



CITY OF SIERRA MADRE

# 2015 CONSUMER CONFIDENCE REPORT

## INTRODUCTION

The City of Sierra Madre is committed to keeping you informed about the quality of your drinking water. This report is provided to you annually and includes information about where your drinking water comes from, the constituents found in your drinking water and how the water quality compares with the regulatory standards. We remain dedicated to providing you with a reliable supply of high quality drinking water.



### Your views are welcome!

The City Council meets the second and fourth Tuesday of each month. Unless otherwise announced, the meetings are held in the City Council Chambers at 232 W. Sierra Madre Blvd. and typically begin at 6:30 P.M.

## DRINKING WATER SOURCE ASSESSMENT

In accordance with the federal Safe Drinking Water Act, an assessment of the drinking water sources for the City of Sierra Madre was completed in November 2002. The purpose of the drinking water source assessment is to promote source water protection by identifying types of activities in the proximity of the drinking water sources which could pose a threat to the water quality. The assessment concluded that City of Sierra Madre's groundwater wells generally are not vulnerable to contamination. However, wells are located within the proximity of gasoline stations, chemical and petroleum storage facilities, automobile repair shops, and areas of fertilizer/pesticide applications, which are possible sources of contamination.

Every five years, MWD is required by DDW to examine possible sources of drinking water contamination in its State Water Project and Colorado River source waters. In 2012, MWD submitted to DDW its updated Watershed Sanitary Surveys for the Colorado River and State Water Project, which include suggestions for how to better protect these source waters. Both source waters are exposed to stormwater runoff, recreational activities, wastewater discharges, wildlife, fires, and other watershed-related factors that could affect water quality. Water from the Colorado River is considered to be most vulnerable to contamination from recreation, urban/stormwater

## WHAT ARE WATER QUALITY STANDARDS?

In order to ensure that tap water is safe to drink, the United States Environmental Protection Agency (USEPA) and State Water Resources Control Board, Division of Drinking Water (DDW) prescribe regulations that limit the amount of certain contaminants in water provided by public water systems. DDW regulations also establish limits for contaminants in bottled water that provide the same protection for public health.

Drinking water standards established by USEPA and DDW are limits for substances that may affect consumer health or aesthetic qualities of drinking water. The chart in this report shows the following types of water quality standards:

**Maximum Contaminant Level (MCL):** The highest level of a contaminant that is allowed in drinking water. Primary MCLs are set as close to the PHGs (or MCLGs) as is economically and technologically feasible.

**Maximum Residual Disinfectant Level (MRDL):** 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.

**Secondary MCLs** are set to protect the odor, taste, and appearance of drinking water.

**Primary Drinking Water Standard:** MCLs and MRDLs for contaminants that affect health along with their monitoring and reporting requirements, and water treatment requirements.

## WHAT IS A WATER QUALITY GOAL?

In addition to mandatory water quality standards, USEPA and DDW have set voluntary water quality goals for some contaminants. Water quality goals are often set at such low levels that they are not achievable in practice and are not directly measurable. Nevertheless, these goals provide useful guideposts and direction for water management practices. The chart in this report includes three types of water quality goals:

**Maximum Contaminant Level Goal (MCLG):** The level of a contaminant in drinking water below which there is no known or expected risk to health. MCLGs are set by the USEPA.

**Maximum Residual Disinfectant Level Goal (MRDLG):** 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.

**Public Health Goal (PHG):** The level of a contaminant in drinking water below which there is no known or expected risk to health. PHGs are set by the California Environmental Protection Agency.

## WHERE DOES MY DRINKING WATER COME FROM?

During calendar year 2015, the water supply for the City of Sierra Madre came from three sources:

- 1 Groundwater from wells in the East Raymond Basin,
- 2 Natural spring tunnel located in our foothills, and
- 3 Treated surface water from Metropolitan Water District of Southern California (MWD). All water is treated with chlorine disinfection or chloramines disinfection before it is delivered to your home.

## QUESTIONS?

For more information or questions regarding this report, please contact Mr. Jose Reynoso at (626) 355-7135 ext 813.

