Writing Your Consumer Confidence Report
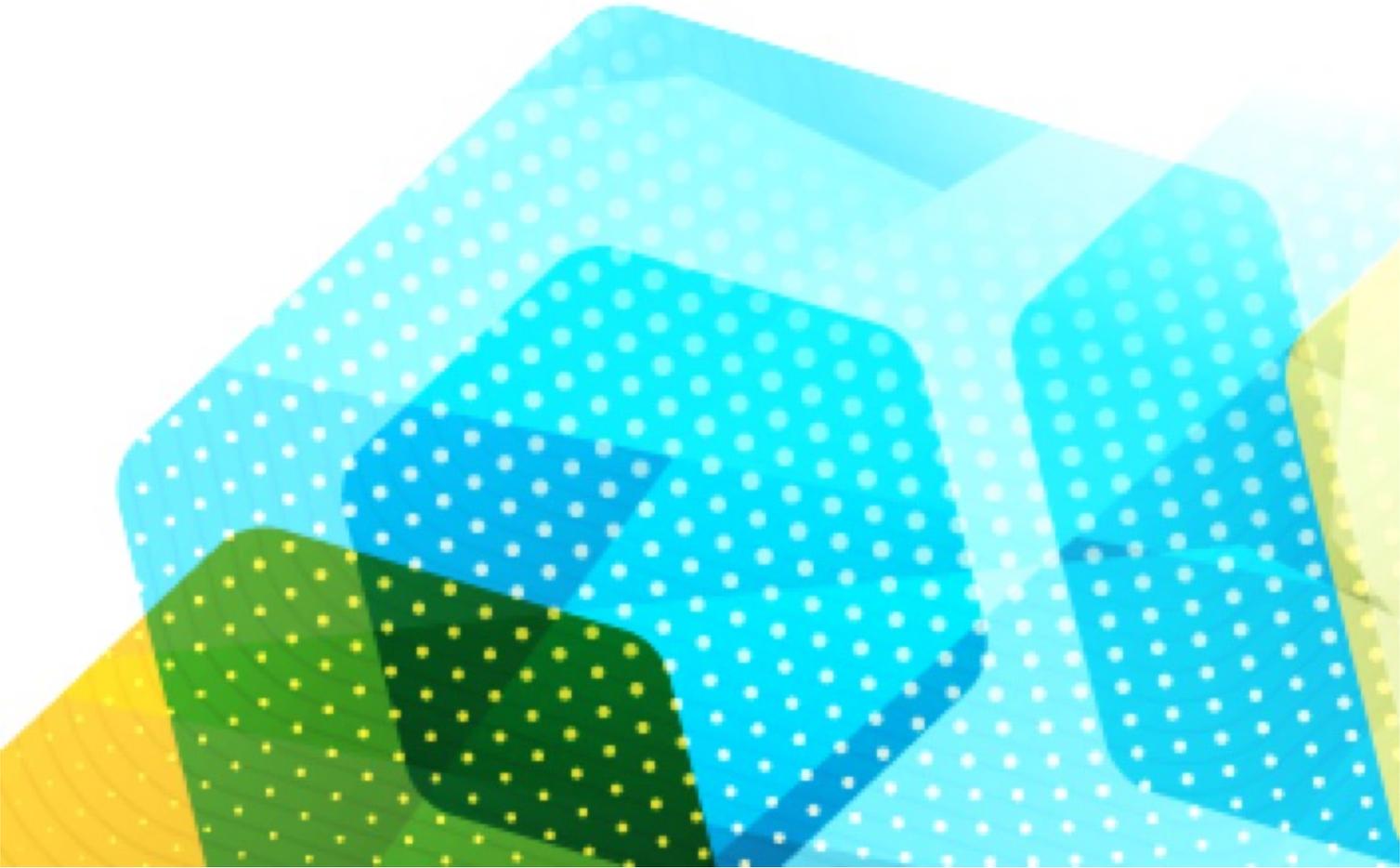
How to Create a Perfect CCR

Gemini Group

Contents

1. Answers & Resources

For 20 years, we have produced and distributed more than 70 million water quality reports (Consumer Confidence Reports) for water systems across the nation. In that time, we've worked with hundreds of honest, intelligent and conscientious people who unknowingly put themselves in difficult positions when interpreting the often-complex rules governing the Consumer Confidence Report requirement. The following information is designed to help you address some of the more complex components of the requirement and provide you with some valuable resources that will help you produce a great report. Whether you are creating your own report or using our report development services, we're confident you will find the following information helpful and informative.

2. Correct URL Presentation for e-Delivery Compliance

The new CCR electronic delivery option was certainly one of the better rules that have come down from the EPA in recent memory and many water systems throughout the country have successfully taken advantage of this cost-saving rule. As with anything new, water systems were challenged in 2013 with interpreting the delivery requirement changes. However, with a little bit of preplanning and close consultation with state CCR contacts, most systems enjoyed a trouble-free experience (not to mention a MUCH cheaper experience as well!).

