

**CONTAMINANTS OF CONCERN:**  
Managing Lead and Manganese

**WEBINAR SERIES**

May 12th, 2020 | 1:00 - 2:30p.m (Mountain)  
An Experiment in Environmental Leadership:  
Denver Water Variance Experience

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## WEBINAR MODERATOR



**Craig McGonagill**  
**Engineering Senior Specialist**  
**Denver Water**

Craig McGonagill has been working in the public utility sector since 2007. In 2014 he joined Denver Water and has worked in a variety of water quality roles. Currently he is an engineering senior specialist with the Start-Up, Commissioning, and Optimization team. He was involved in the design and implementation of Denver Water's customer lead sampling program and has played several support roles in what has become Denver Water's Lead Reduction Program.

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## PANEL OF EXPERTS



**Nicole Poncelet-Johnson**  
Director Water Quality &  
Treatment  
Denver Water



**Tyson Ingels**  
Lead Drinking Water  
Engineer  
Colorado Department of  
Public Health &  
Environment



**Chris Corwin**  
Water Process Engineer  
Corona Environmental  
Consulting, LLC



**Chad Seidel**  
President  
Corona Environmental  
Consulting, LLC

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## AGENDA

- I. **Denver Water's Pursuit of a Variance to the LCR Rather Than Accept Orthophosphate as OCCT** - *Nicole Poncelet-Johnson / Tyson Ingels*
- II. **What we have Learned with Four Years of Pilot Studies on Harvested Lead Service Lines and Coupon Studies under Identical Conditions** - *Chris Corwin*
- III. **A population Weighted Lead Exposure Model to Determine Equivalence between OCCT and the Requested Variance** - *Chad Seidel*

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# ENVIRONMENTAL LEADERSHIP

## THE DENVER WATER LEAD REDUCTION PROGRAM PLAN & VARIANCE

Tyson Ingels, PE, CWP  
Lead Drinking Water Engineer



Nicole Poncelet-Johnson, PE, CWP  
Director Water Quality & Treatment




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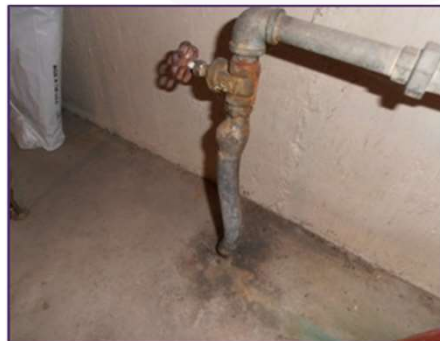
# REGULATORY HISTORY



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## LEAD IN DRINKING WATER

- Lead is typically from the corrosion of drinking water service lines and household plumbing materials.
- Lead not present in Colorado drinking water sources like rivers or groundwater.
- Lead service lines were commonly installed in Denver until about 1950.
- Lead solder was used in household plumbing until 1987.



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## LEAD AND COPPER RULE

- State follows federal rule closely.
- Rule is very prescriptive.
- Challenging rule due to complicated water chemistry.
- Requires two key items:
  - Monitor for lead and copper inside homes - test plumbing.
  - Use optimal corrosion control treatment (OCCT).

### Optimal Corrosion Control Treatment (OCCT) Defined:

means corrosion control treatment that minimizes the lead and copper concentrations at consumers' taps while ensuring that the treatment does not cause the water system to violate any provision of the *Colorado Primary Drinking Water Regulations*



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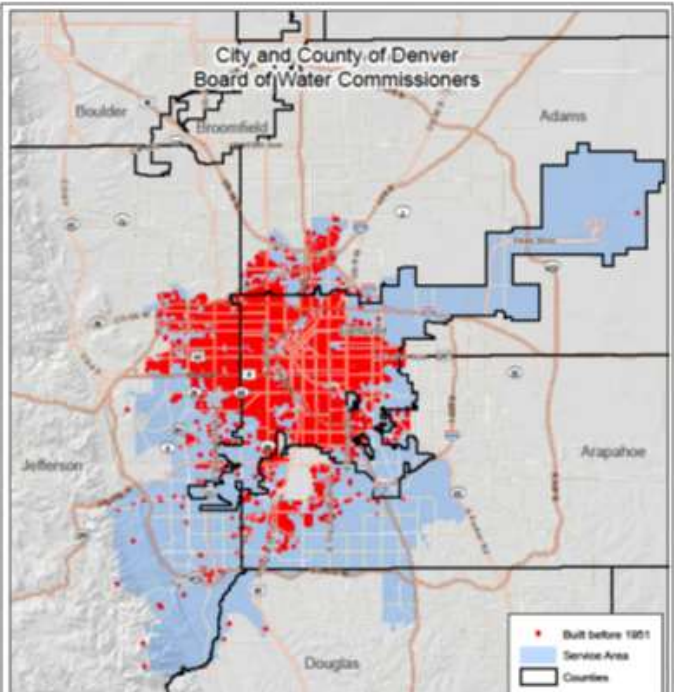
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## DENVER WATER SERVICE AREA

- Homes in service area that were built before 1951 are more likely to have lead service lines
- Approx 64,000 Lead Service Lines






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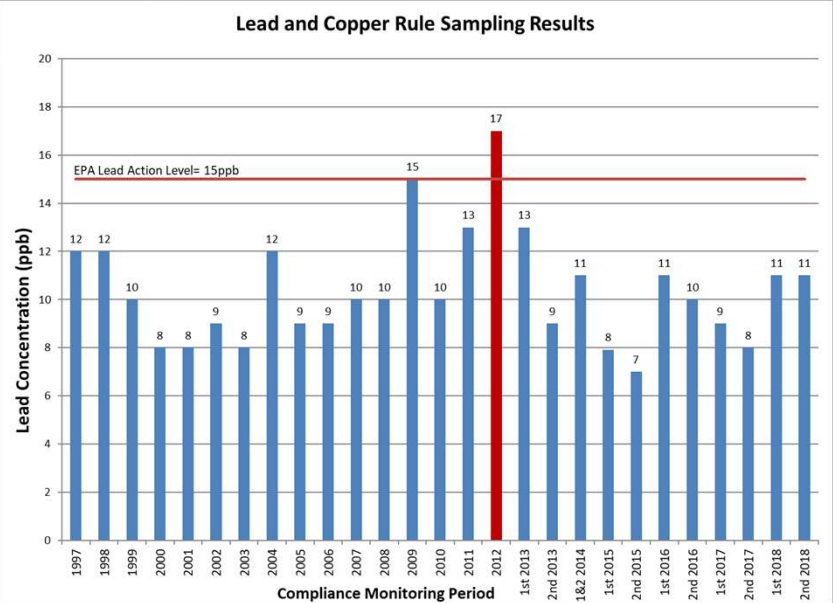
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## DENVER WATER LEAD AND COPPER RULE COMPLIANCE

- 2012 – action level exceedance
- CDPHE began implementing steps from the Lead and Copper rule
- CDPHE required Denver Water to perform Corrosion Control Studies




### Lead and Copper Rule Sampling Results



Year	Lead Concentration (ppb)
1997	12
1998	12
1999	10
2000	8
2001	8
2002	9
2003	8
2004	12
2005	9
2006	9
2007	10
2008	10
2009	15
2010	10
2011	13
2012	17
1st 2013	13
2nd 2013	9
1&2 2014	11
1st 2015	8
2nd 2015	7
1st 2016	11
2nd 2016	10
1st 2017	9
2nd 2017	8
1st 2018	11
2nd 2018	11

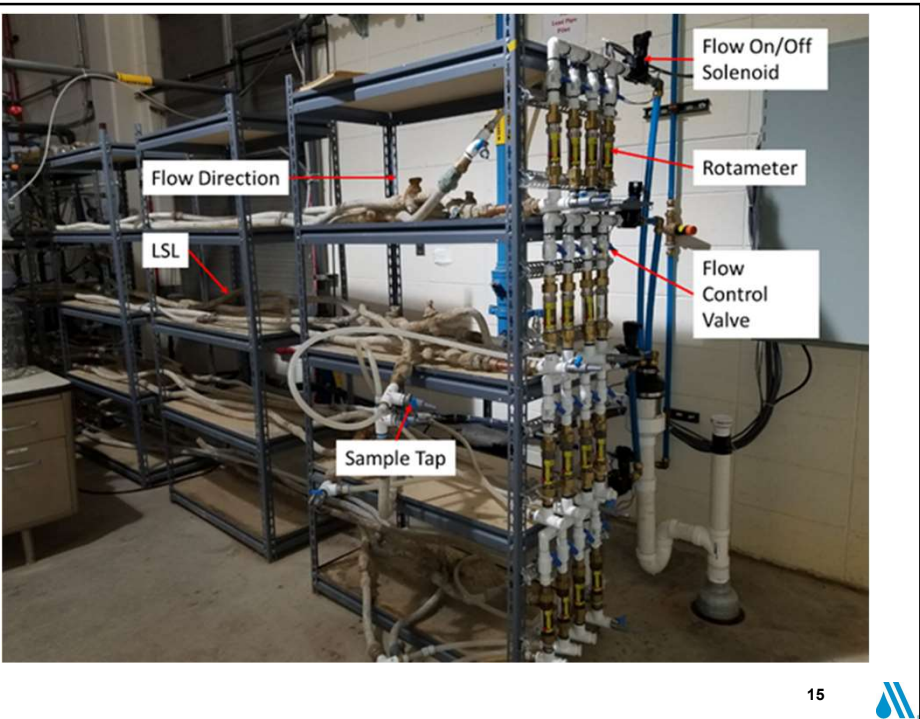
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## CORROSION CONTROL STUDY

- 2012 - Exceeded Action Level for lead
- 2013 - Preliminary OCCT Bench Top Analysis
- 2014 – Pilot Protocol approved by CDPHE
- 2015 – Pilot started up at Marston WTP
- 2016 – Pilot started up at Moffat WTP

## CORROSION CONTROL STUDY RESULTS SHOWING LEAD REDUCTION PERCENTAGE – SUBMITTED TO STATE IN 2017

Pilot Plant Location	pH 8.8	Orthophosphate
<b>Marston Treatment Plant</b> (representing 80% of Denver Water’s supply)	Median Reduction: 35% to 51%*	Median Reduction: 66% to 72%*
<b>Moffat Treatment Plant</b> (representing 20% of Denver Water’s supply)	Median Reduction: 57% to 72%*	Median Reduction: 64% to 81%*





## CORROSION CONTROL TREATMENT DESIGNATION

- **CDPHE Designated Orthophosphate as OCCT - March 20, 2018:**
  - Denver Water recommended pH/alkalinity adjustment
- **Construct and implement orthophosphate treatment by March 20, 2020.**
  - Violation if OCCT is not in operation



Marston's Lead Pipe Study, one of our two ongoing treatment pilots.



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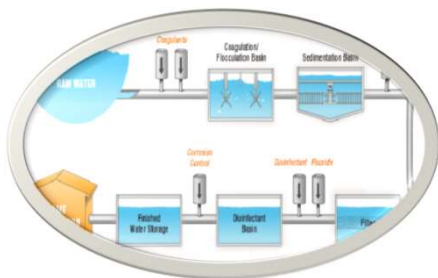
# INNOVATIVE SOLUTION



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## DENVER WATER'S COMMITMENT TO PUBLIC HEALTH & THE ENVIRONMENT

Protecting Public Health  
 1.4 Million People



Protecting Water Supplies  
 Wildfire, drought, nutrients, mine drainage



Can we find a solution that supports both SDWA and CWA goals?

## ALTERNATIVE EARLY INVESTIGATIONS

“What if happens if we combine mitigation strategies?”

