

September 15, 2025

**TO:** Andrea Yang, Interim Executive Director, Greater Cincinnati Water Works (GCWW)  
**FROM:** Bruce Ross, Supervising Human Resources Analyst  
**COPIES:** Amy Reineke, GCWW Chief of Staff  
**SUBJECT:** Review of the Lead Service Line Crews, JHAs, Training and Management Oversight in connection with lead service line disposal procedures

#### **BACKGROUND**

In April 2025 in the course of a performance audit conducted by the City's Internal Audit Division, GCWW management was made aware that lead service lines removed by GCWW lead crews were not being disposed of in accordance with GCWW procedures. Because lead is a hazardous substance, federal law must be followed to protect employees from exposure, and the substance must be disposed of in accordance with state and federal hazardous waste regulations. GCWW created procedures in the form of Job Hazard Analyses (JHAs) in 2019 for safe handling and disposal of lead, specifying for removed lead to be disposed of in a newly added lead scrap container at GCWW's Main Station. The container was installed by City-wide scrap metal disposal contractor Cohen Brothers, who would pick up the container contents and return revenue from the sale of lead to the City. The City began to investigate in 2025, when GCWW learned that lead crews had not placed any lead in the container since its installation in 2019.

While the Internal Audit report reviewed the adequacy of GCWW procedures for lead disposal, this memo sets forth the material facts gathered during a review of management oversight and lead service line crew knowledge of and compliance with disposal procedures since the establishment of a lead disposal bin and lead safety JHAs in 2019.

Items reviewed in the investigation included:

- Correspondence related to lead safety JHAs and lead disposal
- Training provided by GCWW Safety between 2019 and 2025, including sign in sheets.
- Distribution Org Charts
- Investigation interview transcripts for Gregg Beasley and Victor McKinney
- Surveillance camera footage from Tennyson

## LEAD SERVICE LINE CREW ORGANIZATION

The lead service line crews consisted of two crews, each led by a Water Works Maintenance Crew Leader, as well as a Water Works Maintenance Worker, Truck Driver, and Motor Equipment Operator 1. Both crews were supervised by the Assistant Supervisor of Water Distribution Maintenance and based at the Tennyson Pump Station. The Water Works Maintenance Crew Leader was one of several direct reports supervised at a higher level by a Supervisor of Water Distribution Maintenance based at the GCWW Chester Park Complex (CPC) location.

### Upper-Level Management

TITLE	NAME	TENURE
Supervisor of Water Distribution Maintenance	Clay Hissett	<2019-2/2022
Supervisor of Water Distribution Maintenance	Rico Cosby	2/2022-2025

### LSL Front-Line Supervisor:

TITLE	NAME	TENURE
Assistant Supervisor of Water Distribution Maintenance	Gregg Beasley	9/2020-5/2025

### Crew 1:

TITLE	NAME	TENURE
Water Works Maintenance Crew Leader	Samuel Hill	<2019-8/2024 (retired 8/1/24)
Water Works Maintenance Crew Leader	Travis Stockstill	3/2025-5/2025
Motor Equipment Operator 1	Donta Buchanan	<2019-5/2025
Water Works Maintenance Worker	Victor McKinney	<2019-5/2025
Truck Driver	Derric Brazile	<2019-5/2025

Crew 2:

TITLE	NAME	TENURE
Water Works Maintenance Crew Leader	Dwayne Wallace	<2019-3/2025
Water Works Maintenance Crew Leader	Robert Stewart II	3/2025-5/2025
Motor Equipment Operator 1	Andre Givens	<2019-5/2025
Water Works Maintenance Worker	Alexia Hampton	<2019-1/2021
Water Works Maintenance Worker	Frank Asic	5/2021-5/2025
Truck Driver	Richard Burke	<2019-5/2025

**OTHER GCWW STAFF**

At Distribution Division request, a number of GCWW Supply Division employees located at the Richard Miller Treatment Plant, assisted the Lead Crews in the limited capacity of communication with City scrap metal contractor Cohen Brothers as to the need for a lead disposal container. These Supply division employees included Superintendent Alex Schmitz, Supervisor of Maintenance Keith Greiner, Supervisor of Maintenance Dave Browning, and Michael Loch.

Zach McCoy, Senior Environmental Safety Specialist in the Business Services Division, was involved in developing the JHAs specifying the lead service line disposal procedure and in providing lead awareness training sessions.

**CORRESPONDENCE TIMELINE**

The following timeline was established from email results of a 2019-2025 correspondence search conducted by the Law Department:

- 5/14/2019- Clay Hissett sent himself an email with notes including “Have a 10 yard dumpster placed at Tennyson.”
- 6/25/2019- Alex Schmitz emails Supervisor of Maintenance Keith Greiner, copying Clay Hissett: “The Distribution lead crew needs a small metal recycling dumpster to drop off small lead services lines that are replaced. The lead team works out of Tennyson, but there is not room at Tennyson for the placement for even a small dumpster. Clay and I talked and agreed that the Main Station pipe yard would be a good location to place the dumpster.” Alex asks Keith to contact the City-approved vendor, Cohen Brothers, Inc. about getting a lead dumpster placed at Main Station.
- 6/28/2019- Supervisor of Maintenance Dave Browning emails Alex Schmitz: “Alex, I have spoken to Moz Cohen and have scheduled the roll off dumpster (20 yard) to be delivered early

next week. Also I have spoken to Keith about its placement and have agreed on a spot, since I will be on vacation starting Wednesday next week I gave them both my number and Keith's as well to make sure it is placed appropriately and allow them entry when needed."

- 7/10/2019- Clay emails Senior Environmental/Safety Specialist Zack McCoy asking that he work with Richard Luckey, a Water Works Maintenance Crew Leader at CPC who was familiar with lead service line removal procedures to create 4-5 JHAs including "Disposing of LSL to scrap metal dumpster."
- 8/5/2019- Zack McCoy emails the newly created JHAs to Clay Hissett.
- 8/6/2019- Clay sends the five new Lead JHAs to Cathy Bailey and writes "The JHAs have been reviewed with the LSL crews."
- 8/26/2019- Clay sends JHAs to several supervisors, including the lead crew members and supervisor, and writes, "The JHAs will need to be reviewed with Distribution crews prior to work on LSL."
- 8/27/2019- Clay sends out email with JHAs to 133 GCWW employees, including the message, "FYI Please see the attached copies of the JHAs related to lead service lines and lead joints. Contact me with any information or if you would like further information about other JHAs."
- 9/20/2020- Gregg Beasley promoted from MEO1 to Water Works Maintenance Field Supervisor in charge of the lead service line crews and moves from Business Services Storeroom to the Distribution division.
- 4/15/2021- Keith Greiner emails Gregg Beasley, Subject: Tennyson rear lot, "I wasn't sure if you were aware or not but there is a dumpster at the Main Station dedicated for lead pipe that your crew removes. There had been complaints in the past about the pipe laying in the back lot up there."
- 4/16/2021- Dave Browning sends email to Gregg Beasley copying Michael Loch, "Greg, it was also discussed that when this dumpster is considered full that they should call me to have it picked up and switched with an empty one. I have received no calls, does this roll off need to be switched?" Per Law department, there was not a response to this email from Gregg Beasley.
- 10/9/2024- Rico Cosby sends email to Gregg Beasley asking him to dispose of a pile of lead at Tennyson in the lead bin at Main Station. Gregg responds, "I will take care of it."

## TRAINING REVIEW

GCWW Safety offered five sessions of Lead Safety Awareness in Construction training and two sessions of Lead Awareness Curriculum training that included review of the Lead Safety JHAs between 2020 and 2025:

### Lead Safety Awareness Training:

- 2/16/2021 (Attendees in this session included Gregg Beasley, Dwayne Wallace, Samuel Hill, Victor McKinney, Richard Burke, Donta Buchanan, Andre Givens)
- 6/30/2022 (No attendees from lead crew)

- 7/29/2022 (Attendees in this session included Gregg Beasley, Dwayne Wallace, Samuel Hill, Victor McKinney, Richard Burke, Frank Asic, Donta Buchanan, Andre Givens)
- 9/14/2023 (No attendees from lead crew)
- 4/4/2025 (Attendees included Travis Stockstill and Robert Stewart II)

Lead Awareness Curriculum:

- 9/12/2023 (No attendees from lead crew)
- 2/21/2025 (Attendees in this session included Gregg Beasley, Victor McKinney, Richard Burke, Frank Asic, Donta Buchanan, Derric Brazile)

**MANAGEMENT INVESTIGATION**

In April 2025, GCWW management was made aware that lead may not have been properly disposed of as Cohen Brothers had no record of picking up the lead dumpster since it was placed in 2019. Investigation interviews were held with then-current lead service line crew members on May 5, 2025, with the exception of Travis Stockstill who was on military leave during the week of the investigations. Lead crew employees who were interviewed on May 5<sup>th</sup> were again interviewed on May 21, 2025. Review of surveillance camera footage found that on Thursday, April 10<sup>th</sup>, Mr. Beasley left Tennyson in his personal vehicle at 12:15PM. A few minutes later, at 12:18PM, the video showed members of the lead crew including Victor McKinney, Frank Asic, and Derric Brazile begin loading 30-40 pieces of scrap lead into the back of a dump truck. The dump truck was driven away the following morning by Mr. McKinney but was not emptied in the dumpster at Main Station. Mr. McKinney later admitted in his investigation interview on May 21<sup>st</sup> that he gave the lead in the dump truck to a local scrapper in exchange for money and that he had been giving away the lead to scrappers over the years of the program. Mr. McKinney was charged with Theft and attended a pre-disciplinary hearing on June 23, 2025, and later resigned in lieu of termination on July 8, 2025. Mr. Beasley admitted in his interview on May 21<sup>st</sup> that he did not closely monitor the disposal of lead by his crews. Mr. Beasley received a written reprimand for using his personal vehicle instead of his assigned work vehicle over the course of several days and was also charged with neglect of duty for failure to exercise supervisory responsibility. Corrective action for Dishonesty was issued to the members of the lead service crews whose statements regarding how lead was disposed of in the May 5, 2025, interviews contradicted their responses in the May 21, 2025, interview.

**ANALYSIS**

From the evidence uncovered in the investigation, the first mention of establishing a lead disposal dumpster was made by Supervisor of Water Distribution Maintenance Clay Hissett in an email he sent to himself on May 14, 2019. His intention was to set it up at Tennyson Pump Station where the lead service line crews were based. The next mention of it was in an email sent by Supply Division Assistant Treatment Superintendent Alex Schmitz to Supervisor of Maintenance Keith Greiner on June 25, 2019, asking him to contact the City's approved vendor to provide a small recycling dumpster at Main Station since there was not a suitable location available at the Tennyson Pump Station. Another email sent by Supervisor of Maintenance Dave Browning on June 28, 2019, indicated that the recycling dumpster was to be delivered during the first week of July 2019. According to Mr. Schmitz, he was contacted by Mr. Hissett about obtaining a dumpster because the Supply division already had dumpsters supplied by Cohen and were familiar with the process to request dumpsters.

Mr. Schmitz stated that the Supply Division was not tasked with monitoring the contents of the lead dumpsters and no expectations were placed on Supply Division employees to monitor the contents of the dumpster. Based on the Supply Division's relationship with Cohen, they would contact the vendor to have the dumpster emptied upon request by the Distribution Division.

On July 10, 2019, Mr. Hissett reached out to Senior Environmental/Safety Specialist Zack McCoy to work with Water Works Maintenance Crew Leader Richard Luckey to create Job Hazard Analyses (JHAs) including one for the "disposing of LSL to scrap metal dumpster." The JHAs were created and provided to Mr. Hissett on August 5, 2019. The JHAs were later sent out to Distribution supervisors on August 26, 2019, and August 27, 2019, to all employees in the Distribution Division.

Gregg Beasley was promoted on September 20, 2020, to the position of front-line supervisor over the lead service line crews. Mr. Beasley was not a Distribution Division employee at the time the JHAs were first sent to Distribution Division employees, and he was not included on the email sent on August 26, 2019. It is not clear from the evidence found in the investigation how Mr. Beasley was initially trained in his role or how he was first introduced to the JHAs or received notice of the lead recycling bin at Main Station. Two emails were sent to Mr. Beasley on April 15<sup>th</sup> & 16<sup>th</sup> 2021 from Supply Division employees Keith Greiner and Dave Browning, which refer to the lead recycling bins. There was no evidence discovered that Mr. Beasley responded to acknowledge the references made to the lead dumpsters, nor is there any evidence that he alerted his supervisor or made any inquiry to determine how lead was being disposed of since it was not going into the lead dumpster. There were no further emails referencing the lead dumpsters and the lead crew until October 9, 2024, when Mr. Cosby asked Mr. Beasley to dispose of a pile of lead at Tennyson in the recycling bin at Main Station, and Mr. Beasley responded that he would take care of it, but the lack of any lead lines in the dumpsters shows that the disposal was not in accordance with the JHAs.

The GCWW Safety team conducted seven lead safety training sessions between February 2021 and April 2025. According to Zack McCoy, the lead safety JHAs were covered in these trainings and all employees who attended the trainings were made aware of the proper disposal of waste lead in the bin at Main Station. Four of the seven training sessions were primarily attended by members of the lead service line crews. Mr. Hissett and Mr. Cosby were copied on emails from Mr. McCoy after lead safety trainings occurred and they received copies of training sign-in sheets when they were submitted to the Training section.

After GCWW management was made aware of an internal audit investigation the department conducted its own investigation in conjunction with the Law Department which determined that Mr. McKinney, through his own admission, had been giving waste lead to local scrappers in exchange for money and not disposing the lead in the proper dumpster as outlined in the JHAs.

## **CONCLUSION**

The information uncovered during this investigation determined that the members of the lead service line crews and their front-line supervisor, Mr. Beasley received sufficient training on the lead safety JHAs, including the proper disposal of lead material. Information provided by Mr. McKinney in his interview on May 21, 2025, indicated that over a significant period of time he was not following the correct procedure to properly dispose of lead in the designated dumpster at Main Station. As the front-line supervisor, Mr. Beasley's responsibility was to monitor the work of the lead service line

crews. Mr. Beasley neglected his duty as a supervisor by not ensuring that the work of his crews were conducted in full accordance with the JHAs. Mr. Beasley's supervisor (Mr. Hissett and later Mr. Cosby) had management responsibilities over Distribution's Repair Section in addition to the Lead Service Line Crews however they did not have front line supervisory duties over either and did not work from the same location as Mr. Beasley and the Lead Service Line crews. . Mr. Cosby participated in monthly check-in meetings with Mr. Beasley and participated in periodic safety audits at Tennyson however, it was determined that he was not responsible for the lack of compliance with JHAs by the Lead Service Line crews. Similarly, the Supply division was not tasked with the monitoring of the lead disposal bins and were utilized only on an as-needed basis to communicate with the vendor who supplied the lead dumpsters.

## **RECOMMENDATIONS**

The Internal Audit report was concluded and submitted to City Manager Long on August 13, 2025. Several recommendations were made in the report to improve oversight of the lead removal process including:

- Strengthen management oversight and communication regarding lead service line removal and disposal.
- Create tracking and periodic reporting methods on the quantity of lead pipes removed, including the amount and monetary value of recycled lead.
- Maintain detailed records of all lead lines that have been left abandoned.

While the in-house GCWW lead crew was dismantled as a result of the recent investigation, if a decision is made to reinstate it in the future it is recommended that the Supervisor of Water Distribution Maintenance in charge of lead replacement take an active role in the training of the front-line supervisor to ensure that all tasks and responsibilities are understood. It is also recommended that the Supervisor of Water Distribution Maintenance maintain regular check-in meetings with the front-line supervisor, including in-person site visits of work locations and lead disposal sites to ensure compliance with established JHAs.

## **REFERENCE LIST**

- A. Lead Safety JHAs
- B. Referenced Emails
- C. Lead Safety Training Sign-In Sheets
- D. Investigation interview transcripts for Gregg Beasley and Victor McKinney
- E. Lead Service Line Replacement Program Internal Audit Report

<b>JOB OR OPERATION TITLE:</b> Remove TYVEK suit after Lead Service Line Work	<b>JOB HAZARD ANALYSIS FORM</b>	
<b>DEPARTMENT/DIVISION:</b> GCWW / Distribution / Lead Service Crews	<b>JOB LOCATION:</b> Distribution Run Sheet	<b>NAME OF EMPLOYEE DOING JOB:</b> Lead Service Line Repair Crews
<b>DATE PERFORMED:</b> July 15, 2019	<b>PERFORMED BY:</b> Richard Lucky, Craig Brink Zack McCoy	<b>VERIFIED BY:</b> GCWW Safety Team, verification in progress. *Note* Respiratory hazards/protection needs to be evaluated via personal air monitoring.
<b>SPECIAL OR PRIMARY HAZARDS:</b> Lead particulate exposure or cross contamination; eye injuries, hearing loss due to prolonged noise exposure from air compressors or diesel engines. <b>REQUIRED</b> Training for this operation: OSHA LEAD AWARENESS		
<b>PERSONAL PROTECTIVE EQUIPMENT REQUIRED OR RECOMMENDED:</b> Hard hat, safety glasses, ear plugs, steel toe boots, TYVEK suit, nitrile gloves, ( <b>respiratory protection TBD per personal air monitoring</b> ).		
BASIC JOB STEPS	EXISTING/POTENTIAL HAZARDS	CORRECTIVE MEASURES
When shedding TYVEK suit onsite. Find a safe location to doff TYVEK suit.	Cross contamination of lead particles. Struck by injuries, working in traffic, eye injuries, slips, trips, falls.	Leave nitrile gloves when handling TYVEK suit. If respiratory protection is being used, it should be the last PPE item to be removed. Wear safety glasses to prevent dust or debris from flying in eyes. Work within Traffic Control pattern devices. Use precaution and stable base for balance when doffing PPE.
Remove TYVEK suit.	Same as above	Continue to wear eye protection, nitrile gloves, and required PPE. If respiratory protection is worn it should be the last PPE item to be removed. Clean respirator after each use and store properly in designated shelf on truck.
Dispose of TYVEK suit.	Same as above.	Continue to wear nitrile gloves while handling possible contaminated PPE

<b>JOB OR OPERATION TITLE:</b> Disposing of Lead Service Line to Dumpster using backhoe	<b>JOB HAZARD ANALYSIS FORM</b>	
<b>DEPARTMENT/DIVISION:</b> GCWW / Distribution / Lead Service Crews	<b>JOB LOCATION:</b> Distribution Run Sheet	<b>NAME OF EMPLOYEE DOING JOB:</b> Lead Service Line Repair Crews
<b>DATE PERFORMED:</b> July 15, 2019	<b>PERFORMED BY:</b> Richard Lucky, Craig Brink Zack McCoy	<b>VERIFIED BY:</b> GCWW Safety Team, verification in progress.
<p><b>SPECIAL OR PRIMARY HAZARDS:</b> Lead particulate exposure or cross contamination; eye injuries, hearing loss due to prolonged noise exposure from air compressors or diesel engines. <b>REQUIRED</b> Training for this operation: OSHA LEAD AWARENESS, Vehicle accidents, struck by injuries.</p> <p><b>PERSONAL PROTECTIVE EQUIPMENT REQUIRED OR RECOMMENDED:</b> Hard hat, safety glasses, ear plugs, steel toe boots, TYVEK suit, nitrile gloves, (respiratory protection TBD per personal air monitoring).</p>		
<b>BASIC JOB STEPS</b>	<b>EXISTING/POTENTIAL HAZARDS</b>	<b>CORRECTIVE MEASURES</b>
Dispose of cut Lead Line in front bucket of backhoe on site.	Struck by injuries, pinch point/crushing injuries. Eye injuries, musculoskeletal injuries to back, legs or arms while manually loading into front loader bucket.	Ensure lead line is cut into manageable sections that fit into backhoe bucket. Size lead line into 3-5ft sections. Wear appropriate PPE including hard hat, safety glasses, nitrile gloves and leather palmed gloves. Use proper lifting techniques for lifting sections and placing in the bucket. Use two people to lift larger sections. Lift with legs and do not bend or twist while lifting.
Transport cut lead line to Main Station in backhoe.	Traffic accidents. Property damage. Struck by injuries.	See operating a backhoe on city streets JHA.
Dispose of cut Lead Line in roll off container at Main Station. Using Backhoe bucket.	Property damage. Struck by injuries.	Do not double handle or manually handle the demolished lead service line. Use the equipment to enter main station and dump into proper metal recycling bin. Use proper judgement and operator caution when approaching dumpster for offloading. If congested around the dumpster – use a spotter to ensure proper offloading.

