





# ANNUAL WATER QUALITY REPORT

## Reporting Year 2023



Presented By City of Clearwater

PWS ID#: FL6520336

#### **Our Commitment**

We are pleased to present to you this year's annual water quality report. This report is a snapshot of last year's water quality covering all testing performed between January 1 and December 31, 2023. Included are details about your sources of water, what it contains, and how it compares to standards set by regulatory agencies. Our constant goal is to provide you with a safe and dependable supply of drinking water. We want you to understand the efforts we make to continually improve the water treatment process and protect our water resources. We are committed to ensuring the quality of your water and providing you with this information because informed customers are our best allies.

### Lead in Home Plumbing

If present, elevated levels of lead can cause serious health problems, especially for pregnant women and young children. Lead in drinking water is primarily from materials and components associated with service lines and home plumbing. We are responsible for providing high-quality drinking water, but we cannot control the variety of materials used in plumbing components. When your water has been sitting for several hours, you can minimize the potential for lead exposure by flushing your tap for 30 seconds to two minutes before using water for drinking or cooking. If you are concerned about lead in your water, you may wish to have your water tested. Information on lead in drinking water, testing methods, and steps you can take to minimize exposure is available from the Safe Drinking Water Hotline at (800) 426-4791, or www.epa.gov/safewater/lead.

#### **Important Health Information**

While your drinking water meets the U.S. Environmental Protection Agency's (U.S. EPA) standard for arsenic, it does contain low levels of arsenic. U.S. EPA's standard balances the current understanding of arsenic's possible health effects against the costs of removing arsenic from drinking water. U.S. EPA



continues to research the health effects of low levels of arsenic, which is a mineral known to cause cancer in humans at high concentrations and linked to other health effects such as skin damage and circulatory problems.

Some people may be more vulnerable to contaminants in drinking water than the general population. Immunocompromised persons such as persons with cancer undergoing chemotherapy, persons who have undergone organ transplants, people with HIV/AIDS or other immune system disorders, some elderly, and infants may be particularly at risk from infections. These people should seek advice about drinking water from their health care providers. The U.S. EPA/Centers for Disease Control and Prevention (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 at (800) 426-4791 or http://water.epa.gov/drink/hotline.

#### Substances That Could Be in Water

The sources of drinking water (both tap water and bottled water) include rivers, lakes, streams, ponds, reservoirs, springs, and wells. As water travels over the surface of the land or through the ground, it dissolves naturally occurring minerals and, in some cases, radioactive material and can pick up substances resulting from the presence of animals or from human activity.

Contaminants that may be present in source water include:

Microbial Contaminants, such as viruses and bacteria, which may come from sewage treatment plants, septic systems, agricultural livestock operations, and wildlife.

Inorganic Contaminants, such as salts and metals, which can be naturally occurring or result from urban stormwater runoff, industrial or domestic wastewater discharges, oil and gas production, mining, or farming.

Pesticides and Herbicides, which may come from a variety of sources such as agriculture, urban stormwater runoff, and residential uses.

Organic Chemical Contaminants, including synthetic and volatile organic chemicals, which are by-products of industrial processes and petroleum production and can also come from gas stations, urban stormwater runoff, and septic systems.

Radioactive Contaminants, which can be naturally occurring or be the result of oil and gas production and mining activities.

In order to ensure that tap water is safe to drink, the U.S. EPA prescribes regulations, which limit the amount of certain contaminants in water provided by public water systems. The Food and Drug Administration (FDA) regulations establish limits for contaminants in bottled water, which must provide the same protection for public health.

Drinking water, including bottled water, may reasonably be expected to contain at least small amounts of some contaminants. The presence of contaminants does not necessarily indicate that the water poses a health risk. More information about contaminants and potential health effects can be obtained by calling the U.S. EPA's Safe Drinking Water Hotline at (800) 426-4791.

**QUESTIONS?** We encourage you to share your thoughts with us on the information contained in this report. Please contact Water Production Manager Fred Hemerick at (727) 562-4627 if you have questions about this report.

#### **Community Participation Is Welcome**

You are invited to participate in regularly scheduled meetings. The City of Clearwater Council usually meets at 6:00 p.m. on the first and third Thursday of each month at the Clearwater Main Library. The meeting agendas are published on myclearwater.com. For more information, call (727) 562-4090.