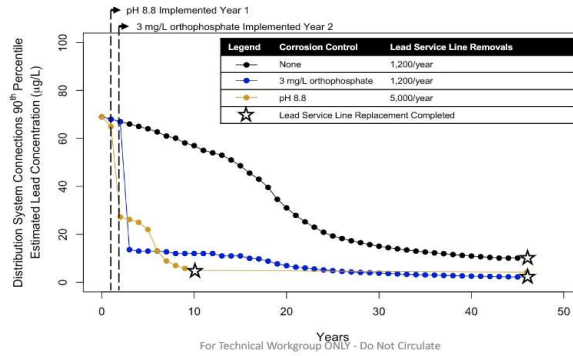
8.8 pH/alkalinity CCT  
 + 7% Lead Service Line Replacement  
 = Equivalent to orthophosphate OCCT?

Premise ID	Ortho vs. Variance (Full LSLR + COE + pH/Alk)			
	Current	Ortho	Variance	Variance
	1st Draw Prior to Treatment (HD)	80% Ortho	Full LSLR* + COE* + 40% pH/Alk	Full LSLR* + COE* + 65% pH/Alk
Home 1	5	1.0	0.1	0.1
Home 2	9	1.8	0.0	0.0
Home 3	30	6.0	0.6	0.4
Home 4	8	1.6	0.0	0.0
Home 5	2	0.4	0.0	0.0
Home 6	3.5	0.7	0.0	0.0
Average	9.6	1.9	0.1	0.1
Median	6.5	1.3	0	0

## EARLY MODELING OF EQUIVALENCY

“Is this alternative better for public health?”

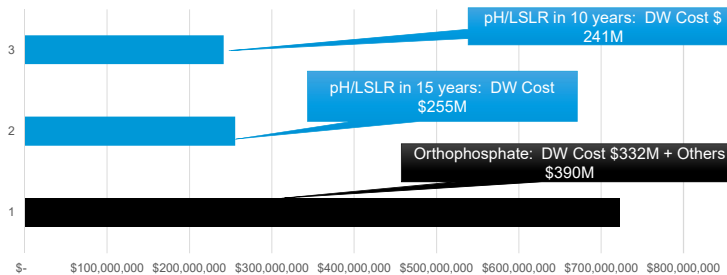
Distribution System Connections 90<sup>th</sup> Percentile  
 Model Estimated Lead Concentration (µg/L)



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## EARLY ESTIMATE OF CAPITAL COST IMPACTS

“What does it cost and who pays?”



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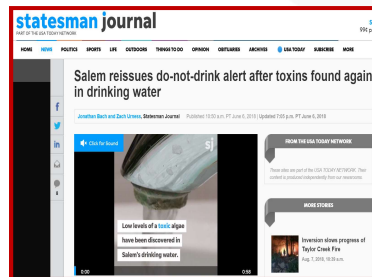


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## BUILDING INTERNAL CASE – MID 2018

### Pros and Cons of OCCT

- + Best treatment option to reduce lead levels (
- + Relatively low cost to Denver Water
- Estimate a significant cost to regional water entities
- Regional phosphorus levels go up in dry and arid climate.
  - Consecutive water systems (ripple effect)
  - Stormwater: improvements to remove phosphorus
  - Regional WWTP: improvements to remove phosphorus
  - Regional reservoirs and streams impacted
    - Algae: reservoir treatment, drinking water treatment, customer complaints, environmental impacts



### Pros and Cons of pH adjustment and Lead Service Line Removal

- + Good treatment option to reduce lead levels
- + Removal of lead service lines creates significant and permanent reductions in lead levels.
- + Mitigates additional phosphorus loading on watershed
- Estimate a significant cost to Denver Water rate payers



## MOU REGIONAL STAKEHOLDERS

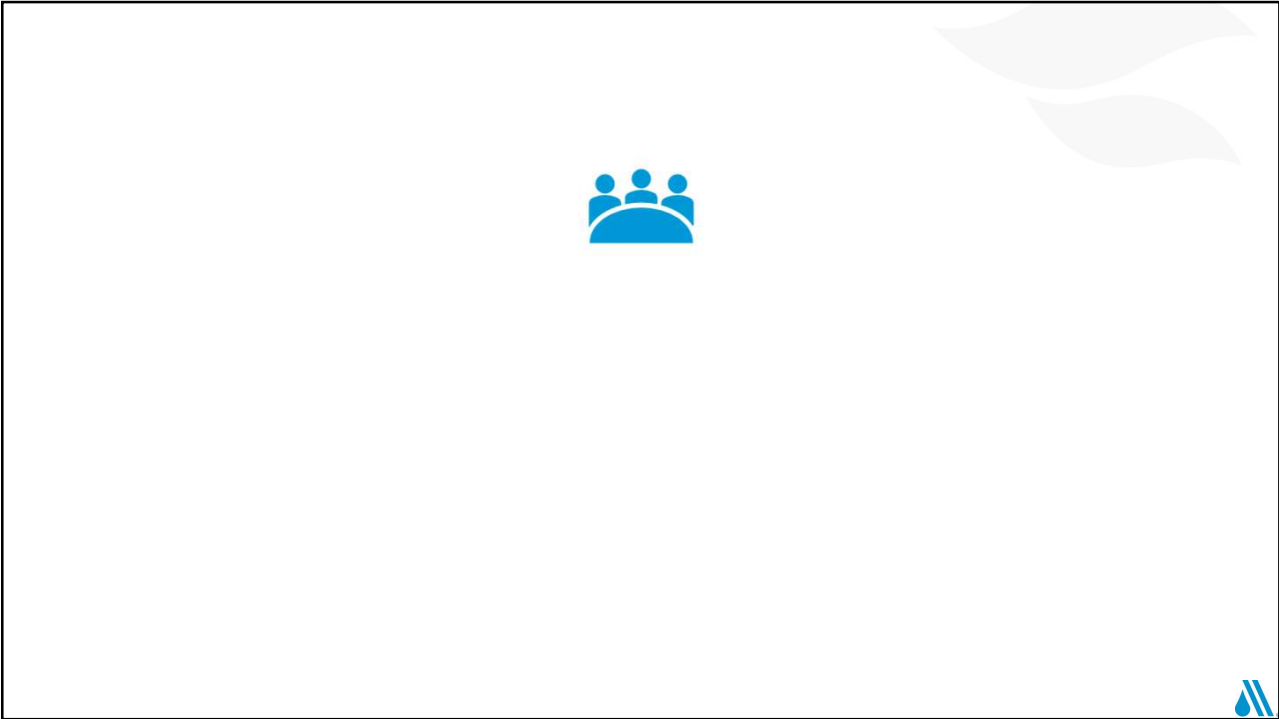


### Denver Water OCCT MOU Leadership Meeting

#### **Collective description of success for the stakeholder process**

MOU Stakeholders will collaboratively seek **long-range regional solutions** that **maintain public trust** and **protect public health and the environment** per the Safe Drinking Water Act and the Clean Water Act, while additionally **minimizing impacts to water supplies, wastewater treatment plants and watersheds.**





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### ADDITIONAL RESEARCH: LEAD FROM SERVICE LINES

**Lead Lines**

**Copper Lines**


**DENVER WATER**

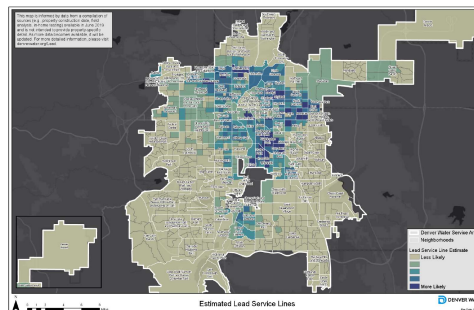
“Where is the lead coming from?”

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## ADDITIONAL RESEARCH: LEAD SERVICE LINE INVENTORY

- Age of home < 1951
- Potholing
- WQ Sampling – 3 bottle test
- Internal Records

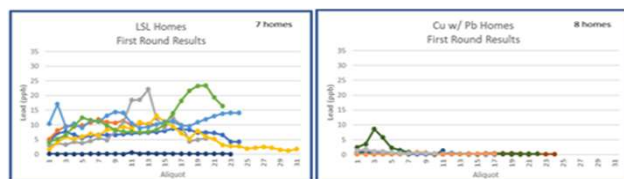


“Where is it located?”

## NEGOTIATIONS AND RESEARCH INTERSECT

“How do we protect customers who won’t have their service line replaced in year one?”

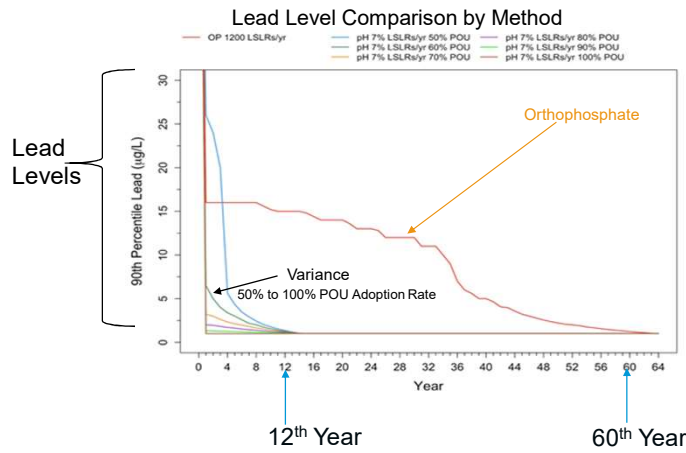
8.8 pH/alkalinity adjustment  
+ 7% Lead Service Line Replacement  
+ **Filters (NSF 53)**  
= Equivalent Public Health Protection ?





## ADVANCED MODELING

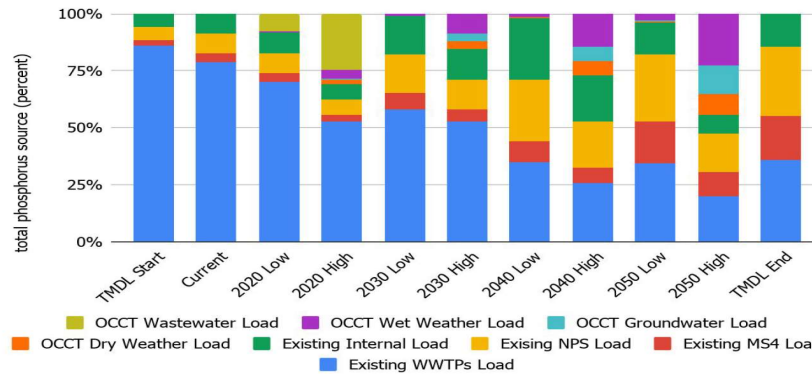
- Combine LSLR, pH adjustment, filter adoption
- Achieves lowest lead levels in **15 years vs. 60 years**



## STAKEHOLDER RESEARCH: NUTRIENT LOADING TO WATERSHED\*

40% of all water used for irrigation

FIGURE 2.4 RELATIVE CONTRIBUTION OF OCCT PHOSPHORUS LOADS FROM 2 MG/L ORTHOPHOSPHATE DOSE FOR LOW AND HIGH SCENARIOS COMPARED TO BARR-MILTON TMDL



\*Source: Watershed & Wastewater Stakeholder Summary Report, CDPHE, September 2019



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## STAKEHOLDER RESEARCH: POTENTIAL IMPACTS OF ORTHOPHOSPHATE

- Harmful algal blooms
- Changes in dissolved oxygen or pH (eutrophication) that could impact aquatic life
- Reduced water clarity
- Alteration of the aquatic food web
- Reduced biodiversity
- Decreased recreational and tourism opportunities that could result in economic impacts
- Changes to reservoir management and operations
- Increased treatment at drinking water facilities due to lower quality
- Impacts to diversion structures

Source: Watershed & Wastewater Stakeholder Summary Report, CDPHE, September 2019



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## STAKEHOLDER RESEARCH LIFE CYCLE COST COMPARISON

Assumption	Orthophosphate (at 2 mg/L as PO <sub>4</sub> )	Variance
Excluding Existing Service Line Replacement Efforts	\$322M to \$506M	\$265M to \$362M
Including Existing Service Line Replacement Efforts	\$376M to \$582M	\$319M to \$439M



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## VARIANCE COMMITMENTS

- Denver Water submitted treatment technique variance to the Safe Drinking Water Act for Optimal Corrosion Control Treatment:
  - pH corrosion control treatment
    - Going from 7.8 s.u to 8.8 s.u.
  - Accelerated lead service line removal – no charge
    - Going from 1,200 lines/yr to 4,500 lines/yr
  - Pitcher filters for all customers with lead service lines – no charge
  - Development of lead service line inventory
  - Communication, outreach, and education

<https://www.denverwater.org/your-water/water-quality/lead>



## LEAD REDUCTION PROGRAM (VARIANCE) BENEFITS



**Protects Future Generations**  
 The Lead Reduction Program permanently removes the largest source of lead within 15 years through accelerated lead service line replacement versus more than 50 years of using orthophosphate.



