



**Sampling Pool**

**1. How many sample sites am I required to maintain in my lead and copper tap sampling pool?**

The minimum number of sample sites that must be maintained in the sampling pool is based upon the six-month monitoring (i.e. standard monitoring) frequency and the population served by the water system. It is recommended that Suppliers include more sites than the minimum number required for their sampling pools. Information about these requirements is provided in the following table.

System Population	<u>Minimum</u> # of Sites Required in Pool	<u>Recommended</u> # of Sites in Pool
> 100,000	100	150
10,001 - 100,000	60	90
3,301 - 10,000	40	60
501 - 3,300	20	30
101 - 500	10	15
< 101	5	10

**2. If I am on a reduced monitoring schedule (i.e. annual or three-year), how many sample sites am I required to maintain in my sampling pool?**

The minimum number of sample sites that must be maintained in the sampling pool is based upon the six-month monitoring (i.e. standard monitoring) frequency and the population served by the water system. This is required regardless of sampling schedule. Please refer to the table included in the previous answer for the minimum number of sampling sites that must be maintained in your sampling pool.

**3. How many samples am I required to collect on a reduced schedule?**

The minimum number of samples that must be collected for each sampling frequency are provided in the following table.

Water systems on a reduced sampling schedule must collect samples from sites in the sampling pool that are representative of all of the sites in the sampling pool at the appropriate tier level.



<b>System Population</b>	<b><u>Minimum</u> # of Sites for six-month sampling frequency</b>	<b><u>Minimum</u> # of Sites for annual, three-year sampling frequency</b>
> 100,000	100	50
10,001 - 100,000	60	30
3,301 - 10,000	40	20
501 - 3,300	20	10
101 - 500	10	5
< 101	5	5

#### 4. How do I select the sample sites for my sampling pool?

The LCR establishes a tiering system for selecting and prioritizing lead and copper tap sampling sites.

- a) Suppliers must complete a materials evaluation to identify lead, copper and galvanized steel materials in the distribution system. The following sources of information should be utilized in performing the materials evaluation:
  - Plumbing Codes;
  - Plumbing Permits;
  - Distribution Maps and Drawings;
  - Inspection and Maintenance Records;
  - Meter Installation Records;
  - Capital Improvement and Master Plans;
  - Standard Operating Procedures;
  - Operation and Maintenance Manuals;
  - Permit Files;
  - Existing Water Quality Data;
  - Interviews with Senior Personnel, Building Inspectors, and Retirees; and Community Survey.
- b) The results of the materials evaluation must be used in the development and ongoing maintenance of the Supplier’s lead and copper sampling pool.
  - i. All Tier 1 sites must be included in the sampling pool. As long as Tier 1 sites are accessible and meet the priority site requirements, lower Tier (2, 3 or R) cannot be included in the sampling pool to meet the minimum number requirements.
  - ii. When a sufficient number of Tier 1 sites do not exist or are inaccessible the sampling pool must be completed with Tier 2 sites. Once Tier 2 sites are exhausted, Tier 3 sites must be exhausted before selecting sites that are “representative”. A site is “representative” if its plumbing is similar to that of other sites in your system.



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- iii. If the Supplier identifies that the distribution system contains lead service lines, the sampling pool must:
  - Populate 50% of the sampling pool with lead service lines (unless a sufficient number of sites is accessible).
  - If there are not enough sites with lead service lines to populate 50% of the sampling pool, include all sites with lead service lines (unless the site is inaccessible) and populate 50% of the sampling pool with sites that contain lead pipes or copper pipes with lead solder.

The sample site selection tiering system is provided in the following table.

Tier Level	Community Water System (Sampling Pool for Any System With Lead Service Lines Must Contain: 50% of Structures With Lead Service Lines and 50% With Copper Pipes and Lead Solder, or Lead Pipes)	Non-Community Water System
Tier 1	Single family structures, currently being used as either a residence or place of business: <ol style="list-style-type: none"> <li>1. Containing copper pipe with lead solder installed after 1982 and before 1988.</li> <li>2. Are served by a lead service line (no year restriction)</li> <li>3. *Multi-family structures served by a lead service line may be used if at least 20% of the sites served by the system are multi-family structures with lead</li> </ol>	Buildings: <ol style="list-style-type: none"> <li>1. Containing copper pipe with lead solder installed after 1982 and before 1988.</li> <li>2. Are served by a lead service line (no year restriction)</li> <li>3. Containing lead pipes (no year restriction)</li> </ol>
Tier 2	Multiple-family residences and Buildings: <ol style="list-style-type: none"> <li>1. Number of Site Locations Containing copper pipe with lead solder installed after 1982 and before 1988.</li> <li>2. Are served by a lead service line (no year restriction)</li> <li>3. Containing lead pipes (no year restriction)</li> </ol>	Buildings: Containing copper pipes with lead solder installed before 1983
Tier 3	Single-family structures: Containing copper pipes with lead solder installed before 1983	Typically found throughout the distribution system
Representative	Typically found throughout the distribution system	