The Pinellas County Board of County Commissioners meets

typically twice a month, usually (but not always) on the first and third Tuesday. The first meeting of the month begins at 9:30 a.m. The second monthly meeting is in two parts. Agenda items are discussed with the board at 2:00 p.m., after which there is a break, and the board reconvenes at 6:00 p.m. The public is invited to attend these meetings, held in the fifth

floor Assembly Room of the Pinellas County Courthouse, located at 315 Court Street, Clearwater. For more information, call (727) 464-3485.

The Tampa Bay Water Board of Directors meetings are held on the third Monday of every month at 9:30 a.m., at Tampa Bay Water, 2575 Enterprise Road, Clearwater. For more information, visit tampabaywater.org or call (727) 796-2355.

#### Where Does My Water Come From?

City of Clearwater residents use approximately 11 million gallons of potable water every day. Approximately 60 per cent is pumped from groundwater wells owned and operated by the city; the remaining daily demand is supplied by water purchased from Pinellas County Utilities. The groundwater source for Clearwater is the Floridan Aquifer. This aquifer is one of the major sources of groundwater in the United States and underlies all of Florida, southern Georgia, and small parts of adjacent Alabama and South Carolina.

Pinellas County Utilities receives drinking water from Tampa Bay Water, a regional water supplier. The water supplied by Tampa Bay Water is a blend of groundwater, treated surface water, and desalinated seawater. Eleven regional wellfields pumping from the Floridan Aquifer are the primary source for the groundwater supply. The Alafia River, Hillsborough River, C. W. Bill Young Regional Reservoir, and Tampa Bypass Canal are the primary supplies for the treated surface water supply. Hillsborough Bay is the primary source of seawater for the desalinated supply. For more information on the Tampa Bay Water system, visit tampabaywater.org.



Clearwater has three water treatment plants, two of which use reverse osmosis. Clearwater uses best available treatment technologies to ensure that the drinking water delivered to our consumers meets or exceeds all drinking water standards.

At Reverse Osmosis Plant No. 1, water from wells in the Upper Floridan Aquifer is filtered to remove suspended

When the well is dry, we know the worth of water." -Benjamin Franklin solids, such as iron. Then it is processed by reverse osmosis to remove selected dissolved molecules, including hardnesscausing salts. The water is disinfected using monochloramines, stabilized to protect the pipeline system, and pumped to consumers.

At Reverse Osmosis Plant No. 2, brackish

water from the lower portions of the Upper Floridan Aquifer is treated by reverse osmosis to remove selected dissolved molecules, including hardness-causing salts. The water is then treated with ozone to remove sulfide, disinfected using monochloramines, stabilized to protect the pipeline system, and pumped to consumers.

At Water Plant No. 3, raw water from the Upper Floridan Aquifer is blended with water supplied by Pinellas County Utilities, disinfected using monochloramines, stabilized to protect the pipeline system, and pumped to consumers.

#### Source Water Assessment

In 2023 the Florida Department of Environmental Protection (FDEP) performed a source water assessment of our system. The assessment was conducted to provide information about any potential



sources of contamination about any potential sources of contamination in the vicinity of our wells. There are 44 potential contaminant sources, ranging from low to moderate levels of concern. FDEP also performed source water assessments for the Tampa Bay Water facilities in 2023. All assessment results are available on the FDEP Source Water Assessment and Protection Program website at prodapps.dep.state.fl.us/swapp or from Tampa Bay Water, 2575 Enterprise Road, Clearwater, FL 33763, or by calling (727) 796-2355.

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#### **Test Results**

Our water is monitored for many different kinds of substances on a very strict sampling schedule, and the water we deliver must meet specific health standards. Here, we only show those substances that were detected in our water (a complete list of all our analytical results is available upon request). Remember that detecting a substance does not mean the water is unsafe to drink; our goal is to keep all detects below their respective maximum allowed levels.

The state recommends monitoring for certain substances less than once per year because the concentrations of these substances do not change frequently. In these cases, the most recent sample data are included, along with the year in which the sample was taken.