<b>JOB OR OPERATION TITLE:</b> Cutting or sizing existing lead line to be replaced with copper.	<b>JOB HAZARD ANALYSIS FORM</b>	
<b>DEPARTMENT/DIVISION:</b> GCWW / Distribution	<b>JOB LOCATION:</b> Distribution Run Sheet	<b>NAME OF EMPLOYEE DOING JOB:</b> Lead Service Line Repair Crews
<b>DATE PERFORMED:</b> July 15, 2019	<b>PERFORMED BY:</b> Richard Lucky, Craig Brink, Zack McCoy	<b>VERIFIED BY:</b> GCWW Safety Team, verification in progress. <b>*Note*</b> Respiratory hazards/protection needs to be evaluated via personal air monitoring.
<b>SPECIAL OR PRIMARY HAZARDS:</b> Lead particulate exposure or cross contamination; struck by injuries, trench collapse, eye injuries, hearing loss due to prolonged noise exposure from air compressors or diesel engines. <b>REQUIRED</b> Training for this operation: OSHA LEAD AWARENESS		
<b>PERSONAL PROTECTIVE EQUIPMENT REQUIRED OR RECOMMENDED:</b> Hard hat, safety glasses, ear plugs, steel toe boots, TYVEK suit, nitrile gloves, Leather palmed gloves, ( <b>respiratory protection TBD per personal air monitoring</b> ).		
<b>BASIC JOB STEPS</b>	<b>EXISTING/POTENTIAL HAZARDS</b>	<b>CORRECTIVE MEASURES</b>
Enter excavation and hand dig to locate lead service line accesses.	Trench collapse; Abrasions or lacerations to hands while digging. Flying debris and splashing can cause eye injuries. Falling debris/tools into the excavation can cause struck by injury to person in excavation. Musculoskeletal/back/leg strains due to pulling or placement of tools.	Follow best safety excavation practices; trench protection required at 5' depth. Competent person inspects excavation periodically. Keep tools and debris clear from the edge of the excavation to prevent trip hazards and falling in excavation. Wear proper PPE including hard hat, safety glasses, leather or tech foam coated gloves to protect hands from scraps and lacerations at excavation edge. See trenching and shoring JHA. Use proper digging technique, stretch and warm up muscles before digging, See Digging and Shoveling JHA.
Release tension from backhoe on wire rope pulling mechanism and remove "Chicago" style fitting from wire rope pulling mechanism.	Exposure to lead particulates on tools and lead line. Cross contamination of lead particles to clothing or person. Pinch points to hands and fingers making connection. Puncture wounds from burrs in the wire rope.	Continue to wear TYVEK suit while handling wire rope and lead service line. Be aware of pinch points and keep fingers and hands away from locking mechanism. Wear nitrile gloves in addition to leather palmed gloves while handling wire rope and attachments. Use hand wipes after gloves are removed. Use good personal hygiene practices including washing hands before eating.
Use bladed pipe cutter tool to cut lead pipe into 5ft sections for disposal in backhoe bucket.	Exposure to lead particulates on tools and lead line. Cross contamination of lead particles to clothing or person. Pinch points to fingers and hands while using cutting tool. Lacerations or amputations to fingers getting caught or placed between the blade of the tool.	Continue to wear TYVEK suit while handling wire rope and lead service line. Be aware of pinch points and keep fingers and hands away from cutting mechanism. Wear nitrile gloves in addition to leather palmed gloves while handling wire rope and attachments

Cut lead service line with PVC shear/cutter	Lacerations and pinch points from cutting tool blade. Exposure to bare lead metal end. Eye injuries due to possible flying debris.	Don safety glasses for eye protection. Wear nitrile gloves and leather palmed gloves to reduce risk of lacerations and lead particulate contact with skin. Use good personal hygiene including discarding nitrile gloves after each action and use HANDIWIPES to clean hands when through with task. Keep hands away from mouth and face. Keep tools that come in contact with lead metal separate from other hand tools. Place in designated toolbox or bucket with lid- label accordingly.
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<b>JOB OR OPERATION TITLE:</b> Make lead to copper connection with compression fitting.	<b>JOB HAZARD ANALYSIS FORM</b>	
<b>DEPARTMENT/DIVISION:</b> GCWW / Distribution	<b>JOB LOCATION:</b> Distribution Run Sheet	<b>NAME OF EMPLOYEE DOING JOB:</b> Lead Service Line Repair Crews
<b>DATE PERFORMED:</b> June 26, 2019	<b>PERFORMED BY:</b> Richard Lucky, Shawn Binkley, Zack McCoy	<b>VERIFIED BY:</b> GCWW Safety Team, verification in progress. *Note*Respiratory hazards/protection needs to be evaluated via personal air monitoring.
<b>SPECIAL OR PRIMARY HAZARDS:</b> Lead particulate exposure or cross contamination; struck by injuries, trench collapse, eye injuries, hearing loss due to prolonged noise exposure from air compressors or diesel engines. <b>REQUIRED</b> Training for this operation: OSHA LEAD AWARENESS		
<b>PERSONAL PROTECTIVE EQUIPMENT REQUIRED OR RECOMMENDED:</b> Hard hat, safety glasses, ear plugs, steel toe boots, TYVEK suit, nitrile gloves, Leather palmed gloves, ( <b>respiratory protection TBD per personal air monitoring</b> ).		
<b>BASIC JOB STEPS</b>	<b>EXISTING/POTENTIAL HAZARDS</b>	<b>CORRECTIVE MEASURES</b>
Enter excavation and prep tools for compression plumbing connection.	Excavation cave in, Slips/Trips/Falls. Lead particles exposure or cross contamination while handling lead designated tools.	Follow best safety excavation practices; trench protection required at 5' depth. Competent person inspects excavation periodically. Keep tools and debris clear from the edge of the excavation to prevent trip hazards and falling in excavation. Wear proper PPE including hard hat, safety glasses, leather or tech foam coated gloves to protect hands from scraps and lacerations at excavation edge. Use a ladder or step if excavation is deeper than 4ft. See trenching and shoring JHA. Wear proper nitrile or poly coated gloves while handling lead designated tools. Don TYVEK Suit if sanding or shaping lead end of connection.
Shape lead connection by sanding or filing.	Respiratory hazards from filing lead plumbing joint. Skin exposure to lead particles. Cross contamination of clothing or tools with lead particles. Hazards to eyes by debris or particles. Pinch points to hands fingers while using file.	(Respiratory Protection Pending per personnel air monitoring assessment) Keep fitting wet with water from spray bottle to prevent dust from dispersing in air (Use wet method), while filing or sanding lead fitting. Wear all necessary PPE when working with lead line including: TYVEK Suit, nitrile gloves, safety glasses or goggles. Discard gloves and TYVEK immediately and appropriately when task is completed. Be aware of pinch point to hands and fingers while using filing/sanding tools.
Make compression connection using hammer and flare tools.	Struck by hazards from striking with hammer to make up compression fitting. Eye hazards from broken tools or	Use good form when hammering objects; keep hands and fingers out of strike zone. Ensure tools are inspected before use; do



<b>JOB OR OPERATION TITLE:</b> Lead line pull operation, using cable splice grip and backhoe.	<b>JOB HAZARD ANALYSIS FORM</b>	
<b>DEPARTMENT/DIVISION:</b> GCWW / Distribution	<b>JOB LOCATION:</b> Distribution Run Sheet	<b>NAME OF EMPLOYEE DOING JOB:</b> Lead Service Line Repair Crews
<b>DATE PERFORMED:</b> June 26, 2019	<b>PERFORMED BY:</b> Richard Lucky, Shawn Binkley, Zack McCoy	<b>VERIFIED BY:</b> GCWW Safety Team, verification in progress. <i>*Note* Respiratory hazards/protection needs to be evaluated via personal air monitoring.</i>
<b>SPECIAL OR PRIMARY HAZARDS:</b> Lead particulate exposure or cross contamination; struck by injuries, trench collapse, eye injuries, hearing loss due to prolonged noise exposure from air compressors or diesel engines. <b>REQUIRED</b> Training for this operation: OSHA LEAD AWARENESS		
<b>PERSONAL PROTECTIVE EQUIPMENT REQUIRED OR RECOMMENDED:</b> Hard hat, safety glasses, ear plugs, steel toe boots, TYVEK suit, nitrile gloves, Leather palmed gloves, ( <b>respiratory protection TBD per personal air monitoring</b> ).		
BASIC JOB STEPS	EXISTING/POTENTIAL HAZARDS	CORRECTIVE MEASURES
Arrive on site; assess and implement traffic control pattern.	Struck by injuries, working in traffic	Implement Traffic Control pattern devices. Inspect pattern for effectiveness. Add devices if needed. <b>STOP WORK</b> call supervisor if pattern ineffective.
Cut asphalt per utility locate. Excavate lead service line at (2) locations for replacement: at main branch and curb stop.	Using demo saw; pinch points, lacerations, respiratory hazards from possible exposure to silica and dust particulates, and dangerous noise exposure. Equipment struck by hazards, flying debris and dirt cause eye hazards, utility strikes. Hearing loss from prolonged exposure to diesel engines proximity.	For cut asphalt; see Cutting Pavement with Demo Saw JHA. Follow safety excavation practices including: Call before you dig, and utility locate; <b>STOP WORK</b> if questionable utility locates and contact supervisor. <b>Stay 10ft from all overhead utilities</b> . Wear hard hat and safety glasses always while excavating/observing excavation. Wear hearing protection when working near diesel equipment. Stand clear from equipment and traffic and use a spotter. Work within traffic pattern.
Enter excavation and hand dig to locate lead service line accesses.	Trench collapse; Abrasions or lacerations to hands while digging. Flying debris and splashing can cause eye injuries. Falling debris/tools into the excavation can cause struck by injury to person in excavation. Musculoskeletal/back/leg strains due to manual digging.	Follow best safety excavation practices; trench protection required at 5' depth. Competent person inspects excavation periodically. Keep tools and debris clear from the edge of the excavation to prevent trip hazards and falling in excavation. Wear proper PPE including hard hat, safety glasses, leather or tech foam coated gloves to protect hands from scraps and lacerations at excavation edge. See trenching and shoring JHA. Use proper digging technique, stretch and warm up muscles before digging, See Digging and Shoveling JHA.

Cut lead service line with PVC shear/cutter	Lacerations and pinch points from cutting tool blade. Exposure to bare lead metal end. Eye injuries due to possible flying debris.	Don safety glasses for eye protection. Wear nitrile gloves and leather palmed gloves to reduce risk of lacerations and lead particulate contact with skin. Use good personal hygiene including discarding nitrile gloves after each action and use HANDIWIPES to clean hands when through with task. Keep hands away from mouth and face. Keep tools that come in contact with lead metal separate from other hand tools. Place in designated toolbox or bucket with lid- label accordingly.
Prep and lube wire rope for thread through existing lead line.	Exposure to skin irritant, eye irritant chemicals in pipe lubricant i.e. Phoenix 27-XL Pipe Joint Lubricant. Exposure to lead particulates on wire rope. Puncture injuries to hands from handling wire rope from burrs.	Don proper eye, hand and body protection including, safety glasses, nitrile and leather gloves, TYVEK suit while maneuvering and prepping wire rope. Use to clean hands and properly discard TYVEK suit and gloves in trash when completed. Place wire in 6 mil poly bag or wrap until next use to prevent cross contamination.
Manual push or thread wire rope through existing lead line and attach splicing grip (new copper to lead) for line pull.	Hand puncture injuries from wire rope burrs. Exposure to lead particulates handling wire rope, exposure to pipe lubricant irritants on wire rope.	Wear TYVEK suit to prevent cross contamination of clothing when handling wire rope, nitrile gloves, leather gloves when forcing wire rope through pipe. Discard gloves appropriately.
Use Compressed air to “blow” or push poly line through existing lead line, to make splice connection to new copper and pull line through.	Respiratory hazards – blowing particulates through lead line. Possible Exposure to lead particulates. Projectile hazards to eyes from high pressure air blowing through line. High noise exposure from compressor and high-pressure air. Struck by injuries due to high pressure air lines rupturing or coming apart at “Chicago” style fittings. Hand abrasions or lacerations from handling air hose.	Remove all employees from receiving end of lead line wear forced air exits line. Shut off air pressure before inspecting if poly line has reached end for connection splice. Don eye protection for flying debris and hearing protection for high noise hazards of compressed air. Install pin fasteners in the coupling fittings to prevent fittings from flying projectile, struck by injuries. Wear gloves to protect hands when handling tools. Use hand wipes after handling tools that have come in contact with lead line.
Make connection to new copper using “pork chop” Chicago Style Grip & splicing grip “Chinese Finger cuff” to line; fasten to backhoe and pull existing line attached to new copper through existing lead line hole.	Exposure to lead particulates on tools and lead line. Cross contamination of lead particles to clothing or person. Pinch points to hands and fingers making connection. Equipment struck by hazards. Traffic struck by hazards.	Don nitrile gloves and TYVEK suit when handling lead line and tools that cut or manipulate lead line. Use good personal hygiene techniques, clean hands with hand wipes before eating or smoking. Be aware and keep hands and body away from pinch points. Inspect traffic pattern for effectiveness periodically; make changes as needed. Use a spotter when operating backhoe to pull line under street.
Cut old lead line to size and stage for recycling.	Exposure to lead particles, cross contamination of lead particles to vehicles, clothing or persons. Pinch	Place 6 mil poly in backhoe bucket or transporting container of old lead line. Place lengths of lead line on poly to



**Ross, Bruce**

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**From:** Hissett, Clay  
**Sent:** Tuesday, May 14, 2019 9:26 AM  
**To:** Hissett, Clay  
**Subject:** PB

Talk to Zac about  
Blood test  
Air testing from blowing a line  
Make blood testing a mandatory condition of working the LSL crew Ask crews if they are interested in fit testing— supply with respirators No grinding or melting of lead— must cut out section of water main to eliminate exposure to PB Have a 10 yard dumpster placed a Tennyson

Sent from my iPhone

## Ross, Bruce

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**From:** Schmitz, Alex  
**Sent:** Tuesday, June 25, 2019 1:26 PM  
**To:** Greiner, Keith  
**Cc:** Hissett, Clay  
**Subject:** Small Metal Dumpster at Main

Keith,

The Distribution lead crew needs a small metal recycling dumpster to drop off small lead services lines that are replaced. The lead team works out of Tennyson, but there is not room at Tennyson for the placement for even a small dumpster. Clay and I talked and agreed that the Main Station pipe yard would be a good location to place the dumpster. Do you have a contact at Cohen to get dumpster setup at Main? Also, is there a cost associated with a Cohen dumpster or is the cost subtracted from the scrap payment for the metal recycled?

Alex

Alexander Schmitz, P.E.  
Supervising Engineer  
Greater Cincinnati Water Works  
5651 Kellogg Ave.  
Cincinnati, Ohio 45230  
Office: 513 624-5836  
Cell: 513 969-2810

**Ross, Bruce**

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**From:** Hissett, Clay  
**Sent:** Friday, June 28, 2019 1:12 PM  
**To:** Brink, Craig  
**Subject:** FW: Lead roll off dumpster

FYI

Clay Hissett  
Distribution Supervisor  
513.607.2488  
[Clay.hissett@gcww.cincinnati-oh.gov](mailto:Clay.hissett@gcww.cincinnati-oh.gov)  
[Lead.myGCWW.org](http://Lead.myGCWW.org)

---

**From:** Schmitz, Alex  
**Sent:** Friday, June 28, 2019 12:56 PM  
**To:** Hissett, Clay  
**Subject:** FW: Lead roll off dumpster

Clay,

See below about dumpster.

Alex

---

**From:** Browning, Dave <[Dave.Browning@gcww.cincinnati-oh.gov](mailto:Dave.Browning@gcww.cincinnati-oh.gov)>  
**Sent:** Friday, June 28, 2019 12:52 PM  
**To:** Schmitz, Alex <[Alex.Schmitz@gcww.cincinnati-oh.gov](mailto:Alex.Schmitz@gcww.cincinnati-oh.gov)>  
**Cc:** Greiner, Keith <[Keith.Greiner@gcww.cincinnati-oh.gov](mailto:Keith.Greiner@gcww.cincinnati-oh.gov)>; Sluder, Kevin <[Kevin.Sluder@gcww.cincinnati-oh.gov](mailto:Kevin.Sluder@gcww.cincinnati-oh.gov)>; Bedinghaus, Joseph <[Joseph.Bedinghaus@gcww.cincinnati-oh.gov](mailto:Joseph.Bedinghaus@gcww.cincinnati-oh.gov)>; Loch, Michael <[Michael.Loch@gcww.cincinnati-oh.gov](mailto:Michael.Loch@gcww.cincinnati-oh.gov)>; Montgomery, Stephen <[Stephen.Montgomery@gcww.cincinnati-oh.gov](mailto:Stephen.Montgomery@gcww.cincinnati-oh.gov)>  
**Subject:** Lead roll off dumpster

**Alex, I have spoken to Moz Cohen and have scheduled the roll off dumpster (20 yard) to be delivered early next week. Also I have spoken to Keith about its placement and have agreed on a spot, since I will be on vacation starting Wednesday next week I gave them both my number and Keith's as well to make sure it is placed appropriately and allow them entry when needed.**

***Dave Browning***  
**Supervisor of Maintenance**

**Office ( 513 ) 321-0960 ext.11**

**Cell (513 ) 373-8472**

**Email [dave.browning@gcww.cincinnati-oh.gov](mailto:dave.browning@gcww.cincinnati-oh.gov)**

## Ross, Bruce

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**From:** Hissett, Clay  
**Sent:** Wednesday, July 10, 2019 1:43 PM  
**To:** McCoy, Zachary  
**Cc:** Luckey, Richard  
**Subject:** More LSL JHAs

Zac, good day

I would like to have Richard Luckey work with you putting together about four or five JHA. These would be short JHAs identifying the just a small task of renewing the LSL such as cutting the LSL. See below for the lists of tasks.

1. Removing Tyvek suits
2. Removing uniforms
3. Disposing of LSL to scrap metal dumpster
4. Cutting of LSL
5. Using of wipes to clean hands

Richard will be available most anytime, he is currently on light duty.

Clay Hissett  
Distribution Supervisor  
513.607.2488  
[Clay.hissett@gcww.cincinnati-oh.gov](mailto:Clay.hissett@gcww.cincinnati-oh.gov)  
[Lead.myGCWW.org](http://Lead.myGCWW.org)

## Ross, Bruce

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**From:** McCoy, Zachary  
**Sent:** Monday, August 5, 2019 12:38 PM  
**To:** Hissett, Clay  
**Subject:** RE: LSL JHAs  
**Attachments:** SFTY\_-Job\_Hazard\_Analysis\_(JHA)\_-\_ Making a Lead to Copper Connection.doc; SFTY\_-Job\_Hazard\_Analysis\_(JHA)\_-Cutting Lead Service for Disposal.doc; SFTY\_-Job\_Hazard\_Analysis\_(JHA)\_-Disposing of Lead Line to Dumpster using a Backhoe.doc; SFTY\_-Job\_Hazard\_Analysis\_(JHA)\_-Doffing TYVEK suit.doc; SFTY\_-Job\_Hazard\_Analysis\_(JHA)\_-Lead Line Pull.doc

Clay,

The following JHAs have been created for tasks for lead service line work.

1. Making a lead to copper connection
2. Cutting lead service line for disposal
3. Disposing of lead line to dumpster using backhoe
4. Doffing TYVEK suit
5. Lead line pull

If you have any other questions let me know.

Zack McCoy  
Senior Environmental Safety Specialist  
Greater Cincinnati Water Works  
513-439-2483 mobile (best)  
513-591-6817 desk

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**From:** Hissett, Clay  
**Sent:** Monday, August 05, 2019 12:29 PM  
**To:** McCoy, Zachary  
**Subject:** LSL JHA

Zac,

When you have a moment please send me a list of the new JHAs for the LSL crews. Thanks

Clay Hissett  
Distribution Supervisor  
513.607.2488  
[Clay.hissett@gcww.cincinnati-oh.gov](mailto:Clay.hissett@gcww.cincinnati-oh.gov)  
[Lead.myGCWW.org](http://Lead.myGCWW.org)

## Ross, Bruce

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**From:** Hissett, Clay  
**Sent:** Tuesday, August 6, 2019 9:05 AM  
**To:** Bailey, Cathy  
**Subject:** FW: LSL JHAs  
**Attachments:** SFTY\_-Job\_Hazard\_Analysis\_(JHA)\_-\_ Making a Lead to Copper Connection.doc; SFTY\_-Job\_Hazard\_Analysis\_(JHA)\_-Cutting Lead Service for Disposal.doc; SFTY\_-Job\_Hazard\_Analysis\_(JHA)\_-Disposing of Lead Line to Dumpster using a Backhoe.doc; SFTY\_-Job\_Hazard\_Analysis\_(JHA)\_-Doffing TYVEK suit.doc; SFTY\_-Job\_Hazard\_Analysis\_(JHA)\_-Lead Line Pull.doc

FYI

Please see the attached five JHAs identifying the newly generated safety procedures relating to lead service replacement work. The JHAs have been reviewed with the LSL crews.

Clay Hissett  
Distribution Supervisor  
513.607.2488  
[Clay.hissett@gcww.cincinnati-oh.gov](mailto:Clay.hissett@gcww.cincinnati-oh.gov)  
[Lead.myGCWW.org](http://Lead.myGCWW.org)

---

**From:** McCoy, Zachary  
**Sent:** Monday, August 05, 2019 12:38 PM  
**To:** Hissett, Clay  
**Subject:** RE: LSL JHAs

Clay,

The following JHAs have been created for tasks for lead service line work.

1. Making a lead to copper connection
2. Cutting lead service line for disposal
3. Disposing of lead line to dumpster using backhoe
4. Doffing TYVEK suit
5. Lead line pull

If you have any other questions let me know.

Zack McCoy  
Senior Environmental Safety Specialist  
Greater Cincinnati Water Works  
513-439-2483 mobile (best)  
513-591-6817 desk

---

**From:** Hissett, Clay <[Clay.Hissett@gcww.cincinnati-oh.gov](mailto:Clay.Hissett@gcww.cincinnati-oh.gov)>  
**Sent:** Monday, August 05, 2019 12:29 PM

**To:** McCoy, Zachary <[Zachary.McCoy@gcww.cincinnati-oh.gov](mailto:Zachary.McCoy@gcww.cincinnati-oh.gov)>

**Subject:** LSL JHA

Zac,

When you have a moment please send me a list of the new JHAs for the LSL crews. Thanks

Clay Hissett

Distribution Supervisor

513.607.2488

[Clay.hissett@gcww.cincinnati-oh.gov](mailto:Clay.hissett@gcww.cincinnati-oh.gov)

[Lead.myGCWW.org](http://Lead.myGCWW.org)

## Ross, Bruce

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**From:** Hissett, Clay  
**Sent:** Monday, August 26, 2019 8:09 PM  
**To:** Apel, Mark; Berry, Ronnie; Brink, Craig; Burroughs, Michael; Camp, Brent; Caplinger, Andy; Fairbanks, Cortez; Kuhl, Brandon; Lewis, Kevin; Payne, Ronald; Samuels, Rodney; Smith, Antoine; Wingard, Jay  
**Cc:** Predmore, Steve; Bolton, Jermaine; Cosby, Rico; Disanto, Andrew; Hissett, Clay (Clay.Hissett@gcww.cincinnati-oh.gov); Fleming, Jason  
**Subject:** Lead Service Line replacement JHA  
**Attachments:** SFTY\_-Job\_Hazard\_Analysis\_(JHA)\_-Disposing of Lead Line to Dumpster using a Backhoe.doc; SFTY\_-Job\_Hazard\_Analysis\_(JHA)\_-Doffing TYVEK suit.doc; SFTY\_-Job\_Hazard\_Analysis\_(JHA)\_-Lead Line Pull.doc; Caulk lead joint.doc; SFTY\_-Job\_Hazard\_Analysis\_(JHA)\_-\_ Making a Lead to Copper Connection.doc; SFTY\_-Job\_Hazard\_Analysis\_(JHA)\_-Cutting Lead Service for Disposal.doc

FYI

Please see the attached six JHAs identifying the newly generated safety procedures relating to lead service replacement work. The JHAs will need to be reviewed with Distribution crews prior to work on LSL.

