

August 28, 2025

Susan Suthar, City Manager  
Town of Davis  
227 E. Main Street  
Davis, OK 73030

Re: General Permit No. OKLAA250012 - Approval  
Land Application of Residuals  
Town of Davis Water Treatment Plant  
PWSID: OK1010822  
Facility ID: W-10812  
OPDES Permit: N/A

Dear Ms. Suthar:

The Oklahoma Department of Environmental Quality (DEQ), Water Quality Division (WQD) is enclosing the authorization to operate in compliance with General Permit No. OKLAA250012, for the land application of polymer/alum residual from the Town of Davis (Town) Water Treatment Plant (WTP). The Authority's application for this authorization was submitted to DEQ on August 6, 2025.

This authorization is approved in accordance with requirements of Oklahoma Administrative Code (OAC) 252:606, as adopted and promulgated pursuant to the Environmental Code, 27 Oklahoma Statute (O.S.).

The authorization is for application of polymer/alum residuals to the following sites:

- Field #1: 28 acres located within the NW $\frac{1}{4}$ , SE $\frac{1}{4}$ , NE $\frac{1}{4}$ ; and S $\frac{1}{2}$ , NE $\frac{1}{4}$ , NE $\frac{1}{4}$  of Section 4, Township 1 South, Range 2 East of the Indian Meridian Murray County, Oklahoma.
- Field #2: 71 acres located within the NW $\frac{1}{4}$ , SE $\frac{1}{4}$ ; and W $\frac{1}{2}$ , NE $\frac{1}{4}$ , SE $\frac{1}{4}$ ; and SW $\frac{1}{4}$ , SE $\frac{1}{4}$ , NE $\frac{1}{4}$ , of Section 4, Township 1 South, Range 2 East of the Indian Meridian Murray County, Oklahoma.

DEQ will note that one-time authorization for residuals will no longer be permitted and the Town must clean and dispose of residuals in accordance with their approved RMP which requires routine cleaning of the residuals. This Authorization is being issued for one-time due to the terms of the landowner agreement. The Town must properly operate its residuals ponds in accordance with the RMP. The Town will need to apply for a new Authorization that will cover a five year period, should it wish to continue land application activities.

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The residual operation authorized by this permit should be maintained in accordance with the approved Residuals Management Plant (RMP) and the DEQ General Permit. DEQ must approve any deviation from the approved RMP or this authorization in writing before changes can be made.

I am returning a copy of the signed Authorization for your records. Please feel free to contact me at 405-702-8236 if you have any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ian Skinner', is centered below the text 'Sincerely,'.

Ian Skinner, E.I., District Engineer  
Municipal Wastewater Enforcement Section  
Water Quality Division  
Oklahoma Department of Environmental Quality

Enclosure: As stated

IS/MM/lv

SG/CG

cc: Greg Turpin, Engineer, SandyLand Environmental  
Bill Littrell, ECLS, Ada DEQ Office  
Cassandra Atwood, Regional Manager, ECLS, DEQ

**OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY  
AUTHORIZATION FOR ONE TIME LAND APPLICATION OF ALUM RESIDUALS  
UNDER GENERAL PERMIT NO. GP-OK65S  
AUTHORIZATION NO. OKLAA250012**

In compliance with Oklahoma Statute, 27A § 2-14-305 (2011) as amended, and the Rules of the Oklahoma Department of Environmental Quality (DEQ) promulgated thereunder, and in reliance on the certified statement and representation heretofore made in its application:

Town of Davis Water Treatment Plant  
301 E Main Street  
Davis, Oklahoma 73030  
Facility No. S-10838  
PWSID: OK1010822

Is hereby authorized for land application of polymer/alum residual from the Town of Davis Water Treatment Plant's west backwash pond and west settling basin to the following sites:

- Field #1: 28 acres located within the NW $\frac{1}{4}$ , SE $\frac{1}{4}$ , NE $\frac{1}{4}$ ; and S $\frac{1}{2}$ , NE $\frac{1}{4}$ , NE $\frac{1}{4}$  of Section 4, Township 1 South, Range 2 East of the Indian Meridian Murray County, Oklahoma.
- Field #2: 71 acres located within the NW $\frac{1}{4}$ , SE $\frac{1}{4}$ ; and W $\frac{1}{2}$ , NE $\frac{1}{4}$ , SE $\frac{1}{4}$ ; and SW $\frac{1}{4}$ , SE $\frac{1}{4}$ , NE $\frac{1}{4}$ , of Section 4, Township 1 South, Range 2 East of the Indian Meridian Murray County, Oklahoma.

