

Triennial Report to the Governor

**Capacity Development Program
For Kentucky Drinking Water Systems**

COMMONWEALTH OF KENTUCKY

October 1, 2002 – September 30, 2005

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EXECUTIVE SUMMARY CAPACITY DEVELOPMENT PROGRAM FOR KENTUCKY DRINKING WATER SYSTEMS

Introduction

Section 1420 of the Safe Drinking Water Act (SDWA) requires primacy states to develop a strategy for assisting public water systems (PWSs) to develop the technical, financial and managerial ability of the system to comply with the regulatory requirements of the SDWA. Subsection (c)(3) requires that a triennial report be sent to the Governor and made available to the public describing the efficacy of the strategy and progress made.

Section 1420(c) of the SDWA has mandated that the triennial report address: (1) efficacy of the Capacity Development strategy and (2) progress made toward improving technical, managerial and financial capacity of public water systems. The United States Environmental Protection Agency (USEPA) published a document on May 12, 2005 to assist states in the preparation of the second triennial report, titled "Suggested Reporting Content for the Development of State Capacity Development Program Reports to the Governor". This report includes the two SDWA mandated topics and follows the report suggestions outlined by USEPA.

Highlights of the Strategy's Effectiveness

In the first Capacity Development report to the Governor in 2002, there were 595 PWSs serving more than 3.6 million Kentuckians. Only 20 of those systems were identified as persistent violators. As of September 30, 2005, Kentucky has continued to reduce both the number of PWSs and the number of persistent violators. The Commonwealth currently has 521 PWSs serving approximately 3.7 million customers. Of these systems, only 11 have been identified by USEPA as persistently violating drinking water laws and regulations. Kentucky ranks second nationally in percent of statewide population served by public water systems, at more than 90 percent.

Drinking Water Budget Sanctions and Agreed Orders have been especially effective in monitoring and assisting PWSs that may not have the technical, managerial and financial capacity to provide drinking water to their customers that meets SDWA requirements.

The Cabinet continues to provide training and issue certifications to ensure that individuals who operate drinking water systems are qualified and capable of performing their duties. Many stakeholders also provide training to meet the growing need for the drinking water profession and public health.

Kentucky's source water assessment and protection efforts continue to demonstrate successfully their statewide and system wellhead protection programs and source water protection strategies. Numerous examples of success are presented in this report.



Triennial Report to the Governor

Capacity Development Program For Kentucky Drinking Water Systems

OVERVIEW OF KENTUCKY'S CAPACITY DEVELOPMENT STRATEGY

The Safe Drinking Water Act (SDWA) amendments of 1996 included provisions for the establishment of a Drinking Water State Revolving Fund (DWSRF) to finance construction and improvement to new and existing Public Water Supplies (PWS). To receive the full allocation of DWSRF funds, the SDWA requires that states develop and implement a Capacity Development program to ensure that all PWSs have the technical, managerial and financial capacity to meet state and federal regulatory requirements.

In September 2000, the Commonwealth submitted its Capacity Development strategy to the United States Environmental Protection Agency (USEPA). To fulfill SDWA requirements, the plan included two elements: a description of Kentucky's legal authority to require new PWSs to show technical, managerial and financial ability to meet regulatory requirements and a strategy to assist existing PWSs to develop or improve adequate technical, managerial and financial capacity. This ambitious plan laid out five major objectives for the Commonwealth to meet, and through the last five years of implementation, substantial progress has been made in accomplishing those objectives. These objectives were created to fulfill requirements of Section 1420 of the Safe Drinking Water Act and KRS 151.632.

The first objective in Kentucky's Capacity Development strategy is to determine methods the Division of Water will use to identify and prioritize existing PWSs in need of improving technical, managerial and financial (TMF) capacity. To meet this objective, the Division created a group of criteria for ranking systems on a TMF capacity need basis. An initial ranking system was drafted, but currently is not being utilized. The Division of Water is reviewing the criteria to ensure effectiveness. Workshops and stakeholder meetings will be scheduled in late 2005 to obtain additional insight for a formal evaluation system. Currently DOW is evaluating public water systems based on technical triggers such as water availability, compliance history and treatment process performance.

