PREPARATION GUIDELINES FOR CONSUMER CONFIDENCE REPORTS

Virginia Department of Health – Office of Drinking Water

Have you started preparing your Consumer Confidence Report for Calendar Year 2025?

Background

All community waterworks are required to distribute a Consumer Confidence Report (CCR) by July 1, 2026, for calendar year 2025. There are no new requirements for the 2025 CCR.

Lead and Copper Rule Revisions (LCRR) Requirements

The Lead and Copper Rule Revisions require the following in the CCR:

- Include the range of lead and copper tap sample results; and
- Include a statement that a service line inventory (including inventories consisting only of a statement that there are no lead service lines) has been prepared and include instructions to access the service line inventory.

Unregulated Contaminant Monitoring Rule (UCMR) Requirements

- Any 2025 Unregulated Contaminant Rule 5 (UCMR5) sampling results, such as PFAS, from participating waterworks are to be included.
- Waterworks that completed UCMR5 sampling during 2025 are required to provide a special notice of the availability of UCMR monitoring results.
- The special monitoring results for sodium are to be included in the CCR (in accordance with 40 CFR §141.41 and 12VAC5-590-545 C 4 c).

Important Deadlines to Remember for 2026

May 1, 2026	**Last day** to submit a draft copy of the CCR to your Field Office (FO) if a review is desired before the CCR is distributed. The review may take two to four weeks.
July 1, 2026	**Last day** to distribute the CCR to customers, and submit a copy to your FO, covering water quality data for calendar year 2025.
October 1, 2026	**Last day** to send signed certification form to your FO.

Actions to be taken for the Revised Total Coliform Rule (RTCR)

1. ***Health Effects Language***
   Health effects language for total coliform bacteria is used when assessments are required to be performed.

   If a Level 1 or Level 2 Assessment is required (not due to an *E. coli* Primary Maximum Contaminant Level (PMCL) violation):

   Coliforms are bacteria that are naturally present in the environment and are used as an indicator that other, potentially harmful, waterborne pathogens may be present or that a potential pathway exists through which contamination may enter the drinking water distribution system. We found coliforms indicating the need to look for potential problems

in water treatment or distribution. When this occurs, we are required to conduct assessments to identify problems and to correct any problems that are found.

2. ***If an E. coli PMCL violation occurs:***
   The following health effects language applies to *E. coli*.

   E. coli are bacteria whose presence indicates that the water may be contaminated with human or animal wastes. Human pathogens in these wastes can cause short-term effects, such as diarrhea, cramps, nausea, headaches, or other symptoms. They may pose a greater health risk for infants, young children, the elderly, and people with severely-compromised immune systems. We found E. coli bacteria, indicating the need to look for potential problems in water treatment or distribution. When this occurs, we are required to conduct assessment(s) to identify problems and to correct any problems that were found during these assessments.

3. ***Reporting Requirements:***
   The total number of positive *E. coli* samples must be reported in the "detects" table of contaminants (see below).

4. ***Completing the "Detects" Table***

   The detection of *E. coli*, regardless of if it is associated with an *E. coli* PMCL violation must be included in the "detects" table of contaminants. Detection *E. coli* but NO *E. coli* PMCL violation (optional text by the waterworks owner).

   If a waterworks detects E. coli and has not violated the E. coli PMCL, the waterworks owner must complete the "detects" table in the CCR, and may include a statement that explains that although they have detected E. coli, they are not in violation of the E. coli PMCL.

   All other detects on the other rules are to be reported in the same manner as has been done in previous years.

5. ***Reporting on assessments not involving an E. Coli PMCL violation***

   For a waterworks required to complete a Level 1 or a Level 2 assessment that is NOT due to an *E. coli* PMCL violation, the CCR must include the specific text for the following:

   Presence of coliforms
   Coliforms are bacteria that are naturally present in the environment and are used as an indicator that other, potentially harmful, waterborne pathogens may be present or that a potential pathway exists through which contamination may enter the drinking water distribution system. We found coliforms indicating the need to look for potential problems in water treatment or distribution. When this occurs, we are required to conduct assessments to identify problems and to correct any problems that are found.

   Activity associated with a Level 1 assessment (fill-in-the-blank)
   During the past year, we were required to conduct (_____insert the number of Level 1 assessments) Level 1 assessments. (_____insert the number of Level 1 assessments) Level 1 assessments were completed. In addition, we were required to take (_____insert the number of corrective actions) corrective actions and we completed (_____insert the number of corrective actions) of these actions.

