



# 331-574 Cross-Connection Control ASR Forms

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This document provides Department of Health Office of Drinking Water (ODW) answers to questions about how to properly complete Cross-Connection Control (CCC) Annual Summary Report (ASR) forms. We answered general questions first; then form-specific questions.

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## Section A: Abbreviations and Acronyms

### Abbreviations and Acronyms

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

## Section B: General Questions

**B-1: If I properly complete, certify, and submit my system’s ASR Forms Package to ODW using the website, do I also need to submit signed hard copies of the completed forms to ODW?**

No. ASR systems must use the website to complete, certify, and submit **all** their required ASR forms for the reporting year. You **don’t** need to mail hard copies to ODW.

**B-2: If I properly complete, certify, and submit all my system’s required ASR forms to ODW via the website, will my PWS comply with the annual CCC reporting requirements of WAC 246-290-490(8)(d)?**

Yes.

**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 ASR forms should we complete for this reporting year and what should we report?**

At a minimum, all ASR systems must submit blue and cream forms and report CCC Program information for the previous calendar year. You should:

- ◆ Complete the cream form based on your written CCC Program Plan, policies, and procedures.
- ◆ On the blue form, page 1 Part 2, select the **“No”** radio button on CCC implementation activities. Fill out the rest of the blue form as much as possible. Enter a comment on your blue form explaining your plans and schedule to implement your CCC Program.
- ◆ Report information on your system’s implementation activities on next year’s ASR forms.

**B-4: We had no written CCC Program Plan and no CCC implementation activities this reporting year. Do we still have to submit ASR forms for this reporting year?**

Yes, at a minimum, all ASR systems must submit blue and cream forms. You should:

- ◆ Fill out the blue form as much as possible. On the blue form, page 1 Part 2, select the **“No”** radio button on written CCC Program Plan and the **“No”** radio button on CCC implementation activities.
- ◆ Fill out the cream form as much as possible and reflect any CCC policies or procedures you’ve developed or currently follow.
- ◆ Contact ODW as soon as possible for help in developing and implementing your CCC Program.

**B-5: Do I have to complete an Exception to Premises Isolation Form, if I didn't grant any *new* exceptions in the current reporting year?**

Generally, **no**, you **don't** need to complete any **new** Exception forms for this reporting year.

However, if you granted an exception in a past reporting year, but didn't submit a completed Exception form to ODW that reporting year, you must complete an Exception form for the previously granted exception. See J-3 for more information on this subject.

**B-6: Do I need to complete every field on the PWS Contact Screen and each ASR form?**

Generally, yes, you must complete most data fields on the **PWS Contact Information Screen** to successfully **Submit** your information and access new ASR forms. When you click Submit, the website will mark certain fields as "required" in red if you've left them blank.

Similarly, you must complete most data fields on the ASR forms to successfully **Submit** your ASR Forms Package to ODW. When you click **Ready to Submit** or **Ready to Submit All ASR Forms**, the website will mark certain fields on the ASR forms as "required" if you've left them blank.

This rule doesn't apply to fields the website completes for you. These fields appear grayed out, and the website disables them to block entry of data by users.

To summarize, the website flags missing required fields on the:

- ◆ **PWS Contact Screen** when you click **Submit**.
- ◆ **ASR forms** when you click **Ready to Submit**.
- ◆ **ASR forms** when you click **Ready to Submit All ASR Forms** from the **New/Edit/Print Forms Screen**.

**B-7: Is it OK to estimate number field values on my ASR forms?**

We discourage ASR systems from estimating values for number fields. You should always fill out your ASR forms as accurately as possible, because ODW uses ASR data as the basis for CCC compliance.

If you enter estimated values on any of your ASR forms, note this in the Comments Section for the specific form, explain why you don't have accurate data for this reporting year, and tell us what steps you're taking so you can report accurate data the next reporting year.

**B-8: When I'm working on one of my ASR forms, when do I click the *Save* button and when do I click *Ready to Submit*?**

Use the **Save** button to save your ASR form as a draft (work in progress). We recommend you **Save**:

- ◆ Before your session times out.
- ◆ When you must leave your computer during a data entry session.

- ◆ When your data entry session is interrupted by a phone call, visitor, need to go into the field, etc.

Note: Any time you change pages within an ASR form, the website auto-saves the data entered on the page you're leaving.

Click the **Ready to Submit** button when you're finished entering data for your entire ASR form. This will save your entire form and prompt the website to check for data errors within the form.

You can **Save** or click **Ready to Submit** from any page within an ASR form.

#### **B-9: When do I click the *Ready to Submit All ASR Forms* button on the New/Edit/Print Screen?**

When you're done filling out all your ASR forms, click the **Ready to Submit All ASR Forms** button on the **New/Edit/Print Forms Screen**. This action will trigger the website to check for data errors within and between forms.

#### **B-10: What should I do if the Data Errors Screen displays?**

If the **Data Errors Screen** displays, you'll need to resolve the data problems listed to complete the ASR Forms Package certification and submission process.

For data errors **within** ASR forms:

1. Click the page links to go to the page(s) with the error(s).
2. Look for the required fields messages and data logic messages (in red) to help you identify the data errors on that page.
3. Correct the errors noted and repeat the **Ready to Submit** process until the **New/Edit/Print Screen** displays and the ASR form's status changes to **Ready to Submit**.
4. When all your forms display a **Ready to Submit** status, click on the **Ready to Submit All ASR Forms** button on the **New/Edit/Print Screen**.