A PWS is also allowed under this section of the strategy to approach the Division of Water to request technical assistance and enter into voluntary Agreed Orders that address capacity development within the PWS. Since the initiation of these voluntary Agreed Orders, 12 PWSs have entered or agreed to enter into an enforceable strategy that allows limited growth while capacity is improved within the system.



Accomplishments in Kentucky's Capacity Development Program have been realized with success stories from Martin County, Elkhorn City and Campton. A number of strategies have contributed to the overall accomplishments of the Capacity Development Program during this three-year reporting period. The DWSRF, new and inactivated systems, system consolidation and restructuring, training efforts and source water protection are discussed in the "Progress" section of the report.

The strategy must describe the institutional, regulatory, financial, tax or legal factors at the federal, state or local level that encourage or impair capacity development. The Division of Water recognizes a number of factors that impair the process of effectively developing capacity in PWSs. From a federal level, increasing regulatory requirements on PWSs have made compliance challenging in terms of both monitoring costs and technical resources. This is especially true for small PWSs that already have limited TMF capacity. The Division of Water has responded to this challenge by offering PWSs comprehensive compliance assistance and technical assistance without the risk of a resulting enforcement action. Inconsistent federal interpretation of drinking water regulations is also a challenge that the Division of Water has been working to address through close communication with the USEPA regional office and headquarters. Many state agencies are working together along with Kentucky Rural Water Association and other non-state agencies such as Rural Development. On a local level, trying to ensure that PWSs have adequate capacity often presents difficult decisions, which may involve increased rates. Even though rates may not have been raised in years or even decades, the political risks associated with raising rates deter mayors, city councils, water system boards or other PWS decision makers from moving forward with rate hikes.

Kentucky has had limited success with municipalities due to the inability to assert regulatory authority. The only real success has been with the threat of issuing a boil water advisory when public health is in jeopardy. One example of Kentucky's Capacity Development Program's struggle with municipalities was the city of Elkhorn City. The city was notified in 2003 that a number of problems with treatment processes at the water plant existed. These problems were reportedly remedied, but in 2005 they resurfaced in what culminated in a system-wide boil water advisory emergency. The city lacked the managerial capacity to respond to this emergency without extensive guidance by DOW. Further, the city appeared to lack the financial capacity to respond to the emergency. In fact, the city was having problems breaking even with the water system and had no funds in place to make regular system repairs or emergency repairs. The situation was worsened with the sudden death of the only certified operator of the system, which left the city without even the technical ability to operate. Had it not been for an available connection to another water district in the area, the city would have faced an extended boil water situation. No process or authority to perform financial and managerial reviews on municipal water systems currently exists through any Kentucky regulatory agency. As the Capacity Development Program matures, DOW hopes to have the regulatory authority in place to prevent situations such as this one.

The strategy must describe how the Cabinet will use the authority and resources of the SDWA to assist PWSs in complying with drinking water regulations, encourage



partnership developments between PWSs to increase capacity and assist PWSs in training and certification of operators.

The Division of Water received USEPA approval for the Kentucky Operator Certification Program on September 19, 2005. Under USEPA, state certification programs must conform with “Final Guidelines for the Certification and Recertification of the Operators of Community and Nontransient Noncommunity Public Water Systems.”

The strategy must describe how the Cabinet will establish a baseline and measure improvements in capacity to comply with drinking water laws and regulations. To accomplish this, the Division of Water determined a number of criteria that measure improvements in capacity development by PWSs in the state. These include the increase in statewide system availability to Kentuckians, the reduction of persistent violators, the number of PWSs combining resources to achieve economies of scale through regionalization and mergers, loan and grant tracking through the DWSRF, the number of technical assistance visits requested and performed, and the identification of qualifying PWSs and entry into enforceable agreements to address capacity development. Baseline and improvement measures are described below in the “Progress” section of this report.

The strategy must identify partners with an interest in developing and implementing the Capacity Development strategy from federal, state and local levels. A list of ongoing stakeholders is provided and discussed in the “Progress” section of this report.

