Oklahoma

Progress Report to the Governor on the Capacity Development Program

1. Introduction

Congress amended the Safe Drinking Water Act (SDWA) in 1996, enabling a variety of initiatives to assist States and public water systems in providing safe drinking water. As amended, the SDWA established capacity development (CD) with the intent of focusing on those systems most in need of assistance, primarily very small systems serving populations of 3,300 or less. CD is the process by which the State of Oklahoma assures that drinking water systems acquire and maintain the *technical*, *managerial*, and *financial* (*TMF*) capabilities to successfully operate.

All States are currently implementing state-specific CD programs tailored to meet water systems' needs. As required in Section I of Oklahoma's Capacity Development Strategy Document (Strategy), the Department of Environmental Quality (DEQ) must submit an annual report to the Environmental Protection Agency (EPA). This report reflects the efficacy of the Strategy by detailing improvements in the *TMF* capabilities of the State's public water systems. The annual progress report is available on the DEQ website at http://www.deq.state.ok.us.

A public water system (PWS) is defined as a system that provides water via piping or other constructed conveyances for human consumption to at least 15 service connections or serves an average of at least 25 people for at least 60 days each year.

There are three types of PWSs:

1. Community (such as towns);
2. Non-transient non-community (such as schools or factories); and
3. Transient non-community systems (such as rest stops or parks).

Of the 1,641 active PWSs in Oklahoma:

- 198 systems use surface water as their primary source;
- 763 use groundwater as their primary source;
- 540 purchase from surface water systems;
- 10 purchase from groundwater under the influence of surface water systems;
- 122 purchase from groundwater systems; and
- 8 use groundwater under the influence of surface water as their primary source.

Of the 1,641 PWSs in Oklahoma:

- 1,094 are community water systems;
- 104 are non-transient non-community; and
- 443 are non-community water systems.

DEQ has the statutory authority to ensure that all water supply systems have adequate *TMF* capabilities prior to the construction of a public water facility in Oklahoma.

These capabilities are partly assessed via two DEQ regulatory directives. One directive derives from OAC 252-626 Public Water Supply Construction Standards [reference http://www.deq.state.ok.us/rules/626.pdf], which states that a PWS must receive a "Permit-to-Construct" from DEQ prior to initiating construction. Another directive requires all operators of a Public Water Supply (PWS) system to be licensed by DEQ, according to OAC 252:710 Waterworks and Wastewater Works Operator Certification [reference http://www.deq.state.ok.us/rules/710.pdf].

DEQ's CD program relies on the success of its enforcement and compliance programs. These two programs are partially funded through the DWSRF Public Water System Supervision program (10% State Program Management Set-Aside) and the 15% Local Assistance and Other State Programs Set-Aside. Funding information is detailed in Oklahoma's *DWSRF SFY11 Administrative Set-Aside Workplan 2010 Capitalization Grant*. Note that SFY11 for the

State of Oklahoma is from July 1, 2010 to June 30, 2011.

2. Enforcement and Compliance Mechanisms

DEQ maintains a strong enforcement program that particularly addresses systems with multiple violations of SDWA requirements. Such systems are referred to DEQ enforcement staff for analysis of the circumstances of the violations. A course of action is then implemented to prevent enforcement escalation to the Significant Non-Compliance (SNC) list.

A *Notice of Violation* (NOV) is the first formal enforcement document issued to facilities upon failure to meet DEQ rules or regulations. Violations address matters such as monitoring and operating procedures, as well as construction deficiencies. If it is determined that the system is not likely to regain compliance within a period of three months, DEQ's PWS District Engineer (DE) prepares a *Consent Order* (CO). The CO is a mutual agreement between DEQ and the affected system. The CO cites the system's responsibilities, the deadline for returning to compliance, and the fines that may be levied against the system as a result of non-compliance.

An *Administrative Consent Order* (ACO) is issued when time is limited and there is a significant health hazard, or a water system refuses to agree to the terms of the CO. In an ACO, DEQ determines what tasks need to be completed and sets deadlines for the completion of these tasks. Both the CO and the ACO stipulate the penalties for failing to meet the required deadlines. Boil Advisories are usually issued to systems that have "acute" or "fecal positive" bacteriological violations. Boil Advisories require immediate notice to all consumers in order to inform the public of how to produce water that is safe for human consumption.

