Proposed changes to the

Cross-Connection Control Policy Handbook (CCCPH)

Last Updated: March 2025

This document will be updated to document any changes made to the CCCPH. The CCCPH (link to CCCPH) will not include any change-tracking. The date of this document is the most recent version and includes all previous updates to the CCCPH. All sections referred to in this document are in the CCCPH – no other regulations or documents are changed in this document.

Proposed Changes to the CCCPH

Revision

Section 3.2.1(e)(6): if the State Water Board requests a hazard assessment of a user's premises; ~~and~~ or

Purpose and reason

The State Water Board has identified that the list in Section 3.2.1(e) contains a set of criteria that should be governed by an "or" statement instead of an "and" statement. The list contains seven conditions that may result in a new hazard assessment. As written, the list requires all seven conditions to occur before a new hazard assessment is necessary. The State Water Board intended for any of the conditions, when met, to result in a new hazard assessment. Requiring all seven conditions to occur effectively renders the subsequent hazard assessment requirement useless.

Revision

Section 3.4.1(d): ~~An American National Standards Institute (ANSI)-accredited certifying organization, accredited in accordance with subsection (b) and ISO/IEC 17024,~~ A certifying organization, accredited by the American National Standards Institute (ANSI) in accordance with ISO/IEC 17024, which complies with subsection (b), will be considered to be a State Water Board-recognized certifying organization.

Purpose and reason

The Backflow Prevention Assembly Tester Certification requirement in Section 3.4.1(d) is effectively identical to the Cross-Connection Control Specialist Certification requirement in Section 3.4.2(d), but the language between the two sections is dissimilar enough such that unnecessary confusion may arise when comparing the two sections, and the change eliminates that dissimilarity.

Revision

Section 3.1.1: “Air-gap separation” or “AG” means a physical vertical separation of at least two (2) times the effective ~~pipe diameter~~ opening, as defined in section 207.0 of the California Plumbing Code, between the free-flowing discharge end of a potable water supply pipeline and the flood level of an open or non-pressurized receiving vessel, and in no case less than one (1) inch.

Purpose and reason

The definition of an air-gap separation in section 3.1.1 is inconsistent with the air-gap criteria in Appendix B; specifically, when describing the necessary vertical distance in an air-gap, the definition in 3.1.1 refers to an “effective pipe diameter“ and Appendix B refers to an “effective opening.” The “effective pipe diameter” definition could be misconstrued to mean the outer pipe diameter and also not inclusive of air-gaps using multiple pipes. This change should prevent any air-gap installations being designed with inadequate gaps.

Revision

3.3.2(b): RPs must be installed such that the lowest point of an assembly is a minimum of twelve inches above grade, and, unless an alternative is approved by the PWS, a maximum of thirty-six inches above the finished grade~~, unless an alternative is approved by the PWS,~~.

Purpose and reason

Section 3.3.2(b) states that the minimum installation height for an RP is 12 inches. Section 3.3.2(b) also states that the maximum installation height for RP devices is 36 inches unless an alternative is approved by the PWS, in which case the installation height may be more than 36 inches. The existing language in the CCCPH is written in a way that could be interpreted to allow for alternatives to *both* minimum and maximum height. This change clarifies that the alternative only applies to maximum height.

Revision

3.1.3(a)(2): Cross-Connection Control Program Coordinator – The PWS must designate at least one individual involved in the development of and be responsible for the reporting, tracking, and other administration duties of its cross-connection control program. For a PWS with ~~more than~~ 3,000 service connections or more the Cross-Connection Control Program Coordinator must be a cross-connection control specialist.

Purpose and reason

This change will make the service connection threshold consistent throughout the CCCPH. The State Water Board reviewed its drinking water inventory and found that no existing public water systems have exactly 3,000 service connections, so there should be no effect from this change to public water systems, other than a public water system that is approaching 3,000 service connections will cross the threshold one connection earlier than before.

Previous Changes to the CCCPH

March 2025

Revision

Section 3.2.1(f): Noncommunity water systems must conduct an initial or follow-up hazard assessment within two years of the ~~adoption~~ effective date of the CCCPH.

Section 3.2.2(e): Except as noted below, a PWS must ensure its distribution system is protected with no less than DC protection for a user premises with a fire protection system within ten years of ~~adoption~~ the effective date of the CCCPH.

Section 3.2.2(e)(2): For existing fire protection systems that do not meet Section 3.2.2 (e)(3) or cannot install DC protection within ten years of ~~adoption~~ the effective date of the CCCPH…

Purpose and reason: The State Water Board is changing the use of “Adoption Date” in the CCCPH to “Effective Date”. When the CCCPH was adopted the State Water Board included a six-month gap between the adoption date and the effective date. The State Water Board intended for all instances of deadlines associated with “Adoption Date” to be replaced with “Effective Date”, but not all instances were changed prior to CCCPH adoption; this change to the CCCPH will correct those errors.