Backflow PreventionRule Update

Water Distribution Systems Workshop December 10, 2014

Maria Lucente, P.E. Ohio Environmental Protection Agency Division of Drinking and Ground Waters



Backflow PreventionRule Update

- OVERVIEW OF BACKFLOW PREVENTION AND CROSS CONNECTION CONTROL CONCEPTS
- REGULATORY OVERVIEW AND UPDATES ON PROPOSED RULE REVISIONS
- OVERVIEW OF REVISIONS PROPOSED TO OHIO EPA'S BACKFLOW PREVENTION MANUAL

Is About Protecting Our Public Water Supply



CROSS- CONNECTION

Physical link or route that makes it possible for contamination to flow into the potable water system

BACKFLOW

Flow of water or other liquids, mixtures, or substances into the distributing pipes of a potable water supply from any source other than the intended source of the potable water supply.



BACKSIPHONAGE -

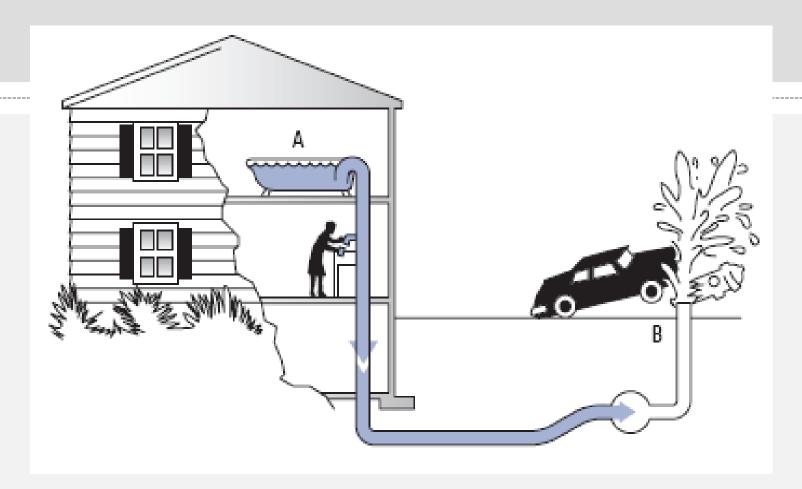
Reversal of flow due to negative gauge pressure condition in the piping allowing contaminants to be siphoned into the drinking water supply

BACKPRESSURE -

Reversal of flow due to an opposing pressurized system which overcomes the public drinking water supply pressure allowing movement of contaminants into the drinking water supply

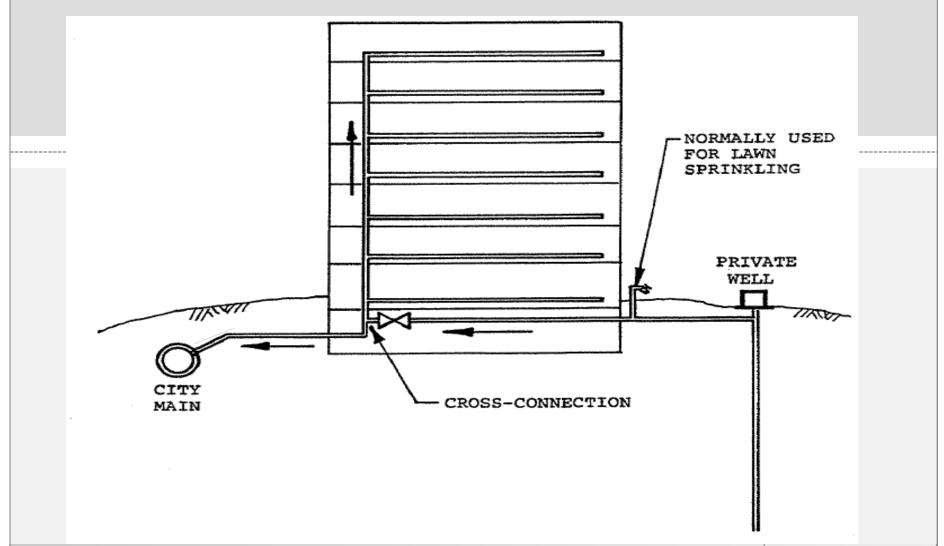


Backsiphonage





Backpressure





Environmental Protection Agency

CONTAINMENT PRINCIPLE -

The installation of a backflow prevention assembly on the consumer's service line (typically at meter) to protect contaminants from backflowing into the public water distribution system.

