

Cross-Connection Control Plan

Water System Number: **CA3710029** Water System Name: **OLIVENHAIN MWD** Water System Classification: **Community** Related Regulating Agency: **DISTRICT 14 - SAN DIEGO**

Submitted: [MM/DD/YYYY] (No later than July 1, 2025)

Introduction

Olivenhain Municipal Water District (District), a Community Water System serving over 29,000 metered connections submits this Cross-Connection Control Plan (Plan) pursuant to the **State Water Resources Control Board's Cross-Connection Control Policy Handbook (CCCPH)**, Section 3.1.4, effective July 1, 2024. Adopted under **Ordinance No. 529** (May 21, 2025) the Policy and Plan, supported by the District's Administrative and Ethics Code for the administrative provisions. Aligned with the **Cross-Connection Control Policy** (effective May 21, 2025), this Plan ensures protection of the District's potable water distribution system from contamination due to cross-connections. It details compliance with CCCPH Chapter 3 through hazard assessments, backflow prevention, certified testing, recordkeeping, incident response, and public education. Premises are categorized as High, Moderate, or Low Risk to prioritize assessments, with all activities enforced via Ordinance 529 and the District's Administrative and Ethics Code and tracked in the EcosConnect cloudbased Cross-connection Control Management platform.

1. Compliance with CCCPH Chapter 3

The District ensures compliance with CCCPH Chapter 3 through its Cross-Connection Control Policy (Sec. 3-3.5) and Ordinance 530 enforcement mechanisms. The Policy governs hazard identification (3.2.1), backflow prevention installation and testing (3.2.2, 3.3.3), tester certification (3.4.1), and incident response (3.5.2-3).

2. Hazard Assessments (Policy 3.2.1)

- **Process**: Initial and ongoing assessments identify cross-connection hazards using customer surveys, GIS mapping, along with plans, specifications, and on-site inspections when needed, per Policy 3.2.1(a). Cross-Connection Hazards are categorized as either a high hazard crossconnection, a low hazard cross-connection, or having no hazard based on cross-connection potential, materials, piping complexity, and backflow history Policy 3.2.1(b-c)).
- Premises are categorized as High, Moderate, or Low Risk based on crossconnection potential, materials, piping complexity, and backflow history (CCCPH 3.2.1(b-c), Policy 3.2.1(b-c)).
- **Personnel**: Cross-Connection Control Program Coordinator, certified per Policy 1.5, leads assessments, supported by the Backflow and Cross-Connection Coordinator I, and District staff (as needed, trained annually). A contracted Certified Cross-Connection Specialist may assist in Hazard Assessments.

Timeframes:

Premises are categorized as High, Moderate, or Low Risk based on crossconnection potential, materials, piping complexity, and backflow history (Policy Appendix D: Cross-Connection Control Priority List).

Initial assessment:

- New service applications: Before service starts, per Policy 3.2.1.1(a) and the District's Administrative & Ethics Code Sec. 9.2.C.
- High Risk Properties: Within 2 years

- Moderate Risk Properties: Within 15 years
- Low Risk Properties: Within 35 years, primarily for residential premises.
- **Ongoing**: Within 30 days of triggering events, including account holder changes (excluding single-family residences), new/re-connected premises, changes in activities/materials, or backflow incidents, per Policy 3.2.1(e) and CCCPH 3.2.1(e)(1-4) or every 1 to 10 years (periodic review) based on the latest Hazard Assessment findings.
- Documentation: Assessment results, including hazard and backflow preventer assembly (BPA) details, are logged in EcosConnect cloud-based Cross-Connection Control Management platform, per Policy 3.5.1(a)(1). Risk categorizations are maintained internally by the Program Coordinator and are available to the State Water Board upon request.

3. Legal Authority for Corrective Actions (Policy 3.1.3)

Ordinance No. 529 (Sec. 3) deems policy violations unlawful, authorizing service discontinuation and fees (Sec. 4) for non-compliance (e.g., failure to install/test BPAs per Policy 3.2.1.1(d-e)).

4. Backflow Prevention Assemblies (BPA) Inspection and Field Testing (Policy 3.3.3)

- Process: Backflow prevention assemblies (BPAs) are tested after installation, repair, depressurization, or relocation, and at least annually, per Policy 3.3.3(a-b). Air gaps (AGs) are inspected annually (Policy 3.3.3(c)). High Risk premises may require more frequent testing if deemed necessary by the Program Coordinator (Policy 3.3.3(b)). The District notifies customers of testing requirements via a tiered schedule, per Policy 3.3.3(b)(1):
 - First notice (30-day): Informs customers that the BPA test is due within 30 days from the notice date.
 - Second notice (15-day): Issued if the test is past due (after the 30-day period), requiring testing within 15 days.