Clay Hissett  
Distribution Supervisor  
513.607.2488  
[Clay.hissett@gcww.cincinnati-oh.gov](mailto:Clay.hissett@gcww.cincinnati-oh.gov)  
[Lead.myGCWW.org](http://Lead.myGCWW.org)

## Ross, Bruce

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**From:** Luckey, Richard  
**Sent:** Thursday, May 29, 2025 8:40 AM  
**To:** Ross, Bruce; Heyd, Katie  
**Cc:** Cosby, Rico  
**Subject:** Fw: Lead work related JHAs  
**Attachments:** Caulk lead joint.doc; SFTY\_-Job\_Hazard\_Analysis\_(JHA)\_-\_ Making a Lead to Copper Connection.doc; SFTY\_-Job\_Hazard\_Analysis\_(JHA)\_-Cutting Lead Service for Disposal.doc; SFTY\_-Job\_Hazard\_Analysis\_(JHA)\_-Disposing of Lead Line to Dumpster using a Backhoe.doc; SFTY\_-Job\_Hazard\_Analysis\_(JHA)\_-Doffing TYVEK suit.doc; SFTY\_-Job\_Hazard\_Analysis\_(JHA)\_-Lead Line Pull.doc

*Richard Luckey  
Supervisor of Water Distribution Maintenance  
441-2677*

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**From:** Predmore, Steve <Steve.Predmore@gcww.cincinnati-oh.gov>  
**Sent:** Wednesday, May 28, 2025 4:02 PM  
**To:** Luckey, Richard <Richard.Luckey@gcww.cincinnati-oh.gov>  
**Cc:** Cosby, Rico <Rico.Cosby@gcww.cincinnati-oh.gov>  
**Subject:** Fw: Lead work related JHAs

FYI, this was sent to everyone in 2019

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**From:** Hissett, Clay <Clay.Hissett@gcww.cincinnati-oh.gov>  
**Sent:** Tuesday, August 27, 2019 9:08 AM  
**To:** Ajao, Obadare <Obadare.Ajao@gcww.cincinnati-oh.gov>; Alston, Kendall <Kendall.Alston@gcww.cincinnati-oh.gov>; Apel, Mark <Mark.Apel@gcww.cincinnati-oh.gov>; Ashcraft, Zachary <Zachary.Ashcraft@gcww.cincinnati-oh.gov>; Asic, Frank <Frank.Asic@gcww.cincinnati-oh.gov>; Axle, Anthony <Anthony.Axle@gcww.cincinnati-oh.gov>; Bearfield, Jeff <Jeff.Bearfield@gcww.cincinnati-oh.gov>; Benton, John <John.Benton@gcww.cincinnati-oh.gov>; Berry, Ronnie <Ronnie.Berry@gcww.cincinnati-oh.gov>; Berry, Tyrone <Tyrone.Berry@gcww.cincinnati-oh.gov>; Binkley, Shawn <Shawn.Binkley@gcww.cincinnati-oh.gov>; Bolling, Cecil <Cecil.Bolling@gcww.cincinnati-oh.gov>; Bolton, Jermaine <Jermaine.Bolton@gcww.cincinnati-oh.gov>; Bowman, Ken <Ken.Bowman@gcww.cincinnati-oh.gov>; Brazile, Derric <Derric.Brazile@gcww.cincinnati-oh.gov>; Brink, Craig <Craig.Brink@gcww.cincinnati-oh.gov>; Brockmann, Edward <Edward.Brockmann@gcww.cincinnati-oh.gov>; Brown, Dalyn <Dalyn.Brown@gcww.cincinnati-oh.gov>; Brown, Raymond <Raymond.Brown@gcww.cincinnati-oh.gov>; Buchanan, Donta <Donta.Buchanan@gcww.cincinnati-oh.gov>; Burke, Richard <Richard.Burke@gcww.cincinnati-oh.gov>; Burroughs, Michael <Michael.Burroughs@gcww.cincinnati-oh.gov>; Camarca, Nicholas <Nicholas.Camarca@gcww.cincinnati-oh.gov>; Camp, Brent <Brent.Camp@gcww.cincinnati-oh.gov>; Caplinger, Andy <Andy.Caplinger@gcww.cincinnati-oh.gov>; Chapman, Woodrow <Woodrow.Chapman@gcww.cincinnati-oh.gov>; Clements, Jeffery <Jeffery.Clements@gcww.cincinnati-oh.gov>; Cockrell, Joseph <Joseph.Cockrell@gcww.cincinnati-oh.gov>; Cook, Adrian <Adrian.Cook@gcww.cincinnati-oh.gov>; Cook, Frankie <Frankie.Cook@gcww.cincinnati-oh.gov>; Cosby, Rico <Rico.Cosby@gcww.cincinnati-oh.gov>; Crawford, Steven <Steven.Crawford@gcww.cincinnati-oh.gov>; Crawford, Vanessa <Vanessa.Crawford@gcww.cincinnati-oh.gov>; Crew, Kavin <Kavin.Crew@gcww.cincinnati-oh.gov>; Daniels, Constance <Constance.Daniels@gcww.cincinnati-oh.gov>; Davis, Milton <Milton.Davis@gcww.cincinnati-oh.gov>; Disanto, Andrew <Andrew.Disanto@gcww.cincinnati-oh.gov>;

Dorn, Tracey <Tracey.Dorn@gcww.cincinnati-oh.gov>; Dove, James <James.Dove@gcww.cincinnati-oh.gov>; Duskin, Donielle <Donielle.Duskin@gcww.cincinnati-oh.gov>; Ellis, Christopher <Christopher.Ellis@gcww.cincinnati-oh.gov>; Fairbanks, Cortez <Cortez.Fairbanks@gcww.cincinnati-oh.gov>; Fath, Michael <Michael.Fath@gcww.cincinnati-oh.gov>; Ficker, Jeff <Jeff.Ficker@gcww.cincinnati-oh.gov>; Filak, Jason <Jason.Filak@gcww.cincinnati-oh.gov>; Fleming, Jason <Jason.Fleming@gcww.cincinnati-oh.gov>; Folson, Alice <alice.folson@gcww.cincinnati-oh.gov>; Fox, Josh <Josh.Fox@gcww.cincinnati-oh.gov>; Fox, Michael <Michael.Fox@gcww.cincinnati-oh.gov>; Gavan, Ed <Ed.Gavan@gcww.cincinnati-oh.gov>; Gibson, Traci <Traci.Gibson@gcww.cincinnati-oh.gov>; Givens, Andre <Andre.Givens@gcww.cincinnati-oh.gov>; Glacken, James <James.Glacken@gcww.cincinnati-oh.gov>; Glenn, Roderick <roderick.glenn@gcww.cincinnati-oh.gov>; Greene, Ernie <Ernie.Greene@gcww.cincinnati-oh.gov>; Greer, Jasper <Jasper.Greer@gcww.cincinnati-oh.gov>; Hampton, Alexia <Alexia.Hampton@gcww.cincinnati-oh.gov>; Hash, Brian <Brian.Hash@gcww.cincinnati-oh.gov>; Hein, Mark <Mark.Hein@gcww.cincinnati-oh.gov>; Hill, Sam <Sam.Hill@gcww.cincinnati-oh.gov>; Hissett, Clay <Clay.Hissett@gcww.cincinnati-oh.gov>; Hubbard, Althea <Althea.Hubbard@gcww.cincinnati-oh.gov>; Jones, Rosareatha <Rosareatha.Jones@gcww.cincinnati-oh.gov>; Jones, Tony <Tony.Jones@gcww.cincinnati-oh.gov>; Kelly, Garrick <Garrick.Kelly@gcww.cincinnati-oh.gov>; Kelly, James <James.Kelly@gcww.cincinnati-oh.gov>; Kuhl, Brandon <Brandon.Kuhl@gcww.cincinnati-oh.gov>; Lackey, Vincent <Vincent.Lackey@gcww.cincinnati-oh.gov>; Lawrence, Treva <Treva.Lawrence@gcww.cincinnati-oh.gov>; Lemberg, Michael <Michael.Lemberg@gcww.cincinnati-oh.gov>; Lewis, Kevin <Kevin.Lewis@gcww.cincinnati-oh.gov>; Lindemann, Christopher <Christopher.Lindemann@gcww.cincinnati-oh.gov>; Lipps, Jacob <Jacob.Lipps@gcww.cincinnati-oh.gov>; Louis, Douglas <Douglas.Louis@gcww.cincinnati-oh.gov>; Lovette, Garnet <Garnet.Lovette@gcww.cincinnati-oh.gov>; Luckey, Richard <Richard.Luckey@gcww.cincinnati-oh.gov>; Martini, Lawrence <Lawrence.Martini@gcww.cincinnati-oh.gov>; McCabe, Kyle <Kyle.McCabe@gcww.cincinnati-oh.gov>; McCarnan, David <David.McCarnan@gcww.cincinnati-oh.gov>; McKinney, Victor <Victor.McKinney@gcww.cincinnati-oh.gov>; McQueary, Ben <Ben.McQueary@gcww.cincinnati-oh.gov>; Mitchell, Jeff <Jeff.Mitchell@gcww.cincinnati-oh.gov>; Moustafa, Lela <Lela.Moustafa@gcww.cincinnati-oh.gov>; Mundy, Mark <Mark.Mundy@gcww.cincinnati-oh.gov>; Murray, Alvin <Alvin.Murray@gcww.cincinnati-oh.gov>; Nelms, Lonzine <lonzine.nelms@gcww.cincinnati-oh.gov>; Nixon, Robin <Robin.Nixon@gcww.cincinnati-oh.gov>; Nocheck, Andrew <Andrew.Nocheck@gcww.cincinnati-oh.gov>; OBrien, Shawn <Shawn.OBrien@gcww.cincinnati-oh.gov>; Owens, Val <Val.Owens@gcww.cincinnati-oh.gov>; Payne, Ronald <Ronald.Payne@gcww.cincinnati-oh.gov>; Pennington, Rodney <Rodney.Pennington@gcww.cincinnati-oh.gov>; Poggemann, Joe <Joe.Poggemann@gcww.cincinnati-oh.gov>; Predmore, Steve <Steve.Predmore@gcww.cincinnati-oh.gov>; Primus, Zebra <Zebra.Primus@gcww.cincinnati-oh.gov>; Re, Robbie <Robbie.Re@gcww.cincinnati-oh.gov>; Reeves, Michael <Michael.Reeves@gcww.cincinnati-oh.gov>; Rhodes, Carlanders <Carlanders.Rhodes@gcww.cincinnati-oh.gov>; Rosemond, Aaron <Aaron.Rosemond@gcww.cincinnati-oh.gov>; Safety Training; Samuels, Rodney <Rodney.Samuels@gcww.cincinnati-oh.gov>; Smith, Antoine <Antoine.Smith@gcww.cincinnati-oh.gov>; Smith, Darrell <Darrell.Smith@gcww.cincinnati-oh.gov>; Southard, Ronald <Ronald.Southard@gcww.cincinnati-oh.gov>; Spurlock, Jeremy <Jeremy.Spurlock@gcww.cincinnati-oh.gov>; Stanton, Daryl <Daryl.Stanton@gcww.cincinnati-oh.gov>; Stephens, Christopher <Christopher.Stephens@gcww.cincinnati-oh.gov>; Stephens-Bryant, Kathleen <Kathleen.Stephens-Bryant@gcww.cincinnati-oh.gov>; Stepp, Gary <Gary.Stepp@gcww.cincinnati-oh.gov>; Sterling, Jamal <Jamal.Sterling@gcww.cincinnati-oh.gov>; Stewart, Robert <Robert.Stewart@gcww.cincinnati-oh.gov>; Stockstill, Travis <Travis.Stockstill@gcww.cincinnati-oh.gov>; Summers, Curtis <Curtis.Summers@gcww.cincinnati-oh.gov>; Sweet, Lisa <Lisa.Sweet@gcww.cincinnati-oh.gov>; Taylor, Lonzell <Lonzell.Taylor@gcww.cincinnati-oh.gov>; Thomas, Larry <Larry.Thomas@gcww.cincinnati-oh.gov>; Tolbert, Sean <Sean.Tolbert@gcww.cincinnati-oh.gov>; Tolbert, Todd <Todd.Tolbert@gcww.cincinnati-oh.gov>; Trotter, Ernie <Ernie.Trotter@gcww.cincinnati-oh.gov>; Tucker, Richard <Richard.Tucker@gcww.cincinnati-oh.gov>; VandeRyt, James <James.VandeRyt@gcww.cincinnati-oh.gov>; VandeRyt, Phillip <Phillip.VandeRyt@gcww.cincinnati-oh.gov>; VandeRyt, Steven <Steven.VandeRyt@gcww.cincinnati-oh.gov>; Wallace, Dwayne <Dwayne.Wallace@gcww.cincinnati-oh.gov>; Washington, Eddie <Eddie.Washington@gcww.cincinnati-oh.gov>; Washington, Syreda <Syreda.Washington@gcww.cincinnati-oh.gov>; Watkins, DeAngilo <DeAngilo.Watkins@gcww.cincinnati-oh.gov>; Watson, Deandre <Deandre.Watson@gcww.cincinnati-oh.gov>; Watson, Steven <Steven.Watson@gcww.cincinnati-oh.gov>; Weimer, Joey <Joey.Weimer@gcww.cincinnati-oh.gov>; Williams, Raymond <Raymond.Williams@gcww.cincinnati-oh.gov>; Willis, Jamal <Jamal.Willis@gcww.cincinnati-oh.gov>; Willis, Tremaine <Tremaine.Willis@gcww.cincinnati-oh.gov>

**Subject:** Lead work related JHAs

FYI

Please see the attached copies of the JHAs related to lead service lines and lead joints. Contact me with any information or if you would like further information about other JHAs.

Clay Hissett  
Distribution Supervisor  
513.607.2488

[Clay.hissett@gcww.cincinnati-oh.gov](mailto:Clay.hissett@gcww.cincinnati-oh.gov)  
[Lead.myGCWW.org](http://Lead.myGCWW.org)

<b>JOB HAZARD ANALYSIS</b>		JOB OR OPERATION TITLE Caulk Lead Hub	
DEPARTMENT/DIVISION GCWW/ Distribution	JOB LOCATION Various		TITLE OF EMPLOYEE DOING JOB
DATE PERFORMED 8/16/19	PERFORMED BY C. Hissett, C. Fairbanks, R. Luckey		VERIFIED BY
<b>SPECIAL OR PRIMARY HAZARDS</b> Inhalation or ingestion of lead particles			
<b>PERSONAL PROTECTIVE EQUIPMENT REQUIRED OR RECOMMENDED</b> Hard Hat, Hearing Protection, Eye Protection, Goggles, respirators fitted half face, Nitrile Gloves, Leather Gloves, Tyvek Suit, Safety Shoes			
BASIC JOB STEPS	EXISTING AND POTENTIAL HAZARDS	RECOMMENDED CORRECTIVE MEASURE	
1. Excavate to proper depth and width	1. Cave in, unstable trench wall	1. Refer to Trenching and Shoring JHA	
2. Install shoring in the excavation	2. Dropping shoring equipment, pinch points	2. Refer to Trenching and Shoring JHA	
3. Caulk joint using pneumatic caulking gun, inserting lead service line material as filler material	3. Inhalation, or ingestion of lead particles, pinch points, unsecured air lines	3. Use of fitted half face respirators, goggles, nitrile gloves, leather gloves, hearing protection, Tyvek coveralls, hardhat	
4. Excavate fully around pipe to allow for caulking of entire joint	4. Strain, contusion, back injury, over exertion	Refer to Digging and Shoveling JHA	
5. Caulk entire joint flush to face of joint, using multiple size caulking tools	5. Inhalation, or ingestion of lead particles, pinch points, unsecured air lines	5. Use of fitted half face respirators, goggles, nitrile gloves, leather gloves, hearing protection, Tyvek overalls, hardhat	
6. Coverall repair with plastic sheeting	6. Possible laceration while cutting plastic sheeting	6. Use of gloves, proper cutting tool	

<b>JOB OR OPERATION TITLE:</b> Make lead to copper connection with compression fitting.	<b>JOB HAZARD ANALYSIS FORM</b>	
<b>DEPARTMENT/DIVISION:</b> GCWW / Distribution	<b>JOB LOCATION:</b> Distribution Run Sheet	<b>NAME OF EMPLOYEE DOING JOB:</b> Lead Service Line Repair Crews
<b>DATE PERFORMED:</b> June 26, 2019	<b>PERFORMED BY:</b> Richard Lucky, Shawn Binkley, Zack McCoy	<b>VERIFIED BY:</b> GCWW Safety Team, verification in progress. *Note*Respiratory hazards/protection needs to be evaluated via personal air monitoring.
<b>SPECIAL OR PRIMARY HAZARDS:</b> Lead particulate exposure or cross contamination; struck by injuries, trench collapse, eye injuries, hearing loss due to prolonged noise exposure from air compressors or diesel engines. <b>REQUIRED</b> Training for this operation: OSHA LEAD AWARENESS		
<b>PERSONAL PROTECTIVE EQUIPMENT REQUIRED OR RECOMMENDED:</b> Hard hat, safety glasses, ear plugs, steel toe boots, TYVEK suit, nitrile gloves, Leather palmed gloves, ( <b>respiratory protection TBD per personal air monitoring</b> ).		
BASIC JOB STEPS	EXISTING/POTENTIAL HAZARDS	CORRECTIVE MEASURES
Enter excavation and prep tools for compression plumbing connection.	Excavation cave in, Slips/Trips/Falls. Lead particles exposure or cross contamination while handling lead designated tools.	Follow best safety excavation practices; trench protection required at 5' depth. Competent person inspects excavation periodically. Keep tools and debris clear from the edge of the excavation to prevent trip hazards and falling in excavation. Wear proper PPE including hard hat, safety glasses, leather or tech foam coated gloves to protect hands from scraps and lacerations at excavation edge. Use a ladder or step if excavation is deeper than 4ft. See trenching and shoring JHA. Wear proper nitrile or poly coated gloves while handling lead designated tools. Don TYVEK Suit if sanding or shaping lead end of connection.
Shape lead connection by sanding or filing.	Respiratory hazards from filing lead plumbing joint. Skin exposure to lead particles. Cross contamination of clothing or tools with lead particles. Hazards to eyes by debris or particles. Pinch points to hands fingers while using file.	(Respiratory Protection Pending per personnel air monitoring assessment) Keep fitting wet with water from spray bottle to prevent dust from dispersing in air (Use wet method), while filing or sanding lead fitting. Wear all necessary PPE when working with lead line including: TYVEK Suit, nitrile gloves, safety glasses or goggles. Discard gloves and TYVEK immediately and appropriately when task is completed. Be aware of pinch point to hands and fingers while using filing/sanding tools.
Make compression connection using hammer and flare tools.	Struck by hazards from striking with hammer to make up compression fitting. Eye hazards from broken tools or	Use good form when hammering objects; keep hands and fingers out of strike zone. Ensure tools are inspected before use; do



<b>JOB OR OPERATION TITLE:</b> Cutting or sizing existing lead line to be replaced with copper.	<b>JOB HAZARD ANALYSIS FORM</b>	
<b>DEPARTMENT/DIVISION:</b> GCWW / Distribution	<b>JOB LOCATION:</b> Distribution Run Sheet	<b>NAME OF EMPLOYEE DOING JOB:</b> Lead Service Line Repair Crews
<b>DATE PERFORMED:</b> July 15, 2019	<b>PERFORMED BY:</b> Richard Lucky, Craig Brink, Zack McCoy	<b>VERIFIED BY:</b> GCWW Safety Team, verification in progress. <b>*Note*</b> Respiratory hazards/protection needs to be evaluated via personal air monitoring.
<b>SPECIAL OR PRIMARY HAZARDS:</b> Lead particulate exposure or cross contamination; struck by injuries, trench collapse, eye injuries, hearing loss due to prolonged noise exposure from air compressors or diesel engines. <b>REQUIRED</b> Training for this operation: OSHA LEAD AWARENESS		
<b>PERSONAL PROTECTIVE EQUIPMENT REQUIRED OR RECOMMENDED:</b> Hard hat, safety glasses, ear plugs, steel toe boots, TYVEK suit, nitrile gloves, Leather palmed gloves, ( <b>respiratory protection TBD per personal air monitoring</b> ).		
<b>BASIC JOB STEPS</b>	<b>EXISTING/POTENTIAL HAZARDS</b>	<b>CORRECTIVE MEASURES</b>
Enter excavation and hand dig to locate lead service line accesses.	Trench collapse; Abrasions or lacerations to hands while digging. Flying debris and splashing can cause eye injuries. Falling debris/tools into the excavation can cause struck by injury to person in excavation. Musculoskeletal/back/leg strains due to pulling or placement of tools.	Follow best safety excavation practices; trench protection required at 5' depth. Competent person inspects excavation periodically. Keep tools and debris clear from the edge of the excavation to prevent trip hazards and falling in excavation. Wear proper PPE including hard hat, safety glasses, leather or tech foam coated gloves to protect hands from scraps and lacerations at excavation edge. See trenching and shoring JHA. Use proper digging technique, stretch and warm up muscles before digging, See Digging and Shoveling JHA.
Release tension from backhoe on wire rope pulling mechanism and remove "Chicago" style fitting from wire rope pulling mechanism.	Exposure to lead particulates on tools and lead line. Cross contamination of lead particles to clothing or person. Pinch points to hands and fingers making connection. Puncture wounds from burrs in the wire rope.	Continue to wear TYVEK suit while handling wire rope and lead service line. Be aware of pinch points and keep fingers and hands away from locking mechanism. Wear nitrile gloves in addition to leather palmed gloves while handling wire rope and attachments. Use hand wipes after gloves are removed. Use good personal hygiene practices including washing hands before eating.
Use bladed pipe cutter tool to cut lead pipe into 5ft sections for disposal in backhoe bucket.	Exposure to lead particulates on tools and lead line. Cross contamination of lead particles to clothing or person. Pinch points to fingers and hands while using cutting tool. Lacerations or amputations to fingers getting caught or placed between the blade of the tool.	Continue to wear TYVEK suit while handling wire rope and lead service line. Be aware of pinch points and keep fingers and hands away from cutting mechanism. Wear nitrile gloves in addition to leather palmed gloves while handling wire rope and attachments