Whose site-specific and land application site conditions conform to and are in accordance with residual characteristics, monitoring requirements, and other conditions set forth in Part I of this Authorization.

Issuance of this Authorization in no way or in any respect affects the permittee's civil or criminal responsibilities regarding beneficial reuse of residual, except with respect to the permittee's legal responsibility under the Environmental Code and Rules promulgated by the Board of Environmental Quality to obtain this permit.

This Authorization is non-transferable and is granted summarily by and at the discretion of the Executive Director in accordance with applicable DEQ Rules and provisions of the above-referenced Permit.

This is to certify that the proposed beneficial reuse of residual set forth in this Authorization meets the requirements of the DEQ Rules, provided the permittee does not exceed the loading rates and/or metal concentrations set forth in this Authorization.

This Authorization shall become effective on August 26, 2025.



Myles Mungle, P.E., Engineering Manager  
Municipal Wastewater Enforcement Section  
Water Quality Division  
Oklahoma Department of Environmental Quality

**Note: Expiration date is upon completion of existing alum residual removal as described in the application.**

**PART I: SPECIAL AND STANDARD CONDITIONS****SECTION A. SPECIAL CONDITIONS**

1. There shall be no runoff or discharge of alum residuals or water containing alum residuals from the land application site.
2. The commingling of polymer/alum residuals with any other type of residuals or wastewater for land application under this authorization is not allowed.
3. Special conditions and/or modification for specific land application sites will be included in the Authorization as necessary to protect the waters of the State.
4. When storage of alum residuals is necessary, prior to land application, the residuals must be stored in a manner to prevent pollution to the waters of the State.
5. The permittee is hereby given notice that this Authorization is in all respects subject to compliance with any and all applicable and relevant terms, conditions, provisions and requirements and any and all amendments of the laws of the State of Oklahoma and the Board of Environmental Quality's Rules. The absence of any express reference within this Authorization to any particular statutory requirement, rule(s) or standard(s) shall in no respect be deemed or construed to exempt or preclude the application of such requirement, rule(s) and standard(s) to this Authorization or the permittee. By approval, grant and issuance of this authorization, permittee acknowledges receipt of true, correct, and current copies of the Board of Environmental Quality's rules (as amended) provided, however, that permittee further acknowledges that any and all amendments thereto shall become part of this Authorization.

**SECTION B. STANDARDS CONDITIONS**

1. Duty to reapply: If the permittee wishes to continue an activity regulated by the Authorization after the expiration date of said Authorization, the permittee must reapply for and obtain a new Authorization. The application shall be submitted at least ninety (90) days before the expiration date of the Authorization. The Department may grant permission to submit an application out of time but not later than the authorization date.
2. Duty to provide information: The permittee shall furnish to the Department, within reasonable time, any information which the department may request to determine whether cause exists for modifying or revoking the Authorization, or to determine compliance with the Authorization.
3. Facilities operation: The permittee shall at all times maintain in good working order and operate as efficiently as possible all facilities and equipment used by the permittee to achieve compliance with the terms and conditions of the Authorization.
4. Right to entry: The permittee shall, at reasonable times, allow any representative of the Department, upon presentation of credentials to a responsible person:
  - a. To enter upon the permittee's premises where alum residuals are being land applied or where any records are required to be kept under the terms and conditions of the permit,

- b. have access to and copy any records required to be kept under the terms and conditions of this Authorization; to inspect any equipment utilized in the land application of alum residuals; to take photographs; and to sample the residuals being land applied or to sample the soil at the land application site; and
  - c. to enter upon the permittee's premises to examine and inspect any facilities and equipment covered under the terms of the permit.
- 5. **Monitoring and Reporting:** All monitoring and reporting shall be in accordance with Part I, Section A of the Authorization.
- 6. **Noncompliance Notification:** If, for any reason, the permittee does not comply with or is unable to comply with any term or condition of the permit, the permittee shall provide the Department with the following information, in writing, within ten (10) days of becoming aware of such condition:
  - a. Description of the noncompliance and the cause; and
  - b. the period of noncompliance, including exact dates and times; or, if not corrected the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate and prevent recurrence of the noncompliance.
- 7. **Storm water runoff:** All property utilized for land application must be maintained to prevent the discharge of storm water runoff.