

Frequently Asked Questions Cross-Connection Control Annual Summary Report Forms

Reference Guide

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Section A – Purpose and Abbreviations and Acronyms

This document provides Department of Health (DOH) answers to questions from purveyors about how to properly complete Cross-Connection Control (CCC) Annual Summary Report forms. We've answered general questions first, and then we answer form-specific questions.

Abbreviations and Acronyms

AG	Air Gap	DOH	WA State Department of Health
AHJ	Authority Having Jurisdiction	PWS	Public Water System
AVB	Atmospheric Vacuum Breaker	RPBA	Reduced Pressure Backflow Assembly
BAT	Backflow Assembly Tester	RPDA	Reduced Pressure Detector Assembly
CCC	Cross-Connection Control	SHHF	Severe Health Hazard Facility
CCS	Cross-Connection Specialist	SVBA	Spill Resistant Vacuum Breaker Assembly
DCDA	Double Check Detector Assembly	UPC	Uniform Plumbing Code
DCVA	Double Check Valve Assembly	WFI	Water Facilities Inventory

Section B - General

Q B-1: If I properly complete and submit my system's CCC reports to DOH via the Internet, do I still need to mail DOH signed hard copies of the completed forms?

A: *No. Public Water Systems (PWSs) must use the web-based process to complete and submit **all** their required ASR forms for the reporting year. You **don't** need to mail hard copies to DOH.*

Q B-2: If I properly complete and submit all required CCC reports to DOH via the Internet, will my PWS comply with the reporting requirements of WAC 246-290-490(8)(d)?

A: *Yes.*

Q B-3: This reporting year, we had a written CCC Program Plan but no implementation activities. We plan to start implementing our CCC program soon. What should we report?

A: *DOH is currently requesting information for the previous calendar year. Since you have a written Program Plan, complete the cream form. Fill out the blue form as much as possible. On the blue form Part 2 (page 1), be sure to check the “no” box on implementation activities, and on Part 3 (page 2), estimate the numbers and types of high-hazard premises your system serves. Report information on your system’s implementation activities on next year’s forms.*

Q B-4: We had no written CCC Program Plan and no implementation activities for the current reporting year. Do we still have to fill out ASR forms?

A: *Yes, at a minimum, you must submit a blue form and a cream form. Fill out the blue form as much as possible. On Part 2 (page 1) of the blue form, check the “no” box on written program and the “no” box on implementation activities. Fill out the cream form as much as possible to reflect whatever CCC policies or procedures you have developed or currently follow. Contact DOH as soon as possible for help in developing and implementing a CCC Program.*

Q B-5: Do I have to complete an Exception Form, if I didn’t grant any exceptions in the current reporting year?

A: *Generally, no, don’t Save or Submit any Exception forms for this reporting year. However, if you granted an exception in a previous year, but didn’t submit a completed Exception form to DOH that reporting year, you must complete an Exception form for the previously granted exception. See Q J-3 for more information on this subject.*

Q B-6: Do I have to complete every field on each of the CCC forms?

A: *Generally, yes. Try to fill out the forms as completely and accurately as possible, so that DOH can assess your system’s CCC program status. This is especially critical, because DOH uses ASR data as the basis for CCC compliance action. DOH may contact you if information on the submitted forms is missing, is illogical or inconsistent, or needs further explanation.*

Section C – Website Access Questions

Q C-1: Why can’t I access the website? I get a message saying the page is not available.

A: *The website may be temporarily unavailable when the programmer is modifying it. If you can’t access the website, wait 15 to 30 minutes and try again. Re-typing the website address, <http://www4.doh.wa.gov/dw/ccc>, in your browser’s address box may solve the problem. If you still have trouble, contact your network administrator or information technology (IT) staff. If you still have problems, contact DOH CCC Program staff at (360) 236-3133 for help.*

Q C-2: When do I Save and when do I Submit the form I’m working on?

A: *Use Save for work in progress (saves data you’ve already entered). Use Submit when you are finished entering data for your entire ASR form. We consider submitted forms as final “official” water system documents. We use final ASR forms as the basis for CCC compliance. You can Save or Submit the entire form from any page.*

We recommend that you **Save**:

- At least once per page.
- When you've entered a large amount of data in one session.
- Before your session times out (30 minutes between Saves or page changes).
- When you must leave the computer.
- When you're interrupted by a phone call, a visitor, and so on.