As a relatively new CCR delivery option, the electronic delivery method has raised many questions and for some, confusion. However, the single most troubling aspect of the electronic delivery method appears to be how to correctly tell customers where to find their CCR on the Internet.

In short: **You must tell your customers EXACTLY where the CCR file is stored on your city's or town's website.**

Simply placing this text on your water bills (or some other notification medium) is not sufficient: *Come to our website at www.YourWaterDepartment.org to find the 2016 Water Quality Report.*

The correct way is to provide the URL address that will allow for a download of the report when the link is clicked or typed into a Web browser. For example, a client who uses our Web Hosting service will see their report titled, *2016 CCR.pdf* in a folder called, Reports. So, the message to their customers would look something like this: *You can download a copy of our 2016 Water Quality Report by clicking www.gemgrp.com/Reports/Tul/2016CCR.pdf*

As long as the 2016CCR.pdf file stays in our client's Reports folder then anyone from anywhere at anytime can directly download the report. (We store all Web Hosting clients' reports indefinitely). You should plan to do the same thing.

The last thing I'll mention here is to make sure you consult with your state's CCR contact person to make sure your e-delivery plan will meet their requirements; some states are more forgiving in the interpretation of the new rule while others follow a more stringent path.

3. URL Shortener: It's Free. And, It's Forever.

If you're one of the many people who decided to take advantage of the CCR electronic delivery option then you may have come across an issue with using very long URLs to link your online reports. Many water systems that use automated billing services/software, for example, are not offered much room on the printed water bill to add personalized text so a typical URL might not fit in the allotted space.

One solution is the free Google URL Shortener application (goo.gl). You simply enter the entire URL you want to shorten and Google's website immediately creates a shortened version of it. We use it all the time for clients who are part of our CCR Hosting Service.

For example, the link to one of our hosting client's electronic report is displayed in traditional fashion as http://www.gemgrp.com/eReports/CNVT000047Y15.pdf; but, using Google URL Shortener, it has been reduced down to goo.gl/wqJR3s. Both URLs will download the client's report but it's easy to see that the shortened version will fit far more easily onto any water bill.

And remember: you're required to keep your online reports available to the public for several years, so using this free service will allow you to publish and keep active the URL link well beyond the required timeline.

4. Which Contaminants to Report in Your CCR

Even after 20 years of creating CCRs, which contaminants need to be reported still perplexes even the most seasoned report developer. Contaminant monitoring regulations seem to always be in flux so it's understandable that there still exists some confusion as to what to report and how to report it.

In short, Primary Regulated contaminants (IOCs, RADs, VOCs, SOCs and DBPs) must be reported if they were detected. (Note that California water systems must report **all** Secondary contaminants that were **detected**).

How to report the correct values of the detected contaminants can get complicated especially when dealing with contaminants like TTHMs and HAAs where locational running annual averages (LRAAs) are now required to be reported in the CCRs. The easiest way for you to figure out how to report your contaminant data is to refer to the examples that can be accessed by clicking the link at the bottom of any of the contaminant screens in the Detected Contaminant section of the *CCReporter* application. The examples are great and should be all you need to figure out what values to report.

If you are on a reduced monitoring schedule for any detected contaminant, you might need to include that contaminant's data from previous reports. Remember to go back 5 years for that information (9 years for California systems). Most of the violations meted out to water systems by the state reviewers are for not including this information in their reports.

The simplest and most accurate way to see if you need to include older data is to open last year's report, identify the contaminants on reduced monitoring, determine if sampling occurred and, if not, simply copy over that information into this year's report. Of course, if a contaminant was sampled in that year and it came back as a non-detect, then you don't include that contaminant in the report.

5. Describing a Violation in Your CCR

If you received a violation during the reporting year, you're required to provide a summary statement of the violation in your CCR. Violation statements should be short (single paragraph usually suffices for each violation), to the point, and contain the following information:

1. What type of violation (e.g., MCL violation, AL exceedance, reporting and monitoring violation, etc.)?
2. When did the violation occur (i.e. begin date)?
3. How long were you in violation?
4. What action did you take to resolve it?
5. What was the cause (only if you know for sure; otherwise, ignore this)?
6. What's being done to prevent a reoccurrence of the violation?
7. Health effects statement*

*Our CCReporter application will automatically insert any required health-effects statements where applicable so you don't have to worry about adding that information. (Note that not all violations require health-effects statements.)

Primary Contaminant violation descriptions should never appear tucked away as a footnote to the data tables. Although the rule doesn't specifically state that you can't do this, state CCR reviewers often frown on any obvious attempts at hiding violation information.

