Public Meeting on EPA's
Proposed Public Notification Rule and Handbook

FINAL REPORT – JULY 16, 1999

Days Inn Hotel and Conference Center
Allentown, PA

June 8-9, 1999

Public Notification Public Meeting
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The U.S. Environmental Protection Agency (EPA) is proposing changes to its drinking water public notification (PN) regulations (64 *FR* 25963, May 13, 1999). The PN regulations apply to owners and operators of public water systems that fail to comply with the drinking water standards and related regulations under the Safe Drinking Water Act. EPA is also developing a draft *Public Notification Handbook* (EPA 816-R-99-004) to aid water systems in their efforts to prepare effective public notices.

EPA held a meeting to take comment on the PN rule and the *Public Notification Handbook* at the Days Inn Hotel and Conference Center, in Allentown, PA on June 8 and 9, 1999. (This was one of a series of meetings EPA held throughout the country; the other meetings were in Madison, WI, Washington, DC, and Phoenix, AZ. EPA announced the public meetings in the *Federal Register,* 64 *FR* 27942, May 24, 1999.) Forty-three people attended the Allentown meeting (see Attachment 1). EPA had three major objectives during the meeting.

- *Invite public comment on the proposed rule:* EPA presented a summary of the requirements under the proposed PN rule. Participants asked clarifying questions during this presentation. Following the presentation, EPA invited people to submit formal public comments for the record.

- *Discuss the draft Public Notification Handbook in a workgroup setting*: In a plenary session, EPA solicited input on how easy the handbook is to use, its appropriateness for small systems, and its helpfulness for writing public notices. During breakout sessions, participants worked together to create draft notices and provided feedback on the usefulness of the templates and handbook as well as the effectiveness of their notice and chosen delivery method.

- *Obtain comment on sample public notices:* In an evening session, EPA asked a small group of people to review two sample notices created using the handbook. The group provided feedback on how effectively the notices communicated their message.

Introduction

Patti Kay Wisniewski of EPA's Region 3 office welcomed the group. She thanked them for attending, and asked the participants to introduce themselves. Carl Reeverts of the U.S. EPA Office of Ground Water and Drinking Water and rule manager for the PN rule also welcomed the participants.

Rule Summary

Mr. Reeverts gave a summary of the PN rule. (Attachment 2 is a copy of the presentation.) During and after his presentation, participants asked clarifying questions and provided official comments for the record. Three people gave formal comments on the rule. A transcript of this session is provided in Attachment 3. The following comments and questions arose in this session:

Rule comment (141.202(b)): For a Tier 1 notice, 24 hours does not allow time to distribute a notice by any means other than radio or TV. Shortening the deadline from 72 hours to 24 hours will eliminate the option of placing advertisements in newspapers. (Peter Lukens, North Wales Water Authority)

> Carl Reeverts responded that the proposed rule requires operators to take reasonably calculated steps to reach all persons served; it prescribes radio, TV, or hand delivery. While the system's obligation goes beyond that, the rule does not say exactly what systems must do. He said that systems should work with their primacy agencies to distribute the PN as quickly as possible. Christine O'Brien, OGWDW, added that the handbook encourages operators to work with electronic media such as radio and TV stations to meet the 24 hour requirement.

Question: The Pennsylvania Department of Environmental Protection (PA DEP) has approved the use of phone dialers to distribute PNs in the past. Would this be an acceptable option for distributing notices under the proposed rule? (Bruce Carl, PA DEP)

> Carl Reeverts responded that the rule does prescribe radio or television or postal or hand delivery; however, phone dialers could be a secondary method of delivery.

Question: Is it correct that violation levels do not have to be in CCR units? (Liesel Adam, Lehigh County Authority)

> Carl Reeverts responded that the PN rule does not prescribe how the water system should report violations. Throughout the regulatory process, EPA decided it was inadvisable to prescribe specific reporting units for public notices.

Rule comment (141.202, Table 1; 141.203, Table 1): EPA should define the requirements for elevating violations to higher tiers to give systems advance warning that they may have less time to create notices. (Paul Zielinski, Pennsylvania American Water Company)

> Carl Reeverts responded that a state may choose to address this issue when it revises its primacy package.

