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

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Surface Water Meeting
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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 contaminates
• 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 least 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 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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