



CAPACITY DEVELOPMENT PROGRAM ANNUAL REPORT

Oklahoma Dept. of Environmental Quality

State Fiscal Year 2026



OKLAHOMA
Environmental
Quality

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Table of Contents

Table of Contents.....	1
Table of Figures	2
Introduction	3
Enforcement and Compliance Mechanisms	3
ETT Implementation.....	5
Capacity Development Program.....	6
Challenges to Oklahoma’s Capacity Development Strategy	6
Water Quality Efforts and Participation	7
Regionalization and Consolidation.....	7
Funding Agency Coordinating Team	7
Water Quality Programs	8
Construction Permitting Program	8
PWS Enforcement Program.....	8
Operator Certification Program	8
Area-Wide Optimization Program (AWOP)	9
Drinking Water State Revolving Fund (DWSRF) Loan Program.....	9
PWS Sanitary Survey Program	10
PWS Quarterly Newsletter	11
Capacity Development Section Programs	11
Capacity Development Assessment.....	11
Water Loss Auditing and Control	15
Asset Management	18
Source Water Protection Program	19
Lead Testing in Schools and Childcare Facilities in Drinking Water Grant Program.....	21
PWS Sustainability.....	23
Technical Assistance Provided to Disadvantaged Communities	25
Summary and Future Plans	27
Appendix A.....	29
References	30

Table of Figures

Figures

Figure 1: Annual percentage of PWSs with no violations	4
Figure 2: First page of a recent newsletter	11
Figure 3: Capacity Development Assessment Score of all systems assessed in State FY26.....	12
Figure 4: Average change in follow-up assessment scores after assistance.....	12
Figure 5: Summary Water Balance Table showing total volumes identified	15
Figure 6: Historical volumes of real loss identified and repaired through leak detection	17
Figure 7: The five core components of an asset management plan.....	18
Figure 8: Oklahoma Source Water Collaborative Web Application.....	20
Figure 9: Category of results of all samples taken to date	22
Figure 10: Lead level differences between samples taken at the same outlet	22
Figure 11: Percentage of TMF assistance provided for PWS sustainability in State FY26	24
Figure 12: Breakdown of “Other TA” Category and number of occurrences in State FY26	24
Figure 13: Overview of all sampling statuses of systems being sampled in EC-SDC program	26
Figure 14: Total occurrence of PFOA and PFOS and the breakdown of samples with detections	26

Tables

Table 1: Newly Activated Community and Non-Transient Non-Community Systems.....	5
Table 2: Oklahoma’s Capacity Development Tools	6
Table 3: Most common missing TMF capacities	13
Table 4: Real loss statistics.....	15
Table 5: Apparent loss statistics.....	16
Table 6: Leak detection statistics	16
Table 7: Summary of the status of all facilities in the program.....	21
Table 8: Occurrence of lead categories for all samples taken to date	22
Table 9: Type and number of TMF assistance provided for PWS sustainability in State FY26.....	23
Table 10: Total Count of Violations by number of PWS Systems in CY 2025.....	29

Introduction

With the Safe Drinking Water Act (SDWA) Amendments of 1996, Congress put in place a variety of initiatives designed to assist public water supply (PWS) systems in providing safe drinking water and complying with the terms of the Act. One of these was the capacity development (CD) initiative, established with the intent of focusing on those systems most in need of assistance, primarily 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 system needs. As required in Section 1420 of the Safe Drinking Water Act Amendments of 1996, the Oklahoma Department of Environmental Quality (DEQ) must submit an annual report of CD activities to the United States Environmental Protection Agency (EPA). This report reflects the efficacy of the State's CD Strategy by detailing improvements in the TMF capabilities of the State's PWS systems. The annual CD report is available on DEQ's website, at <https://oklahoma.gov/deq/divisions/water-quality/public-water-supply/capacity-development.html>.

Program Evaluation

DEQ routinely reviews both new and existing systems for compliance through established programs, including Public Water Supply Sanitary Surveys, Compliance Monitoring, and Operator Training and Certification which are further described in this report. The summary of Oklahoma's strategy to Section 1420(a) of the SDWA are accessible at <G:\USER\SHARE\CAP-D\TEAMDOCS\Capsumry\Nwsysfin.PDF>.

Enforcement and Compliance Mechanisms

DEQ's CD program relies on the success of its enforcement and compliance programs. These two programs are partially funded through the Drinking Water State Revolving Fund (DWSRF) 10% State Program Management Set-Aside and 15% Local Assistance and Other State Programs Set-Aside. Funding information is detailed in DEQ's *Final Intended Use Plan, Drinking Water State Revolving Fund State Fiscal Year 2026*. Note that Oklahoma's state fiscal year is from July 1 to June 30.

DEQ maintains a strong enforcement program. Systems with violations of SDWA requirements or with state PWS rule violations are referred to DEQ enforcement staff for analysis of the causes behind the violations and for correction. When it is determined that enforcement is needed, there are three main legal tools available to the agency to bring about compliance: Notices of Violation, Consent Orders, and Administrative Compliance Orders. Boil Orders, while not official enforcement actions, also play a role in protecting public health.

A **Notice of Violation** (NOV) is the first formal enforcement document issued to facilities upon failure to comply with SDWA or state PWS rules or regulations. NOV's address matters such as maximum contaminant level (MCL) violations, monitoring failures, improper operating procedures, or construction deficiencies. NOV's have short deadlines for compliance, typically between fourteen (14) and thirty (30) days from the date the PWS system receives the document.

If it is determined that a system is not likely to regain compliance by a NOV's deadline, a DEQ PWS District Engineer (DE) prepares a **Consent Order** (CO). A CO is a mutual agreement between DEQ and the affected system that cites the system's responsibilities, establishes a longer deadline for returning to compliance (with milestones and deadlines for major steps towards compliance), and specifies fines that may be levied against the system because of non-compliance.

An **Administrative Compliance Order** (ACO) is issued when time is limited and there is a significant health hazard, or when a PWS system refuses to agree to the terms of a 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 include stipulated penalties for failing to meet the required deadlines.

Boil Orders, while not enforcement actions themselves, are an additional tool used by DEQ to protect public health. These orders are issued to systems that have acute health risks or *E. coli* bacteriological violations. Boil Orders require immediate notification be made to all consumers informing them of how to protect themselves.

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 (MCL). For some regulations, EPA establishes Treatment Techniques (TT) in lieu of a MCL to control unacceptable levels of contaminants. **Figure 1** shows the yearly trend in the percentage of systems in Oklahoma reporting no MCL or TT violations.

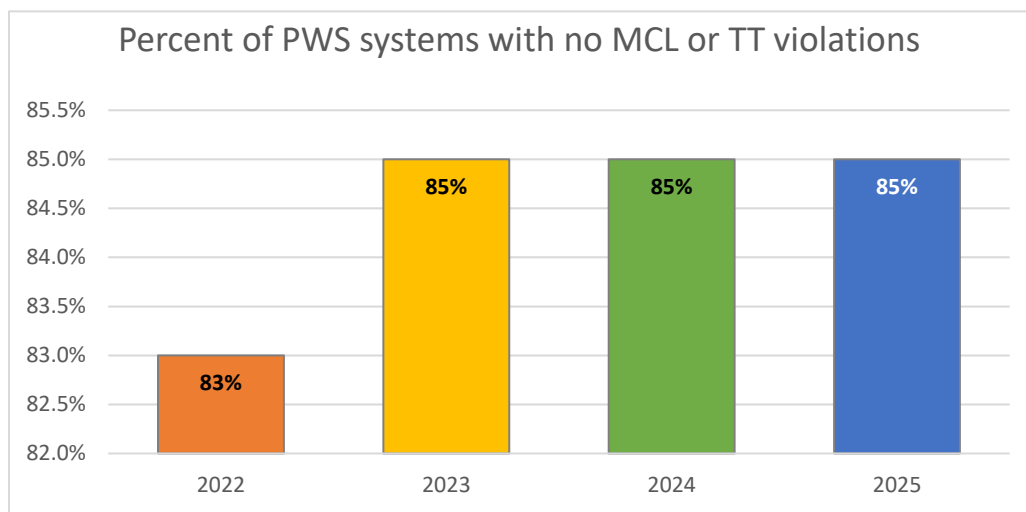


Figure 1: Annual percentage of PWSs with no violations

ETT Implementation

At the direction of EPA, DEQ implemented an Enforcement Response Policy and Enforcement Targeting Tool (ETT) aimed to identify PWS systems with health-based violations as opposed to the previous approach, where all the significant non-compliance (SNC) systems were treated equally regardless of the severity of the violation.

This approach utilizes the ETT formula as a basis for determining enforcement priority points for a PWS system. It will also be used to help identify and prioritize systems for enforcement response. In the formula, violations that pose a greater risk to public health are given greater importance. The formula calculates a score for each system based on open-ended violations and violations that have occurred over the past five years but does not include violations that have returned to compliance or are on the “path to compliance” through a specified enforcement action.

Under this policy, violation types are “weighted” with points being assigned for each violation type based on its threat to public health. Points for each “unaddressed” violation are added together to provide a total score for each PWS system. PWS systems whose scores exceed “11” are considered priority systems for enforcement unless the violations can be returned to compliance within six months.

