Consumer Confidence Report Rule Web Cast: May 25, 2005
Question & Answer Document

Note: The statutory provisions and EPA regulations described in this document contain legally binding requirements. However, this document is not a regulation itself, nor does it change or substitute for those provisions and regulations. Thus, it does not impose legally binding requirements on EPA, states, or public water systems. This guidance does not confer legal rights or impose legal obligations upon any member of the public. While EPA has made every effort to ensure the accuracy of the discussion in this document, the obligations of the regulated community are determined by statutes, regulations, or other legally binding requirements.

Q.1 Is there a requirement for including notification about the availability of source water assessments on an annual basis?
A.1 Systems must include information about the availability of the most recent source water assessment information in the CCR each year. As new information becomes available this should also be included in the CCR.

Q.2 What value should we use when averaging in results below minimum reporting limits?
A.2 For purposes of averaging results, use the value reported by the laboratory even if this is below the detection limit. If the laboratory reported the value as non-detect use zero.

Q.3 If only regulated contaminants subject to an MCL, TT or AL, than is Chlorine required on the table of regulated contaminants?
A.3 The CCR requires reporting for contaminants subject to mandatory monitoring. It applies to contaminants subject to a MCL, action level, maximum residual disinfectant level (MRDL), or treatment technique. Information regarding contaminants subject to an MRDL may be included in the table with other detected contaminants or in a separate adjacent table.

Q.4 Is EPA considering reducing the yearly compliance to triennial for systems <10000 to reduce state workloads?
A.4 EPA does not plan to revise the CCR rule. EPA believes that all customers have a right to know about the quality of water they are served on an annual basis, regardless of system size.

Q.5 Isn't it true that contaminants with MRDLs must also be included in CCR?
A.5 Yes, please see answer three above.

Q.6 For secondary chemicals, if there is a detection but no exceedance of the MCL, how should they be reported if they are required to be reported?
A.6 Under federal requirements contaminants subject to a secondary maximum contaminant level, such as aluminum or color, are not required to be reported in the CCR. If a system chooses to include results of monitoring for contaminants subject to a secondary MCL they must do so in a separate table.

Q.7 Could you touch on requirement to include detected results for parameters for which there are no MCLs, but results exceed a health advisory or proposed MCL?
A.7 If a system has performed additional monitoring which indicates the presence of other

contaminants in the finished water, EPA strongly encourages systems to report any results which may indicate a health concern. To determine if results may indicate a health concern, EPA recommends that systems find out if EPA has proposed a National Primary Drinking Water Regulation (NPDWR) or issued a health advisory for that contaminant by calling the Safe Drinking Water Hotline (800-426-4791). EPA considers detects above a proposed MCL or health advisory level to indicate possible health concerns. For such contaminants, EPA recommends that the report include the results of the monitoring and an explanation of the significance of the results noting the existence of a health advisory or proposed regulation.

Q.8. On slide #49, is the MCL for TCR 2.0 or 1.0?
A.8 For systems collecting <40 total coliform samples per month, the MCL is 1 positive monthly sample.

Q.9. You stated that the units must be changed to make the MCL number greater than 1.0. Would this also apply to results such as turbidity, when a change of units does not make sense?
A.9You do not need to convert units for total coliform bacteria, fecal coliform, E. coli, total organic carbon, turbidity, radionuclides measured in mrem/year or pCi/L and asbestos. All others require a conversion of units. The conversion factors can be found in Appendix A to Subpart O.

Q.10 If no turbidity values exceeded 0.3 NTU, is reporting required?
A.10 For turbidity, when reporting is pursuant to 141.13, the highest monthly value is reported. When it is reported pursuant to 141.71, report the highest monthly value. When it is reported pursuant to 141.73, 141.173 and 141.551, the highest single measurement and the lowest monthly percentages of sample meeting turbidity limits specified. These values must be reported even if all measurements are less than 0.3 NTU.

Q.11 How do you account for Gross Alpha results having a +/- of say 2 or 3? If you take these as the extremes it may trigger further sampling.
A.11 Systems are required to report the entire analytical result to the state, including the standard deviation, however, compliance is determined by the running annual average of analytical results, which does not include the standard deviation. Therefore, systems do not add the confidence interval to their result, unless they are substituting gross alpha results for either radium-226 or uranium. In this case, the gross alpha result shall have a confidence interval of 95% (1.65 sigma, where sigma is the standard deviation of the net counting rate of the sample). Therefore, only if a system uses the results for substitution, could the standard deviation of the analytical result possibly trigger increased monitoring.