In calendar year 2010, DEQ issued 2,440 enforcement actions, which consisted of:

- 2,116 informal enforcement letters;
- 319 NOVs and Cos;
- 0 ACOs; and
- 5 Boil Advisories.

A total of 1,222 systems were returned to compliance during calendar year 2010.

3. Capacity Development Program Coordinator

The Capacity Development Coordinator (CDC) facilitates efforts of the CD program in Oklahoma. The CDC is responsible for fostering the relationship between the various DEQ drinking water programs in the directive to increase *TMF* capabilities. For example, the CDC prepares and oversees the contract between DEQ and the ORWA to provide training for the licensing of water system operators. This requires coordination with DEQ Operator Certification Program whose responsibility is to assure that the training provided adequately addresses the *technical* aspects of water system operation.

4. Water Quality Efforts and Participation

A. ***Regionalization/Consolidation*** - DEQ continues its efforts to identify new and existing water systems that may benefit from regionalization/consolidation into larger water systems. Systems will be considered for regionalization/consolidation that:

- Have source water capacity limitations (drought);
- Are undergoing DEQ enforcement proceedings;
- Are considering giving away, selling, or abandoning the system; or
- Have expressed interest in consolidation.

In SFY11, eleven water systems joined neighboring water systems. Two examples are:

- Choctaw Housing/Talihina is now a part of Pushmataha County Rural Water District #2; and
- Tulsa County Rural Water District #1 is now a part of Sand Springs.

Also in SFY11, the DWSRF offered principal forgiveness for entities agreeing to regionalize. This satisfies EPA's requirement that at least 30% of the annual capitalization grant provide additional subsidization. Two water systems were offered principal forgiveness for consolidation or regionalization:

- The Town of Carmen is considering accepting subsidization.
- The Adair Municipal Authority accepted $332,000 as a regionalization subsidy to help pay for a 12-inch water line connecting them to Mayes County Rural Water District #6.

Regionalization/consolidation efforts will continue in the State, aimed at achieving the best and most reliable service at reasonable rates for the long-term benefit of the customers.

B. The ***Funding Agency Coordinating Team*** **(FACT)**, hosted by the Oklahoma Rural Water Association (ORWA), is comprised of the following state and federal water and wastewater project funding agencies:

- Oklahoma Department of Environmental Quality;
- Oklahoma Department of Commerce;
- Oklahoma Water Resources Board (OWRB);
- Indian Health Service;
- U.S. Department of Agriculture – Rural Development;
- Oklahoma Association of Regional Councils;
- Community Resource Group; and
- EPA.

FACT meets quarterly to discuss the status of Oklahoma communities identified in DEQ's enforcement list. Attention is given to water systems with the greatest need so funding is received as quickly as possible. Representatives of water and wastewater systems are invited to attend quarterly meetings to better determine which lending agencies best suit the systems' *financial* needs. These systems provide feedback by voluntarily completing a brief survey immediately following the FACT meeting and a follow-up survey solicited by DEQ some time prior to the next FACT meeting. All survey responses have been positive and helpful in refining the direction of subsequent FACT meetings.

Figure 1 – FACT meeting

FACT provides a single uniform method for requesting funding and regulatory approvals. It offers guides, checklists, and forms that are accepted by all FACT-participating agencies. DEQ has been a member of FACT since its inception in the early 1990s.

Table 1 lists the tools currently in use in Oklahoma to assess TMF capabilities.

Tool	*Technical*	*Managerial*	*Financial*
Construction Permitting	X		
PWS Enforcement	X	X	
Operator Certification	X		
SWAP	X	X	
AWOP	X	X	X
DWSRF	X	X	X
Small System TA	X	X	X
Sanitary Survey	X		
Check-Up Program for Small Systems (CUPSS)		X	X
Regional-ization	X	X	X
FACT		X	X
EPDG	X		
Rate Studies			X

Table 1 – Oklahoma's Capacity Development tools.

5. Water Quality Programs

A. The ***Construction Permitting Program*** assures *technical* adequacy by reviewing water system construction plans and specifications. This *technical* review helps determine the sufficiency of the source water and the water system infrastructure.

