# Appendix 2


# CROSS-CONNECTION CONTROL PLAN

Montebello Land and Water Company

June 10, 2025

## Public Water System Overview

| | |
|---|---|
| **Public Water System Name** | Montebello Land and Water Company |
| **Public Water System Number** | 1910091 |
| **Single-Family Service Connections** | 2447 |
| **Multifamily Residential Service Connections (duplex, apartments, etc.)** | 1014 |
| **Commercial Service Connection** | 486 |
| **Industrial Service Connection** | 16 |
| **Landscape Irrigation Service Connections** | 3 |
| **Fire Protection Service Connections** | 83 |

Table of Contents



Exhibits

## Cross-Connection Control Program Operating Rules

On June 10, 2025, the Board of Directors of Montebello Land and Water Company (MTBLW) established this Cross-Connection Control Plan (the "Program"). The MTBLW Rules and Regulations were also amended by the Board as set forth in Exhibit A hereto to ensure that corrective actions will be taken if a customer fails to comply with the Program requirements regarding the installation, inspection, testing, or maintenance of backflow prevention assemblies.

The Program shall follow and implement the California Cross-Connection Control Policy Handbook (CCCPH) promulgated by the State Water Resources Control Board (SWRCB) pursuant to its authority under California's Safe Drinking Water Act, Cal. Health & Safety Code §§116270-116755, specifically, §§ 116407 and 116555.5.

## Cross-Connection Control Program Coordinator

MTBLW is responsible for administering the Program and will employ or retain at least one certified Cross-Connection Control Specialist (CCCS). The individual will serve as the Company's Cross-Connection Control Coordinator responsible for:

- Developing and implementing the Program
- Establishing general policy direction and risk management decisions
- Reviewing and approving all Hazard Assessments
- Reporting, Tracking, and other administrative duty oversight

The CCCS or their designees can be contacted within one hour in the event of a cross-connection incident.

*As an alternative, when no staff or employees are properly qualified, MTBLW may retain a CCCS on contract to provide the necessary expertise and services.*

MTBLW Cross-Connection Control Coordinator employee:

| | |
|---|---|
| **Name of Coordinator** | Brett Ommen |
| **Telephone Number** | 323-722-8654 |
| **Email Address** | Brett@MTBLW.COM |
| **CCCS Certification Number** | 03683 |
| **Certifying Agency** | CA-NV AWWA |

## Hazard Assessments

MTBLW shall evaluate the degree of potential health hazard to the potable water distribution system, which may result from conditions existing on a water user's premises. MTBLW, however, shall not be responsible for the abatement of cross-connections, which may exist within a water user's premises. As a minimum, the hazard assessment will consider the existence of cross-connections, the nature of materials handled on the

subject property, the probability of a backflow occurring, the degree of piping system complexity and the potential for piping system modification.

Special consideration shall be given to the premises of the following types of water users:

(1) Premises where substances harmful to health are handled under pressure in a manner that could permit their entry into the potable water distribution system. This includes chemical or biological process waters and water from potable water distribution system supplies that have deteriorated in sanitary quality.

(2) Premises having an auxiliary water supply, unless the auxiliary water supply is accepted as an additional source by MTBLW and is approved by the Los Angeles County Department of Public Health (LADPH).

(3) Premises that have internal cross-connections that are not abated to the satisfaction of MTBLW or LADPH.

(4) Premises where cross-connections are likely to occur and entry is restricted so that cross-connection inspections cannot be made with sufficient frequency or at sufficiently short notice to assure that cross-connections do not exist.

(5) Premises having a repeated history of cross-connections being established or re- established.

The hazard assessments will be carried out using a combination of on-site evaluations and customer-completed surveys to gather essential information of potential hazards. All hazard assessments will be reviewed and approved by the Cross-Connection Control Program Coordinator to ensure compliance.

Subsequently to the initial hazard assessment MTBLW will perform a hazard assessment under the following criteria:

- If a user's premises changes account holder, excluding single-family residences;
- If a user's premises is new or is re-connected to MTBLW water systems;
- If evidence exists of changes in the activities or material on a customer's premises;
- If backflow from a customer's premises occurs;
- If the State Water Resources Control Board requests a hazard assessment of a customer's premises;
- If MTBLW concludes that an existing hazard assessment may no longer accurately represent the degree of hazard; and
- periodically (pursuant to CCCPH section 3.1.4.).

MTBLW will require residential customers to complete a hazard assessment survey. Information provided by the customer may result in further investigation on the degree of hazard it might pose to the water system.

