#### CROSS-CONNECTION CONTROL PROGRAM

#### LAKE WHATCOM WATER & SEWER DISTRICT



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LAKE WHATCOM WATER & SEWER DISTRICT 1220 LAKEWAY DRIVE BELLINGHAM, WASHINGTON 98229

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#### ACRONYMS AND ABBREVIATIONS

ANSI American National Standards Institute

AVB atmospheric vacuum breaker

AWWA American Water Works Association

BAT backflow assembly tester

CCS cross connection control specialist
DCDA double check detector assembly
DCVA double check valve assembly

District Lake Whatcom Water and Sewer District
DOH Washington State Department of Health
EPA US Environmental Protection Agency

IAPMO International Association of Plumbing and Mechanical

Officials

Program District Cross-Connection Control Program

psi pounds per square inch

PVBA pressure vacuum breaker assembly RCW Revised Code of Washington

RPBA reduced pressure backflow assembly
RPDA reduced pressure detector assembly
SVBA spill-resistant vacuum breaker assembly

UL Underwriters Laboratories UPC Uniform Plumbing Code

USC University of Southern California WAC Washington Administrative Code

## INTRODUCTION

The Lake Whatcom Water and Sewer District (District) is a special purpose district authorized under Title 57 Revised Code of Washington (RCW) to operate public water systems. The District operates four (4) potable water systems (South Shore, Eagleridge, Agate Heights, and Johnson Well), and is required to ensure protection of public health through the provision of minimum requirements and standards for design, construction, operation, and maintenance of its systems defined in Washington Administrative Code (WAC) Chapters 246-290 through -294. It is essential that physical cross-connections, which create or have potential to create an imminent and substantial danger to public health, be eliminated from the distribution system and plumbing system of customers. Backflow can result in potable water systems becoming a transmitter of disease, toxic materials, and other hazardous liquids. Therefore, it is necessary to establish and maintain this Cross-Connection Control Program (Program) to protect the health of water system customers by the control of actual and/or potential cross-connection through methods of containment and/or isolation.

#### 1.1 Authority

WAC 246-290-490 requires that public water supply systems establish a cross-connection control program for detecting and preventing cross-connections that create or have the potential to create an imminent and substantial danger to public health by and from contamination due to the cross-connection. Upon detection of a prohibited cross-connection, a public water purveyor is required to either eliminate the cross-connection by installation of an appropriate backflow prevention assembly acceptable to the water purveyor or discontinue service until the contaminant source is eliminated.

#### 1.2 Purpose

The intent of this Program is to provide for the permanent abatement or control, by way of backflow prevention, of all actual or potential cross-connections in the District's systems, as required by <u>WAC 246-290-490</u>. When it is deemed necessary by the District's Program Administrator, there will be installed, at a customer's service connection, an approved backflow prevention assembly commensurate with the degree of health hazard to the water supply.

#### 1.3 Definitions

Following are definitions presented in Washington State Department of Health (DOH) Publication 331-335 (DOH, 2023).

**Air Gap Separation.** A physical separation between the free-flowing end of a potable water supply pipeline and the overflow rim of an open or non-pressurized receiving vessel. To be an air gap approved by the DOH, Office of Drinking Water, the separation must be at least:

- Twice the diameter of the supply piping measured vertically from the overflow rim of the receiving vessel, and in no case be less than one inch, when unaffected by vertical surfaces (sidewalls); and:
- Three times the diameter of the supply piping, if the horizontal distance between the supply pipe and a vertical surface (sidewall) is less than or equal to three times the diameter of the supply pipe, or if the horizontal distance between the diameter of the supply pipe and in no case less than one and one-half inches.

Approved Atmospheric Vacuum Breaker (AVB). An AVB of make, model, and size that is approved by the department. AVBs that appear on the current approved backflow prevention assemblies list developed by the University of Southern California (USC) Foundation for Cross Connection Control and Hydraulic Research or that are listed or approved by other nationally recognized testing agencies (such as International Association of Plumbing and Mechanical [IAPMO], American National Standards Institute [ANSI], or Underwriters Laboratory [UL]) acceptable to the authority having jurisdiction are considered approved by the department.

**Approved Backflow Preventer.** Means an approved air gap, an approved backflow prevention assembly, or an approved AVB. The terms "approved backflow preventer," "approved air gap," or "approved backflow prevention assembly" refer only to those approved backflow preventers relied upon by the purveyor for the protection of the public water system. The requirements of <u>WAC 246-290-490</u> do not apply to backflow preventers installed for other purposes.

Approved Backflow Prevention Assembly. Means a reduced pressure backflow assembly (RPBA), reduced pressure detector assembly (RPDA), double check valve assembly (DCVA), double check detector assembly (DCDA), pressure vacuum breaker assembly (PVBA), or spill-resistant vacuum breaker assembly (SVBA) of make, model, and size that is approved by DOH. Assemblies that appear on the current approved backflow prevention assemblies list developed by the USC Foundation for Cross-Connection Control and Hydraulic Research or other entity acceptable to DOH are considered approved by DOH.

**Authority Having Jurisdiction.** (formerly known as local administrative authority) means the local official, board, department, or agency authorized to administer and enforce the provisions of the Uniform Plumbing Code as adopted under <a href="#">Chapter 19.27 RCW</a>.

**Auxiliary Water Supply.** Any water supply in use by the premises other than the District's approved public potable water supply. Auxiliary water supplies may include water from another purveyor's public water supply or any natural source(s) such as a well, spring, lake, river, stream, harbor, etc., or "used waters" or "industrial fluids." These waters may be polluted, contaminated, or may be objectionable and constitute an unacceptable water source over which the District does not have sanitary control.

**Backflow.** The undesirable reversal of flow of water or other substances through a cross connection into the public water system or consumer's potable water system.

**Backflow Assembly Tester (BAT).** A person holding a valid BAT certificate issued under <u>Chapter 246-292 WAC</u>.

**Back Pressure.** A pressure (caused by a pump, elevated tank or piping, boiler, or other means) on the consumer's side of the service connection that is greater than the pressure provided by the public water system and that may cause backflow.

**Back Siphonage.** Backflow due to a reduction in system pressure in the purveyor's distribution system and/or consumer's water system.

**Backflow Prevention Assembly.** An assembly that counteracts back pressure and prevents back siphonage.

**Backflow Prevention Assembly – Approved.** The term *approved backflow prevention assembly* shall mean an assembly that has met the requirements of the Manual of Cross Connection Control published by the USC Foundation for Cross-Connection Control and Hydraulic Research (USC, 2009).