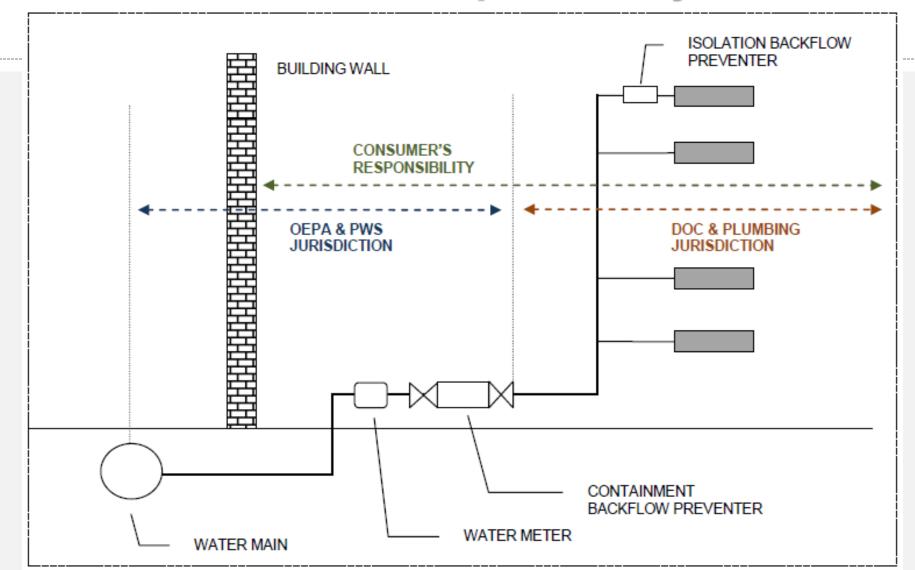
OEPA/ water supplier jurisdiction

ISOLATION PRINCIPLE -

The installation of individual fixture devices or "air gaps" which isolate the cross-connection at the possible source of contamination to protect the consumer's potable water supply ODOC/local plumbing authority jurisdiction



Shared Responsibility





Environmental Protection Agency

INCIDENCES

•FEBRUARY 2004 - CENTRAL OHIO

Turbid water led to company officials discovering a crossconnection between the public water supply and a coolant line that drew water from holding ponds

OCTOBER 2004 - NORTHEAST OHIO

Residents were instructed to use bottled water after the village public water system was contaminated with fertilizer from a tanker truck cross connection with a fire hydrant



OBJECTIVE

Comprehensive backflow prevention and cross-connection control program to address backflow hazards posed by cross-connections in plumbing systems and to public water supplies

RESPONSIBILITY

Shared among regulatory agencies, supplier of water, local plumbing authorities and the consumer



STATE OF OHIO RULES AND REGULATIONS PERTAINING TO BACKFLOW PREVENTION AND CROSS-CONNECTION CONTROL

Ohio EPA Legal Authority

Ohio Revised Code:

Sections 6109.13, 6109.07, 6109.04

Ohio Administrative Code:

Chapter 3745-95 (95-01 to 95-09)



Backflow Prevention Rules

Proposed changes:

Ohio Administrative Code 3745 -95-01

-95-02

-95-03

-95-05

-95-06

-95-07

These changes will go out for public comment again. *Not effective yet*.

Access draft rules on OEPA website.

Rules and Effective Dates

Chapter 3745-95: Backflow Prevention and Cross-Connection Control

- 3745-95-01 (19 April 2012) Definitions.
- 3745-95-02 (1 May 2003) Cross-connections.
- 3745-95-03 (26 November 1980) Surveys and investigations.
- 3745-95-04 (1 May 2003) Where protection is required.
- 3745-95-05 (1 May 2003) Type of protection required.
- 3745-95-06 (1 May 2003) Backflow prevention devices.
- 3745-95-07 (8 August 2008) Booster pumps.
- 3745-95-08 (26 November 1980) Violations.
- 3745-95-09 (19 April 2012) Requirements for yard hydrants



Environmental Protection Agency

CHAPTER 3745-95-01- DEFINITIONS

Add definition for <u>containment</u> principle

CONTAINMENT PRINCIPLE BACKFLOW PREVENTER -

Installed in a consumer's water system, to contain water within the premises, to prevent polluted or contaminated water from backflowing into the public water system.

