



Bolinas Community Public Utility District

Cross-Connection Control Plan

*Small Community Water System (201–999 connections) —
Prepared for State Water Board Review*

Prepared by District General Manager, Georgia Woods
gwoods@bcpud.org

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Bolinas Community Public Utility District (BCPUD)

Cross-Connection Control (CCC) Plan

Public Water System Information

Public water system name:	Bolinas Community Public Utility District (BCPUD)
Public water system number:	CA2110005
Number of single-family residential service connections:	540
Number of multifamily residential service connections:	17
Number of commercial service connections:	29
Number of industrial service connections:	0
Number of agricultural irrigation service connections:	1
Water system ownership type:	Public

Purpose and Compliance Statement

To comply with **Section 3.1.4 of the [Cross-Connection Control Policy Handbook \(CCCPH\)](#)**, each public water system (PWS) must submit a written **Cross-Connection Control (CCC) Plan** to the State Water Resources Control Board for review. This plan describes BCPUD's program for preventing backflow and protecting the public water supply from contamination.

The **CCCPH** is the State Water Board's official policy document that establishes statewide requirements for cross-connection control programs, including:

- Legal authority and enforcement
- Hazard assessments and timelines
- Backflow prevention assembly installation and testing
- Certification standards for testers and specialists
- Recordkeeping and reporting requirements

This plan is based on the State Water Board's template for small community water systems (201–999 connections). Completing and submitting this plan does **not guarantee approval** by the State Water Board; approval is contingent upon meeting all applicable requirements and addressing any comments provided during review.

CCC Legal Authority

Legal authority type:

- Ordinance (BCPUD Ordinance 28)
- Adopted by BCPUD Board of Directors on 11/16/1994; amended 12/17/2025

Attachment:

BCPUD Ordinance 28 (as amended), providing authority for installation, annual testing, enforcement, and service termination for noncompliance.

Required location(s) of backflow protection:

At the meter/service connection (premises isolation), unless internal protection is determined necessary for a specific hazard.

Corrective actions for noncompliance:

- Administrative letter of noncompliance
- Fines
- Water service shut off for continued noncompliance
- Increased inspection frequency for repeated failures

Cross-Connection Control Coordinator — Contact Information

Two in-house employees have been designated by the General Manager to administer the new CCC Program. Currently, the District Staff does not include anyone with Backflow Certification, though the District does plan to certify a BCPUD Staff member in the Spring of 2026.

Name & Title:	Annie Laufman, Cross-Connection Control Coordinator
Phone:	(415) 868-1224
Email:	alaufman@bcpud.org

Address:	270 Elm Road, Bolinas, CA 94924
Existing or Planned Qualifications:	Experience managing BCPUD's existing BPA Inventory; will be training in CCCPH; will be managing the inventory/testing management and ensuring compliance with our plan. Will <u>not</u> be trained as or receive certification as either a Backflow Tester and/or Cross-Connection Control Specialist.

Name & Title:	Sean Morgan, BPA Field Specialist
Phone:	(415) 868-1224
Email:	smorgan@bcpub.org
Address:	270 Elm Road, Bolinas, CA 94924
Existing or Planned Qualifications:	Certified in Water Treatment and Distribution; will be training in CCCPH; inventory/testing management; device selection and installation criteria. Will be trained as a Backflow Specialist in Spring of 2026; will <u>not</u> be trained as or receive certification as a Cross-Connection Control Specialist.

Hazard Assessments

Certified specialist involvement:

BCPUD will make every effort to secure an American National Standards Institute (ANSI)-recognized and Division of Drinking Water (DDW)-recognized certified cross-connection control specialist by **July 1, 2026**. This specialist will assist with reviewing methodology, verifying high-hazard determinations, and advising on appropriate protection requirements.

***Disclaimer:** Due to BCPUD's rural and isolated location, and the anticipated statewide demand for certified specialists under the new CCCPH mandates, meeting this deadline may be challenging. While we intend to engage such a professional, actual scheduling and completion of work within specified timelines could be affected by supply and demand constraints beyond our control.*

Presence of auxiliary water in service area:

BCPUD does not have any auxiliary water sources in its public system; however, a subset of customers maintains auxiliary sources (including private wells, rainwater catchments, and fire pumps/raw water supplies). Under CCCPH, any such source is treated as a high hazard

unless proven otherwise, requiring backflow protection that meets the highest level of safety. In most cases, this means that BCPUD will require such customers to install/maintain a Reduced Pressure Principle (RP) backflow prevention assembly at the service connection, or an air gap where feasible. (An RP assembly is a mechanical device with two check valves and a relief valve that discharges to the atmosphere if either check fails, providing robust protection against backflow.)