Cut lead service line with PVC shear/cutter	Lacerations and pinch points from cutting tool blade. Exposure to bare lead metal end. Eye injuries due to possible flying debris.	Don safety glasses for eye protection. Wear nitrile gloves and leather palmed gloves to reduce risk of lacerations and lead particulate contact with skin. Use good personal hygiene including discarding nitrile gloves after each action and use HANDIWIPES to clean hands when through with task. Keep hands away from mouth and face. Keep tools that come in contact with lead metal separate from other hand tools. Place in designated toolbox or bucket with lid- label accordingly.
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<b>JOB OR OPERATION TITLE:</b> Disposing of Lead Service Line to Dumpster using backhoe	<b>JOB HAZARD ANALYSIS FORM</b>	
<b>DEPARTMENT/DIVISION:</b> GCWW / Distribution / Lead Service Crews	<b>JOB LOCATION:</b> Distribution Run Sheet	<b>NAME OF EMPLOYEE DOING JOB:</b> Lead Service Line Repair Crews
<b>DATE PERFORMED:</b> July 15, 2019	<b>PERFORMED BY:</b> Richard Lucky, Craig Brink Zack McCoy	<b>VERIFIED BY:</b> GCWW Safety Team, verification in progress.
<b>SPECIAL OR PRIMARY HAZARDS:</b> Lead particulate exposure or cross contamination; eye injuries, hearing loss due to prolonged noise exposure from air compressors or diesel engines. <b>REQUIRED</b> Training for this operation: OSHA LEAD AWARENESS, Vehicle accidents, struck by injuries.		
<b>PERSONAL PROTECTIVE EQUIPMENT REQUIRED OR RECOMMENDED:</b> Hard hat, safety glasses, ear plugs, steel toe boots, TYVEK suit, nitrile gloves, (respiratory protection TBD per personal air monitoring).		
BASIC JOB STEPS	EXISTING/POTENTIAL HAZARDS	CORRECTIVE MEASURES
Dispose of cut Lead Line in front bucket of backhoe on site.	Struck by injuries, pinch point/crushing injuries. Eye injuries, musculoskeletal injuries to back, legs or arms while manually loading into front loader bucket.	Ensure lead line is cut into manageable sections that fit into backhoe bucket. Size lead line into 3-5ft sections. Wear appropriate PPE including hard hat, safety glasses, nitrile gloves and leather palmed gloves. Use proper lifting techniques for lifting sections and placing in the bucket. Use two people to lift larger sections. Lift with legs and do not bend or twist while lifting.
<b>Transport cut lead line to Main Station in backhoe.</b>	Traffic accidents. Property damage. Struck by injuries.	See operating a backhoe on city streets JHA.
<b>Dispose of cut Lead Line in roll off container at Main Station. Using Backhoe bucket.</b>	Property damage. Struck by injuries.	Do not double handle or manually handle the demolished lead service line. Use the equipment to enter main station and dump into proper metal recycling bin. Use proper judgement and operator caution when approaching dumpster for offloading. If congested around the dumpster – use a spotter to ensure proper offloading.

<b>JOB OR OPERATION TITLE:</b> Remove TYVEK suit after Lead Service Line Work	<b>JOB HAZARD ANALYSIS FORM</b>	
<b>DEPARTMENT/DIVISION:</b> GCWW / Distribution / Lead Service Crews	<b>JOB LOCATION:</b> Distribution Run Sheet	<b>NAME OF EMPLOYEE DOING JOB:</b> Lead Service Line Repair Crews
<b>DATE PERFORMED:</b> July 15, 2019	<b>PERFORMED BY:</b> Richard Lucky, Craig Brink Zack McCoy	<b>VERIFIED BY:</b> GCWW Safety Team, verification in progress. *Note* Respiratory hazards/protection needs to be evaluated via personal air monitoring.
<b>SPECIAL OR PRIMARY HAZARDS:</b> Lead particulate exposure or cross contamination; eye injuries, hearing loss due to prolonged noise exposure from air compressors or diesel engines. <b>REQUIRED</b> Training for this operation: OSHA LEAD AWARENESS		
<b>PERSONAL PROTECTIVE EQUIPMENT REQUIRED OR RECOMMENDED:</b> Hard hat, safety glasses, ear plugs, steel toe boots, TYVEK suit, nitrile gloves, ( <b>respiratory protection TBD per personal air monitoring</b> ).		
BASIC JOB STEPS	EXISTING/POTENTIAL HAZARDS	CORRECTIVE MEASURES
When shedding TYVEK suit onsite. Find a safe location to doff TYVEK suit.	Cross contamination of lead particles. Struck by injuries, working in traffic, eye injuries, slips, trips, falls.	Leave nitrile gloves when handling TYVEK suit. If respiratory protection is being used, it should be the last PPE item to be removed. Wear safety glasses to prevent dust or debris from flying in eyes. Work within Traffic Control pattern devices. Use precaution and stable base for balance when doffing PPE.
Remove TYVEK suit.	Same as above	Continue to wear eye protection, nitrile gloves, and required PPE. If respiratory protection is worn it should be the last PPE item to be removed. Clean respirator after each use and store properly in designated shelf on truck.
Dispose of TYVEK suit.	Same as above.	Continue to wear nitrile gloves while handling possible contaminated PPE

<b>JOB OR OPERATION TITLE:</b> Lead line pull operation, using cable splice grip and backhoe.	<b>JOB HAZARD ANALYSIS FORM</b>	
<b>DEPARTMENT/DIVISION:</b> GCWW / Distribution	<b>JOB LOCATION:</b> Distribution Run Sheet	<b>NAME OF EMPLOYEE DOING JOB:</b> Lead Service Line Repair Crews
<b>DATE PERFORMED:</b> June 26, 2019	<b>PERFORMED BY:</b> Richard Lucky, Shawn Binkley, Zack McCoy	<b>VERIFIED BY:</b> GCWW Safety Team, verification in progress. <i>*Note* Respiratory hazards/protection needs to be evaluated via personal air monitoring.</i>
<b>SPECIAL OR PRIMARY HAZARDS:</b> Lead particulate exposure or cross contamination; struck by injuries, trench collapse, eye injuries, hearing loss due to prolonged noise exposure from air compressors or diesel engines. <b>REQUIRED</b> Training for this operation: OSHA LEAD AWARENESS		
<b>PERSONAL PROTECTIVE EQUIPMENT REQUIRED OR RECOMMENDED:</b> Hard hat, safety glasses, ear plugs, steel toe boots, TYVEK suit, nitrile gloves, Leather palmed gloves, ( <b>respiratory protection TBD per personal air monitoring</b> ).		
BASIC JOB STEPS	EXISTING/POTENTIAL HAZARDS	CORRECTIVE MEASURES
Arrive on site; assess and implement traffic control pattern.	Struck by injuries, working in traffic	Implement Traffic Control pattern devices. Inspect pattern for effectiveness. Add devices if needed. <b>STOP WORK</b> call supervisor if pattern ineffective.
Cut asphalt per utility locate. Excavate lead service line at (2) locations for replacement: at main branch and curb stop.	Using demo saw; pinch points, lacerations, respiratory hazards from possible exposure to silica and dust particulates, and dangerous noise exposure. Equipment struck by hazards, flying debris and dirt cause eye hazards, utility strikes. Hearing loss from prolonged exposure to diesel engines proximity.	For cut asphalt; see Cutting Pavement with Demo Saw JHA. Follow safety excavation practices including: Call before you dig, and utility locate; <b>STOP WORK</b> if questionable utility locates and contact supervisor. <b>Stay 10ft from all overhead utilities</b> . Wear hard hat and safety glasses always while excavating/observing excavation. Wear hearing protection when working near diesel equipment. Stand clear from equipment and traffic and use a spotter. Work within traffic pattern.
Enter excavation and hand dig to locate lead service line accesses.	Trench collapse; Abrasions or lacerations to hands while digging. Flying debris and splashing can cause eye injuries. Falling debris/tools into the excavation can cause struck by injury to person in excavation. Musculoskeletal/back/leg strains due to manual digging.	Follow best safety excavation practices; trench protection required at 5' depth. Competent person inspects excavation periodically. Keep tools and debris clear from the edge of the excavation to prevent trip hazards and falling in excavation. Wear proper PPE including hard hat, safety glasses, leather or tech foam coated gloves to protect hands from scraps and lacerations at excavation edge. See trenching and shoring JHA. Use proper digging technique, stretch and warm up muscles before digging, See Digging and Shoveling JHA.

Cut lead service line with PVC shear/cutter	Lacerations and pinch points from cutting tool blade. Exposure to bare lead metal end. Eye injuries due to possible flying debris.	Don safety glasses for eye protection. Wear nitrile gloves and leather palmed gloves to reduce risk of lacerations and lead particulate contact with skin. Use good personal hygiene including discarding nitrile gloves after each action and use HANDIWIPES to clean hands when through with task. Keep hands away from mouth and face. Keep tools that come in contact with lead metal separate from other hand tools. Place in designated toolbox or bucket with lid- label accordingly.
Prep and lube wire rope for thread through existing lead line.	Exposure to skin irritant, eye irritant chemicals in pipe lubricant i.e. Phoenix 27-XL Pipe Joint Lubricant. Exposure to lead particulates on wire rope. Puncture injuries to hands from handling wire rope from burrs.	Don proper eye, hand and body protection including, safety glasses, nitrile and leather gloves, TYVEK suit while maneuvering and prepping wire rope. Use to clean hands and properly discard TYVEK suit and gloves in trash when completed. Place wire in 6 mil poly bag or wrap until next use to prevent cross contamination.
Manual push or thread wire rope through existing lead line and attach splicing grip (new copper to lead) for line pull.	Hand puncture injuries from wire rope burrs. Exposure to lead particulates handling wire rope, exposure to pipe lubricant irritants on wire rope.	Wear TYVEK suit to prevent cross contamination of clothing when handling wire rope, nitrile gloves, leather gloves when forcing wire rope through pipe. Discard gloves appropriately.
Use Compressed air to “blow” or push poly line through existing lead line, to make splice connection to new copper and pull line through.	Respiratory hazards – blowing particulates through lead line. Possible Exposure to lead particulates. Projectile hazards to eyes from high pressure air blowing through line. High noise exposure from compressor and high-pressure air. Struck by injuries due to high pressure air lines rupturing or coming apart at “Chicago” style fittings. Hand abrasions or lacerations from handling air hose.	Remove all employees from receiving end of lead line wear forced air exits line. Shut off air pressure before inspecting if poly line has reached end for connection splice. Don eye protection for flying debris and hearing protection for high noise hazards of compressed air. Install pin fasteners in the coupling fittings to prevent fittings from flying projectile, struck by injuries. Wear gloves to protect hands when handling tools. Use hand wipes after handling tools that have come in contact with lead line.
Make connection to new copper using “pork chop” Chicago Style Grip & splicing grip “Chinese Finger cuff” to line; fasten to backhoe and pull existing line attached to new copper through existing lead line hole.	Exposure to lead particulates on tools and lead line. Cross contamination of lead particles to clothing or person. Pinch points to hands and fingers making connection. Equipment struck by hazards. Traffic struck by hazards.	Don nitrile gloves and TYVEK suit when handling lead line and tools that cut or manipulate lead line. Use good personal hygiene techniques, clean hands with hand wipes before eating or smoking. Be aware and keep hands and body away from pinch points. Inspect traffic pattern for effectiveness periodically; make changes as needed. Use a spotter when operating backhoe to pull line under street.
Cut old lead line to size and stage for recycling.	Exposure to lead particles, cross contamination of lead particles to vehicles, clothing or persons. Pinch	Place 6 mil poly in backhoe bucket or transporting container of old lead line. Place lengths of lead line on poly to



## Ross, Bruce

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**From:** Loch, Michael  
**Sent:** Tuesday, April 20, 2021 9:05 AM  
**To:** Greiner, Keith; Beasley, Greg  
**Cc:** Browning, Dave  
**Subject:** RE: Tennyson rear lot

I can meet anytime today just let me know what time works best for both of you

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**From:** Greiner, Keith  
**Sent:** Friday, April 16, 2021 5:58 AM  
**To:** Loch, Michael  
**Cc:** Browning, Dave  
**Subject:** FW: Tennyson rear lot

Dave FYI below.

Mike,

See highlighted area below. Let me know when a good time for you to meet with Greg at Tennyson to discuss the shelving.

Thank you,  
Have a nice day!

Keith Greiner  
Supervisor of Maintenance  
GCWW Supply Division  
Facility Maintenance  
Mobile – (513)708-8097  
Office – (513)321-0960  
[Keith.Greiner@GCWW.Cincinnati-OH.gov](mailto:Keith.Greiner@GCWW.Cincinnati-OH.gov)

---

**From:** Beasley, Greg <[Greg.Beasley@gcww.cincinnati-oh.gov](mailto:Greg.Beasley@gcww.cincinnati-oh.gov)>  
**Sent:** Thursday, April 15, 2021 2:13 PM  
**To:** Greiner, Keith <[Keith.Greiner@gcww.cincinnati-oh.gov](mailto:Keith.Greiner@gcww.cincinnati-oh.gov)>  
**Subject:** Re: Tennyson rear lot

Sounds good just let me know when you are ready to meet.

Get [Outlook for iOS](#)

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**From:** Greiner, Keith <[Keith.Greiner@gcww.cincinnati-oh.gov](mailto:Keith.Greiner@gcww.cincinnati-oh.gov)>  
**Sent:** Thursday, April 15, 2021 2:11:07 PM  
**To:** Beasley, Greg <[Greg.Beasley@gcww.cincinnati-oh.gov](mailto:Greg.Beasley@gcww.cincinnati-oh.gov)>  
**Subject:** Tennyson rear lot

Hi Greg,

I wasn't sure if you were aware or not but there is a dumpster at the Main Station dedicated for lead pipe that your crew removes. There had been complaints in the past about the pipe laying in the back lot up there. Before Craig Brink retired we had discussed making some shelves in the garage down there for your crew as well, originally we were going to make them out of wood but with the crazy price hike in lumber these days I was going to get the weld shop involved. Mike Loch the Weld shop supervisor is on vacation this week so I will see if he could meet you and myself there next week sometime to get a game plan together if you would like. If you need anything let me know.

Thank you,  
Have a nice day!

Keith Greiner  
Supervisor of Maintenance  
GCWW Supply Division  
Facility Maintenance  
Mobile – (513)708-8097  
Office – (513)321-0960  
[Keith.Greiner@GCWW.Cincinnati-OH.gov](mailto:Keith.Greiner@GCWW.Cincinnati-OH.gov)

**Ross, Bruce**

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**From:** Browning, Dave  
**Sent:** Friday, April 16, 2021 6:22 AM  
**To:** Beasley, Greg  
**Cc:** Loch, Michael  
**Subject:** Lead pipe dumpster

Greg, it was also discussed that when this dumpster is considered full that they should call me to have it picked up and switched with a empty one. I have received no calls, does this roll off need to be switched?

***Dave Browning  
Supervisor of Maintenance  
321-0960 ext.11  
373-8472 cell***

## Ross, Bruce

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**From:** Kappers, Kevin  
**Sent:** Wednesday, October 9, 2024 11:38 AM  
**To:** Cosby, Rico  
**Subject:** RE: LSLR properly dispose of lead lines

Thanks!

### **Kevin Kappers, P.E.**

Lead Program Manager | Greater Cincinnati Water Works  
Desk: 513-591-5057 | Cell: 513-516-6501  
[Kevin.Kappers@gcww.cincinnati-oh.gov](mailto:Kevin.Kappers@gcww.cincinnati-oh.gov)

---

**From:** Cosby, Rico <[Rico.Cosby@gcww.cincinnati-oh.gov](mailto:Rico.Cosby@gcww.cincinnati-oh.gov)>  
**Sent:** Wednesday, October 9, 2024 10:45 AM  
**To:** Beasley, Greg <[Greg.Beasley@gcww.cincinnati-oh.gov](mailto:Greg.Beasley@gcww.cincinnati-oh.gov)>  
**Subject:** RE: LSLR properly dispose of lead lines

Thanks,

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**From:** Beasley, Greg <[Greg.Beasley@gcww.cincinnati-oh.gov](mailto:Greg.Beasley@gcww.cincinnati-oh.gov)>  
**Sent:** Wednesday, October 9, 2024 10:44 AM  
**To:** Cosby, Rico <[Rico.Cosby@gcww.cincinnati-oh.gov](mailto:Rico.Cosby@gcww.cincinnati-oh.gov)>  
**Subject:** RE: LSLR properly dispose of lead lines

I will take care of it.

**Gregg Beasley**  
**Asst. Supervisor of Water Distribution Maintenance**  
**513 441-5481**

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**From:** Cosby, Rico <[Rico.Cosby@gcww.cincinnati-oh.gov](mailto:Rico.Cosby@gcww.cincinnati-oh.gov)>  
**Sent:** Wednesday, October 9, 2024 10:35 AM  
**To:** Beasley, Greg <[Greg.Beasley@gcww.cincinnati-oh.gov](mailto:Greg.Beasley@gcww.cincinnati-oh.gov)>  
**Subject:** LSLR properly dispose of lead lines

Gregg,

I was recently notified that at Tennyson Station, the Lead Crews has a mountain of Lead just sitting around the dumpster from worksites. When you have time can we retrieve the lead and safely dispose of it I believe at Main Station dumpster. You can contact Michail Weimer to see where to properly dispose of the lead.

Thanks,  
Rico

*Rico Cosby*

Greater Cincinnati Water Works  
Assistant Treatment Superintendent Distribution Division  
Repair, Planning & Lead Sections  
4747 Spring Grove Av. Cincinnati, Oh 45232  
Office # 513-591-5020 or Cell #513-300-6567  
[Rico.Cosby@gcww.cincinnati-oh.gov](mailto:Rico.Cosby@gcww.cincinnati-oh.gov)



[Lead.myGCWW.org](http://Lead.myGCWW.org)

# P00057

## Training Attendance Sheet

**Course Title:** Lead SAFETY in Construction

**Course Description** (If this is a Staff/Section Training-Meeting or Job Specific Training, a timed agenda must be provided):

Lead HAZARDS & Health Affects  
 (SHA) Lead Crew site specific Lead SAFETY controls.  
 NIOSH Report coverage.  
 \* social distancing & face coverings were practiced/worn

**Instructor:** Z. McCay

Instructors requesting training credit must also sign in as a course participant & have their Supervisor sign below.

**NOTE:** Your supervisor's signature is **ONLY** required **below** for any videos/e-learning not previously approved by the GCWW L&D Section. Provide video/e-learning links for review. For individual viewings of videos, webinars, etc., the surveys or certificates are required and must be attached. If a survey or certificate isn't available, a supervisor's signature must be included.

**Supervisor Signature:** Z. McCay

**Beginning Date:** 2/16/21

**Ending Date:** 2/16/21

**Start Time:** 12:00PM

**End Time:** 2pm

**Number of Hours:** 2 Hrs 30 min

<u>Employee ID #</u>	<u>Print Name</u>	<u>Signature</u>
1. <u>15581</u>	<u>Dwayne Wallace</u>	<u>Dwayne Wallace</u>
2. <u>264705</u>	<u>Richard Burke</u>	<u>Richard Burke</u>
3. <u>15610</u>	<u>Donta Buchanan</u>	<u>Donta Buchanan</u>
4. <u>16243</u>	<u>Andre Given</u>	<u>Andre Given</u>
5. <u>15569</u>	<u>Gregg Beasley</u>	<u>Gregg Beasley</u>
6. <u>157641</u>	<u>Samuel Hill</u>	<u>Samuel Hill</u>
7. <u>22817</u>	<u>Victor McElroy</u>	<u>Victor McElroy</u>
8.		
9.		
10.		
11.		
12.		
13.		
14.		
15.		

Please return the completed form and any required documentation to your Divisional Training Registrar in the **Learning & Development Section**



Learning and Development: Course # P00057

# 0020

8/1/2022

## Training Attendance Sheet

Course Title: Lead Hazards in Construction

**Course Description** (If this is a Staff/Section Training-Meeting or Job Specific Training, a timed agenda must be provided): Discuss lead exposure potential in the construction, GCWW specific (lead line repair), and hazards of exposure. Including health effects of acute and chronic exposure to lead. Discuss methods of exciating and controlling lead hazards. Discuss program requirements. Cover the 2021 NIOSH study.

Instructor: Zack McCoy

Instructors requesting training credit must also sign in as a course participant & have their Supervisor sign below.

**NOTE:** Your supervisor's signature is ONLY required below for any video/e-learning not previously approved by the GCWW L&D Section. Provide video/e-learning links for review. For individual viewings of videos, webinars, etc., the surveys or certificates are required and must be attached. If a survey or certificate isn't available, a supervisor's signature must be included.