Q.12 What about reporting investigative sample results in the CCR - are they required to be reported?
A.12 Under federal requirements, only samples collect for the purpose of compliance need be reported in the CCR.

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Q.13 Toc clarification?
A.13 Unable to answer, incomplete question.

Q.14 When is TOC required to be reported in CCR?
A.14 Federal CCR regulations require reporting if TOC was detected and information about any violations that have occurred. In order to provide context for customers, EPA recommends systems use the percent removal achieved for the reported value and specify the percent removal required for the treatment technique level in the contaminant table. Systems may report this information in a separate adjacent table.

Q.15 only if they opt to use the waiver - they can mail it if they want
A.15 Comment noted.

Q.16 This question is about reporting TCR. If a single water company operates multiple small systems (deep wells) in the state (in our case the islands) and serves more than 70,000 customers, does the company report a percent value or TCR positives for each small system?
A.16 For routine monitoring, all public water systems must collect total coliform samples at sites which are representative of water throughout the distribution system according to a written sample siting plan. The routine monitoring established for compliance purposes for your example system will determine how TCR results are reported in the CCR. If the system in your example is required to collect 40 or more samples each month for compliance with the TCR rule, the system must report in the CCR the highest monthly percentage of positive samples. If the system collects fewer than 40 samples per month for compliance with TCR requirements, the system must report the highest monthly number of positive samples in the CCR.

Q.17 Do all systems that chlorinate include an MRDL in the table?
A.17 The only information related to MRDLs that must be reported under the federal CCR rule is whether or not an MRDL was detected and if a violation occurred. However, systems may want to provide context for customers, such as the MRDL, MRDLG and the level found. EPA's recommended approach for reporting MRDL information would be to use the same format in the regulations that is used for reporting contaminants subject to an MCL. For example, when compliance with an MRDL is determined on a system-wide basis by calculating a running annual average (RAA) of all samples at all sampling points (e.g., chlorine and chloramines), systems may report the average and range of detection. When compliance with an MRDL is based on individual results at each sampling point (e.g., chlorine dioxide), systems may report the highest detected level at any sampling point and the range of all sampling points. This information should be included in the main contaminant table or in an separate adjacent table.

Q.18 Will the CWS be considered in compliance and making a good faith effort if errors in the CCR are traced to inaccurate publishing by the local paper?
A.18 EPA would consider the systems to be making a good faith effort if errors were attributed

to inaccurate publishing by a local newspaper. EPA would expect the CWS to have the local paper publish a correction of any inaccurate information due to publishing errors. A CWS should check with the primacy agency to verify any specific requirements the primacy agency may have for this situation.

Q.19 Aren't the definitions of MRDL and MRDLG required now as well?
A.19 A community water system (CWS) must provide all applicable definitions in the CCR. This assists customers in understanding acronyms and technical terms. If a CWS is not reporting contaminant detects related to an MRDL and MRDLG in their CCR they can eliminate these definitions in order to avoid customer confusion and to save space in the CCR.

Q.20 It was previously stated that data that is more than 5 years old is not required to be reported. However, sampling is not required within five years (e.g., new radionuclide rule may allow for systems sampling once every six or nine years), what must be reported or is reporting for that contaminant required at all?
A.20 Federal CCR requirements specify that systems that are allowed to monitor for regulated contaminants less often than annually must include the results from the most recent sampling, the year the testing was conducted and a brief statement indicating the data is from the most recent testing done in accordance with the regulations. No data older than 5 years need be included. EPA acknowledges that under certain conditions monitoring for inorganics, organics (e.g., waivers) and radionuclides may occur once every six or nine years. Therefore, EPA strongly encourages systems to report monitoring results for detected contaminants for the last round of sampling even if the results are more than 5 years old. Systems should check with their primacy agency to determine if requirements are more stringent than federal regulations.