Initial Hazard Assessment — Process & Planned Timeframe:

These dates represent BCPUD's planned implementation schedule and may be adjusted based on program progress, resource availability, and professional service availability. BCPUD is in a rural area, and neighboring districts are also implementing CCC programs, which will likely create supply and demand challenges for certified testers and specialists. Actual timelines will depend on market conditions and customer engagement.

- Phase A (CII (Commercial, Industrial, Institutional) & known BPA (Backflow Prevention Assembly) sites): planned completion by June 30, 2026.
- Phase B (remaining commercial/irrigation/agricultural sites): planned completion by October 31, 2026.
- Phase C (residential sites): planned completion by December 31, 2026 (risk-based prioritization for properties with auxiliary supplies, multi-family, fire sprinklers, irrigation without internal protection).

Hazard Assessment Methods (Residential & Non-Residential):

Step 1: Initial Customer Outreach

- Distribute online survey/questionnaire to all customers
- Provide in-person or phone assistance for customers needing help completing the survey

Step 2: Verification of Responses

- Confirm survey information through:
 - Onsite visit (preferred for high-risk or unclear cases)
 - Phone or email communication (for low-risk or straightforward cases)

Step 3: Document Review

- Review BCPUD service files and County parcel records for indicators of:
 - Auxiliary water sources
 - Plumbing modifications

Step 4: Review of Building Plans submitted to County of Marin (“Plan Check”)

- For properties with new construction, remodels, or system changes, review building/plumbing plans to identify potential cross-connection risks before County of Marin issues approval

Ongoing Hazard Assessment Frequency (Planned):

These intervals are planning targets, not statutory requirements, and may be adjusted based on program progress, resource availability, and DDW guidance.

- Non-residential connections: planned re-assessment at least every 3 years after the initial assessment (or sooner for high hazards).
- Residential connections: planned cycle to assess all premises at least once every 6 years, with annual high-hazard follow-up where indicated.

Triggers for additional assessments:

- New or reconnected service
- Change of account holder (residential or non-residential)
- Issuance of a new building permit by the County of Marin
- District is aware of significant activity or material changes (e.g., installation of irrigation systems, plumbing modifications, or addition of auxiliary water sources)
- Occurrence of a backflow event
- Request by the State Water Board
- Request or action by the County of Marin Department of Environmental Health Services (EHS)
- When a prior assessment has lapsed or is considered outdated (generally every 3-6 years –see above—or following substantial property changes)

Compliance Timeframes and Triggers for Noncompliance:

- Standard Compliance Timeframe:
 - Customers must acknowledge the need for corrective action within 30 days of receiving notification of a qualifying risk.
 - Customers must implement the recommended backflow prevention device and isolation measures within 60 days of acknowledgment.
 - The 60-day compliance period begins only after the customer has been notified of a qualifying risk and has acknowledged the need for corrective action.
- Notification and Acknowledgment Includes:
 - Verification of the identified risk at the premises
 - Communication of findings to the customer
 - Customer acknowledgment that corrective action is required
- Flexibility for Complex Cases:
 - If construction or permitting delays make the 60-day timeframe impractical, BCPUD will:
 - Document the reason for extension and revised deadline in the program tracking system.

- Establish a revised compliance deadline
- Document the new date in the program tracking system
- Monitor progress to ensure timely follow-up and enforcement

Backflow Prevention Assembly (BPA) Inventory & Testing

Existing Inventory

- BCPUD currently maintains an inventory of 27 known BPAs within our service area.
- These customers are notified annually to complete BPA testing.
- Inspection records are kept in paper format, completed by a Certified Backflow Specialist. Each record typically includes:
 1. Account Number
 2. Service Address
 3. Manufacturer
 4. Model
 5. Size
 6. Serial Number
 7. Inspection Status: *Passed, Failed, Needs Repair, or Needs Replacement*
 8. Device Type: *RP, DC, PVB, SVB, DCDA, or RPDA*
 9. Test Date and Time
 10. Diagnostic Results (e.g., holding PSID)
 11. Tester Name and Certification Number

Current Limitation: These parameters are not stored in a searchable database (e.g., Excel); only paper copies exist.

Planned Inventory Updates

Under the new Cross-Connection Control Program (CCCP), BCPUD will:

- Develop and maintain an Excel database and associated forms capturing at least the parameters listed above.
- Implement the following timeline and prioritization:
 - Commercial, Industrial, Institutional (CII) and known devices:
Target completion by **March 31, 2026**.
 - Residential devices:
Target completion by **December 31, 2026**.

Note: These dates are goals and may be adjusted based on program progress, resource availability, and professional service constraints.

Special Conditions

- **Buried BPAs:**

BCPUD is not aware of any below-grade BPAs in the system. The District does not plan to permit buried BPAs unless specifically approved. If allowed, installations must comply with CCCPH and manufacturer criteria for testability, drainage, and freeze protection.