For data errors **between** ASR forms:

1. The website will note you've entered illogical data between ASR forms. The message will identify which two forms have conflicting data and state the problem.
2. Click the form and page links to go to the forms and page(s) with the error(s). Correct all the between form data logic errors listed on the screen.
3. Repeat the **Ready to Submit All ASR Forms** process until the **ASR Forms Package Certification and Submission Screen** displays.
4. Certify your final forms and **Submit the ASR Forms Package to ODW** to complete the reporting process for this year.

## B-10: If I find a mistake, can I update my ASR forms after I've certified and submitted my ASR Forms Package?

Yes, you can make changes to one or more of your certified/submitted ASR forms as long as you complete the corrections **before** the ASR due date (while the website is open/unlocked). Once the website is locked, you won't be able to change your submitted ASR forms.

Follow these steps to make changes to certified/submitted forms:

- ◆ On the **New/Edit/Print Screen**, click on the **Unsubmit All ASR Forms** button under the **Update Submitted Forms** heading.
- ◆ Select the ASR form you need to correct, and click the **Edit** button.
- ◆ You'll receive a pop-up warning. Click **Yes** to proceed. A message will display that all ASR forms for the reporting year have been unsubmitted.
- ◆ When you're done editing the selected ASR form, click the **Ready to Submit** button to prompt the website to check your data for errors (within the form).
- ◆ If the **Data Errors Screen** displays, correct the errors noted, and repeat the **Ready to Submit** process until the status of the form changes to **Ready to Submit** on the **New/Edit/Print Forms Screen**.
- ◆ Repeat this process for your other ASR forms as needed.
- ◆ When you're done correcting all your forms, click the **Ready to Submit All ASR Forms** button on the **New/Edit/Print Forms Screen**.
- ◆ Repeat the certification and submission process to submit your final, corrected forms package to ODW.

## Section C: Website Access Questions

### C-1: What is the web address for the ASR website?

The ASR website's address is [fortress.wa.gov/doh/ccc/](https://fortress.wa.gov/doh/ccc/)

### C-2: When I try to access the website, I get a message saying the page is not available.

The ASR website may be temporarily unavailable due to the programmer making updates. If you can't access the website, wait 15 to 30 minutes and try again.

Sometimes typing [fortress.wa.gov/doh/ccc/](https://fortress.wa.gov/doh/ccc/) in your browser's address box solves the problem.

If you're still have trouble accessing the website, contact your Information Technology (IT) staff, email [CCCprogram@doh.wa.gov](mailto:CCCprogram@doh.wa.gov), or call ODW CCC Program staff in Olympia for help.

## Section D: PWS Contact Information Screen

**D-1: We have several certified CCSs that work for our system. Whose name should appear on the PWS Contact Information Screen?**

We define CCC Program Manager and PWS Manager as follows.

**CCC Program Manager** is the certified Cross-Connection Control Specialist (CCS) who:

- ◆ Is designated by the purveyor to be in responsible charge of the CCC Program, as required in WAC 246-292-054(4).
- ◆ Manages the CCC Program for the PWS.
- ◆ Is responsible for the development and day-to-day implementation of the CCC Program.

**PWS Manager** is either the:

- ◆ Person that directly supervises the Designated CCS/CCC Program Manager; or
- ◆ Manager having direct oversight of the CCC Program.

Note: the PWS Manager doesn't need to be in charge of the entire PWS.

**D-1: In our water system, the same person fills both the CCC Program Manager and the PWS Manager roles. Do you want us to enter identical information in both columns on the PWS Contact Information Screen?**

We recommend you enter two different email addresses on the **PWS Contact Information Screen**, if you're a water system where the same person fills both the CCC Program Manager and the PWS Manager roles.

Since we send all ASR-related correspondence via email, we appreciate having two different email addresses for your system, in case one email address becomes corrupted, is no longer valid, or contains a typo. Providing two email addresses will help ensure that your system receives all our ASR-related emails.

**D-2: On the PWS Contact Information Screen, when should I use the Save button and when should I click Submit?**

Use **Save** to:

- ◆ Save your contact information as a draft (work in progress) for this reporting year.
- ◆ Update your information on the **Contact Information Screen only**. This action will **not** update the contact information on your ASR forms for this reporting year.
- ◆ Help ensure that we have updated contact information for your system for ASR-related correspondence.

### Use **Submit**:

- ◆ When you've finished entering data in all the required fields in both columns on the **Contact Information Screen**, and want the website to check your entries for errors.
- ◆ To trigger access to **new** ASR forms for this reporting year.
- ◆ Display your contact information on **new** ASR forms for this reporting year.
- ◆ Update/change your contact information on **saved** ASR forms for this reporting year.

**D-3: When I clicked the Submit button, the Contact Information Screen continued to display. Also, I can't access new forms for this reporting year on the Navigation Screen, because the Step 2: Start a New Form button is disabled (grayed out). What am I doing wrong?**

The **Submit** button on the **Contact Information Screen** prompts the website to check your system's contact information for errors.

If you remain on the **Contact Information Screen** after clicking **Submit**, you have data errors on this page. Errors may include:

- ◆ Missing required fields.
- ◆ Invalid phone number or email formats.
- ◆ Emails within a column that don't match.

To resolve the data errors:

1. Scroll down the page to see the problem fields marked in **red**.
2. Correct all data errors noted.
3. Click **Submit** again.
4. Repeat this process until you get the "Submit confirmation" message at the top of the **Navigation Screen**.
5. Once the Submit confirmation message displays, the Step 2 button will be enabled on the **Navigation Screen**, and you'll have access to new ASR forms for this reporting year.