Q.21 Will either of the 2 upcoming rules (Stage 2 or LT2) add different requirements on the CCR?
A.21 The Stage 2 and LT2 rules have not been finalized to date. However, the proposed Stage 2 rule includes proposed amendatory language to the CCR rule. For Stage 2, the proposed amendatory language to 40 CFR 141.153(d)(4)(iv) is as follows:
(B) When compliance with the MCL is determined by calculating a running annual average of all samples taken at a sampling point: the highest average of any of the sampling points and the range of all sampling points expressed in the same units as the MCL. For the MCLs for TTHM and HAA5 in Sec. 141.64(b)(2) and (3), systems must include the highest locational running annual average for TTHM and HAA5 and the range of individual sample results for all sampling points expressed in the same units as the MCL. If more than one site exceeds the MCL, the system must include the locational running annual averages for all sites that exceed the MCL.
(C) When compliance with the MCL is determined on a system-wide basis by calculating a running annual average of all samples at all sampling points: the average and range of detection expressed in the same units as the MCL. The system is not required to include the range of individual sample results for the IDSE conducted under subpart U of this part.
Note: Any proposed revisions to the CCR rule are not final and are subject to change until the Stage 2

rule is finalized.

Q.22 For TCR, if a system did monitoring and all results were non-detect, does the system have to report in the CCR for TCR (save space)?

A.22 Under federal regulations for CCR, only detected contaminants must be reported. If all TCR samples for the entire year of the report were negative, the system does not need to include this information in the contaminant tables.

Q.23 What about MRDL and TOC requirements? How are these to be reported?

A.23 The only information related to MRDLs that must be reported under the federal CCR rule is whether or not an MRDL was detected and if a violation occurred. However, systems may want to provide context to customers, for example the MRDL, MRDLG and the level found. EPA's recommended approach for reporting MRDL information would be to use the same format in the regulations used for reporting contaminants subject to an MCL. For example, when compliance with an MRDL is determined on a system-wide basis by calculating a running annual average (RAA) of all samples at all sampling points (e.g., chlorine and chloramines), systems may report the average and range of detection. When compliance with an MRDL is based on individual results at each sampling point (e.g., chlorine dioxide), systems may report the highest detected level at any sampling point and the range of all sampling points.

Only TOC detects and treatment technique violations must be reported in the CCR. However, for systems reporting TOC, EPA recommends they report it as a percent removal. The below example for TOC is for a conventional surface water treatment system with source water TOC between 4-8 mg/L and with a source water alkalinity between 50-120 mg/L:

	MCL	MCLG	Level Found	Range	Sample Date	Violation	Typical Source
TOC	TT	N/A	40% removal (35% required)	30-45%	Samples taken quarterly	No	Naturally present in the environment

Q.24 expand on the Type 72 violation - some examples?

Q.24 For purpose of reporting violations to the Safe Drinking Water Information System (SDWIS) type 72 violations relate to adequacy, availability and content of reports. A CCR Adequacy/Availability/Content Violation occurs when the community water system fails to include the required language, content, and/or meet the requirements to make reports available to the public as specified in the rule. This type of violation means that the CCR has met some but not all of the requirements for either report content or distribution. Failure to

provide certification to the State within 3 months of the CCR due date that the report contained correct information and was distributed in accordance with the rule is also a minor Adequacy/Availability/Content Violation.

Q.25 How detailed does the discussion on susceptibility have to be? Does it have to mention the level of susceptibility (hi, med, low)?

A.25 If a source water assessment has been completed, the report must notify consumers of the availability of this information and the means to obtain it. Systems are encouraged to highlight significant sources of contamination in the source water area if the information is readily available. Where a system has received a source water assessment from the primacy agency, the CCR must include a brief summary of the system's susceptibility to potential sources of contamination, using language provided by the primacy agency or written by the operator.

Q.26 If radon is to be reported outside of the main contaminant table, then are you to report only the results obtained in the last calendar year?

A.26 If the system has performed any monitoring for radon which indicates that radon may be present in the finished water, the report must include the results of the monitoring and an explanation of the significance of the results. Federal regulations do not specify the time period for reporting radon. EPA recommends reporting radon similarly to unregulated contaminant monitoring – include radon results in the report covering the calendar year that monitoring was conducted.

Q.27 Does the chlorine residual have to be reported?

A.27 Please see answer A.17

Q.28 How and where do we get a copy of the iWriter?

