SEAQUEST

Phosphorus in the Circle of Life - A Holistic Approach to Corrosion Control and Water **Quality**

TAUD Annual Conference – August 8, 2024

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Everyone deserves clean water.

Ancient Rome invented plumbing and had the same problems.

into our future problems.

Cause & Effect

https://www.nbcnews.com/think/opinion/rampage-suggests-humans-who-mess-nature-are-real-monsters-too-ncna865226

Revised US Lead & Copper Rule…

"The water system must evaluate the effect of the chemicals used for corrosion control treatment on other drinking water quality treatment processes."

Dangerous Chemicals

Disinfection Byproducts

Low Chlorine Residuals

A study cited by EPA concluded as much as 35% of the phosphorus load on wastewater plants comes from corrosion control products for drinking water

Extra Pumping & Electrical Cost

Phosphorus Discharge

> Utilities should minimize use and potential exposure to dangerous chemicals, such as phosphoric acid, sodium hydroxide & calcium hydroxide

When low residuals are encountered, more chlorine is added which leads to oxidizing more organics, which leads to excess disinfection byproducts

> "In cases where more than one treatment option can meet OCCT, systems may want to consider cost factors." -EPA, 2018

When pipe wall aren't clean, it takes more energy to pump the same amount of water, leading to excess cost and premature equipment failure

Corrosion of infrastructure leads to iron in the water, which reacts with chlorine resulting in lower residuals

The Corrosion Story

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Corrosion Process Refresher

Cathodic Protection? Anodic Protection? Oxygen Barriers? Coatings? Sac. Anodes? Charge?

https://en.wikipedia.org/wiki/Cathodic_protection

Building Mineral Scale is the Answer! ….

Pictured from left to right are a lead pipe, a corroded steel pipe, and a lead pipe treated with protective orthophosphate. Orthophospate creates a film coating inside of lead pipes that can act as a barrier, reducing at least somewhat the amount of lead that gets into tap water.

pH Control = Carbonate Scale Ortho/Zinc Phosphate = Phosphate Scale Blended Phosphate = Phosphate Scale Silica = Silica Scale

"Scale can be very complex in practice."

"Variety of scale coatings analyzed at EPA: heterogeneous, several layers, amorphous, many constituents."

-Chemistry of Lead Corrosion and Release; EPA Small Drinking Water Systems Webinar, Feb 2021; S. Triantafyllidou

EPA ORD's Advanced Materials and Solids Analysis Research Core, 2021 111111111

-Chemistry of Lead Corrosion and Release; EPA Small Drinking Water Systems Webinar, Feb 2021; S. Triantafyllidou

How Scale Theoretically Works

-Chemistry of Lead Corrosion and Release; EPA Small Drinking Water Systems Webinar, Feb 2021; S. Triantafyllidou

What Actually Happens

Practically is Difficult… Morke on Claan Pina in Theoretically is Possible… Only Works on Clean Pipe in Static Conditions…

Why add Orthophosphate?

-Chemistry of Lead Corrosion and Release; EPA Small Drinking Water Systems Webinar, Feb 2021; S. Triantafyllidou

Orthophosphate is not a corrosion inhibitor.

"The majority of distribution system pipes are composed of iron material: cast iron, ductile iron and steel." Iron corrosion byproducts are

-Review of Iron Pipe Corrosion in Drinking Water Distribution Systems; McNeill, Edwards; 2001

Any scale building corrosion technology (carbonate index calculations, orthophosphate, silica, etc…) does not work because the metal surface is not clean and the water chemistry is dynamic.

different than lead.

Tubercles are formed (rust), which is comprised of metal, minerals and organic material.

This fundamental problem impacts many other areas of water treatment.

Holistic Impacts of Corrosion Control

HOLISTIC

Why do we raise pH?

- Water is naturally more corrosive at lower pH
- Alkalinity also affects water's ability to corrode or create scale If water has high hardness; then pH is raised to cause calcium carbonate precipitation • Hardness is primarily the sum of calcium and magnesium in water
-
-
- Orthophosphates work by binding or coordinating the metals into their structures so they cannot precipitate
	- Orthophosphates have a minimum pH of 7.2; most plants operate between 7.5 – 8.2
- pH can be volatile throughout a distribution system due to dissolved oxygen and typically varies
	- pH can also be difficult to properly measure and verify across different instruments

Why is chlorine less effective above pH 7.5?

- Between pH 5 10 hypochlorous acid (HOCI) and hypochlorite ion (OCI) disassociates
- At pH 7: 78% is HOCl and 22% is OCl
- At pH 8: 78% is OCI and 22% is HOCI
- At pH 7.5: a 50/50 relationship exists
	-
-

• In terms of effectiveness against bacteria; HOCl is a .44 caliber bullet and OCl is a .22 • Bacteria have an external slime coating that must be penetrated by disinfectant to effectively kill the cell

How does corrosion influence disinfection byproducts?

Mayer, B.K., Ryan, D.R. (2017). Impact on Disinfection Byproducts Using Advanced Oxidation Processes for Drinking Water Treatment. In: Gil, A., Galeano, L., Vicente, M. (eds) Applications of Advanced Oxidation Processes (AOPs) in Drinking Water Treatment. The Handbook of Environmental Chemistry, vol 67. Springer, Cham. https://doi.org/10.1007/698_2017_82

Corrosion of infrastructure Contribute metals (typically iron) into the water Oxidizer consumption Reduced chlorine residuals Increased oxidizer use Increased DBPs

• The Stage 1 DBPR was published in the Federal Register on December 16, 1998, and the Stage 2

• DBP have been linked to liver, kidney, central nervous system problems, and reproductive effects

Why do we add Ammonia?