**Focuses on Health Equity and Environmental Justice**  
 The components of the Lead Reduction Program provide equal access for everyone to benefit from reducing overall lead exposure.



**Provides Better Water Quality**  
 For customers with lead service lines, Denver Water will provide filters that reduce lead by 97% until their lead service line can be replaced.



**Creates a Regional Solution**  
 The Lead Reduction Program prevents additional phosphorous loading at regional wastewater treatment plants, which is costly to remove.



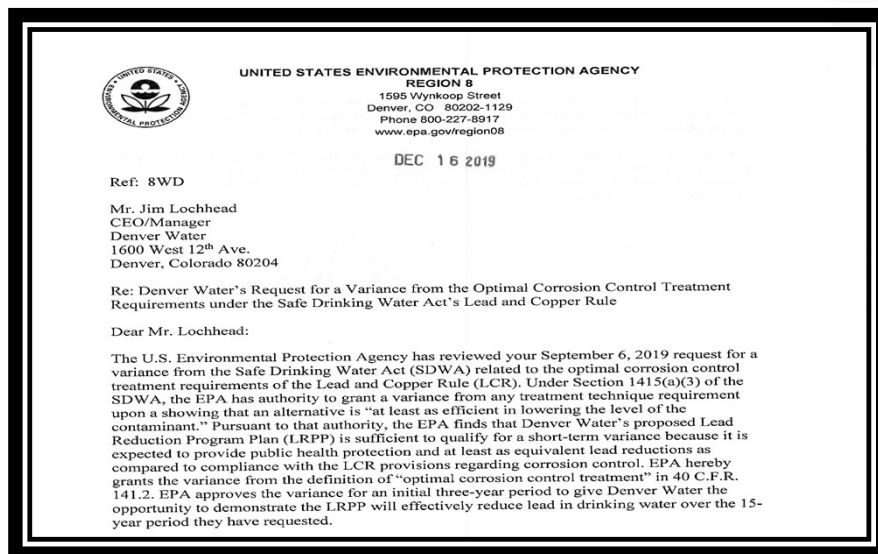
**Protects Infants and Children**  
 The Lead Reduction Program prioritizes filter distribution and lead service line replacement in areas at greatest risk to lead exposure, namely areas with young families, child care providers and schools.



**Protects Environmental Health**  
 Upon implementation, the Lead Reduction Program will prevent introduction of a new source of phosphorous into reservoirs, rivers and streams. Nutrients can impair water for aquatic life as well as downstream wastewater and water utilities.



## APPROVED BY EPA 12.16.19



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## ACKNOWLEDGEMENTS



USEPA OW and HQ  
EPA Region 8  
Colorado Department of Public Health & Environment (CDPHE)  
Metro Wastewater  
Greenway Foundation  
Aurora Water  
Corona Environmental  
Mott MacDonald  
AECOM  
Denver Water Board, Executives and highly dedicated staff  
Numerous CDPHE stakeholders, advocacy groups and supporters



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## WHAT WE LEARNED FROM PILOT STUDIES ON HARVESTED LEAD SERVICE LINE AND COUPON STUDIES UNDER SIMILAR CONDITIONS


Chris Corwin, Ph.D., P.E.  
Water Process Engineer  
Corona Environmental Consulting, LLC

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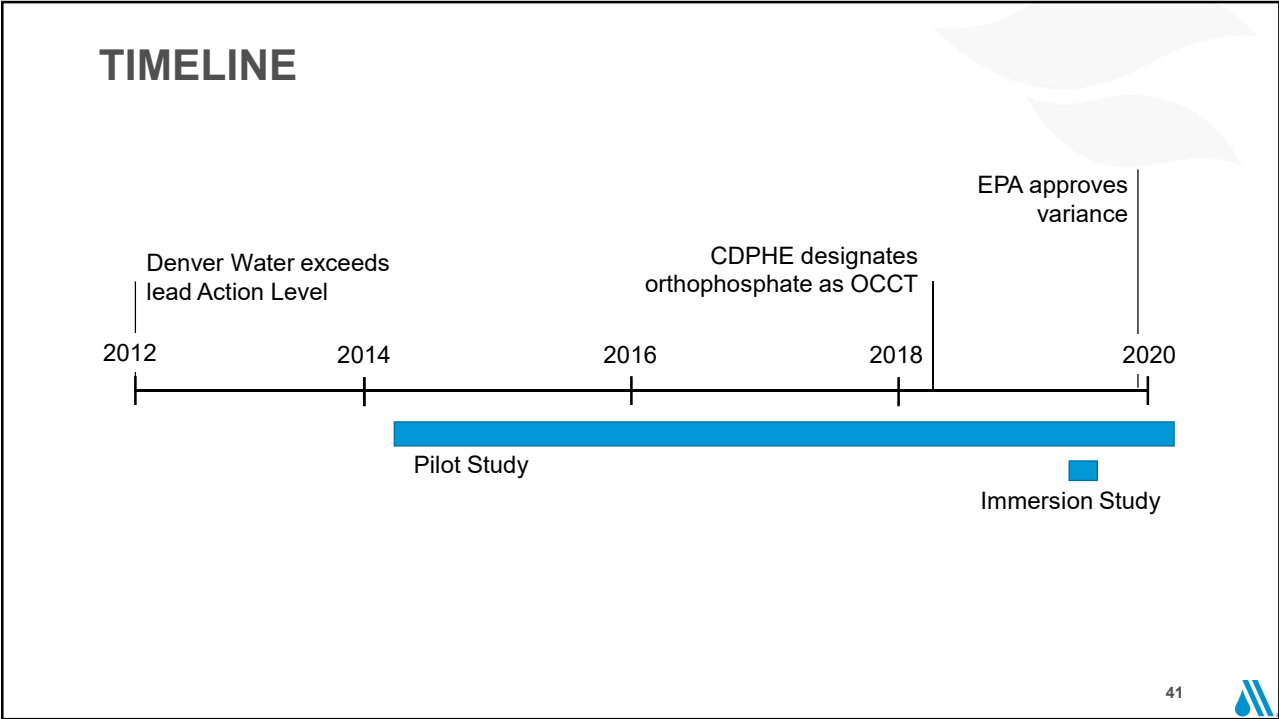
## INTRODUCTION

- Denver Water made decision to pursue variance
- Variance relies on determination of “as efficient as”
- Performed research to gather necessary data
  - 4 year pilot
  - 17 week immersion (coupon) study

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## PILOT DESIGN

- Pilot rigs were built at two surface water plants representing the two primary water qualities
- Rack were automated to perform 3 cycles of flush/stagnate/sample each day
- Stagnation period was 5 hours
- Stabilization period before

Rack	Condition	Chem. Add	pH	# Replicates
1	Control	None	~7.8	3
2	Ortho	1, 2, 3 mg/L PO <sub>4</sub>	7.8	3
<del>3</del>	<del>Silica</del>	<del>Si</del>	<del>7.8</del>	<del>3</del>
4	pH	NaOH	8.8, 9.2	3

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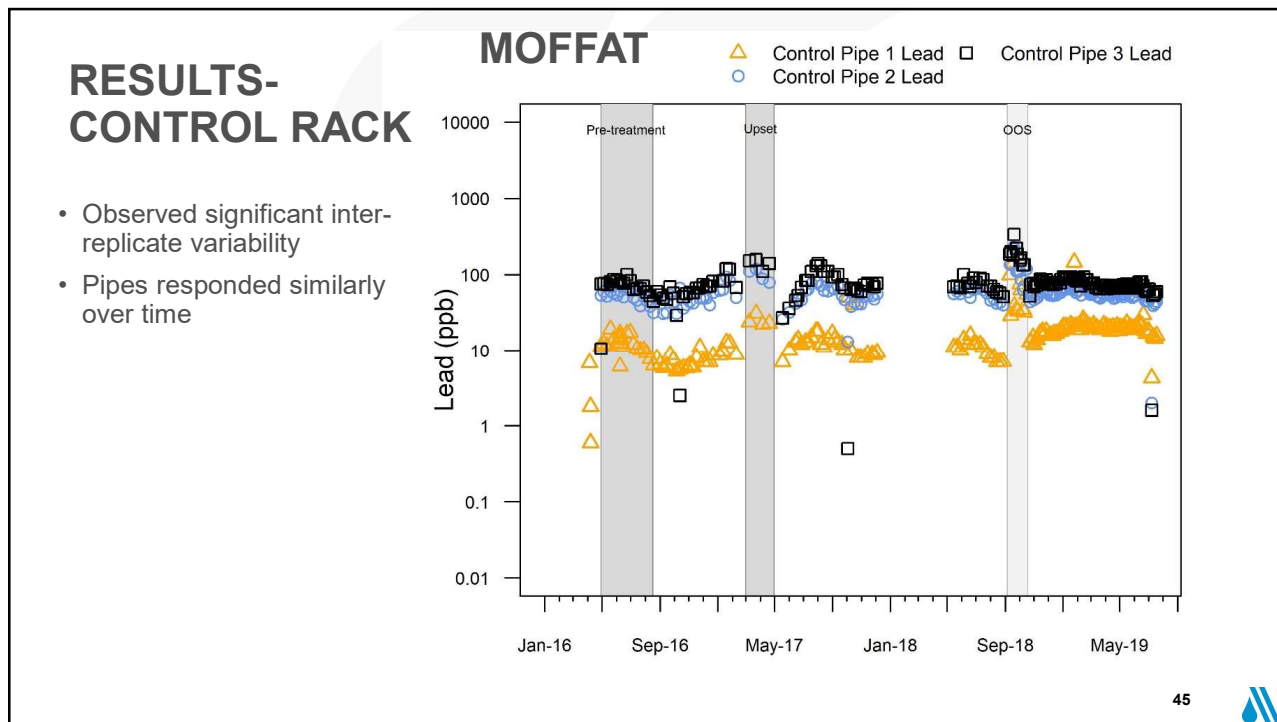
## TREATED WATER QUALITY

Parameter	Marston Influent Avg. (range)	Moffat Influent Avg. (range)
Temperature (°C)	13 (4-25)	12 (5-21)
pH	7.8 (7.4-9.1)	7.8 (7.2-8.3)
Alkalinity (mg/L as CaCO <sub>3</sub> )	64 (36-83)	39 (14-70)
Calcium (mg/L)	30 (7-41)	16 (1-36)
Magnesium (mg/L)	8.0 (1.7-10.8)	2.9 (0.3-9.2)
Conductivity (µS/cm)	325 (35-450)	152 (92-330)
Total Chlorine (mg/L)	1.34 (0.03-8.00)	1.40 (0.12-1.78)