## Section E: Required Field, Data Validation Error, Pop-Up, and Warning Messages

**E-1: When working on the PWS Contact Information Screen or one of my ASR forms, a red "required" displayed when I tabbed away from certain fields. What is this and what should I do?**

This is a **Required Field Message**. These messages appear when you've failed to enter data into a field ODW requires you to complete. You must complete all required fields to:

- ◆ Successfully **Submit** your **PWS Contact Information** and gain access to new ASR forms.

- ◆ Pass the data error checks **within** forms and change the status of each ASR form to Ready to Submit.
- ◆ Pass the data error checks **between** forms and proceed to the **ASR Forms Package Certification and Submission Screen**.

**E-2: When I tried to Submit my PWS Contact Information, a gray Validation Error message popped up. What is this and what should I do?**

This is a **Validation Error Message** pop-up for a missing phone number.

You must complete the phone number fields in both the CCS/CCC Program Manager and PWS Manager columns to successfully **Submit** your **PWS Contact Information** and gain access to new ASR forms.

**E-3: Sometimes I get a gray box that pops up when I leave a field on one of the ASR forms. What is this and what should I do?**

This is either a **Data Logic Message** or **Reminder Message** pop-up. We've developed:

- ◆ **Data Logic Messages** to let you know you've entered illogical data on an ASR form. For example, we've included data logic messages on pages 2, 3, 4, and 5 of the blue form.
- ◆ **Reminder Messages** to remind you to complete additional:
  - ASR forms, such as the Severe Health Hazard Facilities Form (gray) or new Exceptions Forms (green), based on the data just entered.
  - Steps to **Submit your ASR Forms Package** to ODW.

If you get a pop-up message, click "Close" to get rid of the pop-up box, and for:

- ◆ **Data Logic Messages**, correct the data entered, either in the field in question or in the comparison field, to make the values logical; or
- ◆ **Reminder Messages**, complete the additional ASR form(s) and/or form submission steps noted.

**E-4: A Warning! message box popped up when I clicked the Unsubmit All ASR Forms button. What is this and what should I do?**

This is a **Warning Message** pop-up. We've developed these messages to caution you about the action you're about to take and to make sure you want to proceed with the requested action.

If the **Unsubmit Warning Message** box displays, click the "Yes" button to proceed with the **Unsubmit** process. Select "No" to stop the requested action.



## Section F: Application Error Messages

**F-1: I received a CCC Application Error Message when I was working in the ASR website. Have I lost all my data? What should I do now?**

*No, we've designed the ASR website to prevent data loss.*

If you get an **Application Error Message**:

- ◆ Contact ODW CCC Program Staff right away.
- ◆ Follow the on-screen instructions.
- Don't work on the ASR form page or screen that triggered the error message until you hear from ODW.

When you receive an **Application Error Message**, the website automatically notifies DOH IT staff, so our programmer can troubleshoot the problem.

Once the programmer identifies the cause of the problem, ODW CCC staff will contact you.

We'll let you know we've fixed the error at ODW (if the website caused the problem), or we'll tell you what corrections you need to make to resolve the problem.

## Section G: Getting Help

**G-1: Where can I get help, if I'm not sure how to properly complete my system's ASR forms?**

We've posted documents on the **Downloads** page to help you complete your ASR forms.

Use the **Downloads** link in the left **Site Directory** to access the **Downloads** page. The left **Site Directory** displays on the **Navigation Screen**, **PWS Contact Information Screen**, and the **New/Edit/Print Forms Screen**.

If you can't find the answers to your questions, contact ODW CCC Program staff by email at [cccprogram@doh.wa.gov](mailto:cccprogram@doh.wa.gov) or by phone.

## Section H: CCC Activities Annual Summary Report (blue form)

Blue Form General

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

Generally, yes, with the following exceptions:

- ◆ **Page 1, Part 2.** If you answer "**No**" to the:
  - Written CCC Program Plan question, the Written Program Plan date field and the Written Program Plan column will be grayed out to block data entry.
  - CCC implementation activities question, the Being Implemented or Is Completed column will be grayed out to block data entry.

- ◆ **Pages 2 and 3, Part 3B and 3C.** If the PWS doesn't serve **any** severe or high-hazard premises, and you answer **"No"** to **Question 1** at the top of page 2, the website will gray out pages 2 and 3 to block data entry.
- ◆ **Page 3, Part 3C.** If the PWS serves severe or high-hazard premises in the **general** category, but doesn't serve any high-hazard **medical** category premises, and you answer **"No"** to **Question 2** at the top of page 2, the website will gray out page 3 to block data entry.
- ◆ **Page 5, Part 4B.** If you answer **"No"** to any of the page 5 questions, the website will gray out the related number fields to block data entry.

## Blue Form Page 1 Part 2: Status of CCC Program

**H-2: Our CCC Program Plan doesn't address the minimum elements in the WAC and ODW hasn't approved it. We just began implementing our program. How should we report this?**

Provide your answers using the following guidance:

1. **Written CCC Program Plan:** Check **"Yes"**, if the PWS has **any** written CCC Program Plan, policies or procedures, even if the program doesn't meet the WAC or isn't ODW-approved.
2. **CCC Implementation Activities:** Check **"Yes"**, if the PWS had **any** CCC implementation activities during the reporting year, such as:
  - a. Establishing legal authority.
  - b. Conducting hazard evaluations and requiring backflow assemblies to be installed to protect the PWS.
  - c. Requiring assembly testing.
  - d. Developing and maintaining CCC records.
  - e. Enforcing the PWS's CCC Program requirements..

