

Directions for Completing Your Consumer Confidence Report Using the Template

This template is designed to assist you in creating your **Consumer Confidence Report (CCR)**. It allows you the flexibility needed for the specific requirements of your utility. The CCR requires that certain items and specific language be included in all reports. These items are clearly marked in the template. Throughout this template you are given several carefully worded choices in order to “*personalize*” your utility’s report to your customers. Please consider carefully what you wish to say. *How* you say something to your customers is as important as *what* you say. Take advantage of this regulation to put forth a positive public relations image of your system, the quality of the product you serve and the professionalism of your board and personnel.

These directions will guide you through the template. It allows you the opportunity to choose what you want to say from the accompanying **Consumer Confidence Report Template**. The template is designed to be used in one of three ways:

1. To delete the undesired language.
2. To copy and paste using your own word processing software.
3. To manually type in the desired selections.

Each State Primacy Agency may require state specific language that may not be included in this template. State specific language may be obtained from your State Primacy Agency. Call them or your State Rural Water Association for assistance.

If you have obtained a diskette from your state rural water association, we recommend you make a backup copy of this disk for file.

As you consider the choices in the template, pay close attention to the difference between violations and detects. Detects are required to be reported however do not require as much detailed information as a violation of a maximum contaminant level (MCL).

Report Delivery and Record Keeping.

1. Each community water system must mail or otherwise home-deliver one copy of the report to each customer. The first report must be delivered by October 19, 1999. The report must contain data collected during or prior to calendar year 1998. The second report must be delivered by July 1, 2000 and subsequent reports by July 1 annually.
2. The system must make a good faith effort to reach consumers who do not get water bills, using means recommended by the primacy agency. For example the system could post the report in a public place such as a post office or the internet.
3. A community water system that sells water to another community water system must deliver the applicable information to the buyer system no later than April 19, 1999 and by April 1, 2000. Then by April 1 annually or on a date mutually agreed upon by the seller and purchaser, and specifically included in a contract between the parties.

4. No later than the date the system is required to distribute the report to its customers, each community water system must mail a copy of the report to the Primacy Agency, followed within three months by a certification that the report has been distributed to customers, and that the information is correct and consistent with the compliance monitoring data previously submitted to the Primacy Agency.

If the State waives the mailing requirement for systems fewer than 10,000 persons and your system chooses not to mail a report to every customer you must:

1. Publish the report in one or more local newspapers serving the area in which the system is located;
2. Inform the customers that the reports will not be mailed, either in the newspapers in which the reports are published or by other means approved by the state; and
3. Make the reports available to the public upon request

Systems serving 500 or fewer persons who choose not to mail the report to every customer may forego the requirements of 1 and 2 above if they provide notice at least once per year to their customers by mail, door-to-door delivery, or by posting in an appropriate location that the report is available upon request. (The system is still **required to create the report** and comply with all other provisions of the regulation.)

The report must be retained for no less than 5 years.

The Template Instructions

For each of the following sections, **consider if they apply to your utility's situation** and then choose the language that best fits your need. It is recommended that the optional language be included in your report where appropriate.

Section 1.

There is no required language in this section. ***This is a great opportunity for you to set a positive tone for the entire report.*** Remember, when deciding on a title for your report keep in mind that the title will be the first impression your customers will have of the report and perhaps even your utility! When customers or even the media mention the report it will be by the name you have given it.

Section 2.

Your introduction is the key! You control the message here! This may be the first time many of your customers have read anything descriptive about your utility. The regulation **REQUIRES** you to provide the type and location of the water source. The regulation also **REQUIRES** that if **you** have a source water assessment plan you must include a statement informing the consumers of the availability of the information and means to obtain it. If the system has received a source water assessment from the primacy agency, you must include a brief summary of the system's susceptibility to potential sources of contamination, using language provide by the primacy agency or written by the operator.

You may wish to expand on the examples in Section 2 and provide additional information on your system such as:

- Why you are providing this report
- General information about your water utility
- New construction or modifications
- How many miles of new lines
- How many new customers added
- New or improved treatments
- Operator professionalism (certification, training or other staff achievements)

Section 3.

Include a quote from an official (Mayor, Board President or Manager) about your drinking water.

