What are we doing?

Washington State has a long history of developing strong, collaborative drinking water programs to protect public health. The Cross-Connection Control (CCC) program is an excellent example of this collaboration. The CCC program helps ensure that Public Water Systems (PWS) deliver high quality water to their customers.

To better protect public health, drinking water rules require public water systems to utilize a Cross-connection Control Specialist (CCS) to develop and implement CCC programs. WAC 246-292 (Operator Certification Rule) is consistent with WAC 246-290-490 (Cross-Connection Control) in requiring PWS's to designate a CCS to be in responsible charge of a public water system's CCC program.

Operator Certification Program staff currently track required Water Treatment Plant Operators (WTPO) and Water Distribution Managers (WDM) for each PWS. Historically, the Department of Health (DOH) has not tracked the designated CCS for a PWS; however, this will change. Now PWS's must designate a certified CCS at their water system.

Who is the CCS?

The potable water distribution system is a physical barrier from drinking water contamination and the CCS helps ensure that contaminants do not enter the distribution system from cross-connections. A cross-connection is a point where the potable water supply is, or could be, connected to a non-potable source. Contaminants can enter the distribution system through uncontrolled cross-connections when backflow occurs.

The key to a successful CCC program is your certified CCS.

WAC 246-292-033 lists the duties required by the CCS. These tasks include:

- Develop, implement, and maintain a CCC program,
- Assess the degree of hazard posed by the consumer's water system,
- Determine the appropriate backflow protection for each customer,
- Inspect backflow assembly and air gap installations,
- Develop and maintain CCC records, and
- Take corrective actions in the event of a backflow incident...

Why is CCC important?

The Center for Disease Control data indicates CCC deficiencies account for approximately 50 percent of all distribution-related waterborne disease outbreaks. Though our drinking water rules require PWS's to report backflow incidents, DOH isn't receiving all of them. With new metering and Supervisory Control and Data Acquisition (SCADA) technologies, it is likely the perceived occurrence of backflow incidents will increase. The Revised Total Coliform Rule will

also require operators to investigate and report the cause of coliform failures. This will also likely increase the number of reported backflow incidents.

Backflow incidents potentially cost the PWS in:

- The health of PWS customers.
- Investigations and clean-up.
- Litigation, if someone suffers a loss.

When do I need a CCS?

Although the CCS requirement existed since the 1970s; we clarified the requirement in the 2014 revision of the OpCert Rule (WAC 246-292). We plan to implement the CCS requirement over the next two years to minimize the impact on smaller water systems.

Our implementation plan will include the following.

- Making PWS's aware of the importance of the CCS.
- Informing PWS's of our intention of tracking their designated CCS.
- Giving PWS's some options to meet this requirement, such as:
 - Contract with a CCS.
 - o Work with a neighboring PWS or a Satellite Management Agency (SMA).
 - Have an existing operator for the PWS become CCS-certified.

Most small PWS's need a CCS for only a few hours a month after the initial CCC program development. The advantage of working with a contract CCS, neighboring PWS, or SMA is that the CCS will likely have more experience than an on-staff person and be able to perform the necessary duties more quickly. However, the disadvantage of a non-staff CCS is that they may not be as readily available as an on-staff person and will require a robust service contract. Some advantages of having an on-staff CCS are, 1) the current system operator is likely eligible to take the CCS certification exam; 2) CCS certification meets the professional growth requirement for other operator certifications; and 3) there is no need to search for the "right" person for your system because they are available full time.

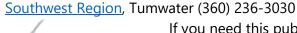
PWS's that haven't reported a designated CCS by January 1, 2019, will enter the compliance process used for other mandatory operator positions and will be subject to potential formal enforcement.

For More Information

Our publications are online at http://www.doh.wa.gov/drinkingwater.

Contact our nearest regional office from 8 a.m. to 5 p.m. Monday through Friday. If you have an after-hours emergency, call (877) 481-4901.

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