



May 15, 2017

U.S. Environmental Protection Agency  
Docket ID No. EPA-HQ- OA-2017-0190

Dear Docket:

In response to the notice in the *Federal Register* of April 13, 2017 (82 FR 17793) the Association of State Drinking Water Administrators (ASDWA) would like to offer suggestions for consideration for potential regulatory revisions. ASDWA supports and represents the collective interests of the states, territories, and the Navajo Nation in their administration of national drinking water program requirements within their states or territories.

ASDWA supports the regulatory development processes in the 1996 Amendments to the Safe Drinking Water Act (SDWA). These processes are the foundation for developing sound national drinking water regulations that protect public health and maintain the economic health of our communities. The regulatory processes for identifying new contaminants for potentially regulating, the factors that must be considered when finalizing a new national drinking water regulation, and the review of existing regulations to account for new data all combine to form a strong regulatory development process that cannot be weakened and still protect public health.

Under the SDWA, 91 contaminants are currently regulated, and these regulations need to remain in place to maintain public health protection. Currently, there are no specific drinking water regulations that are clearly unnecessary or unwarranted, but some refinements to monitoring waivers could be considered. EPA already reviews all existing drinking water regulations every six years to consider any new health effects, analytical method, occurrence or treatment data as required by Section 1412(b)(9) of the SDWA. The Third Six-Year Review was completed in late 2016 (82 FR 3518) and EPA determined that eight regulations were candidates for revision.

Additionally, Section 1412(b)(9) of the SDWA also contains what is commonly referred to as the “anti-backsliding” provision as part of the review of existing regulations:

*REVIEW AND REVISION.-- The Administrator shall, not less often than every 6 years, review and revise, as appropriate, each national primary drinking water regulation promulgated under this title. Any revision of a national primary drinking water regulation shall be promulgated in accordance with this section, except that each revision shall maintain, or provide for greater, protection of the health of persons.*

However, states that are directly implementing the drinking water regulations may see opportunities for more efficient and effective approaches to meeting regulatory requirements, while still protecting public health and maintaining the economic health of communities. ASDWA believes that some of the current SDWA regulatory requirements could be streamlined and still protect public health. Regulatory revisions that preserve flexibility for the state primacy agencies, streamline implementation processes, and limit unfunded mandates while still meeting SDWA statutory requirements and protecting public health would be welcomed.

ASDWA is providing recommendations for EPA's consideration for some drinking water rules that might be revised to improve implementation and reduce the burden on states and water systems while continuing to provide needed public health protection. The priorities for states are those regulations where modifications can have the greatest impact on state resources. In these tight budget times, state drinking water programs must make the most efficient and effective use of their resources. Some elements of existing rules make it more difficult to effectively manage limited state resources. Making appropriate regulatory revisions will, we believe, help ensure that state dollars and state staff are focused on the activities that provide the greatest public health protection, while not investing in actions where the return is minimal. Saving water systems from unnecessary work is also a goal of states.

ASDWA has several specific recommendations to consider for potential regulatory revisions that are detailed in the attachment to this letter, and the regulatory revisions for consideration build upon prior recommendations for regulatory revisions from a 2011 Executive Order. However, ASDWA recommends that EPA proceed cautiously and judiciously in its consideration of any potential regulatory revisions. Water systems and state primacy agencies work in concert to protect public health and maintain the economic health of communities and many drinking water regulations interact with each other to achieve these goals. Maintaining simultaneous compliance with all the regulations is critical, and public health protection must not be comprised in the interest of reducing regulatory burden. Water systems and states must avoid any unintended consequences from any regulatory revisions to maintain public health protection and the economic health of our communities.

If you have any questions about these recommendations, please feel free to email me at [aroberson@asdwa.org](mailto:aroberson@asdwa.org) or call me (703-812-9507).

Sincerely,

A handwritten signature in blue ink that reads "J. Alan Roberson". The signature is written in a cursive style with a large initial "J".

Alan Roberson, P.E.  
Executive Director

## **ASDWA's Recommendations for Regulatory Revisions to Consider**

### **Consumer Confidence Reports:**

#### **Consider Eliminating the Certification Requirement for Consumer Confidence Report (CCR)**

EPA should consider removing the CCR certification requirement (141.155). A significant amount of state resources is invested in tracking and compliance activities to comply with this requirement. It is also an extra step that the water system must complete even though the public has already been informed. The water system should be required to keep a copy of the report they provided to customers, but there would not be a separate certification requirement. States could review the documentation during a sanitary survey or at any time they suspected noncompliance, but the burden of providing and tracking the certifications would be eliminated. It makes more sense for states to invest in tracking PN certifications to ensure PN was done for violations, rather than follow-up on CCR certifications.