- Third notice (5-day): Issued if the test remains past due, requiring testing within 5 days.
- Final notice (48-hour): A disconnection notice issued if the test is still not completed, warning of service discontinuation within 48 hours unless compliance is achieved. Tests follow USC Foundation for Cross-Connection Control and Hydraulic Research Manual procedures (Policy 3.3.3(a)). Non-compliance after the final notice triggers service discontinuation, per Policy 3.3.3(b)(1)(D).

Timeframes:

Initial testing: at time of installation (Policy 3.3.3(d)).

Annual testing: Due by first notice due date; early testing >45 days prior rejected (Policy 3.3.3(b)(3)).

Test Results Submitted via EcosConnect cloud-based Cross-Connection Control Management platform: Passing within 10 days, failing within 5 days (Policy 3.3.3(b)(4).

Repairs: Within 30 days of failure, extendable (Policy 3.3.3(e)).

Documentation: Submitted via EcosConnect cloud-based Cross-Connection Control Management platform per Policy 3.3.3(g).

5. Non-Testable Backflow Preventers (Policy 3.2.2)

In 2012, the District adopted Ordinance 397, which identified non-testable backflow preventers (e.g., single check valves) under the District's ownership or administration and required that they be replaced with USC-approved backflow preventers.

As of April 4, 2025, four non-testable backflow preventers have not yet been replaced. Three are currently in the process of being replaced. For the fourth, the Rancho Santa Fe Fire Protection District is working with the property owners to review and potentially upgrade their existing fire protection systems.

Process: non-testable backflow preventers (e.g., single check valves) are not approved backflow prevention and must be replaced with approved backflow preventers in accordance with Policy 3.2.2 **Timeframe**: Replacements within 30 days. The District may provide additional time as it deems necessary. District Policy 3.2.1.1.

6. Tester Qualification and Process (Policy 3.4.1; 3.3.3(g))

Testers register and sign Backflow Testers Agreement (Policy 3.4.1(e)).

Testers submit valid certification from a certifying organization recognized by the State Water Board via EcosConnect cloud-based Cross-Connection Control Management platform (Policy 3.4.1(a)(1)); District verifies State Water Board recognition.

Test kits calibrated annually to NIST standards (Policy 3.4.1(a)(2)), calibration submitted via EcosConnect cloud-based Cross-Connection Control Management platform (Policy 3.4.1(a)(1)); District verifies the calibration certificate.

Records of BPA tests, repairs, overhaul and replacements must be submitted to the District via EcosConnect cloud-based Cross-Connection Control Management platform (Policy 3.3.3(g))

7. Backflow Incident Response (Policy 3.5.2)

Process:

Investigation per Policy 3.5.2: Immediate service discontinuation if confirmed (Policy 3.3.3(f)), followed by hazard assessment and BPA testing.

Notification per Policy 3.5.3(a): State Water Board and San Diego County Environmental Health notified within 24 hours.

Tier 1 public notice issued if required (CCR Title 22, Sec. 64463.1).

Timeframes:

Investigation: Initiated within 4 hours of report.

Report to State Water Board: Within 7 days if requested, per Policy 3.5.3(b).

Tier 1 public notice issuance requires a 24 hour notification period.

Documentation: Incident details per Appendix F (CCCPH) in Policy 3.5.1(a)(8), (Appendix D Backflow Incident Reporting Form).

8. Cross-Connection Control Personnel

Cross-Connection Control Program Coordinator:

Sean P Peterson,

Backflow and Cross-Connection Coordinator II,

AWWA Cross-Connection Control Specialist Cert# 02753

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Cross-Connection Coordinator:

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9. Tracking System (Policy 3.3.3)

The District retains records on its internal servers, on the District's website, and through the EcosConnect cloud-based Cross-Connection Control Management platform. Compliance tracking is maintained using both the EcosConnect portal and Excel spreadsheets.

(A) recordkeeping information required pursuant to CCCPH section 3.5.1,

(1) The two most recent hazard assessments for each user premise, conducted pursuant to CCCPH section 3.2.1 (Hazard Assessment); via EcosConnect portal

(2) each BPA, the associated hazard or application, location, owner, type, manufacturer and model, size, installation date, and serial number; via EcosConnect portal

(3) for each AG installation, the associated hazard or application and the location, owner, and as-built plans of the AG; via EcosConnect portal

(4) results of all BPA field testing, AG inspection, and swivel-ell inspections and field tests for the previous three calendar years, including the name, test date, repair date, and certification number of the backflow prevention assembly tester for each BPA field test and AG and swivel-ell; via EcosConnect portal

(5) repairs made to, or replacement or relocation of, BPAs for the previous three calendar years; via EcosConnect portal

(6) the most current cross-connection tests (e.g. shutdown test, dye test); via an Excel spreadsheet and electronic copies of reports on the District's servers.

(7) if a user supervisor is designated for a user premise, the current contact information for the user supervisor and water user, and any applicable training and qualifications as described by CCCPH section 3.2.2(f);

via an Excel spreadsheet and EcosConnect electronic copies of certifications are on the District's servers.

