



May 22, 2023

Dr. Jennifer L. McLain  
Director  
Office of Ground Water and Drinking Water  
U.S. Environmental Protection Agency

*Submitted electronically*

**Re: Docket ID EPA-HQ-OW-2022-0260, Consumer Confidence Report Rule Revision**

Dear Dr. McLain:

The Association of Metropolitan Water Agencies (AMWA) is pleased to have the opportunity to provide comments on EPA's proposed revisions to the Consumer Confidence Report (CCR) rule. AMWA is an organization of the largest publicly owned drinking water systems in the United States. Members serve over 100,000 customers and collectively provide clean drinking water to over 160 million people. The association supports the CCR rule and recognizes its importance as a tool to communicate the quality of customers' drinking water, connect consumers with their community water system (CWS), and raise consumers' awareness of their drinking water sources. AMWA member utilities have long been at the forefront of communications and community engagement, and they have implemented leading practices in using the CCR to communicate drinking water quality and more with their customers. While AMWA appreciates EPA's efforts to modernize the CCR and expand its impact as a communications tool, we have several concerns and suggestions to improve the components of the proposal:

1. AMWA urges EPA to consider Congress' intent under America's Water Infrastructure Act of 2018 (AWIA) and limit unnecessary burdens on CWSs, particularly regarding the frequency of CCRs and other requirements EPA's proposal states will improve readability, clarity, and understandability.
2. Regarding delivery provisions in the CCR Rule proposed revisions, AMWA believes the final rule should give community water systems as much flexibility as possible to adapt their CCRs to take advantage of advancing technologies for delivery and electronic CCR presentation.

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3. Regarding improvements to readability, clarity, and understandability, AMWA requests EPA further clarify the responsibilities of CWSs and primacy agencies as well as provide as much up-front translation as is feasible.
4. Provisions EPA declares will improve accuracy and risk communication, including provisions prohibiting “false and misleading statements” require reconsideration and further clarification in the final rule.
5. AMWA urges EPA to develop a separate rulemaking process to address the Compliance Monitoring Data provisions in the CCR revisions proposal.

Additionally, to best assist CWSs, primacy agencies, and consumers, AMWA requests EPA take the following actions in conjunction with the release of the final CCR revisions rule:

- EPA should develop clear guidance and tools with consultation of CCR stakeholders clearly explaining changes to the rule and responsibilities of each stakeholder.
- EPA should produce translations of all report elements required under the CCR rule, including statements CWSs can but are not required to alter, in languages other than English, to provide to primacy agencies and community water systems.
- EPA should consult with other federal agencies and experts to produce guidance and resources for customizing CCRs for customers requiring assistance (e.g., guidance for producing reports that can be read by screen-readers).

AMWA thanks EPA for consideration of our comments, which address our concerns and suggestions by section of the proposed rule and are available below. If you have any questions about these comments, please contact Jessica Evans, AMWA’s Manager of Government Affairs and Sustainability Policy, at [evans@amwa.net](mailto:evans@amwa.net) or Brian Redder, AMWA’s Manager of Regulatory and Scientific Affairs, at [redder@amwa.net](mailto:redder@amwa.net).

Sincerely,



Thomas Dobbins  
Chief Executive Officer

cc: Sarah Bradbury, OGWDW  
Michael Plastino, OGWDW

## **AMWA responses to report delivery**

### ***Biannual delivery***

AMWA believes that the proposed revisions to the CCR rule requiring water systems serving more than 10,000 customers to potentially provide two different CCRs to customers over a calendar year goes beyond the requirement of AWIA, conflicts with the congressional intent behind the law, and contradicts the overriding objective of improving clarity and understandability for customers. To minimize customer confusion and regulatory burdens, AMWA suggests that the final rule explicitly state that any additional water quality or violation information can appear on an addendum or appendix to the second copy of a CCR sent to customers during the calendar year. AMWA also suggests EPA carefully consider and address the potential confusion from different sampling periods potentially being shared with customers on biannual CCRs.

