

Paula Wilson

From: Tim Lochrie <timl@postfallsidaho.org>
Sent: Tuesday, December 06, 2011 4:55 PM
To: Paula Wilson
Subject: Public Drinking Water Systems: Negotiated Rulemaking

December 6, 2011

My comments concern Docket No. 58-0108-1101, Draft No. 2, specifically 552.06c. and d. Cross Connection Control Program.

The City of Post Falls began the cross connection control program in 1997. Currently we are tracking 3,535 accounts with 4,253 assemblies that are required to be tested with a report submitted annually to the City.

Ethical backflow assembly testing practices cause us the greatest concern for our customers. Testers will charge customers \$300.00 for the installation of a new backflow assembly when cleaning the internal components or installing a \$40.00 rubber repair kit would have resulted in a passing final backflow assembly test. Fire sprinkler contractors locally are hired to test, not repair the assembly. A bid is submitted for repairs and the customers then decide how to proceed. Meanwhile their fire sprinkler system, filled with water of unknown quality poses a threat to the public potable water supply. A local hospital was without premise isolation for seven weeks because their 4" reduced pressure backflow assembly failed the backflow test. The City was made aware of this when the company that did the test called to ask what company was hired to do the repair. At that time, the hospital was notified they had 48 hours to reestablish premise isolation or service to the premise would be terminated. This unacceptable and inexcusable practice is unaddressed by law.

Draft No. 2, 552-06-c currently reads: "Assemblies that cannot pass annual tests or those found to be defective shall be repaired or replaced within a time period determined by local ordinances."

A Licensed Backflow Assembly Tester should be required by law when upon obtaining unacceptable test results, to clean internal components as needed, retest and if necessary repair or replace the assembly immediately. If the assembly cannot be repaired or replaced immediately, water service to the failed assembly should not be restored. Any and all failed backflow assembly test reports must be submitted to the appropriate water purveyor within 24 hours if not repaired or replaced immediately. I urge you to address this issue at the State level making its implementation automatic at a Cross Connection Control Program level.

Draft No. 2, 552.06-d. currently reads: "Discontinuance of service to any structure, facility or premises where suitable backflow protection has not been provided for a cross connection."

At this point, we have moved from the "Tester" to the "Owner" of said assembly. Can we add to the existing sentence: "Failure and/or refusal to provide the annual backflow assembly test reports in accordance with the test procedures published by the U.S.C. Foundation for Cross Connection Control and Hydraulic Research."

Thank you for your time and consideration.

Sincerely,

Tim Lochrie
Cross Connection Control Coordinator

City of Post Falls
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