- DBPR was published in the Federal Register on January 4, 2006
-
- Monochloramines produce lower concentrations of regulated DBP because it is less reactive with natural organic matter
- The formation of disinfection byproducts is influenced by source water type and the type of disinfection used.
- Formation can vary daily with the amount of natural organic material in the water, temperature, rainfall, and distance from the treatment plant or other factors influencing water chemistry.
- Ammonia + Temperature + Oxygen + Bacteria = Nitrification
- Nitrification results in undesirable loss of disinfectant residual
- Heterotrophic bacteria growth is increased
- This causes adverse affects on water quality, causing taste, odor, and health issues
- Optimum pH range is 8.0 8.5

Nitrification activities within deposit sediment of drinking water supply system

What about Nitrification?

Review of [Nitrification](https://www.ncbi.nlm.nih.gov/pmc/articles/PMC8997939/#%3A~%3Atext%3DNitrification%20is%20a%20major%20challenge%2C%2C%20odour%2C%20and%20health%20issues) Monitoring and Control Strategies in Drinking Water System - PMC (nih.gov) <https://www.tceq.texas.gov/drinkingwater/disinfection/nitrification.html>

The link between weak oxidation and lead

Chlorine **Strong Oxidant** Pb^{+4} Disinfectant['] $Pb^0 \rightarrow Pb^{+2} \rightarrow Pb^{+4}$

Chloramine **Weak Oxidant** Disinfectant $Pb^{+4} \rightarrow Pb^{+2}$

-Chemistry of Lead Corrosion and Release; EPA Small Drinking Water Systems Webinar, Feb 2021; S. Triantafyllidou

Stable Corrosion Layer

Unstable Corrosion Layer

Weak oxidation from the switch to chloramines was responsible for the Washington DC "lead-in-water crisis" from 2001-2004

Photo of Cut Lead Service Line from M. Schock

Remember Pourbaix Diagrams?

- Describe conditions in which metals oxidize, and which oxidation species (scale) is most common across pH and voltage potential of the bulk water
- \bullet Eh = the energy potential of the electrolyte solution (in our case, the water). Stronger oxidation = higher Eh potential (or ORP potential)
- Newark NJ example of passive scale changing due to water chemistry changing (including nitrification)

-Chemistry of Lead Corrosion and Release; EPA Small Drinking Water Systems Webinar, Feb 2021; S. Triantafyllidou

Goal should be to stabilize pH in the distribution system (avoid swings) and hold high levels of chlorine (strong oxidation)

Workplace EHS Should be Considered

https:/[/www.sciencedirect.com/science/article/pii/B9780323476614000393](http://www.sciencedirect.com/science/article/pii/B9780323476614000393) https:/[/www.ehs.com/2014/04/sodium-hydroxide-lye-safety/](http://www.ehs.com/2014/04/sodium-hydroxide-lye-safety/) https:[//www.ehs.com/2015/06/phosphoric-acid-safety-tips/](http://www.ehs.com/2015/06/phosphoric-acid-safety-tips/)

Phosphoric acid burns

Sodium hydroxide burns

Restricted pipes increase pressure

 $Q =$ flow rate d = pipe diameter

Hagen-Poiseuille equation: $\Delta P = (8 * \lambda * L * Q) / (\pi * d^4)$

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 λ = dynamic viscosity $L =$ length of pipe

Pipe diameter and pressure have an inverse relationship

Increased pressure increases power consumption

Where: flow rate = Q (mass or volume flow rate) ΔP = the pressure difference across the pipe

 $Power = flow$ rate $*$ ΔP

It can also be represented as: Power = $Q * (P1 - P2)$

Where: $Q =$ flow rate P1 = Pressure at the inlet of pipe P2 = Pressure at the outlet of pipe

Total Cost is Important

"Systems should consider operability, reliability, system configuration, and other site-specific factors when evaluating CCT alternatives. In cases where more than one treatment option can meet the OCCT definition of the rule, systems may want to consider cost factors including costs for **capital equipment, operations, and maintenance**."

[Optimal Corrosion Control Treatment Evaluation Technical Recommendations for Primacy Agencies and Public Water Systems \(epa.gov\)](https://www.epa.gov/sites/default/files/2019-07/documents/occtmarch2016updated.pdf)

DIRECT COST -Corrosion inhibitor use cost

INDIRECT COST -Oxidizer efficiency -Oxidizer selection -Operating pH window selection -Capital feed equipment lifecycle / capex -Flushing man hours

"[L]ife can multiply until all the phosphorus is gone, and then there is an inexorable halt which nothing can prevent. We may be able to substitute nuclear power for coal, and plastics for wood, and yeast for meat, and friendliness for isolation—but for phosphorus there is neither substitute nor replacement. "

Isaac Asimov (1974)

https://quizlet.com/246086779/apes-phosphorus-cycle-diagram/

Phosphorus

- Cannot be manufactured and there is no substitute for it
	- Is essential for all living matter
- Equilibrium cause / effects from too much in the wastewater supply
	- Discharge from waste treatment plants is regulated
	- As much as 35% of wastewater flow can be due to corrosion control in drinking water (Rogers, 2014)