## Blue Form Part 3: System Characteristics

**H-3: How do I count connections for purposes of Page 1 Part 3A? Do I use actual connections (as counted by our system), "ODW calculated," or "ODW-approved" as shown on our Water Facilities Inventory (WFI) form?**

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

For example, for WFI purposes, ODW 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.

For CCC purposes, the count of actual connections to the water distribution system is more useful than the count used for the WFI, since **actual connections represent conduits for contaminants to enter the public water system's distribution system**. We use residential and non-residential connection numbers to assess the reasonableness of data you report on the blue form pages 2, 3 and 4.

We recognize 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 in Part 3A warrants an explanation, enter additional information in Part 6 Comments and Clarification.

Note: we use WFI total connection information to identify which systems must submit ASR forms.

**H-4: On Parts 3B and 3C, the severe and high-hazard premises tables, should I include Table 9 premises that currently have only *in-premises* backflow prevention?**

Count the 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: severe and high-hazard premises with in-premises backflow prevention only **don’t** comply with the mandatory premises isolation requirements (by AG or RP) in the drinking water rules [WAC 246-290-490(4)(b)]. **Water systems reporting Table 9-type premises without premises isolation by AG or RP will be subject to ODW enforcement.**

**H-5: On Parts 3B and 3C, should I include severe and high-hazard premises that currently have only double check valve assemblies (DCVAs) installed for premises isolation?**

Follow the “counting” directions in QH-4 above.

Table 9 type premises isolated with DCVAs **don’t** comply with the requirements for mandatory premises isolation by AG or RP in the drinking water rules [WAC 246-290-490(4)(b)]. **Water systems reporting Table 9 type premises without premises isolation by AG or RP will be subject to ODW enforcement.**

**H-6: On Parts 3B and 3C, should I include “other” premises that we consider Table-9 type premises requiring isolation with an RP-type assembly?**

Table 9 of WAC 246-290-490 is **not** all-inclusive.

Thus, we expect water systems to use the “Other” rows near the bottom of the tables on pages 2 and 3 to identify other types of severe and high-hazard premises served by the PWS.

You may enter as many “other” rows as needed on pages 2 and 3. You may also group like premises into categories, for example, “Other Commercial” or “Other Manufacturing”.

**Don’t** enter **low-hazard** premises (such as tall buildings) on pages 2 or 3 where the water system requires a DCVA for premises isolation. In Part 1J of the cream form, indicate whether the PWS requires non-residential, **low-hazard** premises to install premises isolation preventers.

**H-7: On Part 3B, what shall I enter on the row pertaining to wastewater lift stations and pumping stations (non-residential only)?**

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 the 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 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 purveyor's Designated Cross-Connection Control Specialist/CCC Program Manager is responsible for making determinations of water use related to wastewater lift and pump stations.

**H-8: On Part 3B, should I include premises such as large grocery stores with meat departments as food processing plants?**

ODW doesn't generally include grocery stores with meat departments in the food processing plants category. However, PWSs that require premises isolation by AG/RP for such premises can report these grocery store connections in the "Other" row at the bottom of the table.

**H-9: For Part 3C, how can I find out the type and number of Medical Category premises my system serves?**

Use the **Medical Category Table Resource Information** on the ASR website's **Downloads** page. The Medical Category table lists websites and other information sources to help you determine whether your PWS serves any of the medical-type premises listed on Part 3C.

**H-10: For Part 3C, how should I count a connection that serves more than one type of medical category? For example, how should I count a building with a same-day surgery center and a psychiatric clinic?**

For multi-tenant facilities where you serve different medical category premises through a common service connection, count the connection under the medical category your Designated CCS considers to pose the highest contamination 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 table on page 3, Part 3C.**

**H-11: Will my water system be subject to compliance if I report medical premises that are not isolated by an RP or AG?**

Yes, unless you've granted the premises an exception to mandatory premises isolation based on the results of a recent hazard survey by your system's CCS.

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

**H-12: Can you clarify what the terms "premises isolation" and "in-premises prevention" mean?**

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 on the service line at or near the meter or property line (or where the service line first enters the building) to isolate the customer's entire plumbing system from the public water system. Premises isolation preventers directly protect the public water system's distribution system from contamination and are required for severe and high-hazard premises of the type on Table 9.
- ◆ **In-premises prevention** 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 customer's premises (area isolation). In-premises preventers protect the customer's plumbing system from contamination, and in most cases are required by the Uniform Plumbing Code amended for Washington. **Under the drinking water rules, water systems may rely solely on in-premises preventers to protect the public water system from contamination for non-Table 9 type premises only.**

**H-13: Many of the rows in the Backflow Preventer Inventory and Testing tables seem to ask for the same data. Can you clarify what the different rows mean?**

The two tables reflect ODW's interest in inventory and testing data for two different categories of backflow preventers:

1. **Premises isolation preventers** (Table 1).
2. **In-premises preventers** installed for fixture protection or area isolation (Table 2).

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, ODW is also interested in inventory and testing data on **existing** versus **new** backflow preventers. We're specifically interested in data on backflow preventers placed into service:

1. **Before** the current reporting year.

2. **During** the current reporting year.

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

If you don't track AVBs on irrigation systems, answer "**No**" to the AVB question located between Tables 1 and 2 on page 4. This will prompt the website to enter "unk" in the AVB column fields in rows 8 through 14.