Include Public Notification Rule (PNR) notices in your CCR!!

If you received a violation for the current year and you want to use the CCR to comply with the PNR requirements, you can certainly include the notice in your report. Not only is this a valid and acceptable method for complying with the PNR requirements, it's also a great cost-saver since you won't have to worry about the additional costs of a separate mailer. (Tier II and Tier III PNR notices can be managed effectively for this purpose but Tier I notices should be handled separately from your CCR due to the 24-hour notification requirement.) The PNR has its own reporting requirements and its own reporting format so make sure you include all the required information in your CCR. (Most states provide templates that can be downloaded and edited to fit your specific situation.)

6. Reporting Data in the Correct Units of Measure

A very common source of confusion with the CCR rule is the "CCR Units" requirement. Reporting detected contaminant data in the correct unit of measure is part of the rule requirements and, if done incorrectly, can result in a reporting violation. Each regulated contaminant has a specific unit of measure that it must be reported in; in short the CCR Units requirement states that all MCLs/SMCLs/MRDLs/ALs must be reported as a whole number above 1. The theory is that data is easier to comprehend when it's represented in whole numbers.

If you're a client using our CCReporter application, just enter in all of your data in the units of measure provided to you by your lab and the CCReporter application will make all the necessary unit-of-measure conversions for you. If you choose to make these conversions yourself, check with your state's CCR guidance document to verify that all your data conversions meet your state's reporting requirements.

A great example of CCR Units confusion is with lead and copper. (Many people misreport the lead and/or copper data mainly because they wish to show them both in the same unit of measure.) Lead's Action Level (AL) is 0.015 ppm so to be in compliance with the rule, we have to convert the unit of measure until it's over 1; in this example we need only go up one level in our conversion to 15 ppb by moving the decimal point 3 places to the right. **You should never report lead in ppm unit of measure.**

Copper's AL is 1.3 ppm, which is already above 1 so no conversion of copper is required. If you wish to report lead and copper in the same unit of measure, convert copper's AL/MCLG to 1,300 ppb - as well as the data you're reporting - so both lead and copper will be reported in ppb units.

Again, your best and safest option is to just enter the lab data as provided to you and let CCReporter decide what the required units of measure need to be for compliance with your state regulations. If you still want to manually convert your data, remember to report your data and the associated MCL/MCLG/SMCL/MRDL/MRDLG/AL in the same units of measure.

7. Source Water Assessment: What Information Must be Included in the CCR?

If a Source Water Assessment has been conducted for your water system, you're required to include a summary statement listing the known sources of vulnerability to your water source(s). In some cases, a summary statement containing this information will be part of your assessment so you can simply copy that over to your report.

Some states (i.e. New Jersey) require a specific format for presenting the findings of your Source Water Assessment in your CCR. Most states, however, simply require a summary statement and information on where your customers can get a copy of the completed assessment.

NOTE: Your summary statement is required to be included each year in your CCR. Also, remember to include any new information in your summary statement if your Source Water Assessment has been updated.

So, in short, remember to include:
1. A short summary statement listing any known sources of vulnerability to your water source(s).
2. Information on where your customers can get a copy of your water system's Source Water Assessment (they should already be posted on your state's website so you can simply provide that URL link directly to your assessment in your report).

If you're unsure about whether an assessment was completed for your system, or if you're not sure how to interpret the assessment findings, get in touch with your state CCR contact person for guidance and recommendations.

8. Reporting Non-Detects in Your CCR

Anything reported from the lab in the amount detected column like 0, <0.003, BDL, ND, etc. are all defined as non-detects and should not appear in the detected contaminant tables in your report. The states of Alabama and New York require the listing of all non-detects in the reports; it's optional to report them in all other states. For those systems required to report them, we recommend simply listing them out in paragraph format instead of a data table format. Unless you're using our larger reporting brochure-style templates, you'd soon run out of space listing all non-detects in a table format.

Report only detected contaminants in the detected contaminants data tables - do not report non-detects there. No state has ever issued a violation that I know of for reporting non-detects in the tables of detected contaminants, however, do think twice before combining those data into the same table.

It's understandable that you would want to report non-detects as that information provides great public relations value: it's just as important to know what's not in your water as it is to know what's in it (who would object to learning that E. coli isn't in the drinking water!). So, you certainly can include non-detects in your report, just not in the table where you're listing the detected contaminants.

9. Reporting LRAA Data

Now that most water systems are only reporting their Stage 2 D/DBP data in their annual CCRs, it's worth revisiting the reporting requirements.

As you well know, we're now required to report the highest locational running annual average (as defined by IDSE) and not the systemic running annual averages.

