

## **Consumer Confidence Report Rule** Select Content, Tools, and Resources to Stay in Compliance

Kendra Morrison September 23, 2015





## **About the Consumer Confidence Report Rule**

CCR Rule requires all community water systems to prepare and distribute an annual water quality report containing information about:

- Source of water
- Detected contaminants
- Compliance

System-consumer connection



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Federal Regulations: 40 CFR Part 141, Subpart O [40 CFR 141.151 – 141.155]



#### **Content Requirements for Report**

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1	Water System Information			
2	Source(s) of Water			
3	Definitions			
4	Detected Contaminant Table			
5	Information on <i>Cryptosporidium</i> , Radon, and Other Contaminants			
6	Compliance Status with NPDWR			
7	Variances and/or Exemptions			
8	Required Additional Information			

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#### **Common Problem Areas:**

#### <u>Content</u>

- Item 1: Water system information
- Item 2: Source(s) water
- Item 4: Detected contaminants table
- Item 6: Compliance status
- Item 8: Required additional information

#### Report Delivery and Certification Rule Deadlines



## **Report Content: Water System Information**

- Name and telephone number of a contact person
- Information on public participation opportunities
- Information for non-English speaking populations, if appropriate
  - Rule of Thumb: If you serve >5-10% non-English speaking people, include additional language(s) or access to information for translation.

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Don't forget to put your <u>water system name</u> and <u>PWS ID no.</u> (WY56xxxx) on your report!



## **Report Content: Source(s) of Water**

- Type of water
- Commonly-used name(s)



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- General location of water source(s)
- Source water assessment information, if available:
  - Notice of availability of completed assessment
  - Information on how customers can obtain it
  - A brief summary of the system's susceptibility to potential sources of contamination



## **Report Content: Detected Contaminants Table**

#### • Essential part of the CCR!

- Main table presents level of each detected contaminant
  - Detected contaminant is any regulated or unregulated contaminant detected at or above its method detection limit (or reportable limit)

- Regulated = contaminants subject to an MCL, MRDL, AL, or TT
- Unregulated = contaminants for which monitoring is required under 40 CFR 141.40 (Unregulated Contaminant Monitoring Regulation)
- Report any additional monitoring data (i.e. contaminants that are not detected or voluntary monitoring data) in another section of the CCR



#### What Data Do I Report?

- Contains data from monitoring completed during the previous calendar year
- For contaminants monitored less than annually, report the most recent results up to 5 years prior to the year the CCR covers

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 Include a brief statement explaining that the data presented is from the most recent monitoring done in compliance with the regulations

The EPA allows us to monitor for some contaminants less than once per year because the concentrations of these contaminants do not vary significantly from year to year, or our system is not considered vulnerable to this type of contamination. Some of our data, though representative, are more than one year old.



## How Do I Report the Data?

- Present drinking water standards as numbers greater than or equal to 1.0 in order to enhance consumer understanding of their drinking water quality
- Report water sample results relative to standards = "CCR Units"

**Types of Reporting Units:** 

- micrograms per liter (µg/L) =
- nanograms per liter (ng/L) =
- picograms per liter (pg/L) =

- parts per million (ppm) parts per billion (ppb)
- parts per trillion (ppt)
- parts per quadrillion (ppq)



# What are the Steps for Converting Results to Units Required by the Rule?

- <u>Step 1</u>: Review Lab result and determine if standard (MCL, AL) is greater than or equal to 1.0
- <u>Step 2</u>: Convert standard to CCR units by multiplying by a conversion factor
- <u>Step 3</u>: Convert sample result to CCR units by multiplying by the same conversion factor



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## **Example: Converting Lead Results to CCR Units**

#### <u>Step 1</u>:

○ Action Level Pb =  $0.015 \text{ mg/L (ppm)} \rightarrow \text{not} > \text{or} = 1.0$ 

<u>Step 2</u>:

- AL \* Conversion Factor = AL in CCR Units
- 0.015 ppm \* 1000 = 15 ppb Pb

<u>Step 3</u>:

- 90<sup>th</sup> Percentile Result \* Conversion Factor = 90<sup>th</sup> % Result in CCR Units
- 0.0007 ppm \* 1000 = 0.7 ppb Pb