Three participants gave formal comments for the record on the proposed PN rule.

Frederick Loomis of Clean Water Action provided three specific comments on the rule. The complete text of his comment is included as Attachment 4.

> Rule comment (141.203(b)): The deadline for Tier 2 notification is too long.
>
> Rule comment: The rule needs to include a requirement for tracking compliance, as recommended in the General Accounting Office (GAO) report.
>
> Rule comment (Part 141, Appendix A): Turbidity violations should be included in Tier 1.

Rule comment (141.205(d)(2)): The standard monitoring language is not always accurate; often systems do know that public health was not at risk. For example, in the case of THMs where compliance is based on annual averages, one missed sample would not impact the system's ability to assess whether consumers' health was at risk. (Peter Lukens, North Wales Water Authority)

Rule comment (141.202(c)): More alternatives for distributing Tier 1 notices, such as phone dialers, are needed. The rule should also be clearer about how long posted notices should remain in place. (Bruce Carl, PA DEP)

Discussion of the *Public Notification Handbook*

Mr. Reeverts described EPA's *Public Notification Handbook* to the group. Christine O'Brien led the group in a discussion of the usefulness of the handbook.

Ms. O'Brien asked the group for their general impressions of the handbook. People offered the following comments and suggestions.

- A topic index would be helpful for finding information. Suggested items for the index include: what needs to be published, how to prepare a notice, and Tables 1 and 2.
- Cross-reference the handbook by contaminant, including the tier-specific chapters, and the table of contents, which is the part of the handbook people are most likely to read.
- The chapter titles in the table of contents should be in capital letters to stand out more.
- Once the tier of the violation is known, the handbook is easy to follow.
- Operators of small systems will most likely go straight to the templates to prepare notices.

Ms. O'Brien asked the group to review Chapter 2, "How to Use This Handbook." A participant responded that this chapter is good for an initial read of the handbook. It should be included either as part of the cover letter or before the table of contents.

When Ms. O'Brien asked participants for their thoughts on Chapter 3, "Summary of Requirements," they offered the following suggestions:

- Add page numbers along with chapter references.

- The tier headings in Table 1 should be larger. One participant suggested that the table focus on specific contaminants rather than the tiers. (Handbook, p. 5)

Ms. O'Brien asked for opinions from the group on Chapter 4, "Making Public Notification Work."

- Re-title the chapter as "Planning for Public Notification" or "Tips for Public Notification." (Handbook, p. 13)

- In the handbook, both the required elements for a notice and the suggestions for layout of the notices are numbered; this may lead to confusion. A participant suggested that only one set of elements be numbered.

- Mandatory language should be presented in bold and italics to stand out.

- One person said the handbook should be no more than 20 pages long. Other suggestions included using the active voice and eliminating the introductory text. A companion condensed version for quick reference would be a helpful alternative to shortening the handbook.

- The handbook should give examples of violations.

The group offered the following comments on Chapters 5, 6, and 7 (Tier-specific instructions).

- In the "ten elements" graphic, reference Appendix B on item 3, health effects language.

- Some in the group said the instructions and templates should be side-by-side. It would be helpful to more clearly distinguish the instructions from the templates, perhaps by putting a border around the templates. Other members believed the front and back presentation for each template made it more convenient for updating and adding other templates.

- Tier 2 violations tend to be covered by the media only if reporters consider the situation to be a "disaster." The handbook should suggest that, in some situations, distributing a notice in the operator's exact words may be worth spending money on a newspaper advertisement.

- Add a few more Tier 3 templates (e.g., VOCs or SOCs) and sample public notices. Additional templates and sample notices could be added to EPA's web site – this would provide more examples without making the handbook excessively large.

- Add notes pages at the back of the handbook for operators to record phone numbers for contacts and other important information.

The group offered the following comments on Chapter 8, "Special Needs of Non-Community Systems."

- Primacy agencies may have different requirements than those in the handbook; EPA should make this clear. (Handbook, Ch. 8)

- Table 3 is more useful than Tables 1 and 2. (Handbook, p. 70)

Ms. O'Brien asked the group if they had any suggestions for improving the Appendices. They made the following suggestions.

