hall clerk that email was the best way to contact Mayor Armstrong directly. Mr. Sparks sent an email that notified Mayor Armstrong that DEQ would be offering Respondent this Consent Order to establish a schedule to eliminate and prevent TOC TT, construction, and operational violations. Mayor Armstrong was notified of both the included penalty and the option to meet with DEQ for an early resolution meeting to discuss the terms presented in this Consent Order.

11. On January 13, 2025, Mr. Sparks spoke with Chris Deal, City Manager for Respondent, by telephone. Mr. Deal was notified that DEQ would be offering Respondent this Consent Order to

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establish a schedule to eliminate and prevent TOC TT, construction, and operational violations.

Mr. Deal was to inform Mayor Armstrong of the offered Consent Order, and Mayor Armstrong was to respond to DEQ.

12. On January 13, 2025, Mayor Armstrong requested an early resolution meeting. The meeting was held February 13, 2025. In attendance, representing DEQ, was Afiya Wilkins, Attorney for DEQ; and Mr. Sparks. In attendance, representing Respondent, was Mayor Armstrong, Mr. Deal, Larry Jones, Assistant Director of Public Works; and Karl Holtz, Water and Wastewater Superintendent for Respondent. During this meeting, the tasks of this Order, their associated due dates, and penalty amounts were discussed. Based on Respondent's work towards resolving the violations, DEQ agreed to defer all penalties, as indicated in Paragraph 27 of this Order.

13. The parties agree that it is beneficial to resolve these matters promptly and by agreement.

14. The parties waive the filing of a petition or other pleading, and Respondent waives the right to a hearing.

CONCLUSIONS OF LAW

15. DEQ has regulatory jurisdiction and authority in this matter, and Respondent is subject to the jurisdiction and authority of DEQ under 27A O.S. § 1-3-101(B) and the Oklahoma Water Supply Systems Act, 27A O.S. § 2-6-301 *et seq.*, and the rules promulgated thereunder in the Oklahoma Administrative Code ("OAC") at OAC 252:626 and OAC 252:631.

16. Respondent and DEQ are authorized by 75 O.S. § 309(E) and 27A O.S. § 2-3-506(B) to resolve this matter by agreement.

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17. Respondent violated OAC 252:626-11-3(g)(4)(B). This provision states a PWS system must equip liquid chemical storage tanks with “an overflow and receiving basin or drain capable of receiving accidental spills or overflows.”
18. Respondent violated OAC 252:626-15-5(d)(1)(E). This provision states a PWS system must equip each pump with a “discharge measuring device.”
19. Respondent violated OAC 252:626-17-1(k). This provision states a PWS system must “[m]ake the roof and side walls of all structures watertight with no openings except properly constructed vents, manholes, overflows, risers, drains, pump mountings, control ports, and piping for inflow and outflow.”
20. Pursuant to OAC 252:631-1-3, “The provisions of Parts 141, ‘National Primary Drinking Water Regulations,’ and 143, ‘National Secondary Drinking Water Regulations,’ of Title 40 of the Code of Federal Regulations [C.F.R.] as published on October 30, 2024, and the requirements contained therein are, unless otherwise specified, adopted and incorporated by reference.”
21. Respondent violated OAC 252:631-3-1(a). This provision states “[a]ll systems must properly operate, in accordance with a Operations and Maintenance manual as required by OAC 252:626-3-7. All system must maintain each unit to provide treatment of the water in accordance with the DEQ approved plans specifications, in accordance with the purpose for which the units were designed and according to the terms of their permits... Employees must be trained in the proper operation and maintenance of the system.”
22. Pursuant to OAC 252:631-3-1(b), “Public water supply systems must comply with all applicable Primary Drinking Water Standards in 40 [C.F.R.] Part 141...”

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23. Respondent violated OAC 252:631-3-16. This provision states “PWS systems must avoid dead-ends in the distribution system. Where a dead-end main exists, it must be equipped with a valve or other arrangement for flushing. Flush until the water is clear or a chlorine residual is found. Flush every ninety (90) days or more often where conditions require.”
24. Pursuant to 40 C.F.R. § 141.135(b), PWS systems must achieve specified percent reductions of TOC, dependent on source-water TOC and source-water alkalinity characteristics.
25. Respondent violated 40 C.F.R. § 141.135(c)(1)(v). This provision states that 12-month, TOC removal ratio averages must remain at 1.00 or greater.