## Where Can I Find More Information About CCR Units?

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- Appendix A to Subpart O of the regulation (40 CFR 141)
- EPA Fact Sheet: "Converting Laboratory Units into Consumer Confidence Report Units" (EPA 816-F-15-001, July 2015)

Contaminant	MCL	To Convert, Multiply BY	MCL in CCR Units	MCLG in CCR Units	Major Sources	Health Effects
Arsenic (ppb)	0.010 ppm	1,000	10 ppb	0 ppb	Erosion of	Some people
Fluoride (ppm)	4 ppm	-	4 ppm	4 ppm	Erosion of	Some people

 Both are located on EPA's Website at <u>http://water.epa.gov/lawsregs/rulesregs/sdwa/ccr/</u>



## How Can I Streamline the Development of my CCR?

#### CCR iWriter

- Provides regulation-compliant CCR (+)
- Must manually enter contaminant detection data (-)

#### CCR Generator Tool

- Provides detection data for regulated contaminants and list of violations (+)
- Cannot serve as a substitute for your CCR (-)



Step 1, go to: www2.epa.gov/region8-waterops

#### CCR Generator Tool

Location: Region 8 Drinking Water Online and Drinking Water Watch



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Step 2: Region 8 Public Drinking Water Watch



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#### Step 3: Click on "Review Consumer Confidence Data"



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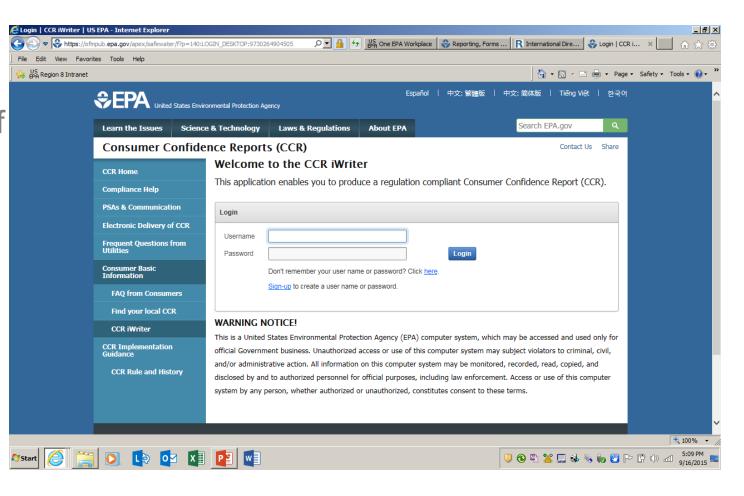
Step 4: CWS, year, report format; click "Generate Report"

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## **CCR iWriter**

- EPA moved location of tool
- Data from registered users transferred to new data system



Go to www.ccriwriter.com

View Contraction Of Contraction



## **CCR iWriter**

Type system name and PWS ID No. in "Report Title" box

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Consumer Confidence	Reports My Account	Help Contact Us		
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CR iWriter Report	1. System Information			
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Contaminant Information	* Contact Name:		9	Ground Water Under Direct Influence of Surface Water
UCMR Contaminants	Address:			Another Water System
formation	City:			How many people does the system serve?
Additional Contaminant	State:			O Less than 10,000 O 10,000 - 99,999
Significant Deficiencies	Zip Code:			O 100,000 or more
Cryptosporidium Monitoring	* Phone:			2
Radon Monitoring	Fax:			
). Voluntary Monitoring	* Email:			
. Compliance with Other ules	CCR report URL: Water System Homepage URL:			
. Variance and Exemptions				
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## **Report Content: Compliance Status**

- Violations
  - Include a clear indication of the violation in the detected contaminants table
  - Near the table explain (a) the violation, (b) the length of the violation,
    (c) potential health effects, and (d) action(s) taken to correct the problem

- Significant Deficiences (SD)
  - Include in CCR if ground water system receives a notice from EPA, and,
  - If the SD is not corrected by December 31<sup>st</sup> of year covered by CCR state (a) nature of SD, (b) date identified, and (c) information about the EPA-approved plan for correction (schedule, interim measures and any completed, progress to date)