**H-15:** What is a failure? Why is it important that all failures be counted and reported to ODW?

**We define a failure as any time a backflow preventer fails to pass a field test or inspection by a ODW-certified Backflow Assembly Tester (BAT) in the reporting year.** When this occurs, count it as one failure in the appropriate rows on the tables on page 4.

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

It's very important to count **all** backflow preventers that fail at least one test (or inspection) during the reporting year. ODW frequently receives requests or proposals to relax the annual testing requirement due to the apparent lack of failures. **ODW needs accurate failure rate data to justify the annual assembly testing requirement.**

**H-16:** We require some assemblies installed at severe health hazard facilities to be tested twice per calendar year. How should we report these tests and failures (if any) on the Backflow Preventer Inventory and Testing tables?

Count the multiple tests per calendar year as **one test**, since ODW is interested in knowing whether an assembly was tested **at least once** during the reporting year.

Similarly, if an assembly failed multiple tests in the reporting year, count the multiple failures as one failure.

**H-17:** How should we report detector assembly inventory and testing information?

Count each RPDA or DCDA as a single assembly, i.e. only **once** in the **RPDA** or **DCDA** column as appropriate. **Don't count the bypass separately.**

Count as **one test** the tests of the mainline assembly and bypass assembly. Count as **one failure** the failure of either the mainline or bypass assembly or both assemblies.

Count an entire detector assembly removed from service as **one assembly removed from service.**

Do not count a bypass assembly replacement as a detector removed from service.

**H-18: Our system tracks both premises isolation and in-premises/fixture protection backflow preventers. Which ones do we report in Part 4A?**

In Part 4A, report preventers that provide the **primary** means of backflow prevention for the public water system. In other words, count the preventers that **directly** protect the public water system from contamination. You must count and report the following backflow preventers:

- ◆ Premises isolation backflow preventers.
- ◆ Fixture protection (or area isolation) backflow preventers that directly protect the public water system. You must report these for connections **where no premises isolation backflow preventer is installed**.

To illustrate, consider the following examples:

**Example 1: Table 9 Facility with Premises Isolation**

- ◆ A premises isolation RPBA is installed on the service line to the facility at the meter.
- ◆ All fixtures within the facility's plumbing system have the proper backflow preventers.
- ◆ Count and report only the premises isolation RPBA. Include the count in Part 4A Table 1.

**Example 2: Non High-Hazard Facility with Dedicated Irrigation Line without Chemical Injection**

- ◆ A DCVA is installed on the dedicated irrigation line to this facility.
- ◆ No other hazards have been identified for this facility.
- ◆ Count and report the DCVA as a **Premises Isolation Preventer** in Part 4A Table 1.

**Example 3: Non High-Hazard Facility with Fixture Protection Only (no premises isolation).**

- ◆ Your system serves a small convenience store. Your CCS's hazard survey determines this is not a high-hazard facility and does not require a premises isolation backflow preventer.
- ◆ The store decides to install a carbonated beverage machine.
- ◆ As required by the Uniform Plumbing Code amended for Washington, the owner installs an RPBA on the water supply line to the carbonated beverage machine.
- ◆ The purveyor relies on the in-premises, fixture protection RPBA on the beverage machine to protect the public water system.
- ◆ Count and report the RPBA as an **In-Premises Preventer** in Part 4A Table 2.

We're aware that some municipal purveyors track all assemblies within their cities. To ensure proper reporting on your ASRs, you should track the following for each backflow preventer in your database:

- ◆ **Function:** whether the backflow preventer is installed for premises isolation or in-premises prevention (fixture protection or area isolation).
- ◆ Whether the backflow preventer **directly** protects the public water system, so you can determine whether you need to include it in the counts in Part 4A.

**H-19: Can you give an example on how to properly complete one of the Part 4A tables?**

Yes. Assume that:

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

Assume that during the reporting year:

1. **8 new** premises isolation DCVAs were installed as follows:
  - a. **5** were installed at connections not previously protected.
  - b. **3** were installed to replace existing DCVAs (beyond repair).
2. All **8 new** DCVAs were tested upon installation and **1** failed.
3. **2 existing** premises isolation DCVAs were replaced by premises isolation RPBA's (due to a change in use of the premises).
4. **1 existing** premises isolation DCVA was removed from service (building demolished).

Report the entries in Table 1 under the DCVA column for rows 1-7 as follows:

| <b>Backflow Preventer Category and Inspection/Testing Information</b>                            |   | <b>DCVA</b> |
|--|---|-------------|
| <b>Table 1: Premise Isolation Preventers (include preventers isolating PWS-owned facilities)</b> |   |             |
| <b>Existing Premises Isolation Backflow Preventers</b>   |   |             |
| 1  | In service at beginning of reporting year   | <b>50</b>   |
| 2  | Inspected and/or tested in reporting year   | <b>45</b>   |
| 3  | Failed inspection or test in reporting year | <b>4</b>    |
| <b>New Premises Isolation Backflow Preventers</b>  |   |             |
| 4  | Installed in reporting year                 | <b>8</b>    |
| 5  | Inspected and/or tested in reporting year   | <b>8</b>    |
| 6  | Failed inspection or test in reporting year | <b>1</b>    |
| <b>Premises Isolation Backflow Preventers (existing or new)</b>                                  |   |             |
| 7  | Removed from service in reporting year*     | <b>6*</b>   |
| <b>Total Premises Isolation Preventers at End of Reporting Year**</b>                            |   | <b>52**</b> |