- The order in which contaminants are presented in Appendices A and B is not clear. A participant suggested listing Tier 1 violations first. (Handbook, p. 85-99)

- Appendix B should include the tier of the violations. (Handbook, p. 91)

- The term "standard language" at the tops of Appendices A and B should be replaced with "mandatory language." The mandatory health effects language should be italicized in Appendix B to be consistent with the rest of the handbook. (Handbook, p. 85-99)

The participants offered other ideas for improving the handbook.

- The handbook does not address enforcement. For example, who is responsible if PN is not done, the system owner or the operator?

- The handbook should encourage internal communication at the PWS, especially the importance of clear-cut responsibilities for public notification. (Handbook, Ch. 4)

- The handbook should be distributed to operators by their primacy agencies and be available in multiple formats, including print and disk. Public information staff should also receive the handbook.

Breakout Sessions

Participants spent the afternoon session on June 8 and the morning session on June 9 in small groups creating public notices based on a variety of scenarios (as described below). The group re-convened to discuss the notices they created and talk about suggestions and ideas for

improving the handbook and templates. The sample notices each group created are provided in Attachment 5.

JUNE 8

Group 1 -- Surface Water Treatment Rule (Failure to Filter)

Scenario: A small system using ground water under the influence of surface water and serving 3,300 was supposed to have installed filtration by May 1999 but has not done so. The system has met the MCLs for turbidity and total coliform over the past year.

- The introduction to Template 2-4 on page 49 of the handbook needs to be replaced by an explanation of the special circumstances of state determinations on ground water under the direct influence of surface water. Consumers who believe their system to be a ground water system may want more information about why their system has to meet surface water requirements.

- The standard health effects language did not seem useful.

- The section of the notice pertaining to "What Should I Do?" is very useful: it gives consumers ideas of steps they can take rather than telling them what to do.

- The description of corrective actions and the anticipated date the problem will be fixed should allow for delays in timing, e.g., "we expect to begin construction in the next three months." This will give the system some leeway in case construction of a filtration system has not begun by the time a repeat notice is issued.

Group 2 – Total Coliform MCL

Scenario: A system using ground water and serving 32,000 takes 30 samples for coliform bacteria per month. Last month two samples were positive for coliform. The three repeat samples taken for the first positive sample were also positive. The repeat samples taken for the second positive sample were not positive. No fecal coliforms were detected. The MCL is that no more than one sample per month may test positive. The system had another MCL violation for total coliform nine months ago. Public notice was done at this time.

The group felt it was important to address the total coliform violation from nine months ago fairly early in the notice and reassure the public that no adverse health effects were reported at that time.

In the section of the notice describing what the system is doing, the group felt is was necessary to describe what caused the problem before explaining corrective actions to give consumers a perspective on the problem.

The group offered several suggestions on the Handbook:

- The handbook should include a one-page flow chart at the front for operators who are familiar with the PN process and requirements, followed by an explanatory page for more detailed instructions.

- Table 1 should reference specific pages instead of chapters. (Handbook, p. 5)

When the handbook and rule are complete, EPA or PA DEP should sponsor seminars for community leaders to educate them on the PN process. These seminars could also be used to improve communication between water system managers and operators.

Rule comment (141.203(c)): One participant felt that mail or direct delivery are rarely done, rather, systems rely on newspaper notices, especially where billing cycles are not conducive to meeting the 30-day deadline for distributing Tier 2 notices.

Add PA DEP's Web site to the section on where to obtain more information.

One operator said that whenever he has issued a notice, people tend to not read the information they are given, but instead call the system, preferring to hear the information directly from an individual. He suggested that operators can play recorded messages via the contact phone number to fill in the information gaps and answer most of the questions that arise.

Group 3 -- Monitoring–Multiple Violations, Inclusion in CCR

Scenario: Assume the current date is June 2000. A small community water system serving 1,000 people did not monitor for total coliform in July, October, and December, 1999 (it is required to monitor monthly). The system uses ground water and does not disinfect at the source. In March 1999, the system did test positive for coliform, but no coliform was present in the repeat samples. The system also did not monitor for VOCs (it was required to sample once during the last compliance period, which ended 12/98).