PROGRESS IN IMPLEMENTATION OF THE CAPACITY DEVELOPMENT PROGRAM

In 1999, the Commonwealth had 698 PWSs serving approximately 3.3 million citizens. Of the 698 systems, 41 were identified by USEPA as persistent violators of drinking water laws and regulations. In the first Capacity Development report to the Governor in 2002, there were 595 PWSs serving more than 3.6 million Kentuckians. Only 20 of those PWSs were identified as persistent violators. As of September 30, 2005, the date of this report, Kentucky has continued to reduce both the number of PWSs and the number of persistent violators. The Commonwealth currently has 521 PWSs. These PWSs are serving approximately 3.7 million customers, and Kentucky ranks second nationally in percent of statewide population served by public water systems, at more than 90 percent. Of these PWSs, only 11 have been identified by USEPA as persistently violating drinking water laws and regulations. The large reduction in PWSs over the last number of years has been due primarily to the state’s encouragement for PWSs to combine resources and capacity by regionalizing and expanding service areas. Through technical assistance, and occasionally enforcement processes, persistent non-compliers have either developed their technical, managerial and financial capacities and now meet state and federal laws or have merged with other PWSs that had the capacity to better serve customers and meet drinking water laws.



In 1990 Kentucky began a program for the purpose of developing long-range water supply plans for each county that included all municipalities and public water systems. The plans include an assessment of the existing public and private water resources, an examination of present water use and projections of future needs and a determination of viable alternative strategies, including regionalization that can be implemented in order to meet future water supply needs. This process has also led to the development of numerous plans to extend drinking water service to unserved areas and underserved areas.

A strong focus has been placed on Geographic Information Systems (GIS) in recent years. These systems are able to geographically map and position numerous physical infrastructures used for source, distribution and treatment of domestic water supplies. They also aid planners in identifying underserved areas and devising the most practical ways of extending services to these areas. GIS has enabled planners to not only consider obvious geographical obstacles and water distribution routes, but also alternative sources and means of delivery. More importantly, GIS can support a more efficient and robust long-range infrastructure planning process, with fewer total resources going to planning and more to the efficient development of infrastructure.

The strength of GIS is also being used to develop more effective tools to manage water resources in ways that will ensure adequate quality and quantity of drinking water sources. Efforts to delineate and study critical source water protection areas have been substantially improved with the application of spatial analysis and mapping. Source water protection areas for both surface water and groundwater have been prepared for every public water supplier in Kentucky. Using the GIS platform, tools are also being developed that will allow watershed-scale assessments of hydrologic capacity of individual water sources and drought vulnerability of the public water systems they supply.

Kentucky continues to utilize set-aside funds from the DWSRF for Technical Assistance for Capacity Development (in accordance with 1452[k][2][c]), as follows:

- 2001 - \$112,886 for DOW personnel and \$124,500 for contracts (development of SDWIS database)
- 2002 - \$196,102 for DOW personnel
- 2003 - No funds were setaside
- 2004 - \$254,959 for DOW personnel (including travel) and \$200,000 for contracts (USGS water budget analysis work and continued development of SDWIS database)

The Division of Water has committed a dedicated staff of trained environmental technologists to provide Technical Assistance and Outreach (TAO) to PWSs that request guidance in improving technical capacity. From 2002 – 2004, TAO received requests for technical assistance and responded with site visits to nearly 1,000 PWSs. On-site technical assistance is offered to PWSs without threat of enforcement action, giving



PWSs an opportunity to be proactive in optimizing technical capacity. The TAO program is funded in part by the Small System Technical Assistance DWSRF set-aside grant.

The following is a summary of Technical Assistance accomplishments over the three-year reporting period:

- Approximately 120 surface water sanitary surveys were performed covering technical, managerial and financial aspects.
- Twenty-four water systems have participated in year-long Performance-Based Training that focused on optimizing water treatment plant microbial/turbidity removal through special studies, data management tools, reports and group activities.
- Priority rankings and scorings were done in January 2004 and 2005. All Kentucky surface water systems were ranked according to their ability to meet optimized turbidity goals. The ranking provides the basis for that year's activities. The scores have steadily decreased (the lower the score the more often the water plant met the optimized goals) since 1997. With the 2005 Rankings, 34% of all surface water systems in Kentucky met the optimized filtered water goal of 0.1 NTU.
- Six non-regulatory Comprehensive Performance Evaluations (CPE) were done in this timeframe. CPEs focus on the operations, maintenance, design and management of a water system regarding factors that limit optimized treatment.
- More than 1,100 technical assistance visits were made between 2002-2005, covering all aspects of water treatment and distribution. The primary focus since 2002 has been disinfection by-products (DBP) control.
- A Drinking Water Branch Web page that receives more than 300 "hits" per week has been maintained; the Web page covers all topics related to drinking water and includes useful tips, reports, correspondence, engineering requirements, compliance information and links to other pertinent state and federal programs.