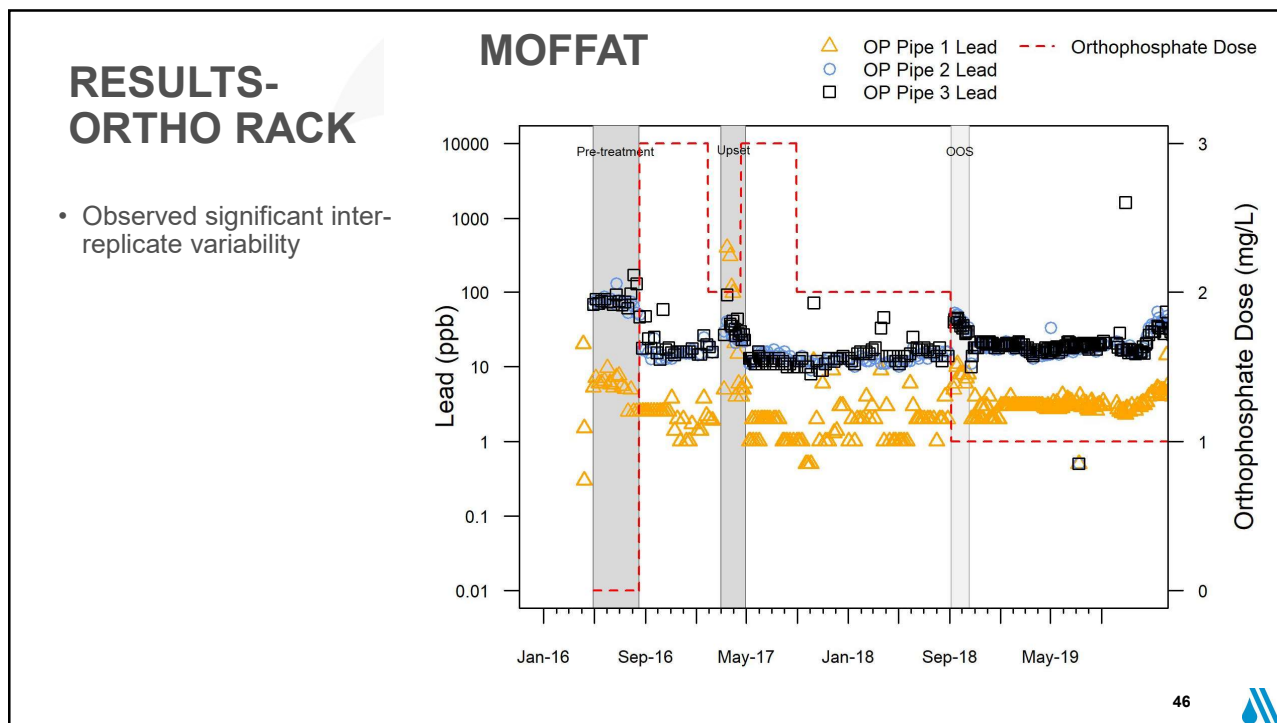
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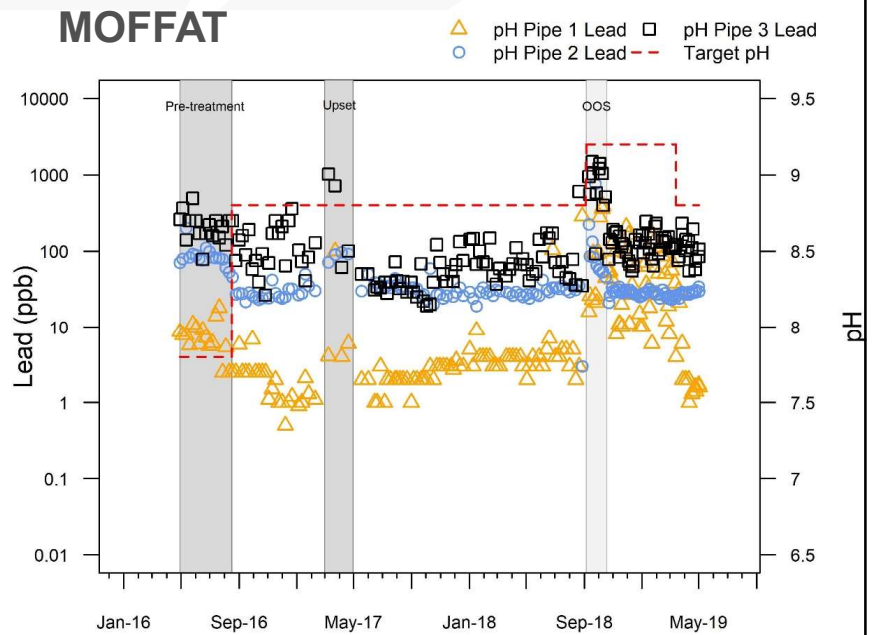
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## RESULTS- PH RACK

- Observed significant inter-replicate variability
- Pipes 1 & 3 showed much more variability than others
- What is a factor of pH or just of the individual pipes assigned to Rack 4?



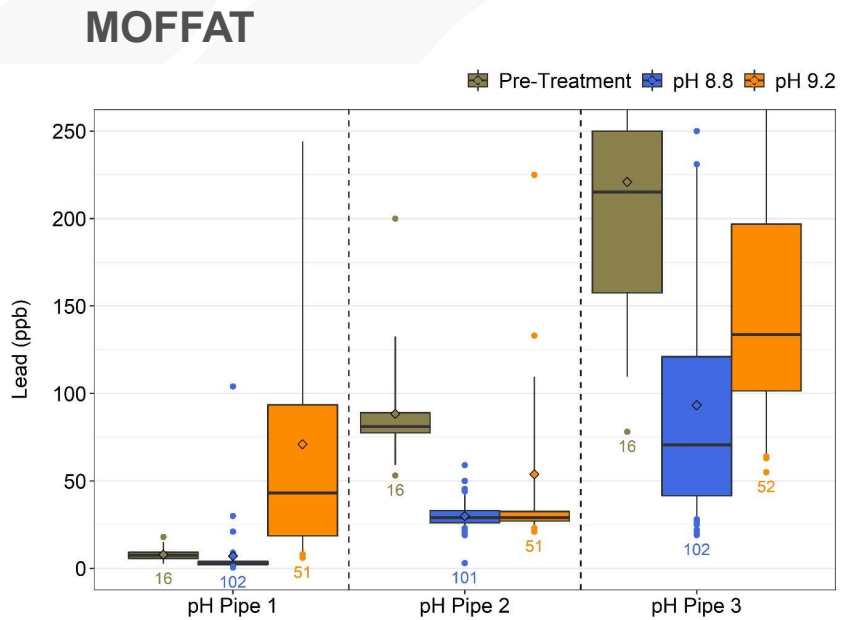
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## VARIABILITY- PH

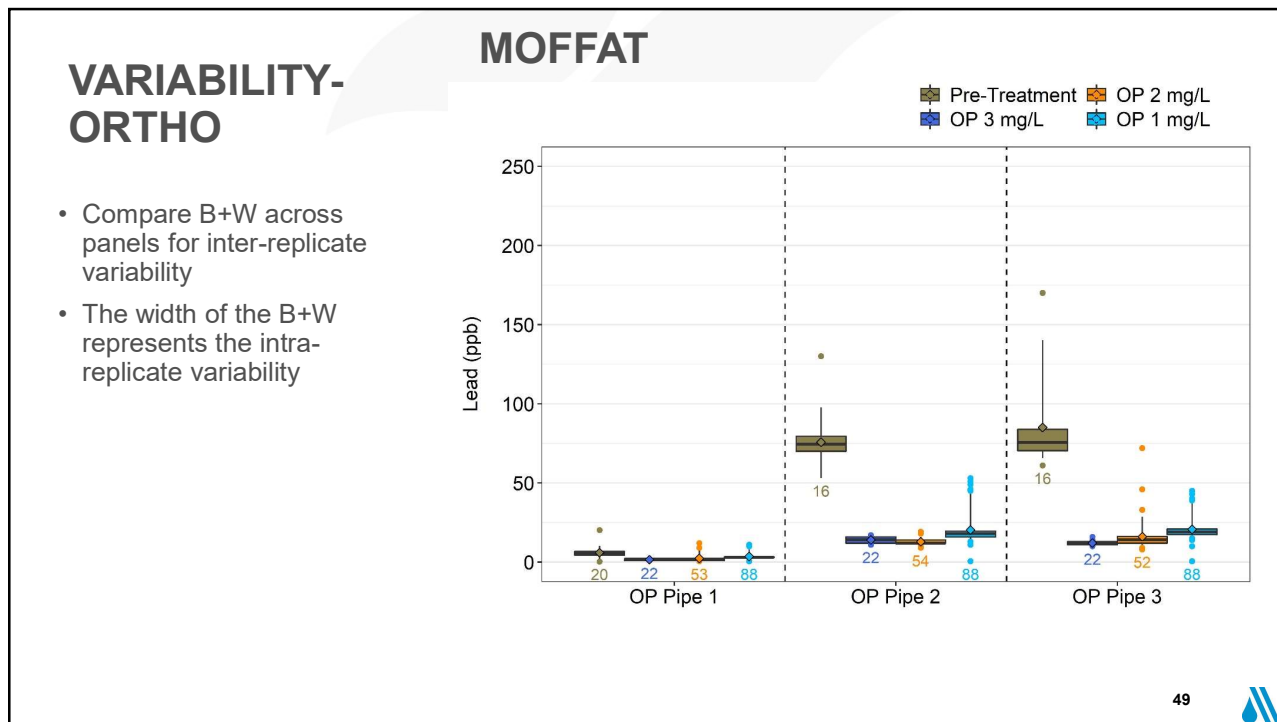
- Compare B+W across panels for inter-replicate variability
- The width of the B+W represents the intra-replicate variability