Note: even if you've **Submitted** final forms, you can edit or add data later. Use the **Edit** link on the **Edit/Print** screen. Add a comment that you've changed your final forms, identify the data fields you've changed, and explain the reason for the change. If you edit submitted forms after the deadline, let DOH CCC staff know that you've updated a previously submitted form(s).

Section D - Contact Information Screen

Q D-1: We have several certified CCSs that work for our system. Can you clarify whose name should appear on the Contact Information Screen?

A: We define CCC Program Manager and PWS Manager as follows:

- **CCC Program Manager** is the certified Cross-Connection Specialist (CCS) who is in responsible charge of the CCC program, as required in WAC 246-290-490(3)(e). For large systems, this is the person who manages the CCC Program for the PWS, i.e., the person responsible for the development and day-to-day implementation of the CCC program.
- **PWS Manager** is the person who the CCC Program Manager reports to or other manager having direct responsibility for and/or oversight of the CCC program (doesn't need to be in charge of the entire PWS). In some systems, the same person fills both the PWS and the CCC Program Manager roles.

Section E - Data Logic/Type Pop-up Messages and Required Field Messages

Q E-1: Sometimes I get a gray box that pops up when I leave a field on one of the web-based forms. What is this and what should I do?

A: This is a **Data Logic** or **Data Type** message.

- **Data Logic Messages** appear on the blue or green forms when illogical numbers or dates (when compared to numbers or dates entered in other fields) are entered on the forms.
- **Data Type Messages** appear if text or characters such as commas, dashes, and so on, are entered into data fields that expect only numbers. "Number fields" are those fields that contain zeros (0) when you first access a form.

If you get a **Data Logic** or **Data Type Message**, click "OK" to get rid of the pop-up box. Try to correct the data entered, either in the field in question or in the comparison field.

If you can't correct the data when the **Data Logic** or **Data Type Message** first appears, fill out the rest of the form and Save (as a draft). However, before you Submit your final forms to DOH, please be sure to correct the values using the **Edit** feature.

Note: As long as the illogical data or the incorrect type of data remains in the field, the **Data Logic** or **Data Type Message** will appear when you leave the field. On a correctly completed form, no **Data Logic** or **Data Type Messages** will appear for any of the fields.

Please do not ignore these messages! We've included these to improve data consistency and quality. Also, since we use the data for compliance, incorrect data may lead to unnecessary CCC compliance actions against your system.

Section H - CCC Activities Annual Summary Report (blue form)

Blue Form General

Q H-1: Do I have to complete every field on the blue form?

A: *Generally, yes, with the following exceptions:*

- **Part 3B, page 2.** *If the PWS doesn't serve **any** high-hazard premises, check the box at the top of the table and go to Part 3C. All the data fields in the table will default to zeros (0).*
- **Part 3C, page 3.** *If PWS doesn't serve any high-hazard medical category premises, check the box at the top of the table and go to Part 4. All the data fields in the table will default to zeros (0).*
- **Part 4A, page 4.** *If your PWS can't distinguish between premises isolation backflow preventers and in-premises preventers, check the box and enter all data in the top half of the table. All the fields in the bottom half of the table will default to zeros (0).*
- **Part 5, page 5.** *For any row, if data is not available, check the No Data Available box. Leave the "Number" field at its default value of zero (0).*

Blue Form Part 2: Status of CCC Program

Q H-3: We have a written CCC Program Plan that doesn't address all of the minimum elements in WAC 246-290-490 and hasn't been approved by DOH. We also just started doing hazard evaluations (began implementing our CCC program) in the reporting year. How should we report this?

A: *Provide your answers using the following guidance:*

- **Written Program:** *Check "Yes", if PWS has **any** type of written CCC program, policies or procedures, even if the written program doesn't meet the WAC or is not DOH-approved.*
- **Implementation Activities:** *Check "Yes", if PWS had **any** CCC implementation activities during the current reporting year, such as hazard evaluations, backflow assemblies installed to protect the PWS, assembly testing, assembly inventory records, or CCC enforcement.*

Blue Form Part 3: System Characteristics

Q H-4: How do I count connections for purposes of Part 3A? Do I use actual connections (as counted by the water system), "DOH calculated," or "DOH approved" as per the Water Facilities Inventory (WFI) form?

