

Safe Yield Subgroup: DRAFT NOTES

April 26, 2018

Subgroup Meeting and Subgroup Considerations for the
Waterworks Advisory Committee Meeting scheduled for May 17, 2018

Persons who participated in the subgroup: Hugh Eggborn, Roger Cronin, Tom Fauber, Skip Harper

Regarding the topic of requiring DPOR certified persons for testing and repairing backflow prevention assemblies or devices, the subgroup recommended the following:

"Starting January 1, 2022, persons testing and repairing backflow prevention assemblies or devices shall be certified by a Commonwealth of Virginia tradesman certification program (currently identified under DPOR as backflow prevention device workers) . Until that date, persons testing and repairing backflow prevention assemblies and devices shall be qualified to perform such work as demonstrated by possessing a valid certification or license from a local or state agency having legal jurisdiction. In the absence of any valid local or state requirements for certification or licensure, the person shall possess a certificate of completion of applicable vocational training acceptable to the water purveyor."

Items for consideration:

Annual inspections of testable devices – 12VAC5-590-600 C. -- Is it okay since it is applicable to devices that provide containment, regardless of where located or what type of connection (residential, industrial, commercial, etc.)? If a residential connection needs a testable containment device because of a unique/special situation, then it needs to be tested annually.

What is the cost to small waterworks owners?

Should the regulations not require DPOR certification for testers since there are not sufficient numbers of certified people in some areas of the state? The prime example is far SW Virginia where there are only 30 certified testers based on a review from DPOR's website, sorted by zipcode.

Should the regulations include a time frame for the requirement to become effective, something like 3 years in the future, to give waterworks owners the opportunity to be prepared. Below is my summary of the location of certified testers:

Northern VA (far N) = 160

North Central VA (Fredericksburg, Culpeper, etc) = 94

Central and Northern Shenandoah Valley = 74

Central VA (west - Charlottesville, Waynesboro, etc) = 59

Central VA (main - Richmond, Petersburg, etc) = 377

Tidewater (and expanded area) = 257

Southside (Martinsville, Lynchburg, Farmville, Bedford, etc.) = 149

SW VA (near - Roanoke, Blacksburg, Christiansburg, Salem, etc.) = 108

SW VA (far) = 30

The above list does not add up to the 1,364 on the DPOR list, but it is close, especially after removing out-of-state persons. Some thought the regulations should not require the DPOR certification at this time. While annual inspections of all testable devices are required, should the Waterworks owner only have a program to track the testing for non-residential devices? At least one person wondered whether 12VAC5-590-600 C should be amended to read:

“The owner shall establish procedures for completing operational tests or repairs for all devices that do not fall under 12VAC5-590-600 D.”

Regarding 12VAC5-590-580 through 630, the subgroup recommended the following.