B. The ***PWS Enforcement Program*** also assures the *technical* capabilities of water systems by reviewing engineering reports on proposed construction projects, and by providing *technical* training to water systems. This assistance encompasses *technical* operation and security and addresses *managerial* capabilities by providing training to water system managers. It is the role of the CDC to coordinate and document the efforts of all of DEQ's drinking water programs and ensure *TMF* capabilities statewide.

C. The ***Operator Certification Program*** is charged with training and licensing persons working in water and wastewater facilities in the State. Programmatic oversight helps to ensure that operators have the training to properly treat and monitor drinking water supplied to the public. Through a contractual agreement with DEQ, ORWA provides the study material and training for operators of non-transient non-community (NTNC) water facilities. The examinations for NTNC operators are administered by the ORWA by means of a DEQ contract. During SFY11, all 1,641 public water supply systems, including 104 NTNC systems, had available an appropriately licensed operator in responsible charge [reference SFY11 Oklahoma Operator Certification Annual Report].

In addition to the training offered by DEQ, training is available in classroom settings and on the worldwide web. As examples, the ORWA, Rose State College, and the American Water Works Association offer DEQ-approved training classes for environmental professionals. DEQ offers written exams, rotating through seven regions of the State annually.

D. The ***Source Water Assessment Program (SWAP)*** provides a focus on water quality anti-degradation and protection of beneficial uses for both surface and ground waters.

The SDWA Amendments requires development and implementation of a SWAP to analyze existing and potential threats to the quality of the public drinking water throughout the state. DEQ maintains approval from the EPA to administer the SWAP program. The SWAP

program in Oklahoma was developed utilizing EPA's *Source Water Assessment and Protection Programs Guidance*, and is currently funded through a DWSRF set-aside (Local Assistance – DEQ program code 242). SWAP assessments include the following:

- Delineation of the source water protection area;
- Inventory of the potential contaminant sources within the area;
- Determination of the susceptibility of the PWS to contamination from the inventoried sources; and
- Release of the results of the assessments to the public.

Utilizing this information, a water system can more effectively plan the location of its next well. Existing data are utilized to develop draft plans that are physically verified by DEQ field staff in the Environmental Complaints and Local Services (ECLS) Division.

Figure 2 is an example of the type of map that can be generated for community public water supplies.

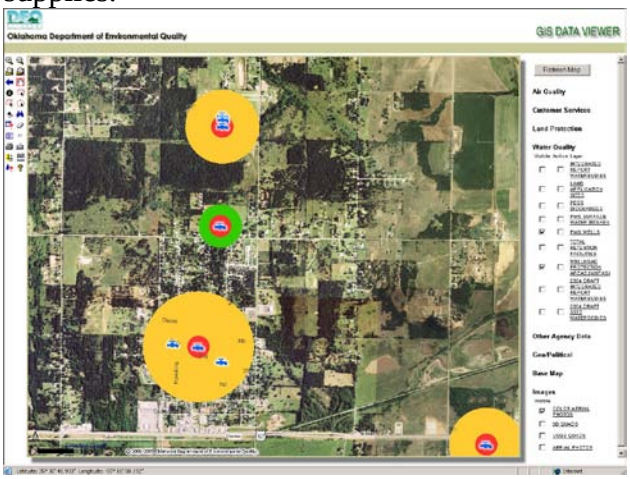

Figure 2 - Sample map indicating location of well and wellhead protection areas.

DEQ updates SWAP assessment data, which is made available by ECLS in a final report for each system. To ensure security for drinking water supplies, the dissemination of the complete report is determined by the individual system. However, the data is summarized in the water system's annual Consumer Confidence Report, which identifies the system's vulnerability and susceptibility score; this report is available for public review.

Currently, most regulated discharges, wells, surface intakes, and other planning information can be found on the DEQ website. This is available through an interactive mapping system that allows the user to view any combination of items on the map. This mapping program is similar to other mapping programs, but differs in that it also presents aerial photographs. A map may be viewed that includes the system's water source (ground or surface) and all known contaminants located within a defined distance from the proposed well site.