**Check Valve.** A generic term used for a variety of valves that specifically allow flow in one direction only. A check valve in an approved assembly must be an approved check valve that is drip tight in the normal direction of flow when the inlet pressure is at least one (1) pound per square inch (psi).

#### **Combination Fire Protection System.** A fire sprinkler system that:

- is supplied only by the purveyor's water;
- does not have a fire department pumper connection; and
- is constructed of approved potable water piping and materials that serve both the fire sprinkler system and the consumer's potable water system.

**Consumer.** Any person receiving water from a public water system from either the meter, or the point where the service line connects with the distribution system if no meter is present. For purposes of cross-connection control, "consumer" means the owner or operator of a water system connected to a public water system through a service connection.

**Consumer's Water System.** Used in <u>WAC 246-290-490</u>, means any potable or industrial water system that begins at the point of delivery from the public water system and is located on the consumer's premises. The consumer's water system includes all auxiliary sources of supply, storage, treatment, and distribution facilities, piping, plumbing, and fixtures under the control of the consumer.

**Contaminant**. Any substance present in drinking water that may adversely affect the health of the consumer or the aesthetic qualities of water.

**Council.** The Washington state building code council under <u>WAC 51-04-015(2)</u>.

**Cross-Connection.** Any actual or potential physical connection between a public water system or the consumer's water system and any source of nonpotable liquid, solid, or gas that could contaminate the potable water supply by backflow.

**Cross-connection Control Program.** The administrative and technical procedures the purveyor implements to protect the public water system from contamination via cross-connections as required in <u>WAC 246-290-490</u>.

**Cross-Connection Control Specialist (CCS).** A Person holding a valid CCS certificate issued under chapter 246-292 WAC.

**Cross-connection Control Summary Report.** The annual report that describes the status of the purveyor's cross-connection control program.

**Customer**. Any person or organization who receives water from the District.

**Distribution System**. All piping components of a public water system that serve to convey water from transmission mains linked to source, storage and treatment facilities to the consumer excluding individual services.

**Double Check Detector Assembly (DCDA).** An assembly composed of two double check valve assemblies, set in parallel, equipped with a meter on the bypass line to detect small amounts of water leakage or use.

**Double Check Valve Assembly (DCVA).** An assembly composed of two single, independently acting check valves, including tightly closing shutoff valves located at each end of the assembly and suitable connections for testing the water tightness of each check valve.

**Emergency.** An unforeseen event that causes damage or disrupts normal operations and requires immediate action to protect public health and safety.

Flow-through Fire Protection System. A fire sprinkler system that:

- is supplied only by the purveyor's water;
- does not have a fire department pumper connection;
- is constructed of approved potable water piping and materials to which sprinkler heads are attached; and
- terminates at a connection to a toilet or other plumbing fixture to prevent stagnant water.

**High Health Cross-connection Hazard.** A cross-connection involving any substance that could impair the quality of potable water and create an actual public health hazard through injury, poisoning, or spread of disease.

**In-premises Protection.** A method of protecting the health of consumers served by the consumer's potable water system, located within the property lines of the consumer's premises by the installation of an approved air gap or backflow prevention assembly at the point of hazard, which is generally a plumbing fixture.

**Isolation**. A method of controlling potential and/or confirmed cross-connections by installation of an air gap separation or a vacuum breaker.

Low Cross-connection Hazard. A cross-connection that could impair the quality of potable water to a degree that does not create a hazard to the public health, but does adversely and unreasonably affect the aesthetic qualities of potable waters for domestic use.

**Potable.** Water suitable for drinking by the public.

**Premises Isolation.** A method of protecting a public water system by installation of approved air gaps or approved backflow prevention assemblies at or near the service connection or alternative location acceptable to the purveyor to isolate the consumer's water system from the purveyor's distribution system.

**Public Water Supply**. Any system or water supply intended or used for human consumption or other domestic use, including source, treatment, storage, and distribution where water is furnished to any community, collection or number of individuals, or is made available to the public for human consumption or domestic use, but excluding supplies serving one single-family residence.

**Purveyor.** An agency, subdivision of the state, municipal corporation, firm, company, mutual or cooperative association, institution, partnership, or person or other entity owning or operating a public water system. Purveyor also means the authorized agents of these entities.

**Reclaimed Water.** Effluent derived in any part from sewage from a wastewater treatment system that has been adequately and reliably treated, so that as a result of that treatment, it is suitable for beneficial use or a controlled use that would not otherwise occur, and it is no longer considered wastewater

Reduced Pressure Backflow Prevention Assembly (RPBA). An assembly incorporating two or more check valves and an automatically operating differential relief valve located between the two check valves, two shutoff valves and equipped with necessary appurtenances for testing. The assembly shall operate to maintain the pressure in the zone between the two check valves, less than the pressure of the public water supply side of the assembly even at cessation of normal flow. In the case of leakage of either check valve, the differential relief valve shall operate to maintain this reduced pressure by discharging to the atmosphere. When the inlet pressure is two psi or less, the relief valve shall open to the atmosphere, thereby providing an air gap in the assembly. This air gap shall also be above the 100-year flood level.

Severe Health Cross-connection Hazard. A cross-connection which could impair the quality of potable water and create an immediate, severe public health hazard through poisoning or spread of disease by contaminants from radioactive material processing plants, nuclear reactors, or wastewater treatment plants.

**State Building Code.** The codes adopted by and referenced in <u>Chapter 19.27 RCW</u>; the state energy code; and any other codes so designated by the Washington state legislature as adopted and amended by the council.

**Thermal Expansion.** The pressure increase due to the rise in water temperature.

Unapproved Auxiliary Water Supply. A water supply (other than the purveyor's water supply) on or available to the consumer's premises that is either not approved for human consumption by the health agency having jurisdiction or is not otherwise acceptable to the purveyor.

**Uniform Plumbing Code (UPC).** The code adopted under <u>RCW 19.27.031(4)</u> and implemented under <u>Chapter 51-56 WAC</u>. This code establishes statewide minimum plumbing standards applicable within the property lines of the consumer's premises.

