

**Vermont Department of Environmental Conservation***Agency of Natural Resources***Drinking Water and Groundwater Protection Division**

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<http://dec.vermont.gov/water>

March 09, 2023

JOSH ARNESON

PO BOX 285  
RICHMOND, VT 05477

Re: 2022 Consumer Confidence Report for RICHMOND WATER DEPT - VT0005084

Dear JOSH ARNESON:

It's that time of year again! All Public Community Water Systems are required to provide Consumer Confidence Reports (CCRs) to their customers by **July 1, 2023**.

The EPA requires **Wholesalers** to provide information contained in their CCR to corresponding Consecutive System(s) by **April 1st** annually.

The enclosed template is designed to help Public Community Water Systems create an individual CCR for Calendar Year 2022. Please read it carefully as **there are sections that must be completed and accuracy of information verified by the Water System**. A CCR that is incomplete or reports incorrect information may result in the need to issue an addendum and the Water System may also incur a reporting violation. Once the template has been completed and all information contained in the report validated, distribute the CCR to all customers (via direct delivery and "good faith efforts"), no later than **July 1, 2023**.

The Environmental Protection Agency (EPA) requires all the data, and nearly all of the information provided in the template, to be included in the CCR. CCR's may be reconstructed to include a summary promoting confidence in the use of the drinking water that is provided, good news items, or additional local information. The CCR is an excellent tool for promoting water efficiency and conservation as well as to convey recent water system information such as the hiring of new employees, noting employee accomplishments, recent water system improvements, rate information, or explaining the need for updated treatment facilities.

### CCR Distribution Methods:

#### I. Direct Delivery Options to Reach All Customers - **at least** one option must be used:

- 1. Mail - paper copy (traditional method).** Water System mails a paper copy of the CCR to each bill-paying customer.
- 2. Hand Delivery.** Water System directly delivers a copy of the CCR to all accessible customers.
- 3. Electronic Delivery. (see examples #4 through #6 below)**

Three elements must be met in order to use electronic delivery to comply with the requirement to "directly deliver" the CCR. Electronic delivery may be used in conjunction with other delivery methods.

- a) Electronic delivery must provide the CCR in a manner that is "direct." Paper or electronic communication (e.g., email, a water bill, post card notification) which lists a specific URL which provides a **direct** link to the CCR. The link **must** take the consumer to the entire CCR, so the consumer does not have to navigate to another webpage to find any CCR content.
- b) If a customer is unable to receive a CCR by the chosen electronic method, the CCR must be provided by an alternative method allowed by the rule.
- c) If using an electronic delivery, a prominently displayed message and the direct URL must be included in ALL notifications of CCR availability.

Examples of compliant electronic delivery methods are as follows:

4. **Email or Mail a notification which includes a direct URL to CCR.** Water System emails or mails to each bill-paying customer a notification that the CCR is available and provides the **direct URL** to the CCR on a publicly available site on the Internet.
  - A URL that navigates to a webpage which requires a customer to search for the CCR or enter other information does **not** meet the “directly delivery” requirement.
5. **Email - CCR as an attachment.** Water System emails the CCR as email attachment (e.g., portable document format (PDF)).
6. **Email - CCR embedded in the email.** Water System emails the CCR text and tables inserted into the body of an email (not as an attachment).

## II. “Good Faith Efforts” Delivery Options to Reach Non-Bill Paying Customers:

In addition to distributing the CCR to bill-paying customers, Public Community Water Systems must make “good faith” efforts to reach all customers beyond mailing to billing addresses of the water system. Students, renters, and workers are examples of the kinds of customers who must be reached by the “good faith” efforts.

1. Posting a direct link to the Public Community Water System’s CCR on the system’s or municipality’s website.
2. Advertising availability of CCR in news media.
3. Posting CCR in public places, e.g., libraries, schools or post offices.
4. Delivering multiple copies for distribution by a single bill-paying customer such as apartment buildings or large private employers.
5. Hand-Delivering to renters and/or workers.
6. Delivering the CCR to community organizations.

**Consecutive Systems:** Consecutive Systems must ensure that the Wholesaler’s CCR is distributed to the Consecutive System’s users **in addition to** the Consecutive System’s CCR. Wholesalers are not responsible for providing data on contaminants that Consecutive Systems must monitor (coliform, lead and copper, and DBPs) unless there is a prior written agreement between the Wholesaler and Consecutive System that specifies that the Wholesaler will include the Consecutive System’s information.

**All Water Systems** must keep a copy of the CCR on file for a minimum of three (3) years.

***After the CCR has been completed and distributed to all users, Water Systems must submit a copy of the CCR and completed Certificate of Delivery (enclosed) to the Drinking Water and Groundwater Protection Division no later than July 1, 2023.***

Submittal options include:

- Email - Jeff.Girard@vermont.gov
- Fax - 802-828-1541
- Mail - Montpelier address listed in the box at the bottom left of the **Certificate of Delivery**.

If you have any questions, wish to receive an electronic copy of the template, or need assistance in preparing your CCR, please contact me at Jeff.Girard@vermont.gov.

Sincerely,

Jeff Girard

Compliance Analyst, Drinking Water and Ground Water Protection Division

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