

South Central Connecticut Regional Water Authority
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Testimony to the Public Health Committee

**House Bill 5436 - AN ACT CONCERNING A REQUIREMENT FOR WATER COMPANIES TO CONDUCT
QUINQUENNIAL TESTS ON PRESSURE VACUUM BREAKERS**

March 16, 2012

The South Central Connecticut Regional Water Authority (SCCRWA) is a non-profit, public corporation and political subdivision of the State. Our mission is to provide our customers with high quality water at a reasonable cost while promoting the preservation of watershed land and aquifers. We provide approximately 50 million gallons of water per day to over 425,000 consumers in our region. The source of this water is a system of watershed and aquifer areas that cover about 120 square miles within 24 municipalities. More than 27,000 acres of these watershed and aquifer areas are protected as open space as a result of the Authority's efforts and efforts with partners. Within the 20 member towns of our water district, we own and operate a public water system, which includes 10 active reservoirs, 4 surface water treatment plants and 6 ground water treatment plants.

The South Central Connecticut Regional Water Authority, the public water utility serving 425,000 consumers in the greater New Haven area, has a number of concerns relative to HB 5436, **AN ACT CONCERNING A REQUIREMENT FOR WATER COMPANIES TO CONDUCT QUINQUENNIAL TESTS ON PRESSURE VACUUM BREAKERS**.

Water utilities are responsible for the protection of public health through active inspection of the drinking water distribution system to identify potential contamination sources resulting from back siphonage and back pressure associated cross connections. The SCCRWA conducts 2,500 annual inspections of customer premises in an effort to identify these cross connection conditions. Once identified, cross connections are most often mitigated through the installation of backflow prevention devices that fall into one of two general categories, *non-testable* for lower hazard applications and *testable* for high hazard applications. Considering the intent of a cross connection control program is to protect public health, it is critical to design and maintain an active and frequent device testing program to ensure proper device functionality. If the degree of hazard has been identified as one requiring a testable backflow device, it is equally important to make sure that device is providing protection as intended. The following agencies address testing frequencies:

- The Connecticut Department of Public Health requires annual testing of all testable backflow preventers, including Pressure Vacuum Breakers, as defined by the Connecticut Public Health Code Section 19-13B38(a)(f)(7).
- The American Water Works Association, Manual M14, Appendix B, Section 3.2.6 in its Model Ordinance recommends device testing "at least once per year".
- USEPA Cross Connection Control Manual, Chapter 7, Section X (A) within its Ordinance Provisions recommends annual testing.

The SCCRWA currently performs nearly 7,500 device tests annually. This effort typically results in a device failure rate of approximately 2% per year. If device testing frequencies are relaxed to a five year cycle, we would expect a 10% failure rate; in other words, 1 device in 10 would not be performing as intended and the risk to public health resulting from cross connection associated contamination would increase substantially. We see this as an unacceptable risk to our consumers and one that is easily avoided by compliance with existing regulation.

Thank you for considering the Regional Water Authority's comments. Please do not hesitate to contact the Authority's Manager of Water Quality, Thomas C. Barger, at 203-401-2710 or tbarger@rwater.com.