

Date Signed: June 29, 1999

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MEMORANDUM

Subject: Consumer Confidence Report (CCR) Rule -- Units for Reporting Detected Contaminants

To: Water Division Directors  
Regions I - X

From: Cynthia Dougherty, Director  
Office of Ground Water and Drinking Water

I am writing to reaffirm our policy on reporting units for detected contaminants in Consumer Confidence Reports (CCRs). The CCR rule requires water systems to list detected contaminants and to show corresponding Maximum Contaminant Levels (MCLs) and the level detected. The MCL must be expressed as a number greater than or equal to one and the level detected must be expressed in the same units.

Some states contend that CCRs should be prepared with the units most commonly used by water systems. States argue that using these units would limit the effort required to prepare reports and minimize errors. However, we believe that the effort to convert units is well spent. Focus groups conducted independently by EPA and the American Water Works Association showed that the public finds numbers greater than one easier to understand and use as a basis for comparing with detected levels. I believe that templates produced by EPA and other organizations that automatically convert data will make reporting in numbers greater than one less difficult for water systems.

At the Association of State Drinking Water Administrators (ASDWA) Winter Meeting, I was asked about the type of information and research that would be required before EPA would approve a CCR Rule primacy revision application that allowed MCL reporting in other than whole numbers. I responded that I would consider approval of such an application upon a good faith state effort showing the proposed reporting format is favored by the State's public over using numbers greater than or equal to one. I believe that there should be a high bar for public involvement for changing the reporting format for detected contaminants. Public involvement should include documented focus group research. This research should target members of communities served. Representatives from water systems and other drinking water professionals can be involved in the research, but they should not be considered the target audience. If the process shows that consumers find an alternative MCL format easier to understand, I would consider approving a State primacy revision application including that format. Thus far no State has tried to make this demonstration.

I strongly recommend that States include their EPA region and a wide range of stakeholders in developing any focus group methodology. If a State intends to change the MCL presentation format, I recommend that the State submit a draft primacy revision application documenting the methodology and the focus group research and explaining the proposed changes.

All focus group research conducted to date that we are aware of shows that numbers greater than or equal to one for presentation of MCLs are easiest for consumers to understand. Please call me with any questions or comments at (202)-260-5543 or have your staff call Kathy Williams at (202)-260-2589.

cc: CCR Implementation Workgroup  
Vanessa Leiby, ASDWA