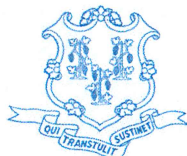


STATE OF CONNECTICUT

DEPARTMENT OF PUBLIC HEALTH


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DWS Circular Letter #2014-07

To: Small Public Water Systems Serving Less than 1000 persons that are testing under the Unregulated Contaminant Monitoring Rule (UCMR3)


From:  Lori Mathieu, Public Health Section Chief (Drinking Water Section)

Date: May 8, 2014

Subject: Reporting & Notification of the UCMR3 Results

The purpose of this letter is to reiterate the Consumer Confidence Report (CCR) and Public Notification (PN) requirements associated with public water system (PWS) monitoring under the current Unregulated Contaminant Monitoring Rule (UCMR3), and to offer suggested language for communicating UCMR3 results to the public.

The CCR rule, published on August 19, 1998 (63 FR 44511), requires community water systems (CWSs) to report unregulated contaminant monitoring results whenever they are detected (i.e., are reported above the minimum reporting level [MRL]). The CCR rule does not apply to non-community water systems. A CWS should briefly explain in the CCR why it is monitoring for unregulated contaminants. A suggested explanation follows:

 *Unregulated contaminants are those that don't yet have a drinking water standard set by USEPA. The purpose of monitoring for these contaminants is to help USEPA decide whether the contaminants should have a standard.*

Those who wish to provide additional information to their customers may refer them to the UCMR3 Data Summary (available at <http://water.epa.gov/lawsregs/rulesregs/sdwa/ucmr/data.cfm#ucmr2013>). The Data Summary includes health-based "reference concentrations" (along with explanatory discussion) for many of the UCMR3 contaminants. The reference concentrations were developed to provide context around the detection of particular UCMR contaminants.

PWSs may also wish to consider the American Water Works Association (AWWA) Fact Sheets (available at <http://www.drinktap.org/home/water-information/water-quality/ucmr3.aspx>) as an additional source of information for many of the UCMR3 contaminants.

More information on preparing and meeting CCR requirements may be found at <http://water.epa.gov/lawsregs/rulesregs/sdwa/ccr/index.cfm>.



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The Public Notification (PN) rule was published on May 4, 2000 (65 FR 25981). This regulation applies to the CWSs; non-transient, non-community water systems (NTNCWSs); and small “transient, non-community” water systems (TNCWSs) participating in UCMR3. In addition to requiring notification of violations, the PN rule requires PWSs to provide special notices for certain situations, including the availability of unregulated contaminant monitoring data (40 CFR 141.207). Special public notices of unregulated contaminant monitoring data are different from other public notices because they do not have to contain all the elements required of other types of public notices. Instead, systems need only report that the results are available, and provide a phone number or contact where the results can be obtained.

EPA's *Revised Public Notification Handbook* for CWSs and NTNCWSs (EPA 816-R-09-013) and *Public Notification Handbook for Transient Non-community Water Systems* (EPA 816-R-09-009) provide useful information for water system operators on how to write and distribute effective public notices. The Handbooks and other information regarding the PN rule are available at <http://water.epa.gov/lawsregs/rulesregs/sdwa/publicnotification/compliancehelp.cfm>.

As you know, EPA is responsible for the analysis of UCMR3 samples from small PWSs and for the development, review, and distribution of monitoring results. Based on the lag time between sample collection and laboratory reporting of analytical results, the time required for EPA’s quality control review of the results, and the time required to develop and distribute UCMR3 reports to small systems, many small PWSs that had UCMR3 samples collected in 2013 have not yet received their monitoring results. Though EPA’s Technical Support Center is working diligently to develop, review, and distribute those reports, it is clear that some CWSs will not receive results from UCMR3 sampling conducted in 2013 before their 2014 CCR is to be distributed.

With respect to UCMR3, EPA’s view is that the CCR for a given year (due by July 1 of that year) is to report UCMR3 detections (i.e., results above minimum reporting limits) based on results received by the PWS during the previous calendar year. For example, a CWS’s 2014 CCR would include UCMR3 results received during 2013. If a small CWS does not receive its UCMR3 monitoring report from EPA until 2014, EPA’s view is that those results do not need to be included in the CCR until 2015 (even if the sample was collected during 2013).

Should you have any questions concerning this letter, please do not hesitate to contact Sachin Patel of my staff at 860-509-7333.

CC: Local Directors of Health
Ellen Blaschinski, Branch Chief – DPH Regulatory Services