Patti Kay Wisniewski suggested that for many systems, the main issues would be whether the consumer confidence report (CCR) could be used for public notification, given the different timing and delivery requirements for each. Some very small systems may get waivers allowing them to print their CCRs in newspapers rather than mail them to all their customers.

The group determined from Table 2 on page 7 of the handbook and from Appendix A that these were Tier 3 violations. A few people thought Appendix A was easier to read than page 7. The group members quickly looked through the list of ten elements required in the notice; these were rather straightforward.

Some participants went to page 9 to use Figure 1 to construct their notice, even though Figure 1 is for a Tier 2 violation. They thought it was easier to read than the chart on the template on page

68. They preferred to provide a written description of each violation, especially since the same violation occurred a three times.

One participant said he would send a letter, especially for four violations as in this case. The participant from New Jersey DEP said that letters from systems in his state were often poorly written. The group eventually agreed that the content would be similar to a regular notice but would start with, "Dear Customers." This provides a friendlier tone and does not unnecessarily alarm the public. It was unclear whether a letter would actually be inserted into the CCR; some people suggested including the notice as a sidebar or box in the CCR. One group member said her system would put the notice (or the CCR) on their letterhead and in water system envelopes so that consumers would think it was a bill. When they opened it and found a CCR or letter rather than a bill, they would be more likely to be curious and read it.

Some members of the group did not like the title, "Important Information About Your Drinking Water," because they thought this would distract from the second part of the title, which describes the actual violation and contains information that would make consumers read further. However, others thought that simply stating, "Monitoring Requirements Not Met" conflicted with the tone of the CCR, which is supposed to be an educational tool. The group agreed to keep the first line of the title.

The group thought that placing the standard monitoring language near the beginning of the notice was too alarming. They preferred to describe the violations, along with the fact that the system monitors for 80 other contaminants, followed by, "This is not an emergency. . ." and, "You do not need to boil water. . ." For the VOC violation, they preferred to list the individual contaminants in a footnote, as in the template, or refer consumers to call the state or the water system for a brochure on VOCs [possible rule issue]. They would then describe corrective actions taken and insert other language to reassure customers that steps were being to taken to prevent such violations from occurring again.

The group inserted the standard health effects language toward the bottom of the letter to reassure people that the water currently meets the standards.

Several people expressed reservations about using the CCR to deliver public notices for monitoring violations. They thought that the tone of a public notice conflicted with the educational and more positive tone of the CCR, especially if there were no other violations to report in the CCR. Even though using the CCR would enable them to meet their one-year deadline for public notification under this scenario, they would probably issue a separate notice at that time, without waiting a whole year.

In addition, it would be difficult (for both states and systems) to track all the monitoring violations and make sure notice was issued within one year of their occurrence. The participant from the New Jersey DEP said DEP would probably look annually at all systems with monitoring violations in the first part of each calendar year (since these would not meet the one-year deadline if they used the CCR) and ask them to do their public notification at that point.

One participant commented that the handbook did not adequately address the need to use alternative water supplies.

Another suggestion for the handbook was to move Chapter 4 (starting on page 13), "Making Public Notification Work," before Chapter 3 and to bold the first sentence of the chapter (on integrating Tier 1 public notification with emergency planning).

Group 4 – Nitrate MCL

Scenario: A small town using ground water serving 1,000 people detected nitrate at 12 mg/l (the MCL is 10 mg/l) in its only well. A repeat sample 24 hours later showed nitrate levels of 11.2 mg/l. The system monitors quarterly. Although nitrate levels have been high before, especially during the summer, they have never exceeded the MCL. The violation is probably due to agricultural practices–there are both dairy farmers and corn farmers in the region.

The group felt the handbook was easy to use and made developing the notice simple. They gave the following suggestions and ideas as they developed their notice.

