Nitrification Action Plan (NAP) Guidance

Purpose

The purpose of a Nitrification Action Plan, or a NAP, is to ensure that chloramine disinfection is successful by preventing and/or responding to nitrification. This document will help you develop your system's site-specific NAP and establish action levels to detect and prevent nitrification. The table below gives some information about selecting sample sites and how often you should sample to begin establishing baselines.

Sample Sites	 Routine coliform and/or disinfectant residual sites may be used for NAP sample sites. For systems serving more than 1,000 people, NAP sampling sites should be established at entry point(s), average water age, and maximum water age locations. Sites should be chosen to determine the impact of blending multiple sources.
Sample Frequency	 The rule lists the minimum sampling requirements. It may be necessary for you to perform extra sampling to understand your distribution system better.

Controls:	Critical Control Conditions for Chloramination					
Total Chlorine	Total chlorine is the sum of all active chlorine species. It is the level that is regulated.					
	The minimum allowable total chlorine residual is 0.5 mg/L throughout distribution.					
	The maximum residual disinfectant level (MRDL) for total chlorine is					
	4.0 mg/L based on the running annual average of all samples collected in					
	distribution.					
Ammonia	Ammonia reacts with chlorine to make monochloramine and other chloramines.					
	As monochloramine decays, ammonia is released.					
Monochloramine	Monochloramine is the disinfecting member of the chloramine family.					
	Ideally, all of the total chlorine will be present as monochloramine.					
Free Chlorine	You are not required to measure free chlorine, except during a temporary					
	conversion to free chlorine performed as a NAP action.					
Nitrite	Nitrite is formed by ammonia-oxidizing bacteria which 'eat' ammonia.					
Nitrate	Nitrate is formed by nitrite-oxidizing bacteria which 'eat' nitrite.					
рН	A decrease in pH can indicate nitrification. Therefore, pH measurement is					
	recommended at systems with low alkalinity. PWSs that use pH elevation as a					
	nitrification control strategy should also monitor pH in the distribution system.					

Goals and Baselines

- Goals and baselines are the normal, good levels at each point in the distribution system.
- 'Goals' are set for total chlorine, monochloramine, and ammonia to make sure that disinfection treatment is operated correctly.
- 'Baselines' are set for nitrite and nitrate, because they come from source water, and are not under a system's control. Initial results will be used to set goals and baselines.
- Ongoing, routine sampling will be used to detect potential nitrification and take appropriate action.

Total chlorine goal and Monochloramine goal

- The total chlorine and monochloramine goals can be set at the same value, because they should always be about the same.
- The entry point goal should be high enough so that the maximum water age site can achieve its goal.

Ammonia goal

- Ideally, water at entry points just after treatment would have zero ammonia because it is 'food' for the nitrifying bacteria. Having a trace of ammonia is good because it shows that the water is in the monochloramine zone.
- Ammonia naturally increases with time.
- The ammonia goals in average and high water age locations should represent good, normal operating conditions.

Nitrite baseline and Nitrate baseline

- The nitrite and nitrate baselines are the concentrations in the source water.
- The nitrite and nitrate in the distribution system should always be the same as the source water. The only thing that can change them is nitrification, cross connection, or source water changes.

Triggers:	Yellow Flag Alerts and Red Flag Alarms					
Yellow Flag	Yellow alert levels are somewhat out of the norm, indicating that nitrification may					
"Alert"	have started. Some action to get back to normal is neededbut it is probably a routine					
Triggers	type of action like flushing.					
Red Flag	Red alarm levels happen when it becomes difficult to maintain a compliant total					
"Alarm"	chlorine residual, and there is a strong possibility that nitrification is the culprit. If					
Triggers	routine actions don't get the system back to normal, more intense action will be					
35	needed.					

Total	Total chlorine is the regulated value, so most systems have more data for total							
Chlorine	chlorine than any other constituent. Therefore, PWSs should have at least a year of							
	historical weekly or daily data to use for setting triggers. If a nitrification event has							
	occurred, the exact levels where nitrification took place can be used. Otherwise, yellow							
	and red trigger levels should be estimated.							
Mono-	Ideally, all of the total chlorine should be monochloramine. However, some							
chloramine	systems may have characteristic ratios of mono-to-total, for example-80% or 90%.							
Ammonia	Ammonia will decrease during nitrification. If ammonia is not detected,							
	nitrification is likely the cause. Note: Ammonia is measured as 'free available							
	ammonia as nitrogen'.							
Nitrite	Nitrite may increase or decrease during nitrification. Therefore, any							
	significant deviation of the nitrite level could indicate nitrification. During the initial							
	stages of nitrification, nitrite will increase; as nitrification progresses, nitrite will drop							
	as it is converted to nitrate.							
Nitrate	Nitrate increases when nitrification is very bad. The only possible reasons to							
	see nitrate increases are (1) Nitrification, (2) Cross connection with sewage or fertilizer,							
	or (3) Source water contamination. Any of these is a major issue.							

NAP Example Template
This is an example of a NAP form. A PWS must determine their own site-specific sample points, goals, baselines, triggers and actions.

Chloramine-Effectiveness Sample Suite										
Site	Chemical	Goal	Yellow Alert		Red Alarm					
Site			Trigger	Actions	Trigger	Actions				
Entry Point	Total / Mono	mg/L	mg/L		mg/L					
Lifty Follit	Ammonia	mg/L	mg/L		mg/L					
Average Water Age	Total / Mono	mg/L	mg/L		mg/L					
Average water Age	Ammonia	mg/L	mg/L		mg/L					
Far Reaches	Total / Mono	mg/L	mg/L		mg/L					
I al Neaches	Ammonia	mg/L	mg/L		mg/L					
Nitrite/Nitrate										
Site	Chemical	Baseline	Yellow Alert		Red Alarm					
Site			Trigger	Actions	Trigger	Actions				
Entry Point	Nitrite	mg/L	mg/L		mg/L					
Entry Point	Nitrate	mg/L	mg/L		mg/L					
Source water(s)	Nitrite	mg/L	mg/L		mg/L					
Source water(s)	Nitrate	mg/L	mg/L		mg/L					
Blended water	Nitrite	mg/L	mg/L		mg/L					
Diciliaca water	Nitrate	mg/L	mg/L		mg/L					

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