



Figure IV-4.-- Monthly Mean Log Removal of Spores from Presedimentation vs. Monthly Mean Turbidity Log Reduction

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c. Request for comment. EPA requests comment on the proposed criteria for awarding credit to presedimentation. EPA would particularly appreciate comment on the following issues:

- Whether the information cited in this proposal supports the proposed credit for presedimentation and the operating conditions under which the credit will be awarded;
- Additional information that either supports or suggest modifications to the proposed performance criteria and presumptive credit;
- Today's proposal requires systems using presedimentation to sample after the presedimentation basin, and these systems are not eligible to receive additional presumptive *Cryptosporidium* removal credit for presedimentation. However, systems are also required to collect samples prior to chemical treatment, and EPA recognizes that some plants provide chemical treatment to water prior to, or during, presedimentation. EPA requests

comment on how this situation should be handled under the LT2ESWTR.

- Whether and under what conditions factors like low turbidity raw water, infrequent sludge removal, and wind would make compliance with the 0.5 log turbidity removal requirement infeasible.

6. Bank Filtration

a. *What is EPA proposing today?* EPA is proposing to award additional *Cryptosporidium* treatment credit (0.5 or 1.0 log) for systems that implement bank filtration as a pre-treatment technique if it meets the design criteria specified in this section. To be eligible for credit as a pre-treatment technique, bank filtration collection devices must meet the following criteria:

- Wells are drilled in an unconsolidated, predominantly sandy aquifer, as determined by grain-size analysis of recovered core material—the recovered core must contain greater than 10% fine-grained material (grains less than 1.0 mm diameter) in at least 90% of its length;

- Wells are located at least 25 feet (in any direction) from the surface water source to be eligible for 0.5 log credit; wells located at least 50 feet from the source surface water are eligible for 1.0 log credit;

- The wellhead must be continuously monitored for turbidity to ensure that no system failure is occurring. If the monthly average of daily maximum turbidity values exceeds 1 NTU then the system must report this finding to the State. The system must also conduct an assessment to determine the cause of the high turbidity levels in the well and consult with the State regarding whether previously allowed credit is still appropriate.

Systems using existing bank filtration as pretreatment to a filtration plant at the time the systems are required to conduct *Cryptosporidium* monitoring, as described in section IV.A, must sample the well effluent for the purpose of determining bin classification. Where bin classification is based on monitoring the well effluent, systems are not eligible to receive additional credit for