A: *For purposes of Part 3A, use the actual number of service connections **as counted by the water system**. This may **differ** from the WFI information, because of counting methods.*

For example, for WFI purposes, DOH counts the living units in a multifamily building as separate connections, but the water purveyor may count a multi-family building as a single connection because the building has a single meter.

We use these residential and non-residential connection numbers to assess the reasonableness of the numbers reported in the high-hazard categories (Parts 3B and 3C) and backflow preventer inventory (Part 4A). For CCC purposes, the count of actual connections to the water distribution system is more useful than the count used for the WFI, since these represent conduits for contaminants to enter the public water system's distribution system.

DOH also recognizes that water systems may categorize types of connections differently. For example, some water systems may consider a large multifamily building as a “commercial” connection rather than a “residential” connection. If your data warrants an explanation, enter additional information in the comment section.

Note: DOH uses WFI connection information to identify which systems must submit ASR forms.

Q H-5: On the high-hazard and Medical Category premises tables (Parts 3B and 3C), should I include high-hazard premises that currently have only *in-premises* prevention?

A: Count connections to these premises only in the Number Served (**column A**). **Don’t include them in the With Premises Isolation by AG or RP (column B) or in the Premises Isolation AG Inspected or RP Tested (column C)**, even if all the *in-premises* preventers have been inspected and tested. **Note: High-hazard premises with *in-premises* backflow prevention only do not comply with the requirements for mandatory premises isolation by AG or RP in the drinking water rules. Water systems reporting these may be subject to DOH enforcement.**

Q H-6: On Parts 3B and 3C, should I include high-hazard premises that currently have double check valve (DCVA) assemblies installed for premises isolation?

A: Follow the “counting” directions in QH-5 above. **High-hazard premises isolated with DCVAs do not comply with the requirements for mandatory premises isolation by AG or RP in the drinking water rules. Water systems reporting these may be subject to DOH enforcement.**

Q H-7: On the high-hazard premises table, should I include “other” premises that we consider Table-9 type premises requiring premises isolation?

A: Table 9 of WAC 246-290-490 is **not** all-inclusive. Use the “Other” rows near the bottom of the table on page 2 (or 3) of the blue form to identify other types of premises that the PWS considers to be Table-9 type **high-hazard premises**. On page 2, include facilities with hazardous materials, activities, or processes on the premises, such as aircraft and automotive manufacturers, pulp and paper mills, metal manufacturers, military bases, fairgrounds, and wholesale customers that pose a high hazard to the public water system. You may group these into categories, such as “other manufacturing” or “other commercial” if you want to.

Don’t enter low hazard premises (such as tall buildings) where the water system requires a DCVA for premises isolation. In Part 2J of the cream form, indicate whether the PWS requires non-residential, low-hazard premises to install premises isolation preventers.

Q H-8: On the high-hazard premises table, what shall I enter on the row pertaining to wastewater lift stations and pumping stations (non-residential only)?

A: Count only **non-residential connections** with wastewater pump stations where your system’s potable water supply is available for maintenance of the pump station. This would include pump stations such as those belonging to the wastewater collection agency (usually the municipal sewage system) and those located on commercial and industrial premises.

Count connections only to those non-residential wastewater lift or pump stations where your system’s water is supplied in **any** of the following ways:

- Hard plumbed to the pump station itself.
- Not hard-plumbed to the pump station, but instead is located on the same property as the pump station such as through a yard hydrant or a hose bib.
- Not hard plumbed to the pump station, but instead is readily available in the vicinity of the pump station, such that it would be reasonable to assume that the potable water could be used for maintenance of the pump station. The water purveyor’s Cross-Connection Control Specialist is responsible for making this determination of use.

Q H-9: On the high-hazard premises table, should I include premises, such as large grocery stores with meat departments, as food processing plants?

