

Backflow Prevention: Michigan's Program for Protecting Drinking Water

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Outline

- Why the rules are necessary
- Basic concepts
- Brief history backflow prevention regulations
- Who the rules apply to
- Program basics
- Useful references

What do these things have in common?

- Lawn sprinkling system
- Metal plating factory
- Air conditioning system
- Home water purification system

All have caused illness or death by accidently contaminating a public water supply!

Why are these rules necessary?

To protect public health

What is a Cross-Connection?

- "A connection or arrangement of piping or appurtenances through which a backflow could occur."
- "Any piping arrangement which allows a potable water system to be connected to a non-potable system."

Backflow

- The undesirable reversal of flow of water or other substances into the potable water distribution supply.
- It can be caused by:
 - o Backsiphonage
 - Backpressure

History of Michigan's Drinking Water Regulations

The Waterworks and Sewerage Systems, Act 98, P.A. 1913

- Promulgated August 15, 1913
- Department of Health authority
- Included water supply

First Cross Connection Rules

- December 1938: x-conn regulations adopted by the Advisory Council of Health
- No connection shall be installed or maintained between a potable public supply and pipes, pumps, or tanks supplied or possible of being supplied, from any non-potable source
- December 1938: first x-conn regulations adopted by the Advisory Council of Health
- April 1972: x-conn rules were promulgated into Act 98
- Very similar to today's rules
- Definitions, cross connections prohibited, required local programs, protective devices, annual reporting, piping identification, etc.
- 1974: Federal Safe Drinking Water Act
- 1976: Michigan Safe Drinking Water Act (Act 399) became effective Jan 4, 1977
- 1978: 1972 x-conn rules adopted by reference into Act 399
- Part 14 Cross Connections

Cross Connection Rules Manual

- 1st Edition was published in March 1977 to supplement the 1972 x-conn rules
- 2nd Edition October 1982
- 3rd Edition April 1999
- 4th Edition October 2008

Michigan Plumbing Code

- Regulates design and installation of plumbing systems
- Intended to protect public health, safety, and welfare
- Adopts the International Plumbing Code
- Chapter 6 Water Supply

Who do the Rules Apply to?

<u>Directly</u> → Public Water Supplies

- Municipalities
- Condominium Associations
- Apartments

How it Works

- 1. DEQ requires the utility to have a formal program
 - Sanitary surveys
 - Surveillance visits
 - Approval of written program
 - Annual report form
- 2. Local utility requires customers to comply
 - Cross connection inspections
 - Public education
 - Testing/Inspection notices
- 3. Code inspector requires new construction to conform

How it is enforced

- Act 399: State can impose fines, public notification, escalated enforcement on water suppliers
- Local water ordinance: Water utility can impose fines and ultimately terminate water service
- Michigan Plumbing Code: Local inspector can deny approval of new plumbing work

Common Inspection Findings

- No Air Gap
- Improperly Installed Backflow Preventer
- Wrong Backflow Preventer for Application
- Missing Backflow Preventer

- Unapproved Backflow Preventer
- Illegal Bypass
- Unapproved Device
- Soap Dispensers

Approved Backflow Preventers

- Must meet ASSE or SA Standards
- Required by Plumbing Code
- Required Standards are listed in Cross Connection Rules Manual and MI Plumbing Code

Cross Connection Control Program Basics

Water Utility Duties:

- Inspect water customers for cross connections
- Inform customers of testing requirements
- Review and track testing results
- Enforce non-compliance
- Maintain records
- Report efforts to DEQ

Commonly Asked Questions

- 1. When must a backflow preventer be tested?
 - At installation



- Following repairs
- Following relocation
- In accordance to the local program
- 2. Who can test a backflow preventer?
 - A tester with a valid ASSE 5110 certification

Note: Must be a licensed plumber to install and repair

Common Goal - Work Collaboratively

Hints for success

- Knowledgeable local inspectors
- Transparency share information
- Promote consistency
- Challenge questionable testing practices

Common Misconceptions

- Utilities profit from enforcing requirements
- These rules aren't required in other communities
- Backflow doesn't really occur
- These rules have never been required before
- Safe drinking water is the utility's responsibility not an employer's.

Containment Example

Protects the water supply, but not the building occupants

Isolation Example

Protects the building occupants & the water supply

Isolation vs. Containment

- **ISOLATION**
 - o Preferred because in plant personnel are protected.
 - o Smaller size devices or no devices required
 - o Often cheaper
 - Educational for plant personnel, managers, & owners

CONTAINMENT

- Facility is contained (separated from public system)
- Frequent plumbing changes
- Untraceable or hidden plumbing
- Confusing plumbing
- o Access to facility is refused or prohibited by owner
- Facility employees may not be protected

Future Challenges

- Limited resources
- Maintaining expertise
- Controlling residential cross connections
- Increased public/media scrutiny of tap water
- Mitigating liability
- Regressive legislation

Resources

Google search the following:

- "MDEQ Community Drinking Water"
- "State of Michigan Plumbing Division"
- "American Backflow Prevention Association"
- "EPA Cross Connection Manual"
- "AWWA Manual M14"
- "ASSE Plumbing"
- "MPMCA"

Questions?

