

## Ask the Experts

Each issue, we ask members of the On Tap Editorial Advisory Board to answer a drinking water-related question. We then print as many responses as space permits.

*From time to time, water quality violations can occur. In these incidences, how should utilities handle the mandatory language in public notifications (such as a boil water advisory) and consumer education (such as the annual*

*Consumer Confidence Report mandated by the Safe Drinking Water Act) so that the public doesn't lose faith in their water supply?*

### Cable TV, Talk Shows Are Options

Auburn prepares its consumer confidence report and distributes it in the local newspaper and on our Web site. We also get the word out about water quality by having our operating and management staff appear on local cable television and a radio talk show several times a year. These venues are great to get out general information regarding current issues and topics involving the water supply.

When it comes to violations requiring public notice, we have the policy of letting our local health department prepare and release the notice to the press and media. Our local health department has a public relations expert on staff who handles all the press releases from the department. This arrangement allows for consistent and definitive information to be released in both a timely and effective manner, without tying up staff or management who are generally busy resolving the issue.

During these events, we typically schedule a time when the press can ask questions of both the utility's management and the health department at least once per day. This truly lets customers know that we are on top of the problem and we, therefore, instill a confidence in their utility that they both demand and deserve. Thankfully, we've had very few of these situations over the years.



**Frank J. DeOrio**  
Director of Municipal Utilities  
City of Auburn, New York

### Make the Unpleasant Useful

Water quality violations are always an unpleasant experience. Having to admit (to the public you serve) that there may be a problem makes that experience even more unpleasant. But regulations addressing this issue exist for a purpose. And the requirements that involve keeping the public informed are a part of that

regulatory framework. Therefore, why not find ways to use the public notification regulations to your advantage?

First, adopt the attitude that public relations is an important part of your overall water utility program. This should not be a "back burner" or "I'll do it when I get around to it" program. Make it a priority. And never (I mean never) miss an opportunity to educate the people you serve as to what is going on within your water utility program.

Second, protocols need to be established. This is an internal, management issue that addresses things like who is responsible for making sure that the public notification gets written and distributed. It could also address things like the who, what, when, where, and hows of a boil water advisory. It is a good idea to go ahead and develop some typical public notification statements and have them approved by your management or board of directors. If necessary you can also have them reviewed by your regulatory agency. It is much better to develop these (in draft form) when you have the time and resources, as opposed to trying to do it when the violation actually occurs, and you have all kinds of "issues" to worry about. The mandatory language requirement is there to make sure you focus on the true issue that is a result of the violation. The nice thing about this is that you have some options on how you structure or incorporate what is mandatory into the overall statement. Deciding what will work best for your utility in advance of when it might be needed just makes the overall process much easier.

The last thing is to remember that no matter how hard you work on that public notification statement, trying to be as fair and honest as possible in addressing the issue while also incorporating the mandatory language, there will always be some negative fallout. Therefore I would encourage you to remember the "One to Ten Rule." Simply stated, this means that, within your public relations pro-

gram, for every negative issue you need 10 positive issues. Or for every bad public relations situation, you need 10 good public relations statements to keep things balanced out and maintain that positive attitude about the utility organization that you'd like your customers to have.



**Rodney L. Coker**

Tribal Utility Consultant (retired)  
Indian Health Service

## Methods, Requirements Differ

It is important to remember that the public notification rule (PNR) and the consumer confidence report (CCR) are two different things. The PNR requires notification to everyone in your service area when there's a violation. The CCR is your annual report to consumers and your primacy agency about the condition and quality of your system's water.

The U.S. Environmental Protection Agency places public notification violations under three tiers, each with a different time frame for getting the information to your customers: 24 hours for tier 1 violations, within 30 days for tier 2, and within one year for tier 3. A system is required to give public notice when it:

1. fails to comply with existing drinking water regulations,
2. has been granted a variance or exemption from the regulations,
3. has violated the terms of a variance or exemption, or
4. is facing other situations that could pose a risk to public health.

If you are faced with a violation or situation requiring public notification, you must provide notice to all the people your system serves. In some cases, you may need to contact people who may not be informed via your first notification. For example, if you provide notice to all billing customers, people who do not receive water bills—such as tenants whose utilities are included in their rent or people working but not living within your service area—would not receive a notice. To be covered, you also need to post notification in conspicuous places. Notices in more than one language may also be necessary to ensure that all customers are reached.

The tone of your notice will have a significant affect on the public's perception of their water utility. Notices need to be clear and concise, with a positive tone that indi-

cates you completely understand the problem and are taking the appropriate steps to correct it. A concise notice is much more effective than a lengthy one, and an accurate notice reinforces your credibility.

CCRs are a much different animal. They are not intended to be a public notification of violations or water quality problems. The spirit behind the CCR is to provide consumers with information on the:

- water quality in the system that serves them,
- system's susceptibility to contaminants and possible contaminant sources,
- potential health effects of contaminants,
- educational materials available to them, and
- telephone contact numbers for the utility.

It is acceptable to include what may be viewed as negative information in your CCR. By being a good "spin doctor" with these negative results, you can instill more confidence in your customers by showing them that you are performing the necessary tests and taking the appropriate actions when something isn't quite right. Take a positive approach, or as the old adage says, "turn your lemons into lemonade." This is your best chance to inform your customers about what is right with their system.

When faced with a negative situation, sometimes we become more concerned with placing blame than we are about fixing the problem itself. The primary intention of Congress in enacting the PNR and CCR requirements was to make sure that the public is kept informed of their water quality—not to make it appear as though someone has been negligent in their duties. Somehow, these positive intentions have been muddled to the point that many managers and service providers are apprehensive about issuing reports and view these regulations as tattletale documents that could put them in legal jeopardy. Actually, the opposite is true. The legal ramifications come from not informing the public. By clearly explaining a problem and what you are doing about it, you can head off any potential panic and probably get your customers to rally behind you to work toward a solution.



**Nelson Yarlott**

Resident Operator  
Greeley, Colorado