Technical Assistance works on-site with systems and during the three-year reporting period has had much success with DBPs. The following is a summary of DBPs and reasons for success:

- Twenty-five water systems have requested total organic carbon (TOC) Step 2 jar testing due to difficulty in meeting the TOC removal criteria. This results in new "system-specific" TOC percent removals that has



enabled these systems to come back into compliance with TOC requirements.

- Reviewed and/or approved 32 changes in disinfection practices. DBPs can be significantly reduced, especially haloacetic acids, by relocating the point of pre-chlorination from the rapid mix to the top of the filters. This can be done following DWB approval and involves a list of stipulations that must be followed when not pre-chlorinating.
- Worked with improving coagulation and filtration practices to increase the removal of TOC and thus lower the DBP formation.
- Re-evaluated DBP sample sites for some systems to determine if they are representative of Stage 2 requirements.
- Worked within distribution systems to improve tank turnover, flushing and residual disinfectant maintenance as a means of reducing DBP formation.
- Reduced DBP violations for systems serving populations greater than 10,000 customers from 25 percent (June 2004) to 5.8 percent (June 2005). Future emphasis will focus on systems serving populations less than 10,000 customers due to their difficulty in meeting DBP requirements.

Another tool that the Division of Water has found very successful is the Drinking Water Budget Agreed Orders. Drinking Water Budget Agreed Orders are designed to allow PWSs nearing system design capacity to continue limited growth (up to 100%) through careful planning and management of available water. PWSs are given a budgeted amount of water based on annual production levels. For example, a 1 million gallon per day (MGD) PWS currently producing at 90 percent of design capacity would receive a budget of 0.1 MGD. PWSs then prioritize projects, and demand for each priority project is subtracted from the initial water budget. Through the Drinking Water Budget Agreed Orders, the Division of Water can avoid issuing system-wide line extension bans or tap-on bans to systems that have plans or are willing to make plans to expand system design capacity. Agreements typically include the two-to-five-year planned solution to increase system design capacity. At present, the Division of Water and Division of Enforcement have received proposed water budgets from 9 PWSs and are expecting 7 PWSs to enter into Agreed Orders by the end of 2005. It is anticipated that even more PWSs will be approached about these Agreed Orders in 2006.

Drinking Water Budgets are a large part of the Commonwealth's Drinking Water Sanction program. As stated above, Budget Agreed Orders give systems the ability to grow to their full design capacity. Oftentimes, a sanction or Water Budget not only affects the producing system, but also systems that purchase water from that producing PWS. For instance, the city of Jamestown was nearing design capacity. Jamestown produced water for its own customers as well as for customers of the Russell Springs



Water System and the Adair County Water District. A full sanction would not only have disallowed growth by Jamestown, but also by the purchasing systems. Instead, the limited-growth sanction presented to Jamestown, Adair County, and Russell Springs allowed all three systems to continue to make residential tap-ons and limited water line extensions. The table below summarizes systems currently on or soon to be on Water Budget sanctions:

Producing PWS on Water Budget	Purchasing PWS on Water Budget
Jamestown Municipal Water Works	
	Adair County Water District
	Russell Springs Water Works
Mount Vernon Water Works	
	Brodhead Water Works
	Eastern Rockcastle Water Assn.
	Western Rockcastle Water Assn.
Manchester Water Works	
	North Manchester Water Assn.
Wood Creek Water District	
	Livingston Water Works
	East Laurel Water District
	West Laurel Water District
Martin County Water District	

Unfortunately, a few drinking water systems statewide are producing water at or above 100 percent of their design capacity. In these cases, a full sanction must be imposed on the PWS. Summarized below are all full sanctions currently imposed in Kentucky:

Producing PWS on Full Sanction	Purchasing System affected by Full Sanction of Producer
Campton Water Works	
Burkesville Water Works	
	Cumberland County Water District *

* The Division of Water has allowed Cumberland County to enter into a Water Budget Agreed Order since it does not rely solely on Burkesville for its supply. The system produces water and purchases water from another source.

