Preparing Consumer Confidence Reports Using CCRiWriter

Hip Pocket Tools for Operators
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Consumer Confidence Report Facts…

Consumer Confidence Reports (CCRs) are the centerpiece of the right-to-know provisions of the 1996 Amendments to the Safe Drinking Water Act. Every community waterworks owner must distribute a CCR each year that contains information about the drinking water provided to its customers during the previous calendar year.

CCRs must be delivered to all customers (those that receive water bills), and waterworks must make a "good faith effort" to distribute CCRs to other consumers who do not receive water bills. Waterworks serving 100,000 or more persons must also post current reports on a publicly accessible site on the Internet.

Waterworks are required to send a copy of the final CCR to the appropriate Office of Drinking Water (ODW) field office at the same time the report is distributed to customers. They must also send ODW a signed certification form indicating how and when the report was distributed.

About CCRiWriter…

CCRiWriter is a free, web-based tool created by EPA that waterworks can use to quickly and easily prepare CCRs. The program asks a series of questions about source water and detected contaminants. CCRiWriter provides required information, such as definitions and mandatory language, and it is updated as new federal reporting requirements are issued. Reports can be readily edited to meet the needs of your waterworks.

Training Objectives…

At the end of this session, you will have prepared a CCR for your waterworks for the current year that meets all state and federal requirements for content. By following the guidelines in this booklet and in the CCRiWriter program, you will also be prepared to produce CCRs for your waterworks in the future.
What you will need...

1. A computer with Internet access.
2. A printer.
3. A blank diskette or CDRom to save a copy of your completed CCR.
4. Copies of all chemical and bacteriological water quality sampling results from the report year. For contaminants that are sampled less than once each year, you will need sample results from the previous five years. For contaminants with compliance based on running averages, you will need results from the current and previous year.
5. Copies of any Notices of Violation (NOVs) you received during the report year.

Welcome to the CCRiWriter

1. Open the CCRiWriter web page at www.ccriwriter.com
2. From the Welcome Screen you can log in to an existing account or sign up for a new user account:
   
   Record your User Name here:
   
   Record your Password here:

Existing Reports

The Existing Reports screen will show a list of reports you have previously started or completed. You can open and view or edit an existing report, or start a new report by clicking Start New Report.

System Information

At this point, you will begin entering information that will appear in your final product.

Rather than refer to your report as a Consumer Confidence Report, we suggest that you use the words “Water Quality Report” in the title, along
with the year the report is covering, for example, “2006 Water Quality Report.”

CCRs must include contact information for your waterworks, including a contact name, address, and phone number. If possible, provide a business address and number rather than personal information.

**Multiple Water Sources**

If you are responsible for more than one public waterworks, you will have to prepare separate CCRs for each waterworks, or use a different method for creating your CCR. CCR\i Writer does not support combining multiple waterworks reports into a single document. However, you can use CCR\i Writer to create reports for more than one waterworks from the same user account.

**Contaminant Information Summary**

At the contaminant information summary screen, you will begin entering results of detected contaminants from your lab reports. Selecting will take you to a drop down list of regulated contaminants that must be reported in your CCR if they have been detected. Selecting the button will take you to screens for entering the data from your lab reports.

When you enter result details in the Contaminant Data Information screens (described below), the information is automatically summarized in a table at the Contaminant Information Summary page.

<table>
<thead>
<tr>
<th>Contaminant</th>
<th>Reported Level</th>
<th>MCL</th>
<th>Edit</th>
<th>Delete</th>
</tr>
</thead>
<tbody>
<tr>
<td>Copper - action level at consumer taps</td>
<td>0.87 ppm</td>
<td>1.3 ppm (AL)</td>
<td>Edit</td>
<td>Delete</td>
</tr>
<tr>
<td>Lead - action level at consumer taps</td>
<td>6 ppb</td>
<td>15 ppb (AL)</td>
<td>Edit</td>
<td>Delete</td>
</tr>
<tr>
<td>Nitrate [measured as Nitrogen]</td>
<td>2 ppm</td>
<td>10 ppm</td>
<td>Edit</td>
<td>Delete</td>
</tr>
<tr>
<td>Total Coliform</td>
<td>1 positive samples/month</td>
<td>1 positive samples/month</td>
<td>Edit</td>
<td>Delete</td>
</tr>
</tbody>
</table>

From here, you can make changes at any time to the information you have already entered by clicking Edit. If you need to remove all of your entries for a contaminant and start over, click Delete on the table.
Once you have created an entry for a contaminant, it no longer appears in the drop down list of regulated contaminants.