The state of Oklahoma is among the 43 states currently participating in the Source Water Protection Program (SWPP). SWPP is a joint project by the U.S. Department of Agriculture's Farm Service Agency and the nonprofit National Rural Water Association. It is designed to help prevent source water pollution through voluntary practices installed by producers at the local level. DEQ, as primacy agency for Source Water Protection in Oklahoma, attends and advises at the *Source Water Protection Workshop* hosted by the Oklahoma Rural Water Association. The primary objective of the workshop is to identify high priority Source Water Protection areas in the state and coordinate input from:

- DEQ
- OWRB
- Oklahoma Corporation Commission
- Oklahoma Department of Wildlife Conservation
- Rural Water Districts

E. The ***Area-Wide Optimization Program (AWOP)*** was piloted in April 1999 in Oklahoma for EPA Region 6. This program started as a multi-state effort to optimize particle removal

and disinfection capabilities of filtration water treatment plants. The goal of AWOP is to maximize public health protection from disease-causing microbial contaminants by identifying performance problems in the water system. Following the AWOP model is one of the most cost-effective, economical ways a drinking water system can improve their ability to produce safe drinking water. Water systems having the most trouble with their filtration treatment are identified and prioritized in terms of their need for assistance.

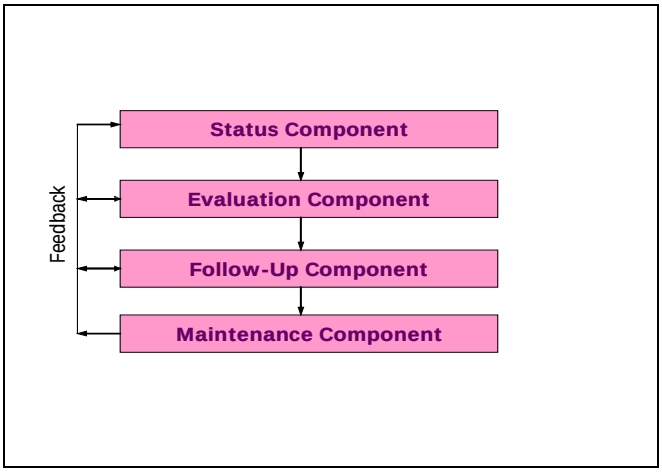

Figure 3 – AWOP model.

As demonstrated in *Figure 3*, the AWOP model consists of four components: status, evaluation, follow-up, and maintenance. The AWOP model provides a framework for each individual state to develop and sustain a meaningful optimization program. The national AWOP has modified this model to combine the Evaluation and Follow-Up components into one component called Targeted Performance Improvement.

As part of the follow-up component strategy of AWOP, Targeted Technical Assistance (TTA) is being implemented in Oklahoma. TTA is an approach designed to help water systems comply with the Disinfectant/Disinfection By-Products (DBP) Rule, which became effective in 2004. DBP ingestion by humans has been shown to cause cancer and to adversely affect the liver, kidney and central nervous system. TTA was piloted nationally in Nowata, OK in October of 2004. To-date, TTA has been conducted at twelve water systems in Oklahoma.

The most recent approach being promoted by AWOP in lieu of TTA is performance based training (PBT). PBT is a transfer of priority setting and problem solving skills to plant staff to initiate changes at a water plant.

PBT is presented in six sessions:

- Session 1: Performance Goals and Monitoring.
- Session 2: Problem Solving Skills Development & Total Organic Carbon (TOC) Removal.
- Session 3: Distribution System Assessment and Related Special Studies.
- Session 4: Performance Trending and Disinfectants/Disinfection By-Products (D/DBP) Control Strategies.
- Session 5: Application of D/DBP Control Strategies and Special Studies.
- Session 6: Reporting on Success.

The Oklahoma PBT program is conducted over a 12-to-15 month period with up to six systems meeting in a classroom setting each quarter. The goal of PBT is to address unique performance limiting factors in order to achieve optimized performance (i.e., better than regulations require). PWS DEs facilitate this program with individual plants to keep them on schedule and working on action items between training sessions. DEQ began DBP-PBT at 15 water systems in SFY07. The DBP-PBT six-session training was completed at the following six water systems in SFY09: Okmulgee, Henryetta, Okemah UA, Barnsdall, Pawhuska, and Osage County Rural Water District #20 (Hulah). The DBP-PBT six-session training was completed at the following four water

systems in SFY10: Lone Chimney Water Association, Perry, Newkirk, and Noble County RWD #1. A total of ten water systems completed the DBP-PBT training sessions. The Oklahoma AWOP team was the only EPA Region VI AWOP participant that has elected to fully implement the DBP-PBT approach.