Wastewater vs Corrosion Control

Corrosion Control:

- Increased, more sophisticated monitoring is likely to result in greater number of lead exceedances
- Systems with 90th percentile lead results >10 ug/l will be out of compliance
	- The result will be a significant *increase* in the amount of phosphorus used

Wastewater Treatment:

- Harmful algae blooms are likely to continue escalating in frequency and severity
- Mandated use of non-phosphorus ingredients is likely to increase beyond personal care
- The result will be a significant *decrease* in the amount of acceptable phosphorus discharged

In 2020, wastewater phosphorus discharge levels in the UK were reduced

The full impact of this change on how drinking water & wastewater treatment plants are managed is significant

Wessex Water

- Equipment (pumps, dosing plant, etc.)
	- Storage of raw materials
- Emergency showers and other safety requirements
- Site upgrades and improved access for chemical deliveries
- Costs for managing increased sludge production

Highlighted 24 small wastewater treatment sites impacted by increased costs linked to these regulations. Costs include:

These costs were concluded to be "disproportionately expensive"

"The anticipated UK demand by regulated water companies for ferric and ferrous salts needed for phosphate removal in wastewater is expected to grow significantly in the next five to ten years and could exceed the current levels of UK production" *-Water Industry Journal 2021*

> "Water companies face chemical supply disruption" *-BBC Sept 7th 2021*

"Water treatment rules eased due to chemical supply failures" *-CIPD Sept 2021*

In the Future

- In the UK, technologies to control corrosion using less phosphorus, and technologies to remove phosphorus using less chemicals (generating less sludge) are being explored
- In the US, many states are interpreting the revised lead copper rule as a mandate to use larger amounts of phosphorus to control lead
- Wastewater phosphorus limits continue to be reduced, and available supply of chemicals continues to be challenging (phosphorus use for water treatment is the second least valuable market for phosphorus producers)

The more *chemicals* and *complexity* the *harder* this all gets.

HOLISTIC

A Holistic Approach to Water Quality

SEAQUEST

Why is there Corrosion?

Cathodic Protection? Anodic Protection? Oxygen Barriers? Coatings? Sac. Anodes? Charge?

https://en.wikipedia.org/wiki/Cathodic_protection

- a. Cover the light in electrical tape
- b. Disrupt the electrical current

What would be a better way to stop the light?

Why is there Corrosion?

Demonstration

- 1. Two samples of tap water one with SeaQuest
- 2. Iron is added
- 3. Bleach is added to oxidize the iron

HOW IT WORKS

SeaQuest No SeaQuest

Sequester Metals Generate Scale

 \bullet

- **Poor Performance**
- Acceptable Performance
- Excellent Performance

Traditional Selection Criteria

-
- Poor Performance
- Acceptable Performance
- Excellent Performance

Holistic Approach Selection Criteria

SeaQuest addresses every issue.

Water

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Lead /

Copper

Rogue Water Loss

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Low Chlorine

Biofilm

Low Bill Rates

Dangerous Chemicals

Clogged Pipes

Well Productivity

Regulatory Compliance

Hard-to-Feed Chemicals Hard-to-Control Chemicals

Disinfection Byproducts

Excess Flushing

SeaQuest has treated more than **8 trillion** gallons of water.

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87 customers were sampled who used SeaQuest since 2002:

• Average 90th percentile lead concentrations remain compliant and are continuously reduced

Average 90th percentile lead concentrations were reduced from 4.8 ug/l to 2.3 ug/l

63 customers were sampled who switched to SeaQuest from a different corrosion inhibitor since 2002:

Case Histories

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South East Water, UK

Problem

- High levels of phosphoric acid used for lead control where high levels of lead service lines are present
- Waters typically mix from different treatment works into different distribution zones
- Discoloration complaints began being regulated more heavily in 2017
- Equilibrium blended phosphate had been used in West Region, and was deployed in East Region to address discoloration
- Lead concentrations in distribution system are taken continuously, and any level >10 ug / l is an exceedance

About SEW

- 2.2 Million Customers
- 540 Ml/d Average Supply (142 MGD)
- 9,000 Miles of pipe
- 83 Treatment works
- 275 Boreholes
- 198 Service Reservoirs
- 10 Water Towers
- 4 Surface Water Reservoirs

Discussion:

-Overall reduction in complaints; increase in 2020 and 2022 due to iron filter pass-through and water supply issues -Reduction in max lead results (single value per year) -Reduction in % of samples > 10 ug / I (avg. 612 samples per year) -Results achieved with passive dose (possible to optimize based on changing water quality)

Supplied By:

-Keleher -Bray Gravel -Beenham (non) -Affinity (Non) -Gray well (non)

SeaQuest Use Started: -Jan 2017 (Kel.) -Feb 2017 (Bray)

Supplied By: -Barcombe 1

-Barcombe 2

SeaQuest Use Started: -Jan 2017

Las Cruces, NM

Filter pads from 1hr to 5 hrs showing iron oxidation and sequestration

Due to the high levels if iron / manganese in their source water, the City of Las Cruces, NM routinely suffered from dirty water complaints, costing $~\sim$ \$120,000 / year.

The Problem:

Various phosphates were sourced through a traditional bidding process, but often resulted in over-use and excess cost without reducing the complaints.