The Capacity Development (CD) Section and the PWS Compliance Section track new community (C), and Non-Transient Non-Community (NTNC) systems that appear on the ETT list during their first three years of operation, providing them with technical assistance aimed at getting them back into compliance.

Between July 1, 2023, and June 30, 2026, a total of seven (7) C and NTNC systems became active.

Table 1 outlines the details of these systems.

Table 1: *Newly Activated Community and Non-Transient Non-Community Systems since State FY23*

PWS ID Number	PWS Name	Activation Date	PWS Type	ETT Enforcement Priority
OK2002056	TRAVERSE WIND ENERGY, LLC	7/25/2023	NTNC	NO
OK3000911	GORDON’S HOLLOW HOA	7/6/2024	C	NO
OK3004713	MCCLAIN CO RW&SD #9	5/8/2025	C	NO
OK5001436	TRUCKS AND TEACUPS DAYCARE	6/11/2025	NTNC	NO
OK5005561	OKC NORTH CANADIAN STP	7/15/2025	NTNC	NO
OK4004221	WAGON WHEEL WIND O&M	7/29/2025	NTNC	NO
OK2001249	SALT CREEK CAMP SOUTH	1/2/2026	C	NO

ETT scores for PWS systems are available at <https://echo.epa.gov/>.

Capacity Development Program

The Capacity Development (CD) Section implements the CD strategy in Oklahoma. The CD Section is responsible for fostering relationships among the various DEQ drinking water programs, between DEQ, and other state agencies and organizations that are involved with supporting and assisting PWS systems. The CD Section coordinates with the Oklahoma Water Resources Board (OWRB), Oklahoma Rural Water Association (ORWA), Communities Unlimited (CU), Southwest Environmental Finance Center (SWEFC), Oklahoma Municipal League (OML), and other agencies and organizations that provide TMF training and assistance to PWS systems. This ensures that open lines of communication exist between the entities and promotes cooperative and complementary efforts towards achieving water system sustainability. The overall goal is maintaining coordinated efforts towards increasing PWS TMF capabilities. **Table 2** lists the tools currently in use in Oklahoma to assess and enhance TMF capabilities.

Table 2: Oklahoma's Capacity Development Tools

Tool	Technical	Managerial	Financial
Construction Permitting	X		
PWS Enforcement	X	X	
Operator Certification	X	X	
Source Water Protection Plan	X	X	
Area-Wide Optimization Program	X	X	X
Drinking Water State Revolving Fund	X	X	X
CD TMF Assessments	X	X	X
Sanitary Surveys	X	X	
Asset Management Training	X	X	X
Regionalization	X	X	X
Funding Agency Coordinating Team		X	X
Rate Studies			X
Water Loss Auditing	X	X	X

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 changes in ecoregions per mile in America. Oklahoma's ecoregions, terrains, and sub-climates include everything from Rocky Mountain foothills to cypress swamps, from tallgrass prairies to hardwood forests, and pine-covered mountains. Each is graced with wide blue lakes, tumbling freshwater rivers, and peaceful country streams. Additionally, there is one man-made type of terrain: urban turf. This variety of ecoregions creates source waters with a correspondingly wide range of quality and conditions. This variability in source water quality creates a corresponding variety of treatment challenges for PWS systems.

Water Quality Efforts and Participation

Regionalization and Consolidation

DEQ continued efforts to identify new and existing PWS systems that may benefit from **regionalization and/or consolidation** into larger PWS systems in State FY26. Systems were 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 regionalization or consolidation.

Creating combined distribution systems can enhance public health by providing all systems in the combined system with water that is more thoroughly tested and often more plentiful and reliable than they were able to produce on their own. During State FY26, DEQ DWSRF was not able to fund any regionalization or consolidation projects.

Funding Agency Coordinating Team

The Funding Agency Coordinating Team (FACT), hosted by ORWA, is comprised of the following state and federal agencies and organizations:

- | | |
|---|--|
| • Oklahoma Department of Environmental Quality; | • Oklahoma Association of Regional Councils; |
| • Oklahoma Department of Commerce; | • Communities Unlimited; |
| • Oklahoma Water Resources Board; | • Environmental Protection Agency; |
| • Indian Health Service; | • Bureau of Reclamation; |
| • U.S. Department of Agriculture – Rural Development; | • Cherokee Nation; and |
| | • Chickasaw Nation. |

FACT meets quarterly to discuss the status of Oklahoma community water supplies identified in DEQ's enforcement list and to coordinate water and wastewater project funding. Before each meeting, invitations are extended to a few water and/or wastewater systems from across the state that are contending with severe problems and have the greatest *financial* need. Guests are invited for the purpose of helping them identify the best source of project funding as efficiently and effectively as possible.

With most public financing agencies present at FACT, communication barriers are reduced and application processes are streamlined, resulting in rapid assistance. FACT provides a single uniform method for requesting funding and regulatory approvals, and 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 and has been instrumental in crafting an organization that helps to correct some of Oklahoma's most difficult to solve PWS issues. The CD Section is an important member of FACT and serves by offering TMF assistance to invited systems.

The assistance provided at FACT has been universally praised by invited PWS systems, which provide feedback by voluntarily completing a brief survey immediately following the FACT meeting and a follow-up survey a few months later. Survey responses are used to fine-tune the assistance provided by FACT and help plan the direction of subsequent FACT meetings.

Water Quality Programs

Construction Permitting Program

The Construction Permitting Program assures technical adequacy by reviewing PWS system engineering reports as well as construction plans and specifications. This technical review helps determine the sufficiency of the source water and the water system infrastructure.

PWS Enforcement Program

The PWS Enforcement Program, run by the PWS Engineering and Enforcement Section (PWSES), helps assure the technical capabilities of PWS systems by providing technical assistance and training to water systems on operations, maintenance, regulations, security, and more. Managerial capabilities are also addressed by providing training to water system managers.

Operator Certification Program

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 adequate *technical* training to properly treat and monitor drinking water supplied to the public. Also, with oversight from DEQ Operator Certification Section, ORWA provides study material and training for operators for all classifications of water facilities as well as *managerial* training for system managers and board members.

During State FY26, 723 Water Operator and 128 Water Laboratory individual examinations were administered by DEQ Partners. Overall, 932 individuals passed the water operator exam while 180 individuals passed the water laboratory exam. Also, during State FY26, six (6) NOVs were issued to PWS systems for not having an appropriately licensed operator. If operator license issues arise, DEQ makes these systems aware of training and testing opportunities that are available to them at little or no charge so that the PWS system is able to quickly rectify the issue.

In addition to the training offered by ORWA, training is available in classroom settings (taught by DEQ and other certified instructors/agencies) and via the internet several times during the year. Online classes for operators and other environmental professionals are available at any place with an internet connection.

Area-Wide Optimization Program (AWOP)

The Area-Wide Optimization Program (AWOP) was first piloted in April 1999 in Oklahoma by EPA Region 6. This program started as a multi-state effort to optimize particle removal and disinfection capabilities of filtration at conventional water treatment plants. AWOP is now a voluntary approach to improve drinking water quality beyond compliance levels to enhance public health protection, and it is no longer limited to conventional water treatment plants. Following the AWOP model is one of the most cost-effective and economical ways that a PWS can improve their ability to produce safe drinking water, as it is focused on enhancing process monitoring and control using the existing staff and facilities.

In State FY26, Oklahoma DEQ participated in all quarterly meetings and on September 25, 2025, internally conducted a disinfection byproduct (DBP) workshop in Wetumka, OK. Additionally in September of 2025, three Oklahoma AWOP members assisted the Kansas AWOP Team in a voluntary Cumulative Performance Evaluation (CPE) at Ellsworth Co. RWD #1. More workshops and voluntary CPEs are planned to occur in State FY27.

To date, the Oklahoma DEQ AWOP Team has conducted 25 optimization and eight mandatory CPEs of water systems within the state. These CPEs serve to assist communities and system personnel in understanding the intricacies of water treatment. Within 60 days following the CPE, the system receives a report from DEQ that outlines the factors that may influence treatment optimizations. In addition, the AWOP team continues to provide technical assistance for the optimization of different treatment factors at various PWS systems in the form of workshops.

Oklahoma DEQ also has a recognition system within the AWOP: AWOP Awards. PWS systems can voluntarily sign up to earn points by achieving different optimization goals throughout the year. Awards are given based on a tiered ranking system where PWS systems are recognized with plaques, trophies, signs, flags, and more.

Internal participation in the AWOP team increases every year within every section of the PWS Group. With significant turnover during State FY26, newer staff have gained valuable onsite training through this program. The team aims to conduct at least one workshop on a yearly basis and conduct a full CPE at an Oklahoma water system during State FY27.

Drinking Water State Revolving Fund (DWSRF) Loan Program

The Drinking Water State Revolving Fund (DWSRF) Loan Program in the state of Oklahoma is co-managed by DEQ and OWRB and is dedicated to providing low-interest loans to upgrade PWS infrastructure. The program is designed to help those in greatest need based on a priority system that places a primary emphasis on drinking water quality compliance. DWSRF applicants are assisted throughout the planning, design, bidding, contracting, and construction phases of the project by DEQ engineers and environmental specialists. Borrowers also receive TMF capacity assistance from the CD Section. This assistance includes a capacity development assessment to determine the needs of the system and further technical assistance to develop any capacities that

are deemed necessary for receiving DWSRF funding. Applications for the DWSRF program are accepted anytime throughout the year.