ORDER

26. Based on the above paragraphs, Respondent and DEQ agree, and it is ordered by the Executive Director as follows:

TASK	DATE
A. Respondent shall correct the violations addressed by the approved updated CAP referenced in Paragraph 8 of this Order and attain compliance with their associated requirements.	July 1, 2025
B. Respondent shall attain compliance with TOC TT requirements or proceed to complete Task D.	July 1, 2026
C. Respondent shall maintain compliance with TOC TT requirements or proceed to complete Task D.	July 1, 2027
D. If compliance with TOC TT requirements is not attained and/or maintained, Respondent shall submit an approvable engineering report proposing a schedule, with actions and dates, for achieving and maintaining compliance. The approvable engineering report will be incorporated into an addendum to this Consent Order to ensure Respondent continues to make progress in	180 days after receiving notification from DEQ that Task D is required.

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addressing the cited violations.

27. The Oklahoma Environmental Quality Code, 27A O.S. §§ 2-3-502(B) and (K), authorize DEQ to seek penalties of up to Ten Thousand Dollars (\$10,000.00) per day. Based on the facts and circumstances of this case, DEQ assesses a total penalty of Nine Thousand Two Hundred Fifty Dollars (\$9,250.00). DEQ agrees to defer the entirety of the penalty amount, Nine Thousand Two Hundred Fifty Dollars (\$9,250.00), pending compliance with the due dates set forth in Paragraph 26 in this Consent Order. If Respondent fails to complete a task by the scheduled due date, the portion of the deferred penalty allocated in the table below becomes immediately due and payable. If Respondent completes a task by its due date, DEQ agrees to waive the portion of the deferred penalty allocated to that task in the table below. If compliance with the Choose an item. is attained or maintained by its respective due date, any remaining deferred penalty shall be waived.

TASK	AMOUNT DEFERRED
A	\$4,625.00
B	N/A
C	N/A
D	\$4,625.00

Payment shall be by check or money order payable to the Oklahoma Department of Environmental Quality (or ODEQ), showing the Case Number of this Consent Order, and delivered to:

Accounts Receivable
Financial and Human Resources Management
Oklahoma Department of Environmental Quality
P.O. Box 2036
Oklahoma City, OK 73101-2036

28. Respondent agrees that if Respondent fails to complete any of the task(s) by the specified due dates set forth in Paragraph 26 in this Consent Order, DEQ may assess stipulated penalties as follows:

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TASK	PENALTY PER DAY
A	\$420.00
B	N/A
C	N/A
D	\$210.00

Stipulated penalties begin to accrue on the day performance is due, with the total amount of stipulated penalties not to exceed Seventy-five Thousand Dollars (\$75,000.00).

29. If Respondent fails to pay any penalty, DEQ may bring a separate action for collection of the penalty in district court. An action by DEQ for the collection of a penalty does not affect Respondent's duty to complete the tasks required by this Consent Order.

GENERAL PROVISIONS

30. Respondent agrees to perform the requirements of this Consent Order within the time frames specified unless performance is prevented or delayed by events which are a "force majeure." For purposes of this Consent Order, a force majeure event is defined as any event arising from causes beyond the reasonable control of Respondent or Respondent's contractors, subcontractors, or laboratories that delays or prevents the performance of any obligation under this Consent Order. Examples are vandalism, fire, flood, labor disputes or strikes, weather conditions that prevent or seriously impair construction activities, civil disorder or unrest, and "acts of God." Force majeure events do *not* include increased costs of performance of the tasks agreed to in this Consent Order or changed economic circumstances. Respondent must notify DEQ in writing within fifteen (15) days after Respondent knows, or should have known, of a force majeure event that is expected to cause a delay in achieving compliance with any requirement of this Consent Order. Failure to submit notification within fifteen (15) days waives the right to claim force majeure.

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31. As used in this Consent Order, an “approvable” submission to DEQ shall be considered a final submission. That is, all preliminary discussions between DEQ and Respondent regarding the requirements of a submission must be concluded prior to the date the submission is due, so that the submission will be approvable as submitted. If the submission is not submitted in an approvable form by its due date, then the submission will be considered delinquent, and Respondent will be subject to the monetary penalties described in this Consent Order.