#### **Reference:**

141.155 (c) No later than the date the system is required to distribute the report to its customers, each community water system must mail a copy of the report to the primacy agency, followed within 3 months by a certification that the report has been distributed to customers, and that the information is correct and consistent with the compliance monitoring data previously submitted to the primacy agency.

#### **Consider Eliminating the Requirement for Using Whole Numbers in the CCR**

EPA should consider eliminating the requirement (141.153 (d)(4)(i)) in the Consumer Confidence Report Rule which mandates that only whole numbers be used for reporting contaminant levels and MCL levels. This requirement to change reporting units just for the CCR just doesn't make a lot of sense and is potentially misleading to consumers. This requirement assumes that lay people are not familiar with decimals. Although many small community water systems are governed by a volunteer board or others with limited technical background, we believe they can generally manage decimals that might have a few zeros before an integer.

The artifact of using whole numbers and changing the units between the regulation and the CCR is likely to create confusion. When an interested consumer looks on the EPA website, or one of the states' websites, and sees that the MCL for benzene is 0.005 mg/L then gets a CCR which says they have detected 2 µg/L of benzene in their water, it may cause the reader to question the safety of that level in their drinking water. It is much easier to report the monitoring result in the same units as the MCL and then simply explain that 0.002 is less than 0.005. Thus, a simple remedy is to define the units in the CCR to correspond to the units used for the MCL for all water systems. This makes it easier to reconcile CCR values with actual test results taken by the water system, and eliminates a potential source of conversion errors.

**Reference:**

141.153 (d)

(4) For detected regulated contaminants (listed in appendix A to this subpart), the table(s) must contain:

(i) The MCL for that contaminant expressed as a number equal to or greater than 1.0 (as provided in appendix A to this subpart);

**Public Notice Rule:**Modify Tier 3 Public Notice

The one year time limit (141.204 (b)) to report the Tier 3 PN appears to be ineffective. Consumers are upset when they find out a year later that their water system was not in compliance, however there is really no action they can take this long after the event to enhance their own health protection. In fact, they are not going to be able to use this information to protect their health even if notified prior to a year because the types of violations covered by Tier 3 PN are not directly health related. Systems are often providing public notice for paperwork violations. It might be more protective of public health to drop PN entirely for paperwork violations and elevate multiple violations for something significant like failure to monitor up to Tier 2. Under such a revision, a more immediate notice would be required and public pressure could encourage a response by the system before additional violations are accrued. Placing the Tier 3 public notice in the CCR appears, at first blush, to simplify the process, and it may for water systems, but it also sets up a tracking nightmare for states. It is too time-consuming to search all CCR's for a PN and communities don't understand that the entire PN must be inserted in the CCR. So, many systems that think they are covered when their CCR is issued are, in fact, still open for a PN violation.

**Reference:**

141.204(b) *When is the Tier 3 public notice to be provided?* (1) Public water systems must provide the public notice not later than one year after the public water system learns of the violation or situation or begins operating under a variance or exemption. Following the initial notice, the public water system must repeat the notice annually for as long as the violation, variance, exemption, or other situation persists. If the public notice is posted, the notice must remain in place for as long as the violation, variance, exemption, or other situation persists, but in no case less than seven days (even if the violation or situation is resolved).

(2) Instead of individual Tier 3 public notices, a public water system may use an annual report detailing all violations and situations that occurred during the previous twelve months, as long as the timing requirements of paragraph (b)(1) of this section are met.

**Phase II/V:**Revisit the Occurrence of Phase II/V Contaminants (SOC, IOC, VOC)

ASDWA recommends revisiting the Phase II/V contaminants (SOC, IOC, VOC), and determine which have not been sold/available for decades and what occurrence there has been nationwide in the past ten years. The regulations for some contaminants that have not been found and haven't been manufactured for some period of time could possibly be eliminated. Alternatively, EPA could establish a nationwide monitoring waiver. Many states have a waiver program that allows monitoring to be reduced for contaminants that are not likely to be found or where the source is not susceptible. However, states or water

systems must invest significant resources to support these monitoring waivers. If EPA works on a national basis to make these determinations, state resources will likely be saved.