AWIA amended section 1414 of the Safe Drinking Water Act to require community water systems serving more than 10,000 people to “provide ... a consumer confidence report to each customer of the system at least biannually.”<sup>1</sup> The proposed rule would require all community water systems to transmit a CCR to all customers by July 1, consistent with current requirements. This report would include information on water quality data and violations during the totality of the previous calendar year. Additionally, consistent with section 1414(c)(4)(F)(i)(II), community water systems serving 10,000 or more people would have to distribute a second CCR by December 31 of each year. This second CCR could mirror the first unless one of the following conditions were met:

- The water system obtains Unregulated Contaminant Monitoring Rule (UCMR) data from the year covered by the CCR, but which was not included in the CCR distributed to customers by July 1; or
- The water system incurs a Safe Drinking Water Act violation or action level exceedance between January 1 and June 30 of the *current calendar year* (i.e., the six-month period immediately *following* the year covered by the CCR).

AMWA believes the biannual delivery requirements in the proposal have the potential to make CCRs more confusing to customers while significantly increasing burdens on all drinking water systems serving 10,000 or more people. CCRs have always provided information for the single full calendar year preceding the issuance of the report, and this proposed rule would put this association to an end. In the case of roughly 4,500 community water systems serving populations of 10,000 or more, the proposed rule mandates that the July 1 CCR will continue to cover water quality data collected during the previous calendar year. Meanwhile, the second CCR required to

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<sup>1</sup> America’s Water Infrastructure Act of 2018. P.L. 115-270., 132 Stat., 3765. (2018).  
<https://www.congress.gov/115/plaws/publ270/PLAW-115publ270.pdf>.

be sent by December 31 will also be associated with the previous calendar year, unless the community water system incurs a violation or action level exceedance during the first six months of the year following the calendar year covered by that CCR. In that case, the December 31 report will include water quality information from the previous year, alongside a report of a violation or action level exceedance during the first six months of the current year, and data documenting that violation or exceedance.

AMWA is concerned that conflating information from two different years in the report required by December 31 CCR could confuse customers by decoupling the CCR's association with data collected during a single calendar year. Especially in the case of Tier I or Tier II violations occurring during the first six months of the calendar year, customers would have previously received notice of those events within 24 hours or 30 days, respectively, pursuant to the Public Notification Rule.<sup>2</sup> Adding information about those events to the December 31 CCR, therefore, will not provide customers with any information they did not have previously.

AMWA recommends that the final rule give community water systems the option of providing a Tier III notice as an addendum or appendix to a CCR required by December 31. In the case of a Tier III violation occurring during the first six months of the calendar year following the year covered by the CCR, the December 31 CCR could represent an opportunity to provide that notice to customers for the first time. This is because the Public Notification Rule requires notice of Tier III events within 12 months.<sup>2</sup> However, EPA should weigh the benefits of requiring utilities to provide this information in the December 31 CCR, against the potential customer confusion that may arise related to disassociating the CCR with a single calendar year. AMWA, therefore, recommends EPA allow CWSs to provide Tier III notifications as an optional addendum to the second CCR of a calendar year.

AMWA has further concerns about the potential confusion caused by Unregulated Contaminant Monitoring Rule data triggering new CCRs and emphasizes that an appendix to a second report would be the clearest solution. AMWA understands that the proposal would require a community water system to issue an updated CCR by December 31 if a community water system receives UCMR data for the year covered by the report (i.e., the previous calendar year) that was not included in the July 1 report. It is unclear how often this scenario occurs, but it has the potential to cause inconsistencies in the timing of delivery of biannual reports.

In sum, AMWA is concerned that the proposed rule would lead to irregular, unpredictable, and redundant distribution of CCRs to the customers of water systems serving 10,000 or more people. As proposed by EPA, in some years these customers would receive copies of the same CCR six months apart, while in other years, customers could receive a second CCR with additional information from monitoring in a different calendar year. In effect, under the proposal any violation or action level exceedance that occurs during the first six months of any year would

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<sup>2</sup> US Environmental Protection Agency (USEPA). 2000. Public Notification Rule. Federal Register, 67 (87) (May 4, 2000), p. 25982. <https://www.govinfo.gov/content/pkg/FR-2000-05-04/pdf/00-9534.pdf>.

be reported to customers in two different CCRs, spaced six months apart, while violations or action level exceedances that occur during the second half of a year would only be reported in a single CCR. Additional information about violations or action level exceedances incurred during the first six months of the year after the year otherwise covered by the report, would then be re-sent to customers in the subsequent July 1 CCR, potentially introducing more confusion about the quality of drinking water. These notifications will all come in addition to the normal reporting of violations and exceedances required by the Public Notification Rule.<sup>2</sup>

