
PUBLIC NOTIFICATION GUIDANCE

Why are drinking advisories issued?

Water systems and state or local agencies issue drinking water advisories when they believe water quality is or may be compromised. Advisories tell individuals, schools, hospitals, businesses, and others about the situation and how to take immediate action.

Drinking water advisories:

- **Provide information** – An advisory may be issued when consumers need to receive important information but do not need to take any action. For example, a water system may issue an advisory to inform households about seasonal changes in water taste.
- **Encourage preparedness** – Advisories may help customers prepare for planned disruption in service or anticipated water quality threats. These advisories may affect a small area; such as, during distribution system construction or repair. Or, they can urge customers to prepare for an event, such as an oncoming hurricane. This type of advisory alerts people to watch or listen for more information.
- **Recommend action** – Advisories may give customers advice to take specific actions, such as boil water or use bottled water. These advisories may be issued as a precaution or in response to a waterborne disease outbreak.
- **Meet public notification requirements** – Advisories are required by the Safe Drinking Water Act (SDWA) when specific circumstances exist. The SDWA requires communication with customers when the water system does not comply with a regulation.

The U.S. EPA published revised public notification guidance in March of 2010. The purpose of this guidance (also known as “the Handbook”) is to explain the U.S. EPA’s Public Notification (PN) Rule and provide examples of effective public notices. This handbook is designed to meet the needs of public water systems (PWSs) of all sizes, including suggestions and instructions targeted to very small community systems (serving 500 people or fewer).

Suggestions, along with other useful hints for creating effective notices for all systems, are set aside in boxes throughout the guidance. Public notification helps to ensure that consumers always know if there is a problem with their drinking water. These notices immediately alert consumers if there is a serious problem with their drinking water (e.g., a boil water or do not drink emergency). For less serious problems (e.g., a missed water test), water suppliers must notify consumers in a timely manner.

Tier 1 (Immediate Notice, Within 24 Hours)

Notice as soon as practical or within 24 hours via radio, TV, hand delivery, posting in conspicuous locations throughout the area served, or other method specified by PWSB. Water suppliers must also initiate consultation with the PWSB within 24 hours. Violations that require Tier 1 notices include:

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1. Total coliform MCL violations where fecal coliform or E. coli are present, or failure to test for fecal coliform or E. coli when any repeat sample tests positive for coliform (sometimes referred to as an acute violation of the Total Coliform Rule).
 2. Nitrate, nitrite, or total nitrate and nitrite MCL violations, or failure to take a confirmation sample for nitrate or nitrite within 24 hours after learning that an initial sample exceeded the MCL.
 3. Exceedance of the nitrate MCL by non-community water systems that have been granted permission to continue to exceed the MCL of 10 mg/L, although they must not exceed 20 mg/L.
 4. Chlorine dioxide MRDL violations when one or more of the samples taken in the distribution system exceeded the MRDL on the day after a chlorine dioxide measurement taken at the entrance to the distribution system exceeded the MRDL, or when required samples are not taken in the distribution system.
 5. Turbidity MCL violations of 5 NTU or more, if elevated to Tier 1, or if consultation does not occur within 24 hours of the violation.
 6. Treatment technique violations resulting from a single exceedance of turbidity limits, if elevated to Tier 1, or if consultation does not occur within 24 hours of the violation.
 7. The occurrence of a waterborne disease outbreak or other waterborne emergency such as a treatment failure, chemical spill or overfeed, sewage spill, or natural disaster.
 8. Detection of E. coli, enterococci, or coliphage in a ground water source sample.
 9. Other violations or situations with significant potential to have serious adverse effects on human health as a result of short-term exposure, as determined by the PWSB.

Tier 2 (Notice as Soon as Possible, Within 30 Days)

Notice as soon as practical or within 30 days. Notice must remain in place for at least 7 days, and be repeated every three months until the violation is resolved. Community Water Systems (CWSs): Notice via mail or direct delivery. Non-Community Water Systems (NCWS): Notice via conspicuous posting, direct delivery, or mail. All PWSs must use additional delivery methods (e.g., posting of the notice in conspicuous locations throughout the area served, Internet, local newspapers, hand delivery, or delivery to community organizations) reasonably calculated to reach other consumers not notified by the first method. Violations that require Tier 2 notices include:

1. Maximum contaminant level (MCL), maximum residual disinfectant level (MRDL), and treatment technique (TT) requirement violations, except where Tier 1 notification is required by regulation or by DEQ.
2. Monitoring or testing procedure violations (if required by DEQ).
3. Failure to comply with the terms and conditions of a variance or exemption.
4. For ground water systems providing 4-log treatment, failure to maintain required treatment for more than 4 hours.
5. Failure to take any corrective action or be in compliance with a corrective action plan for a fecal indicator-positive ground water source sample.
6. Failure to take any required corrective action or be in compliance with a corrective action plan for a significant deficiency under the Ground Water Rule.
7. Special public notice for repeated failure to conduct monitoring for *Cryptosporidium*.

