

NORTH IDAHO REGIONAL WATER PURVEYORS

REPRESENTING NORTH IDAHO PUBLIC DRINKING WATER SYSTEMS IN CROSS CONNECTION CONTROL & BACKFLOW ASSEMBLY TESTING

Mr. Lance Nielsen
Drinking Water Program Manager
Idaho Department of Environmental Quality
1410 N Hilton
Boise, ID 83706

October 25, 2011

Dear Mr. Nielsen,

The North Idaho Regional Water Purveyors is a group of local public drinking water purveyors formed to provide support and assistance in the development and implementation of cross connection control programs for public water systems, large and small. The group meets monthly to review and discuss issues with cross connection control programs, backflow assembly testing, development of educational materials and program implementation challenges.

One of the predominant issues we struggle with is a lack of purveyor authority under the Idaho Rules for Public Drinking Water Systems (IDAPA 58.01.08) with regard to timely notification of failed and/or untestable assemblies to the purveyor by licensed backflow assembly testers. The lack of timely notification presents a significant threat to our ability to protect the public health, our number one priority in regards to cross connection control. There is also a significant problem with testers walking away from failed assemblies without attempting repairs as well as not submitting test reports to the purveyor in a timely manner.

As you know, backflow assemblies must remain operational to protect the potable supply from cross connection contamination from low and high health hazards. IDAPA 58.01.08, Sections 543 and 552 do not require that a backflow assembly tester provide the public water system with timely notification of a backflow assembly test failure where the assembly has not or cannot be repaired and retested for compliance. It is often several weeks before the tester will submit a failed test report. The Rules also do not require a backflow assembly tester to attempt immediate repairs and retesting of failed assemblies. With the lack of such requirements in the Rules, we often find that it is difficult to engage councils and/or boards to enforce any such requirements by ordinance or policy.

The **North Idaho Regional Water Purveyors** respectfully request that language be added to IDAPA 58.01.08, Sections 543 and/or 552 requiring notification of a failed backflow assembly to be submitted to the public water system within 24 hours of a failed test where the assembly cannot immediately be repaired, perform a passing retest and restored to service. If failure occurs outside of a purveyor's regular business hours or the purveyor cannot be immediately contacted, it will be the tester's responsibility to adequately isolate the known hazard.

Additionally, **all** backflow assembly test reports will be submitted to the public water system within a maximum of 30 days from the date of the initial performance test. We would also request consideration of language specifying that a backflow assembly tester will not abandon a failed assembly without attempting repairs and retesting or without immediate notification to the public water system.

In closing, the Idaho Rules for Public Drinking Water Systems delegate the responsibility for implementation of cross connection control programs to the purveyor. One of the greatest threats to the safety of our water supplies is unprotected cross connections. In order to adequately protect the public health, additions to current regulations are necessary. This will provide purveyors the authority to prevent unprotected cross connections from contaminating our water supplies.

Please consider these proposed language changes in the upcoming Rulemaking Session. Please let me know if you have any questions or require further information. I can be contacted at 208-769-2210 or by email at tpickel@cdaid.org. Thank you for your time and attention.

On behalf of the North Idaho Regional Water Purveyors,

Terry W. Pickel
Assistant Superintendent
Coeur d'Alene Water Dept.