

CONSUMER CONFIDENCE REPORTS DELIVERY OPTIONS

ILLINOIS RURAL WATER ASSN.

42TH. ANNUAL TECHNICAL
CONFERENCE

FEBRUARY 20, 2014



HISTORY OF CONSUMER CONFIDENCE REPORT (CCR)

- DEVELOPED AS A PART OF THE USEPA SAFE DRINKING WATER ACT OF 1996
- FINAL RULE ON SEPTEMBER 18, 1998
- ONLY AFFECTS CWS AND NOT NTNC
- FIRST CCR DEADLINE TO ISSUE WAS OCTOBER 19, 1999 (USING 1998 DATA)
- SECOND AND ALL SUBSEQUENT REPORTS DUE NO LATER THAN JULY 1 EACH YEAR

HISTORY OF CCR

- FIRST YEAR ALL CCRS HAD TO BE DIRECT-MAILED OR HAND-DELIVERED
- SUBSEQUENT YEARS OFFERED THE FOLLOWING OPTIONS:
 - DIRECT MAIL OR HAND DELIVERY
(REQUIRED IF MCL VIOLATION EXISTED)
 - PUBLICATION OF REPORT IN PAPERS, NEWSLETTERS, ETC.
 - ONLY FOR CWS UNDER 10,000 POPULATION



METHOD OF DELIVERY CWS SERVING UNDER 500

- SYSTEMS MUST HAVE NO MCL VIOLATIONS OR MONITORING VIOLATIONS
- POST NOTICE OF AVAILABILITY OF REPORT
- HANGING CCR IS NOT A SUBSTITUTE FOR POSTING NOTICE OF AVAILABILITY
- LET CUSTOMERS KNOW IN NOTICE WHAT CCR IS AND HOW TO GET A COPY OF THE REPORT



METHOD OF DELIVERY FOR CWS SERVING OVER 500

- SYSTEMS MUST HAVE NO MCL VIOLATIONS OR MONITORING VIOLATIONS
- DIRECT-MAIL TO ALL WATER CUSTOMERS, OR
- HAND-DELIVERY TO ALL WATER CUSTOMERS, OR
- PLACED IN PUBLICATION(S) SERVING THE SERVICE AREA OF CWS, OR
- ELECTRONIC DELIVERY OF REPORT, AND
- GOOD FAITH EFFORTS



FIFTEEN YEARS LATER

- COMMENT I HEARD USEPA OFFICIAL MAKE AT A MEETING SEVEN YEARS AGO:

“THE CCR IS THE BEST THING THAT EVER CAME OUT OF WASHINGTON, D.C.”



FIFTEEN YEARS LATER

- **UPSIDE:**
- **HAS PROVIDED CUSTOMERS OF CWS INFORMATION ABOUT THE QUALITY OF THEIR DRINKING WATER**
- **PROVIDES DATA ON THE DOZENS OF CONTAMINENTS THAT ARE ANALYZED**
- **PROVIDES TRANSPARENCY**



FIFTEEN YEARS LATER

- DOWNSIDE:
- MILLIONS OF TREES KILLED TO MAKE THE PAPER FOR THE REPORTS
- THE SINKING FEELING THAT DARN FEW PEOPLE ACTUALLY LOOK AT THEIR REPORT
- MAY BE BORNE OUT BY # OF QUESTIONS WE RECEIVE
- HOWEVER, CCRs ARE VERY BIG READING IN PRISONS



ELECTRONIC DELIVERY OF CCR MAIN (PRIMARY) DELIVERY METHOD

- OPTION PASSED BY CONGRESS IN JAN, 2013
- FIRST AFFECTED CCR'S ISSUED IN 2013
- PROVIDES COST SAVINGS THAT INCLUDE:
 - PRINTING COSTS OF PAPER CCR
 - POSTAGE COSTS (DIRECT-MAIL)
 - PUBLISHING COSTS (PAPERS, FLIERS)

OPTION AVAILABLE IF A LIST OF
REQUIRMENTS ARE MET BY CWS.



ELECTRONIC DELIVERY OF CCR MAIN (PRIMARY) DELIVERY METHOD

- CWS SERVES ANY POPULATION
- WEBSITE USED FOR e-CCR MUST TAKE CUSTOMERS **DIRECTLY** TO THE CCR WITH NO FURTHER NAVIGATION NEEDED
- WEBSITE ADDRESS MUST BE UNDER 40 CHARACTERS
- WEBSITE CCR CONTENT MUST BE EXACTLY THE SAME CONTENT (WORD FOR WORD) AS HARD COPIES MAILED, POSTED, OR PRINTED IN PUBLICATIONS