If more than one location has exceeded the MCL, then you're required to report those locations as separate entries in the report's data table section. (Note: some states require that you identify those locations in a specific way in the data table so check with your state's CCR contact person to make sure you're providing the required level of detail.)

For the Range column in the data table, remember to only look at the low and high sample values from the reporting calendar year. For example, for this year's report, while you'll be using data from 2015 to calculate the LRAAs for 2016, you only use the sample data from 2016 to present the low and high range sample values.

You've probably already seen examples of how to correctly show your LRAA data in your CCR but here's a link in case you want to see a more simplified, generic example.

10. Unregulated Contaminant Monitoring Rule

The 1996 Safe Drinking Water Act (SDWA) amendments require that once every five years EPA issue a new list of no more than 30 unregulated contaminants to be monitored by public water systems (PWSs) known as the Unregulated Contaminant Monitoring Rule (UCMR).

If you are required to monitor unregulated contaminants under UCMR, you are also required to include that information in your CCR.

To get more information and to see whether or not you are required to monitor, check out EPA's page:

Unregulated Contaminant Monitoring Rule

11. Revised Total Coliform Rule

As with any rule transition, the changeover from TCR to RTCR has been a bit bumpy. And, the RTCR's CCR (or AWQR for New York systems) reporting requirements is proving to be no less challenging. If you're a client of Gemini Group then you need not read any further as the CCReporter application will guide you through this confusing labyrinth; all others need to pay particular attention to the type of event that may – or may not have – triggered a TT violation as there is specific language that needs to be included in your report.

If a RTCR trigger event required a Level 1 and/or Level 2 assessments you'll need to include in your report information describing the event using specific state-required language (including easily overlooked single-sentence statements if the trigger event meets certain conditions).

Some states require water systems sampling under the RTCR to include all positive total coliform results in their report – as was done under the old TCR – while other states do not require reporting any coliform positive results unless there was a TT violation; you would then simply enter "Positive" in the Amount Detected column of the data table instead of TC+ count. Check with your state's drinking water office to confirm your reporting requirements. (If you're required to report total coliform positive RTCR results, remember to change the MCL in your data table to TT.)

A change in reporting E. coli detects in the CCR is also part of the new RTCR. Detects of E. coli still have to be included in your report as the total number of positive samples for the year. Additionally, state-required language will need to be included that's specific to the type of trigger event so pay particular attention to these requirements as they could be easily overlooked.

12. EPA's Online CCR Tool

Several years ago, the EPA created a tool called *iWriter* that can help you create your CCR. This online tool is easy to use and it's free! However, if you choose to use this tool please note that it may not meet the specific rule requirements that have been established by your state. Most states have made changes to the federal CCR rule so make sure to check with your state if you plan to use it.

Unlike EPA's *iWriter* program, our online report writer, called *CCReporter*, produces compliant, state-specific CCRs based on each states' unique requirements. Unfortunately, it's only available for our client's use at this time. But despite its obvious limitations, EPA's *iWriter* is a good place to start if you have limited options.

Click here to go to the EPA's report tool.

13. Pictures and Educational Articles

There is one facet of the CCR rule that is often missed or even ignored. The CCR rule contains an important provision that requires all water systems to provide additional educational information in their reports every year. However, what is considered educational information is mostly left to interpretation. Despite this, there are many resources on the Internet that can help you come up with some great ideas for information to include in your CCR.

When we develop educational articles for our clients' use, we examine all current issues affecting water consumers and choose only those that have the most impact. That way, their customers will be more inclined to read their report as opposed to just throwing them away.

Here are a few great sites that offer free information:

Environmental Protection Agency
American Water Works Association
Public Library of Science
FreeFullPDF.com

Pictures can make an otherwise intimidating report appear more interesting. Below, is a list of websites that offer free or low cost images that you can use in your reports:

Pixabay
Fotolia
Flickr
Creative Commons

14. Keep it Simple

No one was born a great writer. But, to be a great writer takes a lot of training and practice. Thankfully, you don't have to be a great writer to write a great CCR. Forget about big words and long sentences – you don't need them. In fact, uncommon words and complicated sentences can often confuse and frustrate readers.

In short, you should write your CCR so that a typical 6th or 7th grade student could easily understand it. A general rule of thumb suggests you use 'smaller' words and shorter sentences. It sounds easy but it can be quite challenging to actually do.

One of the most popular readability tests is known as the Flesch-Kincaid Readability Test and was designed to rate the reading ease and grade level of documents. It's based on a scoring system from 0 - 100. The higher the score the easier it is to read and understand. So, before you send out your next report, try using these resources to help you create a great CCR.

https://www.online-utility.org/english/readability_test_and_improve.jsp

https://datayze.com/readability-analyzer.php

By the way, this page scored a 69.24 on the Flesch-Kincaid Readability Test with a grade-level rating of 7th grade – not too bad!