Two examples are given. Use one of these or one of your own.

Section 4.

Your system should offer to answer *ANY* questions itself. If a customer is confused or misinformed give your utility the opportunity to clarify things. . . *don't leave it up to chance!* The regulation **REQUIRES** that the telephone number of the owner, operator or designee be included along with the time and place of regularly scheduled board meetings.

Section 5.

The regulation **REQUIRES** that the data be derived from data collected during calendar year 1998 for the first report and subsequent calendar years thereafter.

If your system is allowed to monitor for regulated contaminants less often than once a year, the table is **REQUIRED** to include the date and results of the most recent sampling and a brief statement indicating that the data presented in the report are from the most recent testing done in accordance with the regulations.

Section 6.

For each constituent that is detected or is a violation, the level detected, unit of measurement, the MCLG, the MCL and the likely source of contamination is **REQUIRED** to be reported in a Test Results Table format (see section 7). This section provides definitions of the units of measurement. Include the paragraph and appropriate definitions of the unit of measurement for any constituent or detect you report in the Test Result Table.

Section 7.

If there were any violations of the Safe Drinking Water Act (SDWA) or any detection of any constituent in the **finished** water results, these are **REQUIRED** be reported in whole numbers, or “CCR Units” in the Test Results Table of your report (see below for details on whole numbers). If there is no MCL for a detected contaminant, the table must indicate that there is a treatment technique, or specify the action level, applicable to that contaminant, and the definitions for treatment technique and/or action level, as provided in Section 6.

Where a system is allowed to monitor for regulated contaminants less often than once a year, the table is **Required** to include the date and results of the most recent sampling and a brief statement indicating that the data presented in the report are from the most recent testing done in accordance with the regulations. Test results that are five years old or more should not be used in this report.

Reporting in Whole Numbers

The table below is for informational purposes only. It shows how EPA has calculated MCLs in whole numbers, or “CCR Units”. This table is not required to be printed in the system’s report.

The regulation **requires** that test results be reported in whole numbers, or “CCR Units” (i.e. 1 or greater). Test results are usually expressed as decimals (i.e. 0.08 mg/l - milligrams per liter which is the same as parts per million). Column A of the below table lists each of the constituents, Column B shows the multiplier for that constituents, and column C shows the MCL in whole numbers as calculated by the EPA.

Special Note: The results of sample analysis placed in the table must be in the same units as the MCL. This may mean that the value is less than 1.0 and this is as it should be reported. For example if a sample analysis for nitrate is 0.2mg/l it should be reported as 0.2mg/l in the table to match the CCR units that the nitrate MCL is expressed as. In other words, if you use the multipliers in the directions and your end results are less than one, then use the fractional or decimal value obtained. The whole number rule does not apply.

Systems can use this table to convert their test results to whole numbers, or “CCR Units”.

1. Find the contaminant in column A.
2. Multiply test result by the number in column C.
3. This number will be the test result measurement expressed as a whole number, or “CCR Unit”. This would be the number you place in the Test Results Table in the report.

Example: A system’s test result for Antimony is 0.002 mg/l. This will have to be converted to a whole number as follows: $0.002 \text{ mg/l} \times 1000 = 2$ parts per billion or micrograms per liter.

Key

AL=Action Level

MCL=Maximum Contaminant Level

MCLG=Maximum Contaminant Level Goal

MFL=million fibers per liter

mrem/year=millirems per year (a measure of radiation absorbed by the body)

NTU=Nephelometric Turbidity Units

pCi/l=picocuries per liter (a measure of radioactivity)

ppm=parts per million, or milligrams per liter (mg/l)