Furthermore, AMWA believes the totality of these requirements appears to contradict the intent of Congress in amending section 1414 to direct EPA to revise the CCR rule in a manner that reduces burdens on community water systems. The preamble to EPA's proposed rule references House Report No. 115-380<sup>3</sup> which was submitted by the House Energy and Commerce Committee to accompany H.R. 3387, the Drinking Water System Improvement Act of 2017. Portions of this legislation eventually were enacted as part of America's Water Infrastructure Act of 2018, including the bill's revisions to the CCR Rule. House Report No. 115-380, therefore, provides strong insight into the intent behind the revisions. While EPA's preamble quotes one line from that report ("not all persons have access to or are comfortable using these means and [intend] that this new option not be used as an opportunity to avoid making paper copies available to those customers that want them"),<sup>3</sup> it ignores this sentence:

"The Committee expects that when issuing these regulations, EPA will include feasible implementation options that reduce the burden on community water systems, States, and other relevant parties subject to the new requirements while maintaining the quality and availability of information for community water system customers."<sup>3</sup>

Congress, therefore, provided clear direction to EPA to use the revisions to the CCR rule to *reduce* the burden on community water systems – not merely avoid or minimize the addition of new burdens. As a result, AMWA believes that the final rule should strive to ensure customers are able to easily access CCRs while avoiding new mandates on water systems that will place an increased burden or constraint on CWSs. Requiring community water systems to publish two distinct CCRs containing different information within six months of each other would clearly increase burdens on water systems; AMWA appreciates that the EPA proposal as written can potentially avoid this. To achieve that goal, AMWA urges EPA to meet the requirements of the law by clearly stating in the final rule and accompanying guidance that water systems can provide the same CCR twice annually following the year covered by the report with any potential water quality or violation information added as an addendum to the same CCR sent earlier in the year. This approach will provide consistent information and reduce the burden on CWSs to develop distinct and different CCRs twice annually.

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<sup>3</sup> <https://www.congress.gov/congressional-report/115th-congress/house-report/380/1>

*Additional considerations for bi-annual delivery*

AMWA is also concerned about the interactions the proposed National Primary Drinking Water Regulation (NPDWR) for six per- and polyfluoroalkyl (PFAS), and delays in PFAS sample results, may have on bi-annual delivery of the CCR. With continued and worsened delays in receiving PFAS sampling results, utilities may have issues receiving PFAS sample results in time for the July 1 deadline. Alternatively, utilities that typically finalize reports in February or March before a quarterly billing cycle may have to wait to receive PFAS sample results, delaying their CCR delivery to the second quarterly billing statement. The alternative would be to spend additional resources sending out the CCR separately from quarterly billing, which is neither efficient nor cost-effective.

***AMWA responses to specific questions posed in the proposal regarding delivery frequency***

*Should EPA require water systems to deliver the first report sooner in the year, for example by April 1st and deliver the second report by October 1st of each year, and why or why not?*

AMWA believes that the delivery deadline for the first report should remain on July 1, consistent with the proposed rule and current regulations. If the delivery deadline were advanced to April 1, some water systems may be challenged in developing and distributing the initial report, especially in the case of consecutive systems that must first obtain and input data from their water wholesalers.

*Should the deadline to deliver the second report be 3 months or 6 months after delivering the first report, or some other length of time?*

The deadline for delivery of the year's second CCR should be December 31, or approximately six months after the deadline for delivering the first CCR. These regular six-month intervals will preserve some sense of predictability for water systems and their customers and are preferable to the alternative of mandating delivery of the second report just three months after the publication of the first report. Under this unbalanced scenario, there would be alternating periods of three and nine months between when customers receive CCRs, an irregular schedule that could further increase customer confusion.

*Should EPA require that each report cover the previous 6 months, rather than provide an annual summary and why or why not?*

AMWA does not support a requirement for community water systems to produce a new CCR every six months. This would impose a significant burden on water systems while providing minimal new and useful information to customers.

For example, if EPA were to require two completely new CCRs per calendar year (one covering the January-June and the other carrying data from July-December), customers would have to

track which reported information is from monitoring data in the year covered by the report and which is from the current calendar year. Based on the current timelines, the CCR that a customer receives in July would convey water quality information that was collected during the previous July-December period. Subsequently, the next CCR (due the following January) would include water quality data collected from the previous January through June. This would mean that the data sent out to customers would always be between 6 and 12 months old, would not be clearly associated with a single calendar year, and in some – but not all – cases, repeat the same test results that were already reported in the previous 6-month CCR.