## 5. I'm not sure if the sites in my sampling pool are appropriate. What do I do?

The Supplier is responsible for evaluating the sample sites in its sampling pool to determine if they meet the appropriate tier levels. If all sites do not meet the tier criteria in the regulations, the Supplier must identify sample sites that meet the tier criteria in the regulations and must submit the replacement site information to the Department along with the required site selection information for each site.

## 6. How do I change sample sites in my sample pool?

The Supplier must submit a sample site change form (available at <https://www.colorado.gov/cdphe/lcr>) or submit all of the information included on the form.

## 7. How do I add a new site to my sample pool?

The Supplier must submit a sample site change form (available at <https://www.colorado.gov/cdphe/lcr>) or submit all of the information included on the form. If you are using the form and there are no sites being replaced and only new sites being added, indicate "N/A" in the row(s) identified as "Old".

## 8. What if I need to remove a sample site from my pool because the resident is refusing to collect samples, but I do not want to lose track of the site as a possible site for inclusion in the future if a new resident occupies the home?

The Supplier must submit a sample site change form (available at <https://www.colorado.gov/cdphe/lcr>) or submit all of the information included on the form to remove the site from the sampling pool and to add a replacement site if needed to meet the minimum number of sample sites for the pool.

The Supplier can maintain information about "potential" sample sites that is separate form and is not included in the sampling pool. Supplier must submit sample site change form (or equivalent information) for a site to be included in the sampling pool.

## **Sample Collection**

### 9. Is there any guidance for collecting lead and copper tap samples?

Yes. [Lead and copper sample collection instructions](#) are available on our website at <https://www.colorado.gov/cdphe/lcr>. The guidance aligns with [recent clarification](#) that has been provided by the EPA regarding the collection of lead and copper tap samples.

### 10. Where must lead and copper samples be collected?

- Unless a Tier 1 site is no longer accessible to the Supplier or the site no longer meets the priority site requirements (see discussion below), all Tier 1 sites must be sampled every monitoring period.



- As long as a sufficient number of Tier 1 sites are accessible to meet the minimum sample number requirements lower Tier sites (2, 3 or R) cannot be sampled in place of Tier 1 sites.
- **For water systems on the standard (6-month) monitoring schedule-**  
If the Supplier's sampling pool contains more than the minimum number of priority sample sites (required by the regulations, first-draw tap samples for lead and copper must be collected from the minimum required number of sites in the sampling pool.
- **For water systems on a reduced (annual or 3-year) monitoring schedule,** first-draw samples for lead and copper must be collected from sites in the sampling pool that are representative of all of the sites in the sampling pool.

### 11. Do I always have to collect samples at the same sites?

- You must use the same sites unless a site is no longer accessible to you (e.g. homeowner refuses to collect samples or allow the Supplier to collect samples) OR no longer fits the requirements of a priority site (e.g. the lead service line that served a site has been removed).
  - For any sample site that was sampled during a previous monitoring period, but is not sampled in the current monitoring period, the Supplier must submit an explanation (regarding each site not sampled in previous monitoring period) to the Department no later than the 10<sup>th</sup> of the month following the end of the monitoring period.
- For water systems on either standard or reduced monitoring:
  1. If a sample site is not accessible (e.g. a homeowner refuses access, a safety issue exists) or the site no longer meets the requirements of a priority site (e.g., the lead service lines that served the site have been removed), a sample can be collected from another site as long as all of the following are met:
    - The site is part of the sampling pool
    - The site meets the same tier level as the inaccessible original site
    - The site is near the original inaccessible site
    - A written explanation is submitted to the Department
  2. If your sampling pool does not include an appropriate replacement sampling site, along with the sample results, the Supplier must submit a sample site change form (available at <https://www.colorado.gov/cdphe/lcr>) or submit all of the information included on the form. The information must be submitted to the Department no later than the 10<sup>th</sup> of the month following the end of the monitoring period.