## **Report Content: Required Additional Information**

• Every CCR must include an informational statement about lead in drinking water and its effects on children

If present, elevated levels of lead can cause serious health problems, especially for pregnant women and young children. Lead in drinking water is primarily from materials and components associated with service lines and home plumbing. Your water system is responsible for providing high quality drinking water, but cannot control the variety of materials used in plumbing components. When your water has been sitting for several hours, you can minimize the potential for lead exposure by flushing your tap for 30 seconds to 2 minutes before using the water for drinking or cooking. If you are concerned about lead in your water, you may wish to have your water tested. Information on lead in drinking water, testing methods, and steps you can take to minimize exposure is available from the Safe Drinking Water Hotline or at <u>http://www.epa.gov/safewater.lead</u>.



## **Report Delivery**

- Delivery Requirements
  - Mail, or otherwise directly deliver (e.g., hand deliver or electronic delivery), one CCR to each customer by July 1<sup>st</sup> every year

- In addition, make a "good faith" effort to reach non-bill paying consumers
- Make the CCR available upon request
- Mailing Waiver for Small Systems



## **Report Delivery**

Waiver of direct mailing requirement for small WY systems signed into law by Wyoming's Governor in 1999

#### Serve <10,000 persons

- 1. Provide direct notice (paper, email) that CCR will be printed in a local newspaper or made available on an internet website, <u>and</u>
- 2. Publish CCR in local newspaper or on internet website, and
- 3. Make paper copies of the report available upon request.

#### Serve = or < 500 persons

- 1. Provide direct notice (paper, email) that report is available, and
- 2. Make paper copies of the report available upon request, or on an internet website.

## **Sedeptide**

#### **Example of Direct Notice – Postcard**

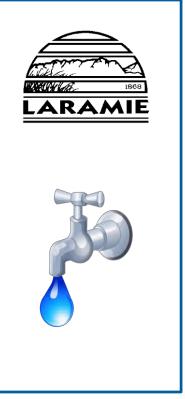
Your Annual Drinking Water Quality Report

Now Available Online

Each year the City of Laramie provides its customers with an Annual Drinking Water Quality Report to let them know how our drinking water quality compares against established federal and state drinking water standards. We encourage you to review this report as it provides details about the source and quality of the drinking water delivered to this community in 2014. In an effort to be more environmentally and fiscally responsible, we are no longer printing these reports, but have made them available on the Internet. Visit us online to view your water quality report at

http://www.cityoflaramie.org/DocumentC

<u>enter/View/7735</u> If you desire to have a paper copy, you can print one directly from our website. You can also receive a printed version by contacting The City of Laramie Utility Division at 307-721-5280.



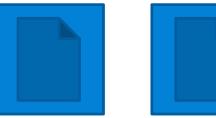
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## Certification

 Must certify to EPA that the report has been distributed to customers, and that the information is correct and consistent with the compliance monitoring data previously submitted to EPA

- Download current forms (annually) from Region 8 website: <u>http://www2.epa.gov/region8-waterops/reporting-forms-</u> <u>and-instructions-reporting-forms</u>
- DO <u>NOT</u> USE OLDER VERSIONS OF THE CERTIFICATION FORMS, OR THE CERTIFICATION FORM FROM THE CCRIWRITER!





### **Rule Deadlines**

 Mail or directly deliver one copy of CCR to customers and EPA Region 8 by July 1<sup>st</sup>

- Mail certification of compliance to EPA Region 8 by October 1<sup>st</sup>
- Wholesalers (selling water systems) must deliver data to consecutive systems (purchasing systems) by April 1<sup>st</sup>



## **Contact Information and Additional Resources**

Kendra Morrison CCR Rule Manager (303) 312-6145 <u>morrison.kendra@epa.gov</u>

Preparing Your Drinking Water Consumer Confidence Report For Water Suppliers (EPA 816-R-09-011, April 2010)

"Best Practices Factsheet: Consumer Confidence Report" (EPA 816-F-15-002, July 2015)

http://water.epa.gov/lawsregs/rulesregs/sdwa/ccr/compli ancehelp.cfm