A: *DOH doesn't generally include grocery stores with meat departments in the food processing plants category. However, if the PWS requires premises isolation by AG/RP for such premises, these grocery store connections can be reported in the "Other" rows at the bottom of the table.*

Q H 10: How can I find out the type and number of Medical Category premises my system serves?

A: *Use the "Medical Category Table Resource Information" table on the ASR website's Downloads page. The table lists Internet sites and other information sources to help you determine whether any of the medical-type premises listed on Part 3C are located in your service area.*

Q H 11: How should I count a service connection that serves more than one type of medical category? For example, how should I count a building that has a same-day surgery center and also a psychiatric clinic?

A: *If you serve different medical category premises through a common service connection, count the connection under the medical category you consider to pose the highest hazard to the water system. In this example, count this connection in the same-day surgery category. **Do not count the service connection more than once on the Medical Category Table.***

Q H 12: Will my water system be subject to compliance action if I show too many medical category premises not isolated by an RP or AG?

A: *Possibly. Past ASR data shows that medical facilities in Washington:*

- *Make up the largest category of high-health hazard premises.*
- *Account for a large percentage of unprotected high-hazard premises.*

DOH may use the previous year's ASR data to establish priorities for the next round of CCC compliance. DOH expects to phase the medical category compliance efforts over several years.

*Depending upon the number of unprotected premises and available resources, DOH may focus CCC compliance each year on a selected category (or categories) of medical facilities. **At a minimum, we expect water systems to make a good faith effort towards achieving complete compliance with the medical category or categories selected for emphasis in a given year.***

Blue Form Part 4A: Backflow Preventer Inventory and Testing During Reporting Year

Q H-13: Can you clarify what the terms "premises isolation" and "in-premises protection" mean?

A: *These backflow industry terms are defined as follows:*

- **Premises isolation** means a backflow prevention strategy in which an approved backflow preventer (RP or AG) is installed at or near the service connection (or an alternate location acceptable to the purveyor) to isolate the consumer's entire plumbing system (within the property lines of the consumer's premises) from the PWS. Premises isolation preventers directly protect the PWS's distribution system from contamination and are required for high-hazard premises of the type on Table 9.
- **In-premises protection** means a backflow prevention strategy in which an approved backflow preventer is installed either at the point of hazard such as a plumbing fixture (fixture protection) or at a location to isolate an area such as a laboratory wing within the consumer's premises (area isolation). In-premises preventers protect the consumer's water system from contamination and in most cases are required by the Uniform Plumbing Code as amended for Washington. PWSs may rely solely on in-premises preventers to protect the public water system from contamination for non-Table 9 type premises only.

Q H-14: We don't track atmospheric vacuum breakers (AVBs). How do we report this?

A: *If you don't track AVBs, check the box above the AVB column. "Unk" will automatically be entered in every AVB field on the table. To avoid an Error Message, **don't** enter "unk" or any other text in any of the non-AVB fields in this table. Instead, estimate a value or enter zero (0).*

Q H-15: Many of the rows in the Inventory and Testing table seem to ask for the same data. Can you clarify what the different rows mean?

A: *The table reflects DOH's interest in inventory/testing data for two different categories of backflow preventers. These are: 1) **Premises isolation** preventers; and 2) **In-premises** preventers (installed for fixture protection or area isolation).*

*Some rows do ask for the same **type** of data. However, **Rows 1-7** apply only to the **premises isolation** preventers; and **Rows 8-14** apply only to **in-premises preventers**.*

*In addition to the two preventer categories described above, DOH is also interested in inventory and testing data on **existing** versus **new** backflow preventers. In this table, DOH is specifically interested in: 1) Backflow preventers that were placed into service **before** the current reporting year; and 2) Backflow preventers that were placed into service **during** the current reporting year.*

Q-H-16: What is a failure? Why is it important that all failures be counted and reported to DOH?

A: *Any time a backflow preventer fails to pass a field test or inspection by a DOH-certified backflow assembly tester (BAT), count it as a "failure." Report failures in the appropriate rows on the inventory table.*

*Count multiple failures of the same preventer as one failure. **It doesn't matter whether the backflow preventer passes the test after repairs or cleaning.***

*It's very important to count **all** backflow preventers that fail at least one test or inspection during the reporting year. DOH frequently receives requests or proposals to relax the annual testing requirement because of the apparent lack of failures. **DOH must have accurate failure rates to justify maintaining the annual testing requirement.***

Q H-17: We require some assemblies to be tested twice per calendar year. How should I report these tests and failures (if any) on the Inventory/Testing table?