Este informe contiene información muy importante sobre su agua potable. Para más información ó traducción, favor de contactar a Mr. Jose Reynoso. Telefono: (626) 355-7135 ext 813.

此份有關你的食水報告,內有重要資料和訊息,請找他人為你翻譯及解釋清楚。



## LETTER FROM THE DIRECTOR

### Dear Sierra Madre Water Customer:

The traditional October 15 - April 15 rainy season is now over, and in spite of the media attention regarding El Nino, rainfall in Sierra Madre has just barely reached the amount of rain received last year. In Sierra Madre and much of southern California, the drought continues. The State has relaxed, but not eliminated the need to conserve water. In fact, the recently relaxed regulations still require that all water agencies conserve water to the level they need to match and not exceed their available water supplies. With water levels in the aquifer serving Sierra Madre remaining very low it is very important that Sierra Madre water customers continue in their resolve to conserve. The State's water conservation requirement of reducing water use by 32% as compared to 2013 water use, began 11 months ago. In only three of those months (June 2015, March 2016, and April 2016) did Sierra Madre meet the State's conservation goal. The failure to meet the conservation goal in eight of the eleven months resulted in the State regulators contacting the City in order to encourage improved conservation efforts. The City has not yet been informed of the State's enforcement action, but the State could impose steep financial penalties or require the implementation of more severe conservation measures. It is imperative that as the weather warms, Sierra Madre continues as a community to keep up its efforts to conserve water.

In an effort to bolster customers' conservation efforts, on May 10th, the City Council adopted Resolution No. 16-23, which increases the penalty rate for water used in excess of a customer's conservation target to "2 times the Tier IV water rate", or \$10.72 per billing unit. This penalty rate will go into effect:

For water customers who live east of Baldwin Avenue, receiving a water bill in September, the penalty rate will apply to water used after June 14, 2016. After this date, water consumed in excess of the customer's assigned conservation target will be charged a penalty of \$10.72 per billing unit.

### WHAT CONTAMINANTS MAY BE PRESENT IN SOURCES OF DRINKING WATER?

The sources of drinking water generally 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** that may come from a variety of sources such as agriculture, urban stormwater runoff and residential uses.
- **Radioactive contaminants** that can be naturally-occurring or can be the result of oil and gas production and mining activities.
- **Organic chemical contaminants**, including synthetic and volatile organic chemicals that are byproducts of industrial processes and petroleum production, and can also come from gasoline stations, urban stormwater runoff, agriculture application and septic systems.

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 water poses a health risk. More information about contaminants and potential health effects can be obtained by calling the USEPA's Safe Drinking Water Hotline (1-800-426-4791).

Your drinking water is regularly tested using DDW approved methods to ensure its safety. The table in this report lists all the constituents detected in your drinking water that have Federal and State drinking water standards. Detected unregulated constituents and other constituents of interest are also included.

### ARE THERE ANY PRECAUTIONS THE PUBLIC SHOULD CONSIDER?

Some people may be more vulnerable to contaminants in drinking water than the general population. Immuno-compromised 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 can be particularly at risk from infections. These people should seek advice about drinking water from their health care providers. USEPA/Centers for Disease Control (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 (1-800-426-4791).

For water customers who live west of Baldwin Avenue, receiving a water bill in October, the penalty rate will apply to water used after July 12, 2016. After this date, water consumed in excess of the customer's assigned conservation target will be charged a penalty of \$10.72 per billing unit.

Fortunately a majority of Sierra Madre water customers have met or bettered their conservation goals, and customers who continue to stay within their conservation goals, or use less water than their conservation goal, will not incur penalties. To those customers, the City says thank you, and keep up the good work.

