

Lead in Drinking Water Workgroup Meeting - Minutes

April 9, 2025 10:00 am EST

Zoom virtual meeting

Recording of meeting:

[Meeting Recording Link](#)

Meeting Recording Passcode: ^pt36i6+

Workgroup Member Attendance:

Elizabeth Dowling, KY DOW

Mary Carol Wagner, NKWD

William Davis, Carrollton Utilities

Jacob Northington, PWW

Doug Kimbler, BGMU

Emily Fritz, LWC

Brad Montgomery, American Engineers, Inc. (AEI)

Maggie Neal, RCAP

Jennifer Burt, KDE

Absent Workgroup Members:

Greg Heitzman, Blue Water Kentucky

Justin Sensabaugh, KY American Water

Sarah Gaddis, KY DOW

Other Attendees:

Eileen Miller

Kayla Chasteen

Arianna Lageman

John Conway

Michelle Beard

Shelby Guenther

Jason Lambert

Chris Bobay

Steve Dobler

Frank Hall

Steven Cole

Amber Agee

Lori Dials

Hui Chen

Jim Tackett

Sharmista Dutta

Gabe Tanner

Cortni Edwards

Ethan Givan

Taylor Rosenhagen

John Moor

Dave Messer

JD Sloan

Pete Conrad

Emily Fritz

Jennifer Whitaker

Roy Gray

Richard Harrison

Shelley Lowe

Katie Umberg/Brown

Amber Vaughn

Russell Neal

Ameerah Palacios

Christy Twyman

Trina Miller

Donna McNeil

Dan Lambert

Sara Sgantas

Todd Ritter

The meeting was moved to 100% virtual because Frankfort and many other areas of the state are still being impacted by last week's flood event.

The minutes from November 20, 2024 meeting were approved by Mary Carol Wagner, seconded by Maggie Neal.

Subgroup Open Discussion Period:**Service Line Inventories:**

- Met April 1 to review expectations for baseline inventory due 11/1/2027.
- Discussed the statistical methods and validation requirement for the baseline inventory (and subsequent inventories).
- We took a second look at the DOW ISLI template and asked for input on adjustments for the baseline inventory.
- Richard Harrison from NKWD discussed their strategy to identify remaining unknowns:
 - Enrolled in the EPA Get the Lead Out (GLO) Program; support for customer outreach and potholing.
 - Completed the initial phase of inventory modeling and still have ~20,000 unknowns.
 - Found that meter setting / riser material has been a very good indicator of service line material
 - Will be testing out a magnetic instrument used in Middlesboro, TN, to add evidence to SL material in a less invasive method. Ordered the equipment but haven't received it yet for use. If trials show it to be effective/useful, will share info with the workgroup and other systems.
 - Using LeadCAST software to narrow down and create an iterative/predictive method for identifying the remaining unknowns. Will start with a sample set in Newport to test it.
 - Have received a series of grants to replace SLs, including customer portions, starting in Newport.

Service Line Replacements and Funding:

- Scheduled to have first meeting (LCRI) April 16, 2025 at 10:00 am EST.

Communications and Public Outreach:

- Last meeting decided the current focus should be public communications and strategizing customer outreach to increase the public's participation in identifying unknowns.
- They have asked and are still asking for feedback on the [Check Your Pipes KY website](#). The DOW wants to make sure that info stays up to date and is a useable tool for systems to direct customers to.
- Please send suggestions and comments to Eileen.Miller@ky.gov

Corrosion Control Treatment:

- One concern for this committee is the impact of phosphate based corrosion inhibitor on wastewater treatment plants (nutrient loads, especially those in the optimization program)
 - Will be collaborating with downstream wastewater systems to notify when upstream drinking water treatments change.
- DOW provided an overview of the developing drinking water CCT program.
 - Shelby Guenther, DOW TA, updated that DOW is gathering treatment details from all systems in KY and updating DOW records; building a 'CCT database' to have a repository of background information available in the case of a water system needing to add or adjust CCT in the future.

