



# ILLINOIS ASSOCIATION of PLUMBING- HEATING - COOLING CONTRACTORS

821 S. GRAND AVE. WEST • SPRINGFIELD, ILLINOIS 62704

(217) 522-7219 • FAX (217) 522-4315 • 1-800-795-7422 • bev@ilphcc.com

September 29, 2017

Katie Papadimitriu, Chairman  
Illinois Pollution Control Board  
1021 N. Grand Ave. East  
PO Box 19274  
Springfield, IL 62794-9274

Re: Board Docket R18-17 (Rulemaking – Water) Proposed New 35 IL Adm. Code 604

To Whom It May Concern,

The Illinois Plumbing, Heating, Cooling Contractors (PHCC) is a trade association representing licensed plumbers and registered plumbing contractors throughout the state of Illinois. We would like to respectfully submit the following comments to the proposed additions/changes to 35 Ill. Adm. Code 604, specifically SUBPART O: CROSS CONNECTIONS (Section 604.1500 thru 604.1515).

1. In 604.1500 thru 604.1515, the term “backflow prevention device (s)” is used throughout the proposed section. We would like to propose that “backflow prevention device (s)” be changed to “backflow preventer” to be consistent with Illinois Plumbing Code Section 890.120 definition.
2. We would like to recommend that throughout Section 604.1510 “Cross Connection Control Device Inspectors (CCCDI)” be changed to “Certified Cross Connection Control Device Tester”. This would make the title of those doing this work in Illinois consistent with what is being used across

the country in the backflow industry. Groups such as the following use the word tester as opposed to inspector: American Backflow Prevention Association (ABPA), American Society of Sanitary Engineers (ASSE), American Water Works Association (AWWA), Backflow Prevention Manufacturers Association (BPMA), University of Southern California's Foundation for Cross Connection Control and Hydraulic Research (USC-FCCCHR), International Association of Plumbing & Mechanical Officials (IAPMO), and the International Code Council (ICC). In addition, we would request that the word "inspect" be replaced with the word "test" where it appears throughout Subpart O. Backflow devices are being tested to ensure their proper workability. This is not an inspection, but an actual physical test.

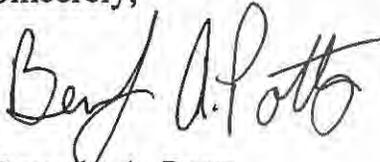
3. 604.1500 a), states "No cross connection shall be allowed between water plant piping and any drain or sewer". We propose an addition to the language to state, "No cross connection shall be allowed between water plant piping and any non-potable source, drain, or sewer."
4. Section 604.1510 a)1) requires that records of the annual testing must be submitted to the community water supply. We feel it would be of benefit to add that those reports be submitted within 10 business days of the test. Timely reporting is important for the CWS to be informed of what is being properly protected and what potential hazards may exist.
5. We would like to see the following items added to requirements under Section 604.1510 a)3):
  1. name and registration number of the registered plumbing contractor employing the person conducting the test. In order to be a registered plumbing contractor with IDPH, contractors must show proof of proper insurance and bonding. This is an additional consumer protection.
  2. a definitive statement of Pass or Fail in addition to the actual test results.
  3. type of test kit being used and the most recent date of calibration.
  4. what the device is serving/protecting.
  5. is the device used for isolation or containment.

6. location of the device on the premises.
  7. make, model, and serial number of the backflow preventer.
6. Creating a Section 604.1510 4) to require that all devices that fail upon testing be repaired within 30 days of the detected failure or water service to the customer will be terminated, will ensure that the potential hazard is mitigated as soon as possible.
7. Section 604.1510 b) spells out the requirements to be a backflow tester. We recommend the following changes/additions to those requirements.
- 604.1510 1)a) change to read “Must meet the qualifications of a person authorized to perform plumbing as defined in the Illinois Plumbing License Law, 225 ILCS 320/3(1). The language currently states that the person must meet the qualifications to inspect plumbing and is not accurate for this application.
- 604.1510 b)1)B) mandates that all training to become a CCCDI must be completed by the Environmental Resource Training Center (ERTC). While we highly respect ERTC and the work that they do, we are concerned that at some point in the future they may lack funding and/or staff to supply the necessary training. With that being said, we suggest language be added to provide for other training providers in the event that ERTC would no longer be able to provide services. That provider (s) would need to be approved by IDPH with the advice and consent of the Illinois Plumbing Code Advisory Council, and the Board of Plumbing Examiners.
- 604.1510(b)(1)(D) states that you “Must successfully complete both written and performance examinations demonstrating understanding of the following: the principles of backflow and back-siphonage; the hazard presented to a potable water system; locations which require installation of cross-connection control devices; identifying, locating, inspecting, testing, maintaining and repairing cross-connection control methods and devices in-line, as located throughout each system which connects to a community public water supply.” We would like to see “understanding” replaced with “competency”, and “inspecting” removed.

Once a person successfully completes training to become a CCCDI, there is no requirement for further education or recertification. As methods and technologies change, the CCCDI must keep current in order to complete their work efficiently and to properly protect the water supply. Some CCCDIs do not test on a regular basis, nor do they keep current on industry changes. Cross connection programs throughout the nation require recertification at least every three years. Without a mandate for recertification, testers may very well be passing backflow preventers that should actually be failed, and thereby jeopardizing the safety of our water supplies. A section 604.1510(b)(1)(E) could be added to require all CCCDIs to recertify every three years. This could be a one day training that would demonstrate that the CCCDI still maintains the competency, both physically and knowledge wise, to perform backflow tests. We would recommend that the recertification be done by ERTC or an entity approved by IDPH with the advice and consent of the Plumbing Code Advisory Council and the Board of Plumbing Examiners.

The Illinois PHCC respectfully requests your consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Beverly A. Potts". The signature is written in a cursive, flowing style.

Beverly A. Potts  
Executive Director