In other words, rather than providing a one-year overview, 6-month CCRs would send customers new reports more frequently, but only with some of the included information updated from the previous report. Expecting recipients to accurately keep track of which information is updated and which is not would contradict the proposal's goal of making CCRs clearer and more understandable to the public.

### *Electronic Delivery*

AMWA believes the final rule should give community water systems as much flexibility as possible to adapt their CCRs to take advantage of advancing technologies for both electronic delivery and electronic CCR presentation. Clarification on additional electronic delivery options is necessary to allow utilities to utilize potential future direct delivery options, and additional clarity on electronic copies of CCRs is needed to maximize the capabilities of digital presentation of CCR information.

AMWA is concerned that as written, the CCR revisions rule unnecessarily omits potential direct electronic delivery options. America's Water Infrastructure Act of 2018 (P.L. 115-270) amended the Safe Drinking Water Act to codify the ability of community water systems to deliver CCRs to customers via electronic means.<sup>1</sup> Specifically, as amended by the statute, section 1414(c)(4)(F)(ii) specifies that EPA's revisions to the CCR rule "shall allow delivery of consumer confidence reports by methods described in the memorandum 'Safe Drinking Water Act-Consumer Confidence Report Rule Delivery Options' issued ... on January 3, 2013."<sup>4</sup> This includes the method "electronic CCR delivery with a customer option to request a paper CCR." AMWA agrees that the proposed rule appropriately considers this to be a permissible method of directly delivering CCRs to customers.

More specifically, section 141.155(a)(1) of the proposed rule directs community water systems to use "one of the following forms of delivery" to transmit CCRs to customers. These include both physical and electronic options:

- Mail a paper copy of the report;
- Mail a notification that the report is available on a website via a direct link; or

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<sup>4</sup> <https://www.epa.gov/sites/default/files/2015-12/documents/ccrdeliveryoptionsmemo.pdf>

- Email a direct link or electronic version of the report.

While each of these forms of delivery is reflected in the attachment to EPA's 2013 memorandum, the proposed rule omits another delivery option also deemed acceptable by EPA in that attachment: "additional electronic delivery that meets 'otherwise directly deliver' requirement." In a footnote to the attachment to the 2013 memorandum, EPA explained that the category "is intended to encompass methods or technologies not included" in the other stated options.

AMWA encourages EPA to add a fourth category, "additional electronic delivery that meets 'otherwise directly deliver' requirement," into the final rule with the stipulation that CWSs and primacy agencies considering new methods or technologies should consult with EPA to ensure it meets the intent of otherwise directly deliver. Two of the three delivery options specifically allowed by the proposed rule involve sending physical documents through the U.S. Mail, while the third option allows complete electronic delivery, which requires a community water system to send a link or electronic version of a CCR to a customer only via "email." This could be limiting in the future if a common electronic delivery option emerges that does not involve email, such as a service that provides bills and other information to customers via apps or electronic push notifications. While customers would presumably have to link these accounts to an email address, the actual transmission of information may not involve an email – thereby preventing its use to electronically deliver CCRs under the proposal. AMWA believes the final rule should explicitly allow other, as-yet-unspecified electronic means that EPA determines meet the "otherwise directly deliver" requirement.

Furthermore, many AMWA members currently utilize electronic CCR delivery by printing or including a direct link to their CCR on a utility bill sent to customers. While that approach appears to remain permissible under the proposed rule (because it involves mailing or emailing a direct link), AMWA requests this point be clarified in the final rule. AMWA, therefore, requests that the final rule, or accompanying guidance, specifically recognize that including links to a CCR on a water bill transmitted to customers is an acceptable form of electronic delivery.

AMWA also believes the CCR revisions final rule is an opportunity to clarify the digital presentation of electronic CCRs. Many CWSs interpret that because they are required to provide a print copy for any customer requiring a hard-copy report, they are not permitted to present a dynamic or interactive electronic report. Instead, many CWSs make reports that are static to ensure they can create printed versions of the same report. AMWA encourages EPA to take the opportunity in the final rulemaking to allow utilities to utilize innovative data presentation and web capabilities for electronic CCR presentation.