ELECTRONIC DELIVERY OF CCR MAIN (PRIMARY) DELIVERY METHOD

- WEBSITE CCR MUST BE SAME (WORD FOR WORD) AS THE FINAL COPY SENT TO IEPA
- CCR IN **PDF** OR **HTML** FORMAT
- THE e-CCR MUST REMAIN ON THE WEBSITE FOR AT LEAST THREE MONTHS
- LENGTH e-CCR IS ON WEBSITE CAN EXCEED THREE MONTHS
- ORIGINAL CONTENT AND FORMAT CAN NOT CHANGE DURING PERIOD



ELECTRONIC DELIVERY OF CCR MAIN (PRIMARY) DELIVERY METHOD

- e-CCR MUST CONTAIN ALL REQUIRED LANGUAGE, DATA, DEFINITIONS, AND VIOLATIONS, PER THE REGULATION
- PHONE # AND CONTACT PERSON MUST BE LISTED SO CUSTOMERS MAY CALL WITH QUESTIONS OR COMMENTS
- NOTIFICATION OF THE e-CCR WEBSITE ON:
- BILLINGS (STICKERS), SEPARATE POSTCARD, 1/4 NEWSLETTER, ETC.



LANGUAGE USED ON BILL OR INSERT

- “Your Annual Water Quality Report is now available at http://www._____/pdf (or html) This report contains important information about the source and quality of your drinking water. To speak with someone about this report or to have a copy of it mailed to your, please call (555)555-5555.”



NOTICE FOR E-PAY OR AUTO-PAY CUSTOMERS

- AN EMAIL WITH **“IMPORTANT INFORMATION ABOUT YOUR DRINKING WATER QUALITY”** IN THE SUBJECT LINE MUST BE SENT TO E-PAY OR AUTO-PAY CUSTOMERS
- BODY OF THE EMAIL WILL INCLUDE THE WEBSITE ADDRESS
- BODY OF EMAIL MUST ALSO INCLUDE LANGUAGE INCLUDED IN THE NEXT SLIDE



E-PAY OR AUTO PAY NOTICE LANGUAGE

- Please go to http://www._____.pdf (or html) to view your 2013 Annual Water Quality Report to learn about your drinking water. This report contains important information about the source and quality of your drinking water. To speak with someone about this report or to have a copy of it mailed to you, please call (555)555-5555.



E-PAY OR AUTO-PAY NOTICE OF AVAILABILITY

- **IMPORTANT:**
- **A HARD-COPY OF THE CCR MUST BE MAILED DIRECTLY TO ANY EMAIL ADDRESS THAT COMES BACK AS “UNDELIVERABLE”**
- **KEEP A RECORD OF THIS INFORMATION FOR SUBMISSION TO THE AGENCY, IF REQUESTED DURING SANITARY SURVEY**



TIER 3 PUBLIC NOTICES IN e-CCR

- THE e-CCR MAY ALSO BE USED FOR THE DISTRIBUTION OF TIER 3 PUBLIC NOTICES IF:
- THE CORRECT LANGUAGE IS USED
- THE PUBLIC NOTICE CERTIFICATION FORM AND A HARD-COPY OF THE PUBLIC NOTICE IS COMPLETED AND MAILED WITH CCR PACKET TO IEPA

TIER 3 PUBLIC NOTICES IN e-CCR

- KEEP IN MIND THAT SOME PUBLIC NOTICES/CERT. FORM MUST ALSO BE SENT TO THE ILL. DEPT. OF PUBLIC HEALTH, SUCH A P.N. FOR FLUORIDE EXCEEDANCE OF SECONDARY

****FLUORIDE EXCEEDANCE OF 2.0 MG/L BUT UNDER 4.00 MG/L REQUIRES A P.N. AND P.N. CERTIFICATION FORM BE SENT TO BOTH IEPA CAS AND THE IDPH**



WHAT IF REQUEST IS MADE FOR HARD COPY OF CCR?

- IF THERE IS A REQUEST FOR A HARD-COPY OF THE CCR:
- THE CWS MUST NOW DO A DIRECT-MAIL OR HAND-DELIVERY TO FULFILL THAT REQUEST
- WE CAN NO LONGER TELL THE REQUESTER TO COME TO US FOR THE REPORT
- CANNOT CHARGE FOR COPY OF REPORT OR RELATED COSTS
- CCR IS NOT A FOIA-ABLE DOCUMENT



GOOD FAITH EFFORTS (SECONDARY)

- ALSO MAKE A GOOD FAITH EFFORT FOR AVAILABILITY TO THE PUBLIC:
- POST IN SCHOOLS, PUBLIC LIBRARIES, MUNICIPAL HALLS, OTHER PUBLIC BUILDINGS
- PROVIDE EXTRA COPIES TO OWNERS OF HOUSING
- FACEBOOK & TWITTER CAN ONLY BE USED AS GOOD FAITH EFFORTS