Currently, 360 water systems are on the DWSRF PPL for a total of over \$2,043,929,989.00 in projects to be funded within the next few years. From 1998 to the present, the program has entered into binding commitments totaling over \$2,433,144,814.00 to fund a total of 340 PWS upgrades. In addition to funding infrastructure improvements, the program funds CD Section technical assistance, lab equipment in the State Environmental Lab, the Source Water Protection program, water loss auditing and leak detection programs, and the PWS Supervision Program.

Under the Base grant, DWSRF provided subsidies in the form of principal forgiveness to public water supplies that serve disadvantaged communities or that have health-based violations. The total amount of subsidies given was determined by the FY24 Capitalization Grant and the FY22 Capitalization Grant. For State FY26, DWSRF committed \$738,043.48 in disadvantaged subsidy to five systems under the FY22 and FY25 Capitalization Grants, and \$1,348,341.00 in health-based subsidy to three systems under the FY22, FY23, and FY24 Capitalization Grants.

DWSRF also provided subsidies in the form of principal forgiveness to public water supplies under the FY24 Infrastructure and Investment Jobs Act (IIJA) grants for disadvantaged communities. The total amount of subsidies committed for IIJA General Supplemental projects was \$13,873,188.39 to 25 water systems.

Zero funding was committed during State FY26 from the DWSRF Lead Service Line Replacement (LSL) Funding or from the Emerging Contaminants (EC) Funding.

PWS Sanitary Survey Program

The PWS Sanitary Survey Program is implemented by DEQ, in cooperation with EPA Region 6. In the course of conducting inspections, field staff from the Environmental Complaints and Local Services (ECLS) Division of DEQ and the PWSES provide technical assistance to PWS system personnel in resolving compliance issues and ensure that water systems are constructed and operating according to regulation. Across the state, ECLS staff members inspect all water systems annually. In State FY26, 586 sanitary surveys were conducted by ECLS and PWSES staff. Also, in State FY26, 809 primacy and non-primacy site inspections were completed by ECLS.

PWS Quarterly Newsletter

The PWS Quarterly Newsletter started in January 2024 in an effort to conduct more outreach to PWS systems. Four installations are sent out each year, one at the start of each quarter. Creation of the newsletter is headed by the Capacity Development (CD) Section with input from other sections within the PWS Group. The newsletter is sent to all PWS systems in the state and consists of topics that keep systems up to date on new and updated rules and regulations. It also provides links to resources that can assist systems with maintaining drinking water quality and highlights upcoming training and events conducted by various state and federal agencies within Oklahoma. Anyone can sign up for the newsletter by visiting the PWS website. **Figure 2** is a snapshot of the first page of the most recent newsletter, issued July 1, 2026.



Figure 2: First page of a recent newsletter

Capacity Development Section Programs

Capacity Development Assessment

Introduction

Since 2017, the CD Section has conducted a total of 1,427 capacity development assessments with PWSs across the state in conjunction with other technical assistance providers. Many of the assessments were completed as part of the Capacity Development Baseline Assessment Project. This project was designed to develop a clear concept of state-wide TMF needs, determine which systems were most in need of help, and delineate the unique set of needs faced by each system. The baseline assessments were conducted at all municipal PWSs and rural water districts that served 10,000 and fewer individuals between 2017 through December 2023.

During State FY24, the CD Section finalized major improvements to the assessment that made it easier to complete, understand, analyze, and synthesize. The updated assessment was implemented in January 2024. Since then, further improvements and updates have continued to be made to the assessment to best serve Oklahoma drinking water systems. Version 3.0 of the Capacity Development Assessment was implemented at the start of State FY27.

Results

The results of the capacity development assessments have allowed DEQ to identify trends and correlations regarding the status of public PWS systems' TMF capacities. The data provided significant insights such as the average assessment score of systems across the state as well as

what the greatest issues are that affect a significant proportion of Oklahoma PWS systems. A total of 1,229 original assessments were completed from the program's inception up until December of 2023, while 200 new assessments have been completed since January of 2024.

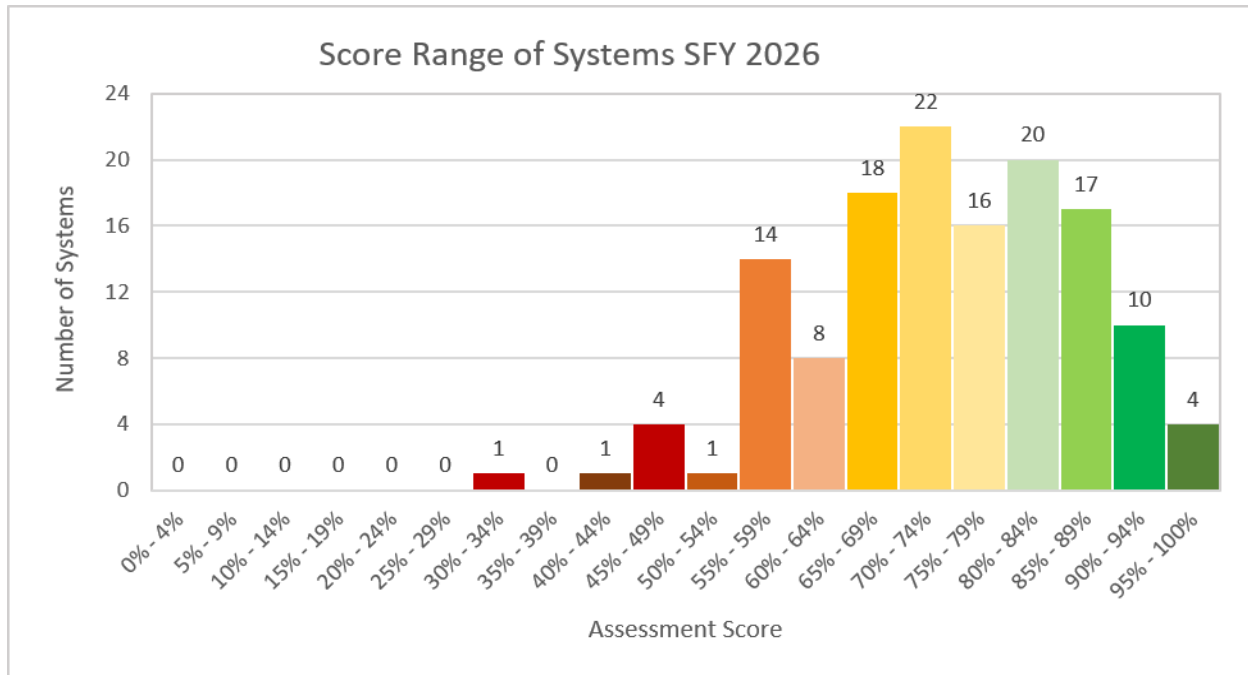


Figure 3: Capacity Development Assessment Score of all systems assessed in State FY26

During State FY26, 136 assessments were conducted. The results of these assessments indicate that, on average, PWS systems have 74.80% of the necessary TMF capacity to achieve sustainability. This means assessed systems are missing on average, 25.20% of the items, procedures, policies, and resources needed to become sustainable. **Figure 3** represents the distribution in which systems scored on their assessments during this period.

In order to evaluate the effectiveness of technical assistance (TA) provided to systems, DEQ conducts an initial assessment with a water system before providing TA and then follows up with another assessment to see how much their score improved as a result of TA. Of the 136 assessments completed in State FY26, 103 were initial assessments while 32 were follow-ups. As represented in **Figure 4**, the average score of initial assessments was 71.50% while the average for follow-ups was 85.30%. This reflects positively on the effectiveness of the CD Section's TA efforts.

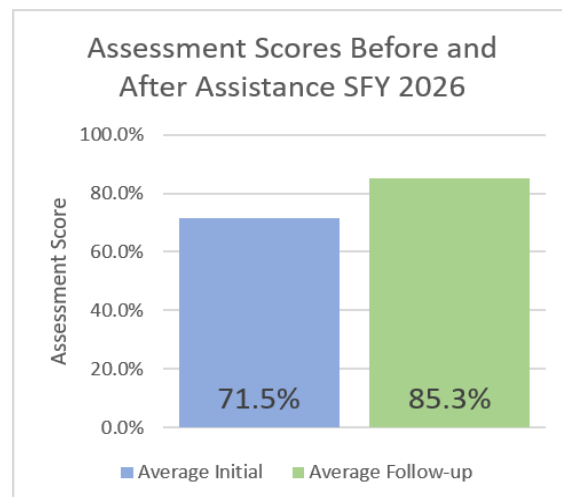


Figure 4: Average change in follow-up assessment scores after assistance

Understanding which capacities most systems lack aids the CD Section in identifying where TA efforts need to be focused. **Table 3** identifies the top five missing capacities among Oklahoma PWS systems as reported by all of the updated Capacity Development Assessments. According to the data, the most common missing capacity for PWS systems is having a written meter maintenance plan. A meter maintenance plan outlines the schedules for maintenance, calibration, and replacement of meters used to measure water production and plant metrics. Having a meter maintenance plan allows the water system to have better data integrity as well as allows those assets to have a longer lifespan. DEQ has developed a template for such a policy and shares this template with systems who lack this capacity.