Typically at service connection, unless placement otherwise specified in rule. Protect public water system supply.

VS. ISOLATION -

Protect the consumer's potable water supply



CHAPTER 3745-95-01- DEFINITIONS (CON'T)

- Change backflow prevention <u>device</u> to backflow <u>preventer</u>
- Add definition for pressure vacuum breaker

Revisions being made to be consistent with terms used in backflow prevention manual and in practice.

CHAPTER 3745-95-02- BACKFLOW PREVENTION AND CROSS CONNECTION CONTROL

Add statement that PWSs must have a backflow prevention program consistent with these rules.



CHAPTER 3745-95-03 - SURVEYS AND INVESTIGATIONS

- Set a frequency for periodic survey or investigation
- Rule language drafted among interested party group (small and large PWSs and ODOC-plumbing & building standards)

Proposed Rule language:

- Conduct an <u>initial assessment</u>
- Conduct <u>periodic surveys or investigations</u> of <u>water use</u> <u>practices within a consumer's premises</u>
- DETERMINE WHETHER THERE ARE ACTUAL OR POTENTIAL CROSS-CONNECTIONS TO THE CONSUMER'S WATER SYSTEM THROUGH WHICH CONTAMINANTS OR POLLUTANTS COULD BACKFLOW INTO THE PUBLIC WATER SYSTEM.



CHAPTER 3745-95-03 - SURVEYS AND INVESTIGATIONS

Proposed Rule language (con't):

TO MEET RESURVEY REQUIREMENT, THE SUPPLIER OF WATER MUST: Conduct <u>onsite investigation of all premises every five years</u> to identify changes in water use practices that require mitigation **OR**.

Identify in writing, develop and <u>implement</u>, an <u>alternate</u>, <u>ongoing methodology</u> to identify changes in water use practices at the consumer's property so that new or increased hazards to the water supply are identified and mitigated.



CHAPTER 3745-95-03 - SURVEYS AND INVESTIGATIONS

Proposed Rule language (con't):

Alternate written process must specify that:

AN <u>ON-SITE INVESTIGATION</u> IS REQUIRED WHEN A NEW OR INCREASED HAZARD IS SUSPECTED TO CONFIRM DEGREE OF RISK AND HOW IT WILL BE ADDRESSED.



CHAPTER 3745-95-03 - SURVEYS AND INVESTIGATIONS

Proposed Rule language (con't):

Process includes how on-going information will be obtained and used, such as:

<u>INFORMATION OBTAINED</u> THROUGH A WATER USE SURVEY <u>QUESTIONNAIRE</u> OR IN <u>COORDINATION WITH THE LOCAL</u> BUILDING, ZONING, HEALTH, AND OTHER LICENSING AGENCIES MAY BE <u>USED</u> <u>AS AN INDICATOR</u> OF WHEN AN <u>INVESTIGATION</u> SHOULD BE CONDUCTED.

OTHER TRIGGERS SUCH AS A REQUEST TO THE SUPPLIER OF WATER FOR A NEW OR ADDITIONAL SERVICE LINE OR AN ADDITIONAL OR LARGER METER SHOULD WARRANT AN INVESTIGATION.



CHAPTER 3745-95-03 - SURVEYS AND INVESTIGATIONS

Proposed Rule language (con't):

IN LIEU OF CONDUCTING A SURVEY OR INVESTIGATION OF EACH RESIDENTIAL PREMISES WITHOUT A LIKELY HAZARD, THE SUPPLIER OF WATER MAY INSTITUTE AN ON-GOING EDUCATIONAL CAMPAIGN TO INFORM CONSUMERS OF COMMON BACKFLOW HAZARDS CREATED DURING RESIDENTIAL WATER USE AND PROVIDE A REPORTING MECHANISM FOR SUSPECTED CROSS CONNECTIONS.

AN EDUCATION CAMPAIGN MAY USE LOCAL MEDIA AND ADVERTISING RESOURCES, BUT MUST ALSO INCLUDE INFORMATION DELIVERED, EITHER ELECTRONICALLY OR HARD COPY, TO EACH RESIDENTIAL SERVICE CONNECTION AT LEAST ANNUALLY.