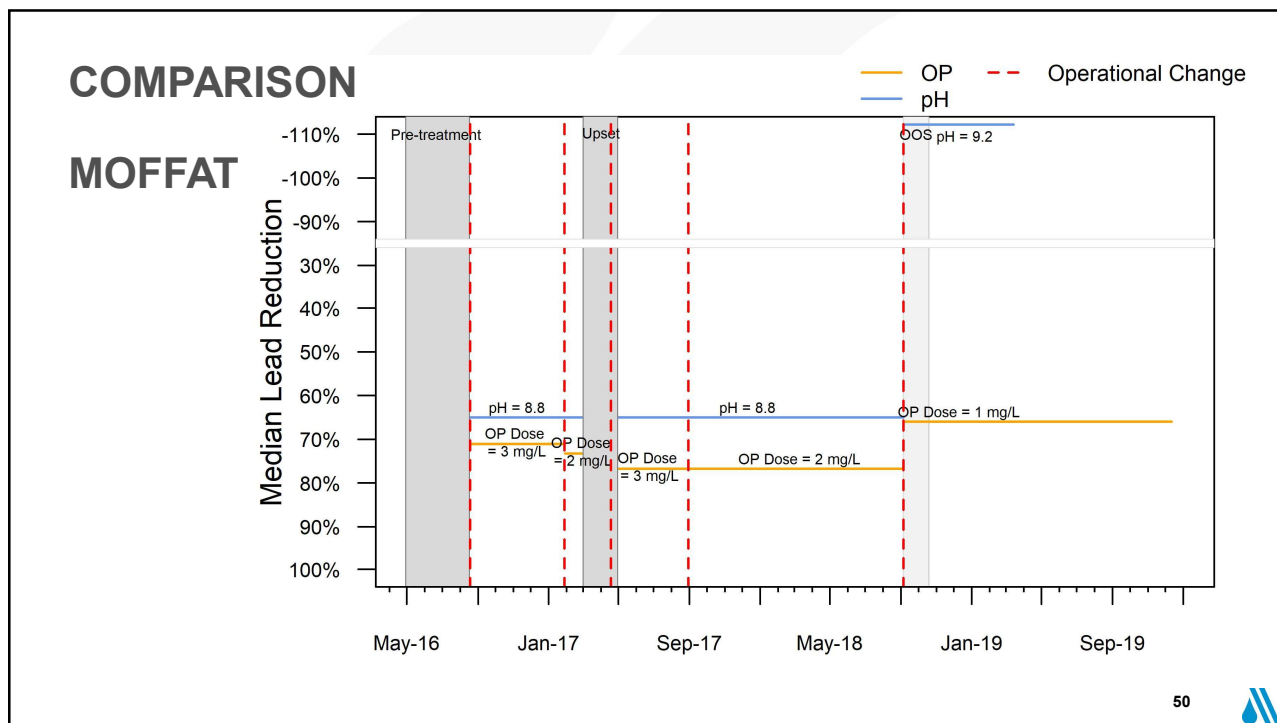
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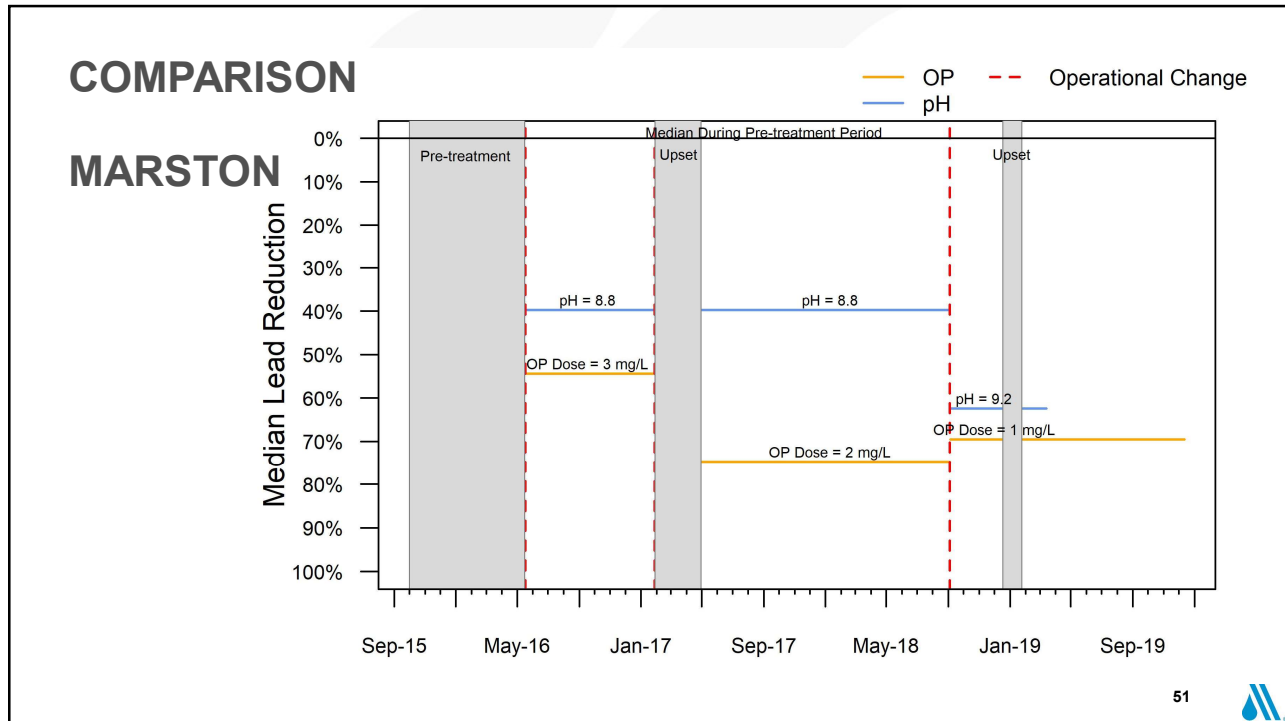
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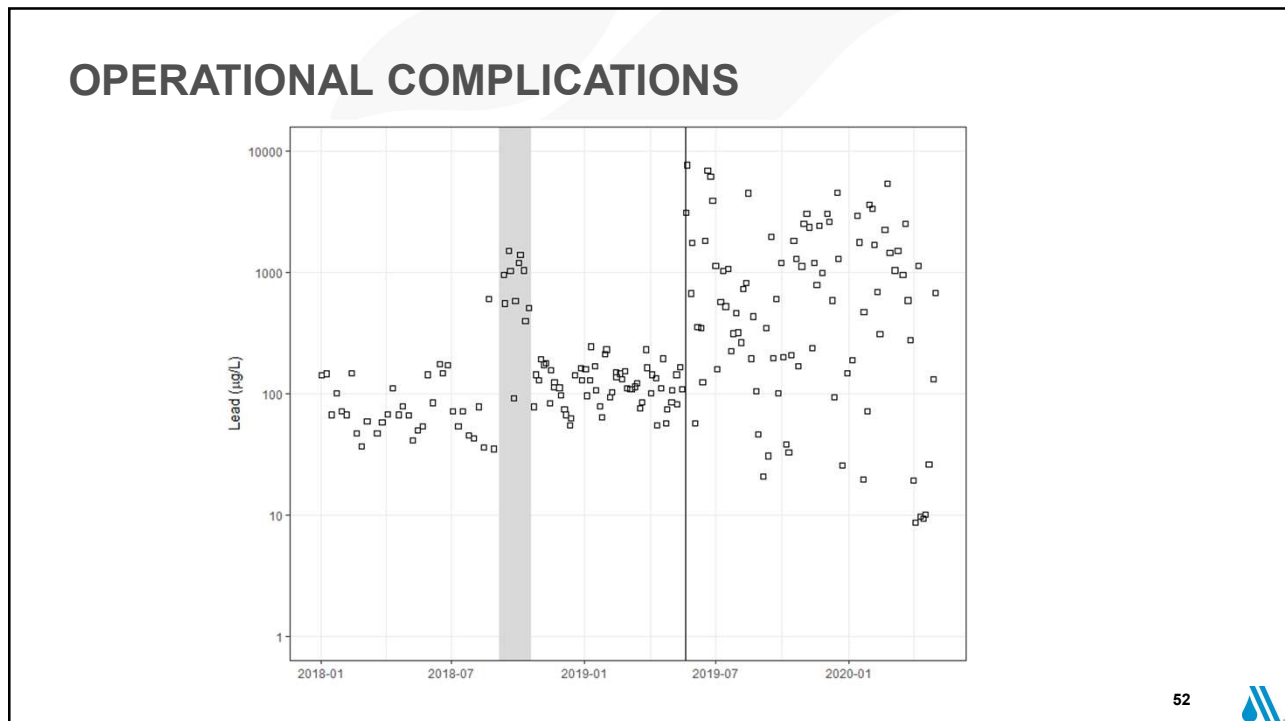
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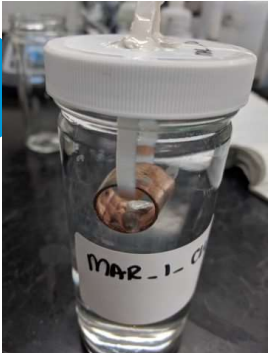


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## IMMERSION RESULTS

CONTROLLING LEAD RELEASE FROM LEAD SOLDER


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## COUPON DESIGN – COPPER W/ LEAD SOLDER

- New copper pipe segments with weighed out 50:50 Lead/Tin solder
- 6 weeks of conditioning (no treatment), 11 weeks of treatment
- 3 water changes per week, with composite sample analyzed each week

Jars	Condition	Chem. Add	pH	# Replicates
1	Control	None	7.8	3
2	Ortho	2 mg/L PO <sub>4</sub>	7.8	3
3	pH	NaOH	8.8	3

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## TREATED WATER QUALITY

Parameter	Marston Influent	Moffat Influent
pH	7.8	7.8
Alkalinity (mg/L as CaCO <sub>3</sub> )	61.2	39.9
Calcium (mg/L)	34.5	17.8
Magnesium (mg/L)	8.6	2.0
Chloride (mg/L)	26.4	3.7
Sulfate (mg/L)	65.0	17.9
Sodium (mg/L)	17.0	2.8
Conductivity (µS/cm)	362	139
CSMR	0.41	0.21

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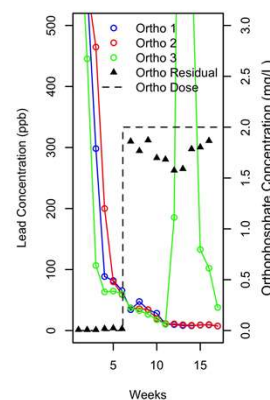
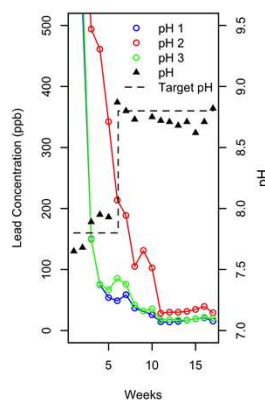
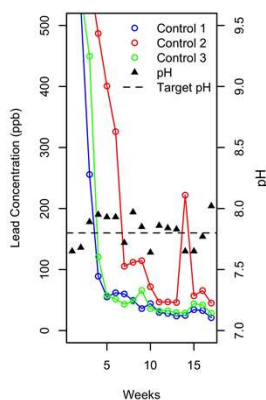


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## RESULTS-TIME SERIES

### MARSTON

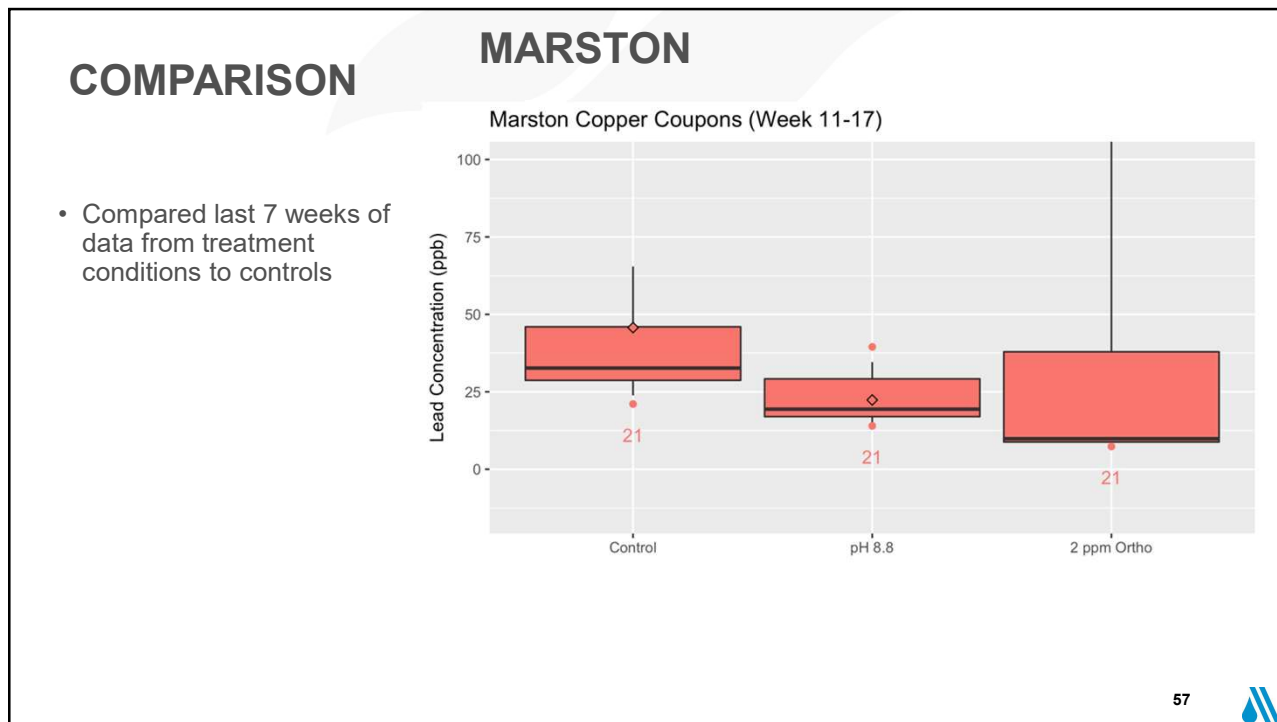
- Conditioning continued beyond 6 weeks
- Inter-replicate variability was generally low
- Intra-replicate variability was very low
- Upset conditions can still occur and last over multiple weeks