Table 3: *Most common missing TMF capacities*

% Systems without	TMF Capacity Missing	Type of Capacity
80%	System has a complete written meter maintenance plan.	Technical
78%	System conducts an energy audit on a regular basis.	Technical
73%	System has a complete, written, and updated Operation and Maintenance (O&M) plan, detailing all aspects of operating the water system.	Technical
72%	System has a complete written policy regarding communication.	Technical
71%	System has a written plan to acquire additional water rights to meet future increases in demand.	Technical

It is common for systems to lack written plans, policies, and procedures. Considering this, DEQ improved and further developed its collection of templates for systems to utilize to address identified TMF deficiencies. The following templates are available for download on the DEQ Capacity Development webpage:

- Operations and Maintenance Plan
- Training and Certification Plan
- Communication Policies
- Strategic Growth Plan
- Emergency Response Plan
- Water Loss Audit Software
- Reporting and Records Policy
- Meter Maintenance Plan
- Backflow Cross-Connection Policy
- Cybersecurity Plan
- Organizational Chart
- Board Tour Memo
- Personnel Policies
- Asset Management Plan
- Meter Connections and Billing Status Policy
- Procurement Policy

Conclusions

A review of the capacity development assessments' answers yielded the following three primary conclusions:

1. Of all the Technical, Managerial, and Financial (TMF) issues surveyed, the top five limitations of Oklahoma systems are all 'technical.'

All top five limitations of Oklahoma PWS systems were found to be in the technical section of the TMF assessment. For example, one of the most common technical capacities missing was a written Operation & Maintenance (O&M) plan. While this capacity is not necessary for plant function, it is the item that most systems applying for DWSRF funding are lacking. A complete and up-to-date O&M plan is crucial for PWS system sustainability. These plans should cover all aspects of system operations to ensure continuous PWS system operation in the event of an emergency or employee turnover. In addition, O&M plans are excellent tools to train new staff and to document and preserve institutional knowledge concerning system operations. PWS governing boards are encouraged to review O&M plans at least annually to become familiar with system operational challenges and to develop a knowledge base for making accurate, strategic, and informed decisions. The importance of regular review and updates of the plan is also emphasized to ensure the effectiveness of the O&M Plan and to ensure that the system is not reliant on any specific employees in the case of an emergency.

2. Of all the deficiencies surveyed, four out of the top five included a lack of 'written policy or plan'.

According to the TMF missing capacity table, it is common for systems to lack written plans, policies, and procedures. Most systems tend to say they have a plan, yet after more investigation, it is usually discovered to not be written down. Having every plan, procedure and audit written down is highly recommended. Without these plans written down for all system staff to view, chaos and disorganization is inevitable. One of the main objectives for capacity development is to assist these systems with developing and implementing written plans, policies, and procedures.

3. Water system employee turnover has a major impact on the sustainability of a system.

There are multiple factors that contribute to a system's capacity development score decreasing over time. One of the biggest influences is high employee turnover. Many of the small systems assessed by DEQ have one operator and/or office staff who has run the system for many years, often taking on many different responsibilities within their community. As those employees retire or leave their systems, the institutional knowledge carried by that employee is lost, making written plans and policies even more difficult to create.

Water Loss Auditing and Control

Introduction

Since 2015, DEQ has worked to standardize and promote water loss auditing across the state by the use of the M36 Water Loss Audit Method developed by the American Water Works Association (AWWA). The program has had continuous success tracking and identifying sources of loss and non-revenue water across the state using this scientifically sound, repeatable, and comparable method.

Figure 5 summarizes the volumes of water use and loss identified from the 426 water loss audits completed across the state since 2015.

Summary Water Balance (in Billions of Gallons)

Volume from Own Sources: 113.15	Water Sold as Exports: 15.49	Authorized Consumption: 90.77	Billed Authorized Consumption: 86.54	Billed Metered Consumption: 86.49	Revenue Water: 86.54
	Billed Unmetered Consumption (million): 50.61				
	Water Supplied: 116.10	Unbilled Authorized Consumption: 4.24	Unbilled Metered Consumption: 2.42	Non-Revenue Water: 29.92	
			Unbilled Unmetered Consumption: 1.82		
		Water Losses: 25.69	Apparent Losses: 2.62		Unauthorized Consumption (million): 302.73
			Customer Metering Inaccuracies: 2.13		
Real Losses: 23.07			Systematic Data Handling Errors (million): 234.38		
	Water Main Leaks, etc. 23.07				
Water Purchased: 16.31					

Figure 5: Summary Water Balance Table showing total volumes identified

Real Losses

Real loss is defined as water that escapes the water distribution system through leakage, breaks, hydrants, and storage overflows. This loss is water that is treated but is never delivered to customers and results in increased operational costs and stress on source water supplies. Overall, the average amount of real water loss per system is 20%, making real loss the largest category of water loss observed from the audited systems, costing on average \$79,097 per year per audited system per year. This totals \$2.53 million in identified annual loss of systems audited in FY26. Real loss figures are summarized in **Table 4**:

Table 4: Real loss statistics

Real Loss	Average (All Audits)	Total Sum FY2026
Annual Real Loss Identified:	54.92 MG/Yr	2.01 BG/Yr
Annual Cost of Real Loss:	\$79,097/Yr	\$2,528,571/Yr

Apparent Losses

Apparent loss is water lost due to customer meter inaccuracies, billing system data errors, and/or unauthorized consumption. It is water that could have been sold and contributes to revenue loss, distorted production data, and misleading consumption statistics. The average percentage of apparent loss per audited system is 2%.

Annually, apparent losses account for a smaller percentage of total water loss than real losses; however, apparent losses still represent a significant loss of revenue to most systems participating in the audit, costing on average \$41,645 per year per audited system. Apparent loss figures are summarized in **Table 5**, shown below:

Table 5: Apparent loss statistics

Apparent Loss	Average (All Audits)	Total Sum FY2026
Annual Apparent Loss Identified:	6.24 MG/Yr	237.33 MG/Yr
Annual Cost of Apparent Loss:	\$41,645/Yr	\$1,934,884/Yr
Unauthorized Consumption:	0.72 MG/Yr	12.08 MG/Yr
Customer Metering Inaccuracies:	5.08 MG/Yr	214.18 MG/Yr
Systematic Data Handling Errors:	0.56 MG/Yr	11.81 MG/Yr

Leak Detection, Meter Analysis, and Loss Correction

Conducting water loss auditing with the AWWA M36 method has improved understanding of real and apparent losses at participating systems; however, this is only the first step towards the ultimate goals of reducing water loss and retaining system revenue.

The next step, intervention, takes the results gained from the water loss audit and uses it to guide efforts to find the specific sources of water loss and to implement solutions. This section summarizes the efforts of the technical assistance program performed by DEQ and ORWA which focused on conducting leak detection and meter analysis at PWS systems where an AWWA M36 water loss audit indicated that significant problems with real and/or apparent loss may exist. **Table 6** shows data from State FY26 and the total statistics from the nine-year history of this program.

Table 6: Leak detection statistics

Leak Detection	Total	FY2026
Number of systems who received leak detection help:	100	16
Total number of leaks detected:	513	30
Real loss identified (MG/Yr):	3,184	413.12
Value of real loss identified (\$/Yr):	\$8,734,136	\$847,687
Total number of leaks repaired during detection:	172	26
Real loss repaired (MG/Yr):	1,892	377.9
Value of real loss repaired (\$/Yr):	\$5,184,519	\$777,257

Figure 6 depicts gallons per year of leaks detected and repaired since the leak detection program began in State FY2017.