For those customers who are using more water than their conservation goal, we would direct you to the City's website at [www.cityofsierramadre.com](http://www.cityofsierramadre.com) and to that of the City's imported water provider [www.sgvmd.org](http://www.sgvmd.org). There you can find conservation advice, rebate information, and links to other water conservation assistance. Also, you can contact Ms. Clare Lin at Sierra Madre City Hall at (626) 355-7135 ext.802 or [clin@cityofsierramadre.com](mailto:clin@cityofsierramadre.com) in order to schedule a free water audit at your home. The audits are performed by Ms. Lin and other City-staff who are professional Water Conservation Practitioners. The water audits are designed to help you optimize the use of water in your home and garden, and assist you in reducing your water bill.

Please feel free to contact me should you have any questions. I can be reached at (626) 355-5839 (direct) or [binman@cityofsierramadre.com](mailto:binman@cityofsierramadre.com).

Sincerely, Bruce Inman

Director of Public Works , City of Sierra Madre

### LEAD IN TAP WATER

If present, elevated levels of lead can cause serious 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. The City of Sierra Madre is responsible for providing high quality drinking water, but 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 2 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 U.S. Environmental Protection Agency's Safe Drinking Water Hotline or at <https://www.epa.gov/your-drinking-water/basic-information-about-lead-drinking-water>.



**THE WATER QUALITY DATA CHART LISTS ALL DRINKING WATER CONTAMINANTS DETECTED DURING THE 2015 CALENDAR YEAR.**

The presence of these contaminants in the water does not necessarily indicate the water poses a health risk. PWD tests for many contaminants in addition to those listed in the chart. Test results for these additional contaminants were all “None Detected (ND)” and are not required to be included in the chart. The state allows us to monitor for some contaminants less than once per year because the concentrations of these contaminants do not

change frequently. As a result, some of the data, though representative of the water quality, is more than one year old. Unless otherwise noted, the data presented in this chart is from testing performed January 1 to December 31, 2015. Unregulated contaminant monitoring helps USEPA and the State Water Resources Control Board to determine where certain contaminants occur and whether the contaminants need to be regulated.

**2015 CITY OF SIERRA MADRE GROUNDWATER QUALITY <sup>[1]</sup>**

Chemical	MCL	PHG or (MCLG)	Average	Amount	Range of Detections	MCL Violations?	Most Recent Testing	Typical Source of Contaminant
<b>Primary Drinking Water Standards--Health-Related Standards</b>								
Radiologicals								
Uranium (pCi/L)	20	0.43	1.1		ND - 1.7	No	2015	Erosion of natural deposits
Inorganic Chemicals								
Aluminum (ppm)	1	0.6	0.058		ND - 0.2	No	2014	Erosion of natural deposits
Fluoride (ppm)	2	1	0.92		0.55 - 1.7	No	2014	Erosion of natural deposits
Chromium, Hexavalent (ppb)	10	0.02	<1		ND - 2	No	2013	Erosion of natural deposits; industrial discharge
Nitrate as N (ppm)	10	10	0.74		ND - 1.5	No	Quarterly	Fertilizers, Septic Tanks
<b>Secondary Standards<sup>[2]</sup></b>								
Aluminum (ppb) <sup>[3]</sup>	200	600	58		ND - 200	No	2014	Erosion of natural deposits
Chloride (ppm)	500	n/a	12		8 - 19	No	2015	Erosion of natural deposits
Foaming Agents (MBAS) (ppb)	500	n/a	14		ND - 69	No	2014	Municipal and industrial waste discharges
Iron (ppb)	300	n/a	100		ND - 260	No	2014	Leaching from natural deposits; industrial wastes
Odor (threshold odor number)	3	n/a	1		1	No	2015	Naturally present in the groundwater
Specific Conductance (µmho/cm)	1,600	n/a	420		370 - 470	No	2015	Substances that form ions in water
Sulfate (ppm)	500	n/a	24		15 - 44	No	2015	Erosion of natural deposits
Total Dissolved Solids (ppm)	1,000	n/a	240		210 - 290	No	2015	Erosion of natural deposits
Turbidity (NTU)	5	n/a	0.96		ND - 2.8	No	2015	Erosion of natural deposits
<b>Unregulated Chemicals</b>								
Alkalinity, total as CaCO3 (ppm)	Not Regulated	n/a	170		150 - 180	n/a	2015	Run off / leaching from natural deposits
Calcium (ppm)	Not Regulated	n/a	50.2		42.1 - 64.6	n/a	2015	Run off / leaching from natural deposits
Hardness, total as CaCO3 (ppm)	Not Regulated	n/a	178		157 - 198	n/a	2014	Erosion of natural deposits
Hardness, total (grains/gal)	Not Regulated	n/a	10.4		9.21 - 11.6	n/a	2014	Erosion of natural deposits
Magnesium (ppm)	Not Regulated	n/a	12		8.9 - 14	n/a	2014	Run off / leaching from natural deposits
pH (pH Units)	Not Regulated	n/a	7.6		7.5 - 7.7	n/a	2014	Hydrogen ion concentration
Potassium (ppm)	Not Regulated	n/a	1.4		1.1 - 1.9	n/a	2014	Run off / leaching from natural deposits
Sodium (ppm)	Not Regulated	n/a	16		14 - 19	n/a	2014	Erosion of natural deposits
Total Organic Carbon (ppm)	TT <sup>[4]</sup>	n/a	0.37		ND - 0.66	n/a	Monthly	Naturally present in the groundwater