Another key to successful implementation of Kentucky’s Capacity Development strategy is the partnerships that have formed between the Division of Water and other parties interested in Capacity Development in Kentucky’s PWSs. Below is a list of active partners who have contributed to the success of Kentucky’s Capacity Development Program.



- Active partners with the Commonwealth of Kentucky are:
 - Kentucky's Public Water Systems
 - PWS consumers and potential consumers
 - Kentucky Department for Environmental Protection
 - Kentucky League of Cities
 - Kentucky Rural Water Association
 - Kentucky Cabinet for Health Services
 - Kentucky Infrastructure Authority
 - Governor's Office of Local Government
 - Kentucky Geological Survey
 - Rural Community Assistance Program
 - Kentucky Water and Wastewater Operators Association
 - American Water Works Association
 - Consultants
 - Kentucky Division of Plumbing
 - Kentucky Public Service Commission
 - Western Kentucky University (management)
 - University of Louisville (financial)
 - U.S. Environmental Protection Agency
 - U.S. Department of Agriculture, Rural Development
 - Area Development Districts
 - City governments
 - County governments

One of the recent challenges Kentucky has faced in ensuring all PWSs have the capacity to meet drinking water laws and regulations is dealing with "Orphan" Drinking Water Systems. These small water systems are by regulatory definition PWSs based on the population that they serve. However, the systems have no responsible managing body or legal status. For example, a small town in Western Kentucky draws water from a well that has been deeded to the unincorporated community. Users of the well gather money for payment of the electrical bill that runs the well pump and effectively provides water to the users. However, limited and sporadic testing has been performed to determine quality of the water. The system was referred to the Division of Enforcement for formal enforcement action, but because no responsible entity or individual existed, no enforcement action could be taken. At this time, three Orphan Water Systems have been identified in the Commonwealth. All lack the capacity to operate effectively. In response, the Cabinet has formed a task force to determine and implement a strategy for eliminating these drinking water systems. Members from the Division of Water, Division of Enforcement and other stakeholders make up the task force and are meeting regularly to determine the best solution for these highly individual situations. Members of the task force also research and locate PWSs with the capacity to absorb the users of Orphan Water Systems and initiate conversations about extending lines into those areas. Through the efforts of the task force, two orphaned systems have been identified and will be eliminated by the end of 2005.



Kentucky's drinking water program is not without upcoming challenges. Reduction in allocation of state and federal funds will place a strain on the DOW resources. Upcoming regulations (e.g. CCR, PN, Lead/Copper) need to be formalized and incorporated into the drinking water program. DOW also plans to focus more heavily on public education and communication in the upcoming year.

KENTUCKY'S DWSRF AND OTHER CAPACITY DEVELOPMENT TOPICS

The primary mission of the drinking water program is protection of public health. Looking at existing and future rules, the evaluation of new and existing public water systems is essential to execution of Kentucky's capacity development strategy. The Division of Water is evaluating revisions to its staffing requirements, which includes a future expansion plan for the capacity development program.

The expansion would allow Kentucky to continue to re-evaluate and implement the Capacity Development Strategy as it relates to public water systems in order to meet the requirements of the Safe Drinking Water Act and USEPA. This federally-funded expansion would allow DOW to consistently evaluate the technical and managerial components required under the SDWA for new or existing systems. Highlights of the proposal are provided below:

- Staff would evaluate any new and each existing water system's technical ability to comply with the SDWA by review of inspections, sanitary surveys, complaints, compliance data, engineering reviews, enforcement history, water availability, PSC reports, operator staffing/certification and any other information available. This section would also coordinate sanctions review, the prioritization and evaluation of Drinking Water State Revolving loan projects and environmental reviews.
- Once a system is deemed to lack capacity, staff would use resources to take the role of coordinating assistance to these types of facilities as a followup to program identification. A "master plan" is to be developed for any facility in question. The plan will provide an overall evaluation of the system and recommendations as to short- and long-term goals for the systems to achieve technical, financial and managerial viability (this term is referred to as "capacity development" specifically for drinking water facilities) and an implementation strategy.
- Several PWSs have already been identified with systemic problems, including physical, managerial and financial capacity challenges. However, the majority of these types of systems are technically in compliance with federal rules and existing regulations, but are clearly challenged in their overall capacity to manage the system. Financial capacity is a pervasive issue with these facilities. Some funding to address these issues may be available through the DWSRF technical assistance and capacity development set-aside funds for contractual evaluation and implementation. The section would evaluate these problems, determine a



source (such as a contractor if necessary) to develop an independent evaluation of an individual facility and develop an action plan for long-term compliance and “capacity.” This cooperative approach to addressing chronic problems with PWSs should be married with the EPA-approved Drinking Water Capacity Development Strategy and further enforced by development of formal Capacity Development regulations.