*\*Preventers taken out of service include those that were replaced, whether or not the replacement preventers were of the same type or a different type. In this example, the 6 DCVAs taken out of service include 3 replaced by new DCVAs, 2 replaced by RPBA's, and 1 removed but not replaced.*



*\*\*The website calculates the Total of 52 DCVAs as follows: 50 existing DCVAs plus 8 new DCVAs installed during the reporting year, minus 6 taken out of service. In this example, you should report the 2 new premises isolation RPBA's (replacing the DCVAs) in the Table 1 RPBA column in row 4 (installed in the reporting year).*

## Blue Form Page 5 Part 4B: Other Implementation Activities

### H-20: Can you explain what you're looking for in the On-Site Hazard Surveys table?

We're interested in knowing:

- ◆ Whether your system's CCS conducted any hazard surveys during the reporting year and the **total number of surveys** conducted.
- ◆ Of the hazard surveys conducted in the reporting year, how many **new connections** and how many **existing connections** your CCS evaluated for cross-connections.
- ◆ Of the connections surveyed in the reporting year, how many **new connections** and how many **existing connections** required backflow prevention to protect the public water system from contamination. For reporting purposes, you should include connections where your CCS required either premises isolation or in-premises preventers to protect the public water system.
- ◆ For **existing** connections requiring backflow prevention, count connections that needed a new backflow preventer (no backflow preventer installed previously), additional backflow prevention (for example, premises isolation), or a more protective backflow preventer (RP required where had DC before).

For example, during the reporting year, your CCS conducted a hazard survey of an existing hospital. The CCS found 4 connections, and none of them had premises isolation backflow preventers installed. For this scenario, you would:

- ◆ Answer "Yes" to the hazard survey question and report conducting one (1) on-site hazard survey.
- ◆ Report four (4) connections surveyed for hazards to PWS (in row #1 of hazard survey table in the **existing** column).
- ◆ Report that four (4) connections required backflow prevention to protect the public water system from contamination (row #2 of hazard survey table in the **existing** column).

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

### H-21: Do we include water leaks (at joints) as "main breaks"?

Do not count leaks at joints or corporation stops as main breaks. However, if your system didn't distinguish between these for the reporting year, estimate the number of main breaks in Part 5, and provide an explanation in the Part 6: Comments and Clarifications section of the blue form. Next reporting year, track and report main breaks separately from water leaks.

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

Yes, you should include planned or scheduled water outages as water outage events, because they may result in backflow from connections to premises without backflow prevention.

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

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

Generally, yes, except for fields the website completes for you. The website disables and grays out these fields.

Please note the website completes Part 1L row 3 on page 3 of the cream form based on your water system’s past Exceptions (green form) data.

### I-2: Does the cream ASR form include data error checks like the other ASR forms?

Yes, like the other ASR forms, the cream form includes data error checks to help users provide complete and logical CCC data.

Click **Ready to Submit** to trigger the data checks within the form. If the **Data Errors Screen** displays:

1. Click the page links to go to the page(s) with the error(s).
2. Look for the required fields messages and data logic messages (in red) to help you identify the data errors on that page.
3. Correct the errors noted and repeat the **Ready to Submit** process until the **New/Edit/Print Forms Screen** displays and your cream form’s status changes to **Ready to Submit**.

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

Report on the status of your written CCC Program Plan at the end of the reporting year (December 31<sup>st</sup>).

Note in **Part 3: Comments and Clarifications**, that you’re revising your written CCC Program Plan.

Next year, update your cream form responses based on the revised CCC Plan.

### I-4: On page 1, Part 1A, why doesn’t the Program Type list include a category where the PWS relies solely on an In-Premises Prevention (fixture) type of a CCC Program?

*Implementation of a CCC Program that relies on In-Premises Prevention (fixture protection) as the only method of backflow prevention **does not** comply with the Washington’s state drinking*

water regulations [WAC 246-290-490(2)(f)]. Under the WAC, the water system must implement either

1. Premises isolation only program.
2. Combination program that relies on both premises isolation and in-premises prevention.

**Per WAC 246-290-490(4)(b), the water system must be protected from backflow from severe and high-hazard premises (such as those listed on Table 9) by a premises isolation RP or AG. Severe hazard premises require additional backflow prevention (in-plant air gaps) if an RP-type assembly is installed for premises isolation.**

Some water systems may not currently serve any severe or high-hazard premises requiring mandatory premises isolation. However:

- ◆ When a **high-hazard** facility applies for water service, the water system must require a premises isolation AG or RP to be installed **before** providing service.
- ◆ If a **severe hazard facility** applies for water service, the water system must require backflow prevention per WAC 246-290-490(4)(b)(ii) to be installed **before** providing service.

## Cream Form Part 1B: Coordination with Authority Having Jurisdiction (AHJ).

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

For ASR purposes, the term “AHJ” means the local official, department, or agency that enforces, in the water system’s service area, the plumbing code adopted by the Washington State Building Code Council.

**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.

The Uniform Plumbing Code (UPC) amended for Washington is the current state plumbing code. The term “AHJ” replaces the term “Local Administrative Authority” (LAA) used previously in the UPC.

Do **not** list ODW, other local health jurisdictions, fire districts, or other state agencies as AHJs, since they don’t enforce the UPC.

## Cream Form Part 1D: Typical Program Responsibilities

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

*Generally we mean the entity that arranges and directly pays for the CCC Program Activity listed..*

## Cream Form Part 1E: Backflow Prevention for Fire Sprinkler Systems

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

Enter the **larger** number of days in the range, since you can enter only one value in each "number of days" field. The website blocks entry of text or characters (such as dashes or math symbols) in these fields.