Systems with certain violations involving exceedance of turbidity limits must consult with DEQ as soon as practical but no later than 24 hours after learning of the violation [40 CFR 141.203(b)].

Tier 2 violations are considered less urgent than Tier 1 violations or situations because there is little immediate risk to consumers, or because the system may have already returned to compliance by the time the notice is issued. In both cases, the system will need to comply with any public notification requirements specified in 40 Code of Federal Regulations §141.203(b)(3).

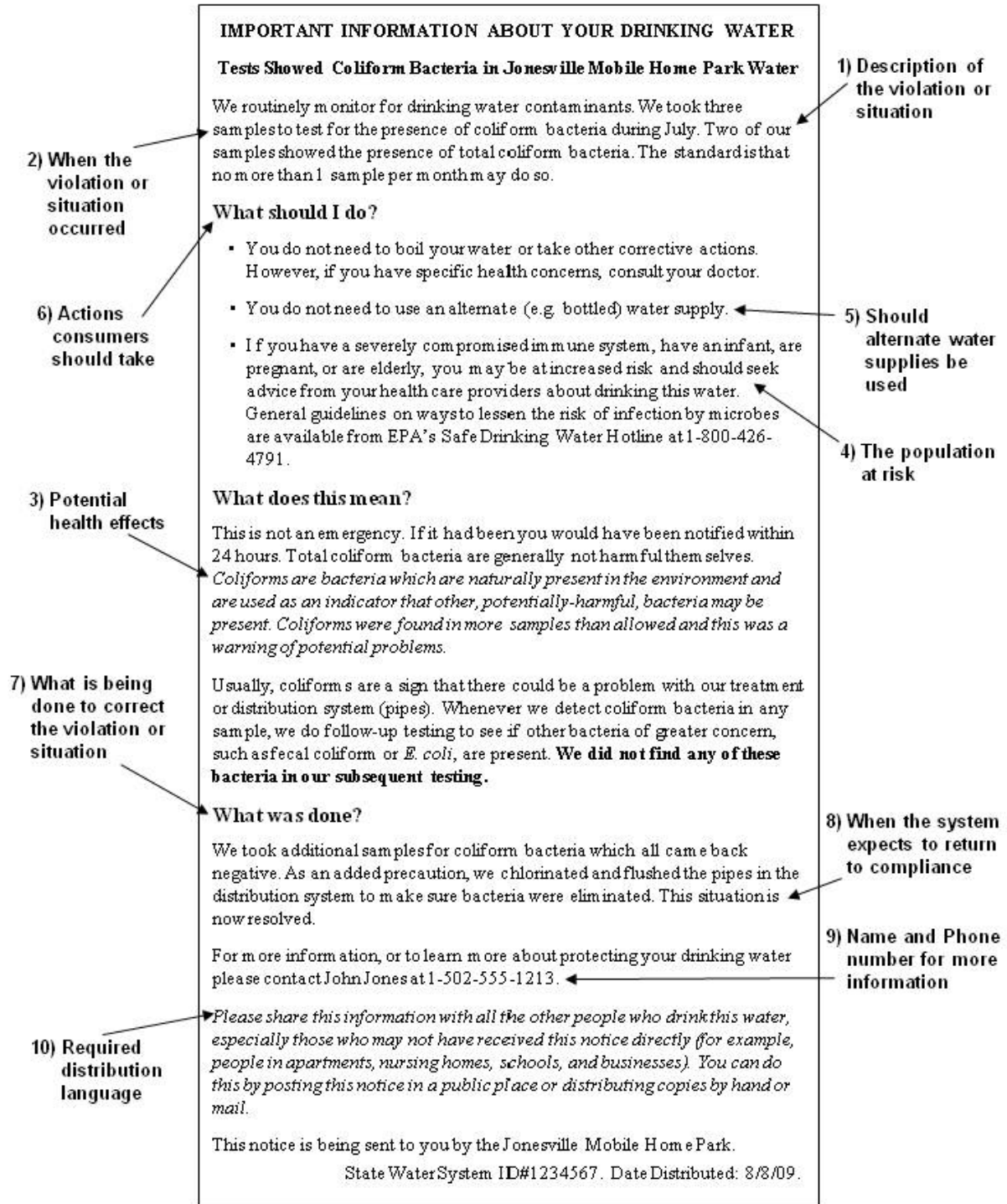
Tier 3 (Annual Notice)

Notice within 12 months, and must remain in place for the duration of the violation but not less than 7 days. The notice must be repeated annually for as long as the situation persists. Notices for individual violations can be combined into an annual notice (including the Consumer Confidence Report or CCR, if public notification requirements can still be met). CWSs: Notice via mail or direct delivery. NCWSs: Notice via conspicuous posting, direct delivery, or mail. All PWSs must use additional delivery methods (e.g., posting of the notice in conspicuous locations throughout the area served, Internet, local newspapers, hand delivery, or delivery to community organizations) reasonably calculated to reach other consumers not notified by the first method. Violations that require Tier 3 notices include:

1. Monitoring violations (except for the following: failure to take a confirmation sample for nitrate or nitrite within 24 hours and failure to take required samples for chlorine dioxide in the distribution system, which require Tier 1 notice; repeated failure to conduct *Cryptosporidium* monitoring which requires Tier 2 notice, and any monitoring violations elevated to Tier 1 or 2 by DEQ).
2. Testing procedure violations, except for failure to test for fecal coliform or *E. coli* when repeat samples are positive for coliforms, and any testing procedure violations elevated to Tier 2 by DEQ.
3. Operation under a variance or exemption.
4. Special notice for availability of unregulated contaminant monitoring data.
5. Special notice for fluoride secondary maximum contaminant level (SMCL) exceedances.