**Used Water.** Water that has left the control of the purveyor.

#### 1.4 General Policy

- 1. To provide for an orderly and adequate means of backflow prevention, the District has adopted Resolution No. 902, which establishes the requirements herein for the protection of its distribution systems (see Appendix A). New water service connections will be installed, and existing water service connections will be modified to conform to these requirements where applicable.
- 2. The District's responsibility for backflow prevention begins at the water supply source and includes all water treatment, storage, and distribution facilities. The District's responsibility ends at the point of delivery to the consumer's water system, which begins at the downstream end of the District's service connection water meter located within the public right-of-way or District-held easement.
- 3. Under provisions in <u>WAC 246-290-490</u>, the District is not responsible for eliminating or controlling cross-connections within the consumer's water system i.e., within the property lines of the consumer's premises. That responsibility falls under the jurisdiction of the local administrative authority that is authorized to administer and enforce the Uniform Plumbing Code (Whatcom County).
- 4. The District's water supply to any premises listed in <u>WAC 246-290-490(4)(b)(iv)(Table 13)</u> requires an approved air gap or an approved RPBA at the service connection, prior to any branch connections, on the customer's side of the property line. These premises include, but are not limited to:
  - Agricultural (farms and dairies)
  - Beverage bottling plants
  - Car washes
  - Chemical plants
  - Commercial laundries and dry cleaners
  - Premises where both reclaimed water and potable water are provided
  - Film processing facilities

- Food processing plants
- Hospitals, medical centers, nursing homes, veterinary, medical and dental clinics, and blood plasma centers
- Premises with separate irrigation systems using the purveyor's water supply and with chemical addition (for example, parks, playgrounds, golf courses, cemeteries, estates, etc.)
- Laboratories
- Metal plating industries
- Mortuaries
- Petroleum processing or storage plants
- Piers and docks
- Radioactive material processing plants or nuclear reactors (RPBAs for connections serving these premises are acceptable only when used in combination with an in-plant approved air gap; otherwise the District will require an approved air gap at the service connection)
- Survey access denied or restricted
- Wastewater lift stations and pumping stations
- Wastewater treatment plants (RPBAs for connections serving these premises are acceptable only when used in combination with an in-plant approved air gap; otherwise the District will require an approved air gap at the service connection)
- Premises with an unapproved auxiliary water supply, regardless of a physical connection with the potable water supply (customers with permit-exempt wells may choose to either decommission the well in accordance with Washington State Department of Ecology standards, or install RPBAs at all service connections where customer's system is interconnected with the District's system. Similarly, customers with direct draw piping from any surface water body shall install RBPAs at all service connections where the customer's system is interconnected with the District's system.)¹
- Premises with fire suppression systems that include chemical injection devices and/or booster pumps (flow through systems are exempt)
- 5. Backflow prevention requirements for single family residences, when applicable (per WAC 246-290-490(4)(c), will comply with the following:
  - The type of backflow prevention required will provide a level of protection commensurate with the degree of the cross-connection hazard:

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Washington State Department of Health Publication No. 331-743, Unapproved Auxiliary Water Supplies, provides guidance on options a public water system may consider in protecting against potential contamination from an unapproved water supply. The District selects the identified option that is most protective of public health, which exceeds the requirements defined in WAC 246-290-490((4)(b)(iv)(Table 13).

- Backflow prevention assemblies will be installed according to District specifications;
- Assemblies are installed, inspected, and tested in accordance with <u>WAC 246-290-490</u>;
   and
- Backflow preventer must be installed when permanently installed irrigation systems or
  other outdoor water use systems such as, but not limited to, swimming pools, spas,
  boilers, and ponds (excludes hose bibs) as determined by the District to present a
  cross-connection risk are installed.
- 6. Any mobile unit or apparatus that uses the water from any premise within the District's water system shall first obtain authorization from the District and be inspected prior to use on District facilities to ensure appropriate backflow protection is installed and maintained; backflow assemblies installed on mobile units must also be tested annually by a certified backflow assembly tester.
- 7. All temporary water connections supporting construction are required to have the following cross-connection protection;
  - A USC-listed DCVA shall be installed a minimum of 12 inches below grade in a box near the property line just beyond the private pressure reducing valve
  - After installation, the DCVA shall be tested by a certified backflow assembly tester and test report submitted to the District's online backflow test management software.

## 2 PROGRAM OBJECTIVES

The objectives of this Program are to:

- 1. Reasonably reduce the risk of contamination of the public water distribution systems; and
- 2. Reasonably reduce the District's exposure to legal liability arising from the backflow of any contaminant originating from a customer's plumbing system that is then supplied to other customers.

#### 2.1 Summary of Program Decisions

The following table summarizes the major policy and program decisions adopted for District water systems. The items in the table represent cross-connection control program areas that have more than one acceptable approach or option.

Decision Item	Decision
1. Type of Program [General, WAC 246-290-490(2)(e)]	
a. Premises isolation only [WAC 246-290-010]	No
b. Premises isolation and in-premises protection (combination program) [WAC 246-290-010]	Yes
2. Extent of Coordination with Local Administrative Authority [WAC 246-290-490(2)(d)]	
a. Information exchange	Yes
b. Interaction	No
c. Joint program	No
3. Relationship with Customer [Element 1]	
a. Signed service agreement or contract	No
b. Ordinance/resolution; implied service agreement	Yes
4. Enforcement of Corrective Action [Element 1]	
Rely upon shut-off of water service	Yes
b. Rely upon District-installed premises isolation	Yes
5. Assessment and Re-assessment of Hazard [Element 2]	
a. By District's staff or equivalent	Yes
b. By cross-connection control specialist (CCS) employed by customer;	Yes
report reviewed by District's CCS	
6. Location and Ownership of Premises Isolation Assembly [Element 3]	
a. On District's service line	No
b. On customer's service line	Yes
7. CCS Option – District's Program Management [Element 4]	
a. District's staff member certified	Yes
b. Inter-agency agreement or use other agency's CCS	No
c. Contract with consultant CCS	No
8. Testing of Assemblies [Element 5]	Na
a. By District's staff or District-employed backflow assembly tester (BAT)	No Yes
b. By customer-employed (contractor) BAT	res
9. Cost Recovery [WAC 246-290-100(4)(h) and -105(4)(p)]	NIa
a. Borne by all customers (general water rates)	No No
b. Assessed to specific class (commercial meters)	Yes
c. Each customer directly bears cost	res

3 PERSONNEL

#### 3.1 Program Administrator

The Cross-Connection Control Manager (Administrator) is responsible for organizing and implementing the District's program. The Administrator will hold a valid Washington State Cross-Connection Control Specialist certification, be experienced in water works operations, and have specific training through recognized courses and seminars in cross-connection control and

backflow prevention. Duties include the initial screening of all service applications and determination of the need for the proper backflow prevention assembly; corresponding with customers; record keeping for the program; periodic review of customer premises and/or consumption patterns to ensure that all cross-connections are controlled; initiation of enforcement action; response to contamination events; investigation; and communication with state health authorities.