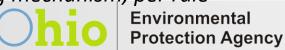


Environmental Protection Agency

CHAPTER 3745-95-03 - SURVEYS AND INVESTIGATIONS

Summary:

- Conduct onsite investigation every 5 years (industrial, commercial, institutional and at-risk residential premises);
 Apply residential educational campaign with reporting mechanism for cross connections.
- Written process that is performance-based, utilizes ongoing collection of information and built on triggers:
 - Collaborate with local permitting authorities (building, plumbing, health, fire)
 - Send out survey questionnaires to collect information on water use practices
 - Act on requests for new or additional service line or additional/larger meter
 - Apply residential educational campaign and reporting mechanism, per rule



CHAPTER 3745-95-05 - TYPE OF PROTECTION REQUIRED

Include alternative for water-only, residential irrigation system:

WATER-ONLY, RESIDENTIAL-TYPE IRRIGATION SYSTEM

- -Not Subjected To Backpressure
- -No Additives

AN APPROVED PRESSURE VACUUM BREAKER CAN BE USED TO ISOLATE THE SERVICE LINE TO THE IRRIGATION SYSTEM IN LIEU OF INSTALLING A CONTAINMENT ASSEMBLY AT THE SERVICE CONNECTION.

-Same Maintenance And Testing Requirements
CAN STILL REQUIRE CONTAINMENT PROTECTION AT THE
SERVICE CONNECTION



CHAPTER 3745-95-06 - BACKFLOW PREVENTION DEVICES

Update standards references for acceptable backflow prevention assemblies.

Refer to those in Ohio Building Code-Plumbing Rule, where applicable, so keep consistency in standard edition. Add PVB.

Specify records retention:

- THE SUPPLIER OF WATER SHALL MAINTAIN AN INVENTORY OF SURVEY, INVESTIGATION AND BACKFLOW PREVENTION DEVICE INSTALLATIONS.
- <u>RECORDS</u> OF INSPECTIONS, <u>TESTS</u>, REPAIRS AND OVERHAULS SHALL BE MAINTAINED BY THE SUPPLIER OF WATER FOR A MINIMUM OF <u>FIVE YEARS</u>.



CHAPTER 3745-95-07 - BOOSTER PUMPS

Modifications requested by Board of Building Standards & Ohio Dept. of Commerce-Plumbing; State Fire Marshal; and, Fire pump supplier.

- Allow install at 1,2 and 3 family dwellings with minimum suction pressure control. Plumbing will require condition of obtaining a certificate of occupancy, based on notification to PWS of pump install and successful testing of the low pressure cut-off.
- Incorporate variable speed suction limiting control as alternate minimum suction pressure control mechanism on fire pump installations.
- Changes are consistent with Ohio Building Standards (plumbing) and State Fire Code (NFPA 20 standards for fire pumps).



CHAPTER 3745-95-07 - BOOSTER PUMPS

Summary:

- Lift prohibition on 1,2 and 3 family dwellings. Plumbing will require low pressure cut-off and notify PWS of pump install and initial test result.
- Continue to recommend address low pressure problem areas through distribution fixes, rather than individual premises fixes
- Fire pumps have two options now:
 - Low suction throttling valve set to maintain 10 psi or more at suction side of pump
 - Variable speed suction limiting control which reduces pump speed to maintain pressure at 10 psi or more at suction side of pump



Backflow
Prevention and
Cross Connection
Control Manual,
Third Edition 1987,
Revised 1990.

