

## Consumer Confidence Report (CCR) Basics

Krista Robinson  
DEQ, Drinking Water and Municipal Assistance Division  
[robinsonk24@michigan.gov](mailto:robinsonk24@michigan.gov) | 517-599-8655

### Purpose of the CCR Rule

- Helps protect public health!

### CCR

- This rule applies to consecutive systems too!
- “CCR Units” is a real thing!
- Sodium must be included no matter what!
- Includes data going back 5 years!
- Supplies are asking more questions (and earlier) this year!

### There is no set template

- [www.michigan.gov/drinkingwater](http://www.michigan.gov/drinkingwater)
  - Click “Community Water Supply Homepage”
  - Click “Reporting Forms”

### CCR Regulations

- Federal Rule:
  - Mandated by SDWA 1996 updates
  - Community Water Supplies only
  - Eight content requirements
- Michigan Rule:
  - Public Act 56 of 1998
  - Two Michigan-only requirements:
    1. Sodium required on report, even if ND
    2. Extra language for 6 contaminants

### 8 Federal Content Requirements

#### Reporting Levels of Detected Contaminants

- Detected contaminant = *any regulated or unregulated* (e.g., UCMR) contaminant detected at or above its method detection limit
- The “detects table” is the **main table** in the CCR that shows the:
  - **highest compliance level** of each detect contaminant
  - **range of levels** found during the CCR’s calendar year

#### Reporting Levels of Detected Contaminants

#### Content Requirements

- Entry point chems:

#### What about stand-by wells?? - Content Requirements

##### -Bacteriological:

- The Revised Total Coliform Rule (RTCR) brings required language!
- If-then scenarios for:
  1. Level 1 or Level 2 assessments not due to E. coli
  2. Level 2 assessment due to E. coli
  3. E. coli MCL violation

## -Lead and copper

- This “Information About Lead” paragraph is **required for ALL** CCRs (even if lead was ND!):

**Information about lead:** If present, elevated levels of lead can cause serious health problems, especially for pregnant women and young children. Lead in drinking water is primarily from materials and components associated with service lines and home plumbing. [NAME OF UTILITY] is responsible for providing high quality drinking water, but cannot control the variety of materials used in plumbing components. When your water has been sitting for several hours, you can minimize the potential for lead exposure by flushing your tap for 30 seconds to 2 minutes before using water for drinking or cooking. If you are concerned about lead in your water, you may wish to have your water tested. Information on lead in drinking water, testing methods, and steps you can take to minimize exposure is available from the Safe Drinking Water Hotline or at <http://www.epa.gov/safewater/lead>.

- Must include the most recent 90<sup>th</sup> percentile
- Number of detects above the action level (AL)

## -Total organic carbon (TOC):

- Scenario 1
  - Alternative Compliance Criteria met (low TOC in system without enhanced coagulation)
- Scenario 2
  - TOC % removal was achieved
- Scenario 3
  - TOC % removal was not achieved = TT Violation!

## -Turbidity:

- Most common → systems that filter must list the highest single measurement & the lowest monthly %
- Example for conventional or direct filtration:

## -Long Term 2 Enhanced Surface Water Treatment Rule (LT2):

- Must include detects!
- If detects in source or treated water:
  1. A summary of the monitoring results
  2. An explanation of the significance of the results

**What if a violation occurred?****Distribution**

- Mail or *directly deliver* a copy by **July 1**
  - Wholesalers’ data due to consecutives by **April 1**
- Includes a good faith effort
- Can be done by mail or email
- Must be made available upon request

*If a community has a population of >10% non-English speaking residents, the report shall contain the information in the appropriate languages*

**Direct Delivery**

- Methods deemed “direct delivery” by the EPA:
  - Mail – paper copy
  - Mail – notification that CCR is available on a website with the URL
  - Email – URL included
  - Email – CCR sent as attachment
  - Email – CCR embedded in the message

**URL must be a direct link!**

- Good example:  
[www.winterfell.com/waterqualityreport](http://www.winterfell.com/waterqualityreport)
- Bad example:  
[www.kingslanding.com/sites/files/2017\\_klwqr\\_final\\_&%cor/\\_revisions%/0,1607,7-135-3313\\_367-,00.html](http://www.kingslanding.com/sites/files/2017_klwqr_final_&%cor/_revisions%/0,1607,7-135-3313_367-,00.html)

**Delivery Waivers**

- Supplies <500 people can post in public places
  - Supplies <10,000 people can publish CCR in newspaper
- Both options require supplies to:
1. Tell customers report will not be mailed
  2. Make the report available upon request

**CCR Certificate of Distribution**

- Due by October 1  
[www.michigan.gov/drinkingwater](http://www.michigan.gov/drinkingwater)  
→ Click “Community Water Supply Homepage”  
→ Click “Reporting Forms”

**CCR as a Vehicle...**

- ...to distribute Tier 3 Public Notice

**Potential CCR Violations**

- Failure to distribute by July 1<sup>st</sup>
- Wholesaler failing to meet April 1<sup>st</sup> deadline
- Not directly delivering CCR
- Not including the required 8 components
- Not using the correct data or units
- Missing required language

**FAQs**

1. Does the DEQ send out reminder letters?
2. Is it ever too early to start working on my CCR?
3. How do I submit a draft of a final copy to the DEQ?

**Reporting to DEQ****Need some help?**

- EPA’s CCR iWriter  
[www.epa.gov/ccr](http://www.epa.gov/ccr)
- Click on “How to comply with CCR requirements”
- Click on “CCRiWriter”

**CCR Summary**

- Improve public confidence & provide information
- Advance public’s understanding of drinking water processes
- Opportunity for supply to increase managerial capacity
- Increase public awareness of the need to protect water

**District Emailboxes**

1. DEQ-DWMA-Lansing@michigan.gov
2. DEQ-DWMA-Saginaw-Bay@michigan.gov
3. DEQ-DWMA-Jackson@michigan.gov
4. DEQ-DWMA-SEMI@michigan.gov
5. DEQ-DWMA-Kalamazoo@michigan.gov
6. DEQ-DWMA-Grand-Rapids@michigan.gov
7. DEQ-DWMA-Cadillac@michigan.gov
8. DEQ-DWMA-UP@michigan.gov