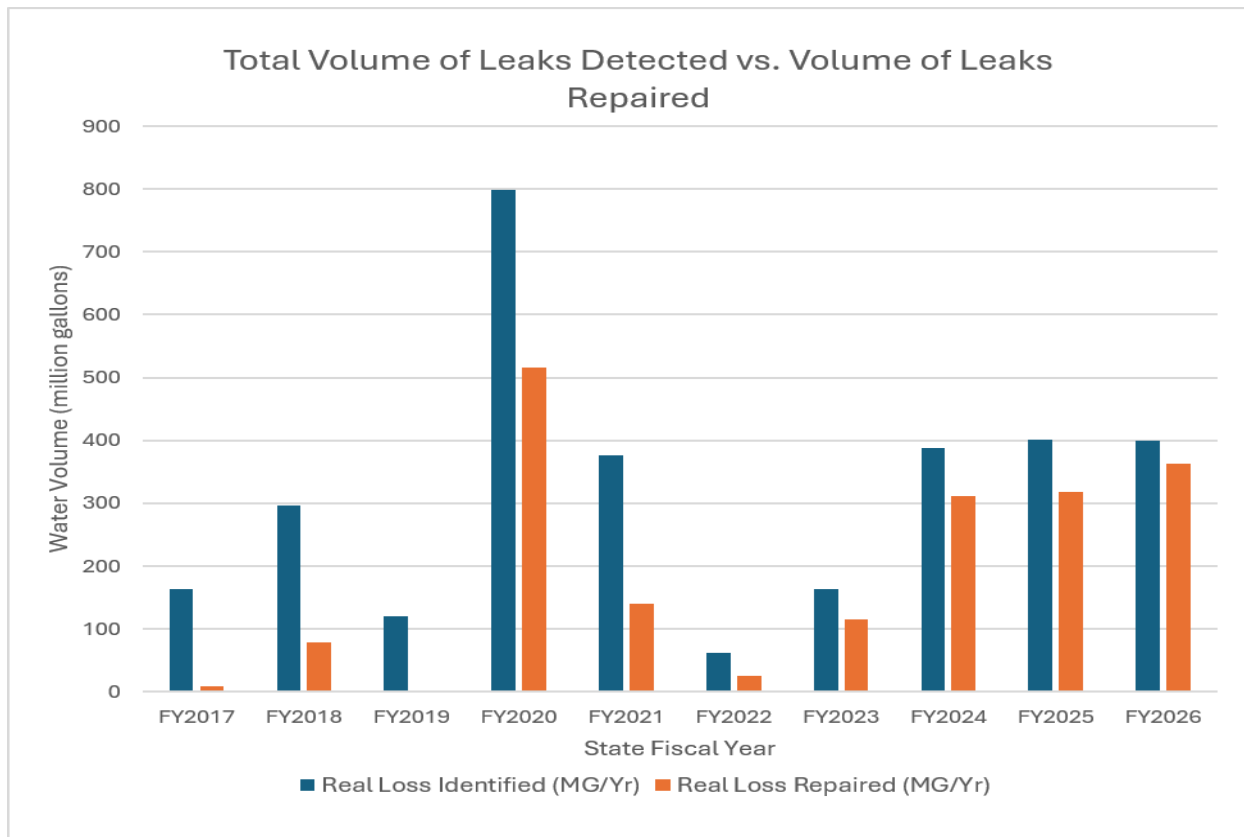


Figure 6: Historical volumes of real loss identified and repaired through leak detection

The amount of revenue saved has shown a real, immediate, and positive impact. Program participants have reported increased financial capacity, continued loss reduction, and better operational knowledge gained through their leak detection experiences with ORWA.

Going forward, DEQ will continue to build on the success of the water loss auditing and control program by performing additional water loss audits at PWS systems that request help and by continuing to contract with ORWA to conduct leak detection and meter analysis technical assistance.

Asset Management

Introduction

Asset management (AM) is the practice of operating a PWS system so that the cost of owning and operating infrastructure capital assets is minimized while delivering the service level that satisfies customers. Termed “applied common sense” by the water industry, it is a means of operating a system that maximizes efficiencies and maintains sustainability, allowing a system to provide safe water at an affordable cost - indefinitely.

An AM plan is built around 5 core components, shown in **Figure 7**:

- Building an asset inventory,
- Determining a target level of service,
- Determining criticality of assets,
- Calculating life cycle costs, and
- Developing a long-term funding plan.

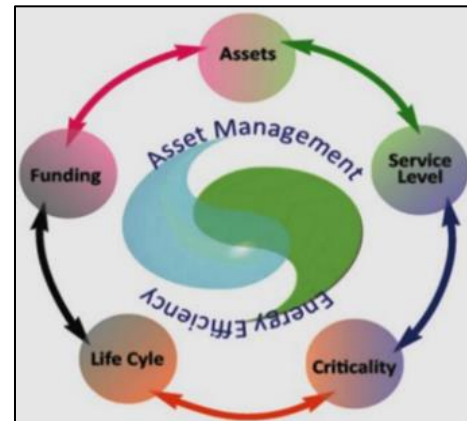


Figure 7: The five core components of an asset management plan

The Capacity Development Asset Management Tool

The CD Section developed an AM plan tool that is available to any Oklahoma PWS system, free of charge. The Microsoft Excel-based tool assists systems in cataloging their assets, determining the likelihood and consequence of failure, and exploring timeframes and funding options for asset replacement.

AM plans are a requirement for any PWS undergoing a project with DEQ’s DWSRF section. Once completed, regular updates to the plan are strongly encouraged. AM plans are vital for making informed decisions on infrastructure acquisition, construction, operation, maintenance, renewal, replacement, expansion, and disposal. Having a plan in place that is regularly updated will minimize risk, help manage costs, and ensure the continuous delivery of safe drinking water to customers. The CD Section assisted with the completion of 22 asset management plans in State FY26.

Asset Management Outreach

America’s Water Infrastructure Act of 2018 (AWIA) and amendments to Section 1420 of SDWA brought about by Section 2012 of the America’s Water Infrastructure Act (AWIA), required that states amend their capacity development strategies to include a description of how the state will encourage the development of AM plans at PWS systems. The state’s strategy focuses on providing training seminars, one-on-one assistance, and providing for third-party AM plan development via technical assistance contracts.

Source Water Protection Program

In State FY26, pilot Source Water Assessments were completed for Duncan Public Utilities Authority (PUA) as well as Southern Oklahoma Water Corporation. These assessments provided the water systems with updated assessment results, insights, and the resources to create updated source water protection plans (Duncan PUA via the new action plan template). The Capacity Development (CD) Section plans to conduct more new Source Water Assessments and create protection plans for systems around the state as a component of the technical assistance request suite provided by the section. Beyond solely relying on requests, DEQ plans to assess prioritization of water systems to better target those that could greatly benefit from participating in the program.

The delineation methodology for surface water systems was updated during this time period to instead be split into two defined zones as opposed to Zones A, B, and C. These two zones are known as the zone of critical concern (up to 5 stream miles from the intake) and the zone of peripheral concern (up to 15 stream miles from the intake). The purpose of this change was to simplify the visual interpretation of protection zones and to further emphasize the importance of the closest zone. Since all the data necessary to define these delineations was known, the source water protection areas for all 218 community public surface water systems were drawn and developed into a Geographic Information System (GIS) feature layer. This finished layer can now be found in the Water Quality Division Gallery on the DEQ website (<https://deq.maps.arcgis.com/apps/instant/filtergallery/index.html?appid=aecd50aff6584efda67b94d2f1e70e8d&sortField=modified&sortOrder=asc&view=grid>). The completion of this layer will aid in prioritization of areas for source water protection assessments, practices, and projects. In addition, this digital layer may be beneficial to outside entities who need to know the protection areas of surface drinking water sources.

The CD Section hopes to further improve methodology for the assessment of Source Water Protection Areas of the groundwater sources. DEQ does not currently have an on-staff hydrologist, which provides challenges when it comes to groundwater modeling, but avenues are being explored.

Outreach efforts were made during this fiscal year to spread the word about the redevelopment of the program. On September 10, 2025, a presentation was given to DEQ personnel about the changes made and what the program now involves. The following week, on September 17, 2025, a presentation was made at the Ground Water Protection Council (GWPC) Annual Forum in New Orleans, LA to share the program changes, the methodology for those changes, and future goals for how to better implement SWP in Oklahoma. Lastly, a 20-minute presentation on SWP was also included in the monthly Operator Renewal Trainings (ORT) to teach Oklahoma water operators about why they should care to implement SWP at their systems and what benefits participating systems in our program would obtain.

The Oklahoma Source Water Protection Program participates in the subject on a national level. The Capacity Development SWP Program Lead is an active member of the Data/GIS Subcommittee of National Source Water Collaboratives Network as well as a regular attendee at general National Source Water Collaboratives Network meetings and ASDWA-GWPC Source Water Committee meetings. Oklahoma's program has become known as an example for how to improve programs with limited resources, and Oklahoma is an active voice in the SWP community.

DEQ is also still an active member of the Oklahoma Source Water Collaborative with OWRB, OCC (Oklahoma Conservation Commission), ORWA, ODAFF (Oklahoma Department of Agriculture and Forestry), SWAWWA (Southwest Section of AWWA), USDA NRCS (United States Department of Agriculture Natural Resources Conservation Service), and the GWPC (Ground Water Protection Council). This group meets regularly to identify the source water protection needs of surface and ground water systems across the state, as well as to facilitate collaboration across the agencies involved. During State FY25, the collaborative worked on creating a comprehensive GIS map that houses a multitude of layers relating to the topic of Source Water Protection, (**Figure 8**). This tool can serve as a valuable tool for entities looking to implement source water protection measures and for water systems who have received updated Source Water Assessments. As of State FY26, this web map application is live and publicly available at the following web address: <https://experience.arcgis.com/experience/52affe3a355c440a9c9f59c18ddd5355>