Supervisor Signature: Zack McCoyBeginning Date: 7/29/2022Ending Date: 7/29/2022Start Time: 2:00pmEnd Time: 3:00pmNumber of Hours: 1.5 hrs

Employee ID #
1. <u>22817</u>
2. <u>15581</u>
3. <u>300100</u>
4. <u>260665</u>
5. <u>23325</u>
6. <u>15610</u>
7. <u>18328</u>
8. <u>16243</u>
9. <u>15589</u>
10. <u>15264</u>
11. <u>37452</u>
12. <u>25608</u>
13. _____
14. _____
15. _____

Print Name

Victor Mack  
Dwight Wallace  
Jeff Mitchell  
Richard Burke  
FRANK ASK  
Donta Buchanan  
Rico Coss  
ANDRE GIVENS  
Gregory Risty  
Samuel Hill  
Tara Sturgill  
Kevin Mercier

Signature

Zack McCoy  
Dwight Wallace  
Jeff Mitchell  
Richard Burke  
FRANK ASK  
Donta Buchanan  
Rico Coss  
ANDRE GIVENS  
Gregory Risty  
Samuel Hill  
Tara C Sturgill  
Kevin Mercier

Please return the completed form and any required documentation to your Divisional Training Registrar in the Learning & Development Section



OP 5 755 002  
2/26/25

## Training Attendance Sheet

GCWW Training: Course # \_\_\_\_\_

Course Title: LEAD HAZARD Awareness

Course Description (If this is a Staff/Section Training-Meeting or Job Specific Training, a timed agenda must be provided):

HSI course online; completed as a group (classroom)

Instructor: HSI online course / Z. McCoy

Instructors requesting training credit must also sign in as a course participant.

**NOTE:** Your supervisor's signature is ONLY required below for any videos/e-learning over 30 minutes. For viewings of videos, webinars, etc., the surveys or certificates are required and must be attached. If a survey or certificate isn't available, a supervisor's signature must be included.

Supervisor Signature: Z. McCoy

Beginning Date: 2-21-2025

Ending Date: 2-21-2025

1 HR. 30 min

Start Time: 0800 Hrs

End Time: 0830

Number of Hours: 0.5 Hrs

EMPLOYEE ID #	PRINT NAME	SIGNATURE
1. <u>33430</u>	<u>Zack McCoy</u>	<u>Z. McCoy</u>
2. <u>20922</u>	<u>Derrick Brazile</u>	<u>D. Brazile</u>
3. <u>35288</u>	<u>Jeff Mitchell</u>	<u>J. Mitchell</u>
4. <u>15610</u>	<u>Donta Buchanan</u>	<u>Donta Buchanan</u>
5. <u>23325</u>	<u>FRANKASIC</u>	<u>Frankasic</u>
6. <u>26465</u>	<u>Richard Burke</u>	<u>Richard Burke</u>
7. <u>92817</u>	<u>Victoria MacLennan</u>	<u>V. MacLennan</u>
8. <u>15579</u>	<u>Gregg Beasley</u>	<u>Gregg Beasley</u>
9.		
10.		
11.		
12.		
13.		
14.		
15.		

Please allow up to 3 weeks for training credit to be entered into CHRIS. Send the completed form and any required documentation to your Divisional Training Registrar in the GCWW Training Section.

Revised 11.2024

**Minnich, Vicky**

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**From:** McCoy, Zachary  
**Sent:** Tuesday, February 25, 2025 11:00 AM  
**To:** Minnich, Vicky  
**Cc:** Beasley, Greg; Cosby, Rico  
**Subject:** Lead Hazard Awareness & Respiratory Protection TNG sign in sheets 2-21-2025  
**Attachments:** Respir.Protect.TNG.2-21-2025.pdf; Lead.Haz.Awareness.TNG.2-21-2025.pdf

Hi Vicky,

See attached training sign in sheets for last Friday's safety courses down at Tennyson, for the Lead Line Repair crews. We used designated preview safety courses from the new HSI learning platform. We completed them as a classroom (with the course up on the big screen). Feedback was overall good from employees – so that's good. Each course is listed in the system for 30 to 35 minutes to complete (minimum for OSHA compliance); however, we spent extra time discussing each separate topic's content – as pertains to GCWW policies and procedures and how they affect the Lead Crews. So, I validated we went an hour for each topic. The safety team will make sure to enter the credit in the HSI system.

Thanks for your assistance and please let me know if you have any questions.

Zack

Zack McCoy  
Senior Environmental Safety Specialist  
**Greater Cincinnati Water Works**  
Phone – (513) 439-2483



1005700223/6/25

## Training Attendance Sheet

GCWW Training: Course # \_\_\_\_\_

Course Title: Lead HAZARD Awareness

Course Description (If this is a Staff/Section Training-Meeting or Job Specific Training, a timed agenda must be provided):

NIOSH Lead Findings, VHAs, HSI online Lead Hazard Awareness  
Hygiene, HEPA Vacuum

Instructor: HSI course, Z. McCoy, V. Berling

*Instructors requesting training credit must also sign in as a course participant.*

**NOTE:** Your supervisor's signature is ONLY required below for any videos/e-learning over 30 minutes. For viewings of videos, webinars, etc., the surveys or certificates are required and must be attached. If a survey or certificate isn't available, a supervisor's signature must be included.

Supervisor Signature: 

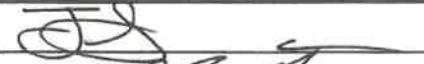
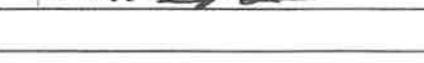
Beginning Date: 4-4-2025

Ending Date: 4-4-2025

Start Time: 0730

End Time: 0830

Number of Hours: 1 Hr

EMPLOYEE ID #	PRINT NAME	SIGNATURE
1. <u>34586</u>	<u>TRANS STOCKSTILL</u>	
2. <u>29550</u>	<u>Robert Stewart</u>	
3. <u>16243</u>	<u>Andre Givens</u>	
4.		
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15.		

Please allow up to 3 weeks for training credit to be entered into CHRIS. Send the completed form and any required documentation to your Divisional Training Registrar in the GCWW Training Section.

Revised 11.2024

## **Victor McKinney Investigation Interview 5/2/2025**

### **Jason Fleming**

So the city is doing an internal audit of our lead replacement program, which is not a big deal. They do audits on a lot of our processes and procedures over the years and this is the one they've done now. One of the things that's come out of that is concerns over disposal of lead pipes that were removed from the ground and what the process is and where they've gone and how we've handled them. Some inconsistencies have come up. We're trying to figure out what the situation is so we can take the next step and deal with it. So, you know, I've interviewed Gregg. I've interviewed Luckey, Stew. I'm going to get all you guys to try to figure out what's happened, what our protocol has been in the past, what we do now, so that we can answer that questions they have and make sure we're doing it the right way. Any questions about that before I ask the first question?

### **Victor McKinney**

Yeah, one. You don't mean well, I don't know right just yet but one, we should have had a meeting before now because, you know. You know, what brought this about? It's been this long. It's the first time, you know, we had a meeting for us, you know what I mean? This type of stuff that, that's the only thing I'm asking you so.

### **Jason Fleming**

When we're done, if you need to follow up with another meeting and talk more about it. This will be pretty quick, just a few basic questions so we can collect some information. So, the first one is, can you describe to us what the process is that you guys use to dispose of the lead service lines you remove?

### **Victor McKinney**

Basically, we, how can I say this, basically we, ones we don't pull, they stay in the ground. Most of the bigger pieces we put down and we put in the dump truck, ok? A lot of it goes to Rumpke. Some pieces, the smaller pieces, we just throw in the ground and actually, you were actually on one of the jobs where we piled it up, just thrown it in the ground back when we had that thing we had out there in Hyde Park. Because, you know that's what we've been doing for a long time. We would put it in the back and then we'll take it, dump it in the bucket, dump it in the dump truck, put spoils on top of it. You know what I mean and get rid of it. So that's basically what we do with it, you know what I mean?

### **Jason Fleming**

That's the way you guys been doing it from the beginning?

### **Victor McKinney**

Yeah, we just pile it up. Like, say they go in this spoils pile or either we leave it in the ground, you know what I mean? Ain't nobody ever told us how to dispose of it, you know what I mean? Nothing, just so you know.

**Jason Fleming**

So how long you been out there?

**Victor McKinney**

Since the program started.

**Jason Fleming**

You've been out there from the beginning?

**Victor McKinney**

Yep. And even NIOSH, they were here. They didn't say, you know....whatever, you know?

**Jason Fleming**

Ok, have you ever taken it to the bin down at Main Station that Cohen picks up for?

**Victor McKinney**

We put a few pieces in there before. That's about it, you know, and I think it's something in there now. But other than that, I mean we have throwed it back here and we come down here to dump it in this spoils pile down here. It just ain't never been a reason or purpose for us, I don't, not that I see of.

**Jason Fleming**

Anywhere else that it has ended up besides in the spoils or left in the ground? Those are the only two options? Or every now and then you said you have a piece that you take down to Main?

**Victor McKinney**

Yeah, that's it. We don't have nowhere else. Where else are we supposed to put it in?

**Jason Fleming**

Have you guys ever stockpiled it down at Tennyson?

**Victor McKinney**

Yeah, there's some pieces down there now. We wait. Whoever is going to the dump, we dump it in the dump truck. Put your spoils on top of it and he go to the dump.

**Jason Fleming**

On a daily basis, do you guys go to the dump every day or do you kind of leave your truck until it gets full and go a couple times a week?

**Victor McKinney**

Basically, we do go to the dump or we come down here.

**Jason Fleming**

Ok, so you guys have never stockpiled a big pile of it, like weeks worth of lead down at Tennyson and then do it all at once?

**Victor McKinney**

Maybe. Maybe a while back, you know what I mean? We don't, we ain't actually been pulling that much out because a lot of it, we've been shooting the torpedo or we get to a lot of them now, they're already copper.

**Jason Fleming**

Ok. Do you guys keep a record of which ones you actually remove, versus which ones are left in there as part of the daily log or the story that you keep at the end of the day whether or what method you've used to replace or install the new copper line? Is that part of your story? I don't know, I haven't looked...

**Victor McKinney**

No. Ain't nobody never said do nothing like that, so. No, ain't to me.

**Jason Fleming**

Ok. Is there anything else you think I need to know about this I haven't asked? Based on what we're trying to figure out?

**Victor McKinney**

What, is somebody? What are y'all trying to say, we taking this shit or something?

**Jason Fleming**

No, I mean the protocol was to put it in the bin. It hasn't been going into the bin. So, there's an inconsistency there. We're trying to figure out where it is cause if it ends up, for example, it's a hazardous waste. If we've got it all over the place, we've got to go find it and we're trying to figure out where it is so we can go find it.

**Victor McKinney**

We, like I say, most of it goes like, it goes in the dump truck and go either to Rumpke or here in the spoils pile, you know what I mean? Other than that, You know what I mean, what else are you supposed to do, you know? If somebody had told us from the beginning the right way to dispose of it, we wouldn't be going through this. But now, we're going through something that we don't have no control of because we were never told how or which way is the right way to dispose of it.

**Jason Fleming**

Yeah.

**Victor McKinney**

So what is it there for me to tell you other than what I just told you?

**Jason Fleming**

I just wanted to make sure there wasn't something else that you wanted to share with me that I didn't ask.

**Victor McKinney**

I'm just wondering why it's just now coming up after all this time though.

**Jason Fleming**

Cause we're doing the audit right now and that's why it came up.

**Victor McKinney**

Ok, I'm just telling you, it's... Basically, that's basically it, you know? Other than that, I don't know what to tell you.

**Jason Fleming**

Ok, that's fine. Jamal, you got any questions, thoughts, anything to add?

**Jamal Sterling**

No.

**Jason Fleming**

Ok, Bruce?

**Bruce Ross**

No.

**Jason Fleming**

Thank you, sir. Appreciate it.

**Victor McKinney Investigation Interview 5/21/25**

**Kevin Tidd**

I think this morning we are recording this meeting. Do you know what a Garrity warning is?

**Victor McKinney**

Say that Again.

**Kevin Tidd**

A Garrity warning. If you know what it is, I'd be surprised.

**Victor McKinney**

No.

**Kevin Tidd**

So Garrity warning, it's a big deal. It lets you know that you can be disciplined or fired based on the answers you give, but the answers cannot be used against you in a criminal court case. So I'm going to do that now. I wish to advise you that you were being questioned as part of an official investigation. You will be asked questions specifically, directly, and narrowly related to the performance of your official duties or fitness for office. You're entitled to all the rights and privileges guaranteed by the law and by the Constitution of the United States, including the right not to be compelled to incriminate yourself. I further wish to advise you that if you refuse to testify or answer questions relating to the performance of your official duties or fitness for duty, you may be subject to disciplinary action up to including dismissal. If you do answer neither your statement or any information or evidence that is gained by reason of such statement can be used against you in any subsequent criminal proceeding. However, these statements may be used against you in relation to subsequent discipline. If you could, write your name right there and then sign it. You can just write that on the same line.

**Jeremy McCleese**

Yeah, write that on the line and sign on the same line there where it says employee.

**Latisha Hazell**

And for the record Victor, my name is Latisha Hazell. I'm the HR director for the city of Cincinnati.

**Kevin Tidd**

And Victor, my name is Kevin Tidd. I'm an attorney at City of Cincinnati. As I just explained, you're here as a condition of your employment, so you need to answer these questions. But I do want to make sure that you know that what you tell me is not privileged. I'm not acting as your attorney. I'm acting as the City of Cincinnati's attorney.

**Victor McKinney**

Right.

**Kevin Tidd**

Before I get to the meat of the questions, I want to stress that it matters a great deal if the lead pipes that were here were dumped in a Rumpke sanitary landfill. Those pipes are hazardous waste and cannot be dumped at Rumpke. If that is the case, the City and its employees are implicated in federal and state crimes. Under state and federal law we have to self-report to the state and federal EPA. The disposal of lead pipes at Rumpke will trigger an investigation by state and federal authorities and that conversation is a lot different than what we have here today. You know, those are federal and state agents, you know. Here we're just here in a meeting. It's a lot different when the agents come, they're people with the guns and the badges. That being said, if these pipes were recycled and we tend to think they probably were. That's a totally different scenario and that brings the temperature in the room down a great bit. What is your position at Waterworks?

**Victor McKinney**

Maintenance Worker.

**Kevin Tidd**

So you are one of the lead crews, correct?

**Victor McKinney**

Yes, sir.

**Kevin Tidd**

Why don't you tell me just a little bit about your day-to-day? Your job duties?

**Victor McKinney**

Just go out, trace outlines, remove the lead lines and put copper pipe from the water mains to the curb.

**Kevin Tidd**

Do you know what happened to the missing lead pipes?

**Victor McKinney**

Do I know what happened?

**Kevin Tidd**

Mmm-hmm. Could you tell me?

**Victor McKinney**

Yes, well, some like you say, some we leave. We used to leave in the ground, you know what I mean, because we couldn't pull them or whatever. And sometimes, like I would give... And I'm just saying

me, I would leave it like the scrap guys, they would come past, "Hey what y'all going to do with that stuff?" And so I would just fold it up and leave it, you know what I mean, and they would come by and pick it up, you know what I mean, and I was, you know what I mean, that's what I've done, you know what I mean? But it wasn't, it was never told to me that I had to put it in a box or bring it to the yard, you know what I mean, anything like that. It was never told to me that, you know what I mean, so. I just, you know, that's what I've done.

**Kevin Tidd**

So, you've been scrapping the lead pipes?

**Victor McKinney**

Me?

**Kevin Tidd**

Somebody else. You've been giving it to somebody else, right?

**Victor McKinney**

Yes, I've just been, just like I said, I just leave it, you know what I mean, guys come past, "Hey, man, can we have that?" you know what I mean? Yeah, you know what I mean, and just fold it up and throw it up, you know what I mean?

**Kevin Tidd**

So you mean people come by, we're talking about the Tennyson location, correct?

**Victor McKinney**

Yes.

**Kevin Tidd**

So you mean like scrappers come by the Tennyson location?

**Victor McKinney**

No, no, no, no. But like, if we're on the job like, if we're on the job, just say if we work in here and the scrap guys, they always riding around in pick-up trucks picking up, scrapping stuff so. If they roll past and they see you, "Hey man, what y'all do with that stuff there?" you know?

**Kevin Tidd**

So you're saying that sometimes you would give out the lead pipes to scrappers...

**Victor McKinney**

Yep.

**Kevin Tidd**

...on the street during a job? Did you ever stockpile lead pipes at Tennyson or any other location?

**Victor McKinney**

Yes, we did. We used to put it in the back, in the back.

**Kevin Tidd**

What happened to those lead pipes?

**Victor McKinney**

Sometimes, some go to the spoils down here at Spring Grove. Sometime you don't know, most of the time we leave it. Or like I said, I did take some, you know what I mean? And used it for my, where I got in a little buying, you know what I mean, and I needed a few dollars, you know, help me out with my bill. Two of my bills. And I did take some, you know, me myself.

**Kevin Tidd**

Yeah, it's the most important aspect of this is, but you are not bringing them to Rumpke, were you?

**Victor McKinney**

No, we took some to Rumpke a long time ago, but it's been a long time ago.

**Kevin Tidd**

Do you mean the spoils though, right?

**Victor McKinney**

Yes.

**Kevin Tidd**

Like that's different than...

**Victor McKinney**

Yes.

**Kevin Tidd**

Yeah, that's different, yeah.

**Victor McKinney**

Yes.

**Kevin Tidd**

So, how many times do you think...How long have you been recycling the lead?

**Victor McKinney**

Me, myself, I haven't been recycling it that long. I just got some...

**Kevin Tidd**

Hey sorry, scrapping the lead. I'll say scrapping.

**Victor McKinney**

OK. Leaving it for somebody. I would leave it, you know what I mean? Me personally, just scrapping it myself, I did it just that one time. Did it, you know what I mean, here lately. And because I was behind.

**Kevin Tidd**

What about past years? Because we haven't had... So, our record goes back that we haven't had any lead recycling for about 5 years. So, we're trying to figure out what happened to all those lead pipes for five years.

**Victor McKinney**

That's what I said, I would leave it, you know what I mean? Then nobody...Had anybody told us that we had to put that stuff in a box or came and told us, "Hey, look. This is where we need to dispose of it." That's where it would have been at. But didn't nobody tell us that. And like I said, I have given it to them guys. You know what I mean? I'm just, I'm being honest. I have given them, you know I mean, left it for him to pick up. So, it didn't bother me. You know, one way or the other because I didn't know myself personally, that we had to put it in there. You know what I mean? Or, put it somewhere.

**Kevin Tidd**

Were you ever trained on lead pipe disposal?

**Victor McKinney**

No, Sir.

**Kevin Tidd**

What about handling lead pipes? Do you know their dangers?

**Victor McKinney**

Yeah, we know. I know it's dangerous, you know what I mean? It's not...let me see. How can you say? I know. How can you say that? I know it's dangerous, but I didn't know you couldn't give it to somebody to recycle like that. I'll put it like that.

**Kevin Tidd**

Sure, I understand. I imagine you thought of, "Hey, this is like garbage. The City is getting rid of it. I don't see anything wrong with it." I assume that's kind of what you were thinking.

**Victor McKinney**

Yes. I just say, I'm just being honest, that's what I would do.

**Kevin Tidd**

Yeah. And you know what, that's what I want from you.

**Victor McKinney**

I don't want nobody to say, I did this purposely or...you know what I mean? But I'm just telling you what I've done, so you know.

**Kevin Tidd**

Yeah. I mean, when I first heard about this, I kind of envisioned this was something where somebody thought, "Hey, the City's throwing it out," like, no harm, no foul. You know, what's the difference, right? Like, that's kind of what I thought. That that was my first thought on this. How long do you think you've been? How many? When was the first time you recycled the lead?

**Victor McKinney**

I got some this...I want you to get this clear. I have not actually, me myself personally, I did that one time. Other than that, I would give it to the scrap guys. Like I said, you know what I mean, so if you saying that's me scrapping, yes I did give it away so they're scrapping and whatever, you know what I mean? So, I did give it to them. So if that's what you call me scrapping.

**Kevin Tidd**

When you say that one time, when was that?

**Victor McKinney**

[inaudible] I don't really remember exactly. Maybe, I want to say, it was this year. I think early part of this year. I can't remember exactly what date or whatever, so.

**Kevin Tidd**

Sure. What if I told you that we have you on video, your truck being loaded and you driving away? Would that surprise you?

**Victor McKinney**

No. That's what I'm telling you. You asked me a question. I said I do not remember the exact date, ok? But I did have it in my truck and there was not no truckload, ok? That's what I'm saying. I did have that in my truck. That's what I explained.

**Kevin Tidd**

So, have you been setting it up for the scrappers like the last five years? Does that time frame make sense? That was the last time our records go back to. We haven't had any recycling. We don't have a record of recycling the lead pipes going...

**Victor McKinney**

That's what I'm saying. I would give it away, you know? That's exactly what I keep telling you. I would give it away, you know what I mean? And the guys, they pick it up, you know? And that it would be...

**Kevin Tidd**

Let me clarify my question. So did you start doing that about five years ago? I just want to make sure that time frame... I want to account for all the lead pipes, that's why.

**Victor McKinney**

Yeah, that's what I'm saying, I did. You know what I mean? That's, you know what I mean? I just been giving it away.

**Kevin Tidd**

When you would give it away, how would you do it?

**Victor McKinney**

Just fold it up, you know what I mean? Like if we be working when we get done, just fold it up, stack it up on the sidewalk. Right there the curb or something.

**Kevin Tidd**

But what about the stockpiles a Tennyson? Because I've heard a lot about stockpiles at Tennyson over the last two days.

**Victor McKinney**

We would stockpile. Yeah, we would stockpile it up there.

**Kevin Tidd**

But how did you give those away?