- Use the word "Notice" instead of "Warning" at the top of the notice. (Handbook, p. 24)
- Operators of systems serving small communities could work with the local fire department to distribute the notice. (Handbook, Ch. 4)
- The group did not consider a nitrate exceedance to be a very serious violation, because high nitrate levels do not affect most people.
- The group thought that second languages would be important on this notice.
- The group suggested increasing monitoring and speaking with farmers in the area as potential solutions (however, they did not want to specifically identify farmers in the notice). (Handbook, p. 23)
- Other options to give consumers and/or to solve problem (for instructions), included: blending, increased sampling, ion exchange, reverse osmosis, rehabilitating wells, purchasing water, running new lines, or recommending consumers install a home filtration system. (Handbook, p. 23)

JUNE 9

Group 1-- *E. coli* MCL

Scenario: A large CWS serves 500,000 people itself and sells water to five suburban systems each serving 50,000. Eight samples taken three days ago were positive for total coliform. *E. coli*

bacteria were present in five repeat samples taken the day before yesterday. The water system uses a reservoir as its water source.

Given the large population served and the immediacy of the situation, the group constructed the following abbreviated notice, suitable for a 30-second TV/radio spot or a scroller:

> "Effective immediately: a boil water advisory has been issued for the [city] and [surrounding areas]. *E. coli* were found in the water supply. Coliforms can cause illness; *E. coli* may pose a special risk to immuno-compromised people, infants, and children. More information is available at [water system phone number]. Details to follow."

The group offered the following ideas on distributing Tier 1 notices.

If multi-lingual notices are needed, systems should plan for this ahead of time in order to guarantee that the notice will reach as many people as possible. Reaching non-English speaking populations in an emergency should be included in a community's emergency response plan. In a brief notice suitable for electronic distribution, a phone number for information in other languages should be included at the end of the notice.

The group agreed that in the retail-wholesale situation represented in the scenario, the recipient systems have responsibility for distributing the notice to their customers. In Pennsylvania, a purchased water source is considered to be no different than any other source, such as a well. The recipient, or consecutive system, is required to monitor purchased water before distributing it to its customers. The group did agree that the selling system should alert all purchasers immediately if a problem is identified.

Some operators expressed concern that the message a water company asks TV stations to run may not be the same as the message that appears on TV. This brought up the importance of forging relationships with the media ahead of time. Carl Reeverts explained that, under a memorandum of understanding with NOAA EAS, participating TV stations must display the exact message transmitted by State emergency management staff.

Brief messages (e.g., "water emergency - film at 11:00" news breaks or short scrollers) catch people's attention, but also leave them hanging. Operators expressed concern that they would be besieged with calls from reporters, or that news media may run inaccurate stories.

The required health effects language is far too lengthy for an electronic message such as a scroller or a 30 second spot on the news.

Is a news item a warning or the actual PN? That is, would a written notice with all ten required elements also be needed?

Notices are needed for bottlers such as grocery stores who bottle water straight from the tap with only additional carbon treatment. Similarly, it is important that restaurant operators understand that soda machines cannot be used during a water emergency. There is a common misconception that carbonation kills microbes.

Radio stations may be likely to give more time to a news story about the water system; TV scrollers could tell people to tune to certain radio stations for more information (similar to "snow day" broadcasts of school closing information).

In a Tier 1 situation, water system staff should personally contact hospitals, schools, and other places with large numbers of vulnerable people.

Follow-up mailings with complete information, especially where the problem is quickly resolved, are systems' best bet for communicating accurate information and restoring confidence in their product.

Is isolated PN acceptable in situations where only certain sections of the distribution system are affected?

Group 2 -- Surface Water Treatment Rule (Monthly Turbidity)

Scenario: A system of 100,000 that gets its water from a river had turbidity levels above 0.5 NTU in 10 percent of its samples. A treatment technique violation occurs when more than 5 percent of samples are over 0.5. The same violation occurred once three years ago.

- The group found the appropriate template to use fairly easily.
- Participants liked the idea of making templates stand out more by adding a border or a similar graphic.
- The handbook should include a stronger recommendation to consult with the state before issuing a public notice.
- The group did not agree with the suggestion about auto-phone dialing, citing concerns for non-English speakers and people hanging up on the message.
- The turbidity template should include the maximum turbidity level that was reached, as well as the triggering event (rain, rapid thaw, flood).

Group 3 -- Lead and Copper Rule

Scenario: A system of 45,000 exceeded the lead action level in 12 percent of samples taken during the six-month monitoring period ending in March, 1999. Although the system installed corrosion control in March 1998, it is still exceeding the action level. Before corrosion control

was installed, an average of 17 percent of samples exceeded the action level during several rounds of sampling. Public education was conducted on schedule during previous rounds. The system should have conducted a lead public education program by the end of May, 1999, but did not.

