

TIMELY INFORMATION

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WHAT ARE CONSUMER CONFIDENCE REPORTS (CCRs)?

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On August 19, 1998 the U.S. Environmental Protection Agency published the final rule requiring every community water system (CWS) to prepare and provide customers an annual consumer confidence report (CCR). This rule was mandated by the 1996 amendments to the Safe Drinking Water Act. A CCR is a report card for customers on the quality of the water delivered by

their water system.

CCRs Due Annually

The CCR rule requires community water systems to mail to each customer a report on the level of contaminants in the drinking water. Key implementation dates are summarized in Table 1.

Table 1. Key Implementation Dates

Aug. 19, 1998	Final CCR published in <i>Federal Register</i>
Sept. 18, 1998	Effective date of CCR rule
Oct. 19, 1999	First CCR must be delivered
July 1, 2000	Second CCR must be delivered
July 1 annually	Subsequent CCRs must be delivered
Aug 19, 2000	Deadline for state primacy ¹ agencies to adopt CCR regulations

¹ The state primacy agency in Alabama is the Alabama Department of Environmental Management.

The first CCR must be issued by Oct. 19, 1999; the second by July 1, 2000; and subsequent reports by July 1 thereafter. A CCR summarizes data for the previous calendar year; hence, the first CCR will summarize information from calendar year 1998.

A new CWS must deliver its first report by July 1 of the year after its first full calendar year in operation and annually thereafter.

Community water systems that sell water to other systems must deliver the applicable information required for a CCR to the buyer system no later than April 19, 1999, by April 1, 2000, and by April 1 annually thereafter.

CCR Content Specified

Each CCR must include the following information:

* The source water type(s), commonly used name(s), and location(s).

* The USEPA-specified definition of the terms "maximum contaminant level goal" (MCLG) and "maximum contaminant level" (MCL).

* Water systems operating under a variance or exemption must include the USEPA-specified definition for "variances and exemptions."

* CCRs containing data on a contaminant for which USEPA has set a "treatment technique" or an "action level" must include the USEPA-specified definition for these terms.

* Information tables on detected contaminants, including contaminants subject to an MCL, action level, or treatment technique (regulated contaminants); contaminants subject to monitoring only (unregulated contaminants); and disinfection by-products or microbial contaminants monitored under the Information Collection Rule that are detected in finished water. For regulated contaminants, tables are to include the MCLG, MCL, action level or treatment technique, and the level of the contaminant in the water system. For any regulated contaminant for which there has been a violation of the MCL during the year covered by the report, USEPA-specified health language must be included. The rule specifies how data is to be presented, with specific instructions for reporting and explaining results for turbidity, lead and copper, total and fecal coliform, *Cryptosporidium*, radon, arsenic, nitrate, and any other contaminants. If the system distributes water through multiple independent distribution systems fed by different source waters, separate columns are to be included for each service area, or a separate CCR may be produced for each service area.

* The likely source(s) of detected contaminants to the best of the operator's knowledge must be included. Specific

information regarding contaminants available in sanitary surveys and source water assessments should be used when available to the operator. If the operator lacks specific information on the likely source, the CCR must include one or more of the typical sources for that contaminant listed in the CCR rule.

* The CCR must note any violation of National Primary Drinking Water Regulations that occurred during the year covered by the report. USEPA-specified language must be included for surface water systems failing to install filtration or disinfection, for systems that fail to comply with lead and copper requirements, and for systems violating the treatment technique requirements for acrylamide and epichlorohydrin.

* If the system is operating under a variance or exemption, the CCR must include the reasons for the variance or exemption, the date it was granted, and a status report on the steps the system is taking to comply with the terms and schedules of the variance or exemption.

* An explanation regarding contaminants that may reasonably be expected to be found in drinking water, including bottled water. USEPA-specified language may be used or systems may use their own comparable language.

* USEPA-specified language that the presence of contaminants in drinking water does not necessarily indicate that the drinking water poses a health risk and that more information about contaminants and potential health effects can be obtained by calling the Safe Drinking Water Hotline (800/426-4791).

* CCRs must include the telephone number of the owner, operator, or designee of the CWS as a source of additional information concerning the report.

* Where the state primacy agency determines there is a large proportion of non-English speaking residents, CCRs

must contain information in the appropriate language(s) regarding the importance of the report or contain a telephone number or address where these residents may contact the system to obtain a translated copy of the report or assistance in the appropriate language.

* CCRs must include information about opportunities for public participation in decisions that may affect the quality of the water, such as time and place of regularly scheduled board meetings.

* USEPA-specified language must be included to address people that may be more vulnerable to contaminants in drinking water than the general population.

* Water systems may include additional information as they deem necessary for public education consistent with, and not detracting from, the purpose of the CCR.

Delivery Effort to Reach All Customers

Systems must make a good faith effort to reach consumers who do not get water bills, using means recommended by the state primacy agency. This includes customers who are served by the system but are not bill-paying customers, such as renters or workers.

Methods could include posting the reports on the Internet, mailing to postal patrons in metropolitan areas, advertising the availability of the report in the news media; publication in a local newspaper; posting in public places such as cafeterias or lunch rooms of public buildings; delivery of multiple copies for distribution by single-biller customers such as apartment buildings or large private employers; delivery to community organizations.

CCRs must be made available to the public upon request, and sent to the state primacy agency at the time of distribution to customers. Water systems must retain a copy of each CCR for five years after

distributing it. Systems serving 100,000 or more persons must post their current year's report at a publicly accessible site on the Internet.

The governor of a state may decide to not apply the direct mailing requirement to community water systems serving fewer than 10,000 persons. These systems would be required to inform their customers that the system will not be mailing the report; and they would be required to make the report available on request to the public and to publish the report annually in one or more local newspapers serving the areas in which their customers are located.

Community water systems not required to meet the direct mailing requirements, and which serve 500 persons or fewer, can meet their CCR obligation by preparing an annual report, making it available on request, and providing notice of its availability at least once per year to each customer by mail, by door-to-door delivery, by posting, or by any other means authorized in the regulations.

USEPA has estimated the "bare bones" minimum cost that might be incurred by the average system to comply with this rule from \$50 (for systems serving < 500 persons) to \$3,400 (for large systems). This estimate does not include the cost of embellishments that most systems will reasonably find desirable, but that are not required. The agency estimates the average compliance cost per system at \$442; systems should anticipate higher costs.

State primacy agencies may establish by rule alternative requirements with respect to the form and content of the CCRs. State changes to the CCR rule may decrease or increase compliance costs, depending on whether state requirements

are more or less stringent.

For More Information and Help

Several compliance tools are available to help utilities comply with the CCR rule. American Water Works Association (AWWA) has prepared a CCR handbook that contains a detailed look at USEPA's requirements. The handbook includes a complete explanation of what the rule requires, AWWA CCR focus groups' highlights and recommendations, and example CCRs. Check AWWA Web site at:

< <http://www.awwa.org/ccrmain.htm> > .

AWWA's *CCRbuilder* helps utilities work their way through the regulations to create a CCR that includes all legal language and required elements. The Internet-based program (www.ccrbuilder.com) generates a camera-ready report that the utility can take to a printer or copy center. CCRs will be automatically posted to the Internet at no extra cost.

Other tools available from AWWA include a CCR public service announcement and a video, *Water Quality Reports: We Want You to Know*. These can be used to let consumers know what CCRs are. Call the AWWA Bookstore at 800/926-7337.

Reference

Pontius, Fred. 1998. Rule mandates consumer confidence reports. *Opflow*. Vol. 24 (10): 6-7. American Water Works Association. Denver, CO.