



REGION 6

DALLAS, TX 75270

April 10, 2026

TRANSMITTED VIA E-MAIL

Robert White
Town of Willow
P.O. Box 55
Willow, OK 73673
townofwillow@swoi.net

Re: PWS ID Number: OK2002801
Administrative Order, Docket Number: SDWA-06-2026-1331

Dear Mr. White:

Enclosed is an Administrative Order (AO) issued by the United States Environmental Protection Agency (EPA) to the Town of Willow. The AO requires the Town of Willow (Respondent) to comply with the provisions set forth in the attached Order within thirty (30) days of the effective date of the AO. The EPA requests that the Respondent immediately confirm receipt of this letter and the attached AO via e-mail response to young.craig@epa.gov.

The AO finds that you own or operate Willow, a "public water system" as defined by the Safe Drinking Water Act (SDWA), and are, therefore, subject to its requirements. EPA also finds that Willow failed to develop and submit an initial service line inventory to the State of Oklahoma by the October 16, 2024, deadline established in the Lead and Copper Rule Revisions (LCRR) and Lead and Copper Rule Improvements (LCRI). The enclosed AO requires the submission of your initial service line inventory to bring your water system into compliance with this requirement.

This AO does not assess a monetary penalty; however, it does require compliance with applicable SDWA regulations. Please be aware that failure to comply with this AO may subject Respondent to additional enforcement action by EPA, including the initiation of legal proceedings to seek monetary penalties.

EPA is committed to ensuring compliance with the requirements of the SDWA program and my staff will assist you in any way possible. Please reference AO Docket Number SDWA-06-2026-1331 in your response.

If you have any questions, please contact Craig Young of my staff, at 214-665-2275 or young.craig@epa.gov.

Sincerely,



Cheryl T. Seager, Director
Enforcement and
Compliance Assurance Division

Enclosures

cc: mark.stasyszen@deq.ok.gov
siobhan.gibbons@deq.ok.gov
lisa.stewart@deq.ok.gov
DWLC@deq.ok.gov
rodriguez.jose@epa.gov

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 6

In the Matter of	§	
	§	
	§	
Town of Willow	§	
	§	
	§	Docket No. SDWA-06-2026-1331
	§	
	§	
Respondent	§	
	§	
PWS ID #: OK2002801	§	

ADMINISTRATIVE ORDER

STATUTORY AUTHORITY

The following findings are made, and Order issued, under the authority vested in the Administrator of the United States Environmental Protection Agency (EPA), by Section 1414(g) of the Safe Drinking Water Act (SDWA or the Act), 42 U.S.C. § 300g-3(g). The Administrator delegated the authority to issue this Order to the Regional Administrator of EPA Region 6, who delegated such authority to the Director of the Enforcement and Compliance Assurance Division.

FINDINGS

1. Town of Willow (Respondent) is a “person,” as defined by Section 1401(12) of the Act, 42 U.S.C. § 300f(12).
2. At all times relevant to the violations alleged herein (relevant time period), Respondent owned or operated a public water system (PWS), as defined by Section 1401(4) of the Act, 42 U.S.C. § 300f(4), located in Willow, Greer County, Oklahoma, (facility), designated as PWS Identification Number OK2002801, and known as the Willow.
3. Respondent is a “supplier of water,” as defined by Section 1401(5) of the Act, 42 U.S.C. § 300f(5)
4. During the relevant time period, Respondent’s PWS provided water for human consumption and regularly served at least fifteen service connections used by year-round residents or regularly served at least twenty-five individuals year-round and was therefore a “community water system” (CWS), as defined by Section 1401(15) of the Act, 42 U.S.C. § 300f(15). Respondent was therefore subject to the requirements of the Act and the National Primary Drinking Water Regulations, 40 C.F.R. Part 141.
5. EPA promulgated the original Lead and Copper Rule (LCR), 40 C.F.R. § 141.80 et seq., in 1991.