EPA Region 6 and Process Applications, Inc. in Fort Collins, CO, have assisted in the development of AWOP. The States of Arkansas, Louisiana, Texas, New Mexico, Iowa and Oklahoma are participants in the EPA Region 6 AWOP group. DEQ continues its involvement in AWOP by attending quarterly regional and national meetings and by participating in and hosting multi-state comprehensive performance evaluations (CPEs).

Since 1997, DEQ has conducted CPEs of water systems in the state. The original scope of the CPE was to assist the community and to train engineers in understanding the intricacies of water treatment. A CPE provides analysis of the facility's design capabilities and a system's administrative, operational, and maintenance practices. Following the CPE, the participating water system receives a report within 60 days from DEQ that outlines factors that may influence the optimization of its treatment operations.

A CPE was conducted at the public water supply for the City of Cleveland, OK in August 2010, and for the City of Durant, OK in November 2010. From 1997 to the present, DEQ has performed 20 CPEs in the State of Oklahoma.

F. The ***Drinking Water State Revolving Fund Loan Program*** was established by the 1996 SDWA Amendments, which allowed EPA to make a capitalization grant to Oklahoma to fund the DWSRF loan program. This program, co-managed by DEQ and OWRB, is dedicated to providing low-interest loans to upgrade public water system infrastructures. It is designed to help those in greatest need based on a priority system that places a primary emphasis on drinking water quality. Along with PWS DEs, DWSRF Project Engineers assure the *technical* capabilities of water systems by reviewing engineering reports on proposed construction projects.

Currently, 36 water systems are on the DWSRF Project Priority List for a total of almost $300 Million in projects to be funded within the next few years. DWSRF applicants are assisted throughout the planning, design, bidding, contracting and construction phases of their project by DEQ engineers and environmental specialists. Applications for the DWSRF program are accepted at any throughout the year.

From 1998 to the present, the program has entered into binding commitments totaling over $637,553,900.00 to fund a total of 116 water system upgrades. In addition to funding infrastructure improvements, the program funds the CD, Small System Technical Assistance, and SWAP programs, and partially funds the PWS Program.

G. The ***Small System Technical Assistance Program*** in Oklahoma is provided for by contractual agreements. In SFY11, DEQ contracted with the Utility Assistance and Services, Inc. (UAS) and ORWA to provide *TMF* assistance to water systems in the State.

ORWA provides the following operator certification training classes/services:

- Renewal;
- Certification;
- Security/Emergency Response;
- Drinking Water Regulations;
- Lab Certification; and
- Exam Monitoring.

In SFY11, ORWA provided a total of 82 training classes and monitored 22 exams.

UAS offers *technical* assistance to systems referred by PWS, but also helps develop the *managerial* and *financial* capabilities of water systems. This is accomplished by evaluating rate structures, developing operational and *financial* recordkeeping and accounting or billing systems. UAS also develops budgets and internal fiscal controls, and assists in the preparation of funding applications. In SFY11, UAS assisted a total of 36 water systems.

Systems receiving assistance must serve populations 10,000 and fewer and be identified by DEQ as a program with specific regulatory deficiencies. Preference is given to those on the current DWSRF Project Priority List.

H. The PWS ***Sanitary Survey Program*** is implemented by DEQ, in cooperation with EPA Region 6. The ECLS and WQD field staff is trained to properly conduct sanitary surveys, as they are responsible for conducting PWS inspections. Using the knowledge gained from the training, ECLS staff inspects surface water systems quarterly and ground water systems semiannually. A total of 2,784 PWS monitoring inspections were performed by ECLS in SFY11.

6. Challenges to Oklahoma's Capacity Development Strategy

Mile for mile, Oklahoma offers the nation's most diverse terrain. It is one of only four states with more than ten ecoregions, and has by far the most per mile in America. Oklahoma's ecoregions – or, terrains/subclimates – include everything from Rocky Mountain foothills to cypress swamps, tallgrass prairies, and hardwood forests to pine-covered mountains. Each is graced with wide blue lakes, rivers and streams. Additionally, there is one man-made type of terrain: urban turf.

Many of the systems that have been placed on the SNC list are small groundwater systems with nitrate levels above the allowable level. Management approaches include removing the problem wells, blending the water with water having a lower nitrate concentration, and purchasing water from another water system. If these options will not work, the system must lower the nitrate concentration through treatment. Many of the systems are unable to afford this option and continue to be in violation of SDWA.