A: *Count the multiple tests as one test, since DOH is interested in knowing whether an assembly was tested **at least once** during the calendar year. Similarly, if an assembly failed one or more tests in the reporting year, count the multiple failures as one failure.*

Q H-18: How should we report detector assembly inventory and testing information?

A: *Count each detector assembly only **once**, in the RPDA or DCDA column as appropriate. Don't count the bypass separately. If an entire detector assembly is taken out of service, count the removal once, in the RBDA or DCDA column (line 7 or 14). Don't count bypass assembly replacement as a detector taken out of service.*

*Count as **one** test, in the RPDA or DCDA column, the test of the mainline assembly and bypass assembly. Count as **one** failure, in the RPDA or DCDA column, the failure of either the mainline or bypass assembly or both the mainline and bypass assemblies.*

Q H-19: Can you give an example to show how to complete the Inventory/Testing table?

A: *Yes. See the example on the next page.*

Assume that:

1. A water system has **50** premises isolation DCVAs in service at the beginning of the reporting year.
2. Of these **50** existing premises isolation DCVAs, **45** were tested during the reporting year.
3. Of the **45** assemblies tested, **4** failed.

During the reporting year:

1. **5 new** premises isolation DCVAs were installed (i.e. placed into service) at locations not previously protected.
2. **3 new** premises isolation DCVAs were installed to replace existing DCVAs that were beyond repair.
3. All **8** of the **new** DCVAs were tested upon installation and **1** failed.
4. **2 existing** premises isolation DCVAs were replaced by RPBA's.
5. **1 existing** premises isolation DCVA was removed from service (building was demolished).

See the example Part 4A table below. The entries under the DCVA column for rows 1-7 and the total will be as follows:

Row #	Backflow Preventer Category and Testing/Inspection Information	DCVA
Rows 1-3 pertain only to premises isolation preventers in service at the beginning of reporting year		
1	In service at beginning of reporting year	50
2	Inspected and/or tested in reporting year	45
3	Failed inspection or test in reporting year	4
Rows 4-6 pertain only to NEW premises isolation preventers installed during reporting year		
4	New preventers installed in reporting year	8
5	Inspected and/or tested in reporting year	8
6	Failed inspection or test in reporting year	1
7	Preventers taken out of service in reporting year*	6*
Premises Isolation Total at end of reporting year**		52**

*Preventers taken out of service include those that were replaced, whether or not the replacement preventers were the same or different type. In this example, DCVAs taken out of service includes 3 replaced by new DCVAs, 2 replaced by RPBA's, and 1 removed and not replaced.

The Total will be calculated as follows: **50 existing DCVAs **plus 8 new** DCVAs installed during the reporting year, **minus 6** taken out of service. In this example, count the 2 RPBA's (replacing the DCVAs) in "Number of preventers installed in the reporting year" in the RPBA column.

Q-H-20: Our system tracks both premises isolation and in-premises/fixture protection backflow preventers. Which ones do we report on the Inventory/Testing table in Part 4A?

A: Report preventers that provide the **primary** means of backflow protection for the public water system. In other words, count the preventers that directly protect the public water system.

In Part 4A, you must count the following backflow preventers:

- Premises isolation backflow preventers.
- Fixture protection (or area isolation) backflow preventers that the purveyor directly relies on to protect the public water system. These must be reported **when no premises isolation backflow preventer is installed.**

To illustrate, consider the following Part 4A examples:

Example 1: Facility with premises isolation.

- A premises isolation RPBA (or DCVA) is installed on the service line to the facility.
- All fixtures within the facility's plumbing system have the proper backflow preventers.
- **Count and report only the premises isolation backflow preventer.**

Example 2: Facility with dedicated line supplying an irrigation system without chemical injection.