The Solution:

To be able to accurately mimic field performance, a new chemical evaluation protocol was developed. Raw water containing iron and manganese was oxidized before and after the addition of phosphate. The samples were stored to simulate water aging, and then filtered at 0.45 micron. Failure occurred when a visible amount of iron was observed on the filter pad, indicating a loss of sequestration. SeaQuest passed and was selected for system wide use based on highest performance and lowest use cost. As a result:

- Within one year complaints were reduced from ~ 800 to ~ 75
- The amount of SeaQuest needed did not increase from the original dose
- ~10,000 less man hours were spent flushing

Augusta, GA

The Problem:

Other phosphate-based chemicals were used, resulting in inconsistent chlorine residuals and finished water pH. Bids were awarded based on price / pound rather than performance. As a result, excess chemicals (and cost) were observed, along with substantial red water complaints due to system wide corrosion.

The Solution:

The City of Augusta moved to a performance-based specification with a dose rate guarantee and switched to SeaQuest. \$14,000 per year was saved in the ground water plant, and \$55,000 per year was saved in the surface water plant.

- All copper and lead tests remain in compliance
- Less pH adjustment was required since the distribution water was more stable
- Less chlorine was used
- Customer complaints were reduced dramatically

Problem

Periods of manganese release when the bayou turns over twice per year

- The system is all PVC
- Treatment plant was designed for 0.5 MGD with a demand of 1.2 MGD
- Potassium permanganate used for manganese removal does not achieve complete removal due to minimal residence time

Desoto Parrish, LA

Solution

Experiment was performed to identify the dose of SeaQuest required to:

- Remove manganese deposits from the PVC
- Keep the manganese soluble
- Eliminate complaints

Field trial was performed in Q4 2021

- Dose rate = 3.0 ppm of SeaQuest
- During the spring bayou changeover black water complaints were eliminated
- SeaQuest dose is being further reduced to optimize economically

Desoto Parrish, LA

Sea Cliff, NY

Pike County, GA

Prior to SeaQuest SeaQuest

The Problem:

A former orphanage was repurposed to a DFACS shelter for families fleeing violence. The facility experienced periods of neglect which resulted in inconsistent water treatment. Several lead and copper exceedances occurred from 1995- 2016.

In 2019 the 90th percentile copper measured 5.2 mg/l and lead measured 15 ug/l.

During an inspection DFACS noted the blue/green staining of sinks and bathtubs.

The Solution:

A new contract operator took over the facility to gain control of the water, repairing and installing capabilities as needed. Chlorine was stabilized and SeaQuest was installed for corrosion control. Because the system is very small, installing liquid caustic was deemed too dangerous. As a result the pH of the water ranged from 6.7-7.1. After installing SeaQuest:

- Copper corrosion was immediately controlled, and copper levels were reduced from 5.2 mg/l to 0.5 mg/l.
- Lead levels were reduced from 15 ug/l to 0 ug/l
- The facility is now fully compliant with all regulations

Brunswick, GA

The City of Spartanburg, SC switched from a traditional blended phosphate to SeaQuest at the Landrum Plant in October 2020. The Landrum plant is a surface water treatment plant averaging 0.4 MGD of production. The finished water pH is 7.3.

As a result, the following results were achieved:

- An overall 10% increase in average free chlorine residuals in the distribution system
- An overall 16% increase in average free chlorine residuals in the distribution system in the summer months from April to September
- A 74% improvement in the consistency of product quality

Opflow Vol 29, No 1: Chlorine Efficiency

Summary:

A large utility in California was facing significant biofouling complaints and had to flush extensively.

They switched to SeaQuest, and both the flushing program and complaints were reduced.

With SeaQuest, chlorine residual in distribution was able to build consistently, which reduced HPCs, biofouling and black water.

Nassau, Bahamas

Nassau, Bahamas: Red Water, Chlorine Residual

SeaQuest was used to prevent red water and build a chlorine residual in an extremely corrosive environment (LSI: -0.9)

24 hours after SeaQuest treatment

Oklahoma City, OK

Average Iron Concentration (mg/l) 0.8 0.6 0.2 Average Turbidity (NTU) \mathcal{S} \mathcal{S} \mathcal{S} ਂੇ 6/23/2001-123/2001-129/2001-21200-121200-121200-123/2001

The Problem:

Oklahoma City experienced hazy and red water complaints to the extent that TV and local newspapers reported on the red water problem.

The previous corrosion control product was ineffective even after increasing the dose rate multiple times, which resulted in excess chemical costs without solving the customer complaint problem.

The Solution:

The city evaluated SeaQuest and other products based on maximum available polyphosphate over the longest period of time. The SeaQuest performed the best and was applied to the system for a 6 month evaluation. Within 6 months:

- Average total iron concentration was reduced by 50%
- Average turbidity was reduced by 65%
- Complaints were reduced by 38% compared to the same time period in the previous 2 years

As a result, the City continued to use SeaQuest and in 2007 won the **National AWWA Best of the Best Water Taste Test at ACE07**.

Total Iron Concentration (ppm)

2.9 3.1 KPIs for both the control and SeaQuest systems were monitored:

Houston, TX

1.7 1.9 2.1 2.3 2.5 2.7 2.9

20

40

60

80

100

120

140

Firestone, CO was on track to be the next Flint, MI

Lead Concentration over Time (ppb)

- July 2015: 11 tested > 15 ppb
- December 2015: 6 tested > 15 ppb
- **January 2019: Zero (0) tested > 15 ppb**

"In Firestone SeaQuest was added to the town's water supply to prevent the breakdown of water pipes. Lead levels there are now down."