If customer fails to provide the required information for a hazard assessment or does not submit a completed Customer Survey, MTBLW may take corrective actions to protect the public water system. This may include having the customer install a Reduce Pressure Principle Assembly (RP) or an Air Gap (AG) for premises containment (meter protection). Any cost associated with these actions will be the customer's responsibility.

### MTBLW Facilities

MTBLW will conduct a comprehensive assessment of its facilities to identify and mitigate potential cross-connection risk. All facilities producing, treating, storing, or distributing drinking water must have proper internal protection from cross-connection to ensure that all drinking water produced and delivered to MTBLW customers is protected from cross-connections. These safeguards are essential to ensure that all drinking water produced and delivered to MTBLW customers remains free from contamination and is fully compliant with regulatory standards.

### User Supervisor

MTBLW may require a water user to designate a User Supervisor when the user premises has a multi-piping system that conveys various types of fluids and where changes in the piping system are frequently made. The user supervisor is responsible for the avoidance of cross-connections during the installation, operation and maintenance of the water user's pipelines and equipment.

The User Supervisor represents the owner, tenant, or property manager as a liaison to MTBLW. The User Supervisor must have the authority to carry out any requirements of MTBLW. The User Supervisor must be trained on the fluids used and backflow protection for the premises, must inform MTBLW of changes in piping, and maintain current contact information on file with MTBLW.

User Supervisor:

- Is responsible for the avoidance of cross-connections during the installation, operation and maintenance of the water user's pipelines and equipment
- Must be present at all hazard assessments and cross-connection control surveys
- Must inform MTBLW of any cross-connection incidents
- Is expected to know the provisions contained in the SWRCB CCCPH
- Is expected to know the concepts of backflow and cross-connection prevention and emergency response procedures
- Is responsible for training personnel at the site on the proper protection of the potable water system.

## Backflow Prevention Requirements

MTBLW will require that water service to all commercial customers be isolated at the meter by an approved RP assembly. However, at the discretion of MTBLW, it may permit the continued use of an existing backflow assembly, provided if it offers a level of protection equal to the degree of hazard present at the customer's premises. If a backflow assembly fails testing, it must be replaced with an RP assembly upon notification of the failure. All high-hazard connections, as specified in Appendix D of the CCCPH (replicated as Exhibit B), must be isolated using an RP assembly or AG.

All customers requiring backflow prevention must ensure that the required premises containment meets the following conditions:

- The backflow prevention assembly must be purchased and installed by the customer (at the customer's expense) immediately downstream of the water meter, in full compliance by MTBLW standards.
- The backflow assembly must be properly maintained, tested, and inspected in accordance with MTBLW requirements outlined in this plan.

Under special circumstances, MTBLW may grant an exception allowing the use of a DC assembly, provided it offers protection equivalent to the degree of hazard.

MTBLW recognizes the City of Montebello Fire Department (Fire Department or FD) authority over fire protection systems will not override its decisions unless a customer's fire protection system is specifically to accommodate the pressure drop associated with an RP assembly. Since fire protection systems are approved and regulated by the Fire Department, any modifications to these systems fall outside the MTBLW jurisdiction. However, in the interest of public health and water quality protection, MTBLW will strongly advise customers against adding chemicals to their fire protection systems.

**Approved Backflow Prevention Assemblies and Installation**

Any backflow prevention assembly required for protection of MTBLW water system is approved through both laboratory and field evaluation test performed in accordance with:

- Standard found in Chapter 10 of the Manual of Cros-Connection Control, Tenth Edition, published by the University of Southern California Foundation for Cross-Connection Control and Hydraulic Research.

A list of backflow assemblies approved by USC and accepted by MTBLW can be found at https://fccchr.usc.edu/list.

All previously installed backflow prevention assemblies which do not meet the requirements of this section but were approved at the time of installation and have been properly maintained and tested, shall be excluded from the requirements. If these backflow preventor assemblies fail, they shall be replaced with approved assemblies mentioned in this section.

Backflow protection must be located as close as practical to the water user's service connection unless one or more alternative locations have been approved by MTBLW.

Devices with unapproved modifications or in unapproved configurations or orientation will be retrofitted with an approved method of backflow prevention assembly installed in accordance with MTBLW's installation requirements, at the expense of the customer. All backflow assembly installations shall meet the requirements of the CCCPH.

Existing systems with single detector check valve (untestable devices) will require retrofit. A minimum of a Double Check-Detector Assembly shall be installed and brought above grade. New customers are required to upgrade the backflow protection assembly to current standards prior to water service being provided.

Notwithstanding other provisions contained herein, installations that create a risk to public health will require retrofit. MTBLW may consider granting an extensions if necessary to replace single detector check valves and to install above grade.