Activity associated with a Level 2 assessment (fill-in-the-blank)
During the past year (_____insert the number of Level 2 assessments) Level 2 assessments were required to be completed for our waterworks. (_____insert the number of Level 2 assessments) Level 2 assessments were completed. In addition, we were required to take (_____insert the number of corrective actions) corrective actions and we completed (_____insert the number of corrective actions) of these actions.

Waterworks failure to complete all required activities
Any owner who failed to complete all of the required assessments or correct all identified sanitary defects shall also include one or both of the following statements in the CCR, as appropriate:

- *During the past year, we failed to conduct all of the required assessments.*
- *During the past year, we failed to correct all identified sanitary defects that were found during the assessments.*

6. ***Reporting on assessments involving an E. Coli PMCL violation***
For a waterworks required to complete a Level 2 assessment due to an *E. coli* PMCL violation, the CCR must include the specific text for the following:

Presence of *E. coli*
E. coli are bacteria whose presence indicates that the water may be contaminated with human or animal wastes. Human pathogens in these wastes can cause short-term effects, such as diarrhea, cramps, nausea, headaches, or other symptoms. They may pose a greater health risk for infants, young children, the elderly, and people with severely compromised immune systems. We found E. coli, indicating the need to look for potential problems in water treatment or distribution. When this occurs, we are required to conduct assessments to identify problems and to correct any problems that are found.

Activity associated with a Level 2 assessment (fill-in-the-blank)
We were required to complete a Level 2 assessment because we found E. coli in our waterworks. In addition, we were required to take (_____insert number of corrective actions) corrective actions and we completed (_____insert number of corrective actions) of these actions.

Waterworks failure to complete all required activities
Any owner who failed to complete all the required assessment or correct all identified sanitary defects shall also include one or both of the following statements in the CCR, as appropriate:

- *We failed to conduct the required assessment.*
- *We failed to correct all sanitary defects that were identified during the assessment that we conducted.*

Detection of E. coli and incurring an E. coli PMCL violation
If a waterworks detects *E. coli* and has violated the *E. coli* PMCL, the waterworks owner must complete the “detects” table in the CCR, and shall include one or more of the following statements to describe any noncompliance, as applicable:

- *We had an E. coli-positive repeat sample following a total coliform-positive routine sample.*

- *We had a total coliform-positive repeat sample following an E. coli-positive routine sample.*
- *We failed to take all the required repeat samples following an E. coli-positive routine sample.*
- *We failed to test for E. coli when any repeat sample tested positive for total coliform.*

General Delivery Requirements

- CCR must be mailed or directly delivered to all customers who receive a water bill, and a "good faith" effort must be made to reach other consumers who do not receive a water bill. Electronic delivery methods are allowed, and a separate summary/explanation is available from your FO.
- A copy of the CCR must be sent to your FO at the same time as it is distributed to the customers, and a copy must be given to anyone who requests it.
- Waterworks serving fewer than 10,000 persons may publish the CCR in a local newspaper instead of mailing or direct delivery. The customers must be informed that the CCR will not be mailed, and a copy of the CCR will be made available to the public upon request.
- Waterworks owners should already have all the necessary information to complete the CCR. Contact your FO for any desired assistance.

Definitions

Include the following definitions (reference 12VAC5-590-545 C 2 for the definitions):

- PMCL, MCLG
- As applicable, definitions for Level 1 Assessment, Level 2 Assessment, treatment technique, MRDL, MRDLG, action level, variances, and exemptions.

Table of detected contaminants

- All regulated contaminants (as listed in Section 12VAC5-590-546 of the *Waterworks Regulations*) detected in compliance samples collected in calendar year 2025 must be listed in a specific manner. Pay close attention to unique reporting requirements for finished water turbidities (applies to surface water sources), distribution system coliform bacteria and treatment technique triggers, and tap sample lead and copper results.
- The likely source of each detected contaminant must be included, using the best information available from the list of sources in Section 12VAC5-590-546, Table 546.1. Contact your FO or use this link: 12VAC5-590-546, Table 546.1
- Any waterworks participating in the UCMR5 program for which sampling results were received for samples collected in 2025 must include these results in the CCR. For detected UCMR5 contaminants, the table(s) must contain the average and range at which the contaminant was detected. The report must include a brief explanation of the reasons for monitoring for unregulated contaminants.
- If compliance samples were not collected in 2025, then the most recent results from compliance samples collected in calendar years 2021 through 2024 must be used. Do not use any sample results before 2021.
- Total organic carbon (TOC) must be listed as a treatment technique (TT) by surface water systems if it was detected in the raw and finished water. If TOC is detected, the percent

removal should be reported. Actual TOC concentrations and removal ratios do not have to be listed.