- USA Today (2016)

In Firestone, CO, 40 homes that were built before 1986 were tested for lead in the water:

"You know Flint was a disaster all the way around. There's many other ways to deal with that issue in a safe and proactive way. And our water providers in our region are doing that."

- Tom Cech,

M.S.U Denver One World One Water Center

After 100 years of scale buildup, SeaQuest improved water flow 300% in just 3 years

Town Engineer Tony Addis inspects both pipes *Stellarton, Nova Scotia (2008)*
Lead Data

SEAQUEST

Example Corrosion Coupon Study

0.01 1.87 2.36 0.87 0.68 0.57 0 2 4 6 8 10 12 Stainless Black Iron 1010 Mild Steel Copper Lead pH Treatment **SeaQuest**

In the proposed lead/copper rule, these studies can be used instead of a full pipe loop in certain areas to justify CCT changes.

100 Day Coupon Test (mpy)

SeaQuest performs well in corrosion coupon studies.

17 Day Coupon Soak Test

SeaQuest performs well in soaked coupon tests, which are more aggressive than standard coupon tests.

In this test, the SeaQuest shows better control of lead leaching than orthophosphate and zinc phosphate.

The doses range from 0.5-2.0 mg/l for the phosphate and 0.5-5.0 mg/l for the SeaQuest.

The SeaQuest outperforms all doses of both phosphates at both pH conditions, even at a low dose of 0.5 mg/l.

Lead (ug/l) at pH 7.1

Standing vs Running Pipe Loop Testing

This test shows the difference between a standing and running pipe loop test, and how SeaQuest (dosed at 0.5 mg /l) controls both copper and lead better than zinc ortho phosphate (control dosed at 2.0 mg/l)

Lead Solder Pipe Loop Testing

SeaQuest vs orthophosphate at controlling lead release from lead solder, typically found in homes.

SeaQuest loop 3 shows effectiveness at low dose and at natural pH.

oning at pH 7.2 -7.4

Int at baseline current conditions (2 ppm ortho, pH 7.2-7.4)

luring conditions for baseline to normalize data

and 24-hour periods to simulate home use for 90 days ; 23 24hr samples, 6 6hr samples

Harvested Lead Pipe Single Pass

A lead pipe previously treated with orthophosphate was harvested from the field and run through a single pass pipe loop.

- The first 7 weeks untreated water averaged 91 ppb
- The next 9 weeks SeaQuest treated water averaged 67 ppb
- The final 12 weeks SeaQuest treated water averaged 18 ppb

Customers who stopped using SeaQuest were able to regain performance after starting again

Current users of SeaQuest are all in compliance with future lead & copper rule requirements

Lead Results of SeaQuest in the US 2002-202

87 customers were sampled who used SeaQuest since 2002:

• Average 90th percentile lead concentrations remain compliant and are continuously reduced

Average 90th percentile lead concentrations were reduced from 4.8 ug/l to 2.3 ug/l

63 customers were sampled who switched to SeaQuest from a different corrosion inhibitor since 2002:

Revised Lead / Copper Rule

SECTION 2

Scope. The regulations in this subpart establish a treatment technique that includes requirements for corrosion control treatment, source water treatment, lead service line inventory, lead service line replacement, public notice, monitoring for lead in schools and child care facilities, and public education. Several of the requirements in this subpart are prompted by the lead and copper action levels or the lead trigger level, specified in [paragraph \(c\)](https://www.ecfr.gov/current/title-40/section-141.80#p-141.80(c)) of this section, as measured in samples collected at consumers' taps.

• (1) All water systems shall install and operate corrosion control treatment in accordance with $\frac{SS}{}$ [141.81](https://www.ecfr.gov/current/title-40/section-141.81) and [141.82](https://www.ecfr.gov/current/title-40/section-141.82), and that meets the definition of *optimal corrosion control treatment* at § [141.2.](https://www.ecfr.gov/current/title-40/section-141.2)

Corrosion control requirements.

• *Optimal corrosion control treatment*, for the purpose of **subpart I of this part** only, means the corrosion control treatment that minimizes the lead and copper concentrations at users' taps while ensuring that the treatment does not cause the water system to violate any national primary drinking

- - Optimum Corrosion Control Treatment
		- water regulations

Lead / Copper Rule Scope

Any water system that complies with the applicable corrosion control treatment requirements specified by the State under \S § [141.81](https://www.ecfr.gov/current/title-40/section-141.81) and [141.82](https://www.ecfr.gov/current/title-40/section-141.82) shall be deemed in compliance with the treatment requirement contained in [paragraph](https://www.ecfr.gov/current/title-40/section-141.80#p-141.80(d)(1)) $(d)(1)$ of this section.

Lead / Copper Rule Scope

141.81: eCFR :: 40 CFR 141.81 -- [Applicability of corrosion control treatment steps to small, medium, and large water systems.](https://www.ecfr.gov/current/title-40/chapter-I/subchapter-D/part-141/subpart-I/section-141.81)

141.82:

eCFR :: 40 CFR 141.82 -- [Description of corrosion control treatment requirements.](https://www.ecfr.gov/current/title-40/chapter-I/subchapter-D/part-141/subpart-I/section-141.82)

Compliance is variable based on lead inventory, lead results relative to population served, and current use of corrosion control treatment.

