

DEPARTMENT OF HEALTH SERVICES

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February 7, 2000

TO: All Large Community Water Systems

SUBJECT: Consumer Confidence Reports for 1999 Water Quality Data

Under the Federal Safe Drinking Water Act, a high priority is placed on providing accurate and timely information to consumers on the quality of their drinking water. Hence, the U.S. Environmental Protection Agency (EPA) has adopted regulations requiring a Consumer Confidence Report (CCR). At the State level, the Department of Health Services (Department) is in the process of adopting the CCR requirements. The purpose of this letter is to:

- Provide you with information on the requirements of the new CCR
- Inform you of resources available to help you complete the CCR accurately and completely.
- Direct you to distribute the CCR and mail a copy to the Department by July 1, 2000
- Submit certification to the Department by October 1, 2000 that you have distributed your CCR and that it is correct (see sample form in the State CCR guidance mentioned below).

Although the Department is in the process of adopting the California CCR regulations, they will not be in effect by the 1999 report due date of July 1, 2000. Regardless, EPA has informed us that **the 1999 report must follow the CCR format**; please be sure that the report you issue meets all of the CCR requirements so that you will avoid the expense of having to reissue it and possible enforcement action by EPA or the Department.

The Department is in the process of adopting the draft State regulations. We expect that the draft State regulations will be proposed before July 2000. Since EPA has determined that the draft State requirements are in conformance with the Federal regulations, compliance with the State draft is equivalent to compliance with the Federal requirements. We have posted the draft State regulations on the Division of Drinking Water and Environmental Management (DDWEM) website for your information:
http://www.dhs.ca.gov/ps/ddwem/publications/Regulations/regulations_index.htm.

Utilities are expected to comply with the State's draft regulations and guidance is now available to help you do so: The Department has revised the Federal CCR guidance for water systems for consistency with both the draft State regulations and the Federal requirements and has made that guidance available on the DDWEM website above. If you follow the State guidance and draft State regulations, you can produce a CCR that is in conformance with both State statutory requirements related to the CCR and the Federal Rule.

As a procedural approach, the Department strongly recommends that you do not attempt to revise last year's report to conform to CCR requirements. The intent of the detailed format requirements in the CCR rule is that information on the drinking water source and the contaminants present in the drinking water served to consumers be provided simply, up front, and with a basic consistency among water utilities. After that information has been presented, utilities may follow with whatever else they wish, e.g., monitored chemicals not detected, special efforts on the part of the utility to safeguard the water, etc. You will save time and avoid errors by starting from scratch and following the guidance step by step. Attached is a checklist of CCR requirements for you to use; the guidance provides details on each.

If you are familiar with the Federal requirements, please note the differences between the Federal and draft State rules. Compared to the Federal regulations, the State requires:

- Both community and nontransient-noncommunity water systems to distribute CCRs (consistent with existing annual report requirements)
- Inclusion of public health goals (PHGs) in place of MCLGs for detected contaminants, unless no PHG has been adopted yet
- Modified language for definitions
- Additional definitions (PHG and primary drinking water standard)
- Modified language for contaminant sources and health effects
- Inclusion of secondary MCLs for any detected contaminants along with any detected levels for sodium and hardness
- Use of State MCLs only (EPA MCLs not required)
- For completed source water assessments, in addition to information on how to obtain a copy, both the completion date and a vulnerability summary written by the party conducting the assessment are required.

If you wish to order a hard copy of the guidance, contact the DDWEM headquarters office at 916/323-6111.

As mentioned earlier, **the 1999 data report must be distributed to the public by July 1, 2000.** If you have any questions about the CCR, please contact your district engineer.

Sincerely,



David P. Spath, Ph.D., P.E., Chief
Division of Drinking Water and
Environmental Management

Enclosure