EPA sets national limits on contaminant levels in drinking water to ensure that the water is safe for human consumption; these limits are known as maximum contaminant levels (MCLs). For some regulations, EPA establishes treatment techniques (TTs) in lieu of an MCL to control unacceptable levels of contaminants.

Figure 4 shows the yearly trend in the percentage of systems in Oklahoma reporting no MCL or TT violations.

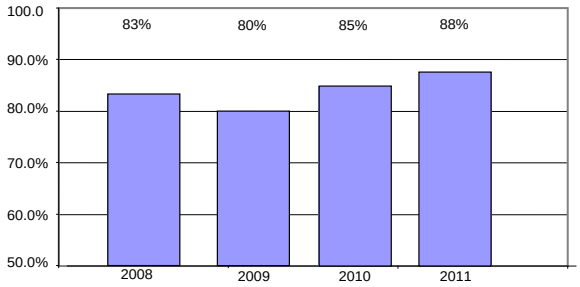

Figure 4 - Percent of Systems Reporting No Violations

The State of Oklahoma's PWS Program currently oversees 1,641 active entities that meet the federal definition of a PWS. Of these, 1,451, or 88%, reported no maximum contaminant level (MCL) violations or treatment technique (TT) violations.

Of the 1,641 PWSs in Oklahoma during the calendar year 2010:

- 28 systems had 68 violations for exceeding the nitrate MCL standard in at least one of their wells.
- 34 systems had 47 nitrate monitoring violations.

- 3 systems had 3 violations for exceeding the MCL of the inorganic chemical (IOC) contaminant group.
- 1 system had 1 violation for IOC group monitoring.
- 2 systems had 6 volatile organic chemical (VOC) contaminant group MCL violations.
- 0 systems had synthetic organic contaminant (SOC) group MCL violations.
- 0 systems had SOC monitoring contaminant group violations.
- 8 systems had 360 VOC contaminant group monitoring violations.
- 89 systems had 336 violations of the Stage 1 Disinfectants and Disinfection Byproducts Rule (Stage 1 DBPR) MCL.
- 34 systems had 101 violations of the Stage 1 DBPR TT requirement.
- 43 systems had 105 monitoring violations for the Stage 1 DBPR.
- 3 systems had 3 Total Coliform Rule (TCR) acute MCL violations.
- 5 mandatory Boil Orders were issued to systems that tested positive for fecal coliform or E-coli.
- 72 systems had 81 TCR MCL violations.
- 429 systems had 912 routine monitoring and reporting violations for TCR.
- 72 systems had 83 repeat monitoring violations for TCR.
- 7 systems had 27 violations for exceeding the MCL for arsenic.
- 2 systems had 2 violations for arsenic monitoring.
- 10 systems had 56 radionuclide MCL violations.

All surface water PWSs in Oklahoma are required to provide filtration. None of the 198 surface water systems violated the Surface Water Treatment Rule (SWTR) for TT. None of the systems were in violation for SWTR monitoring and reporting. None of the systems had Filter Backwash Recycle Rule violations for TT or monitoring and recordkeeping. There were 41 turbidity TT violations by 19 systems for Interim Enhanced Surface Water Treatment Rule (IESWTR). There were 6 monitoring and reporting violations by 1 system for IESWTR.
No system had TT violations for the Lead and Copper Rule. 132 systems had 169 monitoring violations for the Lead and Copper Rule. During the calendar year 2010, water systems with violations were returned to compliance a total of 1,222 times.

Per Section I of The State of Oklahoma Capacity Development Strategy, DEQ ensures that new systems have *TMF* capabilities to provide safe and affordable drinking water. All new systems are referred to the CDC, who then assesses the system's *TMF* capabilities. The CDC then ensures that the system has an appropriately certified operator, notes the dates of sanitary surveys/inspections, determines if plans & specifications were submitted to and approved by DEQ, and makes TA referrals as indicated. A total of 32 new systems were identified by DEQ in SFY10: 27 active and 5 proposed.

7. Updates

The *Water and Wastewater Operators Public Search* feature, added to the DEQ website in SFY09, has been well received and greatly utilized.