PRIMARY REGULATED CONTAMINANTS															
Microbiological Contaminants															
		City	of Clearw	ater	Pinellas	Tampa									
CONTAMINANT AND UNIT OF MEASUREMENT	TT VIOLATIO (YES/NO)	N DATES OF SA (MO./Y	AMPLING 'R.)	RESULT	DATES OF SAM (MO./YR	DATES OF SAMPLING (MO./YR.)		DATES OF SAMPLING (MO./YR.)		RESULT	MCLG	LG TT LIKEL		Y SOURCE OF CONTAMINATION	
<b>Total Coliform Bacteria</b> <sup>1</sup> (positive samples)	2 No	1/23-12	2/23	NA	1/23-12/	23	NA	NA		NA	NA	ТΤ	Natura	lly present in the environment	
		City o	City of Clearwater			Pinellas County Utilities			Tampa Bay Water						
CONTAMINANT AND UNIT OF MEASUREMENT	MCL VIOLATIO (YES/NO)	DATES OF SAMPLING (MO./YR.)	TOTAL POSITIN FO	NUMBER OF /E SAMPLES R YEAR	DATES OF SAMPLING (MO./YR.)	total Posit F	l number of Tive samples For year	DATES OF TOTAL NUMBER SAMPLING POSITIVE SAMPL (MO./YR.) FOR YEAR		Number of /e Samples r Year	= S MCLO	à	MCL	LIKELY SOURCE OF CONTAMINATION	
<i>E. coli</i> <sup>3</sup> (positive samples)	No	1/23-12/23		0	1/23-12/23		0	NA	NA		0	fo	See ootnote	Human and animal fecal waste	
			Tampa Bay Water												
CONTAMINANT AND UNIT OF MEASUREMENT	MCL VIOLATION (YES/NO)	DATES OF SAMPL (MO./YR.)	.ING	HIGHEST SING MEASUREMEN	HIGHEST SINGLE LOWEST MONTHLY PERCENTAGE OF MEASUREMENT SAMPLES MEETING REGULATORY LIMITS MCLG MCL LIKELY SOURCE							RCE C	OF CONTA	MINATION	
Turbidity <sup>4</sup> (NTU)	No	1/23-12/23		0.310			100		NA TT Soil runoff						

#### Definitions

**90th %ile:** The levels reported for lead and copper represent the 90th percentile of the total number of sites tested. The 90th percentile is equal to or greater than 90% of our lead and copper detections.

AL (Action Level): The concentration of a contaminant which, if exceeded, triggers treatment or other requirements which a water system must follow.

MCL (Maximum Contaminant Level): The highest level of a contaminant that is allowed in drinking water. MCLs are set as close to the MCLGs as feasible using the best available treatment technology. MCLG (Maximum Contaminant Level Goal): The level of a contaminant in drinking water below which there is no known or expected risk to health. MCLGs allow for a margin of safety.

MRDL (Maximum Residual Disinfectant Level): The highest level of a disinfectant allowed in drinking water. There is convincing evidence that addition of a disinfectant is necessary for control of microbial contaminants.

MRDLG (Maximum Residual Disinfectant Level Goal): The level of a drinking water disinfectant below which there is no known or expected risk to health. MRDLGs do not reflect the benefits of the use of disinfectants to control microbial contaminants.

#### **NA:** Not applicable.

**ND** (Not detected): Indicates that the substance was not found by laboratory analysis.

NTU (Nephelometric Turbidity Units):

Measurement of the clarity, or turbidity, of water. Turbidity in excess of 5 NTU is just noticeable to the average person.

**pCi/L (picocuries per liter):** A measure of radioactivity.

**ppb** (μg/L) (parts per billion): One part substance per billion parts water (or micrograms per liter). **ppm (mg/L) (parts per million):** One part substance per million parts water (or milligrams per liter).