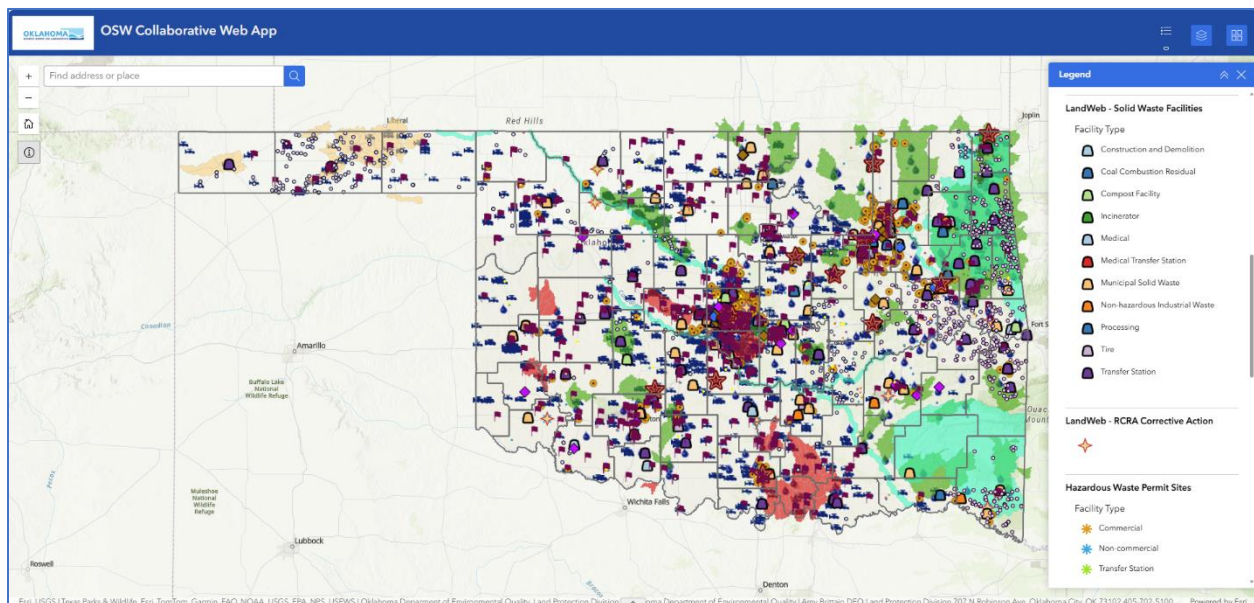


Figure 8: Oklahoma Source Water Collaborative Web Application. This map contains a multitude of data layers identifying and informing Source Water Protection efforts.

Lead Testing in Schools and Childcare Facilities in Drinking Water Grant Program

Background

Beginning in 2020, the CD Section began implementation of a program aimed at reducing or eliminating lead from drinking water in public schools and public or private childcare centers. Using funding appropriated by the EPA Water Infrastructure Improvements for the Nation Act-Section 2107, the Lead Testing in Schools and Child Care Facilities Drinking Water Grant Program (LWSC) offers free testing of drinking water for lead to any Oklahoma public school or public or private childcare facility that requests to participate. In addition to free drinking water sampling, these facilities receive direction on how to address high lead levels based on EPA's "3Ts" guidance, access to remediation funding, and follow up sampling if necessary.

Program Updates

During State FY26, DEQ continued to work with a third-party contractor to assist with the increased number of enrolled facilities and continued outreach efforts across the state of Oklahoma.

Currently, there are an estimated 4,609 eligible public schools and childcare facilities in Oklahoma. Currently, 539 facilities are involved in the program: 114 public schools and 425 childcare facilities. A total of 264 facilities completed the program. **Table 7** summarizes the program participants by status in the program.

Table 7: Summary of the status of all facilities in the program

Status of Facilities in Program	Number of Facilities
Waitlist <i>Signed up for program, waiting to be sampled</i>	206
Awaiting Results <i>Initial sampling has been conducted, but results are not yet available</i>	24
Remediation <i>Initial sampling complete, facilities are working to remediate outlets with lead detections before re-sampling</i>	42
Complete <i>Done with entire program</i>	267

Sample Analysis

Program representatives have collected a total of 10,104 samples (two per fixture sampled) from school and childcare facilities across the state. These sample results are summarized in **Table 8** and **Figure 10** and categorized into three categories: non-detect, low detection, and high detection. Facilities with high detection samples (equal to or above 10.0 µg/L) are immediately

contacted and instructed to remove the fixtures from service until a remediation plan is implemented.

Table 8: Occurrence of lead categories for all samples taken to date

Category	Samples	Percent
No detectable level of lead: <i>Less than 1.0 µg/L</i>	7,055	69.8%
Low detection: <i>Between 1.0 and 9.9 µg/L</i>	2,667	26.4%
High detection: <i>Equal to or greater than 10.0 µg/L</i>	382	3.8%

To collect accurate data and adhere with EPA's 3T's guidance program representatives take two samples at each outlet: a first draw (right from the tap) and a flush sample (taken after running the water for 30 seconds). The results of these two samples help inform remediation decisions, if needed. **Figure 9** depicts the difference in lead results from the first draw vs. "flush" (second draw) samples. Higher lead results in the first draw with lower results in the second draw, imply that the lead source could be from fixture contamination, not service lines. **Figure 9** only includes sample results with detectable levels of lead.

Overall Results by Category

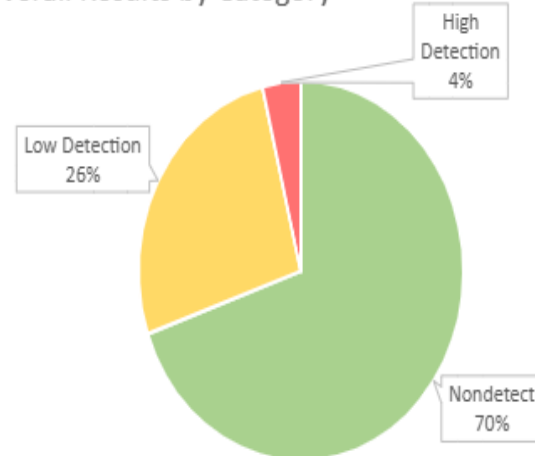


Figure 10: Category of results of all samples taken to date

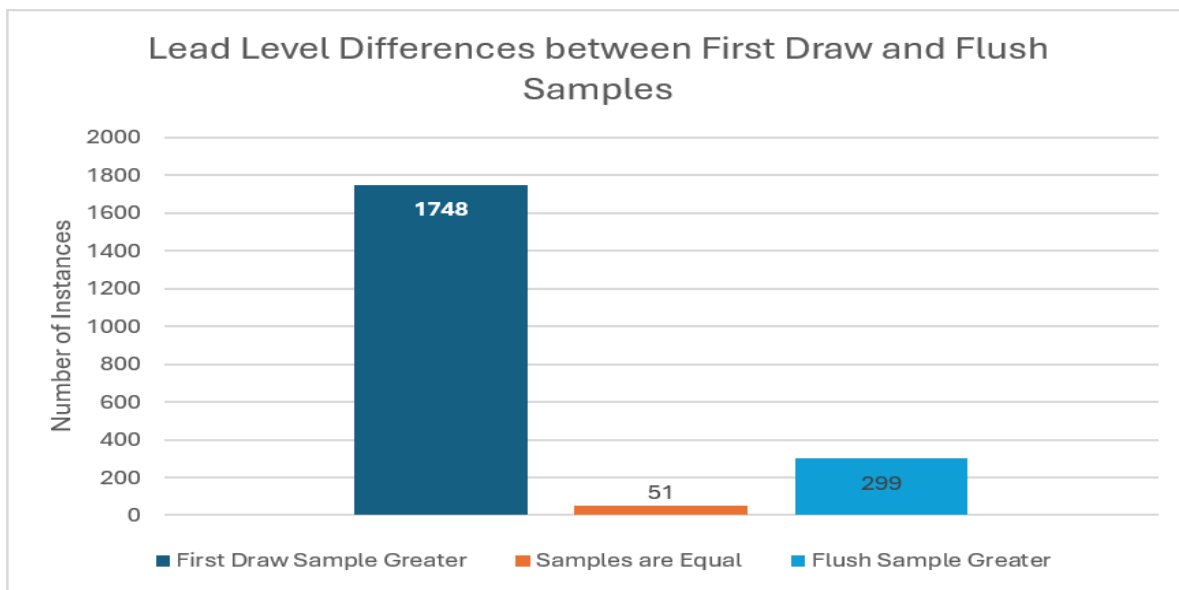


Figure 9: Lead level differences between samples taken at the same outlet

Expected Outcomes

Expected outcomes for the “Lead Testing in Public Schools & Childcare Facilities” project are:

- The reduction of children’s exposure to lead in drinking water.
- The increase in community knowledge on the harmful effects of lead in drinking water- and what can be done to mitigate exposure.
- Water quality improvement and lead exposure reduction in drinking water.
- Establishment of routine practices such as those outlined in the 3Ts guidance.
- Fostering sustainable partnerships at the state and local level to allow for a more efficient use of resources and the exchange of information among experts in various areas of school, childcare, utility, and health sectors.

PWS Sustainability

Adequate TMF capacity is a critical component of PWS sustainability and is required for a system to consistently provide safe drinking water to the public. Acquiring and maintaining this TMF capacity can be challenging for many PWS systems. A failure to maintain TMF capacity can lead to unsustainable, inefficient operation, and frequent or continuous violations of health-based, primary drinking water standards.

If a PWS system requests technical assistance, the CD Section schedules a visit with the PWS to help with various TMF policies and plans to improve the sustainability of the PWS system. To maximize assistance throughout the state, Oklahoma DEQ contracted with ORWA to provide TMF assistance with rate analyses, financial management planning, SWP planning, and much more.

In State FY26, 383 instances of technical assistance were provided to 174 unique systems across Oklahoma, each of them receiving customized assistance based on their needs. The specific assistance that was provided in State FY26 to these systems is detailed in **Table 9**.