### ***Good faith delivery***

AMWA appreciates EPA's addition of good faith delivery efforts and believes EPA's approach of not mandating requirements for delivery to non-bill-paying customers is appropriate. Many CWSs have worked to improve the effectiveness of CCR content and delivery in communities, particularly to non-bill-paying customers. For example, many reach out to local libraries, schools, and other federal and state offices to provide hard copies of reports for individuals. AMWA members specifically have also created mass communication system subscription services, reached out to post offices, employed social media, and used a variety of other techniques that help them reach a wider audience than just single bill payers. It makes sense that efforts to reach the community be at the discretion of the utility and its partners to customize delivery in a way that works for their customers. A uniform requirement for delivery to ensure non-bill-paying customers receive the report would put unnecessary burdens on those who already have a system in place.

### **AMWA responses to improving readability, clarity, and understandability**

#### ***Report summary***

While AMWA is pleased EPA's proposal takes steps to better align with best communication practices, AMWA strongly urges EPA to consider that the misleading statements section of this proposal, discussed later in this comment letter, constrain utilities from producing effective summary statements. AMWA recognizes the report summary requirement helps CCRs better align with established public health communication guidelines, such as those outlined in the Centers for Disease Control and Prevention (CDC) [Clear Communication Index \(CCI\)](#)<sup>5</sup>, which encourages the use of a main message and call to action in public health communications. However, CWSs may face difficulty creating an effective summary statement if they are uncertain about what types of statements are considered false or misleading and therefore requests EPA revisit this section of the proposal in the final rule. AMWA also encourages EPA to further consider how to improve the CCR by examining how EPA's required elements and language of the CCR measure up according to the CCI and readability measures, like Flesh-Kincaid<sup>6</sup>, which assign U.S.-grade reading levels using measures of word and sentence length to assess a passage's reading difficulty.

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<sup>5</sup> CDC, 2014. CDC Clear Communication Index. Retrieved from: <https://www.cdc.gov/ccindex/pdf/clear-communication-user-guide.pdf>

<sup>6</sup> Kincaid, J.P., Fishburne, R.P., Rogers, R.L., & Chissom, B.S. (1975). Derivation of new readability formulas (automated readability index, fog count, and flesch reading ease formula) for Navy enlisted personnel. Research Branch Report 8-75. Chief of Naval Technical Training: Naval Air Station Memphis.

***Translation support for limited English proficient (LEP) persons and accessibility considerations***

AMWA asks EPA to provide further information on the responsibilities of CWSs versus their primacy agencies in assisting LEP customers and to clearly define what elements CWSs serving greater than 100,00 customers must address in their plans for LEP customers to meaningfully access CCRs. While AMWA is committed to ensuring all customers have access to CCRs, AMWA is concerned about the potential burden imposed on primacy agencies or utilities by this provision. AMWA urges EPA to clarify these responsibilities and plan requirements.

AMWA members work hard to ensure information is readily available to customers, which includes translation of CCRs into other languages. CWSs with large populations of non-English speaking residents, as determined by the primacy agency, must already supply information in the appropriate language that highlights the importance of the information, or provide information on where a resident can find a translated copy or assistance. It is important that residents have access to the important information provided in these reports, and AMWA is committed to making them clear, readable, and accessible to customers.

Translation services can be a large expense for utilities, especially since some reports can exceed 50 pages. To minimize burdens on CWSs while still making reports accessible, EPA again should explicitly state that utilities only have to create one CCR annually that is sent out at least every six months with an addendum for any notice of violations or new UCMR data from the calendar year covered by the report. This would save utilities from having to have an entirely new report translated twice a year. This is especially important for utilities that contain several populations of non-English speaking customers who have the report translated into multiple languages.

**AMWA response to improving accuracy and risk communication**

***Misleading statements***

Revisions that EPA declares will improve accuracy and risk communication, including provisions prohibiting “false and misleading statements” require reconsideration and further clarification in the final rule. AMWA asks EPA to further define what information could be misleading or false and eliminate the example given in the proposed revisions in the final rule, as it has the potential to discourage utilities from providing additional information or useful summary information.

AMWA has considerable concerns about the specific example in the proposed rule stating CWSs writing, “the water is ‘safe’ may not accurately reflect the safety of the water for sensitive populations.” AMWA urges EPA to eliminate the example from the final rule and any related guidance as the statement ignores required language in the CCR rule, does not align with other federal public health communication standards, and may erode public trust in the long-term.