**ppt (ng/L) (parts per trillion):** One part substance per trillion parts water (or nanograms per liter).

**TT (Treatment Technique):** A required process intended to reduce the level of a contaminant in drinking water.

RADIOACTIVE CONTAMINANTS <sup>5</sup>														
		City of Clearwa	ter	Pine	llas County Uti	lities	Ta	impa Bay Wate	er					
CONTAMINANT AND UNIT MCL VIOLATION OF MEASUREMENT (YES/NO)		DATES OF SAMPLING (MO./YR.)	LEVEL RANGE OF S DETECTED RESULTS		DATES OF SAMPLING (MO./YR.)	s of Ling level Ran (Yr.) detected res		DATES OF SAMPLING LEVEL (MO./YR.) DETECTED		RANGE OF RESULTS	MCLG MCL		LIKELY SOURCE OF CONTAMINATION	
Alpha Emitters (pCi/	L) No	2/23	ND	NA	3/23	ND	NA	4/23	3.6	2.6–3.6	0	15	Erosion of natural deposits	
Radium 226 + 228No[combined radium](pCi/L)		2/23	1.05	ND-1.05	3/23	ND	NA	4/23	2.3	0.7–2.3	0	5	Erosion of natural deposits	
INORGANIC CONTAMINANTS														
			City of Clearwat	er	Pin	ellas County U	tilities	Ta	er					
CONTAMINANT AND UNIT OF MEASUREMENT	MCL VIOLATION (YES/NO)	DATES OF SAMPLING (MO./YR.)	LEVEL DETECTED	RANGE OF RESULTS	DATES OF SAMPLING (MO./YR.)	E LEVEL	RANGE OF RESULTS	DATES OF SAMPLING (MO./YR.)	LEVEL DETECTED	RANGE OF RESULTS	MCLG	MCL	LIKELY SOURCE OF CONTAMINATION	
Arsenic (ppb)	No	2/23	6.4	ND-6.4	3/23	0.4	NA	NA	NA	NA	0	10	Erosion of natural deposits; runoff from orchards; runoff from glass and electronics production wastes	
Barium (ppm)	No	2/23	0.016	0.01–0.016	5 3/23	0.0145	NA	NA	NA	NA	2	2	Discharge of drilling wastes; discharge from metal refineries; erosion of natural deposits	
Chromium (ppb)	No	2/23	ND	NA	3/23	3.8	NA	NA	NA	NA	100	100	Discharge from steel and pulp mills; erosion of natural deposits	
Fluoride (ppm)	No	2/23	0.52	0.50–0.52	3/23	0.66	NA	NA	NA	NA	4	4.0	Erosion of natural deposits; discharge from fertilizer and aluminum factories; water additive which promotes strong teeth when at the optimum level of 0.7 ppm	
<b>Mercury [inorganic]</b> (ppb)	No	2/23	ND	NA	3/23	0.019	NA	NA	NA	NA	2	2	Erosion of natural deposits; discharge from refineries and factories; runoff from landfills; runoff from cropland	
Nickel (ppb)	No	2/23	ND	NA	3/23	2.3	NA	NA	NA	NA	NA	100	Pollution from mining and refining operations; natural occurrence in soil	
Nitrate [as nitrogen] (ppm)	No	2/23	0.35	ND-0.35	3/23	0.08	NA	NA	NA	NA	10	10	Runoff from fertilizer use; leaching from septic tanks, sewage; erosion of natural deposits	
Sodium (ppm)	No	2/23	69.4	27.3–69.4	3/23	20.2	NA	NA	NA	NA	NA	160	Saltwater intrusion; leaching from soil	
SYNTHETIC ORGAN	NIC CONTAMINA	ANTS INCLU	DING PESTI	CIDES AND H	IERBICIDES									
		City of Clearwat	er	Pin	ellas County U	tilities	T:	amna Bav Wat	er					

			LITY OF Clearwater		Pine	lias County Uti	lities	51	er.				
CONTAMINANT AND UNIT OF MEASUREMENT	MCL VIOLATION (YES/NO)	DATES OF SAMPLING (MO./YR.)	LEVEL DETECTED	RANGE OF RESULTS	DATES OF SAMPLING (MO./YR.)	LEVEL DETECTED	RANGE OF RESULTS	DATES OF SAMPLING (MO./YR.)	LEVEL DETECTED	RANGE OF RESULTS	MCLG	MCL	LIKELY SOURCE OF CONTAMINATION
Benzo(a)pyrene [PAH] (ppt)	No	2/23	41	ND-41	NA	NA	NA	NA	NA	NA	0	200	Leaching from linings of water storage tanks and distribution lines
Di(2-ethylhexyl) Phthalate (ppb)	No	2/23	1.1	0.87-1.1	NA	NA	NA	NA	NA	NA	0	6	Discharge from rubber and chemical factories