Figure 5 - Public Search Icon

This feature allows a public search for certified water and wastewater operators, which increases in relevance as qualified operators become more difficult to find.

Searches can be made using the following parameters:

- Last name
- First name
- License number
- License type
- License class
- County of residence
- Employer name
- Employer county

To begin the search, select the icon shown (*Figure 5*) at the following URL: http://www.deq.state.ok.us/wqdnew/opcert/index.html.

8. Program Initiatives

Of the four pillars of EPA's ***Sustainable Infrastructure*** effort, "Full Cost Pricing," is the pillar that continues to receive primary focus in SFY11. This approach helps utilities recognize the full costs for providing service over the long-term and promotes implementing pricing structures that effectively recover costs and promote environmentally sound decisions by customers.

Using DWSRF set-aside funding, ***rate studies*** were provided for various small water systems and those applying for DWSRF funding whose loan application indicated the need for a rate study. Once usage data is entered into the rate study spreadsheet, several rate structures are offered for consideration by the water system governing body. Rate studies or revisions to previous rate studies were done for the following small drinking water systems:

- Town of Braman
- Lincoln County Rural Water District #4
- Shidler Public Works Authority
- Weleetka Public Works Authority
- Bryan County RWS SWMD #2
- Noble County Rural Water District #1 (Lucien)

Work plans (Appendix) were completed by UAS for all referred systems, and for selected new systems (as discussed in Section 2 of the Strategy) in the State.

EPA's ***Check Up Program for Small Systems*** (***CUPSS***) was promoted for use at water systems in Oklahoma. CUPSS is free, user-friendly software that helps small utilities manage and finance existing and future water (and wastewater) infrastructure. It is designed for use with systems serving populations 3,300 and fewer, which defines a very small system. Currently, 1,498 of the 1,641 systems in Oklahoma are classified as very small systems.

To facilitate an emphasis on EPA's Sustainable Infrastructure effort and other proposed programmatic changes, the CD Strategy document was revised in SFY09 and given concurrence by EPA Region 6. This revision also facilitated the creation of DEQ's Engineering Planning and Design Grant (EPDG) Program.

The ***EPDG Program*** was introduced to provide assistance to drinking water systems serving a population of 10,000 and fewer, as defined in OAC 252:633-1-5. Effective July 1, 2009, the EPDG Program is managed by the CDC and funded through a DWSRF set-aside. Applications were ranked and grant funds awarded quarterly to applicants with the highest priority points. Eligible expenses include engineering fees for engineering report, plans and specifications, environmental review documents, and applicable tests, analyses, and studies. The applicant may seek funding for construction from sources other than DWSRF.

The EPDG Program was set up in three phases:

1. *Phase 1 Scoping Report Form*
2. *Phase 2 Engineering Report*

3. *Phase 3 Plans & Specifications*

Following are the sub-grantees, listed by the quarter in which they were awarded:

- 1st Quarter – SFY10
    1. Pawnee PWA.
    2. Osage CO RWD #20 (Hulah).
    3. Salina PWA.
    4. Sardis Lake WA.
- 2nd Quarter – SFY10
    1. Locust Grove PWA.
    2. City of Shidler.
    3. Grandfield PWA.
    4. Weleetka PWA.
- 3rd Quarter – SFY10
    1. Beggs PWA.
    2. McIntosh CO RWD #8 (Texanna).
    3. Longtown RW&S District #1.
    4. Osage CO RWD #21.
- 4th Quarter – SFY10
    1. Stroud UA.
    2. Barnsdall PWA.
    3. Town of Carmen.
    4. Cleveland MA.

Longtown RW&S #1 (Longtown) was the first sub-grantee to complete all three phases of the EPDG Program. Longtown will be closing a loan with USDA – Rural Development (RD) on October 4, 2011 to fund the following three contracts:

1. Upgrading existing treatment plant and adding treatment capacity;
2. Adding 6-inch waterlines to increase flow and pressure to the west side of distribution system; and
3. Rehabilitating above-ground storage tanks to increase tank circulation.

Longtown procured funds from the following sources:

- EPDG - $125,000;
- RD – $4,062,000 loan/$1,594,450 grant; and
- Contributions resulting from a rate increase in Jan 2011.

Construction is expected to be complete by the end of 2012.