- **Freezing Conditions:**

Freeze risk is minimal in our service area. Assemblies will be protected per manufacturer standards (elevation, exposure, drainage/insulation).

- **Non-Testable Backflow Preventers at PWS Facilities:**

The General Manager and Chief Operator are not aware of any non-testable devices in the public water system. If discovered or installed in the future, such devices will comply with the California Plumbing Code and be verified on a preventive-maintenance schedule.

Testing Requirements & Procedures:

Annual Testing

- All testable BPAs must be field-tested at least annually; air gaps inspected.
- More frequent testing may be required for repeated failures or high-hazard connections.

Customer Responsibility

- Installation, annual testing, and maintenance/repairs are the customer's responsibility.
- Test results must be submitted to BCPUD within 30 days of the scheduled test date.

District's Procedures for Verifying Certification of BPA Tester

- Beginning **July 1, 2026**, BCPUD will accept tests only from testers certified by State Water Board-recognized organizations.
- By **July 1, 2027**, the certifying bodies must be ANSI-accredited.
- To ensure compliance

1. Certification Verification

- Before accepting any test results, BCPUD staff will:
 - Require testers to submit a copy of their current certification card or digital proof.
 - Verify the certifying organization is recognized by DDW and, after July 1, 2027, ANSI-accredited.
 - Maintain a Tester Registry in the CCC database, including:
 - Tester name, certification number, expiration date, certifying body.
 - Perform annual audits of the registry to ensure all certifications remain valid.

2. Field Test Kit Accuracy

- Testers must provide:
 - Documentation of annual calibration or verification of their test kit by an approved calibration service.
 - Calibration certificate must include:
 - Date of calibration
 - Service provider name
 - Kit serial number
 - BCPUD will:
 - Log calibration dates in the CCC database.
 - Reject test reports from kits without current calibration documentation.

3. Submission of Test Results

- Testers must submit:
 - Completed test report within 30 days of testing.
 - Report must include:
 - All required parameters (device type, serial number, test results, tester info).
 - Acceptable formats: PDF or hard copy.
- BCPUD will:
 - Date-stamp and file all reports.
 - Enter key data into the CCC database for tracking compliance.
 - Send reminders for missing reports after 30 days.

Notification Methods:

- **Initial Reminder (30 Days Before Due Date)**
 - Email the customer, mail a printed reminder letter to the service address or place a phone call to the customer contact number.
 - Reminder includes:
 - BPA testing due date
 - Customer responsibility for scheduling and submitting results
 - Consequences for non-compliance
- **Second Reminder (Due Date Approaching)**
 - Send a **follow-up email** one week before the due date.
 - Optional courtesy call if prior contact was unsuccessful.
- **Delinquency Notice (After Due Date Passes)**
 - Issue a formal delinquency letter by mail and email within 10 days of missed deadline.
 - Letter includes:
 - Notice of non-compliance
 - Deadline for corrective action (e.g., 15 days)
 - Reference to enforcement policy
- **Escalation Steps**

- **Step 1:** Second delinquency notice after 15 days past due.
- **Step 2:** Apply enforcement measures per CCC Plan (e.g., service restriction or shut-off warning).
- **Step 3:** Final notice and potential water service interruption if compliance is not achieved within the specified timeframe.
- **Documentation**
 - Log all notifications (email, mail, phone) in the CCC database.
 - Maintain copies of letters and call notes for compliance records.

BPA Repair/Replacement Timeframes:

- **Immediate Action for High-Hazard Connections**
 - If a BPA serving a **high-hazard facility** fails, is tampered with, or is missing:
 - Customer must **correct the issue immediately** (same day if possible).
 - Temporary measures (e.g., service shut-off or installation of an approved air gap) may be required until compliance is restored.
- **Default Correction Window**
 - For standard hazards:
 - Customer has **30 calendar days** from the date of failure notice to repair or replace the BPA.
 - Written notice will specify:
 - Device location and type
 - Reason for failure (e.g., test failure, missing device, tampering)
 - Deadline for corrective action
- **Shortened Timeframe for Repeat Failures**
 - If a device fails two consecutive annual tests or shows evidence of tampering:
 - Correction window may be reduced to 15 days.
 - District reserves the right to require immediate shut-off for persistent non-compliance.
- **Enforcement After Deadline**
 - If corrective action is not completed within the specified timeframe:
 - **Step 1:** Issue a delinquency notice and final warning.
 - **Step 2:** Apply enforcement measures per CCC Plan (e.g., water service restriction or shut-off).
 - **Step 3:** Document all actions in the CCC database.
- **Documentation**
 - Maintain records of:
 - Date of failure notice
 - Customer communication
 - Repair/replacement verification
 - Enforcement actions (if applicable)