STAGE 1 DISINFECTANTS AND DISINFECTION BY-PRODUCTS																			
City of Clearwa				y of Clearwate	r	Pinellas County Utilities Tampa Bay Water													
CONTAMINANT AND UNIT OF MEASUREMENT	MCL VIOLATIO (YES/NO	D N S ) (	DATES OF SAMPLING MO./YR.)	LEVEL DETECTED	RANGE OF RESULTS	DATES OF SAMPLING (MO./YR.)	LEVEL DETECTED	RANGE O RESULTS	F S	DATES OF GAMPLING MO./YR.)	LE DETE	VEL CTED	RAN RES	GE OF SULTS	MCLG OR [MRDLG]	MCL OR [MRDL]	LIKELY S	LIKELY SOURCE OF CONTAMINATION	
Bromate <sup>6</sup> (ppb)	No	1/	/23-12/23	3.94	0.3–9.9	NA	NA	NA	1/	1/23-12/23		.6	ND	-2.56	0 10		By-product of drinking water disinfection		
<b>Chlorine</b> <sup>7</sup> (ppm	l) No	1/	/23-12/23	2.89	0.4–5.2	1/23- 12/23	3.7	0.61– 5.70		NA	N	NA		NA	[4] [4.0]		Water additive used to control microbes		
					Tan	npa Bay Water													
CONTAMINANT AN OF MEASUREMEN	ND UNIT AG	CUTE VIO (YES/I	LATIONS NO)	DATES OF S (MO./^	ampling n 'r.)	ONACUTE VIOLATIONS (YES/NO)		LEVEL DETECTED	MRDL	MRDL (AT EI		INTRANCE TO ION SYSTEM) LIKEL		LIKELY S	OURCE OF C	ONTAMIN	ATION		
Chlorine Dioxi	de <sup>8</sup> (ppb)	No	)	4/1	9	NA		0.50	800		80	0		Water a	dditive used	l to contr	ol microbo	es	
					Tampa Bay Water														
CONTAMINANT AND UNIT OF MEASUREMENT	CONTAMINANT MCL DATES O AND UNIT OF VIOLATION SAMPLING MEASUREMENT (YES/NO) (MO./YR.			HIG (3-S E	HEST MONTH AMPLE SET C ISTRIBUTION	LY AVERAGE OLLECTED IN SYSTEM)	HIGI FOLLC ENTR	HEST AVERA DWING A DA ANCE TO DI	AGE (3-: ILY MCI ISTRIBL	IE (3-SAMPLE SET) Y MCL VIOLATION AT TRIBUTION SYSTEM MCLG M					IKELY SOUR	CE OF CO	NTAMINATI	ON	
<b>Chlorite</b> <sup>9</sup> (ppm)	) No	1	/23-12/23	3	0.006	18			NA			0.8		1.0	By-product	t of drinking water disinfection			
Tampa Bay Water																			
CONTAMINANT AN OF MEASUREM	DATES	OF SAMPLING (MO/YR)	LOWEST	RUNNING ANN TERLY, OF MO	NUAL AVERAGE, COMPUTED ONTHLY REMOVAL RATIOS			RANGE OF MONTHLY REMOVAL RATIOS MCLG			i MC		Y SOURCI	E OF CONT	AMINATION				
Total Organic Carbon No 1   [TOC] <sup>10</sup> (ppm) 1			1/	23-12/23			2.11			1.74–3.81 NA			NA	T	Γ Natu	urally pres	sent in the	environment	
STAGE 2 DISI	NFECTANTS /	AND DI	SINFECT	ION BY-PRO	DUCTS														
				C	ty of Clearwate	r	Pinellas County Utilities					Tan	npa Bay Wa	ter					
CONTAMINANT AN MEASUREMENT		VIC (YE	MCL DATES OF OLATION SAMPLING YES/NO) (MO./YR.)		LEVEL DETECTED	RANGE OF RESULTS	DATES ( SAMPLIN (MO./YF	DATES OF SAMPLING LEVEL (MO./YR.) DETECTE		RANGE RESUI	DATES ( OF SAMPLII LTS (MO./YI		)ATES OF SAMPLING LEV (MO./YR.) DETE		RANGE OF RESULTS	MCLG	LIK MCL CO	ELY SOURCE OF NTAMINATION	
Haloacetic Acid Stage 2 (ppb)	ls (five) [HAA	5]-	No	2/23, 5/23, 8/23, 11/23	27.3	7.2–35.1	2/23, 5/ 8/23, 11	23, 29 /23	.87	15.08-4	44.33 NA		NA	NA	NA	60 By	r-product of drinking iter disinfection		
TTHM [total tr Stage 2 (ppb)	rihalomethane	es]—	No 2/23, 5/23, 8/23, 11/23		65	24.3– 69.0	2/23, 5/23, 42.4 8/23, 11/23		.46	16.62-4	43.70 NA		NA NA		NA NA		80 By-product of drinking water disinfection		
LEAD AND CO	OPPER (TAP V	VATER S	SAMPLES	WERE COL	LECTED FR	OM SITES T	HROUGH	OUT THE	СОМ	MUNITY	()								
			City	/ of Clearwater			Pinellas Co	unty Utilities				Tar	mpa Ba	y Water					
CONTAMINANT AND UNIT OF MEASUREMENT	AL EXCEEDANCE (YES/NO)	DATES SAMPL (MO./\	i of Ing pei Yr.) f	90TH RCENTILE RESULT E	NO. OF SAMPLING SITES XCEEDING AI	DATES OF SAMPLING . (MO./YR.)	90T PERCE	'H S NTILE JLT EX	NO. O SAMPLII SITES CEEDIN	F NG D S S IGAL (	DATES OF SAMPLING MO./YR.)	90TH PERCENTILE RESULT E		i s Tile LT EX(	NO. OF SAMPLING SITES CEEDING AL	MCLG	AL (ACTION LEVEL)	LIKELY SOURCE OF CONTAMINATION	
Copper (ppm)	No	6/23–8	8/23	0.34	0	7/23–8/2	3 0.	3	0		NA	NA		JA NA		1.3	1.3	Corrosion of household plumbing systems; erosion of natural deposits; leaching from wood preservatives	
Lead (ppb)	No	6/23-8	8/23	1.2	2	7/23 -8/2	3 0.3	8	1		NA		NA		NA	0	15	Corrosion of household plumbing systems, erosion of natural deposits	

