

BOLINAS COMMUNITY PUBLIC UTILITY DISTRICT



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MEMORANDUM

TO:	Board of BCPUD Directors
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FROM:	Georgia Woods, General Manager
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RE:	<i>Review & Proposed Amendments to Ordinance No. 28 (Cross-Connection Control)</i>
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TO:	November 19, 2025
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Background

California has adopted significant updates to its cross-connection control regulations through the Cross-Connection Control Policy Handbook (CCCPH), which became effective July 1, 2024. These updates replace and expand the long-standing requirements under Title 17, Sections 7583–7605 of the California Code of Regulations. The goal is to strengthen protections for public water systems against contamination from backflow and cross-connections.

New Statutory Requirements

Under the CCCPH, all Public Water Systems (PWS), including BCPUD, must comply with the following key requirements:

- **Cross-Connection Control Plan (CCC Plan):**
A written plan must be submitted to the State Water Resources Control Board (SWRCB) by July 1, 2025 (we got an extension until December 31, 2025).
The plan must include:
 - Hazard assessment process and timelines
 - Procedures for annual testing and tracking of backflow prevention assemblies
 - Enforcement and corrective action protocols
 - Recordkeeping systems for inspections, maintenance, and compliance

- Contact information for certified cross-connection control personnel
- Hazard Assessments:
A full hazard assessment of the water system must be completed by July 1, 2026.
- Program Elements:
The CCCPH introduces detailed standards for device installation, testing, and reporting, as well as requirements for public education and customer notifications.

Failure to comply may result in enforcement actions, including penalties or loss of permit authority. [\[waterboards.ca.gov\]](https://www.waterboards.ca.gov)

Tonight's Discussion

- We are presenting BCPUD Ordinance 28, which governs our existing cross-connection control program.
 - Staff has prepared suggested amendments to Ordinance 28 to better reflect how we currently implement the program (e.g., clarifying cost and fees associated with the program).
 - No action will be taken tonight—this is for review and discussion only.
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Next Steps

- December Board Meeting:
 - We will bring the amended Ordinance 28 back for formal adoption.
 - We will also present the draft Cross-Connection Control Plan for Board approval to submit to the State Water Board by December 31, 2025.
- January 2026 and Beyond:
 - After submission, the State Water Board will review our plan and provide feedback.
 - Implementation of the new plan will begin in early 2026.
 - Once we have clarity on how the plan changes our operational practices, staff will draft a new ordinance to repeal and replace Ordinance 28 to align with the overhauled program.