#### 3.2 Cross-Connection Control Specialist

This person must hold a valid Washington State Cross-Connection Control Specialist certification in accordance with <u>WAC 246-290-490</u>. Duties include plan review; initial and repeat survey of facilities; review of tests done by a certified BAT; recommendation of installation standards and procedures required for premise isolation; recommendation of material for public education; input test and assembly data into computer data base; and assist the program administrator. All District operations staff with current Washington State cross-connection control certification serve, as needed, in the role of Cross-Connection Control Specialist.



#### 4.1 Consumer Education

Public education is a very important aspect of this Program. Premises with a low priority for a cross-connection control hazard survey (see Appendix B), such as single-family residential homes, may never be surveyed. Annually, at a minimum, customers are provided with informational brochures describing cross-connection hazards in homes and the recommended assemblies that are to be installed by the homeowner to reduce the hazards. In addition, cross-connection hazard and control information is maintained on the District's <u>website</u>. Public education explains the necessity of the cross-connection control program and prevents misunderstandings.

The District's consumer education will be clear that the information provided is based on its perspective of cross-connection control and the necessary backflow prevention to protect the public water supply, and that the customer has the obligation to comply with these requirements.

#### 4.2 Customer Information Packet

Information on the District's cross-connection control program is available to all customers, both as hard copies and on the District's <u>website</u>. The priority for handing out the packet, including an introductory letter, will be determined from the risk assessment done by the Program Administrator.

Customers with new water services or newly purchased homes in the District will be given a New Customer Information Packet, which includes information regarding this Program and its backflow prevention requirements (Appendix C).

## 5 CROSS-CONNECTION CONTROL PROGRAM HEALTH HAZARD EVALUATION

A. Non-residential (commercial/industrial/government) services are considered to have the greatest potential for adverse health hazard cross-connections to exist within their plumbing systems and are therefore, assessed as high health hazard risks. As such, all non-residential customers are required to install RPBAs, at a location just downstream of their service meter, in order to achieve premise isolation.

The District will conduct health hazard evaluations at and/or within customer premises, where plumbing systems are mostly visible, to ensure that either no direct or indirect cross-connections exist or, if they do exist, they are protected by a backflow prevention assembly commensurate with the assessed degree of health hazard. If, at the sole discretion of District's Program Administrator, plumbing systems are not adequately visible for thorough inspection, even though no apparent cross-connection is visible, protection by a backflow prevention assembly commensurate with the assessed degree of health hazard will be required.

Upon the initiation of a health hazard evaluation, the District will contact the customer/owner, and an appointment to meet the owner or representative at the premises will be made. At this time, the District's conditions for service, the regulations regarding cross-connections, and the customer's responsibility to install a proper backflow prevention assembly, if needed, will be explained to the customer.

- B. The customer should be reminded that the evaluation of the premises is for the sole purpose of establishing the District's minimum requirements for the protection of the public water supply system, commensurate with the District's assessment of the degree of health hazard. It is not to be assumed by the customer or other regulatory agencies that the District's backflow prevention assembly survey requirements, or other actions by District personnel, constitutes an approval of the customer's plumbing system, or an assurance to the customer of the absence of cross-connections therein.
- C. The District's Program Administrator will establish the priority of its health hazard evaluations and/or repeat surveys of premises based on the risk management policies established by the District, and the minimum requirements imposed by DOH.

In accordance with DOH regulations (<u>WAC 246-290-490</u>), and the American Water Works Association (AWWA) Manual for Backflow Prevention and Cross-Connection Control Recommended Practices (AWWA, 2024), the Administrator will establish standards and procedures governing the application, installation, approval and testing of backflow prevention assemblies, and other related tasks. The Administrator may also establish such other more stringent requirements deemed necessary to reduce the risk of contamination of

the public water supply system.

D. The systematic program of health hazard evaluations will be established with priority given on the basis of risk to public health and will be outlined as follows:

#### **New Construction**

- Upon application for water service permit, the customer will be informed of the appropriate backflow prevention assembly installation and testing requirements.
- Before water service commences, a completed successful test of the assembly and a proper report from a Washington State-certified BAT must be received by the District.

#### **Existing Premises**

- All existing premises will be listed by category, on a priority basis for surveying, as needed, based upon the risk assessment. After the initial prioritization, a list of repeat surveys will be established, and the list will be followed, except in circumstances that require a special survey such as a response to a water quality complaint.
- An authorized District Cross-Connection Control Specialist will conduct the initial health hazard evaluation of the premise.
- Upon completion of the initial premise health hazard evaluation the Cross-Connection Control Specialist will brief the Program Administrator of the findings.
- The Program Administrator will issue the evaluation report and a compliance letter to the property owner if a backflow prevention assembly is needed.
- Approved backflow prevention assemblies must be installed under the following time frame:
  - Low-Health Hazard 30 days
  - High-Health Hazard 10 days
  - Severe-Health Hazard immediately
- Upon the date that corrective action was to have been completed, the Program Administrator will confirm that corrective actions have been completed in accordance with District requirements. If corrective actions have not been completed, the Administrator will issue a compliance-warning letter with a new corrective action completion date. Upon the final compliance date, the Administrator will confirm the corrective actions have been completed. If they have not been completed, the Administrator will issue a service termination door hanger and the service will be terminated by District staff.
- All copies of correspondence, test results, and completed actions will be located in the District's backflow testing management software). Records will be kept for a minimum of five (5) years, or as long as the backflow prevention assembly remains in service.
- Evaluations will be completed at least every three years, or more often if the degree of hazard so dictates.