### Eliminate Old Arsenic Language

The Arsenic rule still contains some language (141.11(a) and (b)) related to the previous MCL of 0.05 mg/L which is no longer in effect. This language should be eliminated to avoid confusion and clean up the rule.

#### Reference:

141.21

(a) The maximum contaminant level for arsenic applies only to community water systems. The analyses and determination of compliance with the 0.05 milligrams per liter maximum contaminant level for arsenic use the requirements of § 141.23.

(b) The maximum contaminant level for arsenic is 0.05 milligrams per liter for community water systems until January 23, 2006.

#### **Sodium:**

### Eliminate the special monitoring requirement for sodium at community systems.

ASDWA recommends eliminating the special monitoring requirement for sodium at community systems (141.41), as this would ease the monitoring burden with minimal impact on the health of the public. It's doubtful that this requirement is having the added public health value that was originally intended. People diagnosed with hypertension are aware of the need for sodium restricted diets through their medical provider. Additionally, a person residing in a home with a salt water softener plumbed into the drinking faucets may have a false sense of security with sodium levels if they rely on values that the city publicizes for sodium levels in their system.

#### Reference:

141.41

(a) Suppliers of water for community public water systems shall collect and analyze one sample per plant at the entry point of the distribution system for the determination of sodium concentration levels; samples must be collected and analyzed annually for systems utilizing surface water sources in whole or in part, and at least every three years for systems utilizing solely ground water sources. The minimum number of samples required to be taken by the system shall be based on the number of treatment plants used by the system, except that multiple wells drawing raw water from a single aquifer may, with the State approval, be considered one treatment plant for determining the minimum number of samples. The supplier of water may be required by the State to collect and analyze water samples for sodium more frequently in locations where the sodium content is variable.

#### **Disinfection By-Products (DBPs):**

### Considering Allowing States to Further Reduce DBPR Monitoring Requirements for Small Systems

States should be able to allow additional reductions in Disinfection By-Product Rule (DBPR) monitoring requirements for groundwater systems that consistently have very low

DBPs. Some states have many small ground water systems that have very low levels of DBP precursors and therefore have levels of Total Trihalomethanes (TTHMs) and Haloacetic Acids (HAA5s) that are consistently “Non-Detect”, or below 10 milligrams per liter (mg/L).

Currently, the reduced monitoring for DBPs (141.623) is once per 3 years for very small systems and once per year for larger systems. While it may appear that this minimal monitoring requirement doesn't add much cost, for a small school or subdivision serving 25 people, \$300 every 3 years can be a significant expense. States would like the option of reducing the monitoring to less frequently than every three years, where water quality and treatment are well defined and stable and DBP levels are consistently “Non-Detect”, or below 10 milligrams per liter (mg/L). Some states may want to maintain more frequent monitoring requirements, but other states would like the option for less frequent monitoring requirements.

#### Reference:

141.623

(a) You may reduce monitoring to the level specified in the table in this paragraph (a) any time the LRAA is  $\leq 0.040$  mg/L for TTHM and  $\leq 0.030$  mg/L for HAA5 at all monitoring locations. You may only use data collected under the provisions of this subpart or subpart L of this part to qualify for reduced monitoring. In addition, the source water annual average TOC level, before any treatment, must be  $\leq 4.0$  mg/L at each treatment plant treating surface water or ground water under the direct influence of surface water, based on monitoring conducted under either § 141.132(b)(1)(iii) or § 141.132(d).

#### Allow States to Reduce Maximum Residual Disinfectant Level (MRDL) Reporting Requirements for Small Systems

There is also no allowance for reduced monitoring for chlorine residual for the above-described small systems. While the cost of this monitoring is not great, the reporting can be burdensome (141.134). The monthly averages of all TCR site chlorine levels must be submitted each quarter, with a running annual average calculated. The MRDL is 4.0 mg/L; however, most of these ground water systems have levels  $< 0.5$  mg/L. When water quality and treatment are well defined and stable, additional reductions in reporting should be allowed at state discretion.

For example, a system which reports the daily chlorine levels could be exempted from the MRDL calculation if the chlorine levels never exceed half the MRDL. Very few systems required to comply with the MRDL have approached the MRDL of 4.0 mg/L in the many years this rule has been in effect. It doesn't make sense to have the operators calculate the MRDL each quarter (and have the possibility of incurring a violation for failure to calculate it), if the reported chlorine levels never exceed 2.0 mg/L. On the state side, resources are expended tracking the reported chlorine residual levels when the MRDL is almost never exceeded. The effort should be expended on those very few systems that approach the MRDL. Even when a single sample does approach the MRDL, the average MRDL calculation is seldom in jeopardy.