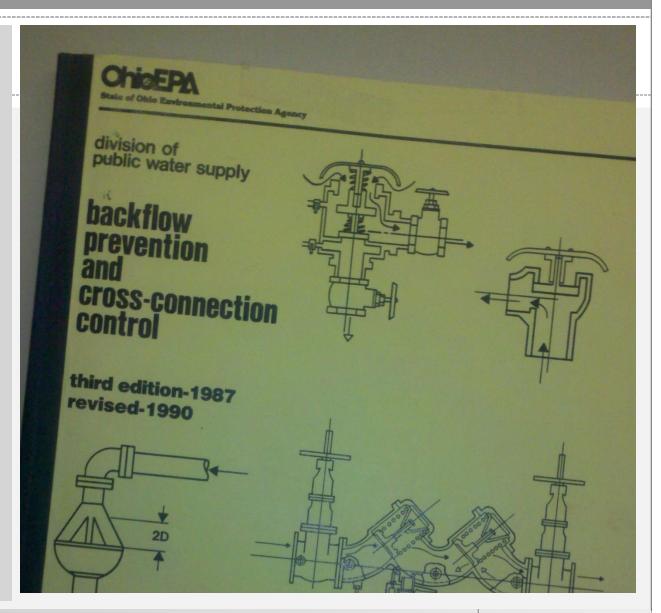
Manual Revisions:

Rule Changes

New Policy

New Guidance

COMING SOON!





Revisions to OEPA Backflow Prevention Manual

- 1. Rearranged material and added a section to the Manual
- 2. Addressed reoccurring/hot topics and guidance developed since last revision.
- 3. Added Pictures and Illustrations
- 4. Updated test procedures and forms. Made consistent with ODOC-Plumbing
- 5. Updated rules and regulations
- 6. Expanded Appendices (to include supporting information and referenced guidance documents)

Major Sections of BFP Manual (Revised)

- 1. The Problem
- 2. Backflow and Cross-Connection Theory and Concepts
- 3. Cross-Connection Control Program Authority and Rules
- 4. Backflow Preventers (types)
- 5. Degree of Hazard and Methods for Control
- 6. Components of a Backflow Prevention Program

Appendices (supporting information and guidance)



Backflow Preventers

Air Gap

- Air gap discharge
- Bulk water loading station air gap device

Assemblies

- Reduced Pressure Principle Backflow Prevention Assembly
- Reduced Pressure Detector Check Assembly
- Double Check Assembly
- Double Check Detector Check Assembly

Devices

- Dual Check
- Hose Bibb Vacuum Breaker
- Atmospheric Vacuum Breaker
- Pressure Vacuum Breaker
- Specific Valving/ Piping Configuration
 - Interchangeable Connection (four-way valve or swing connector)
 - Barometric Loop



Degree of Hazard & Methods for Backflow Prevention and Cross-Connection Control

PROTECTION NEEDED FOR THE DEGREE OF HAZARD

Severe Health Hazard

Cause severe morbidity or death

Health Hazard

Danger to health

System Hazard

Cause damage to components of water system

Pollution hazard

Aesthetically objectionable or degrading to quality of water



Environmental Protection Agency

Degree of Hazard & Methods for BFP and X-Conn. Control

Hazard Level	<u>Assembly</u>	Certification Number	Protection Provided
Severe Health	Approved Air-Gap Separation	ANSI 112.1.2	Backpressure Backsiphonage
Health System	Reduced Pressure Assembly	ASSE 1013 AWWA C511 CSA B64.4 USC - RP	Backpressure Backsiphonage
Health System (Fire System Only)	Reduced Pressure Detector Assembly	ASSE 1047 CSA B64.4.1 USC - RPDA	Backpressure Backsiphonage
Pollution	Double Check Valve Assembly	ASSE 1015 AWWA C510 CSA B64.5 USC - DCA	Backpressure Backsiphonage
Pollution (Fire System Only)	Double Check Detector Assembly	ASSE 1048 CSA B64.4.1 USC -DCDA	Backpressure Backsiphonage
Health (Residential Irrigation with no additives only*) *conditional	Pressure Vacuum Breaker	ASSE 1020	Backsiphonage Only

Degree of Hazard & Methods for Backflow Prevention and Cross-Connection Control

SPECIFIC WATER USE PRACTICES OF CONCERN:

AUXILIARY WATER SYSTEMS

FIRE PROTECTION

BOOSTER PUMPS

DUAL WATER SUPPLIES

PLUMBING SYSTEMS

MISC. HAZARDS

(water-operated devices, yard hydrants, geothermal, gray water)



Environmental Protection Agency

Degree of Hazard & Methods for BFP and X-conn Control

AUXILIARY WATER SYSTEMS (AWS)

- Physically separate & require a reduced pressure principle backflow prevention assembly (RP) at the service connection, or eliminate AWS.
- If on property, off premises, no risk of crossconnection of public water system with AWS, could implement alternative to RP
 - Outlined in rule and guidance provided in implementing this alternative