- 4 coordinators spread across 5 different regions in KY
 - James Napier: Hazard RO
 - Shelby Guenther: Morehead RO
 - Zoe Scott: Columbia RO
 - Destiny Hall-Combs: Frankfort RO
- They want to complete the initial data gathering by July 2026
 - 30 systems completed and 14 in progress currently
- The CCT checklist for this program will be shared with the workgroup.
- Subgroup is putting together a list of resources they want to make available to systems:
 - Guidance docs
 - Action flowcharts
 - Lessons learned (!! They would really like some operator/system knowledge here)
 - FAQs
- Chris Bobay, Louisville Water Co, provided some suggestions to make the DOW CCT program more effective:
 - He suggested looking at 90th percentile, other past lead tap records,
 - Daily max. records from the MOR (e.g., pH, alkalinity) may not be the most effective measure, because they don't show what is happening throughout the day
 - He also brought up the issue of sample size and sample pool changes in regards to Pb and Cu testing (impacts of larger sample sizes, changes to the sample pool because of customers refusing access, dropping out, or having their SL replaced, etc.). Try taking that into consideration when developing program.

Tap Sampling, School and Childcare Program:

- Met April 8, 2025
- Tap sampling and school/childcare sampling subgroups have been combined
- Goals of are to develop list of communication needs, guidelines, and identify templates needed
- Created a list of materials already developed (e.g., by EPA and others), so we can build on existing tools rather than recreate them.
- Priority action items:
 - Site sampling plan template. DOW has one nearly ready to go; will be available in next quarter.
 - One-page and KY-specific guidance docs
 - Flow charts/timelines
- Subgroup had good attendance from a wide variety of stakeholders representing education, public health, small systems, etc.

Open Discussion / Other Action Items to Address:

- DOW working with partners on updating SL Inventory template for baseline inventories; will incorporate Replacement Plan tools as well
- DOW collaborating with EPA to address the issue of all the galvanized SLs that must be classified as 'GRR' even though water system has no evidence of lead upstream.
- Pete Conrad, KRWA: Questions about LCRI SL Inventory Validation requirement
 - Asked if we could get some guidance to systems who are 100% field verified so they can avoid the validation procedure
 - Elizabeth shared the [EPA LCRI fact sheet for validations](#).

- DOW clarified that water systems must go through the SLI Validation steps if they have Non-lead service lines that were 1) identified as Non-lead through records review alone, and 2) installed prior to 1988.
- DOW will create “certification” documents for those systems that can 1) certify they are not required to complete the SLI Validation, or 2) certify they’ve completed the SLI Validation requirements. There will likely be a place on the SL Inventory template to record sites that have been used for validation.
- Suggestion from Maggie Neal, RCAP:
 - Create a one-page document with timeline of all the primary LCRI requirements

SRF Project Updates:

- Waiting on information from CIFA for lead cap grant allocation for the last two years of the BIL. The allocation Kentucky receives will be based on the service line inventory data and is projected to be available no sooner than May 1.
- KIA will release a draft IUP in May, which will be updated based on the lead allocation.
- Discussion about how the number of ‘unknown’ service lines will impact the determination (there are about 400,000 unknowns out of Kentucky’s 1.9 million total service lines).

EPA Updates:

- Kentucky was in the top 2 in the region (EPA Region 4) for compliance with SL Inventories, and is in the top 10 of the nation.
- 96% of water systems submitted the initial SL Inventory on time, and all were received by December, 2024.
- 15 violations were issued for late submissions, and 9 violations were issued for incomplete/insufficient inventories. All 15 late submissions have returned to compliance, and 5 of the 9 incomplete inventories have now returned to compliance.
- The EPA GLO Program has enrolled 4 water systems in the northeastern corner of the state, and is looking at enrolling up to 6 more systems in the SE end of the state.

General Comments/Discussion:

Division of Water has created a Teams page for members of the subgroups and committee members. This is intended to be a place to collaborate on documents, share materials and examples.

Contact Elizabeth.Dowling@ky.gov to be added to the Division of Water email list for “Drinking Water Wednesday”. This is a weekly newsletter with updates, guidance, tips, and more from Division of Water on different drinking water topics.

Next meeting: **July 9, 2025 at 10:00 am EST**. It will be a hybrid meeting (in-person at 300 Sower in Frankfort and virtual via Zoom).