

Notice 98-001

The United States Environmental Protection Agency (USEPA) recently published information regarding their push for a federal or state-mandated cross-connection program. The July 29, 1994 *Federal Register* solicited the public for comment on whether the USEPA should initiate a cross-connection control program requirement for all states. Specifically, the request asked the following questions:

1. What criteria should be implemented into such a requirement?
2. How recurrent should the evaluation of such a program be?
3. Should the requirement be limited to only existing cross-connections?
4. What conditions would warrant a waiver from the requirement?

The USEPA also requested information on what regulatory measures should be considered to keep the public water supply safe from contamination. This would include minimum water pressure concerns.

The November 3, 1997 edition of the *Federal Register* published the results of the above request for public comment. Most respondents agreed that a federal or state program would be beneficial. It was also recommended to the USEPA that the cross-connection control program have a backflow prevention agenda. This would include approved backflow preventer lists, as well as a categorical risk analysis of all service connections with regard to backflow. The program would also need to include periodic testing and maintenance of backflow prevention devices, and establish a backflow tester training program available to all who work in the field. Certification for inspectors would need to be established through a separate training program. There is also a need for at least one cross-connection control program specialist to carry out the program locally. Some of those who responded recommended a national disinfection procedure for repair of water lines and the installment of new lines.

Those who were opposed stated that a federally-mandated program would be impractical and would ultimately fail. They claimed a state program would be more appropriate than an USEPA-mandated program, and a good portion of states already have an existing program. They agreed that the USEPA should publish general guidelines only, and that there should be a separate regulation because a cross-connection control program would affect both surface water and ground water.

The Foundation would like to encourage all of our Members to voice their own concerns to the USEPA by contacting them at the following address:

IESWTR NODA Docket Clerk
Water Docket (MC-4101)
U.S. Environmental Protection Agency
401 M Street, SW
Washington, DC 20460.

Please submit an original and three copies of your comments and enclosures (including references). Comments must be received or post-marked by midnight February 3, 1998. Comments may be submitted electronically to ow-docket@epamail.epa.gov.