#### Reference:

141.133 (3) c) *Disinfectant residuals* — (1) *Chlorine and chloramines*. (i) Compliance must be based on a running annual arithmetic average, computed quarterly, of monthly averages of all samples collected by the system under §141.132(c)

(1). If the average covering any consecutive four-quarter period exceeds the MRDL, the system is in violation of the MRDL and must notify the public pursuant to subpart Q, in addition to reporting to the State pursuant to §141.134.

141.153 (3) (iv) *Maximum residual disinfectant level or MRDL*: The highest level of a disinfectant allowed in drinking water. There is convincing evidence that addition of a disinfectant is necessary for control of microbial contaminants.

141.134 (1) System monitoring for chlorine or chloramines under the requirements of §141.132(c)

(i) The number of samples taken during each month of the last quarter.

(ii) The month arithmetic average of all samples taken in each month for the last 12 months.

(iii) The arithmetic average of the monthly averages for the last 12 months.

(iv) Whether, based on §141.133(c) (1), the MRDL was violated.

### **Lead and Copper Rule (LCR):**

*Special Note on the Lead and Copper Rule –EPA is currently developing proposed Long-Term Revisions to the Lead and Copper Rule (LT-LCR) based on recommendations from the National Drinking Water Advisory Council (NDWAC). EPA may address some of these issues and propose to revise the existing language. States favor the changes listed here and would like EPA to consider them, recognizing that the final changes may have to be integrated with the NDWAC’s recommendations.*

### Modify or Eliminate Old Language

Section 141.81(d) contains specific dates by which a large system must complete certain steps. These dates are no longer relevant. If this section is to remain, it should be focused on the steps and timelines related to new large water systems (either those newly established due to consolidation or reclassified due to a population increase).

### Reference:

141.81(d) *Treatment steps and deadlines for large systems*. Except as provided in paragraph (b) (2) and (3) of this section, large systems shall complete the following corrosion control treatment steps (described in the referenced portions of §§141.82, 141.86, and 141.87) by the indicated dates.

(1) *Step 1*: The system shall conduct initial monitoring (§141.86(d)(1) and §141.87(b)) during two consecutive six-month monitoring periods by January 1, 1993.

(2) *Step 2*: The system shall complete corrosion control studies (§141.82(c)) by July 1, 1994.

(3) *Step 3*: The State shall designate optimal corrosion control treatment (§141.82(d)) by January 1, 1995.

(4) *Step 4*: The system shall install optimal corrosion control treatment (§141.82(e)) by January 1, 1997.

(5) *Step 5*: The system shall complete follow-up sampling (§141.86(d)(2) and §141.87(c)) by January 1, 1998.

(6) *Step 6*: The State shall review installation of treatment and designate optimal water quality control parameters (§141.82(f)) by July 1, 1998.

(7) *Step 7*: The system shall operate in compliance with the State-specified optimal water quality control parameters (§141.82(g)) and continue to conduct tap sampling (§141.86(d)(3) and §141.87(d)).

### Eliminate Water Quality Parameter (WQP) Monitoring and OCCT Plans for System Utilizing Plumbing Replacement

The WQP requirements (141.87) and other OCCT requirements (141.81) should be eliminated for systems that have complete control over their plumbing (schools, institutions, etc.) and elect to complete a full plumbing replacement or lining inserts of all lines. If this change were allowed, consumer confidence would be increased because contact with lead and copper would be eliminated rather than relying on a treatment process. Most parents would rather their children went to a school without lead pipes than with OCCT.

## Reference:

141.87 (ii) Except as provided in paragraph (c)(3) of this section, systems shall collect two samples for each applicable water quality parameter at each entry point to the distribution system during each monitoring period specified in paragraph (b) of this section. During each monitoring period specified in paragraphs (c)–(e) of this section, systems shall collect one sample for each applicable water quality parameter at each entry point to the distribution system.

OCCT Plans 141.81. (a) Systems shall complete the applicable corrosion control treatment requirements described in §141.82 by the deadlines established in this section.

(2) A small system (serving ≤3300 persons) and a medium-size system (serving >3,300 and ≤50,000 persons) shall complete the corrosion control treatment steps specified in paragraph (e) of this section, unless it is deemed to have optimized corrosion control under paragraph (b)(1), (b)(2), or (b)(3) of this section.