Kentucky has mandated in Senate Bill 409 (from legislative session 2000) that public water will be available to all Kentuckians by the year 2020. However, the DOW does not have regulatory authority to compel any public water system, including cities, to provide potable water service to potential customers. The DOW will continue to strive to meet the goal set out by Senate Bill 409 by pursuing other state loan or grant programs and encouraging regionalization of drinking water systems.

The Cabinet administers an Operator Training and Certification (Op Cert) program through the Division of Compliance Assistance. The Op Cert program provides training and issues certifications to ensure that individuals who operate drinking water systems are qualified and capable of performing their duties. The program presents a number of training opportunities for water treatment and distribution system operators throughout the Commonwealth. The following is a summary of 2004 activities and achievements:

- Days of CEU training = 11
- DW Certifications Issued = 381
- Certification Preparation Course Days = 64
- Exams Given = 499

The Op Cert program also assists the Kentucky Board of Certification of Water Treatment and Distribution System Operators.

Kentucky’s source water assessment and protection efforts have been very successful during this three-year reporting period. The Division of Water continues to demonstrate successfully its statewide and system wellhead protection programs, and source water protection strategies. The following is a summary of these programs including their overall effectiveness.

Statewide wellhead protection efforts during the three-year reporting period include:

- Underground Storage Tank (UST) closure regulations: UST regulations require higher cleanup standards for USTs located in wellhead protection areas. Locations are now available on GIS for interagency review.
- Construction Debris and Demolition (CDD) landfills: CDD landfills have to be lined in wellhead protection areas. Locations are now available on GIS for interagency review.



- Signage: Source water protection signs with emergency response phone numbers are located along major roadways that transect wellhead protection areas and surface water protection areas. Areas are being prioritized by susceptibility of the aquifer or intake. The DOW has completed 52 systems, including 16 in 2005.

System wellhead protection efforts during the three-year reporting period include:

- Georgetown Municipal Water and Sewer System: This system is located in Scott County but the major portion of the groundwater basin for Royal Springs is located in Fayette County. Lexington Fayette Urban County Government (planning and zoning, environmental issues) has worked closely with the Georgetown Municipal Water and Sewer System wellhead protection.
- Greater Fleming County Regional Water Commission: Received two loans through the DWSRF to purchase land in Lewis County where their wells are located in the Ohio River Alluvium. Purchased 181 acres with the first loan (\$357,500) and two land parcels (\$252,130) with the second. The purchases are part of the wellhead protection area.
- Worthington Municipal Water Works: Uses wells that are completed in the Ohio River Alluvium. The system qualified for DWSRF funds to purchase land in their wellhead protection area.
- Oldham County Water District: Received approval from the Public Service Commission for a tariff on their water rates so that it could sewer its wellhead protection area.
- Louisville Water Company: Utilizes both surface water intakes and a radial collector well located in the alluvium of the Ohio River. The system has worked with the Louisville Metropolitan Sewer Department to obtain a portion of the wellhead protection area to schedule sewer service that was not scheduled for several more years. Information pamphlets were distributed to all residents in the wellhead protection area concerning groundwater contamination issues.

Statewide and local source water protection efforts during the three-year reporting period include:

- Preparation of surface water protection plans (SWAPPs), generation of maps for contaminant source inventory and preparation of protection recommendations.
- Land acquisition with DWSRF set-aside funds. Several purchases have been funded and others are pending.



REPORT AVAILABILITY TO PUBLIC

This Triennial Report to the Governor on Kentucky's Capacity Development Program for October 1, 2002 – September 30, 2005 is a requirement of the USEPA for primacy states. This report must be submitted to the USEPA and also made public. The DOW makes this report available to the citizens of Kentucky by:

- Posting the report on the Cabinet's Web site (www.water.ky.gov/dw)
- Issuing a news release
- Making the report available at DOW headquarters and regional offices

Anyone having comments, concerns or questions regarding this report may contact the Division of Water at (502) 564-3410.

