



Office of the City Manager

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The following information was provided to the City of Lawton by our Consultant Engineer, Garver Engineering on April 10, 2024:

- Most common contributors of E.Coli are:
 - Cattle, which are considered the main reservoir of this pathogen.
 - Other ruminants such as sheep, goats, and deer.
 - Other mammals such as pigs, horses, rabbits, dogs, and cats.
 - Birds such as chickens and turkeys.
 - Contaminated food, such as ground beef, unpasteurized milk, and fresh produce.
 - Untreated water.
 - The environment.

- Lawton WWTP recently in March passed your routine biomonitoring test required by ODEQ/EPA. This is one of the most proven methods for demonstrating environmental compliance with the WWTP's discharge.

- Lawton WWTP actually retained effluent and did not discharge for nearly three weeks in March '24. As such, the effluent discharge volume over the last 60 days has been lower than typical. As a result, the flow in the stream could be lower. When flows are higher from the WWTP, the effluent could actually be a dilution factor for other E.coli contributors downstream (farm land, ranch land, or any land with animals, including domestic and non-domestic).

- WWTP discharge permit enforced by the ODEQ/EPA does not have an E. Coli restriction for this receiving stream during winter months. This is based on Wasteload Allocation (WLA) modeling that establishes the assimilative capacity of the receiving stream. This method for establishing discharge limits is used nationwide.

- The points of interest in E Cache Creek are over 20 stream-miles downstream of the Lawton WWTP outfall. Over this distance, there are numerous factors coming into play beyond the WWTP effluent, such as:
 - Environmental inputs/conditions such as silt runoff, pockets of stagnant water in the stream, agricultural/fertilizer runoff
 - Other potential municipal wastewater effluents

- Natural pH and DO changes outside of the Lawton WWTP control
 - See the approximate land area of the E Cache Creek watershed below. This represents over 662 sq.mi. or 423,680 ac with all manner of stormwater/agricultural loads to the receiving stream outside of the Lawton WWTP effluent.
 - Walters is also a discharger in the E Cache Creek per ODEQ maps.
- The Lawton WWTP effluent carries a color from various commercial/industrial users in the system. The ODEQ/EPA views this color as a non-regulated constituent, and therefore the WWTP is not required to remove the color.