- Owners may want to include a brief statement at the end of the table to explain that many other contaminants were analyzed but were not detected. Otherwise, customers may think that no samples were collected. For example, if coliform bacteria were not detected during the entire year, it may be important to mention that.
- Listing of contaminants that were not detected or are not regulated is allowed, but the sample results should be placed in a separate table. Non-regulated contaminants include iron, manganese, pH, hardness, alkalinity, MTBE, sodium and many others (contact your FO for more info). Owners may want to briefly mention these non-detected or non-regulated contaminants if customers may have a special interest in them.
- Although sodium is not regulated, owners are required to report the levels analyzed. Report sodium along with other unregulated or undetected contaminants.
- Consecutive (or secondary) waterworks must include all regulated contaminants detected in compliance samples collected in its own distribution system and regulated contaminants detected by the primary system (or wholesaler) at its water treatment plant(s) and entry point(s). Contact the primary system to obtain the necessary compliance results that pertain to the secondary system.

Arsenic

If arsenic was detected at a level greater than 5 ppb but less than or equal to 10 ppb in the most recent compliance sample collected in 2021-2025 time period, the following educational information must be included. This is in addition to the required information in the table of detected contaminants.

While your drinking water meets EPA's standard for arsenic, it does contain low levels of arsenic. EPA's standard balances the current understanding of arsenic's possible health effects against the costs of removing arsenic from drinking water. EPA continues to research the health effects of low levels of arsenic which is a mineral known to cause cancer in humans at high concentrations and is linked to other health effects such as skin damage and circulatory problems.

Cryptosporidium

If any monitoring performed during 2025 indicated cryptosporidium may be present in the raw or finished water, a summary and explanation of the results must be included.

Groundwater Systems

Special information must be included if the following conditions occurred (contact your FO for more details):

- A significant deficiency identified by the state during a sanitary survey remains uncorrected.
- A source water sample (triggered sample or an additional sample following a triggered sample) indicated the presence of fecal coliform or *E. coli*.

Violations

Each violation for monitoring, reporting, PMCL, maximum residual disinfectant level, and treatment technique (TT) that occurred in 2025 must be explained by describing the length of the violation, potential adverse health effects, and corrective actions taken. If a violation from an earlier year is carried over into 2025, it also must be reported. This is in addition to the information that must be included in the table of detected contaminants when an MCL or TT violation has occurred.

EPA recommends that systems include TT violations in a table adjacent to the main detected contaminant table. The table must include an explanation of the violation, the length of the violation, any potential adverse health effects, and steps taken to correct the violation.

Waterworks that failed to complete a lead service line inventory after October 16, 2024, or as required by 40 CFR §141.84(a) or reported their inventory but failed to make it publicly available, must identify this violation in the 2024 CCR regardless of when or if they received a notice of alleged violation.

Failure to develop and submit an initial service line inventory (inventory not yet submitted to VDH).

TT Violation	Explanation	Length	Steps Taken to Correct the Violation	Health Effects Language
Failed to develop and submit the initial lead service line inventory by October 16, 2024.	We were required to develop and make publicly available an initial inventory of service lines connected to our distribution system by October 16, 2024. We failed to develop and submit this initial inventory of service lines to the Virginia Department of Health by October 16, 2024.	Ongoing	[Modify to reflect steps taken and expected completion.] We hired a consultant to assist in completing and submitting the initial service line inventory. We expect to submit the inventory by October 16, 2025.	Exposure to lead in drinking water can cause serious health effects in all age groups. Infants and children can have decreases in IQ and attention span. Lead exposure can lead to new learning and behavior problems or exacerbate existing learning and behavior problems. The children of women who are exposed to lead before or during pregnancy can have increased risk of these adverse health effects. Adults can have increased risks of heart disease, high blood pressure, kidney or nervous system problems.

Late completion and submittal of an initial service line inventory (inventory submitted after October 16, 2024).

TT Violation	Explanation	Length	Steps Taken to Correct the Violation	Health Effects Language
Failed to develop and submit the initial lead service line inventory by October 16, 2024.	We were required to develop and make publicly available an initial inventory of service lines connected to our distribution system by October 16, 2024. We failed to develop and submit this initial inventory of service lines to the Virginia Department of Health by October 16, 2024.	91 days [Modify to reflect actual.]	[Modify to reflect steps taken and completion date.] We hired a consultant who assisted in completion and submittal of the initial service line inventory. We submitted the service line inventory on January 15, 2025.	Exposure to lead in drinking water can cause serious health effects in all age groups. Infants and children can have decreases in IQ and attention span. Lead exposure can lead to new learning and behavior problems or exacerbate existing learning and behavior problems. The children of women who are exposed to lead before or during pregnancy can have increased risk of these adverse health effects. Adults can have increased risks of heart disease, high blood pressure, kidney or nervous system problems.

