# CROSS-CONNECTION CONTROL PLAN
# (PROGRAM IMPLEMENTATION DOCUMENT)

## Iowa Tribe of Kansas and Nebraska Tribal Water Utility

**Prepared for compliance with the Safe Drinking Water Act**
**(42 U.S.C. § 300f, et seq.)**

**Oversight: U.S. Environmental Protection Agency Region 7**

**Effective Date:** April 15, 2026

**Public Water System ID:** 070000008

## PROGRAM STATUS AND IMPLEMENTATION

The Iowa Tribe of Kansas and Nebraska Tribal Water Utility is in the process of developing and implementing a Cross-Connection Control Program.

This document serves as both:

(1) The Tribe's Cross-Connection Control Plan submitted to the U.S. Environmental Protection Agency Region 7; and
(2) The operational framework for implementation of the Cross-Connection Control Program.

The Tribal Water Utility will implement the Program in phases, including:

(1) Establishment of a device inventory.
(2) Initiation of inspection activities.
(3) Implementation of testing requirements.
(4) Development of enforcement procedures.

Full implementation will occur as resources allow and as the system is developed.

## IMPLEMENTATION APPROACH

The Tribal Water Utility will implement the Cross-Connection Control Program in a phased manner based on available resources and system needs.

Implementation is anticipated to occur generally as follows:

### (1) Initial Phase

Development of an inventory framework, use of Program forms included in the appendices, adoption of this Plan, and identification of high hazard service connections.

### (2) Implementation Phase

Initiation of inspections, establishment of testing requirements, and documentation of backflow prevention assemblies.

### (3) Ongoing Phase

Continued inspections, testing, enforcement, and program refinement.

The Tribal Water Utility will prioritize high hazard conditions and address other service connections over time.

(continued next page)

# CROSS-CONNECTION CONTROL PLAN
# (PROGRAM IMPLEMENTATION DOCUMENT)

## SECTION 1.0 – PURPOSE

### 1.1 General

The purpose of this Cross-Connection Control Program ("Program") is to protect the potable water distribution system operated by the Iowa Tribe of Kansas and Nebraska Tribal Water Utility from contamination or pollution due to backflow through cross-connections.

### 1.2 Objectives

The Program shall:

(1) Identify all actual and potential cross-connections and eliminate such cross-connections or require installation of approved backflow prevention assemblies commensurate with the degree of hazard.
(2) Require installation of appropriate backflow prevention assemblies.
(3) Ensure proper testing, maintenance, and operation of backflow prevention devices.
(4) Establish enforceable requirements applicable to all customers served by the water system.
(5) Protect public health and maintain compliance with applicable federal drinking water requirements.

## SECTION 2.0 – LEGAL AUTHORITY

### 2.1 Federal Authority

This Program is implemented consistent with:

(1) Safe Drinking Water Act, 42 U.S.C. § 300f et seq.
(2) 40 C.F.R. Part 141, National Primary Drinking Water Regulations
(3) 40 C.F.R. Part 142, Public Water System Supervision

### 2.2 Tribal Authority

The Iowa Tribe of Kansas and Nebraska Tribal Water Utility ("Tribal Water Utility") shall have authority, as a condition of providing water service, to:

(1) Enter and inspect any premises served by the Tribe's water system.
(2) Require installation of backflow prevention assemblies.
(3) Require periodic testing, maintenance, and replacement of devices.
(4) Deny or discontinue water service where a cross-connection hazard exists.

## SECTION 3.0 – APPLICABILITY

This Program shall apply to all service connections supplied by the Tribal Water Utility, including residential, commercial, industrial, governmental, and irrigation systems.

No service connection shall be installed or maintained where a cross-connection exists unless protected by an approved backflow prevention method.

## SECTION 4.0 – DEFINITIONS

For purposes of this Program:

**Backflow** shall mean the reversal of water flow into the potable water system.

**Backpressure** shall mean a condition in which downstream pressure exceeds system pressure.

**Backsiphonage** shall mean backflow caused by negative pressure within the distribution system.

**Cross-connection** shall mean any physical connection between a potable water system and a non-potable water system.

**Air gap** shall mean a physical vertical separation between a potable outlet and a receiving vessel.

**Reduced Pressure Principle Assembly** ("**RPZ**") shall mean a backflow prevention assembly designed to prevent backflow due to backpressure or backsiphonage.

**Double Check Valve** Assembly ("**DCVA**") shall mean an assembly used to prevent backflow in low hazard conditions.

**Pressure Vacuum Breaker** ("**PVB**") shall mean a device used to prevent backsiphonage.

**Atmospheric Vacuum Breaker** ("**AVB**") shall mean a device used to prevent backsiphonage under limited conditions.

## SECTION 5.0 – PROGRAM ADMINISTRATION

### 5.1 Program Administrator

The Tribal Water Utility shall designate a Cross-Connection Control Program Administrator. The Program Administrator shall oversee phased implementation of the Cross-Connection Control Program consistent with this Plan.

### 5.2 Duties

The Program Administrator shall:

(1) Maintain an inventory of all backflow prevention assemblies.
(2) Schedule and conduct inspections of service connections.
(3) Review and approve backflow prevention test reports.
(4) Issue notices of violation and enforce compliance.
(5) Maintain records required under this Program.
(6) Coordinate with U.S. Environmental Protection Agency Region 7 as necessary.