One issue that arose early in the discussion was whether or not systems can include the public education program with their notice. The group felt that it did not make much sense to send out a public notice that further public education would be conducted later. 40 CFR 141.85(c) requires community water systems exceeding the lead action level to insert notices in each customer's bill containing the required language in 141.85(a) (commonly printed as a brochure) along with the following alert on the bill itself in large print:

> SOME HOMES IN THIS COMMUNITY HAVE ELEVATED LEAD LEVELS IN THEIR DRINKING WATER. LEAD CAN POSE A SIGNIFICANT RISK TO YOUR HEALTH. PLEASE READ THE ENCLOSED NOTICE FOR FURTHER INFORMATION.

It is not clear whether a system, having missed the deadline for conducting a public education program, would have to wait for the next bill and include the above language in order to send out the brochures. If not, public education could be combined, and several of the required elements of the notice would not need to be addressed since they would be covered in the brochure. If public notification and public education could not be combined and a system sent out a notice and later the brochure, consumers might be confused. They might wonder why the system did not just send out the public education brochure to satisfy the requirement.

The group assumed that public education and notification could be combined. Because the system had previously exceeded the lead action levels and conducted lead education programs, the group assumed that consumers would already be familiar with the lead problem and would not need as much background. In addition, a lead education brochure would be included in the mailing. Lastly, corrosion control had already been installed but was not yet successful. For these reasons, the group decided it was necessary to deviate from the lead education template on page 58 of the handbook.

The group agreed the notice should mention that corrosion control has had some effect (e.g., "we are pleased to report that lead levels have decreased"). It should also discuss that further steps will need to be taken, although at this point in the scenario no schedule has been set for replacing lead service lines. The notice must also describe the violation by stating that the lead education program is required when the action level is exceeded, but the system is behind schedule. At this point, the notice should refer to the brochure, and mention that it includes steps consumers can take to reduce lead exposure and that other parts of the lead education program are being implemented (i.e., distribution to community centers, TV stations, etc.). The standard health effects language for lead must be included, even though more detailed health effects language will be provided in the brochure. Participants suggested prefacing the health effects language with, "Public education on lead is important to people in ___ Water Authority because. . ."

The group members thought the explanation of the action level was too complicated, and that trying to explain it at all was difficult. In their notice, they simply explained that lead levels in parts of the water system were high and that despite improvements, they were still exceeding the limit, or "action level."

Attachment 1
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Attachment 2
EPA Presentation on PN Rule

Attachment 3
Transcript of Presentation on PN Rule Public Comments/Questions

Attachment 4
Public Comment by Clean Water Action, Inc.

Attachment 5
Public Notices Created by Breakout Groups

The notices on the following pages were created by members of the breakout groups. The meeting report provides details on the breakout session discussions.

SWTR Failure to Filter Notice– June 8, Group 1

IMPORTANT INFORMATION ABOUT YOUR DRINKING WATER
The Maple Water System Does Not Meet Treatment Requirements

The Maple water system is treated before it reaches you. However, this treatment does not meet all the current State and Federal requirements for drinking water from surface sources. Based on the evaluation of this water system, PA DEP has determined that this system must meet surface water treatment requirements.

The water currently is treated with chlorine or other disinfectants to kill bacteria. However, disinfection does not always kill other disease-causing organisms, such as *giardia* and other parasites. Filtration is an effective way to remove such parasites. We are required to filter the water, but have not yet installed a filtration system.

What does this mean to me?

This is not an emergency. If it had been you would have been notified immediately. We do not know of any cases of contamination. However, until improvements are made, there is an increased chance that disease-causing organisms could contaminate the water supply.

Some people, including immuno-compromised people, some elderly, and infants may be at increased risk. These people should seek advice about drinking water from their health care providers. Guidelines on ways to lessen the risk of infection by microbes are available from the Safe Drinking Water Hotline at 1(800) 426-4791.