- A premises isolation DCVA is installed on the dedicated irrigation line.
- **In Part 4A, count and report the DCVA as a premises isolation DCVA.**

Example 3: Non high-hazard facility with fixture protection only (no premises isolation preventer).

- A small convenience store is not a high hazard facility and does not require a premises isolation backflow preventer.
- A carbonated beverage machine is installed in the store.
- As required by the UPC amended for Washington, an RPBA is installed on the water supply line to the carbonated beverage machine.
- The purveyor relies on the fixture protection RPBA for protection of the water system.
- **In Part 4A, count and report the RPBA in the fixture protection section of the table.**

To ensure proper reporting, track the following information for each backflow preventer:

- *Function: whether the backflow preventer is installed for premises isolation or fixture protection or area isolation.*
- *Whether the backflow preventer directly protects the water system; for example, whether it needs to be included in the counts on the table in Part 4A.*

Blue Form Part 5: Backflow Incidents, Risk Factors and Indicators

Q H-21: Do we include water leaks (at joints) as “main breaks”?

A: *Main breaks should not include leaks at joints or corp stops. However, if your system doesn't distinguish between the two, estimate the number of main breaks in Part 5, and make a notation in the Part 6 comments section of the blue form.*

Q H-22: Do we include planned or scheduled water outages as “water outage events”?

A: *Planned or scheduled water outages should be included as water outage events, because they may result in backflow from unprotected premises.*

Section I - Cross-Connection Control Program Summary (cream form)

Q I-1: Do I have to complete every field on the cream form?

A: *Yes, except in Part 2E: Backflow Protection for Fire Protection Systems. If your system doesn't require retrofitting of fire sprinkler systems, you do not need to complete the “No. of days allowed” field. Leave the default zero (0) in this field.*

Q I-2: Does the web-based cream form have data logic checks like the blue form?

A: *The web-based cream form currently includes very few data logic checks on. Make sure that you provide complete and logical answers. In most fields, you should check only one box or circle.*

Q I-3: We're revising our written CCC Program Plan. What should we report on the cream ASR?

A: *Report on the status of your written CCC program plan as of December 31st of the reporting year. Note in Part 4, Comments, that you're revising the plan. Next year, provide updated information on the revised plan on your cream form.*

Q I-4: In Part 2A, why doesn't the list include a category where the PWS solely relies on an In-Premises Protection (fixture) type of a CCC Program?

A: *Implementation of a CCC Program that relies on In-Premises Protection (fixture) as the only method of backflow prevention does not comply with the state CCC regulations [WAC 246-290-490(2)(f),(g) and (h)].*

The water system must be protected from severe and high-hazard premises, such as those on Table 9 {WAC 246-290-490(4)(b)}, by a premises isolation backflow preventer.

*Your system may not currently serve any high-hazard premises requiring mandatory premises isolation. However, when a high-hazard premises of the type on Table 9 applies to receive service, the PWS must require a premises isolation AG or RP to be installed **before** providing water service.*

Cream Form Part 2B: Coordination with Authority Having Jurisdiction (AHJ).

Q I-5: Who is the “Authority Having Jurisdiction”?

A: *“AHJ” means the local official, department, or agency responsible for enforcing the Uniform Plumbing Code (UPC) in the PWS’s service area. AHJ replaces the term “Local Administrative Authority” (LAA) used previously in the UPC. Typically, the City or County Building Official acts as the AHJ. However, for unincorporated areas and certain cities in King County, Seattle-King County Health Department assumes this role. Do **not** list DOH, fire districts, other local health jurisdictions, and other state agencies as AHJs, since they do not enforce the UPC.*

Cream Form Part 2D: Typical Program Responsibilities

Q I-6: What do you mean by “Responsible Party”?

A: *This generally means the entity that arranges and directly pays for the CCC Program Activity.*

Cream Form Part 2E: Backflow Protection for Fire Protection Systems

Q I-7: For retrofits to high and/or low-hazard fire protection systems, we allow a range of number of days for compliance. What do we enter in the field provided?

A: *Enter the larger number of days, since this field allows only one value to be entered. Entering a range of days will trigger an Error Message.*

Cream Form Part 2J: Backflow Protection for Non-Residential Connections

Q I-8: What types of non-residential customers fall into the various categories?