The majority of systems are in compliance and are not expected to be triggered into corrosion control optimization / reoptimization…

Out of compliance (simple version): Large, no corrosion, lead > 0.005 Any size, lead > 0.010

A water system whose distribution system contains lead service lines must collect all samples for monitoring under this section from sites served by a lead service line. A water system that cannot identify a sufficient number of sampling sites served by lead service lines must still collect samples from every site served by a lead service line, and collect the remaining samples in accordance with tiering requirements under paragraphs (a)(5) through (7) or paragraphs $(a)(9)$ through (10) of this section.

A water system must use the information on lead, copper, and galvanized iron or steel that is required to be identified under \S [141.42\(d\)](https://www.ecfr.gov/current/title-40/section-141.42#p-141.42(d)) when conducting a materials evaluation and the information on lead service lines that is required to be collected under $\frac{6}{9}$ [141.84\(a\)](https://www.ecfr.gov/current/title-40/section-141.84#p-141.84(a)) to identify potential lead service line sampling sites.

eCFR :: 40 CFR 141.86 -- [Monitoring requirements for lead and copper in tap water.](https://www.ecfr.gov/current/title-40/chapter-I/subchapter-D/part-141/subpart-I/section-141.86)

All tap samples for lead and copper collected in accordance with this subpart, with the exception of fifth liter samples collected under [paragraph \(b\)\(3\)](https://www.ecfr.gov/current/title-40/section-141.86#p-141.86(b)(3)) of this section, and samples collected under [paragraphs \(b\)\(5\)](https://www.ecfr.gov/current/title-40/section-141.86#p-141.86(b)(5)) and [\(h\)](https://www.ecfr.gov/current/title-40/section-141.86#p-141.86(h)) of this section, must be first draw samples. The first draw sample shall be analyzed for lead and copper in tap sampling periods where both contaminants are required to be monitored. In tap sampling periods where only lead is required to be monitored, the first draw sample may be analyzed for lead only.

Each first draw tap sample for lead and copper must be one liter in volume and have stood motionless in the plumbing system of each sampling site for at least six hours. Bottles used to collect first draw samples must be wide-mouth one-liter sample bottles. First draw samples from residential housing must be collected from the cold-water kitchen or bathroom sink tap. First draw samples from a nonresidential building must be one liter in volume and collected at a tap from which water is typically drawn for consumption. Stateapproved non-first-draw samples collected in lieu of first draw samples pursuant to **[paragraph \(b\)\(5\)](https://www.ecfr.gov/current/title-40/section-141.86#p-141.86(b)(5))** of this section must be one liter in volume and shall be collected at an interior tap from which water is typically drawn for First draw samples may be collected by the system or the system may allow residents to collect first draw samples after instructing the residents of the sampling procedures specified in this **[paragraph \(b\)\(2\)](https://www.ecfr.gov/current/title-40/section-141.86#p-141.86(b)(2))**. Sampling instructions provided to residents must not include instructions for aerator removal and cleaning or flushing of taps prior to the start of the minimum six-hour stagnation period. To avoid problems of residents handling nitric acid, acidification of first draw samples may be done up to 14 days after the sample is collected. After acidification to resolubilize the metals, the sample must stand in the original container for the time specified in the approved EPA method before the sample can be analyzed. If a system allows residents to perform sampling, the system may not challenge, based on alleged errors in sample collection, the accuracy of sampling results.

https://www[.](https://www.ecfr.gov/current/title-40/chapter-I/subchapter-D/part-141/subpart-I/section-141.86)ecfr.gov/current/title-40/chapter-I/subchapter-D/part-141/subpart-I/section-141.86#p-141.86(b).

Lead / Copper Rule Monitoring – Sampling 1

Systems must collect tap water in five consecutively numbered one-liter sample bottles after the water has stood motionless in the plumbing of each sampling site for at least six hours without flushing the tap prior to sample collection. Systems must analyze first draw samples for copper, when applicable, and fifth liter samples for lead. Bottles used to collect these samples must be wide-mouth one-liter sample bottles. Systems must collect first draw samples in the first sample bottle with each subsequently numbered bottle being filled until the final bottle is filled with the water running constantly during sample collection. Fifth liter sample is the final sample collected in this sequence. System must collect first draw and fifth liter samples from residential housing from the cold-water kitchen or bathroom sink tap First draw and fifth liter samples from a nonresidential building must be one liter in volume and collected at an interior cold water tap from which water is typically drawn for consumption. First draw and fifth liter samples may be collected by the system or the system may allow residents to collect first draw samples and fifth liter samples after instructing the residents on the sampling procedures specified in this [paragraph \(b\)\(3\)\(ii\)](https://www.ecfr.gov/current/title-40/section-141.86#p-141.86(b)(3)(ii)). Sampling instructions provided to customers must not direct the customer to remove the aerator or clean or flush the taps prior to the start of the minimum six-hour stagnation period. To avoid problems of residents handling nitric acid, the system may acidify first draw samples up to 14 days after the sample is collected. After acidification to resolubilize the metals, the sample must stand in the original container for the time specified in the approved EPA method before the sample can be analyzed. If a system allows residents to perform sampling, the system may not challenge, based on alleged errors in sample collection, the accuracy of sampling results.

https://www[.](https://www.ecfr.gov/current/title-40/chapter-I/subchapter-D/part-141/subpart-I/section-141.86)ecfr.gov/current/title-40/chapter-I/subchapter-D/part-141/subpart-I/section-141.86#p-141.86(b).