FINAL COPY SENT TO IEPA VIA MAIL

- PACKET MUST INCLUDE:
- COMPLETED AND SIGNED CCR CERT. FORM
- HARD COPY OF CCR, AS ON WEBSITE
- HARD COPY OF BILL INSERT OR BILL
W/NOTIFICATION OF e-CCR & WEBSITE
- HARD COPY OF EMAIL NOTIFICATION TO E-
PAY OR AUTO-PAY CUSTOMERS W/SUBJECT
LINE, WEBSITE ADDRESS, AND LINK

FINAL COPY SENT TO IEPA VIA MAIL

- PACKET CONTENTS (CONTINUED)
- EMAIL NOTIFICATION OF CCR
 - STATEMENT THAT HARD COPIES WERE SENT TO THESE ADDRESSES W/NOTIFICATION THAT REPORT WAS MAILED
- ANY GOOD FAITH (SECONDARY) EFFORTS



IMPORTANT INFORMATION ABOUT CCR CERTIFICATION FORM

- E-CCR CERTIFICATION FORM DIFFERS FROM STANDARD FORM
- CONTACT CCR COORDINATOR OF YOUR SYSTEM'S PLANS TO USE e-CCR AND THE NEED FOR THIS FORM BEFORE PROCEEDING
- FORM WILL BE FORWARDED TO YOU



FINAL COPY SENT TO IEPA VIA MAIL

- ENTIRE PACKET MUST BE SUBMITTED TO:

ILL ENVIRONMENTAL PROTECTION AGENCY

CCR COORDINATOR

BOW/CAS #19

1021 NORTH GRAND AVENUE EAST

POST OFFICE BOX 19276,

SPRINGFIELD, ILLINOIS 62794-9276



IF YOU USE THE WEBSITE OPTION

- YOU CAN USE YOUR CWS WEBSITE OR OTHER WEBSITES
- IN ANY AND ALL CASES:
- WEBSITE ADDRESS MUST TAKE CUSTOMER **DIRECTLY** TO CCR
- CUSTOMERS HAVE TO BE NOTIFIED OF AVAILABILITY VIA BILLING, POSTCARD, QUARTERLY NEWSLETTER, OR OTHER NOTICE TO ALL CUSTOMERS



CASE STUDY FROM LAST YEAR

- CITY OF NEW BERLIN, ILLINOIS
- COMPLETED CCR, INCLUDING PARENT SUPPLY INFORMATION
- CWS'S WEBSITE ADMINISTRATOR ADDED ADDRESS TAKING CUSTOMERS DIRECTLY TO CCR
- CLERK ADDED REQUIRED LANGUAGE TO MONTHLY BILLS
- SUBMITTED FINAL PAPERWORK TO IEPA
- SAVED SYSTEM HUNDREDS OF \$\$



PLANS FOR THIS YEAR

- ABS WATER COOPERATIVE
- COVERS MASSIVE AREA IN W. CENTRAL ILL.
- CWS HAD TO USE FOUR DIFFERENT PUBLICATIONS TO COVER SERVICE AREA
- ABS USES A TWO-YEAR PAYMENT BOOK
- INSERTS OF CCR NOTIFICATION/WEBSITE WILL BE INCLUDED AT FRONT OF BOOK AS WELL AS AT APPROPRIATE MONTHS.
- EST. SAVINGS OF \$2000.00/YEAR



WHAT IF YOU DON'T HAVE YOUR OWN WEBSITE?

- ILL. RURAL WATER ASSN. HAS AN OPTION FOR YOU
- PERFORMED TRIAL WORK W/CWS LAST YEAR
- VERY SUCCESSFUL
- NOW OFFERING ASSISTANCE TO PLACE YOUR CCR ON OUR WEBSITE
- ADDRESS TAKES YOU DIRECTLY TO YOUR CCR
- ADMIN. COST OF \$50.00/YEAR



TRIAL CWS LAST YEAR

- CITY OF MACON
- CWS PROVIDED COMPLETED CCR TO IRWA
- IRWA POSTED CCR ON DEDICATED WEBSITE ADDRESS (BELOW)
- CWS PROVIDED CUSTOMER NOTICE ON MONTHLY BILLS
- VIEW 2012 CCR AT:

<http://www.ilrwa.org/CCR/macon2012/pdf>



IRWA WEBSITE ASSISTANCE

- IF YOU CONSIDER THIS OPTION
- AND IF YOU DON'T HAVE YOUR OWN WEBSITE
- CONTACT HEATHER AT OUR OFFICE AT 217-287-2115 FOR DETAILS



OTHER CCR QUESTIONS

- FOR THE ANSWERS TO OTHER CCR QUESTIONS:
- CONTACT CCR COORD. MARY REED AT
- PHONE: 217-785-0561
- EMAIL: mary.f.reed@illinois.gov



ANY QUESTIONS OR COMMENTS?