## Cream Form Part 1J: Backflow Prevention for Non-Residential Connections

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

Examples of non-residential customers in the various categories include but are not limited to:

- ◆ Commercial: Stores, shopping centers, gas stations, restaurants, office buildings.
- ◆ Industrial: Plants for manufacturing aircraft, automotive, electronic, or wood products.
- ◆ Institutional: Schools, college campuses, and government buildings.

## Cream Form Part 1L: Policies Regarding Exceptions to Mandatory Premises Isolation

**I-9: How do I fill out Page 3 Part 1L about my system's Exceptions policies and procedures? Why can't I enter data in Row 3?**

The following describes the items in Part 1L:

- ◆ **Row 1:** Your written CCC Program Plan should specify whether your water system allows or prohibits Exceptions. Select the "Yes" or "No" radio button to reflect your system's choice. If your CCC Program Plan is silent on the issue of Exceptions, or if you don't have a written Program Plan, select the "Doesn't Address" radio button.
- ◆ **Row 2:** If your water system granted or would consider granting **new** Exceptions in the reporting year, select the "Yes" radio button (regardless of your answer in Row 1).
- ◆ **Row 3:** The website answers this question for you based on your water system's Exceptions history from past reporting years. The website will select the "Yes" radio button if your system reported granting any Exceptions in past reporting years (regardless of your answers in either Row 1 or Row 2).

**Note:** Selecting the "No" radio button in Row 2 will block access to **new** Exception (green) forms. If the "Yes" radio button in Row 3 is checked, you'll be able to access **past** Exceptions on the **List of Exceptions Screen** to view, print, renew, or cancel. See J-4 for more information.

## Cream Form Part 2: CCC Program Record-Keeping Software

**I-10: We used Access, Excel, or other similar software to develop our water system's CCC record-keeping system. Is that considered "Custom-Developed" CCC software?**

Use the guidelines below to help answer your question. Select:

- ◆ **Custom Developed for or by PWS** if your water system's CCC record-keeping system took considerable time and effort to develop (requiring the expertise of database programmers) and includes many automated operations.
- ◆ **Other Commercial (non-CCC) Software** if your water system uses commercial software such as Access or Excel essentially off-the-shelf ("as is") or with minimal customization.

If your water system uses commercially available CCC software (such as Tokay or XC2) customized for your system, identify the name of the commercial software used. **Do not** select "Custom-Developed".

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

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

An **Exception** is a **waiver from mandatory premises isolation** (with an RPBA or AG) granted to the customer by the purveyor.

The drinking water rules don't require purveyors to grant exceptions. Instead, under WAC 246-290-490(4)(b)(iii), purveyors have the **option** to grant exceptions. Purveyors **may** grant exceptions:

- ◆ On a case-by-case basis to premises that would normally require mandatory premises isolation per Table 9 of WAC 246-290-490.
- ◆ To specific high-hazard premises, only if the purveyor's CCS determines that **no hazard exists**.

Your water system's CCC Program Plan should specify whether your system, by policy, grants or doesn't grant Exceptions. See the guidance document [331-234 CCC for Small Water Systems](#) for more information.

**J-2: Our water system granted a new Exception in the reporting year, and we renewed some past Exceptions. Does our system have to complete every field on the Exception (green) form to pass the data error checks within the form?**

Generally, yes. Pay attention to the following parts of the green form:

### Part 2: Premises Information

- ◆ You must complete the **Premises Name, Service Address, and Premises Type** fields since they're required fields.

- ◆ Make sure you select the applicable **Table 9 Premises Type or Category** from the dropdown box. Otherwise your Table 9 category will be recorded as **Agricultural**.

### Part 3: Hazard Evaluation and Exception Dates

- ◆ You must enter dates in Rows A through D since they're required fields. Establishing an **Exception Expiration Date** and **Next Hazard Evaluation Date** helps ensure the water system's designated CCS periodically reviews and confirms the validity of the Exception.
- ◆ To ensure protection of the public water system, ODW recommends that the purveyor's designated CCS re-evaluate all Exceptions every 1-2 years (or more frequently if a tenant change or change in use of the premises or plumbing is likely).

### Part 4: Justification for Granting Exception to Premises Isolation

- ◆ You must report at least one reason for granting the Exception (this is a required field).
- ◆ If none of the typical reasons listed apply to your Exception, type your justification in the "Other" row text box, and check the "Other" row check box.

**J-3: Should I access and click the Save or Ready to Submit button on a new Exception (green) form if I didn't grant any exceptions during the current reporting year?**

**No.**

If you accidentally start a new green form, click the **New/Edit/Print Screen** button at the bottom of the form to exit the form without saving. If you've already saved a new green form (or renewed a past form) by accident, J-5 (below) explains how to **Cancel** a saved Exception form.

Note: the website will block you from saving or submitting a blank green form.

**J-4: I want to fill out a new Exception (green) form, but the New green forms button on the New/Edit/Print Forms Screen is grayed out/disabled. What should I do?**

We base your access to new green forms on your answers to either of the following:

- ◆ **Blue form Page 5 Part 4B.** If you report that your system granted new premises isolation exceptions in the reporting year, you'll have access to new green forms.
- ◆ **Cream form Page 3 Part 1L.** If you select the "Yes" radio button on row 2, you'll have access to new green forms. See Q-I-9 form more information on Part 1L of the cream form.