**Victor McKinney**

Put it in the truck. It was in the truck. That's what it was in. It wasn't a lot of lead because every time they would say something, we'd pick it up and then like I say some went to the spoils, you know or whatever, but it wasn't a lot, you know what I mean? They say, "Hey, y'all got to clean up that mess y'all got back there."

**Kevin Tidd**

But how did you give that? Did you drive? Would you put the pipes in your truck and then drive it to your scrapper or meet them somehow?

**Victor McKinney**

I just drive it and then just throw it off and then it they would get it.

**Kevin Tidd**

Where would you throw it off at?

**Victor McKinney**

It didn't like...

**Kevin Tidd**

Well, did you coordinate this with him or did you just leave it on the side of the road?

**Victor McKinney**

No, I just leave it, you know what I mean, for him, that's it. I said they asked me, "Do I have anything?" I said, "Yeah, I got some." I said, "When I dump it. I'll let you know." Just dump it off.

**Kevin Tidd**

Oh, but you were talking to them?

**Victor McKinney**

Yes.

**Kevin Tidd**

OK. I just want to make sure you weren't just dropping off lead on the side of the street.

**Victor McKinney**

No, no, I that's why I said that's what I did, you know what I mean, and that's what I've done. I take account for nothing else. So nobody else. That's what I did.

**Kevin Tidd**

That one time you recycled it, where did you recycle it at?

**Victor McKinney**

I didn't take it. I gave it to the recycle guys and they took it.

**Kevin Tidd**

But is that what you did every time?

**Victor McKinney**

What? Every time I took it and throwed it out? No, I didn't get none every time they throw, I throw it away.

**Kevin Tidd**

How many times, how often?

**Victor McKinney**

On that I just... I got that one time like I told you I was in a bind and I needed some money to help me with a couple of my bills. So, that's what I've done with it. I had it in the truck when I left out. Took it, throwed it on, piled it up, throwed it off. Went, came back.

**Kevin Tidd**

So you didn't get any money from the scrappers any other time?

**Victor McKinney**

No.

**Kevin Tidd**

That was very nice of you.

**Victor McKinney**

It's not. I don't, you know what I mean, I don't want you to think that I'm trying to tell you a lie or something, but I'm telling you what I done, OK? They asked for it. I'd give it to him and it was no specific thing saying that I had to put it in, to bring it back, or anything like that. If I was scrapping and somebody gave it to me, I would be glad, you know what I mean? And that's what happened, you know what I mean?

**Kevin Tidd**

Do you know the names of the people you were giving the lead pipes to?

**Victor McKinney**

No, they just scrap guys, you know what I mean? I didn't ask nobody no names.

**Kevin Tidd**

How did you contact him?

**Victor McKinney**

I didn't. I just like I say, the scrap guys ride around all the time. They ride all the time, day and night, and I know in your neighborhood you probably got guys that ride through your neighborhood picking up scrap. And that's what they do.

**Kevin Tidd**

Did they ever tell you where they were recycling the lead at?

**Victor McKinney**

No.

**Kevin Tidd**

Do you have any guesses on where they could have been recycling it?

**Victor McKinney**

Scrap yards, you know what I mean? I guess I don't know which one. I'm just saying, you know what I mean. I know they go to scrap yard with it.

**Kevin Tidd**

Have you since been putting the lead pipes in the lead bin?

**Victor McKinney**

Yes, since they told us where we had to put them at, when we were, yes, we have.

**Kevin Tidd**

So you didn't know that bin existed?

**Victor McKinney**

No, we did not know. Have not one time since I've been down there had anybody said it was a lead bin to put lead in. They have never said to take lead to no certain place, or put it no certain place, or nothing else.

**Kevin Tidd**

So I understand that you're scrapping it. What would you have done had you not been scrapping it? How do you think you would have dispose of the lead?

**Victor McKinney**

If they had told me to put it in a box or something or wherever, that's where it went to.

**Kevin Tidd**

What do you think would have been done with the lead had you not scrapped it?

**Victor McKinney**

I don't know what they've done with it.

**Kevin Tidd**

So the first time somebody asked you to dispose of the lead, did they give you any direction on how to do that?

**Victor McKinney**

Did nobody give us?... They just say it from now on put it in the lead dumpster. It's a lead dumpster down there.

**Kevin Tidd**

Oh, sorry, let me clarify myself, I meant from before, you know, five years ago, when you started scrapping the lead. Did anybody give you any direction on how to dispose of it?

**Victor McKinney**

No, we have never been told anything. We have never been trained on getting it, throwing it away or any that of disposing of it. They have never told us anything like that. Where to put it at or anything.

**Kevin Tidd**

Did your supervisors know that you were scrapping the lead? Did anybody know?

**Victor McKinney**

That I was scrapping? No.

**Kevin Tidd**

Was it just kind of a nobody wanted to ask?

**Victor McKinney**

Must've been nobody asked, you know what I mean?

**Kevin Tidd**

Did any of your supervisors ever ask you how you were disposing of the lead?

**Victor McKinney**

No.

**Kevin Tidd**

Were any of them coming down and checking and supervising you and seeing what you were doing?  
Who's been your supervisor in the last couple of years?

**Victor McKinney**

Gregg Beasley for the last couple of years.

**Kevin Tidd**

Was he in the yard very often?

**Victor McKinney**

The office.

**Kevin Tidd**

Did he come to the worksite very often?

**Victor McKinney**

Yeah [inaudible].

**Kevin Tidd**

But he never asked you where the lead was going, what anybody was doing with it?

**Victor McKinney**

He was on the side. I guess he's on the same page we were, you know what I mean? It was never... Nobody told us anything so.

**Kevin Tidd**

Do you remember a couple months ago when you when you did take a truckload of lead pipes and when you were looking for the scrapper?

**Victor McKinney**

Wait a minute. Let me stop you for one second. You keep saying a truckload, it was not a truckload, Ok? You know I mean? You keep saying truckload. It was not a truckload.

**Jason Fleming**

It was not a full truckload, but it was probably the contents of a full front bucket of a backhoe. Does that sound better?

**Victor McKinney**

OK.

**Kevin Tidd**

Yeah, that's fair.

**Victor McKinney**

OK.

**Kevin Tidd**

How about I change it to pipes in a truck?

**Victor McKinney**

You know, I don't want you to say...

**Kevin Tidd**

It wasn't a full truck, yeah.

**Victor McKinney**

I took more than what you wanted, you know what I mean?

**Kevin Tidd**

What did you do that day? Like, where did you drive around to? Do you remember?

**Victor McKinney**

I just drove it and dumped it off, to throw it off, and came back.

**Kevin Tidd**

Well...so the cameras show that you were gone for about two hours. So, I was just trying to figure out what you were doing during that two hour period. Where you just driving around looking for the scrappers?

**Victor McKinney**

No. Actually, no, I didn't. I just threw it off and I went to White Castle, grabbed me a coffee.

**Kevin Tidd**

That's good coffee.

**Victor McKinney**

I don't remember what else I did. I apologize, I don't know.

**Kevin Tidd**

I can't fault you for White Castle. That is my favorite coffee.

**Victor McKinney**

But anyway, that's, you know what I mean, that's what I've done. I know I did...like I said, I did throw it off for them guys to get. And you know what I mean, for my mishaps, so. I did go to White Castle that day. I know that.

**Kevin Tidd**

So when you would meet the scrappers just on a typical day, if there was like a stockpile at Tennyson, would you, like walk me through how would you do it? Would you load the truck? Would other people help you load the truck?

**Victor McKinney**

No, no, no. I just throw it up on the truck, you know what I mean? Where we have it, a little bit be on the ground or whatever and throw it on the truck and dump it off. That's the size of it.

**Kevin Tidd**

OK.

**Victor McKinney**

But nobody like I say, nobody help me. I've done it like I said and it's my stupidity for what I done, you know what I mean? It's something I done that I've done because of what I needed to do for myself.

**Kevin Tidd**

How many times do you think you would do that in like a month or would it just depend on?

**Victor McKinney**

If I leave it for the scrappers, I would leave it. It didn't make a difference. They every day or whatever, sometimes, sometimes not. You know, some days we didn't pull lead, you know, only because we couldn't pull it out of the ground. So you know, it's give or take, you know what I mean?

**Kevin Tidd**

Mm-hmm. The time a couple months ago when you did split the money with the scrappers. How did they contact you? How did they know to come back and give you money?

**Victor McKinney**

He didn't. He didn't come back and give it to me, gave it to me then, you know what I mean? Like I said, I dumped it off. I told you what happened? I told it all, you know what I mean?

**Kevin Tidd**

Well, that makes a lot more sense to me. So, they paid you up front rather than after the scrapper recycled the metal. That makes that makes more sense. Jason, do you have any questions?

**Jason Fleming**

Yep. So, I'm going to describe a situation. All we really need is for you to answer with is correct or incorrect. On April 10<sup>th</sup>, there was a pile of lead in front of the backhoes at Tennyson, probably somewhere between 30 to 40 pieces. On that day, those pieces were lowered into a front bucket of a backhoe by you, Frank Asic, Derric Brazile, the rest of your crew. That lead was put in the back of your dump truck. Not a full truckload, but enough to probably cover the bottom of the bed and the following morning on Friday, around 7:45, you left with that truck and were gone. Is that this situation that you're describing when you scrap the lead and got money for it?

**Victor McKinney**

I do...

**Jason Fleming**

Do you remember that day when you guys all went out there on Thursday afternoon, lowered in the front of Donta's backhoe, and then the backhoe dumped it in your dump truck? You parked it overnight and in the morning you left with it.

**Victor McKinney**

I want to say, yeah. Because I think that's the day. I think that was on a Friday. I think we was hauling, they was hauling it over that day.

**Jason Fleming**

Correct.

**Victor McKinney**

Yes. Yeah, I did because they didn't know what I've done with. So, you know, they didn't know what I've done with it that day.

**Jason Fleming**

Do you recall on that day when you left Friday exactly where you left the lead for the scrappers?

**Victor McKinney**

Actually, I throwed it all down by, what's the name of that street? I throwed it off downtown. I don't remember exactly which street. I throwed it off down there.

**Jason Fleming**

And then in that case, you give them a phone call and let them know it's there to come pick up?

**Victor McKinney**

Yes.

**Jason Fleming**

You don't recall the name of the company or the individual that picked it up?

**Victor McKinney**

No, the guy, his name is John. I don't know nothing else. That's all I know about it, but.

**Jason Fleming**

And do you know where it? Which scrap yard?

**Victor McKinney**

No. I know they got scrap out of it, you know what I mean? I don't know which scrap yard they take it to.

**Jason Fleming**

Approximately how much money did you get from them?

**Victor McKinney**

Three something I think it was.

**Jason Fleming**

300?

**Victor McKinney**

Yeah.

**Kevin Tidd**

You have his phone number?

**Victor McKinney**

No, I don't have it on me. It used to sit on a card, back of a piece of paper that I got.

**Kevin Tidd**

You didn't have it saved in a phone?

**Victor McKinney**

No. Like I say, most of the time, if I did do it, I leave it for them guys to pick up. Like I said, this time I've done it. It's because I needed it, you know what I mean, to help me out with two of my bills. That's why I've done it. That's why I sold it. Other than that, I just leave it on the side. Them guys will pick it up.

**Kevin Tidd**

But if you knew you could sell it, why didn't you sell it the other times?

**Victor McKinney**

Because I didn't... I was in a bind like I said, and I needed the money to keep from losing my apartment and my car. So, I sold some of it. Other than that, I didn't, you know what I mean, it didn't even bother me at first, you know what I mean? That's how it come about, you know what I mean? I thought about, I know I could get me a few dollars and pay now catch my bills up. So, that's what happened.

**Kevin Tidd**

But I mean, you been doing it for a couple of years and you knew they were recycling it. Why didn't you ask for money previously?

**Victor McKinney**

It was nothing to amount to. I mean a couple pieces here and there, you know what I mean? I would leave it for them, you know, so.

**Kevin Tidd**

Did they ever tell you how much money?

**Victor McKinney**

No. I never see them out there. I didn't go chasing nobody, you know, I mean looking for them. They came by and picked it up. They picked it up most of the time or leave it like I say when we got done with the job. Leave it stacked up and we'll be gone you know, so.

**Kevin Tidd**

Jason, how much lead was it estimated that went missing?

**Jason Fleming**

I mean if every piece was pulled out of the ground which no, it wasn't. But based on that, just looking at the numbers and the average length, it's about 100,000 lbs.

**Victor McKinney**

Where you going to get that at?

**Kevin Tidd**

I know a lot of it was left in the ground. Any other follow ups Jason or Latisha?

**Jason Fleming**

Was there anything else that you think that we need to know that we haven't asked you that you want to share with us?

**Victor McKinney**

You know, I just told you the truth. That's what I've done, you know what I mean? I'm just telling you the truth what I did. I did take it, and that's all I can tell you is I'm just being truthful with, you know what I mean? I did take it. And that's what happened, so.

**Jason Fleming**

OK, I don't have any other questions. I don't.

**Kevin Tidd**

I don't either. Thanks for coming in, Victor. I appreciate it.

**Jason Fleming**

Thank you.

**Gregg Beasley Investigation Interview 5/2/2025**

**Jason Fleming**

So, the first question is, can you describe the process for disposal during the level service lines?

**Gregg Beasley**

I explained to them that either they leave it in hole or they dispose of it on the truck and take it to the landfill.

**Jason Fleming**

Which truck? Like a dump truck?

**Gregg Beasley**

Yeah, a dump truck.

**Jason Fleming**

Which landfill would it would they be taking it to?

**Gregg Beasley**

The one we go to Rumpke or the yard.

**Jason Fleming**

The yard being CPC?

**Gregg Beasley**

Well, yeah, yeah, yeah.

**Jason Fleming**

Is there a distinction between when you guys would leave it in the hole versus when you would dispose of it?

**Gregg Beasley**

It depends on how big the piece is.

**Jason Fleming**

So larger pieces end up in the landfill or in the hole?

**Gregg Beasley**

Landfill.

**Jason Fleming**

Is it ever put in any of the other dumpsters at Waterworks or Tennyson or Main Station?

**Gregg Beasley**

We don't have a dumpster down in Tennyson and on occasion they may dump it at the Main Station, but I don't, you know, like I said, I don't keep up with that. If somebody calls which they have in the past, calls and says, hey, we need a piece of lead for display whatever you know, I'll go out there and get a piece for them.

**Jason Fleming**

Are you aware of a SOP, standard protocol or anything as far as what we're supposed to be doing with the lead and if there is one?

**Gregg Beasley**

No, nuh-uh.

**Jason Fleming**

You know which locations that we replaced that were left in the ground versus which ones...?

**Gregg Beasley**

No, I don't keep up with that.

**Jason Fleming**

Who would know that?

**Gregg Beasley**

I don't know unless you go back over all the jobs. We just leave it there I mean, that's, I guess, all the jobs we've done had, so.

**Jason Fleming**

I assume you guys have a record of all the jobs that you've been to, the location and details?

**Gregg Beasley**

Yeah, that's in Maximo.

**Jason Fleming**

Were the lead lines ever put in any non-recyclable or metal bins with the waterworks or anywhere else?

**Gregg Beasley**

I really can't answer these questions because like I said, when they dig it up, they leave it hole or take it to Rumpke. As far as that part, that's all I know.

**Jason Fleming**

When they would dig it up and leave it in the hole, was it typically in the street side or on the curb box side?

**Gregg Beasley**

Yeah, on the main side.

**Jason Fleming**

Would the crew leaders then or staff that are actually doing that I assume then since you're not able to answer those questions, you don't know if they would be the ones that we need to talk to next about specific locations and what they did with them?

**Gregg Beasley**

Yeah, you probably be better served there.

**Jason Fleming**

OK. I don't think I have any other questions. Do you think of anything else?

**Gregg Beasley**

I guess what I want to ask too is, what's prompting this? I mean, what is it? What happened? Kappers sends me an e-mail and he had asked me what did we do. And so he's telling me that there's a box down at the Main Station and that's where we need to dump it. So I said, from this point, I'll make sure the guys dump it in there since that's the issue. Now, the investigation piece is where I'm having my issues, just trying to figure why we're investigating it.

**Jason Fleming**

The City is doing an audit of the program. They do internal audit and will pick different work processes each year to do an audit and its separate from the Waterworks. And they're getting in every single detail of that.

**Gregg Beasley**

So the audit department's doing that?

**Jason Fleming**

Internal audits doing an audit of the lead replacement program. One of the questions they asked the standard protocols and procedures on the disposal of the waste.

**Gregg Beasley**

Internal audit?

**Jason Fleming**

Mmm-hmm.

**Gregg Beasley**

So, internal audit from the City. Ok, I just wanted to make sure what that was.

**Jason Fleming**

Then so as a result of that, it came to our attention that they are not in the recycle bins. It's a hazardous waste.

**Gregg Beasley**

Yeah.

**Jason Fleming**

So, Risk Management, City laws, there's concerns now about our liability and the chain of custody with hazardous waste and what that might mean. And what we're going to need to do to remediate it.

**Gregg Beasley**

That's going to be a long process that's been going on since what, the program got started?

**Jason Fleming**

Yeah, that's why we're doing the investigation to try to figure out where it has ended up. So based on that, do you have anything else?

**Gregg Beasley**

No, nuh-uh. Now after he hit pause on that, I know he's supposed to have an investigation thing going, you got any more information about that?

**Bruce Ross**

You and me?

**Gregg Beasley**

Yeah. You ain't got no more information?

**Bruce Ross**

Can you help me understand...is it related to this or something different?

**Gregg Beasley**

Something different.

**Bruce Ross**

OK. No, I'm not 100% sure. I'm not privy to all the conversations, but I'm available all day upstairs if you want to go over something.

**Gregg Beasley**

No, that's alright. I just thought you may have gotten it cause it came up in the last couple of weeks. It should be kind of fresh. But if not, that means probably no.

**Bruce Ross**

Yeah. So are we talk about the hiring process for the lead supervisor?

**Gregg Beasley**

Yeah.

**Bruce Ross**

OK. Yeah. I've been asked to look at the exam process and just see, how that's gone. That's what I've been asked to do but that is my only involvement in it.

**Gregg Beasley**

Have you gotten a start on that?

**Bruce Ross**

Yeah, I'm working on that. That should be done soon. Just to go back to this real quick, you said you sent an email or Kevin Kappers sent you an e-mail and asked you some questions and you responded to him? Is that the e-mail...?

**Gregg Beasley**

Along with Rico, yeah.

**Bruce Ross**

OK. Are there any other emails or is it just that response to them?

**Gregg Beasley**

Yeah, a response e-mail.

**Bruce Ross**

OK. No other questions.

**Jason Fleming**

Josh?

**Josh Hawkins**

As of right now, this is just information gathering, right?

**Jason Fleming**

Correct.

**Josh Hawkins**

I just have a question, sorry what was your name because I didn't get that?

**Gregg Beasley**

Wow, that's easy. Beasley, Gregg.

**Josh Hawkins**

OK.

**Gregg Beasley**

Yeah, let me let me get yours too.

**Josh Hawkins**

And then if you need anything else, I'm down in the storeroom.

**Gregg Beasley**

Are you you here?

**Josh Hawkins**

Yeah, I'm down the storeroom with Rio and David.

**Gregg Beasley**

OK. So you just started?

**Josh Hawkins**

No, I've been here for three years.

**Gregg Beasley**

How long in the storeroom?

**Josh Hawkins**

They moved me down there like a year ago.

**Gregg Beasley**

OK, I don't know why I don't run into you. I come down there all the time.

**Josh Hawkins**

I just hide in my office all the time.

**Gregg Beasley**

What's your name again?

**Josh Hawkins**

Josh Hawkins

**Gregg Beasley**

And you're a trustee, right?

**Josh Hawkins**

Yeah.

**Gregg Beasley**

So let me ask you, who acts as steward?

**Josh Hawkins**

I don't think we have...

**Gregg Beasley**

They keep sending trustees out and you don't have stewards?

**Josh Hawkins**

Yeah, we just have the executive board. So there's like, I think like 7 or 8 of us.

**Gregg Beasley**

So any event this goes, you know, because they do investigations that might lead into something else, but who deals with that?

**Josh Hawkins**

So I would and then we have our legal rep Robb Stokar. So if he has to get involved like he'll be attending.

**Gregg Beasley**

You would recommend him?

**Josh Hawkins**

I got to talk to the rest of the board, like the president, and let them know like, what's going on because again, I didn't know any of this until we walked in.

**Gregg Beasley**

What's going on here?

**Josh Hawkins**

Of. This until we walked in.

**Jason Fleming**

Yeah, it's moving real quick because there's legal timeframes that we need to deal with.

**Gregg Beasley**

They keep you busy don't they, Bruce?

**Bruce Ross**

Yeah. I'll definitely get you a copy of this recording today. I'll e-mail it to you.

**Gregg Beasley**

Is that it then?

**Jason Fleming**

Yeah, I think so. I don't have any more questions. Actually one more, sorry. What's the status of your crew today because I may need to call them in?

**Gregg Beasley**

We're up there at Clifton. There's like a graduation going on at Euclid, putting in new lines.

**Jason Fleming**

In Clifton?

**Gregg Beasley**

Yeah, we're trying to get these cars moved, but we had an issue with the posted no parking yesterday and all that, so trying to make the best of it.

**Jason Fleming**

All right, I'll communicate directly with you if I need them to come in and they'll end up having to reschedule or whatever.

**Gregg Beasley**

Yeah, yeah. Hopefully be wrapping up in a little while.

**Jason Fleming**

OK. Find out where they're at when they're gonna be done and maybe shoot me a note. Let me know so that if we do need to bring them in and chat with them and make sure it happens. I don't want to keep them late. OK, thanks.

**Gregg Beasley**

Alright.

**Gregg Beasley Interview 5/21/25**

**Gregg Beasley**

....just briefly explain it to me.

**Kevin Tidd**

Sure. So it's a big deal. And that's one of the reasons I'm gonna read it to you and I'll let you read it over, but it's a big deal. So it says that you can be, basically says you'd be disciplined or fired on the answers you give and that the answers cannot be used against you in any future criminal court case.