### 12. What if I collect more samples than required?

- The results of all first-draw lead and copper tap samples that are collected by the Supplier or by a homeowner (for the Supplier) must be submitted to the Department. Reporting of lead and copper tap sample results must include the specific location of each site sampled and its associated tier level. The Department will evaluate submitted results to determine if they will be included in 90<sup>th</sup> percentile calculations.
- For example- A supplier is required to collect 100 lead and copper samples and the supplier sends out 120 bottles to individual homeowners. The number of samples analyzed is 112. The Supplier is required to submit all 112 results to the Department. Compliance with the lead and copper action levels will be based on the 112 samples.



- Additionally, as described above, if a sample site was sampled during the previous monitoring period, but is not sampled in the current monitoring period, the Supplier must submit an explanation (regarding each site not sampled in the current monitoring period) to the Department no later than the 10th of the month following the end of the monitoring period.

### 13. Can a lead and copper sample be invalidated by the laboratory?

No. Samples can only be invalidated by the Safe Drinking Water Program within the Department. Suppliers requesting invalidation of lead and copper sample must submit a written request for sample invalidation that includes all lead and copper tap sample results (not just those associated with the invalidation request) along with all supporting documentation for the sample(s) for which invalidation is requested. The Department has an invalidation request form available online at <https://www.colorado.gov/cdphe/lcr> or [submit all of the information on the form to the Department.](#)

### 14. What should laboratories do if they receive a sample is not 1.0 L in volume, is not a first-draw sample and/or may have been collected from an inappropriate site (i.e. not an interior tap from which water is used for human consumption or after a treatment device)?

If a laboratory receives a sample that does not appear to meet the requirements in the regulations, the laboratory should not analyze the sample and should notify the Supplier that the sample has been rejected.

### 15. What should I do if I believe that one or more of my samples should not be used in the 90th percentile calculations?

- The Supplier must submit a written sample invalidation request to the Department for any samples that it believes are not valid.
- **Decisions regarding the invalidation of samples can only be made by the Department.** Suppliers requesting invalidation of lead and copper sample must submit a written request for sample invalidation that includes all lead and copper tap sample results (not just those associated with the invalidation request) along with all supporting documentation for the sample(s) for which invalidation is requested.
- If a Supplier provides a sample bottle to a home within its compliance sampling pool (or that meets the site selection criteria and may be included in the pool), receives the sample back from the homeowner, sends the sample to a certified laboratory (or analyzes the sample itself if the system is a certified laboratory) and receives results back from the analysis, the results cannot be invalidated because the Supplier believes there were errors in sample collection.
- The Department uses the criteria included in the drinking water regulations and information included in EPA Memorandum WSG 174 in its evaluation of sample invalidation



requests. The Supplier must submit a completed sample result invalidation form (available on our website at <https://www.colorado.gov/cdphe/lcr>) or submit all of the information on the form to request invalidation of a sample. The Department will document, in writing to the Supplier, the decision regarding the invalidation request and the associated rationale for the decision.

- If samples are invalidated by the Department and as a result the Supplier does not have a sufficient number of samples to meet its minimum sampling requirement, the Supplier must collect replacement samples as soon as possible, but no later than 20 days after the date of the Department's written invalidation decision. Specific requirements for replacement samples are included in the Department's invalidation decision letters.

### 16. What if I collect less samples than required?

Failing to collect the required minimum number of samples is a violation of the regulations. Any supplier that does not collect the required number of samples will receive a violation and be required to conduct Tier 3 public notice.

The supplier must still submit the results to the Department of all first-draw lead and copper tap samples that are collected by the Supplier or by a homeowner (for the Supplier). All valid sample results taken during the monitoring period are included in the 90th percentile calculations, regardless if the supplier submits fewer samples than required.

### 17. If the monitoring period has not ended, but I have collected my required number of lead and copper tap samples and the results indicate an exceedance of the lead action level, can I collect more samples to include in the 90th percentile calculation? If so, can I collect samples from sites that were not included in the original sampling for the monitoring period?