**2015 CITY OF SIERRA MADRE SURFACE WATER QUALITY**

Chemical	MCL	PHG or (MCLG)	Average	Amount	Range of Detections	MCL Violations?	Most Recent Testing	Typical Source of Contaminant
<b>Primary Drinking Water Standards--Health-Related Standards</b>								
Radiologicals								
Gross Alpha Particle (pCi/L)	15	(0)	ND		ND - 4	No	2014	Erosion of natural deposits
Gross Beta Particle (pCi/L)	50	(0)	5		4 - 6	No	2014	Decay of natural and man-made deposits
Uranium (pCi/L)	20	0.43	3		2 - 3	No	2014	Erosion of natural deposits
Inorganic Chemicals								
Aluminum (ppm)	1	0.6	0.156		0.088 - 0.2	No	2015	Water treatment process residue
Arsenic (ppb)	10	0.004	2.1		2.1	No	2015	Erosion of natural deposits
Barium (ppm)	1	2	0.122		0.122	No	2015	Refinery discharge; erosion of natural deposits
Fluoride (ppm) Treatment Optimal Control Range 0.6 - 1.2	2	1	0.8		0.6 - 1	No	2015	Treatment additive for dental health

Chemical	MCL	PHG or (MCLG)	Average	Amount	Range of Detections	MCL Violations?	Most Recent Testing	Typical Source of Contaminant
<b>Secondary Standards<sup>[2]</sup></b>								
Aluminum (ppb) <sup>[3]</sup>	200	600	156		88 - 200	No	2015	Water treatment process residue
Chloride (ppm)	500	n/a	100		98 - 102	No	2015	Runoff or leaching from natural deposits
Color (Color Units)	15	n/a	1		1	No	2015	Naturally-occurring organic materials
Odor (threshold odor number)	3	n/a	2		2	No	2015	Naturally-occurring organic materials
Specific Conductance (µmho/cm)	1600	n/a	1,040		1,030 - 1,060	No	2015	Substances that form ions in water
Sulfate (ppm)	500	n/a	257		252 - 261	No	2015	Runoff or leaching from natural deposits
Total Dissolved Solids (ppm)	1000	n/a	660		654 - 665	No	2015	Runoff or leaching from natural deposits
<b>Unregulated Chemicals</b>								
Boron (ppm)	NL=1	n/a	0.12		0.12	n/a	2015	Runoff or Leaching from Natural Deposits
Alkalinity, total as CaCO3 (ppm)	Not Regulated	n/a	126		123 - 129	n/a	2015	Run off / leaching from natural deposits
Calcium (ppm)	Not Regulated	n/a	78		77 - 78	n/a	2015	Run off / leaching from natural deposits
Hardness, total as CaCO3 (ppm)	Not Regulated	n/a	300		296 - 304	n/a	2015	Erosion of natural deposits
Hardness, total (grains/gal)	Not Regulated	n/a	17.6		17.4 - 17.8	n/a	2015	Erosion of natural deposits
Magnesium (ppm)	Not Regulated	n/a	27		26 - 28	n/a	2015	Run off / leaching from natural deposits
N-Nitrosodimethylamine (ppt)	NL=10	3	ND		ND - 2.1	n/a	2015	Byproduct of chloramination, industrial process
pH (pH Units)	Not Regulated	n/a	8.1		8.1	n/a	2015	Hydrogen ion concentration
Potassium (ppm)	Not Regulated	n/a	4.9		4.8 - 5	n/a	2015	Run off / leaching from natural deposits
Sodium (ppm)	Not Regulated	n/a	100		97 - 102	n/a	2015	Erosion of natural deposits
Total Organic Carbon (ppm)	TT <sup>[4]</sup>	n/a	2.6		2.4 - 2.8	n/a	2015	Naturally present in the groundwater
Turbidity - combined filter effluent		Treatment Technique		Turbidity Measurements		TT Violation?		Typical Source of Contaminant