Contaminant Data Information

1. Enter the value used to determine compliance for the detected contaminant for the report year, and enter the reporting unit as it appears on the lab report. The value can be a single result, the highest result, or the highest average result you obtained for the reporting period. CCR\Writer will automatically convert units to required formats, and insert appropriate definitions in your final document.

2. Indicate whether the value you are including in the current report is for the current year. For contaminants that are sampled less frequently than annually, you should provide information from the most recent samples collected during the previous five years. For example, a waterworks is preparing a CCR for 2006, but it samples for metals only once every three years. The last reported results for metals are from 2005. If any regulated metals were detected in the 2005 sample, they should be included in the 2006 CCR.

If you are reporting results where compliance is based on running averages, some of the results used to determine compliance will also be from the previous reporting year.

3. Answer screen questions to determine if the CCR should include a range of results or a summary of results for a given contaminant. If more than one result must be entered for the scenario you describe, the program will provide fields for entering these results on subsequent screens.

If you enter a scenario where more than one sample is used to determine compliance, CCR\Writer will ask if the contaminant was found in all samples. If “yes,” the program will ask you to provide the value used to determine compliance, and the highest and lowest values that were reported. If “no,” CCR\Writer will automatically report the lowest value as “not detected,” and you will only have to enter the highest value used to determine compliance.

CCR\Writer Tips

- If you have more than one lab report to include in the current CCR for each contaminant, organize and group your paperwork before you start entering results.

- CCR\Writer allows the option of including contaminants that were tested but not detected, but unless you have a clear reason for doing so, we do not recommend this option. Too much information makes your report harder to understand.

- If you do not enter required information, CCR\Writer will not let you proceed to the next screen.
If the results for the contaminant that you are entering are below the Maximum Contaminant Level (MCL), the final screen will ask you to review the recommended language to include in the report to describe its typical source. We do not recommend making any changes to the suggested language. Hitting the button will return you to the Contaminant Information Summary screen, and the process is repeated until all results of detected contaminants are entered.

If the results you have entered for the contaminant exceed the MCL, CCR\Writer will open a new screen showing mandatory health effects language that will be included in the final product. At this screen, you will be asked to provide additional, required information about

1. How the violation occurred and how long it lasted, and
2. What actions were taken to correct the violation.

The violation information you provide should be factual, brief, and plainly stated. For example, if your waterworks exceeded the MCL for total coliform bacteria after performing system maintenance, your explanation might read, “The MCL was exceeded after the well pump was replaced. The violation lasted for less than one week. We disinfected the well as directed by the health department, and all follow-up samples were satisfactory.”

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**CCR\Writer Tip**

If you sample for contaminants with compliance based on running annual averages, you will also have to consider results from the previous reporting year. The best way to determine which results to include in your CCR is to sketch a table of the reported results.

For example, a waterworks is required to perform quarterly sampling because benzene has been detected. In this example, results from the last three quarters of 2005 are included, because they are used to calculate some of the running annual averages in 2006. The tabulated benzene results are...

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>4 ppb</td>
<td>3 ppb</td>
<td>2 ppb</td>
<td>1 ppb</td>
<td>3 ppb</td>
<td>2 ppb</td>
<td>2 ppb</td>
<td>3 ppb</td>
</tr>
<tr>
<td>Running Average</td>
<td></td>
<td></td>
<td><strong>3 ppb</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

The waterworks should enter 3 ppb as the reported value, because this is the highest of the running annual averages used to determine compliance. The lowest and highest of the detected results (1 ppb and 4 ppb) are also entered into CCR\Writer as the range of all of the results that were used for calculating the averages.

Additional sampling scenarios can be found in the EPA guidance manual “Preparing Your Drinking Water Consumer Confidence Report,” at

[www.epa.gov/safewater/ccr/pdfs/guide_ccr_forwatersuppliers.pdf](http://www.epa.gov/safewater/ccr/pdfs/guide_ccr_forwatersuppliers.pdf)
If you are not sure what information to include, refer to the information that was included in the Notice of Violation you received for exceeding the MCL. If you are still unsure of what violation information to provide, contact your ODW representative for assistance.