A.28 The CCRiWriter is a free web based program. You can access the program at www.ccriwriter.com. You will need to establish a user identification and password. This allows users to securely store their information. If you do not have internet access, you can order a CD-ROM version of the CCRiWriter by calling the Safe Drinking Water Hotline at 1-800-426-4791.

Q.29 Are the MCL UOMs always the same as UOM in Appendix A?

A.29 For purposes of answering this question, we are assuming UOM = unit of measure. The MCL units and the units required to be reported in CCR are not always the same. The table in Appendix A to Subpart 0 shows the conversion factor to convert MCL units into CCR units.

Q.30 This iWriter is only good for EPA requ and not stricter state requ...correct?

A.30 The CCRiWriter allows the user to develop and print a CCR that complies with all federal requirements. The CCRiWriter does have features that allow users the flexibility to add additional information required by primacy agencies. For example, users can use the "additional contaminant information" screen to report contaminants that have a stricter state MCL or are not regulated under federal requirements but are under state regulations.

Q.31 New radiological rule allows monitoring every 9 years. Is this software program going to be modified to allow data older than 5 years?

A.31 Federal CCR requirements specify that systems that are allowed to monitor for regulated contaminants less often than once a year must include the results from the most recent sampling, the year the testing was conducted and a brief statement indicating the data is from the most recent testing done in accordance with the regulations. No data older than 5 years need be included. EPA acknowledges that under certain conditions monitoring for inorganics, organics (e.g., waivers) and radionuclides may occur once every six or nine years. Therefore, EPA strongly encourages systems to report monitoring results for detected contaminants for the last round of sampling even if the results are more than 5 years old. The CCRiWriter has been modified to allow users to enter the date results were collected even if it is more than 5 years old.

Q.32 Do you recommend that non-EPA regulated contaminants such as MTBE be mentioned in the CCR?

A.32 If the system has performed additional monitoring which indicates the presence of other contaminants in the finished water, EPA strongly encourages systems to report any results which may indicate a health concern. To determine if results indicate a health concern, find out if EPA has proposed a NPDWR or issued a health advisory. EPA considers detects above a proposed MCL or health advisory level to indicate possible concern. To report such contaminants, do so in a separate table and include the results of monitoring and an explanation of the significance of the results noting the existence of a health advisory or proposed regulation.

Q.33 If the system has a failure to monitor violation, does the CCR need to include health effects language for the contaminant that was not sampled?

A.33 The report must note any violation that occurred during the year covered by the report of requirements (including monitoring and reporting of compliance data), and include a clear and readily understandable explanation of the violation, any potential adverse health effects, and the steps the system has taken to correct the violation.

Q.34 Can you define independent hydraulic systems?

A.34 MultiWater companies that have two or more completely separate water systems (different sources, treatment facilities, storage and distribution piping) that at no time physically interconnect or share any treatment facilities, storage facilities, or distribution piping.

Q.35 Can you provide agencies the link to the CCRiWriter so that we can make this available to PWSs?

A.35 The CCRiWriter is a free web based program. You can access the program at www.ccriwriter.com. Users will need to establish a user identification and password. This allows users to securely store their information. If you do not have internet access, you can order a CD-ROM version of the CCRiWriter by call the Safe Drinking Water Hotline at 1-800-426-4791.

Q.36 Can you please explain the Multiple water sources options.

A.36 Federal CCR requirements allow community water systems to issue one report for multiple sources, however, they must show results from each source in a separate column in the detected contaminants table. The CCRiWriter program does not have the ability to create a single table for multiple sources. Therefore, CCRiWriter users would need to create a complete CCR for each source.

Q.37 What about susceptibility? Does this program address it?

A.37 The CCRiWriter allows users to enter information related to source water assessments. The "Create Report" feature of the CCRiWriter provides a section title "Source water assessment and its availability" and a text box for users to enter information related to their source water assessment and its availability. The program does not provide any standard language, since there is no mandatory language in the federal regulations. Users may enter any appropriate information, including susceptibility, into the text box for inclusion in the final report.

Q.38 Where can the desk top version of the CCRiWriter be obtained?

A.38 If you do not have internet access, you can order a CD-ROM version of the CCRiWriter by calling the Safe Drinking Water Hotline at 1-800-426-4791. EPA recommends users with internet access utilize the web based program. The web based program is updated on a regular basis based on user suggestions and input.