32. Upon their approval by DEQ, any final reports, plans, specifications, schedules, and attachments required under this Consent Order are incorporated into it and enforceable under it. Failure of Respondent to respond within a reasonable time to any errors, deficiencies, or other regulatory requirements identified by DEQ is a violation of this Consent Order.

33. No informal advice, guidance, suggestions, or comments by employees of DEQ regarding reports, plans, specifications, schedules, and other writings affect Respondent’s obligation to obtain written approval by DEQ when required by this Consent Order.

34. If Respondent is required to sample or test, Respondent agrees to give DEQ reasonable notice of the sampling or testing date and time and allow DEQ to observe and/or split-sample.

35. Unless otherwise specified, any report, notice, or other communication required under this Consent Order must be in writing and must be sent to:

For the Department of Environmental Quality

Isaac Sparks, District Representative
Public Water Supply Engineering and Enforcement Section
Water Quality Division
Oklahoma Department of Environmental Quality
P.O. Box 1677
Oklahoma City, OK 73101-1677

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For Respondent

Robert Armstrong, Chairman
Duncan Public Utilities Authority
P.O. Box 969
Duncan, OK 73534

36. This Consent Order is enforceable as a final order of the Executive Director of DEQ. DEQ retains jurisdiction of this matter for the purposes of interpreting, implementing, and enforcing the terms and conditions of this Consent Order and for the purpose of resolving disputes.
37. Nothing in this Consent Order limits DEQ's right to take enforcement action for violations discovered or occurring after the effective date of this Consent Order.
38. Nothing in this Consent Order excuses Respondent from its obligation to comply with all applicable federal, state, and local statutes, rules, and ordinances. Respondent and DEQ agree that the provisions of this Consent Order are considered severable, and if a court of competent jurisdiction finds any provisions to be unenforceable because they are inconsistent with state or federal law, the remaining provisions will remain in full effect.
39. Respondent agrees to notify all potential purchasers of the property that the obligations under this Consent Order are binding on the purchaser. Within ten (10) days of the sale of the property, Respondent will notify DEQ of the sale and provide the name and address of the purchaser to DEQ.
40. The provisions of this Consent Order apply to and bind Respondent and DEQ and their officers, directors, employees, agents, successors, and assigns. No change in the ownership or corporate status of Respondent will affect Respondent's responsibilities under this Consent Order.
41. Compliance with the terms and conditions of this Consent Order fully satisfies Respondent's liability to DEQ for all items of noncompliance in this Consent Order. If Respondent satisfies the

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requirements of this Consent Order, DEQ will not pursue any other remedy, sanction, or relief that might otherwise be available to address the issues of noncompliance in this Consent Order.

42. This Consent Order is for the purpose of settlement. Neither the fact that Respondent and DEQ have agreed to this Consent Order, nor the Findings of Fact and Conclusions of Law in it, shall be used for any purpose in any proceeding except the enforcement by Respondent and DEQ of this Consent Order and, if applicable, a future determination by DEQ of eligibility for licensing or permitting. As to others who are not parties to this Consent Order, nothing contained in this Consent Order is an admission by Respondent of the Findings of Fact or Conclusions of Law, and this Consent Order is not an admission by Respondent of liability for conditions at or near the facility and is not a waiver of any right, cause of action, or defense Respondent otherwise has.

43. Respondent and DEQ agree that the venue of any action in district court for the purposes of interpreting, implementing, and enforcing this Consent Order will be Oklahoma County, Oklahoma.

44. The requirements of this Consent Order will be considered satisfied, and this Consent Order terminated, when Respondent receives written notice from DEQ that Respondent has demonstrated that all the terms of the Consent Order have been completed to the satisfaction of DEQ, and that any assessed penalty has been paid.

45. Respondent and DEQ may amend this Consent Order by mutual consent. Such amendments must be in writing and the effective date of the amendments will be the date on which they are filed by DEQ.

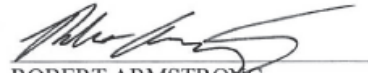
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46. The individuals signing this Consent Order certify that they are authorized to sign it and to legally bind the parties they represent.

47. This Consent Order becomes effective on the date of the later of the two signatures below.

FOR RESPONDENT:

**OKLAHOMA DEPARTMENT
OF ENVIRONMENTAL
QUALITY:**


ROBERT ARMSTRONG
Chairman

Date: March 6, 2025

for Madison B. Miller 4-11-25
ROBERT D. SINGLETARY
Executive Director

Date: 4-11-25