6. On January 15, 2021, EPA promulgated the Lead and Copper Rule Revisions (LCRR). On December 6, 2023, EPA published the proposed Lead and Copper Rule Improvements (LCRI) and finalized the LCRI on October 8, 2024.
7. The EPA Administrator signed the final LCRI on October 7, 2024, and it was published in the Federal Register on October 30, 2024. The 2024 LCRI supersedes the Lead and Copper Rule Revisions (LCRR). The LCRI modified most of the requirements in the LCRR and established a compliance date of November 1, 2027, for those provisions. The LCRI also incorporated select provisions from the 2021 LCRR, including the October 16, 2024, compliance deadline for initial service line inventories.
8. Until a State, Tribe, or Territory has primary enforcement authority for a new or revised National Primary Drinking Water Regulation (NPDWR), such as the LCRR and LCRI, pursuant to SDWA Section 1413, 42 U.S.C. § 300g-2, only the EPA can enforce the NPDWR pursuant to SDWA Section 1414, 42 U.S.C. § 300g-3(a). In addition, when the State does not have primacy for a new or revised rule, the EPA Regional Administrator is the primacy agency for purposes of implementation of the NPDWR pursuant to 40 C.F.R. 141.2.
9. The Oklahoma Department of Environmental Quality (ODEQ) administers the Public Water System Supervision Program in Oklahoma pursuant to Section 1413 of the SDWA. However, EPA currently has primary enforcement responsibility for the SDWA LCRR and LCRI.
10. As required by 40 C.F.R. § 141.84(a) (service line inventory), a water system must develop a service line inventory that identifies the materials of all service lines connected to the public water distribution system. PWSs were required to develop and submit to the State an initial service line inventory by October 16, 2024, pursuant to 40 C.F.R. § 141.84(a)(1) and § 141.90(e)(1) (reporting requirements).
11. Respondent failed to develop and submit its required initial service line inventory to the State by the October 16, 2024, deadline. Respondent is, therefore, in violation of 40 C.F.R. §§ 141.84(a) and 141.90(e).
12. Failure to develop an initial inventory by October 16, 2024, requires Tier 2 Public Notification pursuant to 40 C.F.R. Subpart Q of Part 141, Appendix A (public notification of drinking water violations). Pursuant to 40 C.F.R. § 141.203(b)(1), public water systems must provide Tier 2 Public Notification as soon as practical, but no later than 30 days after the violation is determined.
13. Failure to submit an initial inventory to the State by October 16, 2024, requires Tier 3 Public Notification pursuant to 40 C.F.R. Subpart Q of Part 141, Appendix A (public notification of drinking water violations). Pursuant to 40 C.F.R. § 141.204(b)(1), public water systems must provide Tier 3 Public Notification not later than one year after the violation is determined.
14. Respondent failed to provide Tier 2 Public Notification and Tier 3 Public Notification to the persons it serves, as required by 40 C.F.R. Subpart Q of Part 141.

SECTION 1414(g) COMPLIANCE ORDER

Based on the foregoing findings and pursuant to the authority of Section 1414(g) of the Act, 42 U.S.C. § 300g-3(g), EPA orders that Respondent take the following actions:

- A. Within thirty (30) days of the effective date of this Order, Respondent shall complete and submit its initial service line inventory, as required by 40 C.F.R. §§ 141.84(a) and 141.90(e).
- B. Within thirty (30) days of completing its initial service line inventory, Respondent shall inform all persons served at the service connection of lead service lines, galvanized requiring replacement, or lead status unknown service lines pursuant to 40 C.F.R. § 141.85(e)(1). Content of the notice must be in accordance with 40 C.F.R. § 141.85(e)(3) and must be provided by mail or another method approved by the State.
- C. Within thirty (30) days of the effective date of this Order, Respondent shall provide a Tier 2 Public Notification for the failure to develop its initial service line inventory, in accordance with 40 C.F.R. Subpart Q of Part 141. Respondent shall also provide a copy of all public notifications to EPA and ODEQ within forty (40) days of the effective date of this Order.
- D. Within one (1) year of the effective date of this Order, Respondent shall provide a Tier 3 Public Notification for the failure to submit its initial service line inventory to the State, in accordance with 40 C.F.R. Subpart Q of Part 141. Respondent shall also provide a copy of all public notifications to EPA and ODEQ within one (1) year and ten (10) days of the effective date of this Order.
- E. If Respondent is technically unable to complete and submit its initial service line inventory to the State within thirty (30) days of the effective date of this Order, Respondent shall submit to EPA, with a copy to ODEQ, a proposed plan, including a schedule, to achieve compliance. The plan shall be submitted to EPA for review and approval within thirty (30) days of the effective date of this Order.
- F. The reporting required by this Order must be provided by Respondent to EPA and ODEQ at the following addresses:

Craig Young, Enforcement Officer
Enforcement and Compliance Assurance Division (6EN-WR)
U.S. EPA, Region 6
1201 Elm Street, Suite 500
Dallas, TX 75270-2102
young.craig@epa.gov

Mark Stasyszen, Drinking Water Administrator
Oklahoma Department of Environmental Quality
Water Quality Division
707 N Robinson
Oklahoma City, OK, 73102
mark.stasyszen@deq.ok.gov

GENERAL PROVISIONS

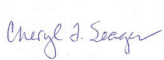
This Order is effective upon receipt by a representative of the Respondent.

Respondent may seek federal judicial review of the Order pursuant to Chapter 7 of the Administrative Procedure Act, 5 U.S.C. §§ 701-706.

This Section 1414(g) Order does not constitute a waiver, suspension, or modification of the requirements of 40 C.F.R. Part 141 or other applicable federal and state requirements, which remain in full force and effect. Issuance of this Section 1414(g) Order is not an election by EPA to forego any civil or any criminal action otherwise authorized under the Act.

Violation of any term of this Section 1414(g) Order may subject Respondent to an administrative civil penalty of up to \$49,848 under Section 1414(g) of the Act, 42 U.S.C. § 300g-3(g), or a judicial civil penalty of up to \$71,545, assessed by an appropriate United States District Court under Section 1414(g)(3)(A) of the Act, 42 U.S.C. § 300g-3(g)(3)(A).

This Order shall be binding on the Respondent cited herein and all its successors and assignees. No change in ownership of the PWS shall alter the responsibility of the Respondent under this Order.



Digitally signed by
CHERYL SEAGER
Date: 2026.04.10
10:32:53 -05'00'

Cheryl T. Seager, Director
Enforcement and
Compliance Assurance Division