

Illinois Cross-Connection Control Program

Purpose: The Cross-Connection Control Program in Illinois is one of several tools intended to protect water consumers in the state. Section 18 of the Illinois Environmental Protection Act (P.A. 89-445, eff. 2-7-96; 90-773, eff. 8-14-98) and 35 Ill. Adm. Code 607.104 provides the Illinois Environmental Protection Agency (EPA) direction from both the Illinois legislature and Illinois Pollution Control Board. These statutes establish that no person can threaten a water supply and that water supply officials are responsible for protecting their water mains from connections that have the potential to allow the backflow of contaminants into their respective distribution systems. Further, 35 Ill. Adm. Code 602.115 gives the Illinois EPA authority to develop and modify “Agency” regulations regarding cross-connection control at community water supplies. These regulations have been developed and modified under 35 Ill. Adm. Code 653.802 and 653.803. These “Agency” regulations outline what comprises a viable Cross-Connection Control Program.

You're not in this alone: Water supplies in Illinois have significant partners in the implementation of their Cross-Connection Control Program. While it is up to the Illinois EPA to ensure that community water supplies have viable programs through physical inspection of water treatment facilities and documentation reviews, the Illinois Department of Public Health (DPH) deals with the plumbing aspects of the program. Specifically, 77 Ill. Adm. Code 890 provides regulatory requirements for backflow prevention devices and 225 ILCS 320 provides the Illinois Plumbing License Law. Furthermore, the Environmental Resources Training Center (ERTC) located at Southern Illinois University-Edwardsville provides for the training of licensed plumbers who wish to become certified Cross-Connection Control Device Inspectors (CCCDI). While any Illinois licensed plumber can inspect plumbing or install a backflow device or assembly, only an Illinois CCCDI can test that device or assembly. Additionally, the Illinois EPA relies upon the ERTC to track and properly credential CCCDIs.

What makes a program? Normally, the Illinois EPA, Division of Public Water Supplies (DPWS), evaluates all community water supply cross-connection control programs during routine engineering evaluations of each system. A viable program *consists* of an ordinance, an ongoing survey of the distribution system service connections, identification of at risk service connections, mitigation of recognized risks via a plumber/CCCDI, and documentation. Quite simply, to verify the effectiveness of each water system's Cross-Connection Control Program the Field Operations Section of the DPWS normally evaluates the following questions:

- 1) Does the system have a Cross-Connection Control Ordinance?
- 2) Does the system survey the service connections on its distribution system and at what frequency?
- 3) Does the system receive reduced pressure backflow preventer annual test reports?
- 4) Does the system have an adequate tracking procedure whereby test reports and high risk service connections are tracked?
- 5) Does the system ensure that devices within its water treatment facility are properly tested on an annual basis?
- 6) Are there any locations within the water treatment facility that should have backflow protection that do not?

What to expect if your program is lacking: In terms of corrective action, if a system does not have an ordinance, has no information on file relative to a survey of its distribution system, cannot produce reports on reduced pressure backflow devices, or cannot show that devices within its facility have been tested annually, it is safe to say that the system does not have an active and effective program. These situations are normally cited in either a noncompliance advisory letter or a violation notice to the water supply as violation(s) of 35 Ill. Adm. Code 607.104(a) and (b).

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For additional regulatory information:

Illinois EPA Regulations at: <http://www.ipcb.state.il.us/SLR/PCBandIEPAEnvironmentalRegulations-Title35.asp>

Illinois DPH Regulations at: <http://www.idph.state.il.us/rulesregs/rules-indexbytopic.htm#PRIVATE%20WATER%20SUPPLIES>

For CCCDI Training and Certification Information: <http://www.siue.edu/ertc/>