**Gregg Beasley**

Let me let me get your name.

**Kevin Tidd**

Sure. Kevin Tidd.

**Gregg Beasley**

How do you spell your last name?

**Kevin Tidd**

T-i-d-d. So, I'm in the City's Law department. I am the Chief Counsel for land use and infrastructure.

**Gregg Beasley**

Alright.

**Kevin Tidd**

Alright, so I'm going to administer the Garrity warning now. I wish you advise you that you are being questioned as part of an official investigation. You'll be asked questions specifically, directly, and narrowly related to the performance of your official duties or fitness for office. You are entitled to all the rights and privileges guaranteed by the law and by the Constitution of the United States including the right not to be compelled to incriminate yourself. I further wish to advise you that if you refuse to testify or answer questions relating to the performance of your official duties or fitness for duty, you may be subject to disciplinary action, up to and including dismissal. If you do not answer, neither your statement nor any information or evidence that is gained by reason of such statement can be used against you in any subsequent criminal proceedings. However, these statements may be used against you in relation to subsequent discipline. So here, won't you take a Look?

**Gregg Beasley**

Alright. I'll get a copy of that too?

**Kevin Tidd**

Yeah.

**Gregg Beasley**

Alright.

**Kevin Tidd**

Yeah. There you go. Third line. please feel free to look it over. So as I just explained, you're here as a condition of your employment. So you need to answer my questions. What you tell me, however, is not privileged. I'm not acting as your attorney. I'm the City's attorney. So before we get into this, I just want to stress that matters a great deal if the lead pipes that we're here for were dumped at the Rumpke sanitary landfill. Those pipes are hazardous waste and cannot be dumped at Rumpke. If that is the case, the City and its employees are implicated in federal and state crimes under state and federal law, The City has a duty to self-report to the Ohio EPA and the federal EPA about the disposal of the lead pipes. The disposal of lead pipes at the Rumpke dump, if that is what happened, that will trigger an investigation by state and federal authorities. These law enforcement agents will come here with guns and badges, investigate and they will interrogate you and everybody else. That is much different than what we're doing right now. I don't have a gun. I don't have a badge. And although I'm an attorney for the City, I'm not a law enforcement official. So on the other hand, if the lead was actually recycled, there's likely not a federal crime committed here. How long have you worked for the City?

**Gregg Beasley**

It will be 33 years in August.

**Kevin Tidd**

How long have you worked on the lead crew?

**Gregg Beasley**

Started in 2000, I mean 2020 rather.

**Kevin Tidd**

Have you always been on the lead crew?

**Gregg Beasley**

No.

**Kevin Tidd**

What other positions have you held?

**Gregg Beasley**

Just MEO1.

**Kevin Tidd**

So what is your current position?

**Gregg Beasley**

I'm an Assistant Supervisor.

**Kevin Tidd**

Just tell me a little bit about your job duties.

**Gregg Beasley**

Currently, or?

**Kevin Tidd**

Currently, sorry currently.

**Gregg Beasley**

Currently I'm managing crews daily.

**Kevin Tidd**

So what's a typical day? Let's say it's sunny out, no adverse weather. What is a typical day like for you?

**Gregg Beasley**

Get a work assignment from the planner. From that point that I go out and monitor the job, make sure it's complete.

**Kevin Tidd**

So when you say job, what are you monitoring? What types of jobs?

**Gregg Beasley**

Main line leaks, valves, whatever is assigned that day.

**Kevin Tidd**

So does that include lead line replacements?

**Gregg Beasley**

Not currently, no.

**Kevin Tidd**

Did you used to?

**Gregg Beasley**

The job I had prior to where I'm at now I did, yeah.

**Kevin Tidd**

And how long did you have that position for?

**Gregg Beasley**

Up until May. From 2020 to May.

**Kevin Tidd**

So you had it from 2020 until just recently? So about five years?

**Gregg Beasley**

Yeah, five years would be in September or October.

**Kevin Tidd**

So when you had that position, what were your job duties then?

**Gregg Beasley**

Speaking with the contractor, getting the lines removed replaced, and basically deal with the contract, getting the lines replaced.

**Kevin Tidd**

Did you deal with the City crews that were replacing the lead lines?

**Gregg Beasley**

Yeah, I had two crews.

**Kevin Tidd**

OK. So are you aware of the process to remove lead, a lead service line?

**Gregg Beasley**

Now when you say the process, as far as, what part of the process are you referring to?

**Kevin Tidd**

Why don't we start with the removal of the lead line from the public section? So we have a crew out there, you know...

**Gregg Beasley**

They tap. They go to the main, find out where the line led, scale back to the curb stop and remove the line.

**Kevin Tidd**

Where's the line go?

**Gregg Beasley**

The line, they'll either leave it in the hole, put in the dump truck and send it out to the dump areas.

**Kevin Tidd**

So goes directly from the hole to the dump truck?

**Gregg Beasley**

Yeah, or sometimes it's been left in the hole.

**Kevin Tidd**

Yeah, I know sometimes you can't get it out.

**Gregg Beasley**

Well, no, no. Sometimes it's left in there, depending on how much, cause lead is twisted up in there and sometimes we just leave it in there.

**Kevin Tidd**

How often is... are the lead lines cut up into pieces?

**Gregg Beasley**

Sometimes they are, yeah. From the times that I've seen out there and observed, yeah.

**Kevin Tidd**

Are they typically put in a bucket or are they put in a dump truck?

**Gregg Beasley**

If they don't leave them in the hole, they'll take them out, put them in the bucket and stick it in the back of a dump truck.

**Kevin Tidd**

So do they drop? Does it go from the bucket to the dump truck?

**Gregg Beasley**

Yeah.

**Kevin Tidd**

Ok. And then they'll leave. Then what happens next?

**Gregg Beasley**

Well then they'll take it to wherever they dump it at, depending on if it's out here at CPC or at the landfill, Rumpke.

**Kevin Tidd**

Were you ever trained on the proper method for the disposal of lead pipes?

**Gregg Beasley**

No.

**Kevin Tidd**

Were you aware of the lead pipe bin?

**Gregg Beasley**

No. As of a couple of weeks ago, Richard Luckey, the guy you interviewed earlier, had put out an e-mail saying that there's a container down there at Eastern Avenue that they supposed to have it in there. Now, from when the crews get it from the ground to get it to the bin, I have no idea where it goes from that point because I don't monitor that part.

**Kevin Tidd**

So nobody's ever mentioned the lead line bin to you before most recently?

**Gregg Beasley**

Most recently, like I said, I got the e-mail and they have told me, you know what's your procedure from [inaudible]? I have gotten emails that's asked, "What's your procedure?" I said either the crews take it from there, take it to the dumpster. If it's that one or here and it gets sent out.

**Kevin Tidd**

So you're telling me they either take it back to a Waterworks facility or they take it directly to Rumpke?

**Gregg Beasley**

Right.

**Kevin Tidd**

And how many times do you think you've done that?

**Gregg Beasley**

What do you mean?

**Kevin Tidd**

Taking it directly to Rumpke.

**Robb Stokar**

I don't know if he said he took it to Rumpke.

**Kevin Tidd**

Who's your crew? Your crew or you?

**Gregg Beasley**

The crew. I don't take it. I don't have no dealings with it.

**Kevin Tidd**

Sure.

**Gregg Beasley**

After it, because typically what happens in the day, once I set the work up, they go out there and they remove the lines. Now from where it goes from that point, I don't keep up with that.

**Kevin Tidd**

Aren't you the supervisor though?

**Gregg Beasley**

Yeah.

**Kevin Tidd**

You weren't worried about where they were disposing of the lead lines?

**Gregg Beasley**

They would tell me they leave for the hole because... Prior to me being in this position, that's what I was explained from Clay Hissett. You can leave it in the hole, put in the dumpster and send it out. So from that point, I thought that was normal because you know, like I said, I've been doing this five years. So if anything was different, I should have been made aware of a while back and I wasn't.

**Kevin Tidd**

So you were actually telling them to bring it back to...

**Gregg Beasley**

No I wasn't telling no one to bring nothing back.

**Kevin Tidd**

So, what did you tell them? How did you explain how to dispose of it?

**Gregg Beasley**

I didn't explain to those because they were there before I got there. They've been there way... When this program got started back in 17 or 18, this is what normally they was doing. So, I figured that's what it was. So, I didn't come in here and change the way we do things. They've been doing it since whenever this lead program got started. This is the way they always done it. A lot of these guys are currently down there and presently down there, this is what they did. So, I'm assuming that this is what was the normal procedure. I don't have no, I have no reason to think anything. Now from time to time Jason will call or somebody will call and say, "Can you give me a piece of lead?", so that we can display it or show it, ok? That's when I would go out there and get a piece to get to somebody to display. But anything beyond that, I have no control over it. I'm just going based on what has been. So I had no reason to change what they've been doing because prior to me there was a guy doing it prior to me, so that was the normal procedure.

**Kevin Tidd**

Did you receive any trainings on lead?

**Gregg Beasley**

Training? What aspect?

**Kevin Tidd**

Any type of trainings about I guess the dangers of lead or the disposal of lead?

**Gregg Beasley**

No, nuh-uh, nah. The only thing we would get, they have a yearly training where they do blood tests. I will set that up with the safety guy, they'd go get evaluated and see if they had high levels and that was it.

**Kevin Tidd**

So as a supervisor, when you visited a site, what would you do if you saw somebody handling lead without gloves on?

**Gregg Beasley**

They would always have gloves on. They didn't operate like that because that affects their blood level. They wouldn't touch it.

**Kevin Tidd**

So you're aware of the dangers of lead?

**Gregg Beasley**

So, I'm aware of the dangers of lead. Well, yeah, through Safety, explaining that, you know, it could potentially cause inflated blood level.

**Kevin Tidd**

Sure. And you were unaware of the lead dumpster?

**Gregg Beasley**

Yes.

**Kevin Tidd**

You know, we have cameras at all the Waterworks facilities?

**Gregg Beasley**

Yeah, yep.

**Kevin Tidd**

Do you remember receiving an e-mail from Rico Cosby about a mountain of lead sitting at the Tennyson station and you were asked to retrieve it and put it in the lead dumpster? You said you would handle it.

**Gregg Beasley**

I may have told the crew to go handle it and get rid of it and that's as far as I would go because I don't have no actual hands on with the lead. If he calls me and says, "Hey, I need you to go take care of this," I said, "OK, I'll handle it." That's just my expression. If you ask me to take care of another particular situation, I'll dispatch the crew, they'll take care of that because I'm not aware that there was a pile of lead sitting over there. Now if he calls me, same goes with, if he contacts me and says, "Jason wants a piece of lead," I'll go ahead and grab a piece, here you go. It was that simple. I'm not, that's just what it was.

**Kevin Tidd**

You weren't curious what the lead dumpster was when he asked you to throw it in the lead dumpster?

**Gregg Beasley**

Was I curious? No, because they've been doing it like this for years. I mean, they know what to do with the lead to get rid of it. I wouldn't have no reason to be curious unless now. As of now, it rises to that level, but back then there was this normal procedure.

**Kevin Tidd**

So you didn't acknowledge that you were going to put it in the lead dumpster?

**Gregg Beasley**

What you mean, "acknowledged?"

**Kevin Tidd**

In the e-mail chain.

**Gregg Beasley**

That I was going to put it..? I said it was handled. So, if it was handled, my team was going to go get it and handle it and put it where it needs to go. If it needs to go in the dumpster or whether you take it and send it somewhere else, it was handled. That's my definition of being handled.

**Robb Stokar**

It sounds like you're asking about a specific e-mail. Do you want to show them a copy of it?

**Kevin Tidd**

Sure I can. Here it is here. You can take a look. You can take a look too.

**Gregg Beasley**

OK, let me see.

**Robb Stokar**

From Rico to Gregg.

**Gregg Beasley**

That's typically what, I mean...

**Robb Stokar**

Hold on. But that was from Rico to you. And then is there a response? I don't want to touch your computer.

**Kevin Tidd**

Your're good.

**Robb Stokar**

What was the date on that?

**Kevin Tidd**

It was October 9th, 2024. And he said exactly what he said.

**Robb Stokar**

Then October 9th, I will take care of it. OK.

**Kevin Tidd**

It's actually pretty impressive. You remember exactly what you said.

**Gregg Beasley**

No, well, no.

**Kevin Tidd**

That's exactly what you said.

**Gregg Beasley**

That's what I told...I said it with everything. Because and let me give you a little background. OK, just so you be clear on the way I am. If I work for you and you called me and asked me, even with Jason to get something done, just take care of this and handle it. Because that's all you want to know. Is it handled? So that's the way I operate. It's handled. "Hey, we need to get that lead from down there, needs to be moved." Handled. On the response to the e-mail. Whether it's a phone call or whether it's an email, that's just the way I do it. I'm not sitting there micromanaging my team. I don't do that. We have a beautiful relationship down there with the team. We take care of each other. So, I'm assuming you guys take care of that, handle it under normal circumstances like we do when we take something out the ground or whatever.

**Kevin Tidd**

Was it normal practice to stockpile lead at Tennyson or other Waterworks facilities?

**Gregg Beasley**

I don't know nothing about that stockpile. I just knew that, you know, and I wasn't monitoring that. I wouldn't go down there because where my office is located at I don't have no reason to go down there to look at and monitor that stuff.

**Kevin Tidd**

So what exactly did you do when you supervised these crews?

**Gregg Beasley**

My responsibilities. In the course of, I said I worked for two or three weeks in advance, ok? Undergrounds, getting with the contractors, seeing what's going on far as what I need to order and get whatever. I mean, office stuff and it was down and let me explain this... In addition to that, I don't have a planner, ok? Because under these current circumstances, there is a planner up there to help them facilitate a part of that process. This is one of the reasons why I was kind of upset because I didn't get the job because they have two people doing it. I'm doing this all by myself with less money, alright? And I'm handling it. So, whatever he asked me to do, I was handling it. So I'm not running from the fact that I wasn't doing it. I did everything he needed, whatever needs to be done down there to assure that the job got done. That that was my role. I didn't even have a vehicle to use. I was told I can't take my vehicle home, alright? I'm volunteering information, but I would take my car to go to job sites to flag for my team to make sure that it was handled. Make sure that it was taken care of, that's what I did.

**Kevin Tidd**

But you didn't handle the disposal of the lead.

**Gregg Beasley**

I don't have no reason to handle it, because that's what they do. They get rid of that, I don't. Why would I handle it as far as disposal of it? They would dispose of it.

**Kevin Tidd**

Why do you think every time I ask somebody how the lead was disposed of I get a different answer?

**Gregg Beasley**

I couldn't answer that. Because you would have to ask them that. All I can do is give you from my supervisor's position what I was doing and that was my role and what I was doing to them and giving them that task to complete and get it done. At the end of the day, all my ledgers that I've kept completes, done, handled. Anything that was given to me outside of the scope of the program taken care of. That's just what I did. So, I'm not running around with lead or... See, they took care of it. That's what made what we had down there good. We worked as a team. And I shared it, "I'm not your boss. I'm not your supervisor. This is just my role on the team."

**Kevin Tidd**

You are the supervisor or you were the supervisor.

**Gregg Beasley**

Yeah, but this is my role on the team. This is what I do. I organize the work, make sure the stuff is executed and handled, and that's what I did.

**Kevin Tidd**

It doesn't sound like the disposal of lead pipes was organized very well.

**Gregg Beasley**

Based on the way they had did it in the past, I'm assuming that that's the way it was so that's where it's at.

**Kevin Tidd**

Have you ever seen anybody load lead pipes onto City trucks and then leave a facility?

**Gregg Beasley**

No.

**Kevin Tidd**

That's a surprise to you?

**Gregg Beasley**

What, does it surprise me? Yeah. But here's the thing, I didn't go out of my way looking for it. So if it on the curb, I don't know nothing about it.

**Kevin Tidd**

Well, you know there are cameras all over these facilities, right?

**Gregg Beasley**

Well, you explained that earlier.

**Kevin Tidd**

Yeah. So if I told you we had footage of that, that would be a surprise to you?

**Gregg Beasley**

Yeah.

**Kevin Tidd**

Do you have any idea where that truck would go, or those trucks?

**Gregg Beasley**

I couldn't tell you. You would have to talk to those individuals because once they got on those trucks, it was up to them to dispose of it.

**Kevin Tidd**

So you're telling me they typically just go straight to the landfill, or...

**Gregg Beasley**

No, I'm not telling you they typically go straight to it. They may leave it on the next day because of the spoils. So it may sit on there two or three days. But now...

**Kevin Tidd**

Waits where?

**Gregg Beasley**

At the yard.

**Kevin Tidd**

OK.

**Gregg Beasley**

OK, until they go to, go dump somewhere. But up until the end they don't... If we don't have a heavy load in that truck, it may not get dumped that day. It may get dumped two or three days later. So, I don't have no way of monitoring that.

**Kevin Tidd**

Did those guys personally dispose of it, or did a different section of Waterworks do it?

**Gregg Beasley**

When you say dispose, you talk about dump it out of the dump truck or dispose of it?

**Kevin Tidd**

Yeah, I mean like...

**Gregg Beasley**

Whoever the truck driver was.

**Kevin Tidd**

So, the truck driver would be the person who disposed of the lead line?

**Gregg Beasley**

Yeah. Whoever has that on their particular truck. Now, not so much as disposing it individually, or handles, or drops it somewhere, but disposing it as if it's in their truck, they would dump it, wherever they would dump it at.

**Kevin Tidd**

But you don't know where they dumped it at?

**Gregg Beasley**

Like I said, either dumped it here at CPC or at Rumpke. That's as far as I know.

**Kevin Tidd**

So they didn't deliver it to a different...

**Gregg Beasley**

Different where?

**Kevin Tidd**

A different section of Waterworks for them to handle it, right?

**Gregg Beasley**

I couldn't answer that. I mean, to be honest I couldn't, because like I said, they're disposing it and get rid of it. Where?... CPC, Rumpke is what I know. So anything beyond that I couldn't tell you.

**Robb Stokar**

It sounds to me like you guys may be talking about different steps of the process because as I understand it, it's job site into a truck, then potentially an intermediary site, then a final resting place. So maybe break it down that way because I got lost.

**Kevin Tidd**

Go ahead, you break it down. But I thought you said that they either go directly from the job site to Rumpke or they bring it back to a Waterworks facility.

**Gregg Beasley**

Like I said, it depends if that load is not heavy on that truck. We're down in Tennyson, alright? And a part of my conversations with them was the amount of it. We got to go all the way across town. We're down there at Anderson, East, on that side of town. We got to come all the way over to Rumpke. Now, if it's 11:30, 12:00, possibly 1:00, we got to wrap her up or we're going to be in overtime. So if it's not that full, we'd leave it in the truck. And depends on if we're doing it the next day or that day, then we'll go there, on top of what they got that particular day, then they would ship it out. But other than that, it wasn't. You know, it might fit in there two or three days.

**Kevin Tidd**

So, just in the truck not like on the ground?

**Gregg Beasley**

I don't know if it was on the ground. I just knew it was possibly in the truck.

**Kevin Tidd**

So, would they take the truck, then to Rumpke? Or did they put it in a different bin?

**Gregg Beasley**

What do you mean?

**Kevin Tidd**

Like did they dispose of the lead...

**Gregg Beasley**

I don't know. Once they enter the truck, I don't know where it went from that point in terms of whether it was at Rumpke, whether it's here, whether it was Main Station, whether it was at another dump, so I don't know, I couldn't tell you that.

**Kevin Tidd**

Yeah, I know. I wish I had the tickets. We are looking into that. So, Rumpke has a record of all the City trucks.

**Gregg Beasley**

Yeah, well we fill out a ticket. They fill out a Rumpke ticket.

**Kevin Tidd**

Yeah, I know. I'm still waiting on all those tickets, but so I assume we'll have tickets for all of those.

**Gregg Beasley**

All I can tell you is that's where they went, between those spots. So I don't know what truck or what individual had those particular lead or whatever? I can't tell you that cause I don't know that.

**Kevin Tidd**

And you don't know why other City employees would load up a truck with lead pipes and then leave for about two hours?

**Gregg Beasley**

I couldn't answer that. I have no deals with that because they do lead down here as well. So, in addition to what we do down there, Repair, Distribution does the same thing. So, I guess part of the question would be is everybody doing the same thing, which I believe they are because nobody specifically came out and told us how to get rid of lead.

**Kevin Tidd**

Do you know what the current price for recycled lead is?

**Gregg Beasley**

What?

**Kevin Tidd**

Do you know what the current price for recycled lead is?

**Gregg Beasley**

No, nah. There's no reason to know that.

**Kevin Tidd**

Jason, do you have anything else to add?

**Jason Fleming**

Going back to the e-mail and you said in the response to Rico that you'd take care of it, did you specifically instruct the crews per Rico's e-mail to dispose of the pile of lead at Tennyson in the bin at Main Station?

**Gregg Beasley**

When I say handle it, I'm gonna tell you what I did. I go down there and I say, "Hey, there's a pile down there and you need to get that pile up." Just like if I call him and I say, "Listen, the mud at Main Station needs to be moved," alright? I would tell them we need to move the mud. Now, they'll say, "OK, I'll push it maybe Tuesday, Wednesday if we get done early or not." That's how, that's what I did. I just told them what to do and they got it done and my work record reflects that because all the jobs that I've had since being down there, it's all complete. I mean, even when you came out there on some particular jobs, you know, we set them up and arranged it and it was the same procedure. I didn't deviate from the procedures. I mean, even when...

**Kevin Tidd**

Well, it sounds like you don't know what happened.

**Jason Fleming**

So back to my original question, yes or no, did you specifically tell the crews to dispose of the lead in the bin at Main Station?

**Gregg Beasley**

I didn't specifically tell him to dispose of it into the bin, no.

**Jason Fleming**

OK.

**Gregg Beasley**

I just told them, you know, it needs to get rid of.