Table 9: Type and number of TMF assistance provided for PWS sustainability in State FY26

TMF Assistance Type	# of Assistances Provided
Capacity Development Assessments (CDA)	136
Emergency Response Planning and Procedures (ERP)	15
Water Loss Auditing (WLA)	56
Asset Management Plans (AMP)	26
Rate Analysis	23
Leak Detection Assistance	14
Source Water Protection (SWP) Planning	4
Other Technical Assistance (TA) (Plans, Policies, and SOPs)	109
Total	383

To maximize effectiveness, each participating PWS received a package of technical assistance activities focused on their individual needs. There is no maximum amount of time or effort that may be expended on an individual system: as much assistance and guidance as needed will be provided to the participating system. Participation is voluntary and is driven by the level of interest of the participating system.

The PWS technical assistance program focuses on these seven priority areas for improved resiliency and sustainability of PWS systems in Oklahoma. However, any system in Oklahoma can reach out to the CD Section through their website to receive technical assistance and guidance on the creation of multiple plans and policies.

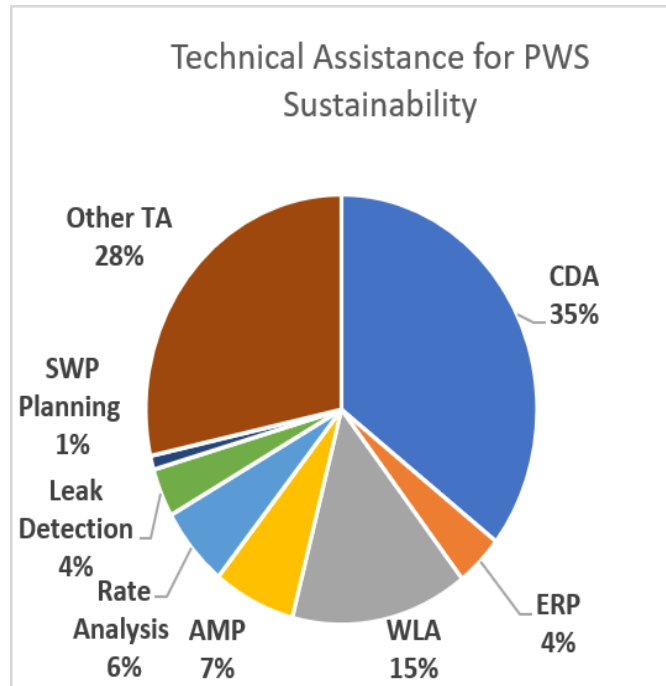


Figure 11: Percentage of TMF assistance provided for PWS sustainability in State FY26

Along with the main technical assistance outlined in **Figure 11**, the CD Section can aid with the completion of templates on various plans and policies related to maintaining an efficient and sustainable water system. **Figure 12** displays the type and number of “Other TA” completed for State FY26.

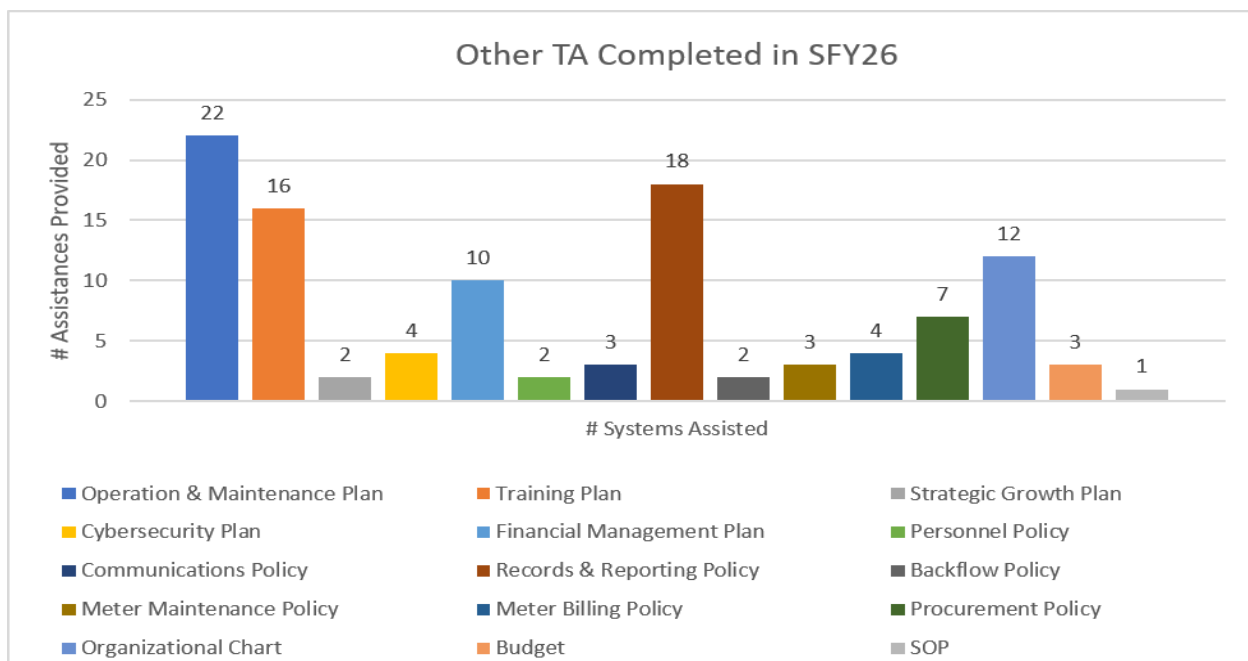


Figure 12: Breakdown of “Other TA” Category and number of occurrences in State FY26

Technical Assistance Provided to Disadvantaged Communities

Long-Range System Sustainability (LRSS) Program

Adequate TMF capacity is especially critical, but often difficult, for the success and sustainability for small (less than 10,000 in population), underserved (by having been in violation of a health-based primary drinking water standard at some point over the past five years), and disadvantaged (communities where the median household income is at 85% or less than the national median household income according to the United States Census Bureau / American Community Survey) communities. Inability to possess adequate TMF capacity can lead to health-based enforcement actions, unpreparedness during emergencies, financial issues, and more.

In State FY20, DEQ and ORWA, as members of the Oklahoma Strategic Alliance, joined forces and developed a program aimed at improving and enhancing PWS sustainability at small, underserved, and disadvantaged communities. Named the Long-Range System Sustainability (LRSS) Program, the program leads PWS systems through a series of programs and trainings, that once complete, provide a significant boost to TMF capacity and system sustainability. The LRSS program focuses on many of the issues examined by the Baseline TMF Assessment, and systems that complete the program demonstrate an improved TMF score, as well as improved efficiency, operations, and fiscal condition.

Small, Underserved, and Disadvantaged Communities Grant

With the funds appropriated under Section 1459A of the Safe Drinking Water Act, amended by the 2016 Water Infrastructure Improvement Act (WIIN) Section 2104, DEQ has been able to provide sizable grants to small, underserved, and disadvantaged communities (SUDC) for drinking water infrastructure construction projects. These projects are intended to upgrade aging or damaged infrastructure which will lead to resolution of violations of health-based primary drinking water standards and that significantly improve PWS system efficiency, operation, and fiscal health. These grant funds are provided in combination with DWSRF principal forgiveness and/or loan funding, which allows additional oversight in the planning, design, bidding, and construction phases of the projects. To qualify for the grant funds, a system must be a community water system that is on the DWSRF project priority list, has a population of <10,000 people (small), meets the affordability criteria established by the state (disadvantaged), and has not complied with a national primary drinking water regulation (underserved).

As of June 30th, 2026, the first project to receive grant funds has received their full disbursement of \$500,000: LeFlore County Rural Water District (RWD) #17. LeFlore Co. RWD #17 began work at the beginning of State FY25 and received their final disbursement from this program in May 2026. Three additional systems are lined up to begin work and receive disbursements within the next fiscal year: Breckinridge Public Works Authority (PWA) at \$300,253.57, Frederick PWA at \$452,747.50, and Okmulgee Co. RWD #4 at \$600,162.00. DEQ plans to continue using the funds as described as long as the grant funding is available.

Emerging Contaminants-Small and Disadvantaged Communities Grant

DEQ was awarded Federal FY22 and Federal FY23 funding for the EPA Emerging Contaminants in Small and Disadvantaged Communities Grant (EC-SDC) in State FY24. DEQ is using EC-SDC funding to take a proactive approach to sampling and remediation/reduction of possible exposure in and around PWS systems that are small, disadvantaged and lack the capacity to effectively identify and treat the emerging contaminants on their own. Funding under the EC-SDC in the Safe Drinking Water Act (SDWA) section 1459A will help small and disadvantaged PWS systems across the State to sample for and implement remediation and mitigation measures for per- and polyfluoroalkyl substances (PFAS) and other emerging contaminants, including manganese.