A: Examples of non-residential customers in the various categories include:

- **Commercial:** Stores, shopping centers, service stations, restaurants, office buildings.
- **Industrial:** Manufacturing plants for aircraft, automotive, wood products, electronic.
- **Institutional:** Schools, college campuses, and government buildings.

Cream Form Part 2L: Policies Regarding Exceptions

Q I-9: How do I fill out Part 2L about my system’s policies/practices about Exceptions to mandatory premises isolation?

A: *The following describes the items in this Part:*

- **Line 1:** *If your written CCC Program Plan specifically allows or prohibits Exceptions, check “Y” or “N” respectively. If your Program Plan is silent on the issue of Exceptions, or if you don’t have a written Program Plan, check “Doesn’t Address.”*
- **Line 2:** *If you currently grant (or would consider granting) new Exceptions, check “Y” in this line, regardless of your answer in Line 1.*
- **Line 3:** *If you have granted Exceptions in past reporting years, check “Y,” regardless of your answers in either Line 1 or Line 2.*

Note: If you check “N” in Line 2, you will be blocked from starting any new Exception (green) forms. See Q J-4 for more information.

Cream Form Part 3: CCC Program Record-Keeping and Inventory

Q I-10: I used Access (or other software such as Paradox, dBase, or Filemaker) to develop my CCC software. Is that considered “custom-developed” CCC software?

A: *If the CCC software took considerable time and effort to develop, typically requiring the expertise of database programmers and is characterized by many automated operations, check “**Custom Developed**”. If the software used is essentially “as is” or with minimal customization, check “**Other non-CCC software**”. Also, if commercially available CCC software (such as BPMS) has been customized for your PWS, check the box for the commercial software (i.e. BPMS) and **not** “**Custom-Developed**”.*

Section J - Exceptions to High-Hazard Premises Isolation (green form)

Q J-1: Can you please clarify what an Exception is?

A. *An Exception is a purveyor-granted **waiver from mandatory premises isolation** (with an RPBA or AG). Purveyors may grant exceptions, on a case-by-case basis, to premises that would normally require mandatory premises isolation with an AG or RPBA per Table 9 of WAC 246-290-490. Exceptions may be granted to a particular high-hazard premises, only if the purveyor’s CCS determines that **no hazard exists**. The CCC rules [WAC 246-290-490(4)(b)(iii)] give purveyors the option to grant exceptions; however, the rules do not require purveyors to grant exceptions. See the DOH CCC Guidance Manual for Small Water Systems for more information.*

Q J-2: Do I have to complete every field on the Exception (green) form?

A: *Generally, yes. You should pay particular attention to the following items:*

- **Part 2.** *Please complete the “Additional information or description of premises” field to help document the PWS’s reason for granting the exception.*
- **Part 3.** *Please establish an **Exception Expiration Date** and **Date of Next Hazard Evaluation** to help ensure that the system’s CCS periodically reviews and confirms the validity of the Exception. DOH suggests that purveyors re-evaluate Exceptions every 1 – 3 years, depending on the likelihood of a change in use of the premises or plumbing.*

Q J-3: Should I submit an Exception (green) form showing that I didn’t grant any exceptions?

A: *No. Submitting a blank green form (or one that says that you didn’t grant any exceptions) makes data analysis harder for DOH, because we have to eliminate these forms from the CCC database.*

*If you started a green form inadvertently, **exit the form without Saving**. Click on the “Return to Edit/View/Print” button at the bottom of the page and choose “Cancel” in the pop-up box. Q J-5 (below) explains how to **Cancel** an Exception form saved or submitted for this reporting year.*

Q J-4: I want to fill out a new Exception (green) form, but the website won’t let me. What must I do to access and start a new green form?

A: *We base your ability to start a new green form on your answers to Part 2L on the Program Summary (cream) form. To have access to new green forms, make sure you check “Y” in Line 2 of Part 2L on the cream form. See Q-I-9 form more information on Part 2L of the cream form.*

Access to new green forms will be blocked if you:

- *Haven’t started a new cream form;*

- Haven't completed Part 2L in a saved cream form; or
- Checked "N" in Line 2 in Part 2L.