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## PILOT AND IMMERSION TEST CONDITIONS

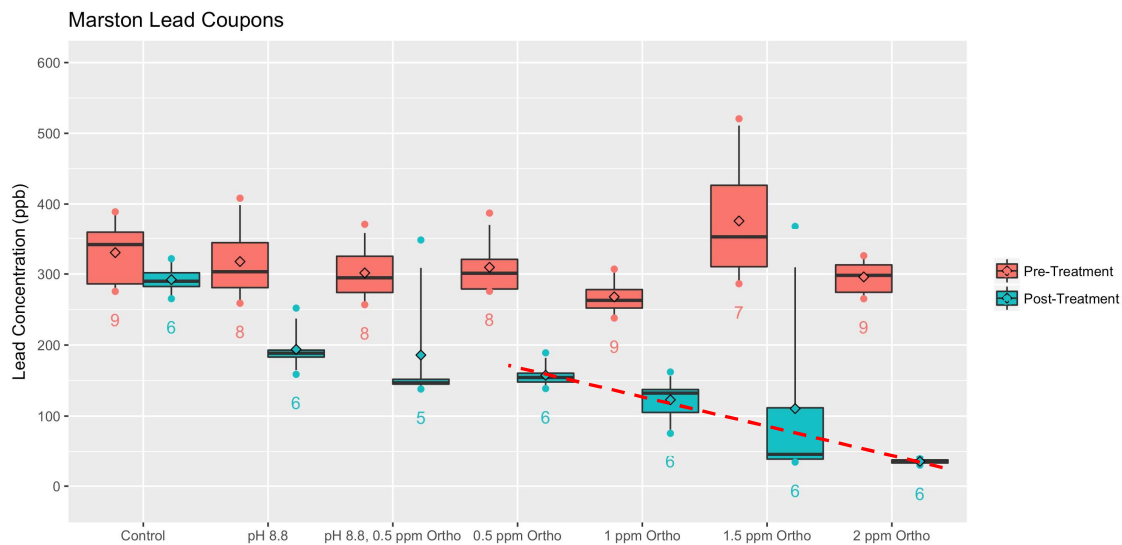
Condition	Chem. Add	pH	Source Waters
Ortho	2 mg/L PO <sub>4</sub>	7.8	2
pH	NaOH	8.8	2

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## LEAD COUPON PERFORMANCE VS ORTHO DOSE



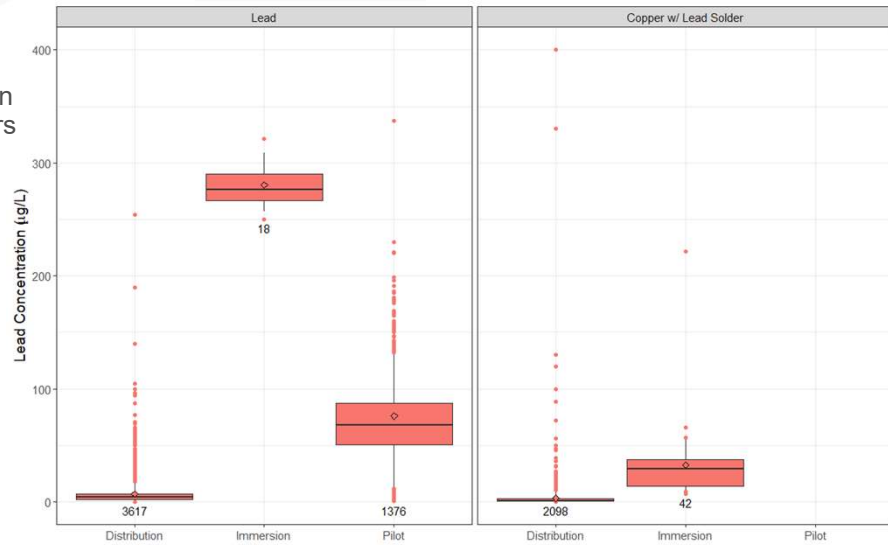
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## LEAD CONCENTRATION COMPARISON

- Neither pilot or immersion data were good predictors of actual lead concentrations in the distribution system

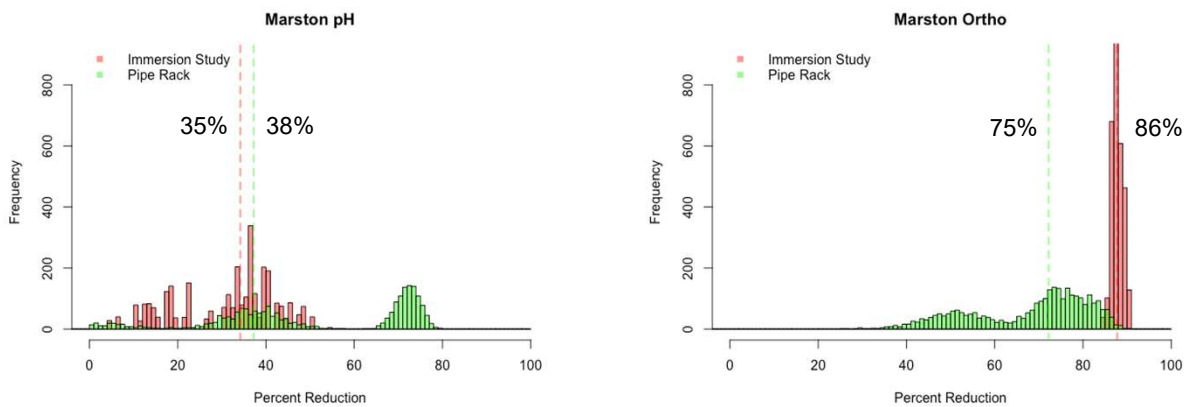


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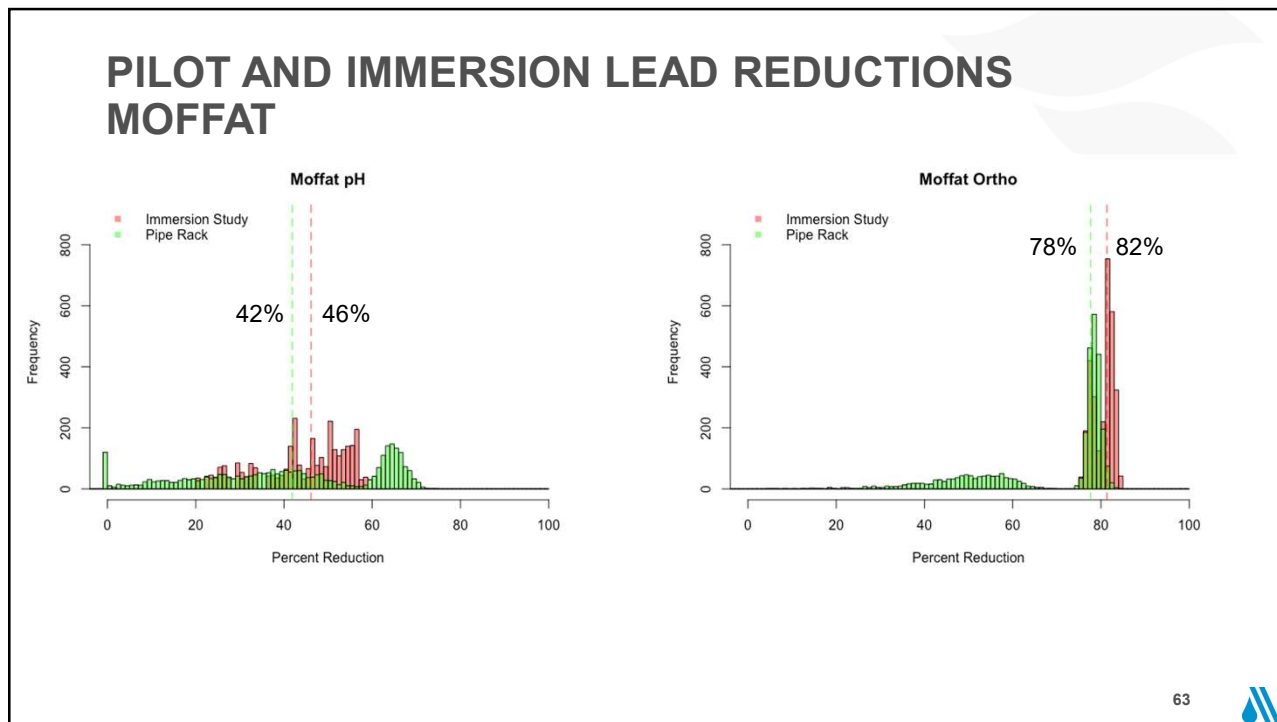
## PILOT AND IMMERSION LEAD REDUCTIONS MARSTON



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### LESSONS LEARNED

	Pilot Study	Immersion Test
Captures seasonal changes		
Captures in-situ conditions		
Predicts lead concentrations		
Prone to upset		
Inter-replicate variability		
Intra-replicate variability		
Comparison of treatments		
Optimize dose/pH		
Time commitment		

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## ACKNOWLEDGEMENTS

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Rachel Himyak

### Corona Environmental

Chad Seidel  
Sheldon Masters  
Carleigh Samson  
Sierra Johnson

### Others

Selene Hernandez-Ruiz  
Quirien Muylwyk – AECOM  
Vernon Snoeyink  
CDPHE  
EPA Region 8

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## THE EQUIVALENCY MODEL TO COMPARE THE DESIGNATED OCCT TO THE REQUESTED VARIANCE

Chad Seidel  
President  
Corona Environmental  
Consulting, LLC

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## PURPOSE

Appendix II.A

Comparing Estimated Impacts of OCCT and Lead Reduction Plan Implementation on Lead Exposure at Denver Water Customers

“...compare the estimated impacts of the designated optimal corrosion control treatment (OCCT) with the Denver Water proposed Lead Reduction Plan (LRP) conditions on lead exposure to Denver Water customers.”



**Objective**  
The objective of this analysis is to compare the estimated impacts of the designated optimal corrosion control treatment (OCCT) with the Denver Water proposed Lead Reduction Plan (LRP) conditions on lead exposure to Denver Water customers.

**Approach**  
Corona has developed and exercised a statistical model to conservatively compare the impacts of orthophosphate addition as OCCT and LRP implementation of increased pH/alkalinity with accelerated

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## OVERVIEW

- Probabilistic model of lead concentrations at all service connections in the Denver Water system year-over-year:
  - impacts of orthophosphate addition as OCCT
  - vs.
  - Lead Reduction Program (LRP) implementation of increased pH/alkalinity with accelerated lead service line replacement and lead filter deployment

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## OVERVIEW

- Based on best data available, not perfect data
- Uses lead data from pilot racks which are known to be higher than those observed in field
- Used to determine equivalence
- ***Not representative of current or future LCR compliance data***

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## COMPARING OCCT WITH LRP

### OCCT: Orthophosphate

- Corrosion control using orthophosphate
- Continue current lead service line replacement of ~1,200/year

### LRP: Proposed Variance

- Corrosion control using pH and alkalinity adjustment
- Accelerated lead service line replacement of 7% per year (5,190/year)
- Pitcher filters for all customers with a lead service line

**How do we discern expected lead concentrations?**



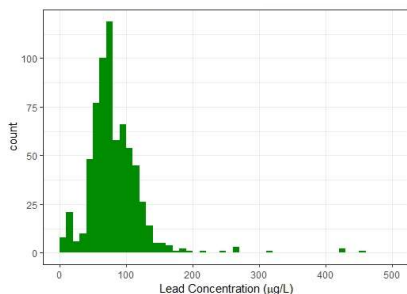
70

## COMPARING OCCT WITH LRP

How do we discern expected lead concentrations?