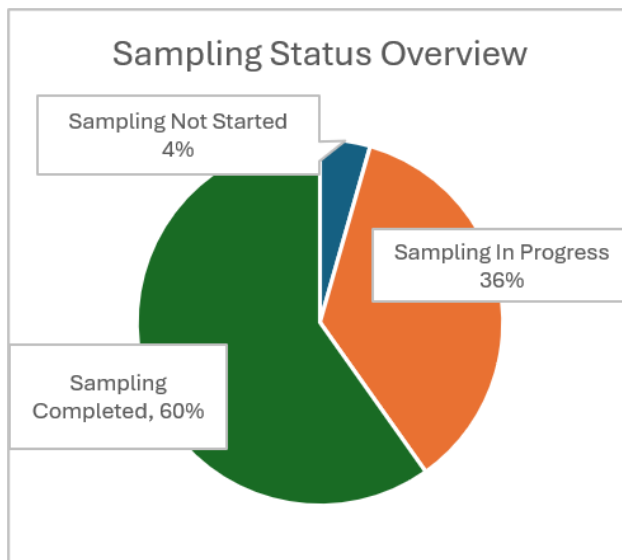


Figure 13: Overview of all sampling statuses of systems being sampled in EC-SDC program

In State FY25 and State FY26, DEQ partnered with the Oklahoma Rural Water Association and the State Environmental Lab Services to sample all eligible PWS systems for PFAS. Shown in **Figure 13**, 305 out of the 316 small and disadvantaged PWS systems have been sampled under Method 537.1 v2. All eligible systems were sent letters explaining the PFAS Rule and the grant program prior to their first sampling event. The EC-SDC Grant Program will sample each eligible system up to four times for PFAS to fulfill the initial monitoring requirements and to establish a year baseline for the emergence of PFAS. Sampling will continue in State FY27 and is expected to conclude in December 2026.

So far, there have been 34 instances of PFOA/PFOS detection (**Figure 14**), with five systems known to need remediation. It is expected that these numbers will increase as more systems are sampled in different parts of the state and at different times of the year.

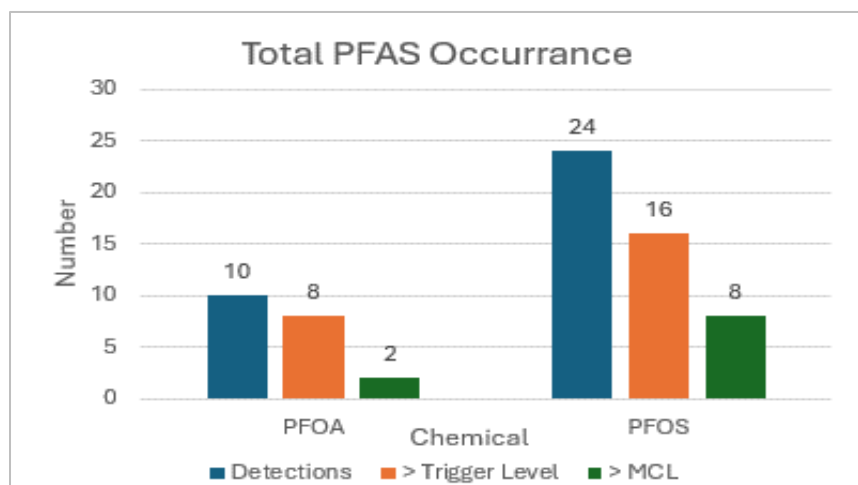


Figure 14: Total occurrence of PFOA and PFOS and the breakdown of samples with detections

The final three years of this program will be used to implement remediation projects at the systems that are highest on the prioritization list. These projects will have an emphasis on PFAS removal, but the removal of manganese and other emerging contaminants will also be eligible for remediation funding. EC-SDC funds will be partnered with Drinking Water State Revolving Fund (DWSRF) principal forgiveness funding, which will allow additional oversight in the planning, design, bidding, and construction phases of the projects. DEQ anticipates receipt of funds to be used to implement remediation measures where the PFAS and other emerging contaminants levels exceed the health advisories of the EPA. In addition, DEQ will develop outreach materials to educate the public on PFAS and other emerging contaminants and their health effects and occurrence in water before, during, and after all actions pertaining to EC-SDC.

This program will result in a reduction in the number of PWS systems serving small or disadvantaged communities that have elevated levels of PFAS or other contaminants that threaten public health.

Summary and Future Plans

Enhancing the *technical, managerial, and financial* capacities of Oklahoma's PWS systems is a group effort. The continued success of DEQ CD program is dependent on the efforts of the DWSRF Section, PWS Engineering and Enforcement Section, PWS Compliance Section, Operator Certification Section, State Environmental Lab, and the various agencies that represent the FACT and OSA. This cooperative effort is very effective at promoting Capacity Development enhancement, but it can possibly be made more effective when efforts are targeted towards those that are most in need. The CD Section participates in outreach and marketing efforts with partners throughout the year to inform Oklahoma water systems of the services the section can provide, connect with organizations with similar goals, and share success stories of its programs.

The CD Section will continue fine-tuning the technical assistance offered to respond to the changing needs of Oklahoma water systems. Expectations are to continue providing assistance to water systems through Water Loss Auditing, Emergency Response Planning, Asset Management, and AWOP programs. These programs have already had incredible impacts across the state, and the section hopes to extend assistance to as many systems as possible. Further improvements to templates, tools, visualizations, and general resources are projected and intended.

Several programs within the CD Section are also anticipated to undergo further changes as needs change across the state. These include the Capacity Development Assessment, Lead Testing in Public Schools and Childcare Facilities Program, various Disadvantaged Communities Grant Programs, and the Source Water Protection Program. The goals and predicted project outcomes below reflect the anticipated changes and future direction of the section.

Internal Goals:

1. Implement Version 3.0 of the Capacity Development Assessment with the start of State FY27 and continue to remain flexible in applying improvements to all technical assistance resources.
2. Modify the Lead Testing in Public Schools & Childcare Facilities Program to meet the needs required by the Lead & Copper Rule Improvements (LCRI).
3. Refine and implement the process for funding through the EC-SDC Grant Program.
4. Continue to fund projects through the SUDC Grant Program (now SmART).
5. Continue to promote the revamped Source Water Protection (SWP) Program, complete new assessments for as many systems as possible, and develop prioritization strategies for targeted assistance and SWP project development.
6. Promote AWOP Awards to increase awareness and application of optimization concepts.
7. Continue to promote and provide trainings and presentations on the various Capacity Development programs and aim to gain a greater audience with not only water operators, but with city leaders, managers, and office staff.
8. Coordinate more with other Public Water Supply sections to better target technical assistance to new systems and to systems who would most benefit (violations, managerial issues, etc.).

Long-Term expected outcomes of the Capacity Development programs:

1. A reduction in the number of PWS systems out of compliance with health-based standards.
2. Improved understanding of current and emerging threats to water quality, safe drinking water, public health, and environmental health.
3. A decrease of real and apparent water loss at PWS systems and increase understanding of types of loss and the importance of data integrity.
4. Improved TMF assessment scores across the state- especially in small, underserved, and disadvantaged communities- leading to an improvement in the overall state TMF score.
5. Reduced exposure to lead from drinking water at schools and childcare facilities across the state.
6. Improved awareness surrounding source waters and an increase in practices and projects that proactively improve water quality at the source.

Appendix A

Table 10: Total Count of Violations by number of PWS Systems in CY 2025

	MCLs		Treatment Technique		Significant Monitoring/Reporting	
Chemical Contaminant	Number of Violations	Number of Systems with Violations	Number of Violations	Number of Systems with Violations	Number of Violations	Number of Systems with Violations
Phase II/V						
Arsenic MCL Violations	24	7				
Arsenic Monitoring Violations					4	3
IOC MCL Violations	2	1				
IOC Monitoring Violations					15	6
Nitrate & Nitrite as (N) MCL	47	24				
Nitrate Monitoring Violations					156	116
SOC MCL Violations	2	1				
SOC Monitoring Violations					7,058	85
VOC MCL Violations	0	0				
VOC Monitoring Violations					2,122	50
Radionuclide						
MCL Violations	16	6				
Monitoring Violations					771	98
DBPR Rule						
DBP MCL & MRDL	776	151				
Treatment Technique (TOC's)			52	20		
Monitoring Violations					846	267
Total Coliform Rule (RTCR)						
Acute MCL Violations	7	7				
TCR Monitoring Violations					691	286
Lead & Copper Rule						
Treatment Technique			0	0		
Monitoring Violations					249	28
Ground Water Rule						
Treatment Technique			0	0		
Monitoring Violations					146	65
Surface Water Rules						
Treatment Technique			67	20		
Monitoring Violations					98	29
Consumer Confidence Report						
Failure to distribute or submit					154	154
Public Notification						
Failure to notify					68	18
<u>SUBTOTALS</u>	874	197	119	40	12,378	1,205
GRAND TOTAL OF VIOLATIONS = 13,371						
ACTUAL TOTAL NUMBER OF PUBLIC WATER SYSTEMS WITH MCL VIOLATIONS = 193						
ACTUAL TOTAL COUNT OF PUBLIC WATER SYSTEMS IN VIOLATION FOR MCL, TREATMENT TECHNIQUE AND MONITORING/REPORTING ACROSS ALL RULES = 710						

References

Oklahoma Capacity Development Strategy Document State FY26 DWSRF Intended Use Plan

2025 State of Oklahoma Public Water Supply Program Annual Compliance Report