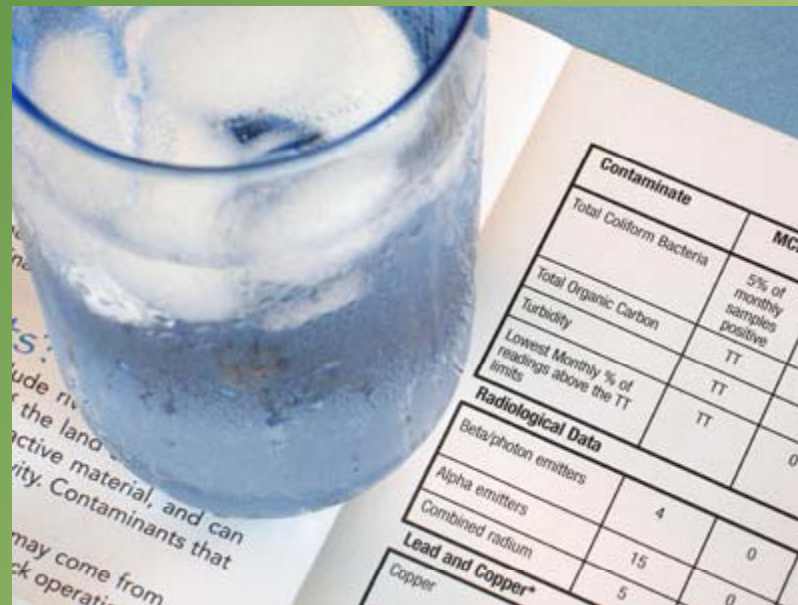


Recent Regulatory Changes to the CCR & Proposed Changes to the L /C Rules



Laura A. Taylor
Surface Water Meeting
October 26, 2016

Consumer Confidence Report (CCR) Rule

- Important Dates
- Required Elements
- Common Mistakes
- CCR Delivery
- Electronic Delivery
- Enforcement

Important Dates

- Required of all Community Water Systems.
- Must be done Annually.
- Must be provided to customers and to ADEM.
- Include information about water system:
 - Sources
 - Violations
- Important dates:
 - **April 1 - Deliver information to the systems buyer water.**
 - July 1 – Deliver CCR to customers and ADEM; deliver Certification Form to ADEM.

Required Elements

- **The following elements must be included:**
 - **Water System Information**
 - Contact Person
 - Time and Place of Board Meetings
 - **Sources of Water**
 - Common names and general location
 - Treatment Provided
 - Source Water Assessment Information

Common Mistakes

- Using the incorrect year. Calendar year 2017 should be reported as:
 - 2016 Consumer Confidence Report
 - 2016 Water Quality Report
- Not listing board meeting times and place
- Not including table of all contaminants
- Not including source water information, especially in purchase systems
- Small systems not notifying customers of publication date in newspaper
- No contact information
- Using incorrect units

CCR Delivery

- System serving a population less than 500:
 - Mail the CCR to each customer, or
 - Provide a written notice to each customer that the CCR is available upon request.
 - Must display the CCR in a prominent place easily accessible to each customers.
 - Or post the CCR on publically accessible site on the internet and meet all the requirements.
 - Paragraph 10 Chapter 14

CCR Delivery

- System serving a population at least 500 but less than 10,000 population:
 - Mail the CCR to each customer, or
 - Publish it in one or more local newspapers, or
 - Provided that each customer are informed in writing that the CCR will not be mailed.
 - Inform the customers of the date of the publishing of the CCR.
 - CCR must be published in a full size readable by the average consumer.
 - Post the CCR on publically accessible site on the internet and meet all the requirements.
 - Paragraph 10 Chapter 14

CCR Delivery

- System serving a population at least 10,000 but less than 100,000 population:
 - Mail the CCR to each customer, and
 - Make a good faith effort to reach customers who do not receive a bill.
 - Or post the CCR on a publicly accessible site on the internet and meet all the requirements.
 - Paragraph 10 Chapter 14

CCR Delivery

- System serving a population at least 100,000 customers:
 - Mail the CCR to each customer, and
 - Post the CCR on the water system's website, and
 - Make a good faith effort to reach customers who do not receive a bill.
 - Or post the CCR on publically accessible site on the internet and meet all the requirements.
 - Paragraph 10 Chapter 14

Alternate Delivery Method

- A water system may post its CCR on a publically accessible site on the internet, if
 - Provided a direct link to the CCR.
 - Provided customers an option to receive a paper copy.
 - The option must be made on each bill sent to the customer.
 - System must assess the customer's preferred delivery method each year prior to certifying the delivery to ADEM.

Alternate Delivery Method

- The water system shall still make a good faith effort to provide a paper copy of the CCR to customers who do not receive a bill or are known not to have access to the internet and/or electronic delivery of the CCR.
- The direct link must be displayed on each bill and the typeface used must be the same as the largest typeface on the bill.
- The direct link must be displayed on all correspondence or notifications sent to the customer.

Alternate Delivery Method

- A short message to encourage the customer to read the CCR must be included above or near the direct link if the CCR includes a violation.
- The water system shall send an email with a CCR related subject line to inform customers of the availability of the CCR each year. A copy of the email shall be sent to the Department.

Email Delivery Method

A water system may send an electronic copy of their CCR to their customers via email instead of mail as long as the email list is kept up to date. If a water system sends the CCR via email and it receives a message that the email failed to reach the customer, the water system shall provide a paper copy of the CCR via mail to that customer.

CCR Delivery Methods Not Allowed

- Customers must not have to navigate to another webpage.
- Twitter or Facebook do not meet the “direct deliver” requirements.
- Automated phone calls (such as 911 types) do not meet “directly deliver” requirement.

Do & Don't CCR Delivery

Do!

Electronically meet your recordkeeping requirement and keep the CCR URL posted on the Internet for at least three (3) years.

Don't!

The URL cannot lead to a webpage with multiple CCR's (e.g., multiple years and/or different system's CCR's).

Delivery to ADEM

- Use E-DWR Electronic Format
- Certified Mail (addressed to Laura Taylor)
- Fax to 334/271-7820
- Email to Laura at lat@adem.state.al.us

Delivery to ADEM

- Any questions concerning the delivery to ADEM, please contact Laura Taylor.
- Any questions concerning the delivery to your customers, please contact Laura Taylor.

Congratulations

Congratulations on 100 % of the Consumer Confidence Reports being received for six years in a row.

All Reports and Certification forms was received by the close of business on June 30.

Lead and Copper Rule

- Source Water Monitoring and Treatment (335-7-11.15)
- Monitoring requirements for sources has changed slightly when an exceedance has occurred.
- Monitoring must be completed within 180 days after the date of the initial exceedance.

Questions

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