ppb=parts per billion, or micrograms per liter

ppt=parts per trillion, or nanograms per liter

ppq=parts per quadrillion, or picograms per liter

TT=Treatment Technique

A	B X	C =	D
Contaminant	MCL in compliance units (mg/L)	multiply by...	MCL in CCR units
Microbiological Contaminants			
1. Total Coliform Bacteria	-	-	presence of coliform bacteria in 5% of monthly samples
2. Fecal coliform and <i>E. coli</i>	-	-	a routine sample and a repeat sample are total coliform positive, and one is also fecal coliform or <i>E. coli</i> positive
3. Turbidity	-	-	TT (NTU)
Radioactive Contaminants			
4. Beta/photon emitters	4 mrem/yr	-	4 mrem/yr
5. Alpha emitters	15 pCi/l	-	15 pCi/l
6. Combined radium	5 pCi/l	-	5 pCi/l
Inorganic Contaminants			
7. Antimony	.006 mg/l	1000	6 ppb
8. Arsenic	.05 mg/l	1000	50 ppb
9. Asbestos	7 MFL	-	7 MFL
10. Barium	2 mg/l	-	2 ppm
11. Beryllium	.004 mg/l	1000	4 ppb
12. Cadmium	.005 mg/l	1000	5 ppb
13. Chromium	.1 mg/l	1000	100 ppb
14. Copper	AL=1.3 mg/l	-	AL=1.3 ppm
15. Cyanide	.2 mg/l	1000	200 ppb
16. Fluoride	4 mg/l	-	4 ppm
17. Lead	AL=.015 mg/l	1000	AL=15 ppb
18. Mercury (inorganic)	.002 mg/l	1000	2 ppb
19. Nitrate (as Nitrogen)	10 mg/l	-	10 ppm
20. Nitrite (as Nitrogen)	1 mg/l	-	1 ppm
21. Selenium	.05 mg/l	1000	50 ppb
22. Thallium	.002 mg/l	1000	2 ppb
Synthetic Organic Contaminants including Pesticides and Herbicides			
23. 2,4-D	.07 mg/l	1000	70 ppb
24. 2,4,5-TP [Silvex]	.05 mg/l	1000	50 ppb
25. Acrylamide	-	-	TT
26. Alachlor	.002 mg/l	1000	2 ppb
27. Atrazine	.003 mg/l	1000	3 ppb
28. Benzo(a)pyrene [PAH]	.0002 mg/l	1,000,000	200 ppt
29. Carbofuran	.04 mg/l	1000	40 ppb
30. Chlordane	.002 mg/l	1000	2 ppb

31. Dalapon	.2 mg/l	1000	200 ppb
32. Di(2-ethylhexyl)adipate	.4 mg/l	1000	400 ppb
33. Di(2-ethylhexyl)phthalate	.006 mg/l	1000	6 ppb
34. Dibromochloropropane	.0002 mg/l	1,000,000	200 ppt
35. Dinoseb	.007 mg/l	1000	7 ppb
36. Diquat	.02 mg/l	1000	20 ppb
37. Dioxin [2,3,7,8-TCDD]	.00000003 mg/l	1,000,000,000	30 ppq
38. Endothall	.1 mg/l	1000	100 ppb
39. Endrin	.002 mg/l	1000	2 ppb
40. Epichlorohydrin	-	-	TT
41. Ethylene dibromide	.00005 mg/l	1,000,000	50 ppt
42. Glyphosate	.7 mg/l	1000	700 ppb
43. Heptachlor	.0004 mg/l	1,000,000	400 ppt
44. Heptachlor epoxide	.0002 mg/l	1,000,000	200 ppt
45. Hexachlorobenzene	.001 mg/l	1000	1 ppb
46. Hexachlorocyclopentadiene	.05 mg/l	1000	50 ppb
47. Lindane	.0002 mg/l	1,000,000	200 ppt
48. Methoxychlor	.04 mg/l	1000	40 ppb
49. Oxamyl [Vydate]	.2 mg/l	1000	200 ppb
50. PCBs [Polychlorinated biphenyls]	.0005 mg/l	1,000,000	500 ppt
51. Pentachlorophenol	.001 mg/l	1000	1 ppb
52. Picloram	.5 mg/l	1000	500 ppb
53. Simazine	.004 mg/l	1000	4 ppb
54. Toxaphene	.003 mg/l	1000	3 ppb
Volatile Organic Contaminants			
55. Benzene	.005 mg/l	1000	5 ppb
56. Carbon tetrachloride	.005 mg/l	1000	5 ppb
57. Chlorobenzene	.1 mg/l	1000	100 ppb
58. o-Dichlorobenzene	.6 mg/l	1000	600 ppb
59. p-Dichlorobenzene	.075 mg/l	1000	75 ppb
60. 1,2-Dichloroethane	.005 mg/l	1000	5 ppb
61. 1,1-Dichloroethylene	.007 mg/l	1000	7 ppb
62. cis-1,2-Dichloroethylene	.07 mg/l	1000	70 ppb
63. trans-1,2-Dichloroethylene	.1 mg/l	1000	100 ppb
64. Dichloromethane	.005 mg/l	1000	5 ppb
65. 1,2-Dichloropropane	.005 mg/l	1000	5 ppb
66. Ethylbenzene	.7 mg/l	1000	700 ppb
67. Styrene	.1 mg/l	1000	100 ppb
68. Tetrachloroethylene	.005 mg/l	1000	5 ppb
69. 1,2,4-Trichlorobenzene	.07 mg/l	1000	70 ppb
70. 1,1,1-Trichloroethane	.2 mg/l	1000	200 ppb
71. 1,1,2-Trichloroethane	.005 mg/l	1000	5 ppb
72. Trichloroethylene	.005 mg/l	1000	5 ppb
73. TTHMs [Total trihalomethanes]	.10 mg/l	1000	100 ppb
74. Toluene	1 mg/l	-	1 ppm
75. Vinyl Chloride	.002 mg/l	1000	2 ppb
76. Xylenes	10 mg/l	-	10 ppm