<sup>1</sup>The City of Clearwater collects at least 110 water samples a month for total coliform bacteria analysis.

<sup>2</sup> Pinellas County Utilities collects at least 210 water samples a month for total coliform bacteria analysis.

<sup>3</sup>Routine and repeat samples are total coliform-positive and either *E. coli*-positive, or system fails to take repeat samples following *E. coli*-positive routine sample, or system fails to analyze total coliform-positive repeat sample for *E. coli*. <sup>4</sup>Turbidity is a measure of the cloudiness of the water. It is monitored because it is a good indicator of the effectiveness of the filtration system. High turbidity can hinder the effectiveness of disinfectants. The result in the Lowest Monthly Percentage column is the lowest monthly percentage of samples meeting the turbidity limits reported in the Monthly Operating Report.

<sup>5</sup>Results in the Level Detected column for radioactive contaminants are the highest average at any of the sampling points or the highest detected level at any sampling point, depending on the sampling frequency. All the levels detected and ranges of results reported were below the MCL.

<sup>6</sup> The level detected is the highest running annual average, computed quarterly, of monthly averages of all samples collected. The levels detected and ranges of results reported were below the MCL.

<sup>7</sup> For chloramines or chlorine, the level detected is the highest running annual average, computed quarterly, of monthly averages of all samples collected. The range of results encompasses the highest and lowest results of all the individual samples collected during the past year.

<sup>8</sup> For chlorine dioxide, the level detected is the highest single daily sample collected at the entrance to the distribution system. Acute MRDL violation: If any daily sample taken at the entrance to the distribution system exceeds the MRDL, and on the following day one or more of the three samples taken in the distribution system exceeds the MRDL, then the system is in violation. Failure to take samples in the distribution system the day following an exceedance of the chlorine dioxide MRDL at the entrance to the distribution system exceed the MRDL violation. If any two consecutive daily samples taken at the entrance to the distribution system exceed the MRDL, and all distribution system samples are less than the MRDL, the system is in violation of the MRDL. The facility did not use any chlorine dioxide in its operation in 2023.

<sup>9</sup> The highest monthly average was below the MCL and the MCLG.

<sup>10</sup> The monthly TOC removal ratio is the ratio between actual TOC removal and TOC rule removal requirements.