Inadequately treated water may contain disease-causing organisms. These organisms include bacteria, viruses, and parasites which can cause symptoms such as nausea, cramps, diarrhea, and associated headaches. These symptoms, however, are not caused only by organisms in drinking water, but also by other factors. If you experience any of these symptoms and they persist, you may want to seek medical advice.

What should I do?

You do not need to boil your water. However, if you have specific health concerns, consult your doctor. A home filter will not necessarily solve the problem, because not all home filters protect against parasites. Call NSF International at 1(800) NSF-8010 or the Water Quality Association at 1(800) 749-0234 for information on appropriate filters.

What is the water system doing?

Filtration is the best method to remove these organisms.

The Maple Water System is preparing to install three pressure filters. We expect the construction to start within the next three months. We expect to be operational by January of 2000.

We anticipate resolving the problem by [date.] Until filtration is installed, you will receive a notice similar to this every three months.

If you would like more information, please call Customer Service Office at 1-888-745-8325.

If other people, such as tenants, residents, patients, students, or employees, receive water from you, it is important that you provide this notice to them by posting it in a

Total Coliform Notice-- June 8, Group 2

IMPORTANT INFORMATION ABOUT YOUR DRINKING WATER

Tests in [month] Showed Presence of Coliform Bacteria

_____ system monitored for coliform bacteria during May. Of the 30 samples we took, 2 were tested positive for the presence of total coliform bacteria. The standard is that _____. Nine months ago, we informed you of a similar situation. This was resolved in one month; no adverse health effects were reported at that time.

What does this mean?

This is not an emergency. If it had been, you would have been notified immediately. Total coliform bacteria are generally not harmful themselves.

Coliforms are bacteria which are naturally present in the environment and are used as an indicator that other, potentially-harmful, bacteria may be present. Coliforms were found in more samples than allowed and this was a warning of potential problems.

Usually, coliforms indicate problems with the treatment and distribution systems. Some people such as immuno-compromised people may be affected.

What should I do?

You do not need to boil your water or take other corrective action. However, if you have specific problems, consult your doctor.

What did the water system do?

Chlorine levels were reduced due to high temperatures. In recent days, we increased chlorine levels. Further testing indicated the situation was resolved on [date].

For more information, please contact ___ at ____.

> If other people, such as tenants, residents, patients, students, or employees, receive water from you, it is important that you provide this notice to them by posting it in a conspicuous location or by direct hand or mail delivery.

Monitoring - Multiple Violations, Inclusion in CCR– June 8, Group 3

IMPORTANT INFORMATION ABOUT YOUR DRINKING WATER
Monitoring Requirements Not Met

Dear Customer:

Throughout 1999, we monitored for over 80 contaminants as required by State and Federal laws; however, during the months of July, October, and December, we did not completed our monthly monitoring for total coliform bacteria. We also did not monitor for volatile organic chemicals (VOC's) during the fourth quarter of 1999.

This is not an emergency. You do not need to boil your water or use an alternate source at this time.

Since the beginning of this year, the required samples have been taken. We have taken the necessary steps to ensure future samples are not missed. (Examples)

Because we did not monitor _____. However, at this time your water is safe to drink. (Use a statement to reassure customers about quality)

If other people, such as tenants, residents, patients, students, or employees, receive water from you, it is important that you provide this notice to them by posting it in a conspicuous location or by direct hand or mail delivery.

Nitrate Notice–– June 8, Group 4

WARNING

FOR PARENTS OF INFANTS 6 MONTHS AND YOUNGER

All persons served by [name of town] water

DO NOT USE THE WATER FOR INFANT FORMULA

A nitrate level of 11.6 mg/L was detected on June 8th, which exceeds the MCL of 10 mg/L. This is above the nitrate standard, or maximum contaminant level (MCL), of [state/federal MCL].

What does this mean to me?

- *Infants below the age of six months who drink water containing nitrate in excess of the MCL could become seriously ill and, if untreated, may die. Symptoms include shortness of breath and blue baby syndrome.* Blue baby syndrome is indicated by blueness of the skin.

Do not boil the water. Boiling, freezing, filtering, or letting water stand does not reduce the nitrate level. In fact, boiling water can make the nitrates more concentrated. Water, juice, and formula for children under six months of age should not be prepared with tap water. Bottled water or some other water low in nitrates should be used.

