



Department of Health
Center for Drinking Water Quality
Room 209, 3 Capitol Hill
Providence RI 02908-5097
www.health.ri.gov
Phone: (401) 222-6867
Fax: (401) 222-6953 TTY: 711

December 18, 2020

CERTIFIED MAIL

PWS# RI1592023
Robin Weber
Prudence Island Water District
PO Box 100
Prudence Island, RI 02872

7020 2450 0000 9710 9684

Dear Ms. Weber,

Pursuant to the provisions of R.I.Gen.Laws 46-13-22, the Rhode Island Department of Health (RIDOH) has adopted regulation to protect public water system (PWS) distribution and transmission infrastructures from contamination through cross-connections. Per requirements of section 1.9.4(A)(1) of the Rhode Island Public Drinking Water Regulations, 216-RICR-50-05-1, (hereinafter "Regulations"), all community and non-transient, non-community PWS are required to comply with the provisions of this subsection in the Regulations and self-certify to RIDOH of the preparation and implementation of a plan, detailing their cross-connection control program. Per section 1.9.4(C)(1)(d)(1) of the Regulations, surveying new and existing service connections, determining levels of hazard, and selecting appropriate backflow preventers by a certified cross-connection surveyor shall be conducted no later than 5 years after the plan certification date.

As a community public water system with multiple service connections, Prudence Island Water District (PIWD) certified, on March 16, 2010, that PIWD has adopted a Cross-connection Control Plan (CCCP) that meets or exceeds all requirements of the Cross-connection Control Regulations identified in the Rhode Island Rules and Regulations Pertaining to Public Drinking Water, Section 9.4. In the Certification, PIWD agreed to survey new and existing service connections, determine levels of hazards, and select appropriate backflow preventers, and completion of this requirement shall take no longer than 5 years after the plan certification date.

In the PIWD CCCP, amended on May 28, 2019, section 4.d states that PIWD will plan and implement a program that determines a suitable timeframe for the inspection and/or testing of all backflow preventers by a certified backflow inspector/tester. Section 7 of the CCCP states that cross-connection control surveys will be completed by persons under the direction of, or having a current certification from, a recognized certification program accepted by the RIDOH and the PIWD. To be clear, as stated above, per the requirements of sections 1.9.4(C)(1)(d)(1), 1.9.4(C)(1)(d)(3), and 1.9.4(E)(1) of the Regulations, surveys must be conducted by a certified cross-connection surveyor and inspection and testing of backflow preventers must be conducted by a certified backflow preventer inspector/tester.

In the First Amendment and Restatement of the *Consent Order between Rhode Island Department of Health Center for Drinking Water Quality and the Prudence Island Water District*, signed on June 10, 2020 by PIWD and signed on June 15, 2020 by RIDOH Center for Drinking Water Quality, the PIWD has until August 1, 2020 (new compliance date is December 1, 2020) to attain compliance through implementation of a cross connection control plan, including the inspection of existing backflow preventers and installation and inspection of backflow preventers at locations where a proper backflow preventer is not present, at each service connection in accordance with the plan referenced in this Consent Order.

Based on the February 28, 2019 Consent Order (as amended June 15, 2020) Progress Report for Quarter Ending December 10, 2020, which was submitted on December 9, 2020, PIWD reported 100% compliance with the Cross-connection Control Plan by December 1, 2020. While, RIDOH understands that efforts have been taken to comply with the provisions of section 1.9.4 Cross-connection Control in the Regulations, the CCCP and the Consent Order to protect the PWS, clarification is required on certain aspects of what has been completed to date. Please answer the following questions to demonstrate compliance with the CCCP and the Consent Order. Further actions will be required if all the requirements in the CCCP and/or the Consent Order have not been accomplished.

1. PIWD states that there are 314 service connections in their system but then states that there have been 314 backflow preventers installed and, in addition, 14 service connections have been shut-off for lack of installation of backflow preventers. This totals to 328 connections. Please explain.
2. PIWD states that 314 service connections have backflow preventers installed and they were all inspected. Were these inspections completed by a certified backflow inspector/tester(s)?
3. PIWD states that 59 surveys have been completed. Were these surveys completed by a certified surveyor(s)?
4. Does PIWD know if each backflow preventer installed on the 314 service connections was installed in the correct location?
5. How many of the 314 connections have drain back valves located below grade?
6. For the connections that have drain back valves located below grade, is it known if the installed backflow preventers are installed upstream of the drain back valves?

A response from PIWD to these questions is required to be provided to RIDOH by December 28, 2020. If you have any questions, feel free to contact me at amy.parmenter@health.ri.gov or 401-222-7771.

Sincerely,



Amy B. Parmenter
Interim Chief
Center for Drinking Water Quality

Cc: Carlene Newman, RIDOH
Garth Hoxsie-Quinn, RIDOH
Hui Chen, RIDOH
Will Capron, PIWD (by email)