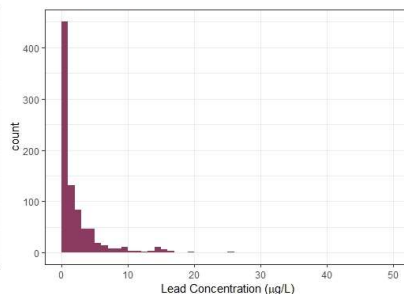
- Existing service line material and associated lead concentrations

Lead Service Lines



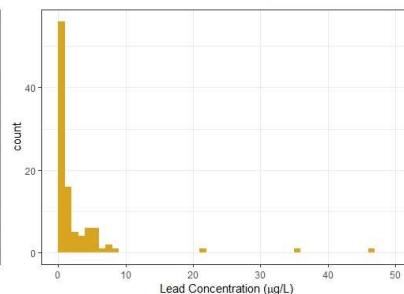
Pipe Rack Control Concentrations

Copper with Lead Solder Service Lines



CuLS Service Lines DS Sample Results

Other Service Lines



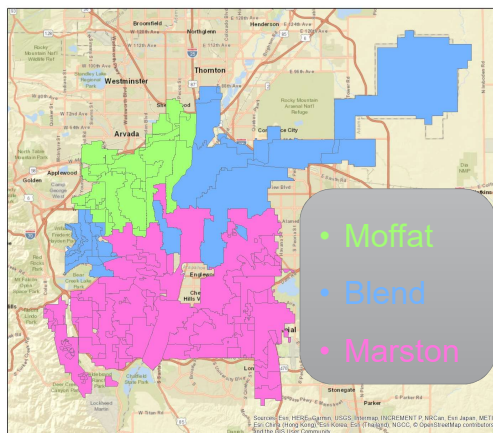
Other Service Lines DS Sample Results

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## COMPARING OCCT WITH LRP

How do we discern expected lead concentrations?

- Existing service line material and associated lead concentrations
- Water source
  - Moffat
  - Marston
  - Blend

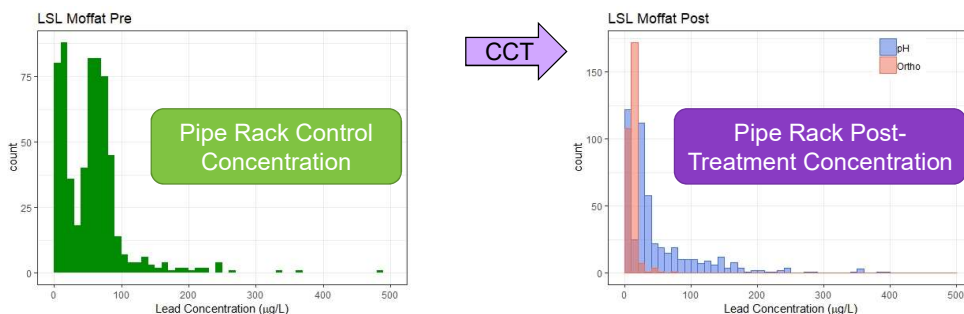


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## COMPARING OCCT WITH LRP

How do we discern expected lead concentrations?

- Existing service line material and associated lead concentrations
- Water source
- Corrosion control effectiveness: Ortho vs. pH
  - Pipe racks for lead service lines

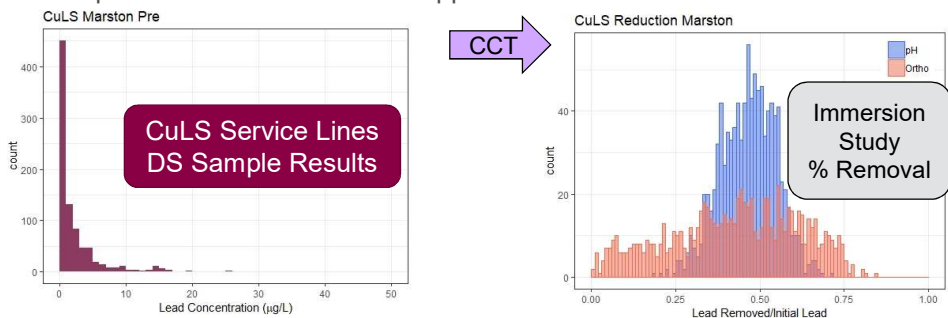


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## COMPARING OCCT WITH LRP

How do we discern expected lead concentrations?

- Existing service line material and associated lead concentrations
- Water source
- Corrosion control effectiveness
  - Pipe racks for lead service lines
  - Coupon immersion studies for copper with lead solder service lines

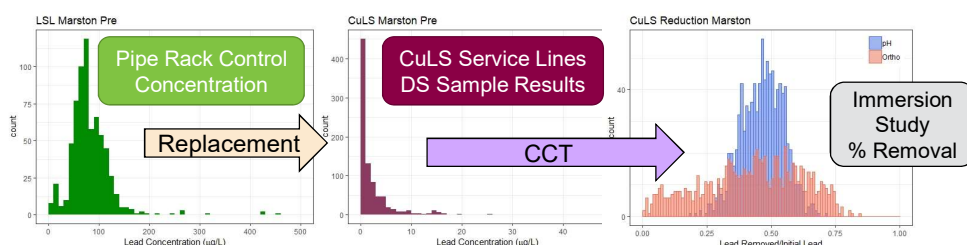


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## COMPARING OCCT WITH LRP

How do we discern expected lead concentrations?

- Existing service line material and associated lead concentrations
- Water source
- Corrosion control effectiveness
  - Pipe racks for lead service lines
  - Coupon immersion studies for copper with lead solder service lines
- Lead service line replacement



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## COMPARING OCCT WITH LRP

How do we discern expected lead concentrations?

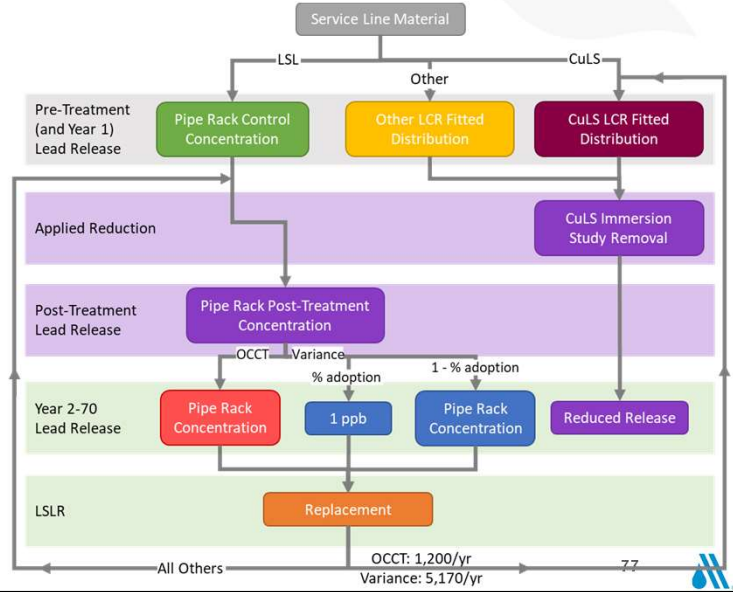
- Existing service line material and associated lead concentrations
- Water source
- Corrosion control effectiveness
  - Pipe racks for lead service lines
  - Coupon immersion studies for copper with lead solder service lines
- Lead service line replacement
- Pitcher filter effectiveness and adoption rate



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## EQUIVALENCY MODEL CONFIGURATION FLOWCHART

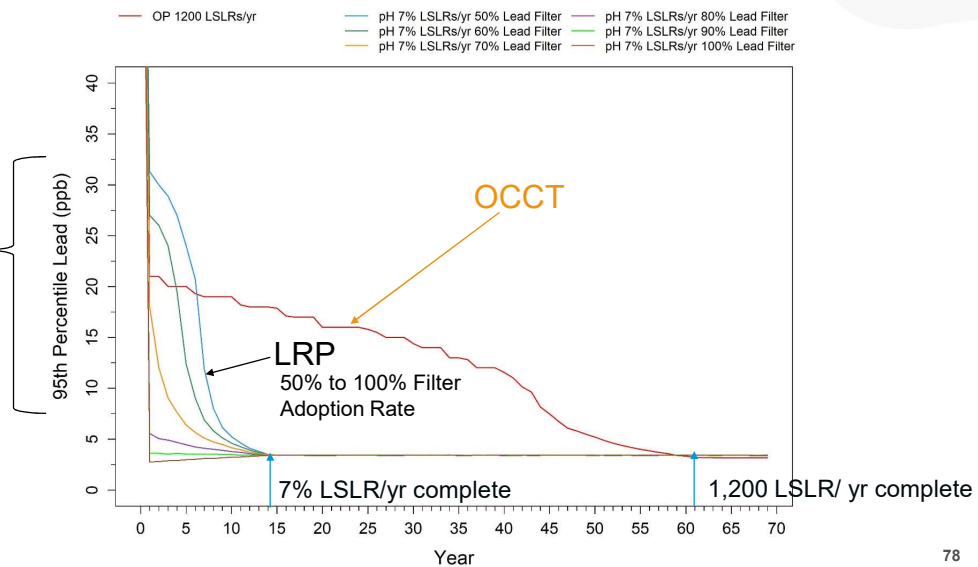
- Estimates lead exposure for all connections each year for OCCT and LRP conditions



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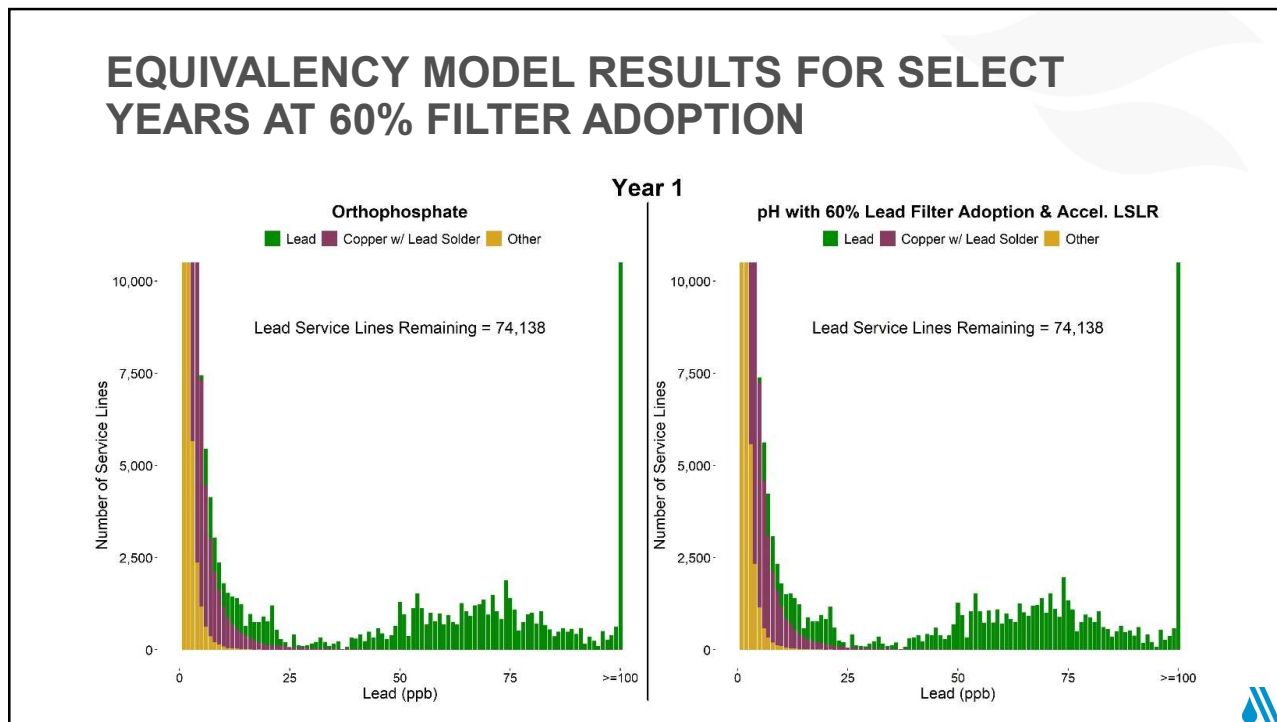
## MODEL SUMMARY: 95<sup>TH</sup> PERCENTILE LEAD CONCENTRATIONS OVER TIME