#### 5.1 Hazard Evaluation Procedure

Evaluation of hazards will be conducted as follows:

- 1. Send the "On Site Cross-Connection Health Hazard Inspection Scheduling" letter to customer within 30 days of discovering a cross connection hazard.
  - If customer responds to the letter, schedule an evaluation and proceed with Step No. 3.
  - If no response is received within 15 days, proceed with Step No. 2.
- 2. Send the "On Site Cross-Connection Health Hazard Inspection Scheduling Final Notice" letter.
  - If customer responds to the letter, schedule an evaluation and proceed with Step No. 3.
  - If the customer fails to respond within 14 days, the customer's service will be subject to disconnection.
- 3. Meet the customer on-site and conduct the health hazard evaluation of customer's premise. Take notes and if necessary, make a sketch. Fill out health hazard evaluation report form. Proceed with Step No. 4.
- 4. Send confirmation of health hazard evaluation assessment results to customer.
  - If no corrective action is needed, attach letter informing customer.
  - If corrective action is needed, attach a letter informing customer of the requirements and timeline for compliance. Proceed with Step No. 5.
- 5. Obtain the initial backflow prevention assembly test report and enter information into the Program database for annual testing compliance tracking. If the customer fails to have the backflow prevention assembly tested, proceed with Step No. 6.
- 6. Follow-Up with the "Backflow Prevention Assembly Testing Second Notice" letter.
  - If customer responds to this letter, schedule a follow-up evaluation. Obtain the backflow prevention assembly test report(s) and enter information into the Program database.
  - If the customer fails to respond within 14 days, proceed to Step No. 7.
- 7. Send the "Backflow Prevention Assembly Testing Final Notice" letter.
  - If customer responds to this letter, schedule a follow-up evaluation. Obtain the backflow prevention assembly test report(s) and enter information into the Program database.
  - If the customer fails to responds within 10 days, disconnect the service.

When a customer's service is subject to disconnection, a door hanger will be placed at the property, notifying the customer that their water will be shut off in ten (10) days. At that time, the customer has the option of complying with the District's direction or having their service

disconnected. Water service will remain disconnected until the customer complies with District requirements. As per <u>WAC 246-290-490</u>, the appropriate local administrative authority (Whatcom County Health and Community Services) will be notified prior to taking any action.

### 6

#### BACKFLOW PREVENTION ASSEMBLY INSTALLATION

#### 6.1 General Requirements

All backflow prevention assemblies shall comply with those on the most current list of DOH-approved backflow prevention assemblies (<a href="https://fccchr.usc.edu/list.html">https://fccchr.usc.edu/list.html</a>). Installation of backflow prevention assemblies in existing systems will be accompanied by the necessary upsizing of the system to ensure adequate flow capacity for proper operation of the system. Installation requirements include, but are not limited to, the following:

- An assembly more than five (5) feet above the floor or ground level must have a permanent platform under it for the tester or maintenance person to stand on.
- Approved assemblies must be installed at the end of the District's service connection and on the customer side of the property line.
- All assemblies shall be the size, type, and model pre-approved by DOH.
- The model of the assembly and installation plans will be submitted to the District for approval prior to installation.
- When installed in an enclosure, adequate space considerations must be given for proper testing and maintenance as per manufacturer specifications.
- Assemblies shall not be installed in any enclosure or hooded area containing fumes that are corrosive, toxic, or poisonous.
- No part of the approved assembly will be permitted to be submerged under water, nor installed at a location subject to flooding. If installed in a vault, adequate drainage shall be provided. In all cases, whenever access to a vault is required, follow and comply with local, state, and federal safety rules regarding confined space entry. The vault shall be large enough for free access for workers to enter for testing and/or repairing the assembly. RPBAs may be installed in a vault only if the relief valve discharge can be drained to daylight through a "bore sight" type drain. The drain will be of adequate capacity to carry the full rated flow of the assembly and will be screened at both ends. An approved air gap will be located on the relief valve.
- Assemblies 2.5 inches and larger will have support blocks to prevent damage to the assembly or piping.
- For installations where 24 hour uninterrupted service is necessary, a parallel assembly shall be provided to permit assembly testing and maintenance. The bypass or parallel backflow prevention assembly must be of the same type as the main line assembly.

• Thoroughly flush the lines before installing the assembly to eliminate debris from the lines that could foul one of the checks or relief port.

#### 6.1.1 Freeze Protection

Backflow prevention assemblies are installed on all types of water services, so it is not always appropriate to shut down a system to drain the assembly to prevent freezing. Backflow prevention assemblies should be protected from freezing and other severe weather. Experience has shown that freeze damaged assemblies are often damaged beyond repair, so they must be replaced. All backflow prevention assemblies should have provisions for freeze protection.

#### 6.1.2 Thermal Expansion

A backflow prevention assembly placed on a water service can exacerbate thermal expansion issues in the system by creating a closed plumbing system, eliminating a pathway to relieve the pressure. Serious damage could occur to a plumbing system if the pressure and high temperature caused by thermal expansion is not relieved. Excessive water temperature or pressure inside a hot water tank, if not relieved, could cause the tank to explode. The customer's hot water tank and connected plumbing system is normally protected by a temperature/pressure relief valve located at or near the top of the hot water heater. In addition, some plumbing codes require a thermal expansion tank to be installed.

#### 6.2 Air Gap Separation Installation Requirements

An air gap separation is designed to prevent backflow caused by both severe and high-health hazard assessments.

An approved air gap is a physical separation between the free-flowing discharge end of the District supply line, and the overflow rim of an open or non-pressurized receiving vessel. These separations must be vertically orientated a distance of at least twice the inside diameter of the inlet pipe, but never less than one (1) inch.

An obstruction around or near an air gap may restrict the flow of air into the outlet pipe and nullify the effectiveness in preventing back siphonage. When affected by sidewalls, the vertical separation must be at least three (3) times that of the inside pipe diameter.

#### 6.3 Reduced Pressure Backflow Assembly Installation Requirements

An RPBA is designed to prevent backflow caused by backpressure and back siphonage for both lowand high-health hazard assessments.

The following installation practices are common to all RPBAs and reduced pressure detector assemblies:

1. An RPBA will only be installed in the orientation for which it is approved. Any other configuration may hinder the assembly in preventing backflow.

- 2. The RPBA must be on the DOH-approved list.
- 3. The RPBA must be tested upon installation and annually thereafter.
- 4. The RPBA must be tested immediately following relocation or repair.
- 5. An RPBA must be installed above ground at a minimum of twelve (12) inches from relief valve opening to ground or 100-year flood level.
- 6. The assembly must be protected from freezing and other severe weather conditions, and from accidental damage.
- 7. Because of the inherent design of an RPBA, fluctuating supply pressure condition may cause nuisance dripping and potential fouling of the assembly. In a static condition, the zone of reduced pressure between the check valves must be maintained at a pressure of 2.0 psi or greater differential below incoming supply pressure. Depending upon the degree of fluctuating pressure, the assembly may discharge water from time to time.
- 8. Approved assemblies larger than two (2) inches shall have a minimum clearance of twelve (12) inches on the backside and twenty-four (24) inches on the test cock side, twelve (12) inches plus the nominal size of the assembly below the assembly and thirty-six (36) inches above the assembly.