## Modify Water Quality Parameter (OWQP) Requirements

Currently, the setting of OWQPs is done to eliminate excursions in corrosion control that would cause a rise in lead or copper levels in the distribution system. Measurement, reporting, and tracking of OWQPs is a burden for water systems and states and can lead to many unintentional violations that further increase the burden with little value added. As currently configured, OWQPs do not provide adequate operational control to insure optimal treatment. To simplify the process and reduce burden, default OWQPs should be established for small and medium sized systems with states given flexibility for setting individual OWQPs for large systems. Further, the frequency of sample collection and reporting should be examined to identify more options for streamlining the processing of OWQPs.

## Reference:

141.87 (ii) Except as provided in paragraph (c)(3) of this section, systems shall collect two samples for each applicable water quality parameter at each entry point to the distribution system during each monitoring period specified in paragraph (b) of this section. During each monitoring period specified in paragraphs (c)–(e) of this section, systems shall collect one sample for each applicable water quality parameter at each entry point to the distribution system.

*141.81 Applicability of corrosion control treatment steps to small, medium-size and large water systems.*

(a) Systems shall complete the applicable corrosion control treatment requirements described in §141.82 by the deadlines established in this section.

(1) A large system (serving >50,000 persons) shall complete the corrosion control treatment steps specified in paragraph (d) of this section, unless it is deemed to have optimized corrosion control under paragraph (b)(2) or (b)(3) of this section.

(2) A small system (serving ≤3300 persons) and a medium-size system (serving >3,300 and ≤50,000 persons) shall complete the corrosion control treatment steps specified in paragraph (e) of this section, unless it is deemed to have optimized corrosion control under paragraph (b)(1), (b)(2), or (b)(3) of this section.

(b) A system is deemed to have optimized corrosion control and is not required to complete the applicable corrosion control treatment steps identified in this section if the system satisfies one of the criteria specified in paragraphs (b)(1) through (b)(3) of this section. Any such system deemed to have optimized corrosion control under this paragraph, and which has treatment in place, shall continue to operate and maintain optimal corrosion control treatment and meet any requirements that the State determines appropriate to ensure optimal corrosion control treatment is maintained.

(1) A small or medium-size water system is deemed to have optimized corrosion control if the system meets the lead and copper action levels during each of two consecutive six-month monitoring periods conducted in accordance with §141.86.

(2) Any water system may be deemed by the State to have optimized corrosion control treatment if the system demonstrates to the satisfaction of the State that it has conducted activities equivalent to the corrosion control steps applicable to such system under this section. If the State makes this determination, it shall provide the system with written notice explaining the basis for its decision and shall specify the water quality control parameters representing optimal corrosion control in accordance with §141.82(f). Water systems deemed to have optimized corrosion control under this paragraph shall operate in compliance with the State-designated optimal water quality control parameters in accordance with §141.82(g) and continue to conduct lead and copper tap and water quality parameter sampling in



accordance with §141.86(d)(3) and §141.87(d), respectively. A system shall provide the State with the following information in order to support a determination under this paragraph:

- (i) The results of all test samples collected for each of the water quality parameters in §141.82(c)(3).
- (ii) A report explaining the test methods used by the water system to evaluate the corrosion control treatments listed in §141.82(c)(1), the results of all tests conducted, and the basis for the system's selection of optimal corrosion control treatment;
- (iii) A report explaining how corrosion control has been installed and how it is being maintained to insure minimal lead and copper concentrations at consumers' taps; and
- (iv) The results of tap water samples collected in accordance with §141.86 at least once every six months for one year after corrosion control has been installed.

(3) Any water system is deemed to have optimized corrosion control if it submits results of tap water monitoring conducted in accordance with §141.86 and source water monitoring conducted in accordance with §141.88 that demonstrates for two consecutive 6-month monitoring periods that the difference between the 90th percentile tap water lead level computed under §141.80(c)(3), and the highest source water lead concentration is less than the Practical Quantitation Level for lead specified in §141.89(a)(1)(ii).

(i) Those systems whose highest source water lead level is below the Method Detection Limit may also be deemed to have optimized corrosion control under this paragraph if the 90th percentile tap water lead level is less than or equal to the Practical Quantitation Level for lead for two consecutive 6-month monitoring periods.