**Metropolitan Water District Weymouth Filtration Plant**

1) Highest single turbidity measurement	0.3 NTU	0.05	No	Soil Runoff
2) Percentage of samples less than 0.3 NTU	95%	100%	No	Soil Runoff

Turbidity is a measure of the cloudiness of the water, an indication of particulate matter, some of which might include harmful microorganisms. Low turbidity in Metropolitan’s treated water is a good indicator of effective filtration. Filtration is called a “treatment technique” (TT). A treatment technique is a required process intended to reduce the level of contaminants in drinking water that are difficult and sometimes impossible to measure directly.

**2015 CITY OF SIERRA MADRE UNREGULATED CHEMICALS REQUIRING MONITORING**

Chemical	Notification Level	PHG or (MCLG)	Average Groundwater and Surface Water Amount	Range of Detections	Most Recent Testing
Chlorate (ppb)	800	n/a	67	ND - 130	2013
Chromium, Hexavalent (ppb) <sup>[5]</sup>	MCL = 10	0.02	0.55	ND - 1.4	2013
Chromium, Total (ppb) <sup>[6]</sup>	MCL = 50	(100)	0.19	ND - 0.39	2013
Estriol (ppb)	n/a	n/a	<0.0008	ND - 0.0011	2013
Molybdenum, Total (ppb)	n/a	n/a	2.9	ND - 4.3	2013
Strontium, Total (ppb)	n/a	n/a	730	290 - 960	2013
Vanadium, Total (ppb)	50	n/a	4.2	2.7 - 6.6	2013

**2015 CITY OF SIERRA MADRE DISTRIBUTION SYSTEM WATER QUALITY**

Bacterial Quality	MCL	MCLG	Highest Monthly # of Positives	MCL Violation ?	Most Recent Sampling	Typical Source of Contaminant
Total Coliform Bacteria	1	0	0	No	Weekly	Naturally present in the environment

No more than one monthly sample may be positive for total coliform bacteria.

Chemical	MCL or (MRDL)	PHG or (MRDLG)	Average Amount	Range of Detections	MCL Violations?	Most Recent Sampling Date	Typical Source of Contaminant
Haloacetic Acids (ppb)	60	n/a	15	ND - 23	No	Quarterly	Byproducts of chlorine disinfection
Total Trihalomethanes (ppb)	80	n/a	37	24 - 51	No	Quarterly	Byproducts of chlorine disinfection
Chlorine Residual (ppm)	(4)	(4)	1.7	0.4 - 2.2	No	Weekly	Drinking water disinfectant
Fluoride (ppm)	2	1	0.84	0.8 - 0.9	No	Quarterly	Erosion of natural deposits
Color (Color Units) <sup>[2]</sup>	15	n/a	<3	ND - 25	No	Monthly	Naturally-occurring organic materials
Odor (threshold odor number) <sup>[2]</sup>	3	n/a	1	1 - 2	No	Monthly	Naturally present in the groundwater
Turbidity (NTU) <sup>[2]</sup>	5	n/a	0.6	ND - 5.4	No	Monthly	Erosion of natural deposits