After all required MCL violation information is entered, hitting the button will return you to the Contaminant Information Summary screen, and the process is repeated until all results of detected contaminants are entered.

When you have entered all of your contaminant data, hit the button to move on to the next section of your report.

**UCMR Contaminant Information**

Very few waterworks participate in Unregulated Contaminant Monitoring Rule sampling in Virginia. If you are unsure whether you must provide UCMR results in your CCR, consult your ODW representative. If your waterworks does perform UCMR sampling, results must be included in your CCR in a separate table. For UCMR contaminants, CCR:iWriter will provide a different drop-down list. Enter UCMR results directly into CCR:iWriter as you would in the Contaminant Data Information section above.

**Additional Contaminant Information**

CCR:iWriter makes it possible for you to provide optional water quality sample results that are not required by the CCR regulations. However, all optional results will appear in a clearly marked separate table in your final report.

For example, iron is a common drinking water contaminant in Virginia for which you may have test results, but current state and federal requirements do not require that it be included in CCRs. If you wish to include optional water quality results for your waterworks, the process for entering results is similar to that for the required contaminants (refer to the Contaminant Information Summary and Contaminant Data Information sections, above). However, there are no drop down lists of contaminants, and the information must be entered manually.

**CCR:iWriter Tip**

Clicking the “Save” button in the upper left corner of the screen will keep you from losing information you have entered if the program “times out” or if there are electrical power problems. Click on “Save” frequently as you work through the program – whenever you take a break, or when you progress from section to section.
Cryptosporidium Monitoring

Radon Monitoring

Voluntary Monitoring

If the waterworks performed sampling for cryptosporidium, radon, or performed voluntary testing, CCR://Writer will create sections in your final report for providing this information. Most of the information must be entered manually at the Section Summary screen (see below).

Compliance with Other Rules

CCR://Writer will ask for “yes” or “no” responses for other rules that may have been violated during the report year. For any “yes” response you will be prompted to provide additional information or explanations at the Section Summary screen (see below).

The most common violations that occur are for failure to collect all required samples. If your waterworks incurred sampling violations, your explanation should include a description of the missed sample, when it was required, and the corrective actions you have taken. You should also note that by not collecting a required sample, the possible health effects of not sampling during that period are not known.

For example, if you failed to collect a required monthly bacteriological sample your entry might read, “We failed to collect a required bacteriological sample during March 2006. The health effects of not sampling during this period are not known. We collected all required samples after that time, and have increased our efforts to ensure that all samples are collected as required by state regulations.”

CCR://Writer Tip

CCR://Writer breaks down the CCR into various sections. As each section is created, the section’s name will appear in the blue box at the left of the computer screen. The screen that is currently open appears in yellow.

Navigation List

Welcome
Existing Reports
System Information
Multiple Water Sources
Contaminant Information
UCMR Information
Additional Contaminants
Cryptosporidium Monitoring
Radon Monitoring
Voluntary Monitoring
Compliance with Other Rules

You can quickly move to another section by clicking on its name in this box.
Variances and Exceptions

It is unlikely that your waterworks has been granted a variance or exception to report in your CCR, but if so, check “yes” at this screen. You will be prompted to provide additional information at the Section Summary screen (see below).

Additional Languages

If your waterworks serves a large number of non-English speaking customers, you must provide a statement in the appropriate language describing the report’s importance. Check the boxes that apply. CCRiWriter will automatically include a statement in your final product. Statements in other languages are available from your ODW representative on request, but the statements must be entered manually.

Report Options

CCRiWriter can automatically create an optional section for additional information that may be of benefit to your customers. For example, you can create a section to remind customers about the waterworks Cross Connection Control Program. This section is for manual completion at the Section Summary screen (see below).

If your waterworks met all drinking water standards, CCRiWriter can also insert an optional report section indicating that the water is safe. This section can be left out, accepted as is, or edited manually at the Section Summary screen (see below).

Create Report

In this section you will have an opportunity to review and edit all of the information you have entered so far. You will also manually complete any optional sections you have created.