A SFY09 revision of the ***State Environmental Review Process*** enabled DEQ to make the determination of the appropriate environmental review process to be implemented on a case-by-case basis. If indicated, a system may submit an Environmental Assessment (EA) or draft EA instead of an Environmental Information Document. DEQ may also compose the draft and final EAs if the system serves populations of 10,000 and fewer, which is of great assistance to small water systems.

9. Success

Rogers County Rural Water District #6 (RWD6). The office of RWD6 is located in Inola, OK, with a population of 1,589 at the 2000 census. Taking its name from the Cherokee word for *black fox*, Inola is one of the few towns in Oklahoma where the horse-drawn wagons and buggies of Amish farmers can still be seen. The town styles itself as the "Hay Capital of the World."

RWD6 delivers purchased water to 1,000 residential customers via a water purchase contract with Rogers County Rural Water District #8 (RWD8). RWD8 purchases water from Oklahoma Ordnance Works Authority (OOWA), then sells water to RWD6 at an increased rate. RWD6 was in need of a long-term supply of competitively-priced drinking water in sufficient quantities to meet present and future demands.

RWD6 received DEQ assistance with a DWSRF loan application for a project that initially consisted of approximately 15 miles of new 12-inch PVC pipe to connect RWD6 directly to

OOWA. The loan for this project closed for the amount of $3 million dollars.

Figure 6 – RWD6 New Water Tank

Due to construction bids lower than projected, and efficient use of the available funding, RWD6 was able to expand the project to include:

- AMR;
- SCADA;
- New Water Tank & Altitude Valve Box;
- New Pump Station; and
- Hydrant Locks & Locking Hydrant Meter.

10. Recognition

As the Oklahoma DWSRF celebrates its 14th anniversary, it is acknowledged yet again by EPA as an outstanding and exceptional program. Oklahoma was the first state in EPA Region 6 to have construction contracts finalized before the February 17, 2010 deadline for the American Recovery and Reinvestment Act of 2009 (ARRA). Oklahoma was also one of the first two states to expend 100 percent of its allotted $30.2 Million for construction of ARRA projects at 24 water systems.

One ARRA recipient was awarded for their excellent water infrastructure project. The *DWSRF Award for Sustainable Health Protection* recognizes borrowers (nominated by the states) for their efforts to provide clean and safe drinking water. The award acknowledges the most innovative and effective drinking water projects that further the goal of clean and safe water through exceptional planning, management, and finance. The award recipient for 2010 went to the Wagoner Public Works Authority (Wagoner) for its creativity and dedication to public health protection.

Wagoner met very specific guidelines for this award, including financial integrity, public health benefits, affordability, and innovative financing. Instead of contracting the work, Wagoner saved money by utilizing its very competent and willing staff.

11. Summary and Future Plans

The CDC will be revising the CD Strategy Document to EPA for concurrence in SFY12. The revision will include updating regulatory citations and will include language to incorporate EPA's *Sustainability Policy* to support increasing the sustainability of water infrastructure in Oklahoma.

The continued success of Oklahoma's CD program is dependent on the efforts of the PWS Enforcement Unit, Operator Certification Unit, DWSRF staff, TA groups, and the various agencies represented by FACT. AWOP, SWAP, and Small System Technical Assistance are programs that will continue to improve the quality of drinking water provided to citizens of Oklahoma.

12. References

Oklahoma Capacity Development Strategy Document

SFY11 Administrative Set-Aside Workplan 2010 Capitalization Grant

2010 State of Oklahoma Public Water Supply Program Annual Compliance Report

http://www.travelok.com/atv/index.asp

http://en.wikipedia.org/wiki/Ecoregion

http://www.inolachamber.com/

APPENDIX

Work Plan for DWSRF Projects and Consent Order Referrals

Establish written policies:

- Purchase orders
- Emergency response
- Budget
- Termination of non-payment
- Recordkeeping

Prepare/establish:

- Monthly financial reports
- Monthly written operational report
- Emergency contact information
- Regular office hours
- Written application for new services
- Customer complaint log
- Reserve account(s)
- Procedures for annual rate review

Assure appropriate operator licensure
Assure appropriate board member training has been attended
Assure that security vulnerability assessment has been completed
Determine if all customer services are metered
Procure annual audit
Review insurance coverage
Conduct on-site staff interviews
Identify funding sources
Evaluate potential for regionalization