

NEW YORK CITY ENVIRONMENTAL PROTECTION

BUREAU OF WATER AND SEWER OPERATIONS

CROSS CONNECTION CONTROL PROGRAM

SEMI-ANNUAL REPORT

JANUARY 1<sup>st</sup> TO JUNE 30, 2011

JULY 22, 2011

**Prepared in accordance with Section 8.2 of the July 2007 United States Environmental Protection  
Filtration Avoidance Determination**

**Prepared by:**

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During the first half of 2011, the Agency's Cross Connection Control Program continued to exceed (100% to 1000%) the revised calendar year milestones which were established in the July 2007 United States Environmental Protection Filtration Avoidance Determination, and are being presented for this semi-annual reporting period.

So far this year, DEP saw the completion of a contract to retain the services of a consulting engineering firm to perform cross connection control inspections, review plans for new installations, and prepare enforcement notices and correspondence as required for both USEPA and State DOH compliance. The primary purpose of this contract was to complete over the course of the one year contract, the inspections of the properties originally designated as potentially hazardous from the list generated in 1998 utilizing NYC Department of Finance use-type records. This contract was awarded in October 2009 and the work for the contract began on the 19<sup>th</sup> of January 2010. The contract ended on Jan. 19, 2011. The number of inspections and reviews performed by staff and the consultants are included in the summaries of the totals entered into the table. The contract sparked a large number of requests for re-inspection and assessment.

At the end of the backflow contract, DEP was in a position where there were a large number of plans that were coming in for review. In addition to conducting detailed internal premises inspections of potentially hazardous facilities, DEP is performing inspection of some locations classified as aesthetically objectionable, all of which are recorded in the Cross Connection Control database. Changes to the NYC Building Code have facilitated the need to check all fire sprinkler services for proper protection. The Plumbing Code requires fire sprinkler services to have the minimum protection of a Double Check Detector Assembly or DCDA. A greater level of protection could be necessary if the sprinkler contains any chemical treatment for the prevention of freezing or corrosion control.

The Department has established an email address ([backflow@dep.nyc.gov](mailto:backflow@dep.nyc.gov)) to be used to receive their inquiries from small businesses and the public relating to compliance requirements. Also, a new address has been created to accept request for waivers from using an approved backflow prevention device (BPD) when using a fire hydrant as a temporary source of water. [Hydrantwaiver@dep.nyc.gov](mailto:Hydrantwaiver@dep.nyc.gov) is now available for non-profit organizations and community garden associations to obtain a waiver from the requirement of using an approved BPD whenever a fire hydrant is used for a watering station (as was issued to the NY Road Runners Association) or for small community garden organizations that cannot afford to hire a plumber and obtain an approved BPD just to water a small green space or community garden. The organization must demonstrate that the City's water supply will be protected from potential backflow when operating the hydrant, and their applications are processed and evaluated on a case by case basis.

In the past six months, the Bureau has not had to respond to any incidents as they relate to a potential cross connection or backflow condition. There have been several educational and outreach presentations to plumbing, building, real estate, and engineering industry groups on the changes and requirements regarding cross connection prevention and the need for the appropriate backflow prevention device.

In summary, the Bureau's rigorous oversight and regulation of Cross Connection Control activity, the substantial inspection program, and the additional work performed by the consultant continue to provide an excellent level of protection of the City's public water supply system. The Cross Connection Control Unit strives to provide a dynamic program with constant improvements by utilizing the following framework and direction in our tenets:

- 1) The immediate surveillance and inspection of all premises in a given area to determine the degree of hazard posed by a potential cross connection event when facilitated by an emergency, notification or request.
- 2) There are no approvals or issuance of a Permit for a new wet connection or 2 inch tap without a review for approval, or an exemption (variance) issued by the Cross Connection Control Unit (CCCU) of the Bureau.
- 3) The swift assessment of plans submitted for review and approval to the NYC Department of Environmental Protection (DEP), which eliminates the need for applicants to submit their cross connection device plans to the New York State Department of Health for sign-off.
- 4) No approval for Permit of a wet connection or 2 inch tap will be issued without a review or exemption issued by the Cross Connection Control Unit (CCCU) of the Bureau.
- 5) Electronic records of the proper installation, including the initial testing of all approved devices as well as the annual testing of any cross connection control containment device are collected, tracked, and maintained by the CCCU of DEP.
- 6) Regularly scheduled outreach and informational sessions, PowerPoint presentations, hand-outs, and dialogues with Professional Engineers, industry groups and plumbing industry professionals regarding any changes in the DEP cross connection control policy and procedures are on-going.

Annual and Semi-Annual Periods	Responding to Incidents	Facility "Hazardous" Inspections	Enforcement Initiated for "Hazardous" Premises	Backflow Preventer Plans Approved	Backflow Preventer Plans Accepted with Self-Certification (Exemptions)	Exemption Requests Processed	Notices of Violation Issued for Failure to Test Annually
Jan. - Dec. 2007	4	4232	1122	2120	44	1290	532
Jan. - Dec. 2008	0	3207	1124	2642	12	1160	586
Jan. - Dec. 2009	0	2812	1064	3021	0	792	568
Jan. - Dec. 2010	3	9262	2887	3280	1	472	474
Jan. - June 2011	0	1515	1691	4605	14(4)	177	57
<b>FAD Requirement</b>	<b>1-2/yr</b>	<b>300-450/yr</b>	<b>225/yr</b>	<b>400/yr</b>	<b>TBD*</b>	<b>400/yr</b>	<b>200/yr</b>

\* To be determined.  
No established level  
of response

NOVs have  
decreased  
due to  
resource  
issues. (less  
staff)

Exemption  
submissions  
have waned  
due to new  
fee schedule