

Waterworks Advisory Committee
Cross-Connection Control Subcommittee
Meeting Summary

Sydnor Hydro, Inc., 2111 Magnolia St, Richmond, Virginia 23223

Wednesday, March 4, 2020

Draft

Present: Tom Faber, James City Service Authority, Virginia Chapter of the American Backflow Prevention Association; Steve Herzog, Virginia Water Environment Association and Hanover County; Bob Edelman, Director of Technical Services, ODW; Dwayne Roadcap, Director, ODW; Skip Harper, Master Plumber, Va Plumbing and Mechanical Association, DHCD; Russ Navratil, Henrico County, representing Virginia Section American Water Works Association

Introductions

Bob Edelman, ODW's Director of Technical Services led the meeting. Bob called the meeting to order. Attendees provided brief introductions.

Review charter and objectives

Bob Edelman briefly summarized the charter and objectives for the subcommittee. The group made no comments or requests for changes to the charter and objectives. Bob explained that meeting objective is to gather high-level information from the subgroup, rather than focus on regulatory language. VDH will take responsibility to translate concepts into regulatory language. VDH wants this group to recommend a revised proposal for cross connection control to the bigger WAC, to replace the current proposal.

VDH clarified that not all comments to the proposed amendments to the Waterworks Regulations came through the Regulatory Town Hall. Comments from Fairfax Water, Loudoun Water, and EPA did not come through the Town Hall, but did not include comments related to cross connection control. All the comments are contained in the minutes posted on the Town Hall for the February 19, 2020 WAC meeting.

VDH clarified that hydrants, including fire hydrants are not in the scope of this subcommittee and another subcommittee is working on this. David Van Gelder and Steve Edgemon are working on collecting information from hydrant manufacturers.

Establish issues and share perspectives

Skip Harper shared a copy of the current memorandum of understanding between VDH and DHCD, dated December 2013. The jurisdiction of the Uniform Statewide Building Code (USBC) begins at the point of demarcation, which is just after the water meter, or when there is no water meter, at the point of connection to the waterworks main. The jurisdiction of the Waterworks Regulations ends at the point of demarcation.

- The USBC applies to devices after the water meter, including devices on residential lawn irrigation systems.
- The USBC requires annual testing of testable devices.

- The USBC does not require that device owners report test results.
- Some, but not all, local building officials are telling device owners that testing is required, reminding owners, and tracking if testable devices are actually tested. In many cases, local building officials don't know if owners are testing devices.
- Devices required under Section 610 of the Regulations are for containment and are within the jurisdiction of the USBC. This is a subset of the total devices installed under the USBC.
- It's not the intent of the proposed amendments to remove the requirement for annual testing of devices.

Tom Fauber reviewed the program history. Major points:

- Current standards communicated through training classes and working memos calls for an inventory of all devices and tracking annual testing.
- SDWA includes a responsibility for safe water, and this includes a responsibility to require and ensure that annual testing of devices is completed by the device owners.
- Waterworks owners have a responsibility to inventory devices and confirm that testing is completed.
- The language in 600 D "Instead of annual operational tests (12VAC5-590-600 C) and the related records and inventory of backflow prevention assemblies, backflow elimination methods..." is misleading because it gives the reader the impression that testing is not required.

Steve Herzog stated his position:

- Likes the balance of power between VDH and Waterworks in the current regulations. The proposed amendments give VDH too much power.
- The community should have flexibility to decide if to require inventory and tracking of certain devices by the waterworks. Hanover County does not maintain an inventory of testable devices at residences and does not track testing of these devices. ODW approved the Hanover County CCC Plan and therefore, it meets the current Waterworks Regulations.
- Hanover is not aware of any water quality or backflow problems related to residential backflow events and the current practice of not tracking inventory and testing of residential devices.
- Hanover is currently tracking 1,500 devices for containment at nonresidential facilities. This costs approximately ½ FTE.
- Chesterfield County attempted to inventory and track testing of all testable devices. Steve heard that there were problems with this effort. Contact George Hays in Chesterfield for more information.
- Public education is ok for things that are not high hazard. At one point, a draft of the Regulations left irrigation systems to the waterworks to make a determination if it is high hazard. ODW needs to decide on this issue.

Bob Edelman asked: In the universe of homes, especially single-family residences, some have testable devices, and some do not. How would a water system or building inspector know something has changed, specifically, a sprinkler system is installed or removed?

Responses:

- The homeowner is supposed to pull a plumbing permit, which is how Hanover would know. There is no requirement for a plumbing permit if the homeowner removes the sprinkler system.

- At James City County, in 2008, many residents requested an irrigation sub-meter to avoid the sewer charge on irrigation water, and that's how many the irrigation systems and associated devices were identified.
- The James City program started with 7,000 irrigation systems with testable devices and 39% of devices failed tested initially. Currently, the program has over 13,000 irrigation systems and a current failure rate of 15%. Irrigation systems are all considered high hazard due to popup sprinkler heads and possible chemical injection.
- Hanover staff visit each meter at least once per year and are in the neighborhoods, looking at what's going on. This presence in the neighborhoods helps Hanover to identify problems.

Skip provided additional clarification:

- Suggested removing, "Instead of annual operational tests..."
- Suggest referencing the section of USBC that require annual testing for clarity : the 2015, Virginia Plumbing Code, is for new construction, the Virginia Property Maintenance Code has same language.
- Reduced pressure zone assembly is recognized for both high hazard and low hazard applications.

Summary of Input

1. Make it clear annual testing is required for all testable devices.
2. Remove "Instead of annual operational tests..."text and focus on clarifying Section 600 D.
3. The waterworks owner is best equipped to decide on resources more than the minimum standard to protect public health. ODW will decide the minimum requirement for inventory and tracking.
4. May not need public education given that VDH is going to make it clear and explicit that annual testing is required.
5. Public education is only acceptable for non-high hazard situations.
6. Leave "Buildings with commercial, industrial, or institutional occupants served through a master meter" on the list at 610 E.
7. Leave "Highrise buildings (four or more stories)" on the list at 610 E as it reads in the current Regulations.

Bob stated that ODW will digest input from this meeting and share proposed revised language to the group with a goal of Friday, March 13. Subgroup members are free to share the proposal with their constituents as necessary to support decision making and responding to ODW.

Next Meeting

Meet at Henrico Water Treatment Plant on 3/18/20, 9 -11 am, 10111 Three Chopt Road, Henrico. Bob will send meeting invites, agenda and a proposal in advance.