

Water System FAQ for the Cross-Connection Control Policy Handbook (CCCPH)

Who do Public Water Systems (PWSs) submit Cross-Connection Control Plans (Plans) to?

PWSs must submit Plans to their local Division of Drinking Water (DDW) District Office or Local Primacy Agency (LPA).

Contact information for DDW District offices can be found on the DDW Website:

https://www.waterboards.ca.gov/drinking_water/programs/documents/ddwem/DDWdistri ctofficesmap.pdf

Contact information for LPAs can also be found on the DDW website:

https://www.waterboards.ca.gov/drinking_water/programs/documents/web_contact_info_district_lpa.pdf

Who do PWSs submit Plan deadline extensions to?

PWSs must submit deadline extension requests to their local DDW District office or LPA.

What if a PWS cannot adopt operating rules, ordinances, bylaws, or a resolution for implementation of the cross-

connection control program by July 1, 2025?

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The CCCPH does not require the legal authority to be adopted prior to Plan submission. The PWS may submit a Plan with a draft version of its legal authority by the July 1, 2025, deadline. If the legal authority cannot be finalized by the Plan deadline, the PWS must provide a description of the process and timeframe for finalizing its legal authority in the Plan. If the PWS feels it cannot submit its Plan without adoption or approval by its governing board, it should reach out to its local DDW District office or LPA for guidance or direction.

What if the PWS cannot submit a plan by July 1, 2025?

You may request an extension for the plan submittal date which may be granted upon review by the local DDW District office or LPA. In your request for extension, you must specify the reasons for the extension request and should propose a timeline for plan submittal.

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Where can I find information regarding training courses and/or applications for tester/specialist certifications?

Contact one of the certifying organizations for information regarding training courses and applying for a tester or specialist certification.

Which organizations can testers and specialists obtain certifications with?

A list of state-recognized certifying tester organizations is posted on the CCCPH website:

https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/docs/2025/testers.pdf

A list of state-recognized certifying specialist organizations is also posted on the CCCPH website:

https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/docs/2025/specialist.pdf

Is a specialist's designee required to have a certification?

The CCCPH does not require that the specialist's designee have a certification, but the designee should be familiar with the water quality and emergency response for the water system. The State Water Board recommends the designee is only used for short-term absences of the specialist.

Certifying Organizations – When do they need to have ANSI accreditation?

Certifying organizations, which certify backflow prevention assembly testers and crossconnection control specialists, do not need to have a certification from an ANSI accredited organization until July 1, 2027. While they can have a certification from an organization with ANSI accreditation before then, it is not a requirement. Between July 1, 2026, and July 1, 2027 (when ANSI Accreditation is required), the State Water Board will recognize organizations that plan to have ANSI accreditation but do not yet have it and which meet the requirements listed in the CCCPH.

What is the deadline for the initial hazard assessment for community water systems?

Community water systems do not have a set deadline for completing the initial hazard assessment. Community water systems are required to propose a timeframe and deadline for completing this in the Cross-Connection Control Plan.



Do PWSs have to perform in-person hazard assessments on residential connections?

Community water systems must perform hazard assessments on all user premises in their service area, while noncommunity systems must perform hazard assessments of their water distribution systems. A distribution system includes pipes, tanks, pumps, and other components that deliver water from source or treatment to the consumer, which includes residential connections in a noncommunity system's service area.

While a hazard assessment is required for residential connections, a physical, in-person assessment does not need to be performed at every residential connection. Hazard assessments can be conducted using alternative methods such as GIS, building records, and customer surveys. However, if the findings from an alternative method are inconclusive or show a potential hazard, then a physical hazard assessment may be necessary.

How long do PWSs have to complete initial hazard assessment? What duration is allowed between hazard assessments?

Due to the vast size variations in water systems across the state, except for noncommunity systems, the CCCPH does not specify an exact completion date for initial hazard assessments for community water systems. Community water systems must determine their ability to complete hazard assessments in a timely manner based on their available resources, number of connections, and complexity within their service area.

Some may be able to complete them in a manner of months, while other systems will need a number of years to complete the hazard assessment, but each community water system will need to determine and justify their proposed timeline. Noncommunity water systems must complete their initial hazard assessment no later than July 1, 2027.

Similarly, the CCCPH does not specify a time between hazard assessments but does specify criteria under which another hazard assessment must be completed. These criteria are listed in the CCCPH in section 3.2.1(e), which includes periodically. meaning for service connections that have not had another hazard assessment triggered by one of the criteria listed in 3.2.1(e), then the water system must state a frequency in their plan.



Is there a template available for conducting hazard

assessments?

The State Water Board does not have a template for hazard assessments. Crossconnection survey forms can be used for hazard assessments. Example forms or a description for conducting a hazard assessment or a cross-connection survey can be found in some industry guidance manuals, such USC's Manual of Cross-Connection Control, 10th Edition, AWWA M-14 Manual, IAPMO Backflow Prevention Manual, 3rd Edition, and the EPA Cross-Connection Control Manual (2003).

Is there a format or style for Cross-Connection Control (CCC) Plans that PWS need to follow or can use?

There are no format or style requirements in the CCCPH, just content requirements. A CCC Plan may be a collection of documents, files, or plans that water systems already have, are yet to be developed, or a combination of both. However, the CCC Plan needs to be presented in a clear and organized format. Given the various size, complexity, and legal structure of water systems across the state, DDW has not developed a functional template for community water system plans.

What are the CCCPH plan requirements for a new PWS?

Upon the effective date of the CCCPH, which was July 1, 2024, DDW and LPAs cannot issue a permit for a new PWS, until the PWS has submitted and received approval of its CCC Plan by their local DDW District office or LPA.

Additional Resources

More information on this can be found on the CCCPH website.

https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/cccph.html

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