Penalties for failure to test or maintain BPAs:

- **Administrative Notices**
 - Initial notice issued when test results are overdue or device fails.
 - Second notice after missed deadline; shortened correction window.
 - Final notice before shut-off (minimum 72-hour warning).
- **Enforcement**
 - Water service may be restricted or shut off if compliance is not achieved.
 - Immediate shut-off for high-hazard connections posing imminent risk.
- **Administrative Fee**
 - **\$20 per assembly annually** to cover program administration (Board-approved fee schedule).
 - Additional charges may apply for repeated notices, field visits, or reconnection.
- **Billing**
 - Fees will most likely appear separate from the customer's regular BCPUD quarterly water bill; unpaid balances follow standard collection procedures.
- **Appeals**
 - Written appeal allowed within 10 days of delinquency notice.
 - Short extensions may be granted for documented scheduling or hardship.
- **Reinstatement**
 - Requires passing test results or proof of repair/replacement and payment of outstanding charges.
- **Documentation**
 - All notices, deadlines, and enforcement actions logged in CCC database.

Backflow Incident Response, Notification & Reporting

In the event of a suspected or known backflow incident, the General Manager certifies that our PWS system will:

- Respond and investigate immediately: document complaints, collect water-quality samples, check pressure/valving, identify cause and extent
- Notify DDW District Office within 24 hours of discovery
- If directed by the regulatory agency, the PWS will notify customers with appropriate public notification within 24 hours
- Complete a Backflow Incident Report, at the request of the regulatory agency
 - Provide names of responding personnel who responded to the water quality complaint and suspected backflow incident

Regulatory authority contact: Division of Drinking Water—District 25 (Bay Area)



Elliott Nguyen
Water Resource Control Engineer

- DIVISION OF DRINKING WATER
Northern California Drinking Water Field Operations Branch |
North Coast / Marin District
- Email: Elliott.Nguyen@Waterboards.ca.gov
Phone: +1 (707) 576-2422
- State Water Resources Control Boards
50 D Street #200, Santa Rosa CA 95404
- Website: www.waterboards.ca.gov

Public Outreach & Local Entity Coordination

Outreach Methods:

- **Bill Inserts & Newsletters:**
 - Periodic reminders about testing requirements, deadlines, and compliance responsibilities.
- **New Customer Documentation:**
 - Include CCC program overview and BPA requirements in welcome packets.
- **Email Notices:**
 - Targeted reminders for upcoming test deadlines and delinquency notices.
- **Website Resources:**
 - Dedicated CCC program page with FAQs, approved tester list, and downloadable forms.

Local Agency Coordination:

- **Fire Authorities:**
 - Share information on fire service lines and detector assemblies; coordinate on emergency shut offs.
- **County of Marin Building, Permitting & Health Departments:**
 - Align on installation standards and permit requirements for BPAs.
 - Coordinate on cross-connection risks related to septic systems, wells, and reclaimed water.
- **Local Plumbers & Certified Testers:**
 - Maintain updated contact lists; provide plan & program updates

Record Keeping

Storage methods:

Maintain both **digital records** (CCC database on district network drive) and **hard copies** in secure physical files.

Retention Standards:

- BCPUD will meet CCCPH section 3.5.1 program documentation standards and at least the minimum 3-year device records specified in Ordinance 28
- If CCCPH requires longer retention for specific records, BCPUD will follow CCCPH

Records maintained include:

- BPA inventory and annual test reports (see Attachment A) Customer notices and enforcement actions (sample database to be provided)
- Tester certification and training documentation
- Incident response and corrective action records

Documentation Practices:

- Date-stamp all incoming reports and notices
- Log notifications, compliance deadlines, and enforcement actions in the CCC database
- Maintain searchable digital files for inventory and compliance tracking; preserve originals for audit readiness

Recycled Water / User Site Supervisor Requirements

- BCPUD does not currently use recycled water in its service area.
- If future projects add recycled water or dual-plumbed systems, BCPUD will update this plan to include user site-supervisor qualifications and contact tracking.

Certification

I certify that the information submitted in this Cross-Connection Control Plan is accurate and that BCPUD will comply with the Cross-Connection Control Policy Handbook (effective July 1, 2024) and subsequent updates. BCPUD will ensure this Plan remains representative of the current operation of its CCC Program. Attached are the hazard assessment framework, initial BPA inventory, and Ordinance 28 (amended) providing CCC enforcement authority.

Name:	
Role:	

Signature / Date:	
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DDW / LPA Review (for State use)

Name:	
Title:	
Signature / Date:	

Attachments

- Attachment A — BPA Inventory (Summary Table)
- Attachment B — Legal Authority: BCPUD Ordinance 28 (as amended).