Lead / Copper Rule Monitoring – Sampling 2

eCFR :: 40 CFR 141.92 -- [Monitoring for lead in schools and child care facilities.](https://www.ecfr.gov/current/title-40/chapter-I/subchapter-D/part-141/subpart-I/section-141.92)

Five samples per school and two samples per child care facility at outlets typically used for consumption shall be collected. Except as provided in [paragraphs \(b\)\(1\)\(i\)](https://www.ecfr.gov/current/title-40/section-141.92#p-141.92(b)(1)(i)) through [\(vi\)](https://www.ecfr.gov/current/title-40/section-141.92#p-141.92(b)(1)(vi)) of this section, the outlets shall not have point-of-use (POU) devices.

Water systems must collect the samples from the cold water tap subject to the following additional requirements:

Water systems shall collect samples from at least 20 percent of elementary schools served by the system and 20 percent of child care facilities served by the system per year, or according to a schedule approved by the State, until all schools and child care facilities identified under [paragraph \(a\)\(1\)](https://www.ecfr.gov/current/title-40/section-141.92#p-141.92(a)(1)) of this section have been sampled or have declined to participate.

(A) Each sample for lead shall be a first draw sample;

(B) The sample must be 250 ml in volume;

(C) The water must have remained stationary in the plumbing system of the sampling site (building) for at least 8 but no more than 18 hours; and

(D) Samples must be analyzed using acidification and the corresponding analytical methods in \S [141.89.](https://www.ecfr.gov/current/title-40/section-141.89)

All elementary schools and child care facilities must be sampled at least once in the five years following the compliance date in $\frac{1}{2}$ [141.80\(a\)\(3\)](https://www.ecfr.gov/current/title-40/section-141.80#p-141.80(a)(3)).

Lead / Copper Rule Monitoring – Childcare

Testing If Triggered into CCT Optimization

The water system must evaluate each of the corrosion control treatments using either pipe rig/loop tests, metal coupon tests, partial-system tests, or analyses based on documented analogous treatments with other systems of similar size, water chemistry, and distribution system configurations.

Large and medium systems and small community water systems and non-transient non-community water systems that select the corrosion control treatment option under $\frac{6}{141.93}$ $\frac{6}{141.93}$ $\frac{6}{141.93}$ with lead service lines that exceed the lead action level must conduct pipe rig/loop studies using harvested lead service lines from their distribution systems to assess the effectiveness of corrosion control treatment options on the existing pipe scale. For these systems, metal coupon tests can be used as a screen to reduce the number of options that are evaluated using pipe rig/loops to the current conditions and two options.

There are levels of compliance and what needs to happen based on a lot of factors once lead > 0.010 , but CCT testing is almost always the first thing required

Testing guidance (2016):

[Optimal Corrosion Control Treatment Evaluation Technical Recommendations | US EPA](https://www.epa.gov/dwreginfo/optimal-corrosion-control-treatment-evaluation-technical-recommendations) Different checklist for population < > 50,000 Some states may be using this incorrectly. It is meant for testing guidance if there is a trigger. Some states are using it to justify change when there is no trigger

If a corrosion inhibitor is used, a minimum orthophosphate or silicate concentration measured in all tap samples that the State determines is necessary to form a passivating film on the interior walls of the pipes of the distribution system. When orthophosphate is used, such an orthophosphate concentration shall be equal to or greater than 0.5 mg/L (asPO₄) for *OCCT* designations under [paragraph \(d\)\(1\)](https://www.ecfr.gov/current/title-40/section-141.82#p-141.82(d)(1)) of this section and 1.0 mg/L for *OCCT* designations under [paragraph \(d\)\(2\)](https://www.ecfr.gov/current/title-40/section-141.82#p-141.82(d)(2)) of this section, unless the State determines that meeting the applicable minimum orthophosphate residual is not technologically feasible **or is not necessary for** *optimal corrosion control treatment.* • (A) Alkalinity and/or pH adjustment, or re-adjustment; • (B) The addition of an orthophosphate- or silicate-based corrosion inhibitor at a concentration sufficient to maintain an effective corrosion inhibitor residual concentration in all test samples if no such inhibitor is utilized;

• The water system must evaluate the effectiveness of the following treatments, and if appropriate, combinations of the following treatments to identify the optimized / re-optimized *optimal corrosion control treatment* for the system:

• (C) The addition of an orthophosphate-based corrosion inhibitor at a concentration sufficient to maintain an orthophosphate residual concentration of 1 mg/L (PO₄) in all test samples unless the current inhibitor process already meets this residual; and • (D) The addition of an orthophosphate-based corrosion inhibitor at a concentration sufficient to maintain an orthophosphate

residual concentration of 3 mg/L (PO₄) in all test samples unless the current inhibitor process already meets this residual.

NOTE: this is a minimum list of items that must be tested, not a list of approved treatments.

Testing, Continued…

Any water system shall notify the State in writing pursuant to \S [141.90\(a\)\(3\)](https://www.ecfr.gov/current/title-40/section-141.90#p-141.90(a)(3)) of any upcoming long-term change in treatment or addition of a new source as described in $\frac{141.90(a)(3)}{1}$. The State must review and approve the addition of a new source or long-term change in water treatment before it is implemented by the water system. The State may require any such water system to conduct additional monitoring or to take other action the State deems appropriate to ensure that such water system maintains minimal levels of corrosion control in its distribution system.