**Jason Fleming**

You also mentioned spoils at Main Station. Is that another location that you guys stockpile spoils besides CPC or taking it to Rumpke, would you stockpile that at Main?

**Gregg Beasley**

I don't know where they would stockpile it. Let me tell you about Main Station. Main Station was used to pick up B-19 and possibly dump a little down there. That was it. Other than anything stockpiling or using it to sit there, I don't know nothing about.

**Jason Fleming**

So you never saw a pile of lead in the back corner in front of the backhoes at Tennyson station ever?

**Gregg Beasley**

Say it again?

**Jason Fleming**

You never saw a pile of lead sitting in front of where the backhoes park at the back corner of the parking lot?

**Gregg Beasley**

I've seen some pieces there, not a pile, some pieces and..

**Jason Fleming**

Approximately how many?

**Gregg Beasley**

Jason, I can't tell you how many pieces. There's a few pieces there...

**Jason Fleming**

Less than 10, more than 10?

**Gregg Beasley**

I mean, I don't know. I couldn't even give you a number on that. I mean, because here's the thing, even if you would call or somebody from here will call and say I need a piece of lead, either I would have looked down there, if there was a piece down there, I'd grab it. If there was a piece on the job, I had to go to the job site and get it.

**Jason Fleming**

I don't have any other questions.

**Kevin Tidd**

I don't either. Alright, thanks for coming in.



**Date:** August 13, 2025

**To:** Sheryl M.M. Long, City Manager

**From:** Lauren Sundararajan, CFE, Internal Audit Manager *L.S*

**Copies to:** Internal Audit Committee  
William Weber, Assistant City Manager  
Andrea E. Yang, Interim Executive Director, Greater Cincinnati Water Works

**Subject:** **Lead Service Line Replacement Program Audit**

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Attached is the Lead Service Line Replacement Program audit report. The primary objectives of this audit were to evaluate the efficiency and effectiveness of Greater Cincinnati Water Works' (GCWW) Lead Service Line Replacement Program, and to ensure compliance with all applicable legal and regulatory requirements. This audit was conducted in accordance with the current audit agenda.

We would like to thank the management and staff of GCWW for their assistance and cooperation during this audit.

If you need any further information, please contact me.

Attachment

## **Lead Service Line Replacement Program Audit**

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August 2025



Lauren Sundararajan, CFE  
Internal Audit Manager

Pamela King  
Senior Internal Auditor

Zeenat Tabaku  
Internal Auditor

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## Executive Summary

Internal Audit (IA) conducted a performance audit of Greater Cincinnati Water Works' (GCWW) Lead Service Line Replacement Program (LSLRP). The primary objectives of this audit were to evaluate the efficiency and effectiveness of GCWW's LSLRP, and to ensure compliance with all applicable legal and regulatory requirements.

The Environmental Protection Agency (EPA) established the Lead and Copper Rule (LCR) in 1991 to protect public health by reducing lead exposure in drinking water, primarily from lead pipes and brass or bronze fixtures. GCWW launched its Enhanced Lead Program in 2016, focusing on public outreach and developing an LSLRP.

The audit revealed several opportunities for strengthening internal controls over LSLRP operations. For instance, IA found that scrap metal lead pipes were not collected for recycling according to GCWW protocols. Following an internal investigation by GCWW, it was determined the pipes were misappropriated by a member of the City's in-house lead crew and sold for scrap metal value for their personal gain. As management was unaware that the pipes were not being recycled according to protocol, the crew member was able to continue misappropriating the pipes until GCWW conducted its investigation. While no violation of environmental laws was identified and the in-house lead crew was dismantled and disciplined for these actions, it is critical to ensure that the disposal of lead pipes is properly monitored if the crew is reinstated, and that management oversight and review of lead pipe removal and disposal is robust.

IA found that metrics do not exist to determine the amount and monetary value of recycled lead. The City's contract with Cohen Brothers, Inc. (Cohen) states that the City receives a portion of the money from all recycled metals, including lead. As the amount and monetary value of recycled lead was not shown on recycling invoices, those who viewed the invoices were unaware that lead should have been collected. Currently, no mechanism or metrics exist to compare the estimated weight of lead piping removed with receipts from Cohen or quantify the value of recycled lead.

IA also found that the in-house lead crew did not receive recurring training. While the in-house lead crew was trained in 2019 on all facets of working with lead pipes, this training was not repeated; additionally, according to GCWW management, there has been significant turnover of lead crew supervisors and leaders in the past five years. Regular, recurring training of the in-house lead crew is essential to ensure that all employees are compliant with all current departmental procedures.

To reduce the risks in LSLRP operations and ensure adherence to environmental regulations, IA recommends that LSLRP ensure that all lead pipes are disposed of in accordance with NIOSH hazardous material storage requirements; strengthen management oversight and communication regarding lead service line removal and disposal; create tracking and periodic reporting methods on the quantity of lead pipes removed, including the amount and monetary value of recycled lead; and institute regular, recurring training for in-house lead crew members on scrap metal pipe management procedures and ensure that documentation of completed training with employee signatures exists. Implementing these recommendations will improve the internal control system within LSLRP operations and help management achieve desired results through effective stewardship of public resources.

## I. Introduction

### Background

GCWW supplies an average of forty-three billion gallons of water annually through over 3,180 miles of mains to 240,000 customers, serving approximately 1.2 million individuals.<sup>1</sup> Lead was commonly used for service lines in the early 1900s; however, in 1928, the City mandated the installation of copper pipes. Today, some service lines still contain lead.

The EPA established the LCR in 1991 to protect public health by reducing lead exposure in drinking water, primarily from lead pipes and brass or bronze fixtures. GCWW launched its Enhanced Lead Program in 2016, focusing on public outreach and developing a LSLRP. In this early iteration of the program, citizens were responsible for paying the cost of private line replacements.

In 2019, GCWW worked with the National Institute for Occupational Safety and Health (NIOSH) to assess lead exposure risks for crews replacing lead lines and made enhancements to improve employee safety. The LSLRP had a dedicated team of eight to nine staff members. In 2021, the City assumed responsibility for restoring private and public lines at no cost, increasing participation to 50%; at this time, participation in the program has reached approximately 90%.

Lead service lines have been historically replaced either by GCWW's in-house lead crew or by contractors such as Neumann Plumbing, Adleta Construction, The Gertz Company, and Moerlein Construction Group. The in-house lead crew, which was recently dismantled and disciplined, was responsible for completing public line replacements. Following the dismantling of the crew, GCWW placed an Emergency Purchase Request for Adleta Excavating, LLC, to complete the public line replacements. Contractors are responsible for completing private line replacements and water main replacement projects, and are overseen by GCWW inspectors, who travel to worksites and ensure that contract terms are enforced. Further, the City maintains a contract with Cohen, which is responsible for recycling scrap metal including lead and returning a portion of those proceeds to the City.

Working with the University of Cincinnati School of Planning Urban Planning Program, GCWW aims to replace lead service lines equitably. Approximately 1,333 lines have been replaced from July 2024 to April 2025.<sup>2</sup> By 2037, the EPA requires all lead lines to be eliminated, necessitating a significant increase in GCWW's replacement efforts citywide.

IA was informed that funding for the LSLRP comes predominantly from Fund 312 for private side replacement work and Fund 756 for public side replacement. Multiple loans and grants have been utilized to reimburse these accounts after the work is completed. Loans and grants are typically through the Ohio EPA Drinking Water State Revolving Fund (DWSRF)<sup>3</sup>, but also through the State H2Ohio program<sup>4</sup> and the United States EPA.

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<sup>1</sup> LSLRP PowerPoint Presentation

<sup>2</sup> Branch Details Excel Document from Kevin Kappers, Dated 4/25/2025

<sup>3</sup> Drinking Water State Revolving Fund (DWSRF) | US EPA

<sup>4</sup> [H2Ohio.ohio.gov](http://H2Ohio.ohio.gov)

### **Audit Selection**

IA conducted this audit in accordance with the Audit Work Plan.

### **Audit Objectives**

The primary objectives of this performance audit were to evaluate the efficiency and effectiveness of GCWW's LSLRP, and to ensure compliance with all applicable legal and regulatory requirements.

### **Audit Scope and Methodology**

To accomplish the audit objectives, IA compared current practices to industry standards, reviewed pertinent policies and procedures, examined department contracts and records, interviewed appropriate staff, and analyzed statistics of relevant data. Records reviewed included data from Fiscal Year (FY) 2023 to present.

During the audit, environmental compliance was evaluated in relation to the management of scrap lead pipes removed from service. Under Ohio law, the IA audit qualifies as an environmental audit, which is defined as a voluntary, thorough, and discrete self-evaluation of one or more activities at one or more facilities or properties that is documented; is designed to improve compliance, or identify, correct, or prevent non-compliance, with environmental laws; and is conducted by the owner or operator. While no violation of environmental laws was identified, the audit determined the need for additional controls on the management of lead pipes removed from service.

### **Scope Limitation**

IA was unable to interview members of the in-house lead crew, as the crew had been dismantled and disciplined due to an internal GCWW investigation of improper lead pipe disposal. Remaining crew members, represented by their City union representatives, refused to speak to IA.

### **Statement of Auditing Standards**

As required by the Cincinnati Administrative Code Article II §15, this audit was conducted in accordance with the Generally Accepted Government Auditing Standards (GAGAS), except for standard 5.60 pertaining to external peer review requirements. This exception did not have a material effect on the audit.

IA continues to conduct internal quality reviews to assure conformance with applicable GAGAS. IA performed the fieldwork between April and July 2025.

### **Recommendations**

IA commends the staff of GCWW for their cooperation throughout the audit.

## II. Audit Findings and Recommendations

*Lead pipes were found to be misappropriated.*

The NIOSH Job Hazard Analysis created in 2019 states that removed lead piping must be placed in a backhoe bucket, transported to the GCWW Main Station location, and disposed of in a designated container, which Cohen is responsible for servicing. During the course of the audit, a discrepancy was identified in how lead pipes removed during LSLRP projects were being handled. As a result of IA's inquiry, an internal investigation was conducted by GCWW management and revealed that members of the in-house lead crew were removing lead pipes from job sites, stockpiling them at GCWW's Tennyson location, then loading them into a crew member's truck, at which point they were removed to an undisclosed location for that crew member's own profit.

Through GCWW's investigation, it appeared that the lead pipes were recycled; therefore, no violations related to hazardous waste or environmental laws occurred. However, although the in-house lead crew was dismantled and disciplined for these actions, it is critical to ensure that if the crew is reinstated, the disposal of lead piping is properly monitored by GCWW management.

**Recommendation 1:** Ensure that all lead pipes are disposed of in accordance with NIOSH hazardous material storage requirements.

**Department Response:** Agree. Internal Audit's efforts alongside a thorough investigation by GCWW Staff uncovered an internal employee misappropriating lead pipes after service line replacement for personal gain. GCWW immediately suspended work by internal crews during the investigation and has since rolled out a series of additional controls to ensure this does not happen again. Those controls include updated crew requirements to report on the location and quantity of lead pipe removed, updated supervisor procedures requiring weekly recycling dumpster inspections, and increased staff training. The new controls have already been implemented by GCWW- Distribution Division supervisors.

*Management oversight and communication regarding lead service line removal and disposal should be strengthened.*

Proper management oversight and communication is necessary to ensure processes are functioning as intended, errors are detected, and department objectives are carried out appropriately. IA found that management oversight and communication regarding lead service line removal and disposal should be strengthened: as mentioned above, proper protocol for disposing of lead pipes was not followed by members of the in-house lead crew. According to GCWW staff, the Cohen metal recycling container had not been serviced in approximately five years, and management was unaware that the pipes were not being recycled according to protocol. Due to this lack of oversight of lead crew operations and the Cohen container, the crew member was able to continue misappropriating the pipes until IA inquired about disposal procedures and GCWW conducted its internal investigation.

**Recommendation 2:** Strengthen management oversight and communication regarding lead service line removal and disposal.

**Department Response:** Agree. Standard operating procedures for internal GCWW crews

require use of a dumpster designated for lead service line recycling. Finding #1 of this report acknowledges that an employee was found not to be following this procedure. As mentioned in the response above, new controls have already been added to require staff to capture the location from which lead pipes were removed and the quantity removed. This data informs supervisors and enables them to provide effective oversight. Updated SOPs include tasks by supervision to verify anticipated quantities of lead are disposed of in the recycling dumpster on a weekly basis.

Additionally, recurring annual training and new employee training includes lead recycling procedures.

*Metrics do not exist to determine the amount and monetary value of recycled lead.*

The City's contract with Cohen states that the City receives a portion of the money from all recycled metals, including lead. However, the amount and monetary value of recycled lead was not shown on recycling invoices separate from other recycled metals because no lead was collected from the Main Station container. Those who viewed the recycling invoices were unaware that lead should have been collected, which allowed lead pipes to continue being misappropriated. Currently, no mechanism exists to compare the estimated weight of lead piping removed with receipts from Cohen, and metrics that include the amount and monetary value of recycled lead are not collected. A metric related to recycling profits could help to quantify the financial return from salvaging and recycling old lead pipes and associated materials. These procedures are critical in ensuring that the City can quantify the amount and monetary value of the lead removed from circulation and recycled.

**Recommendation 3:** Create tracking and periodic reporting methods on the quantity of lead pipes removed, including the amount and monetary value of recycled lead.

**Department Response:** Agree. This has already been incorporated by GCWW- Distribution Division supervisors into the SOP and work order requirements. (See responses 1 and 2)

*The in-house lead crew did not receive recurring training.*

According to GCWW management, the in-house lead crew was trained on all facets of working with lead pipes, including disposal, after the NIOSH report was released. However, this training has not been repeated, and newer members of the in-house lead crew were trained on the job by other crew members. Additionally, according to GCWW management, there has been significant turnover of lead crew supervisors and leaders in the past five years. Regular, recurring employee training is essential to ensure that all employees are aware of and compliant with all current departmental procedures.

**Recommendation 4:** Institute regular, recurring training for in-house lead crew members on scrap metal pipe management procedures and ensure that documentation of completed training with employee signatures exists.

**Department Response:** Agree. This change has already been incorporated by GCWW- Distribution Division supervisors and GCWW- Safety and Training into new employee and annual training programs. (See response 2)

*Lead pipelines that are left abandoned in the ground after replacement are not being tracked.*

When the in-house crew or contractors replace lead pipelines, the lead pipes are often left underground unless they disrupt the replacement process; no tracking mechanism exists to document where these pipes are located. While leaving the pipes underground is not a violation of the LCR, maintaining a record of abandoned lead lines may help with future infrastructure planning and maintenance and ensure that all lead piping is accounted for.

**Recommendation 5:** Maintain detailed records of all lead lines that have been left abandoned.

**Department Response:** Agree. This change has already been incorporated GCWW-Distribution Division supervisors into the SOP and work order requirements. (See responses 1 and 2)

*Contractor expectations should be redefined.*

The departmental purchase order for Moerlein Construction Group states that the contractor must schedule inspections 24 hours before replacing lead service lines.<sup>5</sup> However, IA was informed by LSLRP that the contractor has been disregarding this clause and not informing inspectors of their whereabouts. When terms of an agreement are not enforced and inspectors are not able to oversee contractors' work, regulatory compliance, health and safety, and public trust may be negatively impacted. Overall, proper oversight of contractors is crucial to ensure safety and compliance with lead service line replacements.

**Recommendation 6:** Clarify expectations with contractors.

**Department Response:** Disagree. GCWW disagrees with the implication that there has been any lapse in water service line replacement inspection or enforcement of standards that would impact health, safety, or regulatory compliance. Every lead service line replacement completed through GCWW's program has received a passing inspection, which is required before contractor payment is authorized. We believe the concern cited in this recommendation reflects a minor disagreement between inspection staff and just one of several replacement contractors.

GCWW is constantly adapting and improving its program and is in the process of increasing the number of inspection staff and has already updated the scope of work included in its agreement with contractors.

*Master agreements governing LSLRP have not been completed.*

Master agreements, or contracts that outline the terms and conditions between clients and vendors when vendors are providing multiple services, are essential to ensure that contract negotiations with the same vendor are not repetitive. Contractors such as Nieman Plumbing and Adleta Construction often undertake multiple projects on behalf of LSLRP; however, master agreements have not been developed between LSLRP and the contractors. Currently, LSLRP is working with the Procurement Department (Procurement) to develop a new Request for Quote, which will allow Procurement to handle master agreements; however, these agreements have

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<sup>5</sup> "Plumber must call GCWW at 513-591-7825 at least 24-hours prior to replacing the lead service line to schedule inspection of the new copper service line." Departmental Purchase Order, Moerlein East End PKG

not been completed.

**Recommendation 7:** Work with Procurement to complete master agreements.

**Department Response:** Disagree. The GCWW Lead Service Line Replacement Program is unique, not only to the city, but was one of the first proactive replacement programs in the Country. GCWW worked closely with the Office of Procurement, Law Department, Department of Economic Inclusion, and City leadership to establish the program and its contracting mechanisms. The established program has been working since 2018 and has resulted in over 7,500 successful lead service line replacements.

Recent regulatory changes require GCWW to accelerate the rate of lead service line replacements. To meet the requirement of replacing all lead service lines by 2037, GCWW has reached out to our colleagues in the City's Procurement and Inclusion agencies to help determine the best procurement alternatives to accelerate the rate of removal of lead service lines, increase the contracting pool, and maximize utilization of small, local, minority owned businesses. Master agreements are just one possible option under consideration. Advertising for a new one-off contracting opportunity, which may or may not involve master agreements, is expected to be released by the end of the calendar year.

### **III. Conclusion**

The audit revealed several opportunities for improvement over LSLRP operations. For example, IA found that lead pipes were misappropriated, management oversight and communication regarding lead service line removal and disposal should be strengthened, metrics do not exist to determine the amount and monetary value of recycled lead, and the in-house lead crew did not receive reoccurring training.

To improve LSLRP operations, IA recommends that LSLRP ensure all lead pipes are disposed of in accordance with NIOSH hazardous material storage requirements; strengthen management oversight and communication regarding lead service line removal and disposal; create tracking and periodic reporting methods on the quantity of lead pipes removed, including the amount and monetary value of recycled lead; and institute regular, recurring training for in-house lead crew members on scrap metal pipe management procedures and ensure that documentation of completed training with employee signatures exists. Implementing these recommendations will improve the internal control system within LSLRP operations and help management achieve desired results through effective stewardship of public resources.

#### **IV. Greater Cincinnati Water Works Response**

**Recommendation 1:** Ensure that all lead pipes are disposed of in accordance with NIOSH hazardous material storage requirements.

**Department Response:** Agree. Internal Audit's efforts alongside a thorough investigation by GCWW Staff uncovered an internal employee misappropriating lead pipes after service line replacement for personal gain. GCWW immediately suspended work by internal crews during the investigation and has since rolled out a series of additional controls to ensure this does not happen again. Those controls include updated crew requirements to report on the location and quantity of lead pipe removed, updated supervisor procedures requiring weekly recycling dumpster inspections, and increased staff training. The new controls have already been implemented by GCWW- Distribution Division supervisors.

**Recommendation 2:** Strengthen management oversight and communication regarding lead service line removal and disposal.

**Department Response:** Agree. Standard operating procedures for internal GCWW crews require use of a dumpster designated for lead service line recycling. Finding #1 of this report acknowledges that an employee was found not to be following this procedure. As mentioned in the response above, new controls have already been added to require staff to capture the location from which lead pipes were removed and the quantity removed. This data informs supervisors and enables them to provide effective oversight. Updated SOPs include tasks by supervision to verify anticipated quantities of lead are disposed of in the recycling dumpster on a weekly basis.

Additionally, recurring annual training and new employee training includes lead recycling procedures.

**Recommendation 3:** Create tracking and periodic reporting methods on the quantity of lead pipes removed, including the amount and monetary value of recycled lead.

**Department Response:** Agree. This has already been incorporated by GCWW- Distribution Division supervisors into the SOP and work order requirements. (See responses 1 and 2)

**Recommendation 4:** Institute regular, recurring training for in-house lead crew members on scrap metal pipe management procedures and ensure that documentation of completed training with employee signatures exists.

**Department Response:** Agree. This change has already been incorporated by GCWW- Distribution Division supervisors and GCWW- Safety and Training into new employee and annual training programs. (See response 2)

**Recommendation 5:** Maintain detailed records of all lead lines that have been left abandoned.

**Department Response:** Agree. This change has already been incorporated GCWW- Distribution Division supervisors into the SOP and work order requirements. (See responses 1

and 2)

**Recommendation 6:** Clarify expectations with contractors.

**Department Response:** Disagree. GCWW disagrees with the implication that there has been any lapse in water service line replacement inspection or enforcement of standards that would impact health, safety, or regulatory compliance. Every lead service line replacement completed through GCWW's program has received a passing inspection, which is required before contractor payment is authorized. We believe the concern cited in this recommendation reflects a minor disagreement between inspection staff and just one of several replacement contractors.

GCWW is constantly adapting and improving its program and is in the process of increasing the number of inspection staff and has already updated the scope of work included in its agreement with contractors.

**Recommendation 7:** Work with Procurement to complete master agreements.

**Department Response:** Disagree. The GCWW Lead Service Line Replacement Program is unique, not only to the city, but was one of the first proactive replacement programs in the Country. GCWW worked closely with the Office of Procurement, Law Department, Department of Economic Inclusion, and City leadership to establish the program and its contracting mechanisms. The established program has been working since 2018 and has resulted in over 7,500 successful lead service line replacements.

Recent regulatory changes require GCWW to accelerate the rate of lead service line replacements. To meet the requirement of replacing all lead service lines by 2037, GCWW has reached out to our colleagues in the City's Procurement and Inclusion agencies to help determine the best procurement alternatives to accelerate the rate of removal of lead service lines, increase the contracting pool, and maximize utilization of small, local, minority owned businesses. Master agreements are just one possible option under consideration. Advertising for a new one-off contracting opportunity, which may or may not involve master agreements, is expected to be released by the end of the calendar year.