Failure to make initial service line inventory publicly accessible.

TT Violation	Explanation	Length	Steps Taken to Correct the Violation	Health Effects Language
Failed to make publicly available the initial lead service line inventory by October 16, 2024.	We were required to make publicly available an initial inventory of service lines connected to our distribution system by October 16, 2024.	[Modify to include and actual or expected completion.] 91 days	[Modify to reflect steps taken and completion date.] We hired a contractor who assisted in making the initial service line inventory available online. We made the service line inventory available	Exposure to lead in drinking water can cause serious health effects in all age groups. Infants and children can have decreases in IQ and attention span. Lead exposure can lead to new learning and behavior problems or exacerbate existing learning and behavior problems. The children of women who are exposed to lead before or during pregnancy can have increased risk of these adverse health effects. Adults can have increased risks of heart disease, high

			online on January 15, 2025.	blood pressure, kidney or nervous system problems.

The health effects language, required if there a violation of the Lead and Copper Rule, is revised by the LCRR as follows:

Exposure to lead in drinking water can cause serious health effects in all age groups. Infants and children can have decreases in IQ and attention span. Lead exposure can lead to new learning and behavior problems or exacerbate existing learning and behavior problems. The children of women who are exposed to lead before or during pregnancy can have increased risk of these adverse health effects. Adults can have increased risks of heart disease, high blood pressure, kidney or nervous system problems.

Required additional health information for lead

The following language is mandatory for every waterworks regardless of the lead compliance sample results:

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 and removing lead pipes, but cannot control the variety of materials used in plumbing components in your home. You share the responsibility for protecting yourself and your family from the lead in your home plumbing. You can take responsibility by identifying and removing lead materials within your home plumbing and taking steps to reduce your family's risk. Before drinking tap water, flush your pipes for several minutes by running your tap, taking a shower, doing laundry or a load of dishes. You can also use a filter certified by an American National Standards Institute accredited certifier to reduce lead in drinking water. If you are concerned about lead in your water and wish to have your water tested, contact [NAME OF UTILITY and CONTACT INFORMATION]. Information on lead in drinking water, testing methods, and steps you can take to minimize exposure is available at ***http://www.epa.gov/safewater/lead****.*

Special notice of the availability of UCMR monitoring results.

The owner of a community waterworks or a nontransient noncommunity (NTNC) waterworks required to monitor under the UCMR must notify persons served by the system of the availability of the results of such sampling no later than 12 months after the monitoring results are known (12VAC5-590-540 A 3 d). The public notice must follow the requirements for a Tier 3 public notice prescribed in 12VAC5-590-540 C 3. The notice must also identify a person and provide the telephone number to contact for information on the monitoring results. For a community waterworks, the CCR may be used as a vehicle for the special notice, provided that:

1. The CCR is provided to persons served by the waterworks no later than 12 months after the owner learns of the results.
2. The Tier 3 public notice contained in the CCR meets the content requirements noted above and described in 12VAC5-590-540 F.

3. Distribute by mail or otherwise directly deliver the public notice to each customer receiving a bill and to other service connections to which water is delivered by the waterworks (12VAC5-590-540 C 3 e (1)).

PFAS Sampling Results

VDH recommends that waterworks that detect PFAS in their drinking water should share this information with their customers, including in the CCR. This includes sampling conducted by VDH and the waterworks (other than UCMR5). This should be reported in a separate table to clarify that PFAS is not regulated. Waterworks should report the PFAS sampling results using units of ng/L, as established by the PFAS Rule.

Other information and suggestions to improve the CCR

- Provide the required location information on drinking water source(s) in very general terms. Due to security concerns, avoid including a detailed map or verbal location description.
- Include the same (or updated) source water assessment information as in all previous CCRs, plus any additional source water assessment information given to you by your FO for new sources recently placed into service.
- Include the same mandatory language required in all previous CCRs addressing vulnerable populations and contaminants reasonably expected to be in drinking water.
- Consider including information about planned water system improvements or water quality issues customers have expressed concern about.
- Waterworks have the option of using the EPA's Web-based program, CCRiWriter, to prepare the CCR, or they may continue to use the existing formats of prior years, with updates. The CCRiWriter is available at: https://ofmpub.epa.gov/apex/safewater/f?p=140:LOGIN_DESKTOP