**Schedule for Installation of Backflow Preventer Assemblies**

The schedule for installation of backflow preventers assemblies when deemed necessary based on the hazard evaluation is outlined in the following table:

| Type of Service | Schedule |
|---|---|
| New service connections with cross-connection hazard | Before service is initiated |
| Existing connections with Appendix D-type hazards of CCCPH or other high cross-connection hazards | 60 days after notification |
| Existing connections with other than Appendix D of CCCPH or high cross-connection hazards | 90 days after notification |
| Existing fire protection systems not using chemicals | 10 years after adoption of CCCPH |

MTBLW may consider granting an extension of time for installation of backflow preventor for an existing connection if requested by customer. A written exception must be obtained for MTBLW.

## Certified Backflow Prevention Assembly Testers

MTBLW will review submitted backflow test reports and proof of active Backflow Tester Certification, pursuant to Article 4 of the CCCPH, within 30 days of receipt. MTBLW will provide follow-up on any backflow assemblies or test reports that are found deficient. At the direction of MTBLW's Cross-Connection Control Specialist, MTBLW may require re-test on backflow assemblies previously tested by a backflow tester.

## Backflow Prevention Assembly Testing

### Testing Backflow Assemblies

All backflow assemblies that are in MTBLW service area must be tested at least once a year. MTBLW will assess backflow assemblies for proper application and installation.

The customer is responsible for ensuring each backflow assembly is tested annually. The customer must hire, at their expense, a MTBLW approved certified backflow tester to perform inspection and test. If any backflow assemblies are found to be defective, the customer must repair or replace assembly within 30 days of notification of failure.

If customer fails to comply with this section, water service will be discontinued until customer complies. Discontinued service will be subject to fees as outlined in MTBLW Cross-Connection Control Operating rules.

### Approved Test Procedures

MTBLW will require that all backflow assemblies relied upon to protect the public water system be tested in accordance with approved test procedures as specified in CCCPH Article 3 and on the Manual of Cross-Connection Control, Tenth Edition, published by the University of Southern California Foundation for Cross-Connection Control and Hydraulic Research.

### Notification of Inspection and/or Testing

MTBLW will provide a written notice to all customers with backflow assemblies to have them tested in the following order.

1. First notice to test backflow assembly, 30 days before due date
2. Second notice to test backflow assembly, 30 days after first notice due date
3. Final notice, 5 days after second notice due date

If MTBLW has not received a passing test report within the designated timeframes, enforcement policies will be applied.

### Backflow Assembly Test Reports

Backflow testers must submit the completed test report to MTBLW before the due date specified in the annual testing notice. Completed test reports must be submitted within five (5) calendar days of the test date. Failing test results must be submitted within 24 hours of the test date.

### Failed Backflow Assemblies

Backflow assemblies that fail routine testing shall be repaired or replaced within thirty (30) days of the initial test date. The customer must notify MTBLW if repairs or replacement cannot be made within the specified period. MTBLW will determine the level of risk the failed backflow assembly presents to the water supply and, if necessary, will discontinue water service.

Only Original Equipment Manufacturer (OEM) parts shall be used to repair backflow prevention assemblies. If OEM replacement parts are not available, then an approved backflow prevention assembly must be installed to replace the existing assembly.

**Frequency of Inspection and Testing**

Inspection and testing of backflow preventors will be conducted:

- At the time of installation
- Annually after installation
- After repairs, reinstallation, relocation, or re-plumbing
- After a backflow incident of location

All air gap (AG) separations shall be inspected annually and after modifications to the installation when used as premises containment.

MTBLW may require a backflow preventer to be inspected and/or tested more frequently than once a year when it protects against a high-health hazard or when it repeatedly fails annual test or inspection.

MTBLW will be responsible for inspecting and testing all owned backflow preventers and AG.

**Enforcement**

To enforce MTBLW's Cross-Connection Control Plan and Operating Rules, it may become necessary to discontinue water to service connections that may potentially introduce any harmful liquid, gas, or other substance into the water system.

If MTBLW decides that discontinuation of water service is either too difficult or may pose a health issue, it may have the necessary repairs, replacements, or installations completed by a contractor at the cost of the customer. The customer will be notified in writing specifying the corrective actions that must be taken and time that work must be done. If no action is taken by the customer, then work shall be completed without customer's consent.