If the monitoring period has not yet ended, additional samples can be collected with the intent of inclusion in the 90<sup>th</sup> percentile calculation in accordance with the following:

- Any additional sampling of those sites already sampled within the monitoring period must be completed within the monitoring period and either (1) include all sites with results over the action level or (2) include all sites originally sampled in that monitoring period. All results, including any resampling of high-result sites or resampling of all sites originally sampled, will be included in the 90<sup>th</sup> percentile calculation.
- If a water system wants to perform additional sampling of all sites with results over the action level or of all sites originally sampled, AND include additional sites that were not included in the original sampling, the additional sites must be included in the sampling pool AND be of equivalent tiering to those already in the sampling pool and sampled in the monitoring period thus far. The Supplier cannot add lower tier sites to the pool (and therefore include in the 90<sup>th</sup> percentile calculation) if the Supplier has a sufficient number of Tier 1 sites to meet the minimum number of sites for the sample pool.



- The Supplier must submit a sample site change form (available at <https://www.colorado.gov/cdphe/lcr>) or submit all of the information included on the form to add any sites to the sample pool. The Department strongly recommends that if a Supplier wants to add additional sites to its sample pool, the Supplier should submit the sample site change form or commensurate information as early in the monitoring period as possible and prior to collection of samples from the new sites to prevent the collection of samples from inappropriate sites that do not meet the required selection criteria.

### 18. What if the monitoring period has not ended, but I have collected my required number of lead and copper tap samples and the results do not indicate an exceedance of the lead or copper action levels. Can I collect more samples to include in the 90th percentile calculation? If so, can I collect samples from sites that were not included in the original sampling for the monitoring period?

This answer is the same as that provided for the previous question. If the monitoring period has not yet ended, water systems can collect more samples, but all of the sites originally sampled in the monitoring period must be included in the additional sampling AND the sampling must be completed within the monitoring period. If a water system wants to also include additional sites that were not included in the original sampling, the additional sites must be included in the sampling pool and be of equivalent tiering to those already in the sampling pool. If the Supplier has a sufficient number of Tier 1 sites to meet the minimum number of sites for the sample pool additional, lower level (Tier 2 or Tier 3) sites cannot be added.

The Supplier must submit a sample site change form (available at <https://www.colorado.gov/cdphe/lcr>) or submit all of the information included on the form to add any sites to the sample pool. The Department strongly recommends that if a Supplier wants to add additional sites to its sample pool, the Supplier should submit the sample site change form or commensurate information as early in the monitoring period as possible and prior to collection of samples from the new sites to prevent the collection of samples that may not be used for inclusion in the 90<sup>th</sup> percentile calculation.

### 19. Do I have to provide the results of lead and copper tap sampling to occupants of homes or buildings?

Yes. For all sites where lead and copper tap samples are collected, **as soon as practical, but no later than 30 days** of receiving each result for each site sampled, Suppliers are required to provide the individual site sample results to the occupant(s) of each home or building.

- For buildings with individual units that were tested, notification must be provided only to the occupants of the specific units that were tested.
- The notification of sample results must also include specific health impact and other information specified in the regulations - Regulation 11, 11.26(2)(g).
- The notification has be provided by mail or other Department-approved method.



- **No later than 3 months following the end of the monitoring period**, submit to the Department a sample copy of the notification that was provided to consumers **AND** a certification that the notification was distributed as specified in the regulations.

## 20. How do I handle customer-requested samples?

- **All customer requested sample results analyzed by a certified laboratory must be submitted to the Department.** Many suppliers have additional testing programs to test for lead at the request of a consumer. Since customer-requested samples are not typically collected as part of the supplier's sampling pool, the supplier may not sufficient information to determine whether the samples meet the site selection criteria. Including results from samples that do not meet the criteria could inappropriately reduce the 90th percentile value. Therefore, samples collected under these programs may not be used to calculate the 90th percentile, except in cases where the supplier is reasonably able to determine that the site selection criteria for compliance sampling is satisfied.
- If a significant number of customer-requested samples are above the lead action level, the Department may re-evaluate the supplier's corrosion control (if applicable) and/or the composition of the supplier's compliance sampling pool.
- The Department strongly encourages Suppliers to submit the results to customer-requested samples as soon as possible, but the results of customer-requested lead and copper tap samples must be submitted to the Department by the 10th of the month following the month in which the Supplier receives the results. The results submittal should include the [customer-requested sample submittal form](#) (available at <https://www.colorado.gov/cdphe/lcr> ) or must include all of the information included on the form. The Department will evaluate the result(s), the associated sample site information and will determine whether the result will be included in the Supplier's 90th percentile calculations.