Assemblies less than two (2) inches shall have a minimum clearance of six (6) inches on the backside, twelve (12) inches on the test cock side of the assembly, and twelve (12) inches plus the nominal size of the assembly below the assembly and thirty-six (36) inches above the assembly.

#### 6.4 Double Check Valve Assembly Installation Requirements

A DCVA is designed to prevent backflow caused by backpressure and back siphonage for low health hazard assessments.

The following installation practices are common to all DCVAs:

- 1. Unless the DCVA has been elevated and approved by the District, it will only be installed in a horizontal configuration. Any other orientation may deter the DCVA from preventing backflow.
- 2. A DCVA may be installed in a pit below ground. If so, adequate room for testing and maintenance must be provided. Plugs must be installed in the test cocks to reduce the risk of groundwater being siphoned through a leaking test cock. The test cocks must be installed facing up or to one side. Sufficient draining must be provided to prevent the assembly from being submerged.
- 3. Approved assemblies two (2) inches or larger will have a minimum clearance of six (6) inches on the backside and twelve (12) inches on the test cock side, twelve (12) inches below the assembly and adequate room above the assembly.
  - Assemblies less than two (2) inches will have a minimum clearance of six (6) inches on the test cock side and (6) inches below the assembly.

- 4. The DCVA must be on the DOH-approved list.
- 5. The DCVA must be tested upon installation and annually thereafter.
- 6. The DCVA must be tested immediately following relocation or repair.
- 7. The DCVA must be protected from freezing and other severe weather conditions, and from accidental damage.

#### 6.5 Double Check Detector Assembly Installation Requirements

A double check detector assembly (DCDA) is designed to prevent backflow caused by backpressure and back siphonage. They are used for low health hazard assessments on fire lines.

The following installation practices are common to all DCDAs:

- 1. Unless the DCDA has been elevated and approved by the District, it will only be installed in a horizontal configuration. Any other orientation may deter the DCDA from preventing backflow.
- 2. A DCDA may be installed in a pit below ground. If so, adequate room for testing and maintenance must be provided. Plugs must be installed in the test cocks to reduce the risk of ground water from being siphoned through a leaking test cock. The test cocks must be installed facing up or to one side. Sufficient draining must be provided to prevent the assembly from being submerged.
- 3. Approved assemblies larger than two (2) inches will have a minimum clearance of twelve (12) inches on the backside and twenty-four (24) inches on the test cock side, twelve (12) inches plus the nominal size of the assembly below the device and thirty-six (36) inches above the assembly.
  - Assemblies less than two (2) inches will have a minimum clearance of six (6) inches on the test cock side and (6) inches below the assembly.
- 4. The DCDA must be on the DOH-approved list.
- 5. The DCDA must be tested upon installation and annually thereafter.
- 6. The DCDA must be tested immediately following relocation or repair.
- 7. The DCDA must be protected from freezing and other severe weather conditions, and from accidental damage.

## 7 BACKFLOW PREVENTION ASSEMBLY TESTING

All backflow prevention assemblies will be tested upon installation, after repair or relocation, and at a minimum, annually in accordance with <u>WAC 246-290-490(7)</u>. The District will notify cross-

connection customers each year that an annual test of their backflow prevention assembly is required. The test must be completed and the associated test report must be received at the District.

- A. It is the cross-connection customer's responsibility to ensure that the test report has been received by the District. The District will not acknowledge that a test has been completed until the test report has been entered into the backflow testing management software.
- B. A BAT, holding a valid Washington State BAT certification is required to complete all testing of backflow prevention assemblies. Testers are required to furnish current DOH certification and verification of test equipment calibration to the District, prior to the District's acceptance of backflow prevention assembly test reports. All test reports will be furnished on a form provided by, or one acceptable to the District. Test results will be compared with previous results for the specific assembly, and with statistical results for the type, make and model of assembly.
- C. Certified BATs must enter into the backflow software, at least annually, written verification of the calibration accuracy of the test and calibration equipment used.
- D. Each customer has at least 30 days after notification in which to complete the test and confirm that the District has received the test report reflecting passing results.
- E. Customers will advise the BAT that the test report will be added to the District's backflow testing management software.
- F. The customer is responsible for the replacement or repair of the backflow prevention assembly if the assembly fails its operational test.

#### 7.1 Previously Installed Assemblies

Backflow prevention assemblies that were approved at the time of installation but are not on the current list of approved assemblies will be permitted to remain in service provided they are maintained; are commensurate with the degree of hazard; pass backflow assembly testing at least annually.

- Backflow prevention assemblies in service but not currently listed as a DOH-approved assembly will be replaced by an assembly on the current list of approved assemblies (<a href="https://fccchr.usc.edu/list.html">https://fccchr.usc.edu/list.html</a>) if the existing assembly is relocated or requires more than minimum maintenance to pass the annual test.
- If a water system protected by a backflow prevention assembly is modified to include components or additives requiring a higher level of protection against backflow, the backflow prevention assembly will be replaced with an approved assembly appropriate for the degree of hazard.

#### 7.2 Annual Backflow Prevention Assembly Testing Notice Procedure

Annual backflow prevention assembly testing notification will be conducted as follows:

1. Send "Annual Backflow Prevention Assembly Testing" letter one (1) month before due date.

- As customers complete their tests and test reports are received, enter the test results into
  the backflow software. Ensure that any backflow prevention assembly that has been
  replaced is on the list of approved assemblies.
- If no response to this letter 14 days after the due date, proceed to Step No. 2.
- 2. Send "Backflow Prevention Assembly Testing Second Reminder Notice" letter.
  - As customers complete their tests and test reports are received, enter test results into Program database. Ensure that any backflow prevention assembly that has been replaced is on the list of approved assemblies.
  - If no response 10 days after this letter, proceed to Step No. 3.
- 3. Send "Backflow Prevention Assembly Testing Third and Final Reminder Notice" letter.
  - If customer responds to the letter, obtain the test report for the backflow prevention assembly and enter into Program database. Ensure that any backflow prevention assembly that has been replaced is on the list of approved assemblies.
  - If no response 10 days after this letter, proceed to Step No. 4.
- 4. Staff will put a door hanger on the home or business stating the water will be shut off in 10 days.

