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Environmental Quality Board
P.O. Box 8477
Harrisburg, PA 17105-8477

Re: Public Comment — Proposed Rulemaking “Safe Drinking Water Revised Consumer Confidence Report Rule” (25 Pa. Code Chapter 109) — PA Bulletin Doc. No. 25-1671

Dear Chairperson Shirley and Members of the Environmental Quality Board:

I am a resident of Pittsburgh and I am writing to submit comments on the Environmental Quality Board’s proposed rulemaking titled “Safe Drinking Water Revised Consumer Confidence Report Rule” amending 25 Pa. Code Chapter 109.

I support the goal of making Consumer Confidence Reports (CCRs) more accessible, understandable, and useful to customers, and I support updates that incorporate public notification and CCR provisions for lead action level exceedances. In particular, I support aligning Pennsylvania’s requirements with the revised federal CCR rule and related updates that improve readability, risk communication, and electronic delivery options, and that require certain community water systems to provide CCRs twice per year.

To strengthen the proposed rule and maximize public health benefit, I respectfully request the Board consider the following improvements in the final-form regulation:

1. Make CCRs genuinely readable and actionable for non-technical readers.
Require a prominent, plain-language “top issues” summary that highlights (a) any exceedances/violations, (b) any lead-related information and what customers should do, and (c) where to get help. The proposal’s intent to improve clarity and risk communication is important; the final regulation should set clear expectations for plain-language presentation so CCRs do not remain overly technical.
 2. Protect equity for customers without reliable internet access.
If electronic delivery is expanded, ensure customers can still easily obtain a paper copy at no cost upon request, and ensure notices about how to obtain a paper copy are clear and prominent. Electronic delivery should not become a barrier to access, particularly for seniors, low-income households, or people with limited connectivity.
- [Pa Code and Bulletin](#)

3. Strengthen accessibility requirements for people with disabilities and for translated access.

Require that any online CCR be posted in an accessible format consistent with modern accessibility standards (e.g., screen-reader friendly). Also require clear instructions for obtaining translated versions and ensure prominent placement of these instructions, consistent with the proposal's description of summary paragraph content.

4. Ensure lead-related notifications are prominent and protective.

I support adding provisions consistent with the federal Lead and Copper Rule Revisions that require Tier 1 public notice to all consumers within 24 hours when the lead action level is exceeded. Please ensure the final rule makes lead-related information highly visible in CCRs and that the required educational and corrective-action information is communicated in a clear, prominent, and actionable manner.

5. Require direct links and durable access to the CCR when posted online.

When a CCR is posted online, require a stable direct URL that opens the report without extra navigation, and require that the report remain available for a reasonable minimum period (e.g., multiple years) so customers can compare trends over time.

Thank you for the opportunity to comment. I respectfully ask the Board to adopt a strong final-form rule that meaningfully improves clarity, access, and public health protections for all Pennsylvanians.

Sincerely,



Léon Simmons