

Corrosion Control: American Water Works Association Issues Implementation Framework



Walter Wright, Jr.
wwright@mwlaw.com
(501) 688.8839

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The American Water Works Association (“AWWA”) issued a document titled:

Corrosion Control Implementation Framework (“Framework”).

The stated intent for issuing the Framework was to provide guidance to water systems seeking to implement corrosion control treatment (“CCT”):

- Either for compliance with the Lead and Copper Rule (“LCR”), considering the new requirements promulgated by the Lead and Copper Rule Improvements (“LCRI”);
- To achieve other system specific goals; or,
- As a resource to state primacy agencies overseeing water systems that will be optimizing or reoptimizing CCT under the LCR.

The Framework was prepared by:

- Caroline Russell and Jerry Yan
- Carollo
- David Cornwell and Michael Sun
- Cornwell Engineering Group

The Framework also notes that its intent is to provide a concise guide to water systems on:

1. How and when to conduct the different steps that can comprise a corrosion control study (CCS), and
2. How to make a CCT decision based on system-specific characteristics and findings from the CCS.

Further, the Framework is stated to be aligned with the requirements under the LCR and accounts for the improvements in the LCR with an associated November 1, 2027 compliance date, providing a needed roadmap that is stated to complement:

- Pending updated USEPA guidance.
- Planned update to AWWA’s Manual of Practice (M58) on Internal Corrosion Control in Water Distribution Systems.

Key components of the Framework include:

- DRIVERS
- TIMELINE AND COSTS

- DESKTOP EVALUATION
- OTHER ANALYSES
- DEMONSTRATION TESTING
- CCT DECISION
- CCT IMPLEMENTATION
- POST IMPLEMENTATION OWQP
- RE-OPTIMIZATION

AWWA describes itself as including more than 4,300 utilities that supply roughly 80% of North America's drinking water and treat almost half of North America's wastewater. The 50,000 members represent the full spectrum of the water community: water and wastewater systems, environmental advocates, scientists, academicians, and others who hold a genuine interest in water.

A copy of the Framework can be found [here](#).