(8) descriptions and follow-up actions related to all backflow incidents;
via electronic copies of reports on the District's servers

(9) if any portion of the cross-connection control program is carried out under contract or agreement, a copy of the current contract or agreement; via electronic copies of reports on the District's servers

(10) the current Cross-Connection Control Plan as required in CCCPH section 3.1.4.;

via electronic copies on the District's servers and on the District's website

(11) any public outreach or education materials issued as required in CCCPH section 3.1.3.(a)(9) for the previous three calendar years;

via electronic copies on the District's servers

(B) location and type of each BPA; via EcosConnect portal

(C) highest threat potential hazard from which a given BPA is protecting the public water system distribution system;

via EcosConnect portal

10. User Supervisors (Policy 3.2.2(f))

Recycled Water User Supervisor:

A Recycled Water User Site Supervisor is a designated responsible authority at each Recycled Water Use Site that is responsible for the recycled water system at each use area under the user's control. Designated recycled water supervisors shall obtain instruction in the use of recycled water from an institution approved by the State DDW and County DEH.

The District currently tracks site supervisors with a spreadsheet to ensure each recycled water site supervisor is trained and ready to protect these sites. The spreadsheet contains the User Supervisors contact information. Each site supervisor is required to renew their training certificate every 5 years.

11. Corrective Actions (Policy 3.2.1.1(g), Policy 3.2.2(e), & Policy 3.3.3(e))

(A) If a cross-connection exists and the BPA installed is not commensurate with the user premises' hazard or no BPA has been installed, the District will notify the water user of the findings, listing the corrective actions to be taken. A period of thirty (30) days will be given to complete all corrective actions required, including installation of backflow prevention assemblies. Failure, refusal, or inability on the part of the water user to install said device or devices shall immediately constitute grounds for discontinuing water service to the premises until such device or devices have been properly installed. A 48-hour disconnection notice will be given to the customer prior to discontinuing service. The District may provide additional notification and/or time to make the necessary repairs as it deems necessary. This will be addressed on a case-by case basis. 3.2.1.1(g)

(1) A high hazard cross-connection fire protection system, including but not limited to fire protection systems that may utilize chemical addition

(e.g., wetting agents, foam, anti-freeze, corrosion inhibitor, etc.) or an auxiliary water supply, must have no less than RP protection. 3.2.2(e)

- Existing high hazard cross-connection fire protection systems with DCs, DCDAs, or DCDA-IIs installed before July 1, 2024, will be retrofitted to RPDA or RPDA-II by July 1, 2034, unless the District determines no hazard exists, per CCCPH Section 3.3.1(g)(2). Until retrofitted, these assemblies will be tested annually.
- (B) BPAs that fail a field test must be repaired or replaced. A period of thirty (30) days will be given to repaired or replace, and a passing test result submitted. Failure, refusal, or inability on the part of the water user to repair or replace said device or devices shall immediately constitute grounds for discontinuing water service to the premises until such device or devices have been properly repaired or replace, and a passing test result submitted. A 48-hour disconnection notice will be given to the customer prior to discontinuing service. The District may provide additional notification and/or time to make the necessary repairs as it deems necessary. This will be addressed on a case-by-case basis. 3.3.3(e)

12. Public Outreach and Education (Policy 3.1.3(a)(9))

Public Education:

The District will implement a cross-connection control public outreach and education program element that includes educating staff, customers, and the community about backflow protection and cross-connection control. The District will implement this requirement through a variety of methods which include articles in newsletters and bills inserts, social media messaging, and a dedicated webpage. New customers will receive an email and/or letter with information on backflow and cross-connection. The District will also educate the public through bill inserts and social media posts (e.g., X, Facebook).

The District maintains a Dedicated webpage: <u>www.olivenhain.com/cross-</u> <u>connection</u>.

New customer information packages within 14 days of account setup. The package will include: What a cross-connection is, backflow devices and why we

use them, hazard assessments, and contact information for staff designated to the program.

Olivenhain Personnel: The District will provide annual training to customer service and field staff. The training will be: What a cross-connection is, Cross-Connection Control Policy Handbook, backflow devices and why we use them, the districts cross-connection control plan, cross-connection incidents, hazard assessments, record keeping, staff designated to the program, and reporting criteria.

13. Local Entity Coordination

The District's program includes collaboration with various local entities to ensure effective hazard assessments, appropriate backflow prevention measures, and timely investigation of any backflow incidents.

Policy 3.1.3(a)(10) requires the District to coordinate with local entities involved in cross-connection control or public health protection. In alignment with this policy, the District actively engages with multiple local agencies and organizations, including the San Diego County Department of Environmental Health and Quality, local plumbing and permitting officials, law enforcement, fire departments, and both public and private entities.

The District also participates in the Cross-Connection Control Advisory Committee of San Diego and holds memberships with the Foundation for Cross-Connection Control and Hydraulic Research, as well as the American Water Works Association.