Specific Testing Requirements

There are some specific requirements for certain types of testing. They are as follows:

1. **For contaminants subject to an MCL, except turbidity and total coliforms:**

- (A) **When compliance with the MCL is determined annually or less frequently:** you must report the highest detected level at any sampling point and the range of detected levels expressed in the same units as the MCL.
- (B) **When compliance with the MCL is determined by calculating a running average of all samples taken at a sampling point:** you must report the highest average of any of the sampling points and the range of all sampling points expressed in the same units as 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:** you must report the average and range of detection expressed in the same units as the MCL.

2. **For turbidity:**

- (A) **When it is reported pursuant to section 141.13 of 40 CFR (National Primary Drinking Water Standards- Maximum contaminant levels for turbidity):** you must report the highest average monthly value.
- (B) **When it is reported pursuant to the requirements of 141.71 of 40 CFR (National Primary Drinking Water Standards- Criteria for avoiding filtration):** you must report the highest monthly value.
- (C) **When it is reported pursuant to 141.73 of 40 CFR (National Primary Drinking Water Standards- Filtration):** you must report the highest single measurement and the lowest monthly percentage of samples meeting the turbidity limits specified in 141.73 for the filtration technology being used.

If you have any questions regarding turbidity testing for your system contact your state primacy agency for specific requirements.

3. **For lead and copper:**

The 90th percentile value of the most recent round of sampling and the percentage of homes exceeding the action level.

4. **For total coliform:**

- (A) The highest monthly number of positive samples for **systems collecting fewer than 40 samples per month.**
- (B) The highest monthly percentage of positive samples for **systems collecting at least 40 samples per month.**

5. **For fecal coliform:**

The total number of positive samples.

6. You have a choice of whether or not to include those constituents that were tested for and not detected. If there were no violations or detects, then there is no requirement to include the table.
7. If a community water system distributes water to its customers from multiple hydraulically independent distribution systems that are fed by different raw water sources, the table should contain a separate column for each service area and the report should identify each separate distribution system. Alternatively, systems could produce separate reports for each service area.

Section 8.

If there was a violation of the SDWA, the regulation **REQUIRES** that the health effects of that constituent be published. Section 8 of the template lists the mandatory health effects language. The regulation **REQUIRES** it *to be included as written! This is not required for detects except for those listed in Section 9.*

(Each constituent is numbered on the test results table. The health effects language is also numbered and corresponds with the test results table.)

For systems which have failed to install adequate filtration or disinfection equipment or processes, or have had a failure of such equipment or processes which constitutes a violation the following language, found in section 8 of the template, is **REQUIRED**:

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.

Section 9.

This section is **required** if your system has **detects of arsenic, nitrates, total trihalomethane, and lead** even if the levels did not exceed the MCL. Additionally if your system has tested and **detected cryptosporidium or radon**, this section is **required** to be part of the report.