When a customer's service is subject to disconnection, the customer has the option of complying with the District's direction or having their service disconnected. Water service will remain disconnected until the customer complies with District requirements. As per <u>WAC 246-290-490(2)(j)</u>, the appropriate local administrative authority (Whatcom County Health and Community Services) will be notified prior to taking any action.

## 8 ENFORCEMENT

The District may immediately terminate water service, require disconnection of a cross connection, and/or impose fines when the District determines that a health hazard, or potential health hazard, exists. An example of a health hazard is an uncontrolled potential, direct or indirect cross-connection, and/or a cross-connection that is not controlled commensurate with the degree of health hazard.

Advanced notification will be provided before any of the above measures are taken, unless the degree of hazard, or potential degree of hazard, is so severe that it could cause immediate contamination and/or health threat. The following circumstances may result in termination of water service, the imposition of a fine, or both:

Refusal to install a backflow prevention assembly when required by the District or DOH

- Failure to replace an improper type, and/or failure to replace or repair a defective or improperly installed backflow prevention assembly
- Failure to have the backflow prevention assembly tested and/or inspected per District requirements
- Existence of a high health hazard cross-connection, to the District's system, that is not protected with the appropriate backflow prevention assembly
- Refusal to allow inspection of the premises

In the case of application for water service, the service will not be granted if the District determines that any of the above conditions exist.

Prior to taking action to disconnect or deny service to a premise, the appropriate local administrative authority (Whatcom County Health and Community Services) and/or Whatcom County Fire Marshal will be notified (WAC 246-290-490(2)(j)).

Customers who remain out of compliance for two (2) months will be subject to disconnection and will remain disconnected until compliance is met. The foregoing remedy for violations will not be exclusive. The District, DOH, and/or other regulatory agencies will be entitled to enforce this Program and the applicable regulations in any manner available by law.

In the event that the water service is terminated and/or the meter removed, then the service will not be resumed nor the meter reinstalled until the customer has complied with the Program requirements, and paid any then delinquent rates, charges or fines. In addition, the customer will have paid the District's standard turn-on and/or meter re-installation charges. The cost of disconnection by the District, as established in the District's Master Fees and Charges Schedule, will be charged to the property, and payment enforced in the same manner as for other rates and charges.

The District will not be held liable for damages nor will allowances be made for loss of production, sales or services, or any other consequential damages arising from the implementation of any of the measures required by and/or contained in this Program.

#### 8.1 Authority to Abate Cross-Connection

In the event the cross-connection is not abated within the prescribed time, water service to the premises will be discontinued immediately. Alternatively, if the General Manager or designated representative determines that the service should not be interrupted, the District may hire a contractor to abate the cross-connection by means of installing an approved backflow prevention assembly. In such event, the District will bill the property owner for all costs and administration incurred in accordance with the current Master Fees and Charges Schedule.

## 9 BACKFLOW INCIDENT INVESTIGATION

When a taste, color, or odor complaint is received, the person responding should try to gather as much relevant information as possible by using the District's asset management software program. While it is important to get a good description of the problem, the person receiving the complaint should refrain from suggesting potential causes, as people generally tend to agree with a suggestion rather than assessing the real problem.

Once an inquiry has been received and as much information gathered, the District will determine what response is appropriate under the set of conditions. For instance, if there was only one inquiry, the response would likely be somewhat different than if there are multiple complaints from the same area. However, no matter how many reports are received, there are certain minimum steps that should be taken:

- 1. A District employee will visit the site of the complaint to examine the water.
- 2. The District employee will perform pH and chlorine residual tests. The pH and chlorine tests are good immediate indicators of potential problems, and if the results indicate a potential problem, a bacteriological analysis should also be completed.
- 3. The City of Bellingham, and Eurofins (formerly Edge Analytical, located at 805 W. Orchard Drive, Suite 4, in Bellingham) will test samples quickly and on short notice, including weekends or evenings, in the event of an extreme emergency (see Appendix D for water sampling procedures).<sup>2</sup>

### 10 records and reports

An adequate record system is essential for the operation of a backflow prevention program. These records form the basis for any enforcement action by or legal defense of the District, as well as providing a basis for comparing test results of different backflow assemblies. The backflow testing management software will consist of:

- A. A separate file will be established for each customer account number that requires the installation of a backflow prevention assembly.
- B. The following information will be maintained in each file:
  - Digital record of all cross-connection control correspondence with the customer

CROSS-CONNECTION CONTROL PROGRAM LAKE WHATCOM WATER & SEWER DISTRICT

<sup>&</sup>lt;sup>2</sup> For samples dropped off at Eurofins's Bellingham laboratory that require analysis at the Eurofins Burlington laboratory, samples must be dropped off by 3:30 p.m. (Monday-Thursday) and by 2:30 p.m. (Friday).

- Digital record of health hazard evaluation reports, complete with field drawings
- Digital record of backflow prevention assembly test reports for all assemblies
- C. All backflow prevention assembly test report forms will be entered into the backflow testing software that tracks assembly testing and dates of tests.
- D. Backflow prevention assemblies that are replaced will confirmed to be on the list of approved assemblies. If the assembly does not appear on the list, the customer will be issued a letter notifying them that the installed assembly is not approved and corrective action is required.
- E. A master list of service connections and/or customer's premises where approved backflow prevention assemblies protect the water system from contamination, and the assessed hazard of each connection. These records will be kept for as long as the premises poses a cross-connection hazard to the water system.
- F. Inventory information on:
  - Approved air gaps installed in lieu of approved assemblies, including exact location, assessed hazard, installation date, history of health hazard evaluations, inspection results, and person conducting inspections
  - Approved backflow prevention assemblies including exact location, assembly description (type, manufacturer, model, size and serial number) assessed hazard, installation date, history of health hazard evaluations, tests and repairs, test results, and the BAT performing the tests
  - These records will be kept on file for the life of the backflow prevention assembly
- G. An annual Cross-Connection Control Summary report and Backflow Incident report will be made available to DOH upon request. This report will describe the status of this Program, as well as record of any backflow incidents. These records will be kept on file for a minimum of five (5) years.

AWWA. 2024. Backflow prevention and cross-connection control: recommended practices, manual M14, fifth edition. Published by the American Water Works Association. February 9, 2024.

DOH. 2024. Publication No. 331-743. Unapproved auxiliary water supplies. Published by the Washington State Department of Health. January 12, 2024.

