



STATE OF CONNECTICUT

DEPARTMENT OF PUBLIC HEALTH

TESTIMONY PRESENTED BEFORE THE PUBLIC HEALTH COMMITTEE

March 16, 2012

Ellen Blaschinski, Branch Chief, Regulatory Services Branch 860-509-8171

House Bill #5436 – AAC A Requirement For Water Companies to Conduct Quinquennial Tests On Pressure Vacuum Breakers

The Department of Public Health opposes House Bill 5436.

A cross-connection is any actual or potential physical connection between a public water system, and any source of non-potable liquid, solid or gas that could contaminate the potable water supply by backflow. Backflow is the reversal of flow of water or other substances into the public water system or consumer's potable water system. Under backflow conditions, unprotected cross-connections can introduce biological, chemical and/or physical contaminants into the drinking water. Backflow prevention devices or backflow preventers are installed to prevent backflow of contaminants into drinking water through cross-connections. Devices used to prevent the backflow of water include double check valve assembly (DCVA) and/or reduced pressure backflow preventer (RPD).

This bill conflicts with current Department of Public Health regulations. Current regulations require the annual inspection and testing of these devices to ensure proper protections of the public drinking water supply. This bill would extend the frequency of inspections.

The Regulations of Connecticut State Agencies, Section 19-13-B38a (f) (7), states the following:

"The public water system shall have each RPD, DCVA and pressure vacuum breaker tested annually and shall maintain records of the test. Any malfunctioning device shall be promptly restored to proper operating condition by the owner. A summary of the results shall be forwarded to the Department of Public Health as a part of the annual cross connection survey report. All tests must be performed by a person who has met the requirements of Section 25-32-11(e) of the Regulations of Connecticut State Agencies."

This bill also conflicts with established Public Water Industry standards. The technical foundation for the Connecticut regulatory annual testing requirement is derived from the following documents:

1. US Environmental Protection Agency, 2003, "**Cross-Connection Control Manual**," Chapter 7 - Cross-Connection Control and Backflow Prevention Program, Section X. Periodic Testing, sub-section A: "*Reduced pressure backflow devices shall be tested and inspected at least semi-annually.*"
2. American Water Works Association, 2004, AWWA Manual M14, "**Recommended Practice for Backflow Prevention and Cross Connection Control**," Appendix B, Model Ordinance, section

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3.2.6: "It shall be the duty of the customer-user at any premises where backflow prevention assemblies are installed to have certified inspections and operational tests made at least once per year."

Reducing the frequency of testing would allow for longer periods of time for which failed devices would not be corrected. These failed devices would introduce contaminants into the public drinking water system. This situation will place the public at greater risk of consuming contaminants, and subject the public to consuming these contaminants for a much longer period of time.

Thank you for your consideration of the Department's views on this bill.

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