Create Report – Data Review

CCRiWriter will indicate that all contaminant information is complete, or prompt you to return to a section that is missing essential parts.
Create Report – Report Section Summary

In this area CCR/Writer provides a summary table of all of the text portions of the final CCR. The table will show what report sections have been automatically completed by CCR/Writer, and what sections must be completed manually.

<table>
<thead>
<tr>
<th>Section Title</th>
<th>Text Entered</th>
<th>Edit</th>
</tr>
</thead>
<tbody>
<tr>
<td>Is my water safe?</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>Do I need to take special precautions?</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>Where does my water come from?</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>Source water assessment and its availability</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>Why are there contaminants in my drinking water?</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>How can I get involved?</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>Monitoring and reporting of compliance data violations</td>
<td>No</td>
<td></td>
</tr>
</tbody>
</table>

All of the sections can be edited. However, our recommendation is to use the language that CCR/Writer automatically provides. By clicking the button you can browse through all of the sections shown in the table. To go directly to a section that must be completed manually click Edit. You can return to the summary table from any of the section screens by clicking on .

The table above shows that four sections still do not have text entered and are incomplete. These sections require manual editing to finish the CCR. The first three of these sections are mandatory elements that must be included in all CCRs:

1. **Where does my water come from?** You should provide a brief description of the source and its location. For example: “Our water is groundwater from from two wells located at the north end of the subdivision.”

2. **Source water assessment and its availability.** If a source water assessment has been done, we suggest that you include the following statement:

   “A source water assessment of our system was conducted by the Virginia Department of Health. The well/spring/reservoir/river [insert the appropriate source type] was determined to be of __________________ susceptibility [choose the appropriate term from the Source Water Assessment Report] to contamination using the criteria developed by the
state in its approved Source Water Assessment Program. The assessment report consists of maps showing the source water assessment area, an inventory of known land use activities of concern, and documentation of any known contamination. The report is available by contacting your water system representative at the phone number or address given elsewhere in this annual report."

3. How can I get involved? You must provide a brief statement on how consumers can participate in decisions that affect their water supply. For example:

- “Water issues are discussed each year at the annual homeowners’ meeting, held the first Tuesday in October in the community center.”
- “For more information on how to participate in decisions that affect our water supply call Joe Smith at 987-5643.”

For some contaminants (arsenic, lead, nitrate, and trihalomethanes) CCR:iWriter will automatically insert special consumer information statements. We recommend that you use the language exactly as provided without editing.

If you checked boxes in previous sections of CCR:iWriter indicating that the waterworks conducts monitoring for cryptosporidium, radon, or performs other voluntary sampling, the summary table will show that additional text must be provided. Likewise, if you indicated that the waterworks has a variance or exemption, or rule compliance problems, the table will prompt you to complete the section. You will not be able to generate a final report until text has been entered for each section shown in the table.

When text has been entered for all sections, either automatically or manually, a button will appear on the Report Section Summary Screen:

![Important Message]

Click on the Report button to generate your final report.

Create Report – Report Output

CCR:iWriter will generate your final CCR in two formats. The HTML version is for waterworks that will post the report for consumer access on the Internet. The Rich Text file should be downloaded for making printed copies to distribute to customers.
The Rich Text file can be converted to a variety of word processing programs, such as Microsoft Word or Word Perfect. Once the final report has been opened in a word processing program, you should save a copy of the report on a diskette or CD Rom.

At this point, the report can still be edited, either by returning to CCRiWriter, or by making changes directly to the word processing version.

Proofread the final version carefully. If all of the information is correct, you are ready to print copies to distribute to your customers.

Review questions…

1. The deadline for distributing the annual CCR each year is ______________
2. For distributing CCRs, making a “good faith effort” means ______________________________________________________________
   ______________________________________________________________
3. TRUE or FALSE – CCRiWriter will automatically prompt the user to give a range of results if more than one sample result is available for a given contaminant.
4. TRUE or FALSE – Even though CCRiWriter automatically provides a description of typical sources of contamination for each contaminant, it is usually better to manually customize this information.
5. Once a final CCR has been produced using CCRiWriter, what are the two ways to edit or change the report? Which method do you think is best?

More information on Consumer Confidence Reports can be found at…

http://www.vdh.state.va.us/drinkingwater/Owners/confidence.htm
http://water.epa.gov/lawsregs/rulesregs/sdwa/ccc/index.cfm