At-The-Tap Lead and Copper Testing	Action Level	PHG	90th Percentile Value	Sites Exceeding Action Level	AL Violations?	Typical Source of Contaminant
Copper (ppm)	1.3	0.3	0.14	0 / 30	No	Corrosion of household plumbing
Lead (ppb)	15	0.2	ND	2 / 30	No	Corrosion of household plumbing

Every three years, 30 residences are tested for lead and copper at-the-tap. The most recent set of samples was collected in 2014. Lead was detected in two samples, both of which exceeded the lead AL. Copper was detected in 14 samples, none of which exceeded the copper AL. An AL is the concentration of a contaminant which, if exceeded in more than 10 percent of the samples, triggers treatment or other requirements that a water system must follow. The City of Sierra Madre complies with the Lead and Copper ALs.

#### 2015 CITY OF SIERRA MADRE UNREGULATED CHEMICALS REQUIRING MONITORING IN THE DISTRIBUTION SYSTEM

Chemical	Notification Level	PHG or (MCLG)	Average Amount	Range of Detections	Most Recent Testing
Chlorate (ppb)	800	n/a	92	64 - 120	2013
Chromium, Hexavalent (ppb) <sup>[5]</sup>	MCL = 10	0.02	0.83	0.16 - 1.5	2013
Chromium, Total (ppb) <sup>[6]</sup>	MCL = 50	(100)	0.85	ND - 1.7	2013
Molybdenum, Total (ppb)	n/a	n/a	3.4	3.2 - 3.6	2013
Strontium, Total (ppb)	n/a	n/a	630	390 - 860	2013
Vanadium, Total (ppb)	50	n/a	7.3	4.9 - 9.7	2013

[1] This table includes groundwater quality for water sampled at City of Sierra Madre's wells and tunnel.

Results are from the most recent testing performed pursuant to state and federal drinking water regulations.

[2] Chemical is regulated by a secondary standard to maintain aesthetic qualities (taste, odor, color).

[3] Aluminum has primary and secondary standards.

[4] A treatment technique is a required process intended to reduce the level of contaminants in drinking water that are difficult and sometimes impossible to measure directly.

[5] Hexavalent chromium was included as part of the unregulated chemicals requiring monitoring.

[6] Total chromium is regulated with an MCL of 50 ppb but was not detected, based on the detection limit for purposes of reporting of 10 ppb.

Total chromium was included as part of the unregulated chemicals requiring monitoring.

#### FLUORIDE VARIANCE

The City of Sierra Madre has been granted a Fluoride Variance from DDW. The City of Sierra Madre first requested the variance in 1994. On June 6, 1995, DDW conducted a public hearing in the City of Sierra Madre to determine if there was substantial public opposition to the City receiving a variance from the California drinking water standard for fluoride. DDW found that there is not substantial community opposition to the City receiving the variance from the California drinking water standard for fluoride.

In the meantime, DDW has raised the MCL for fluoride to 2 ppm with a PHG of 1 ppm. In 2015, the City on an average did not exceed the PHG of 1 ppm and the MCL of 2 ppm in water delivered to our customers. It should be noted that due to the fluoride concentration of our water, additional fluoride products are not necessary for children.

MCL = Maximum Contaminant Level;

MCLG = Maximum Contaminant Level Goal;

MRDL = Maximum Residual Disinfectant Level;

MRDLG = Maximum Residual Disinfectant Level Goal; ;

NL = Notification Level; n/a = not applicable;

ND = not detected;

NTU = nephelometric turbidity units;

PHG = California Public Health Goal;

ppb = parts-per-billion;

ppm = parts-per-million;

ppt = parts-per-trillion;

TT = Treatment Technique;

µmho/cm = micromho per centimeter;

pCi/L = picoCuries per liter;

< = detected but average is less than the required reporting limit