Access to **new** green forms will be blocked if you:

- ◆ Haven't started a new blue or cream form.
- ◆ Haven't completed the new Exceptions question on page 5 Part 4B of a saved blue form or the second row of page 3 Part 1L of a saved cream form.
- ◆ Reported on page 5 of your saved blue form that you didn't grant any new Exceptions in the reporting year, and reported on your saved cream form that your system doesn't grant new Exceptions (selected the No radio button on page 3 Part 2L row 2).

**J-5:** I want to Cancel an Exception I previously saved or submitted to ODW, because it is no longer valid or needed. How do I cancel a specific Exception?

To cancel the Exception, follow the steps below:

1. Go to the **New/Edit/Print Screen**.
2. Click the **Exceptions List** button in the Exceptions Section at the bottom of the screen.
3. On the **List of Exceptions**, find the Exception of interest (by premises name) and click the **Cancel** button.
4. Complete the **Cancellation Form**. You must provide at least one reason for cancelling the Exception.
5. Adjust the **Date Cancelled** if needed.
6. Click **Submit** at the bottom of the **Cancellation Form**.

To verify you've successfully cancelled the Exception, access the Exceptions List. The status of the cancelled Exception will change to **Cancelled**.

**Note:** cancelled Exceptions will appear on the **Exceptions List** only in the reporting year in which they were cancelled. Cancelled Exceptions will not display on the **Exceptions List** in future reporting years.

**J-6:** I want to *renew* an expired Exception. Can I renew this Exception without having to complete a new Exception form?

**Yes.** Follow the steps below:

1. Go to the **New/Edit/Print Screen**.
2. Click the **Edit/Cancel/Print** button in the Exceptions Section.
3. On the **List of Exceptions**, find the expired Exception (by premises name) and click **Renew**.
4. Complete all the required fields on the **Renewal Form** and click Submit when finished.

**J-7:** I granted Exceptions in the reporting year to certain premises in response to ODW compliance directives (based on ASR information submitted before the current reporting year). I sent ODW *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?

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

**J-8: My Exceptions List includes several “old” Exceptions with a status of Expired (assumed) or Expired (expiration date). Do I need to address these?**

Yes, you must cancel or renew all expired Exceptions to successfully submit your ASR Forms Package to ODW. Follow the instructions in:

- ◆ J-5 to **cancel** an invalid Exception.
- ◆ Q-J-6 to **renew** an Exception that is still valid.

**J-9: Our system serves a “mortuary” that provides funeral services only (no embalming or processing of bodies) and a chiropractor with digital X-ray equipment. We granted Exceptions to these facilities in the past. However, we noticed that on the blue form page 3, we now only need to report mortuaries with water-connected embalming equipment and chiropractors with water-connected X-ray equipment. Can we cancel these Exceptions?**

**Yes**, you may cancel these Exceptions, because they are no longer needed.

For 2015 and thereafter, on page 3 of the blue form, you only need to report:

- ◆ Mortuaries with water-connected embalming equipment.
- ◆ Chiropractors with water-connected X-ray equipment since these facilities pose a high-hazard to your system. Purveyors requested these changes We made these changes at the request of many ASR systems since .

**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?**

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)**

**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?**

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. ODW still considers these facilities SHHFs, because these premises pose a severe hazard to the water system.

**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 using them. Do these qualify as *in-plant air gaps* for purposes of compliance?**

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. ODW will send you (upon request) an illustration of an approved RPBA and in-plant air gap combination.

**K-3: My system has multiple water service connections (4) to the same severe health hazard facility (SHHF), a large wastewater treatment plant. I’ve reported the correct number of connections (4) in the wastewater treatment plant row on page 2 of the blue form. How should I report this information on the gray form?**

We’ve improved the gray form so you can now list multiple SHHFs and multiple service connections per facility. For the scenario you’ve described, please:

1. Enter the facility information in the Facility 1 of 1 data fields.
2. Scroll down and identify the first connection to this facility **by name**. This is a required field. Example connection names could include process water line, dedicated fire line, dedicated irrigation line, lab building water line, etc.
3. Use the dropdown box and select the applicable backflow prevention status for Connection 1 at the end of the reporting year.
4. Provide details about the connection in the comment section (for example, this connection serves the lab building).
5. Since you serve more than one connection to the same SHHF, click the “Add Connection” button to display another connection row for Facility 1.
6. Repeat the above steps for each connection listed under Facility 1, until you’ve completed the requested information for all 4 connections (for example, Facility1 Connection 1 of 4, Connection 2 of 4, Connection 3 of 4, and Connection 4 of 4).

**K-4: My system has serves more than one severe health hazard facility (SHHF). We serve 2 wastewater treatment plants with one connection each. I’ve reported the correct number of connections (2) in the wastewater treatment plant row on page 2 of the blue form. How should I report this information on the gray form?**

We’ve improved the gray form so you can now list multiple SHHFs and multiple service connections per facility. For the scenario you’ve described, please:

1. Enter the information for the first SHHF in the **Facility 1 of 1** data fields.

2. Scroll down and complete the information for the connection to this facility by name. The name field is required. Example connection names could include process water line, dedicated fire line, dedicated irrigation line, lab building water line, etc.
3. Use the dropdown box and select the applicable backflow prevention status for Facility 1 **Connection 1 of 1** at the end of the reporting year.
4. Provide details about the connection in the comment section (for example, this connection serves the lab building).
5. Since you serve more than one SHHF, click the "Add Facility" button to display another facility data entry box.
6. Complete the information for the second SHHF in the **Facility 2 of 2** data fields.



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