You must notify new billing customers or units, prior to, or at the time their service begins, of any ongoing violations or situations for which you have previously provided notice (40 CFR 141.206).

Sample Public Notice



Public Notification during an Intentional Contamination Emergency

Although the above public notification requirements and procedures also include those notifications that occur under emergency conditions, water quality emergencies that may have an intentional or terrorist component to them are especially problematic. This is due to the psychological impact these kinds of incidents are likely to produce within the served population. Prompt transmission of information relative to the status of the affected water system following the onset of an intentional contamination emergency is needed to prevent public confusion, doubts, misinformation, or outright panic.

Rapid contact may be established with the citizenry through several media to include:

1. AM/FM Commercial radio stations;
2. Commercial/educational/local access television stations;
3. Emergency Alert System;
4. Sound trucks;
5. Police squad cars;
6. Airplanes towing banners;
7. Pager and cell phone alert systems (where available);
8. List serve e-mails (where available);
9. Broadcast faxes;
10. Door-to-door canvassing;
11. Phone banks;
12. Recorded messages used with answering services and/or a PWSB phone number;
13. Internet; and
14. Reverse 911 (where available)

Any announcement should include accepted uses for the water and advice regarding where to obtain alternate sources of clean drinking water. The following page contains a decision tree to aid your decisions in regards to public notification. If the contaminant is known, the U.S. EPA's Water Contaminant Information Tool or WCIT may also contain information which could assist the regulatory agency, the utility, and Unified Command Team to notify the public. Additional resources can be located at:

- a. CDC, the Public Health Response to Biological, and Chemical Terrorism (<http://www.bt.cdc.gov/Documents/Planning/PlanningGuidance.PDF>)
- b. WCIT (<http://nepis.epa.gov/Exe/ZyPDF.cgi/60000C90.PDF?Dockey=60000C90.PDF>)
- c. EPA's Health Advisory Table (<http://www.epa.gov/waterscience/criteria/drinking/>)
- d. ATSDR (<http://www.atsdr.cdc.gov>) or 770-488-3430 after hours 404-498-0120 ask to speak to the ATSDR duty officer

Liaison must be established between the water system and local government and the various media to be sure that important notices, press releases, etc. will be accepted and passed on. Four types of news releases should be used to notify and get the cooperation of the general public during a crisis situation and during the recovery. These four types are the initial notice, the progress report, the explanatory news release, and the all clear at the end of the emergency. All types of releases should be submitted to the station manager of radio/TV outlets, the managing

editor of a local newspaper, etc. This is necessary if the news is to be released immediately without having to check on the validity of the information.

The initial notice should be brief, factual, and not overly alarming, and should include specifics on the nature of the emergency, its expected duration, level of water service which is available, necessity for home disinfection of drinking water, the extent of the service area affected, and sources to contact for more detailed information. If time is of the essence in alerting the public, some of the data may not be immediately available. The initial notice should be filed as rapidly as possible to reduce adverse effects upon public health and safety. Missing information can (and must) be provided in subsequent news releases.

Progress reports should be issued at regular intervals as the recovery stage begins. These reports may contain information relative to time schedules, revisions in affected areas or requirements as to quantity and purpose of permitted water usage, disinfection requirements, location of alternate sources of drinking water, repair progress, appeals for volunteer labor or specialty trades and services, etc. These reports will update the public and will help assure their cooperation. Institutions with large numbers of people can be specifically targeted. These might include nursing homes, hospitals, schools, and prisons. Many of these may have immuno-compromised individuals who require specifically tailored public outreach.

The explanatory news release will contain full details as to the effect of the particular crisis condition, types of remedial repairs which have been undertaken and why, thank the public for their cooperation, and explain the usage of outside services or agencies. The proper preparation of these news releases may require the cooperative efforts of governmental staff (Mayor, City Manager), water system personnel (Manager, Service Director, Engineer), together with representatives from the local health authority and regulatory agency.

The all clear news release will only be given once the regulatory agency, the water utility, and Unified Command Team agree that the situation has returned to normal. It should be clear and brief. In summary, good and thorough communication will assure a smoother path to recovery and enhanced customer relations, whatever the nature of the emergency.

REMEMBER, YOU MAY HAVE TO PREPARE THESE NOTICES IN LANGUAGES OTHER THAN ENGLISH AND IN VARIOUS FORMATES.