(A) Systems which detect arsenic at levels above 25 ppb, but below the MCL, the following language is REQUIRED:

EPA is reviewing the drinking water standard for arsenic because of special concerns that it may not be stringent enough. Arsenic is a naturally occurring mineral known to cause cancer in humans at high concentrations.

(B) Systems which detect nitrates at levels above 5 mg/l, but below the MCL, the following language is REQUIRED:

Nitrate in drinking water at levels above 10ppm is a health risk for infants of less than six months of age. High nitrate levels in drinking water can cause blue baby syndrome. Nitrate levels may rise quickly for short periods of time because of rainfall or agricultural activity. If you are caring for an infant you should ask advice from your health care provider.

(C) Systems which detect lead above the action level in more than 5%, but fewer than 10%, of homes sampled, the following language is REQUIRED:

Infants and young children are typically more vulnerable to lead in drinking water than the general population. It is possible that lead levels at your home may be higher than at other homes in the community as a result of materials used in your home's plumbing. If you are concerned about elevated lead levels in your home's water, you may wish to have your water tested and flush your tap for 30 seconds to 2 minutes before using tap water. Additional information is available from the Safe Drinking Water Hotline (1-800-426-4791).

(D) Systems which have performed any monitoring for Cryptosporidium and detected it in either the finished water or the source water must indicate that Cryptosporidium may be present in the source water or the finished water and include the summary of the result and an explanation of the significance. Below is a sample explanation. Your primacy agency may require a more detailed explanation.

We constantly monitor the water supply for various constituents. We have detected cryptosporidium in the _____(finished water or source water). We detected this constituent in _____ out of _____ samples tested. We believe it is important for you to know that cryptosporidium may cause serious illness in immuno-compromised persons such as persons with cancer undergoing chemotherapy, persons who have undergone organ transplants, people with HIV/AIDS or other immune system disorders. These people should seek advice from their health care providers.

(E) Systems which have performed any monitoring for radon which indicates that radon may be present in the finished water, must include the results of the monitoring and an explanation of the significance of the result. There is no *specific* language required but below is a sample explanation.

We constantly monitor the water supply for various constituents. We have detected radon in the finished water supply in _____ out of _____ samples tested. There is no federal regulation for radon levels in drinking water. Exposure to air transmitted radon over a long period of time may cause adverse health effects.

(F) Systems that detect TTHMs above 0.080 mg/l, but below the MCL in Section 141.12, as an annual average, monitored and calculated under Section 141.30, must include health effects language prescribed as below:

Some people who drink water containing trihalomethanes in excess of the MCL over many years experience problems with their liver, kidneys, or central nervous systems, and may have increased risk of getting cancer.

Section 10.

This section explains the test results table. If you had a violation, you are **required** to include an explanation of the violation, including its duration, potential adverse health effects and actions taken to address the violation. Select the appropriate language that fits your test results.

If you had monitoring or reporting violation see the example below:

We constantly monitor for various constituents in the water supply to meet all regulatory requirements. This past year we (describe the violation and its length of time). This does not pose a threat to the quality of our water supply.

Section 11.

This language is required and must be used in its entirety!

Section 12.

This language is optional, but does help to explain how it takes a lot of water consumed over a very long period of time *before there is even a one-in-a-million chance of risk.*

Section 13.

This section provides tempered language for the most common detects and violations of Total Coliform, Nitrates and Lead and some suggestions as to the efforts that you are undertaking to correct the problem(s). It is recommended that this tempered language be included if your system has detects of these constituents.

Section 14.

The regulation **requires** that in systems with significant numbers of non-English speaking customers and where it is required by the State Primacy Agency, the report contain information in the appropriate language regarding the importance of the report or contain a telephone number or address where such residents may contact the system to obtain a translated copy of the report or assistance in the appropriate language. The State Primacy Agency determines the inclusion of this provision.

Section 15.

This section offers the opportunity for you to inform your customers about the system and such things as plans for the future or rate increases. Provided are examples of items you may want to consider in this section. It is not a requirement of the report.

Section 16.

This is required language and must be included as written.

Section 17.

This section ends the report. You are encouraged to end the report on a positive note.

Be sure to proof your report to insure that all unnecessary language and section headings have been deleted.