DOH. 2023. Publication No. 331-355. Cross-connection control rules and definitions. Published by the Washington State Department of Health. February 2023.

RCW Chapter 19.27. Revised Code of Washington. State building code.

RCW Title 57. Revised Code of Washington. Water-sewer districts.

USC. 2009. Manual of cross connection control, tenth edition. Published by the University of Southern California Foundation for Cross-Connection Control and Hydraulic Research. October 2009.

WAC Chapter 51-04. Washington Administrative Code. Policies and procedures for consideration of statewide and local amendments to the state building code.

WAC Chapter 51-56. Washington Administrative Code. State building code adoption and amendment of the 2021 edition of the uniform building code.

WAC Chapter 246-290. Washington Administrative Code. Group A Public Water Systems.

WAC Chapter 246-292. Washington Administrative Code. Waterworks Operator Certification.

# APPENDIX A RESOLUTION NO. 902

## APPENDIX B

CROSS-CONNECTION CONTROL HAZARD SURVEY REPORT

### **Cross-Connection Control Hazard Survey Report**

Survey date:	<del></del>			
Customer Informa	ntion			
Customer Name:		Telepho	ne:	
ddress:ZIP:				
Contact person:				
Description of premis	ses:			
Description of water	use:			
Water Service and	Backflow Prevention	on Assembly (B	PA) Size/Type	
			1	1
Service Type	Service Size	Meter Size	BPA Size	BPA Type
Domestic				
Fire				
riie				
Irrigation				
Other				
Other				
	1			
Cross-Connection	Control Specialist (	CCS) Information	on	
Name:		Telephor	ne:	
Company name:				
Address:			ZIP:	
OOH CCS Certification	on #:	Year ce	rtified:	

#### **Survey Results**

Note: The CCS's survey shall include an inspection of the premises isolation assembly to verify that it is installed correctly and is a currently listed DOH-approved assembly.

Item	Location & Description of Cross Connection	Backflow Prevention Required
urveyor's Comm		

#### **Surveyor's Recommendations**

I certify that this cross-connection hazard survey accurately reflects the overall risk posed by the customer's plumbing system to the District's distribution system. Based on the above survey, I certify that:

1. I found the following type(s) of premises isolation backflow preventer(s):
Air Gap RPBA/RPDA DCVA/DCDA None
2. The existing backflow preventer(s) is/are properly installed.
Yes No N/A
3. The existing backflow preventer(s) is/are commensurate with the degree of hazard:
Yes No N/A
4. Since no backflow preventer was installed for premises isolation, the premises owner should install a premises isolation backflow preventer of the following type:
Air Gap RPBA/RPDA DCVA/DCDA N/A
5. The premises owner should replace the existing premises isolation backflow preventer(s) with the following:
Air Gap RPBA/RPDA DCVA/DCDA N/A
The completed survey report shall be first signed by the CCS conducting the survey, and then countersigned by the owner of the premises or the owner's authorized agent.
CCS Signature:Date:
As the Owner of the Premises (or Owner's authorized agent), I certify that I have received a copy of this completed Cross-Connection Control Hazard Survey Report.
Signature:Date:
Note: Customers and regulatory agencies should be aware that the District's

Note: Customers and regulatory agencies should be aware that the District's requirement for this cross connection hazard survey and/or for the installation of a specific backflow prevention assembly on a service pipe *do not* constitute an approval of the customer's plumbing system, compliance of the customer's plumbing system with the Uniform Plumbing Code or an assurance of the absence of cross connections in the customer's plumbing system.

## APPENDIX C NEW CUSTOMER PERMIT APPLICATION PACKET

## APPENDIX D WATER SAMPLING PROCEDURES

THE WHATCOM	Water Sampling Procedure	SOP #	WATER-6
		Revision #	1
	Frocedure	Implementation Date	May 22, 2025
SEWER DIST	<b>Bact-T &amp; Coliform</b>		
# of Pages	2	Last Reviewed/Update Date	
SOP Owner		Approval	

#### **Procedure**

	959101 – Geneva & Sudden Valley	
PWS ID Number	081181 – Eagleridge	
	52957B – Agate Heights	
	047828 – Johnson Well	

#### Preparation of the Sample Bottle

- 1. Select the most appropriate sampling point. Remove any aerators, screens, hoses, or filters from the cold water faucet.
- 2. Disinfect the tap with liquid chlorine.
- 3. Let the water run freely for at least five (5) full minutes.
- 4. Take chlorine residual.

#### Collection of the Sample

- 1. Hold the sample bottle near the bottom with one hand and unscrew the cap with the other. Do not rinse out the powder in the sample bottle, it is supposed to be there. Hold the cap near the top edge in one hand and the sample bottle in the other.
- 2. DO NOT touch any part of the cap that touches the bottle, or set the cap down, or let anything touch the cap.
- 3. Hold the sample bottle under the stream of water about an inch below the bottom edge of the water spout. DO NOT adjust the flow once you have started filling the sample bottle. Fill the sample bottle to the shoulder or 100 ml fill line but do not let the sample bottle overflow.
- 4. After the sample bottle is filled to the correct level, remove it from under the flow and immediately place the cap on the bottle and screw it down tightly.

#### Post Sampling Procedure

- 1. Shut off the cold water faucet.
- 2. Replace any attachments that were removed from the faucet.
- 3. Check to be sure the lab slip is correctly and completely filled out.
- 1. Water system ID number
- 2. Water system name
- 3. Collection date and time the sample was taken
- 4. Type of sample: Check ONLY ONE Type:
  - Compliance
  - Investigative
  - Raw
  - Special request
- 5. Sample location (street address or other type of location identifier)
- 6. System type (Group A or B)
- 7. Bottle number and date
- 8. Write in chlorine residual number
- 9. Attach the lab slip to the sample bottle with a rubber band.
- 10. Make a copy of lab slip (on blue paper) and put it in WTPO's box
- 11. Take a custody sheet with you to the Lab for them to sign
- 12. Place the sample in a cooler with an ice pack.
- 13. Transport the sample to the lab within 30 hours of the time of collection.

#### Water Sample Labs

Eurofins	Eurofins	City of Bellingham
1620 S. Walnut St.	Suite 4	Attn. Technical Supervisor
Burlington, WA 98233	Bellingham, WA 98225	778-7850
800-755-9295	888-725-1212	733-9178
360-757-1400	360-715-1212	Have Post Point Wastewater
	micro@edgeanalytical.com	Treatment Plant contact Peg
		Wendling at home and arrange
		for testing