- Symptoms in infants can develop rapidly, with health deteriorating over a period of days. If symptoms occur in a child less than 6 months old, seek medical attention immediately.

- Continue to use bottled water for infants until further notice. Adults and children older than six months can drink the tap water. However, if you are pregnant or have specific health concerns, you may wish to consult your doctor.

- We learned of the nitrate levels on [date].

What is the water system doing?

- We have increased our monitoring. This is the first time we exceeded the standard; this is probably due to seasonal variations and we expect levels to decrease based on historical data.

- We will inform you when this problem has been corrected. We anticipate resolving the problem by [date.]

- For more information, please call the water system at 1-8-00-555-1212 or the health department at 1-888-555-1234.

  If other people, such as tenants, residents, patients, students, or employees, receive water from you, it is important that you provide this notice to them by posting it in a conspicuous location or by direct hand or mail delivery.

SWTR Turbidity Monthly Exceedance Notice---– June 9, Group 2

IMPORTANT INFORMATION ABOUT YOUR DRINKING WATER
Spruce Water System Did Not March Turbidity Standards

We routinely monitor for turbidity (cloudiness), which tells us whether we are effectively filtering and disinfecting the water supply.

During the month of March, 10 percent of turbidity levels were above 0.5 [or 0.3] turbidity units. The standard is that no more than 5 percent of samples may be above 0.5 [or 0.3] turbidity units. Turbidity levels never exceeded 1 NTU. During the month of March, several spring rainstorms contributed to this problem.

At the present time, the problem has been corrected and turbidity is at acceptable levels.

What does this mean to me?

This is not an emergency. If it had been, you would have been notified immediately.

Turbidity has no health effects. However, turbidity can interfere with disinfection and provide a medium for microbial growth. Turbidity may indicate the presence of disease causing organisms. These organisms include bacteria, viruses, and parasites which can cause symptoms such as nausea, cramps, diarrhea and associated headaches.

These symptoms are not caused only by organisms in drinking water and may be caused by other factors. If you experience any of these symptoms and they persist, you may want to seek medical advice.

Some people, including immuno-compromised people, some elderly, and infants may be at increased risk. These people should seek advice about drinking water from their health care providers. Guidelines on ways to lessen the risk of infection by microbes are available from the Safe Drinking Water Hotline at 1(800) 426-4791.

What should I do?

You do not need to boil your water. However, if you have specific health concerns, consult your doctor.

What is the water system doing?

[Describe corrective action.]

[Describe when you expect to return to compliance.]

For more information, call your water system at 1-888-555-1234.

> If other people, such as tenants, residents, patients, students, or employees, receive water from you, it is important that you provide this notice to them by posting it in a conspicuous location or by direct hand or mail delivery.

Lead Public Education Notice--– June 9, Group 3

IMPORTANT INFORMATION ABOUT YOUR DRINKING WATER
_____ Water System Did Not Conduct Lead Education Program

Dear Customer,

As we have discussed with you before, lead levels in some parts of the water system are high. We've installed treatment and we're pleased to report lead levels have decreased. However, we are still exceeding the limit, or "action level." We are pursuing additional steps to further reduce lead levels.

We are required to conduct a public educational program for lead; however, we are behind schedule. We have included a published educational brochure in this letter, which includes steps you can take to reduce exposure. We will distribute to whoever and broadcast on TV/radio. Pubic education on lead is important to people in the L.A. water authority because infants and children are at a greater risk to exposure.

What does this mean to me?

Infants and children who drink water containing lead in excess of the action level could experience delays in their physical or mental development. Children could show slight deficits in attention span and learning abilities. Adults who drink this water over many years could develop kidney problems or high blood pressure.

What is the water system doing?

We will conduct another lead education program next year if lead levels are still high.

This is not an emergency. If it had been, you would have been notified immediately. We anticipate meeting requirements for lead treatment by [date]. We will conduct another education program in one year if lead levels are still high.

For more information, contact ____ at _____.

If other people, such as tenants, residents, patients, students, or employees, receive water from you, it is important that you provide this notice to them by posting it in a conspicuous location or by direct hand or mail delivery.