## Recordkeeping

MTBLW will maintain records of all backflow preventor assemblies and air gaps. Records will be maintained electronically and/or hard copy. MTBLW will maintain records of the following information required by the CCCPH:

- The two most recent hazard assessments for each user premise
- for each BPA, the associated hazard or application, location, owner, type, manufacturer and model, size, installation date, and serial number
- for each AG installation, the associated hazard or application and the location, owner, and as-built plans of the AG
- results of all BPA field testing, AG inspection, and swivel-ell inspections and field tests for the previous three calendar years, including the name, test date, repair

date, and certification number of the backflow prevention assembly tester for each BPA field test and AG
- repairs made to, or replacement or relocation of, BPAs for the previous three calendar years
- the most current cross-connection tests (e.g. shutdown test, dye test)
- if a User Supervisor is designated for a user premise, the current contact information for the User Supervisor and water user, and any applicable training and qualifications as described by CCCPH section 3.2.2(f)
- descriptions and follow-up actions related to all backflow incidents
- the current Cross-Connection Control Plan as required in CCCPH section 3.1.4.; and
- any public outreach or education materials issued for the previous three calendar years

MTBLW's CCCS will review and sign all cross-connection related reports and assessments required by the CCCPH. All records required by the CCCPH will be available upon request to the State Water Board.

## Backflow Incident Response and Notification

**Backflow Incident Response**

A USEPA white paper on cross-connections found that from available backflow incident reports, "the primary indicator of backflow has been customer complaints of odor, discoloration of the water, or direct physical harm from the contact with the water." Drops in operating pressure, drops in disinfectant residual, or total coliform and heterotrophic plate counts detections are possible indicators of backflow.

MTBLW will implement the following steps:

a. Immediately locate the source of the contamination and notify Essential & Supporting Staff.
b. Isolate that source to protect the water distribution system from further contamination.
c. Determine the extent of the of the spread of the contamination through the distribution system and provide timely, appropriate notification to the public and to the regulatory agencies.
d. Take corrective action to clean the contamination from the distribution system.
e. Restore service to the customers.

Note: Essential & Supporting Staff: CCC Specialist, General Manager, Superintendent, Water Production, Water Distribution, Lab Analysts, and Operations Staff.

**Backflow Incident Notification**

MTBLW shall notify the State Water Resource Board and local health agency of any known or suspected incident of backflow within 24 hours of the determination. If required by the SWRCB, BSMWC will issue a Tier 1 public notification pursuant to CCR, Title 22, Section 64463.1.

If required by the State Water Board, MTBLW shall submit, by a date specified by the State Water Resources Control Board, a written incident report describing the details and affected area of the backflow incident, the actions taken by MTBLW in response to the backflow incident, and the follow up actions to prevent future backflow incidents. The written report must contain, at a minimum, the information requested in Appendix F of the CCCPH (replicated as Exhibit C).

## Public Outreach and Education

MTBLW will educate its staff and customers about backflow and cross-connection control. Education methods shall include literature, the company's website, and other channels. Information will be periodically sent with customers' bills and when new customers sign up for water service.

For residential customers, this information will highlight cross-connection hazards within homes and recommend appropriate devices or assemblies that homeowners should install to mitigate risk to the public water system. The educational program will emphasize the customer's responsibility in preventing contamination of the public water supply.

## Local Entity Coordination

MTBLW shall coordinate with local entities that are involved in matters pertaining cross-connection control or public health protection to ensure hazard assessments can be performed. Local entities may include but are not limited to plumbing, permitting, health officials, law enforcement, fire departments, maintenance, and public and private entities.

# EXHIBIT B

High Hazard Cross-Connection Control Premises List (Appendix D of the CCCPH)

## APPENDIX D

## HIGH HAZARD CROSS-CONNECTION CONTROL PREMISES

The list below identifies premises that require backflow protection provided by an air gap or a reduced pressure principle backflow prevention assembly, unless noted otherwise. The list below is not intended to be all-inclusive. A PWS, State Water Board, or local health agency may require an AG, RP, or both to protect a PWS from other hazards not listed below and identified in premises through the hazard assessment completed in CCCPH Chapter 3, section 3.2.1. A PWS may reduce or increase the minimum protection required for a previously hazard-assessed user premise following a hazard reassessment as described in CCCPH Chapter 3, section 3.2.1.