## 21. Can a customer-collected sample be invalidated?

If the Supplier allows residents to perform sampling as part of the sampling pool, the system may not challenge the accuracy of the sampling results because it believes there were errors in sample collection. Suppliers are responsible for properly training the homeowners on the appropriate sampling protocol, reviewing sample containers and documentation **prior to analysis** and should not transmit samples for analysis where the container may be damaged, where samples may be collected from inappropriate sites (e.g. new plumbing, addition of a water softener) or where they believe there may be other issues with the sample collected.

## 22. Is flushing allowed before the six-hour pre-stagnation period?

There is not a maximum timeframe associated with the pre-sampling stagnation period. Pre-stagnation flushing is not recommended by the EPA and the Department has removed any references to pre-stagnation flushing from its LCR sampling guidance.



### 23. What if one of my sample sites is a vacation home that may be unoccupied for long periods of time?

First-draw tap samples collected at residential housing must be collected from the cold water kitchen sink or bathroom sink tap where the water has stood motionless in the plumbing system for at least six (6) hours. Similar to the answer to the question above, there is not a maximum timeframe associated with the pre-sampling stagnation period. Pre-stagnation flushing is not recommended by the EPA and the Department has removed any references to pre-stagnation flushing from its LCR sampling guidance.

### 24. Can a sample from a Tier 3 sample site be included in the 90th percentile if I have a sufficient number of Tier 1 or 2 sites in my sample pool?

No. All samples to be included in the 90<sup>th</sup> percentile must be identified in your sample pool or a sample site change form (available at <https://www.colorado.gov/cdphe/lcr> ) or all of the information included on the form must have been submitted for a sample site not included in the pool. Your sample pool must be completed and maintained using the tiered selection process described above. The Supplier must attempt to sample at available Tier 1 sites first, followed by Tier 2 sites, and then Tier 3 and representative sites. It is the Supplier's responsibility to identify a sample pool with the appropriate tier sites and to make every effort to sample priority sites.

### 25. Do I have to report the results of lead and copper tap samples that are collected from sites that are not in my sample pool? What if the samples are collected outside of my monitoring period?

- Yes. The results of all lead and copper tap samples collected from any site (i.e. home) within the distribution system must be submitted to the Department. The results submittal should include the customer-requested sample submittal form (available at <https://www.colorado.gov/cdphe/lcr> ) or must include all of the information included on the form.
- Samples collected outside of the monitoring period or above the minimum required number for the monitoring period are considered “additional” per the regulations.
- For samples collected outside of the monitoring period, the Department strongly encourages Suppliers to submit the results of samples collected outside of the monitoring period as soon as possible, but the results of these additional lead and copper tap samples must be submitted to the Department by the 10th of the month following the month in which the Supplier receives the results.
- For samples collected within the monitoring period, but are above the minimum number of samples required, the results of these additional lead and copper tap samples must be submitted to the Department by the 10th of the month following the end of the monitoring period.



- For samples collected within the monitoring period, but from sites not included in the sample pool on record, the Department will evaluate the result(s), the associated sample site information and will determine whether the result will be included in the Supplier's 90th percentile calculations. If the Department determines that the result(s) will be included in the calculations, the Supplier may be required to add the site(s) to its sampling pool.

## 26. I just installed corrosion control treatment and want to collect “process control samples” from sites (i.e. homes or buildings) within the distribution system to assess the treatment’s effectiveness. Do I have to report the results of those samples to the Department?

Yes. The results of all lead and copper tap samples analyzed by a certified laboratory and collected from any site (i.e. home or building) within the distribution system must be submitted to the Department. The results submittal should include the customer-requested sample submittal form (available at <https://www.colorado.gov/cdphe/lcr> ) or must include all of the information included on the form.

## 27. Are there any circumstances related to homeowner treatment or plumbing when a Supplier should no longer sample at an identified sample site?

A Supplier should no longer sample from a sample site if the customer has installed either a point-of-use or point-of-entry treatment device designed to remove inorganic contaminants. The rule specifically states that sampling sites must not include faucets that have point-of-use or point-of-entry treatment devices designed to remove inorganic contaminants. If the customer has completed recent plumbing work, the scope of the work must be evaluated to determine if the sample site is still in the designated tier level (e.g. removal of lead service line, or replacement of copper pipe without lead solder). If the Supplier needs to remove a sample site from its sampling pool due to homeowner treatment or plumbing, the Supplier must submit a sample site change form (available at <https://www.colorado.gov/cdphe/lcr>) or submit all of the information included on the form.