If a water system has notified the State in writing in accordance with $\frac{141.90(a)(3)}{3}$ $\frac{141.90(a)(3)}{3}$ $\frac{141.90(a)(3)}{3}$ of an upcoming addition of a new source or long term change in treatment, the water system shall monitor every six months at the standard number of sites listed under [paragraph \(c\)](https://www.ecfr.gov/current/title-40/section-141.86#p-141.86(c)) of this section until the system is at or below the lead and copper action levels for two consecutive six-month monitoring periods, unless the State determines that the addition of the new source or long term change in treatment is not significant and, therefore, does not warrant more frequent monitoring. Systems that do not exceed the lead and copper action levels, and/or the lead trigger level for two consecutive six-month monitoring periods may reduce monitoring in accordance with [paragraph \(d\)\(4\)](https://www.ecfr.gov/current/title-40/section-141.86#p-141.86(d)(4)) of this section.

Wastewater Treatment

SEAQUEST

The Sewage Treatment Process

https://www.thameswater.co.uk/media-library/home/about-us/responsibility/education/the-sewage-treatment-process/the-sewage-treatment-process.pdf

How does Coagulation Work?

Without Coagulant

Precipitate Formation

Settlement

Primary coagulants neutralize the charge of pollutants so they can bind together easier

Coagulation aides (flocculants) add density (particle agglomeration) so the sludge survives downstream and settles more rapidly

About Coagulants…

Charge:

Different types of pollutants carry many different attributes, which govern the selection and use of treatment process and additives. Coagulants are available with the following charges so the appropriate match to corresponding pollutant charge can be made:

- Cationic (positive)
- Anionic (negative)
- Nonionic (neutral)

Type:

- $\mathsf{Al}_2(SO_4)$ 3 – aluminum sulfate (alum)
- $FeSO_4$ ferrous sulfate
- $Fe₂(SO₄)$ 3 – ferric sulfate
- $FeCl₃$ ferric chloride
- Al $n^{\text{(OH)}}$ _m $Cl(3_{n-m})$ x – polyaluminum chloride (PAC, PACI, ACH, PACH)

Coagulants are either metallic salts or polymers. In some cases (typically industrial use) blends are utilized. The most common coagulants used in municipal wastewater treatment are:

Alum

• Alum was one of the earliest coagulants developed, and is typically produced as a 8.3% active

• Alum readily dissolves with water and does not produce staining in chemical feed equipment

- liquid or 17% active solid
-
- Alum is typically effective only at specific pH range 5.8-6.5
- over-use of alum
- decrease)

$Al_2(SO_4)_3 + 3Ca(OH)_2 \rightarrow 2Al(OH)_3 + 3CaSO_4$ Alum Lime Floc

• In some waters it can be difficult to achieve proper flocculation, often leading to a significant

• As an inorganic coagulant with zero basicity, use will decrease alkalinity of the water (pH will

Ferric

-
- Because ferric hydroxide is formed at low pH values, it is possible to use as low as pH 4.0
- Ferric floc is typically heaver and settles faster than alum floc
- with iron and manganese)
- decrease)

$Fe₂(SO₄)₃$) + 3Ca(OH)₂ \rightarrow 2Fe(OH)₃ + 3CaSO₄ Ferric sulfate Floc

• Because ferric hydroxide floc does not redissolve at higher pH values, ferric is often used for color removal when oxidizers are used (such as potassium permanganate typically associated

• As an inorganic coagulant with zero basicity, use will decrease alkalinity of the water (pH will

PAC and Engineered Coagulants

- The length of the polymerized chain, type (PACI, ACH, PACH), molecular weight and basicity is determined by the manufacturing process and degree of polymerization
- In many cases the lower basicity products (25-45%) are used for phosphorus removal
- In most cases the use of PACs consume less alkalinity than inorganic coagulants such as ferric and alum, which creates a broader pH working range and less reduction of finished water pH • Less sludge is typically created using PACs since effective dosages are typically lower
-

$\text{Al}_2(\text{OH})_5\text{Cl} \rightarrow \text{Al}_2(\text{OH})_5^+ + \text{Cl}^+ + \text{H}_2\text{O} \rightarrow 2\text{Al}(\text{OH})_3 + \text{H}^+ + \text{Cl}^-$

$Al_2(OH)_3Cl_3 \rightarrow Al_2(OH)_3^{3+} + 3Cl + 3H_2O \rightarrow 2Al(OH)_3 + 3H^+ + 3Cl^-$

-
-

Cool Things to Know

• There are other organic coagulants (such as polyDADMAC, polyamine, Tannins) which do not depress pH and generate very little sludge, however they are typically not used in municipal water treatment because they underperform metallic coagulants in removing color and organic

• Disinfection with sodium hypochlorite typically raises the pH of the finished water, and in some

- materal
- cases where PACs are used this is enough to eliminate post-coagulant lime feed
- Basicity is a measure of the number of hydroxyl ions included in the structure of a metallic since there are no OH-)
-

coagulant. The higher the basicity the less impact on finished water pH. (alum has zero basicity

• Flocculants can be used for rapid settling or to add strength to the sludge. Typical flocculants:

-Bentonite

- -Calcium Carbonate
- -Sodium Silicate
- -Anionic Polymers (various molecular weights)
- -Nonionic Polymers (various molecular weights)