Q J-5: I want to *Cancel* an Exception I previously saved or submitted to DOH, because it is no longer valid or needed. Can I cancel this Exception? If so, how?

A: *Yes. Go to the **Edit/Print** screen. Under the List of Exceptions Granted, find the Premises Name for the Exception you want to cancel. Click on "**Cancel**". On the **Cancellation Reason Screen**, provide a reason for cancelling the Exception and the effective date of cancellation. Cancelling the Exception will remove the premises name from the Exceptions list in later reporting years. Cancelled Exceptions will appear on the Edit/Print Screen only in the reporting year in which they are cancelled.*

Q J-6: I wish to *Renew* an Exception I've previously saved/submitted that has expired. Can I renew this Exception without having to complete a new Exception form?

A: *Yes. Go to the **Edit/Print** screen. Under the List of Exceptions Granted, find the Premises Name for the Exception you want to renew. Click on "**Renew**." You **must** enter a new expiration date and date of the next hazard evaluation. Review and revise (if needed) other data on the form.*

Q J-7: I granted Exceptions in the reporting year to certain premises in response to DOH compliance directives (based on ASR information submitted before the current reporting year). I sent DOH *manually completed* Exception forms with my compliance documents. Do I need to submit Exception forms for these same premises using the current year's ASR web-based application?

A: *Yes. Please enter the Exceptions into the current year's ASR web-based application. Use the data from the original Exception form submitted to DOH with your compliance documents.*

Q J-8: Our system serves a "mortuary" that provides funeral services only (no embalming or processing of bodies). During the hazard survey, we found no hazardous processes or water uses. Is it appropriate to grant an Exception to this mortuary?

A: *If after the hazard evaluation, your CCS determines that no hazard exists, you may grant an Exception to this facility. Complete an Exception form explaining the reason for granting the Exception. Part 4 of the green form lists typical reasons including one for mortuaries with funeral services only. You must conduct periodic re-surveys to ensure that the facility still qualifies for the Exception.*

Q J-9 Our system serves a business that provides both digital film printing services and regular film processing services. We assumed that this facility should be classified as a Table 9 category. However, during the hazard survey, we found that the digital film printing operation has no water-connected equipment. We also found that regular film processing operation is self-contained - has no water-connected equipment and uses only pre-packaged and pre-mixed chemicals (no chemical mixing on site). Is it appropriate to grant an Exception to this business?

A: *If after the hazard evaluation, your CCS determines that no hazard exists, you may grant an Exception to this facility. Complete an Exception form explaining the reason for granting the Exception. Part 4 of the green form lists typical reasons including one for film printing/film processing facilities with no water-connected equipment. You must conduct periodic re-evaluations to ensure that the facility still qualifies for the Exception.*

Section K – Severe Health Hazard Facilities (gray form)

Q K-1: My system serves a severe health hazard facility (SHHF) that does not have an NPDES permit from the Department of Ecology. Do I have to include the facility on the gray form?

A: *Yes. Some SHHFs such as nuclear reactors do not have NPDES permits (or the equivalent). Some wastewater facilities do not have NPDES permits, because they discharge to another facility with a permit. DOH still considers these facilities SHHFs, because these premises pose a severe hazard to the water system.*

Q K-2: All the hose bibs at the SHHF that my system serves have “air gaps”, because they don’t have any hoses attached to the hose bibs unless we’re are using them. Do these qualify as in-plant air gaps for purposes of compliance?

A: *No! An approved in-plant air gap for a SHHF must be permanently installed and must be on the process water line, not at the fixture. DOH will send you (upon request) an illustration of an approved RPBA and in-plant air gap combination.*

Q K-3: My system has multiple water service connections to the same severe health hazard facility, a large wastewater treatment plant. I’ve reported the correct number of connections in the wastewater treatment plant row on the blue form. How should I report this information on the gray form?

A: *The current gray form doesn’t include a field for the number of service connections per facility. For the scenario you’ve described, please:*

- *List each connection as a different severe health hazard facility on the gray form (Facility index 1, 2, and so on.*
- *For each connection, describe the status of backflow prevention at the end of the reporting year, and provide details about the connection in the comment section (for example, this connection serves the lab building).*