Degree of Hazard & Methods for BFP and X-conn Control

BOOSTER PUMPS

- Incorporate rule changes
- No prohibition for 1,2,3 family dwellings.
 - Must apply low pressure cut-off requirement
- Update test procedure for low suction throttling valve and variable speed suction limiting control for fire pump applications



Degree of Hazard & Methods for BFP and X-conn Control

YARD HYDRANTS, with below ground weep holes:

- Publically owned/part of public water system, weep holes prohibited when accessible/intended for potable use (i.e. campgrounds)
- Owned/part of public water system, and <u>not</u> for potable use, or on private service connection, must install appropriate bfp assembly.
 Label not for human consumption or nonpotable.
- Recommend ASSE 1057 freeze resistant sanitary yard hydrant

•RWH OR GRAY WATER SYSTEMS

- Physical separation of two systems
- Make up water line to a storage tank with air gap discharge
- RP at meter or alternately, on service line to tank.



QUALIFICATIONS FOR PROGRAM OVERSIGHT & TESTING OF BACKFLOW PREVENTERS

OEPA SANITARY SURVEY CHECKLIST USED TO DETERMINE ADEQUACY OF BFP PROGRAM



QUALIFICATIONS (PROGRAM OVERSIGHT & TESTING)

THE INDIVIDUAL:

- Overseeing the program must be the operator of record or under his/her authority
- Implementing the program should have completed a training course about backflow prevention theory and testing procedures
- Testing containment assemblies should have ODOC tester certification
- Testing isolation devices must follow ODOC requirements
- Testing backflow prevention assemblies on fire protection system may need certification from State Fire Marshal



SANITARY SURVEY CHECKLIST TO DETERMINE ADEQUACY OF BACKFLOW PREVENTION PROGRAM

COMPONENTS OF A GOOD BACKFLOW PREVENTION PROGRAM:

- Local ordinance or other legal mechanisms in place to control cross-connections
- Backflow preventer required is appropriate for degree of hazard
- 3. Backflow preventers are inspected/tested every 12 mos.
- 4. Discontinue service when backflow preventer not installed or properly maintained



SANITARY SURVEY CHECKLIST TO DETERMINE ADEQUACY OF BACKFLOW PREVENTION PROGRAM

- 6. Minimum pressure sustaining controls maintained for booster and fire pump installations drawing from public water supply
- 7. Service connections with auxiliary water systems have physical separation and backflow preventer; or follow requirements of OAC 3745-95-04(C)(2)
- 8. Has a criteria for acceptable backflow prevention device tester
- Backflow prevention needs for all existing customers have been identified



SANITARY SURVEY CHECKLIST TO DETERMINE ADEQUACY OF BACKFLOW PREVENTION PROGRAM

- 10. Mechanism in place to identify backflow prevention needs on new service connections
- 11.Periodic resurvey, as defined in rule, of all consumers to determine current water use practices and that adequate protection is in place
- 12.Backflow preventers at treatment plants and other facilities owned by water system/municipality tested every 12 mos.
- 13. Air gap provided at bulk water sale stations
- 14. Trained PWS staff in cross connection control



Appendices

LISTING OF STATE OF OHIO LAWS AND RULES PERTAINING
TO BFP AND X-CONN CONTROL

SUGGESTED LANGUAGE FOR LOCAL ORDINANCES & REGULATIONS

PROCESS OF APPROVING BACKFLOW PREVENTERS BY RULE

INSPECTION, TESTING AND MAINTENANCE PROCEDURES FOR BACKFLOW PREVENTERS

OHIO EPA GUIDANCE DOCUMENTS REFERENCED IN MANUAL



For More Information

Maria Lucente, P.E.
Engineering, Loans and Operations Section
DDAGW
(614) 728-1231 phone
maria.lucente@epa.ohio.gov

See website for current draft rule and manual:

http://epa.ohio.gov/ddagw

Rules Link Interested Party Review Tab

Sign up for rule notification emails: ohioepa.custhelp.com/ci/documents/detail/2/subscriptionpage

Proposed changes expected to be filed for a second round of interested party review in January 2015 time frame.

THANK YOU!

