

Cross connections - What do I need to do?

The Cross Connection Control Regulations at 310 CMR 22.22 contain a variety of required public notice and education requirements targeting public water systems (PWS) and owners of cross connection devices. The following are three easy methods to comply with these requirements.

1. Education

310CMR 22.22(3)(f) requires, in part, that a PWS has a cross connection educational component for its residential customers. This can be easily achieved by posting an educational brochure to your PWS website and also including that brochure's link in your annual Consumer Confidence Report (CCR). Some systems include the whole brochure in their CCR.

2. Device Owners' Responsibilities

310 CMR 22.22(3)(n) requires PWSs to notify "all device owners of their responsibilities relative to cross connections control and 310 CMR 22.00." The device owners' responsibilities are listed at 310 CMR 22.22(4). (See excerpt below.)

You can comply with this requirement by printing a card to be left with the device owners during device testing, or by having a few sentences printed at the bottom of the testing sheets.

The link from item 1 above can be referenced along with language such as the following: "As an owner of a cross connection control device, you play a critical role in partnering with your local water system in keeping our water supply safe. By following the required annual or semiannual device testing mandated by the Cross Connection Control Regulations at 310 CMR 22.22, and keeping your device in good repair, you prevent contaminants from entering the water supply. Please see our website for further information at (insert link)."

310 CMR 22.22(4)

(4) Owner's Responsibilities. *The owner of any cross connection protected by a double check valve assembly or reduced pressure backflow preventer shall:*

(a) Notify the public water system of all cross connections protected by a double check valve assembly or reduced pressure backflow preventer and comply with all necessary approvals and permits from the public water system and/or the Department for the maintenance of cross connections, as specified at 310 CMR 22.22;

(b) Have suitable arrangements made so that inspection of backflow prevention devices and cross connection surveys can be made during regular business hours;

(c) Maintain a spare parts kit and any special tools required for the removal and reassembly of backflow prevention devices;

(d) Provide the necessary labor for inspection and testing by the Certified Backflow Prevention Device Testers or Certified Cross Connection Surveyor;

(e) Overhaul, repair, or replace within 14 days of the initial inspection date and retest pursuant to 310 CMR 22.22(13)(e), any device which fails a test or is found defective;

(f) Submit copies of the Inspection and Maintenance Report Form as required by the public water system.

3. Public Notice

310 CMR 22.22(3)(o) states, “Annually notify consumers of water and local public officials of the requirements of the distribution system cross connection control program, including mayors, town managers, city and town councilors or selectmen, water commissioners, fire chiefs, local boards of health, plumbing inspectors, building inspectors, local state representatives, unless waived in writing by the Department.”

One way of complying with this requirement is to write a summary of your Cross Connection Control Program at the end of your annual entry for your town report. You could make a pdf of the cross connection section of your Annual Statistical Report, post it to your website, and refer to that posting in your town report. This notification requirement intersects with the emergency response training requirements found at 310 CMR 22.04(13)(c), which requires “annual training of staff and local partners.” An annual meeting with “local partners” could be an opportunity to touch on the cross connection control program as it relates to emergency preparedness.