Q.39 In Specify-Report Language - Does free flow wording automatically convert to Spanish

or French as selected?

A.39 The language translation feature of the CCRiWriter does not convert the entire report to another language (Spanish or French). The program only provides translation for the following

statement "This report contains important information about your drinking water. Have someone translate it for you, or speak with someone who understands it."

Q.40 How long do report the swap information? It will be out of date at some point.

A.40 If a source water assessment has been completed, systems must notify consumers of the availability of this information and the means to obtain it. Where a system has received a source water assessment from the primacy agency, the report must include a brief summary of the systems susceptibility to potential sources of contamination, using language provided by the primacy agency or written by the operator. This is an annual requirement. EPA encourages systems to include supplemental information, such as information obtained during a sanitary survey, protection efforts under taken by the system and opportunities for community involvement in source water protection efforts.

Q.41 Will the link for the CCRiWriter be available to the public?

A.41 The CCRiWriter is available on a publically accessible web site. However, users must establish a user identification and password. Therefore, all information entered by a water system is securely protected. The public will not have access to water system information. Community water systems who wish to make their CCR available to the public can link their CCR to EPA's CCR online catalog by using the online form, at: http://yosemite.epa.gov/ogwdw/ccr.nsf/CCR?OpenForm.

Q.42 We didn't know about this presentation - Where can this program be found and what is its name? Is it available for public usage?

A.42 Please see answers 35 and 41.

Q.43 How can we access CCRiWriter?

Q.43 Please see answer 35.

Q.44 Reporting of TTHM and HAA5 and chlorine residual, is it only required reporting if the MCL is exceeded? If the MCL is not exceeded and the systems do want to report the results should it be in a separate table?

A.44 Detected contaminants subject to an MCL, such as TTHM and HAA5, found at or above minimum detection limits must be reported in the CCR. Under federal CCR regulations, community water systems must report detected regulated contaminant levels whether or not an

MCL violation has occurred. The information may be included in the main contaminant table or in a separate adjacent table. See A.17 for information on reporting chlorine residual.

Consumer Confidence Report Rule Web Cast: May 25, 2005
Question & Answer Document

Q.45 Can you change the report after you have printed it and closed your session?

A.45 The CCRiWriter allows users to download and save completed reports in rich text format (rtf), which can be opened with word processing software such as MS Word or WordPerfect, or html formats. The user can modify downloaded and saved reports in rtf using their word processing software. Reports can also be accessed and modified within the CCRiWriter program. Users will then need to re-download and save revised reports in order to print the CCR.

Q.46 Are there any plans to streamline the CCR rule to make it simple/stupid? For example we shouldn't have 2 deadlines.

A.46 EPA does not have plans to this time to revise the CCR rule. EPA continues to provide guidance and tools, such as the CCRiWriter, to assist systems in meeting CCR requirements.

Q.47 Is it possible to correct the grammar in the default text box regarding possible contaminant sources? It reads fine in bullet format but becomes a sentence fragment when written out for the report.

A.47 The CCRiWriter program has been modified to correct the grammatical error that occurred when bulleted information is printed as a sentence. The stored language regarding possible contaminant sources has been changed to a sentence format.

Q.48 Will the Q&As be posted on the Encounter web site or the EPA web site? If Encounter website, do we need an ID or password?

A.48 The Q&A documents will be posted on EPA's drinking water academy web site at: http://www.epa.gov/safewater/dwa/electronic/ematerials.html#npdwr

Q.49 I think this is an excellent risk communication webcast, and I was wondering if there is a recorded version of this training available.

A.49 An audio version of today's presentation is not available. However, the presentation slides for the CCR training, as well as other presentations in the web cast series, are available on EPA's Drinking Water Academy web site at: http://www.epa.gov/safewater/dwa/electronic/ematerials.html#npdwr

Q.50 Where on the drinking water academy's web site can we find the previous web cast

handouts and Q&A?

Q.50 Previous webcast presentations and handouts can be found on the EPA's Drinking Water

Academy web site at:
http://www.epa.gov/safewater/dwa/electronic/ematerials.html#npdwr.

Some of them have been a bit challenging and so they are taking longer than expected.