(ii) Any water system deemed to have optimized corrosion control in accordance with this paragraph shall continue monitoring for lead and copper at the tap no less frequently than once every three calendar years using the reduced number of sites specified in §141.86(c) and collecting the samples at times and locations specified in §141.86(d)(4)(iv). Any such system that has not conducted a round of monitoring pursuant to §141.86(d) since September 30, 1997, shall complete a round of monitoring pursuant to this paragraph no later than September 30, 2000.

(iii) Any water system deemed to have optimized corrosion control pursuant to this paragraph shall notify the State in writing pursuant to §141.90(a)(3) of any upcoming long-term change in treatment or addition of a new source as described in that section. 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 system to conduct additional monitoring or to take other action the State deems appropriate to ensure that such systems maintain minimal levels of corrosion in the distribution system.

(iv) As of July 12, 2001, a system is not deemed to have optimized corrosion control under this paragraph, and shall implement corrosion control treatment pursuant to paragraph (b)(3)(v) of this section unless it meets the copper action level.

(v) Any system triggered into corrosion control because it is no longer deemed to have optimized corrosion control under this paragraph shall implement corrosion control treatment in accordance with the deadlines in paragraph (e) of this section. Any such large system shall adhere to the schedule specified in that paragraph for medium-size systems, with the time periods for completing each step being triggered by the date the system is no longer deemed to have optimized corrosion control under this paragraph.

(c) Any small or medium-size water system that is required to complete the corrosion control steps due to its exceedance of the lead or copper action level may cease completing the treatment steps whenever the system meets both action levels during each of two consecutive monitoring periods conducted pursuant to §141.86 and submits the results to the State. If any such water system thereafter exceeds the lead or copper action level during any monitoring period, the system (or the State, as the case may be) shall recommence completion of the applicable treatment steps, beginning with the first treatment step which was not previously completed in its entirety. The State may require a system to repeat treatment steps previously completed by the system where the State determines that this is necessary to implement properly the treatment requirements of this section. The State shall notify the system in writing of such a determination and explain the basis for its decision. The requirement for any small- or medium-size system to implement corrosion control treatment steps in accordance with paragraph (e) of this section (including systems deemed to have optimized corrosion control under paragraph (b)(1) of this section) is triggered whenever any small- or medium-size system exceeds the lead or copper action level.

(e) *Treatment Steps and deadlines for small and medium-size systems.* Except as provided in paragraph (b) of this section, small and medium-size systems shall complete the following corrosion control treatment steps (described in the referenced portions of §§141.82, 141.86 and 141.87) by the indicated time periods.

(1) *Step 1:* The system shall conduct initial tap sampling (§141.86(d)(1) and §141.87(b)) until the system either exceeds the lead or copper action level or becomes eligible for reduced monitoring under §141.86(d)(4). A system exceeding the lead or copper action level shall recommend optimal corrosion control treatment (§141.82(a)) within six months after the end of the monitoring period during which it exceeds one of the action levels.

(2) *Step 2:* Within 12 months after the end of the monitoring period during which a system exceeds the lead or copper action level, the State may require the system to perform corrosion control studies (§141.82(b)). If the State does not require the system to perform such studies, the State shall specify optimal corrosion control treatment (§141.82(d)) within the following timeframes:

(i) For medium-size systems, within 18 months after the end of the monitoring period during which such system exceeds the lead or copper action level.

- (ii) For small systems, within 24 months after the end of the monitoring period during which such system exceeds the lead or copper action level.
- (3) *Step 3*: If the State requires a system to perform corrosion control studies under step 2, the system shall complete the studies (§141.82(c)) within 18 months after the State requires that such studies be conducted.
- (4) *Step 4*: If the system has performed corrosion control studies under step 2, the State shall designate optimal corrosion control treatment (§141.82(d)) within 6 months after completion of step 3.
- (5) *Step 5*: The system shall install optimal corrosion control treatment (§141.82(e)) within 24 months after the State designates such treatment.
- (6) *Step 6*: The system shall complete follow-up sampling (§141.86(d)(2) and §141.87(c)) within 36 months after the State designates optimal corrosion control treatment.
- (7) *Step 7*: The State shall review the system's installation of treatment and designate optimal water quality control parameters (§141.82(f)) within 6 months after completion of step 6.
- (8) *Step 8*: The system shall operate in compliance with the State-designated optimal water quality control parameters (§141.82(g)) and continue to conduct tap sampling (§141.86(d)(3) and §141.87(d)).