1. Sewage handling facilities
2. Wastewater lift stations and pumping stations
3. Wastewater treatment processes, handling, or pumping equipment that is interconnected to a piping system connected to a PWS (+)
4. Petroleum processing or storage plants
5. Radioactive material storage, processing plants or nuclear reactors
6. Mortuaries
7. Cemeteries
8. Sites with an auxiliary water supply interconnected with PWS (+)
9. Sites with an auxiliary water supply not interconnected with PWS
10. Premises with more than one connection to the PWS (++++)
11. Recycled water (++)(+++)
12. Recycled water interconnected to piping system that contains water received from a PWS (+)
13. Graywater systems, as defined in California Water Code Section 14876, that are interconnected to a piping system that is connected to a PWS
14. Medical facilities
15. Kidney dialysis facilities
16. Dental office with water-connected equipment
17. Veterinarian facilities
18. Chemical plants
19. Laboratories
20. Biotech facilities
21. Electronics manufacture
22. Dry cleaner facilities
23. Industrial or commercial laundry facilities
24. Metal-plating facilities
25. Business park with a single meter serving multiple businesses
26. Marine-port facilities
27. Car wash facilities

28. Mobile home park, RV park, or campgrounds with RV hookups
29. Hotels/motels
30. Gas stations
31. Fire stations
32. Solid waste disposal facilities
33. Pet groomers
34. Agricultural premises
35. Hazard assessment access denied or restricted
36. Railroad maintenance facilities
37. Incarceration facilities (e.g. prisons)
38. Temporary connections to fire hydrants for miscellaneous uses, including construction
39. Private water distribution mains
40. Drinking water storage tank overflow connected to a sump or storm drain (+)
41. Airports

(+) Premise isolated by air gap only except as allowed through CCCPH Section 3.2.2(c)

(++) Dual-plumbed use areas established per CCR Title 22, Section 60313 through 60316.

(+++) Residences using recycled water for landscape irrigation as part of an approved dual plumbed use area established pursuant to CCR Title 22, sections 60313 through 60316 shall use, at a minimum, a DC. If the water supplier is also the supplier of the recycled water, then the recycled water supplier may obtain approval of the local public water supplier or the State Water Board, to utilize an alternative backflow protection plan that includes an annual inspection of both the recycled water and potable water systems and an annual cross-connection test of the recycled water and potable water systems pursuant to subsection 60316(a) in lieu of any BPA.

(++++) All connections must receive at least the same level of protection excluding fire protection when connected to the PWS distribution system (e.g. if one connection requires an RP then all connections must have RPs installed).

# EXHIBIT C

SWRCB Backflow Incident Report Form

**Montbello Land and Water Company**
**BACKFLOW INCIDENT REPORT FORM**

Water System: _____

Water System Number: _____

Incident Date: _____

Incident Time (if known):_____

Incident Location: _____

How was the incident discovered?

_____

Backflow Originated from:

Premise Location: _____

Address: _____

Premise Contact Person: _____Title:_____
Phone:_____Email: _____

Connection Type: (please check one)

o Industrial o Commercial o Single-Family Residential o Multi-Family Residential

o Irrigation o Recycled Water o Water System Facility

o Other: _____

Description and source of backflow fluid (please be as descriptive as possible):

_____

_____

If available, please attach an MSDS or other chemical description

form. Was the backflow fluid contained within the user side? YES o NO

Estimated Number of Affected Persons: _____

Number and description of consumer complaints received:

_____

_____

Did any consumers report illness? Please describe.

_____

_____

If applicable, please describe the consumer notification:

_____

_____

## INVESTIGATION

Please describe the water system investigation including time frames:

_____

_____

_____

_____

_____

_____

What was the area system pressure? _____

Is this within typical range: YES o NO - typical pressure: _____

Was a sample of the water contaminated by the backflow incident collected and stored before flushing? YES o NO

Please describe all sampling:

_____

_____

_____

DDW recommends laboratory or field sampling for the following parameters: total coliform, E. coli, free and total chlorine residual, pH, odor, turbidity, temperature, and color. Additional sampling should be collected at the PWS and regulatory agency's discretion.

## CORRECTIVE ACTIONS

Please describe the corrective actions taken by the water system:

_____

_____

Was the chlorine residual increased after the backflow incident discovery? YES o NO

Date of the last cross-connection control hazard assessment of the premise with the backflow incident conducted: _____

Did the premise have backflow prevention assemblies? YES o NO

Date of most recent backflow prevention assembly test(s): _____

When was the Division of Drinking Water or Local County Health office notified?

Date: _____Time: _____Contact Person: _____

Was the Division or Local County Health notified within 24 hours? YES o NO

Other agencies or organizations contacted? YES o NO

If yes, who?

_____

_____

**CERTIFICATION**

Name: _____Job Title: _____
Certification(s): _____

_____

Please list all cross-connection control related certifications including number and expiration date:

I certify that the forgoing information is true and correct to the best of my ability.

Signature: _____Date: _____

Attach the following applicable documentation

1. Laboratory Test Results
2. Sketch of the cross-connection and modifications
3. MSDS or chemical information forms if chemical hazard is known
4. Applicable backflow assembly test reports including the most recent test before the incident
5. Other relevant supporting documentation