## **Sampling Frequency**

### 28. How do I know when I am supposed to collect lead and copper tap samples?

The Department communicates monitoring (i.e. sampling) requirements to the Administrative Contact and certified operator(s) in responsible charge (ORCs) in writing and also posts [monitoring schedules](https://wqcdcompliance.com/schedules) on our website at <https://wqcdcompliance.com/schedules> for all public water systems.

### 29. Can my required monitoring frequency for lead and copper change?

- Yes. When a water system has an exceedance of the lead action level, if the system is on a reduced schedule (i.e. annual or three-year) the Department will increase the minimum monitoring frequency to standard (six-month). The Department may also increase monitoring frequency where there has been a source change or a long-term treatment



change. Monitoring changes due to source and/or long-term treatment changes are discussed further in the section below.

- Requests for reducing your sampling schedule must be made in writing and should include supporting justification that addresses sample results, existing sources and treatment and planned source changes and long-term treatment changes. The Department strongly encourages Suppliers to submit complete requests for all schedule reductions (including those situations allowed in the regulations for Suppliers to self-reduce) prior to making any changes to its sampling schedule. This will help with coordination between the Supplier and the Department and will also prevent Suppliers from unnecessarily incurring monitoring violations resulting from schedule reductions for which the Department ultimately determines a Supplier is not eligible.

### 30. Are there base considerations that the Department will utilize in determining monitoring frequency changes under the LCR?

Yes.

- Reduced (anything other than standard, six-month) monitoring frequency will not be considered:
  - Under any circumstance where it is not allowed per the regulations and/or where a certain, applicable monitoring frequency is specified in the regulations (e.g. following an ALE, etc).
  - For a system that has received more than one failure-to-monitor or failure-to-report violation for any LCR sampling in the last three (3) years.
- The three-year reduced monitoring frequency will typically not be considered:
  - For a system that receives a failure-to-monitor or failure-to-report violation for any LCR sampling in the most recent three (3) year period.
- The three-year reduced monitoring frequency will typically not be considered:
  - For systems that seasonally change source water and where the source water can have different corrosive effects on plumbing
  - When a system's representative locations can experience different water qualities at different times per year - based on changing in water plant usage or source waters.
  - If a consecutive system receives differing water qualities from differing suppliers throughout the year.

## **New source or long-term change in water treatment**

### 31. What does the department consider a long-term change in water treatment or a new source?

- The Department may increase monitoring frequency where there has been a source change or a long-term treatment change (see items 6.1 and 6.2 in the [March 2016 EPA Optimal Corrosion Control Treatment Evaluation Technical Recommendations for Primacy Agencies and Public Water Systems](#) for information on source and treatment changes) that



impacts the water that a water system serves - including changes in water that a system purchases from another public water system (i.e. integrated systems, consecutive systems and other buy-sell arrangements) or where a water system changes the utilization for a source already in its inventory from 'Emergency' to 'Permanent', 'Seasonal' or 'Interim'.

- The Department has updated the [design review matrix](#) (an appendix to the Design Criteria for Potable Water Systems). In the matrix, the department has provided specific information about which source and treatment changes will require a lead and copper review by the department. See the next question for steps to take when a lead and copper review is triggered.

### 32. When a source or treatment change occurs that requires a lead and copper rule evaluation, what steps will the Suppliers be required to take?

Generally, making a source or long-term treatment change will require increased sampling. However, there are also cases where additional actions will be required. Refer to the steps below for general guidance if a review is triggered:

- Step 1: Does the system have existing lead and copper required treatment targets (e.g. pH, alkalinity, phosphate levels - also called FANLs) or is the population >50K -
  - Yes - go to Step 2
  - No - go to Step 3
- Step 2: As part of the application for design approval - require system to submit an analysis of the change and how it will effect corrosion in distribution (Example template under development).
  - Once the department has completed the evaluation, the department will ether:
    - Require corrosion control studies as appropriate, or
    - Adjust Optimum Corrosion Control Technology (OCCT) delegation as appropriate
      - Department will also modify or set water quality parameters (FANLs)
- Step 3: Department will increase monitoring to every 6 months for:
  - Lead and copper tap sample monitoring
  - Water quality parameter (WQP) monitoring for systems that completed Step 2 above