Model Estimated 95<sup>th</sup> Percentile Lead Levels



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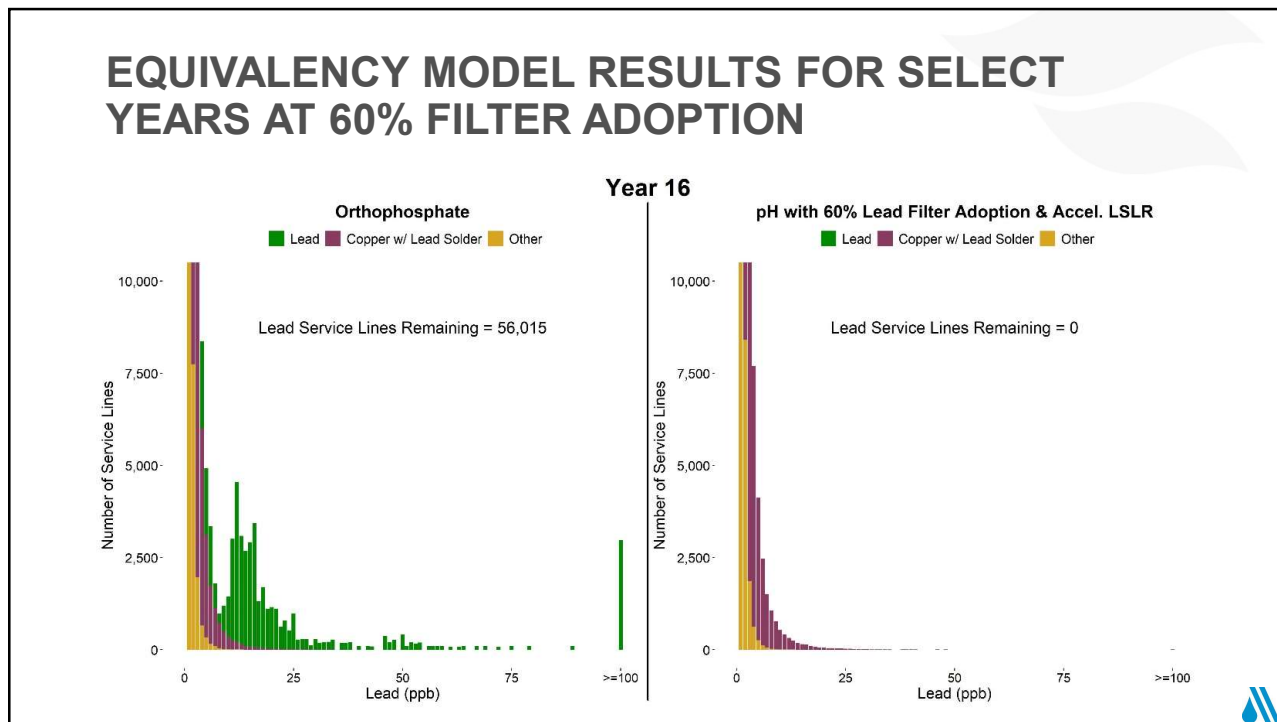
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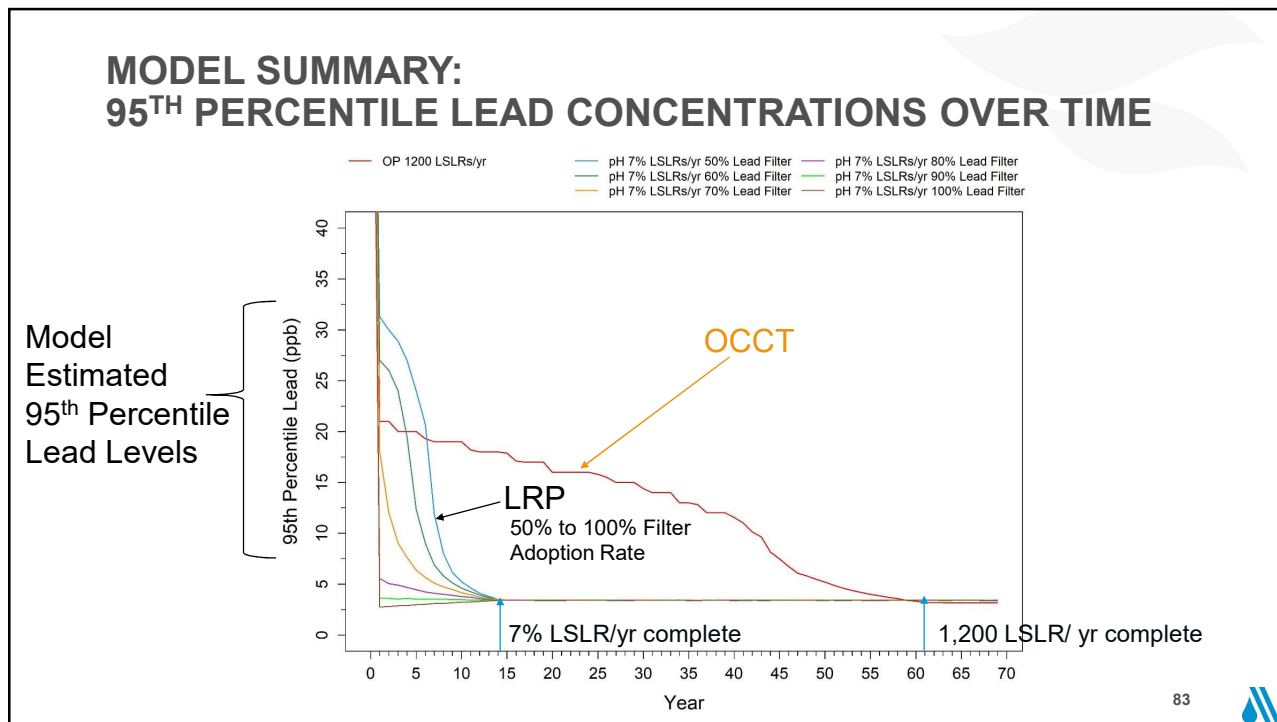
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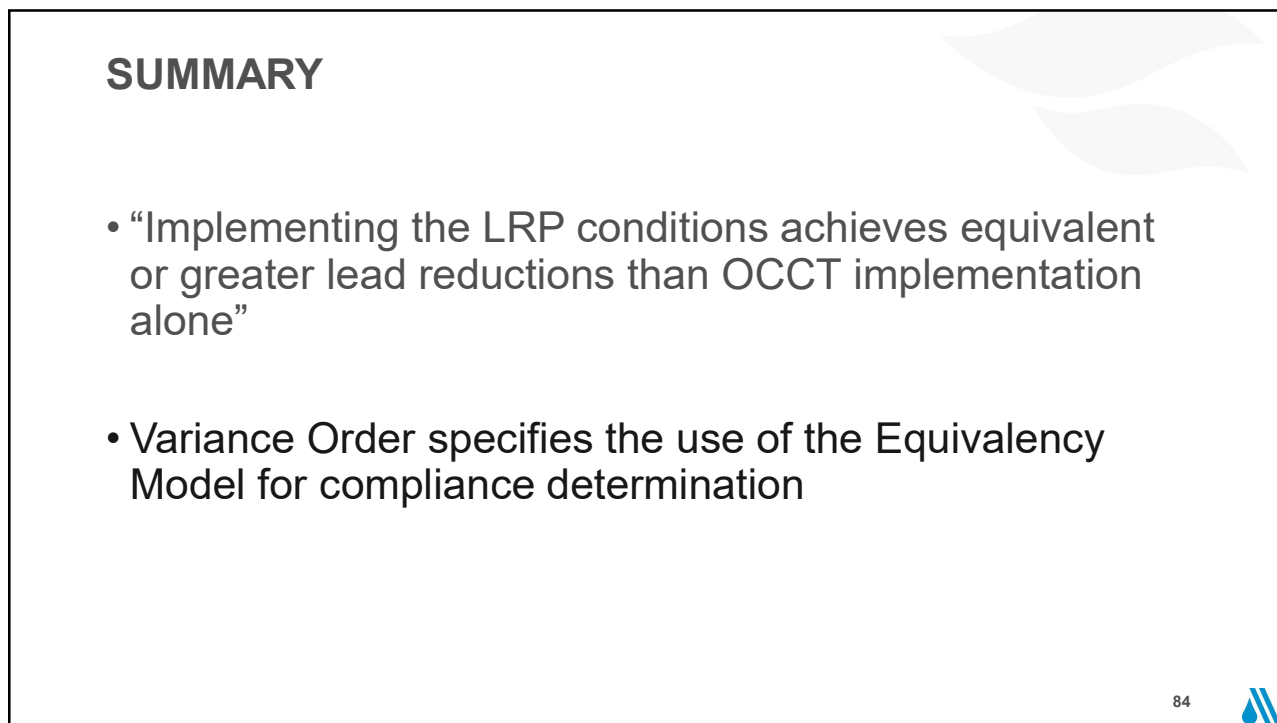
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## CONCLUSION

- “The studies show that the comprehensive approach of accelerated lead service line replacement, filter distribution and pH/alkalinity adjustment will be more efficient at reducing lead releases compared with the use of orthophosphate alone while reducing impacts to wastewater treatment plants and the environment.”

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## ASK THE EXPERTS



**Nicole Poncelet-Johnson**  
Denver Water



**Tyson Ingels**  
CDPHE



**Chris Corwin**  
Corona Environmental  
Consulting, LLC



**Chad Seidel**  
Corona Environmental  
Consulting, LLC

Enter your **question** into the **question pane** at the lower right hand side of the screen.

Please specify to whom you are addressing the question.

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- [Regulatory Concerns and Updates for Inorganic Contaminants Webinar](#)
- May 19 - 1:00 PM - 2:30 PM (Mountain)
- [Corrosion Control \(Contaminants of Concern: Managing Lead and Manganese\)](#)
- May 22 - 1:00 PM - 2:30 PM
- [Strategies for Understanding and Managing Risk from Lead \(Contaminants of Concern: Managing Lead and Manganese\)](#)
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- Until next time, keep the water safe and secure.

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## PRESENTER BIOGRAPHY INFORMATION

- *Nicole Poncelet-Johnson is a professional engineer with over 25 years of experience in water and wastewater utility operation, construction, and management and has served as the Director of Water Quality and Treatment at Denver Water since 2017. Starting in 2018, Nicole lead Denver Water's efforts to research and identify an alternative solution to orthophosphate as optimal corrosion control treatment, which has since evolved into Denver Water's Lead Reduction Program and variance. She's a graduate of Purdue University's Civil Engineering program and holds Colorado Class A operator licenses in water and wastewater treatment.*
- *Tyson Ingels is the Lead Drinking Water Engineer for CDPHE. His responsibilities include technical justification for new policy and regulation, acceptance of alternative technologies (e.g. membranes, UV disinfection) within the State, as well as acting as technical expert both on DW design review issues and inspection issues. Mr. Ingels also is primary contact responsible for Drinking Water emergencies and acute situations within Colorado*
- *Dr. Chris Corwin has over 15 years of experience as a professional engineer and project manager providing the drinking water community with services in process planning, treatment optimization, bench testing, and pilot testing. His research has been published in ES&T, Water Research, and Journal of American Water Works Association.*
- *Chad Seidel, Ph.D., P.E. is President of Corona Environmental Consulting, LLC and an active member of the AWWA Inorganic Contaminants Research Committee. He focuses on improving public health protection by solving water-related engineering, science, and policy challenges.*

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