First, this statement ignores the CCR's required safety disclaimer, which states:

“Some people may be more vulnerable to contaminants in drinking water than the general population. Immuno-compromised persons such as person with cancer undergoing chemotherapy, persons who have undergone organ transplants, people with HIV/AIDS or other immune system disorders, some elderly and infants can be particularly at risk from infections. These people should seek advice about drinking water from their health care providers. EPA/CDC guidelines on appropriate means to lessen the risk of infection by *Cryptosporidium* and other microbial contaminants are available from the Safe Drinking Water Hotline (800-426-4791).”<sup>7</sup>

This safety disclaimer is sufficient to indicate that vulnerable populations should consult with a trusted healthcare provider and does not interfere with the summary information the remainder of the population may be looking for.

Furthermore, other federal public health agencies do not treat the word “safe” as meaning, “free of all risk,” a definition this CCR rule revisions implicitly follows. Free of all risk is also not the common understanding of the word safe, nor is it consistent with products and guidance other government agencies, including the CDC, use.<sup>8</sup>

AMWA believes the most worrisome aspect of the example excluding the use of the word safe to describe drinking water quality is its potential to erode public trust. In the long-term, customers may believe their tap water is unsafe if the EPA bans utilities from saying it is. This may lead to unnecessary worry and confusion for customers of utilities that meet all NPDWR standards.

Finally, this provision in the report may discourage CWSs from including extra information in their CCRs, such as updates on capital projects and construction, sustainability measures, or other important utility developments if any information in it could later be considered false or misleading. AMWA asks EPA to further develop guidance and clear examples on what statements can be considered false or misleading before finalizing this rulemaking.

### **AMWA response to compliance monitoring data provisions**

AMWA requests EPA separate Compliance Monitoring Data provisions into a different rulemaking process. In the proposed rulemaking, EPA included a provision requiring state primacy agencies to submit compliance monitoring data (CMD) to EPA. AMWA believes the compliance monitoring data provision should be a separate rulemaking for two reasons; many stakeholders interested in CMD may not be engaged with the consumer confidence report and could miss the

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<sup>7</sup> EPA. (2005). 63 FR 44526. Consumer Confidence Report Regulations.

[https://www.epa.gov/sites/default/files/2014-05/documents/regulations\\_changesto\\_july12005.pdf](https://www.epa.gov/sites/default/files/2014-05/documents/regulations_changesto_july12005.pdf)

<sup>8</sup> CDC. (2023). Consumer confidence

reports. [https://www.cdc.gov/healthywater/drinking/public/understanding\\_ccr.html](https://www.cdc.gov/healthywater/drinking/public/understanding_ccr.html)

opportunity to engage with this proposed rule as presented, and not enough details are contained in the current EPA rulemaking, rationale, and analysis to allow for meaningful engagement.

The EPA collection, analysis, and reporting of CMD is substantial and requires its own advertisement and analysis in a separate rulemaking. As the collection of CMD does not relate to the Consumer Confidence Rule Revisions, many stakeholders affected by the details of such a proposal may not be fully engaged with the CCR revisions proposal, jeopardizing the opportunity for genuine public input. Additionally, the details outlining CMD provisions are not fully explored; therefore, AMWA asks EPA to produce a more robust, separate rulemaking for the CMD provisions in the CCR revisions proposal.

## **Conclusions**

In summary, AMWA recommends that EPA follows Congress' intent under America's Water Infrastructure Act of 2018 (AWIA) when finalizing the CCR revisions and limits unnecessary burdens on CWSs, while also preserving the abilities of CWSs to provide nuanced information in innovative ways. To allow for full consideration of the compliance monitoring data provisions, AMWA asks EPA to develop and implement a distinct rulemaking process on these proposed requirements. AMWA encourages EPA to allow CWSs as much flexibility as is feasible to deliver and present CCR information electronically and strongly encourages EPA to reconsider and redevelop prohibitions on "false and misleading statements" in the final rule. In addressing issues of access to CCRs, AMWA encourages EPA to provide CWSs and primacy agencies with as much proactive support as possible by developing translations and assistance materials and guidance and clarifying responsibilities between primacy agencies and utilities. Finally, AMWA appreciates EPA's efforts to help clarify nuanced information in CCRs but asks EPA to recognize these requirements should not prevent or discourage utilities from providing consumers with important, helpful summaries of complex information.