## SECTION 6.0 – CUSTOMER RESPONSIBILITIES

Customers receiving water service shall:

(1) Eliminate all cross-connections within their premises.
(2) Install required backflow prevention assemblies.
(3) Permit inspection of plumbing systems by the Tribal Water Utility.
(4) Ensure annual testing of backflow prevention assemblies.
(5) Maintain all devices in proper working condition.

Failure to comply shall constitute a violation of service conditions.

## SECTION 7.0 – HAZARD CLASSIFICATION

### 7.1 General

All service connections shall be classified based on degree of hazard.

### 7.2 High Hazard

A high hazard exists where contamination may pose a risk to public health.

Examples include chemical systems, wastewater systems, irrigation with injection, and medical facilities.

Protection required: Air gap or RPZ.

### 7.3 Moderate Hazard

Moderate hazard conditions include commercial plumbing systems and fire protection systems without additives.

Protection required: RPZ or DCVA.

### 7.4 Low Hazard

Low hazard conditions include residential connections and irrigation systems without chemical injection.
Protection required: PVB, AVB, or hose vacuum breaker.

## SECTION 8.0 – PREMISES INSPECTION PROGRAM

### 8.1 General

The Tribal Water Utility shall conduct inspections to identify cross-connections and verify compliance. Inspections shall be documented using the form in **Appendix A**.

### 8.2 Inspection Procedure

Each inspection shall include:

(1) Identification of facility type and use.
(2) Evaluation of potential cross-connections.
(3) Classification of hazard level.
(4) Verification of required backflow prevention assemblies.
(5) Documentation of findings.

### 8.3 Inspection Frequency

| Facility Type | Frequency |
|---|---|
| High hazard | Annually |
| Commercial | Every 3–5 years |
| Residential | As needed |

### 8.4 Reinspection

Where violations are identified, reinspection shall occur within a reasonable timeframe not to exceed sixty (60) days.

## SECTION 9.0 – DEVICE SELECTION

Backflow prevention assemblies shall be selected based on hazard classification as follows:

| Hazard Level | Required Protection |
|---|---|
| High hazard | Air gap or RPZ |
| Moderate hazard | RPZ or DCVA |
| Low hazard | PVB, AVB, or equivalent |

## SECTION 10.0 – INSTALLATION REQUIREMENTS

Backflow prevention assemblies shall:

(1) Be installed at the service connection or hazard location.
(2) Be accessible for inspection and testing.

(3) Be protected from freezing and flooding.
(4) Be installed in accordance with manufacturer specifications.
(5) Conform to recognized industry standards.

## SECTION 11.0 – TESTING REQUIREMENTS

### 11.1 Frequency

Testable assemblies shall be tested:

(1) Upon installation.
(2) At least annually thereafter.
(3) Following repair or relocation.

### 11.2 Failure Response

Where a device fails:

(1) The device shall be immediately repaired.
(2) Retesting shall occur within ten (10) days.
(3) Failure to correct shall result in enforcement action.

### 11.3 Reporting

All test results shall be submitted to the Tribal Water Utility. Test reports shall include the tester's certification number and expiration date.

Testing shall be documented using the report in **Appendix B**.

## SECTION 12.0 TESTER CERTIFICATION

### 12.1 General

All testing of backflow prevention assemblies shall be performed by individuals holding a valid backflow prevention assembly tester certification through recognized programs acceptable to the Tribal Water Utility.

### 12.2 Acceptable Certification

Certification shall be obtained through a recognized program, including but not limited to:

(1) Programs administered by state or local governmental agencies.
(2) Programs based on standards of the American Water Works Association.

The Tribal Water Utility may accept equivalent certifications as determined appropriate.

### 12.3 Verification

The Tribal Water Utility shall verify that individuals performing testing hold a current certification at the time of testing.

## SECTION 13.0 RECORD KEEPING AND REPORTING

### 13.1 General

The Tribal Water Utility shall establish and maintain a comprehensive recordkeeping system sufficient to document implementation of this Program and demonstrate compliance with applicable requirements under the Safe Drinking Water Act and oversight by the U.S. Environmental Protection Agency.

All records shall be complete, accurate, and available for inspection upon request.

### 13.2 Required Records

The Tribal Water Utility shall maintain, at a minimum, the following records:

(1) An inventory of all backflow prevention assemblies, including location, device type, manufacturer, model, and serial number.

(2) All field test reports for backflow prevention assemblies, including initial tests, annual tests, and post-repair tests.

(3) Initial cross-connection risk assessments and any subsequent reassessments conducted during inspections.

(4) Records of periodic surveys of service connections, including verification of proper installation and hazard classification.

(5) Testing history for each device, including test dates and pass/fail results.

(6) Records of all repairs, replacements, and retesting of backflow prevention assemblies.

(7) Identification of the individual or contractor performing each test, including certification number and affiliation.

(8) Copies of all correspondence related to cross-connection control, including notices of violation, compliance communications, and enforcement actions.

### 13.3 Record Format and Management

Records shall be maintained in either electronic or hard-copy format, provided that:

(1) Records are organized and readily retrievable.

(2) Records are protected from loss, damage, or unauthorized alteration.

(3) The system allows tracking of compliance status for each service connection.

### 13.4 Retention Period

All records required under this Program shall be retained for a minimum of five (5) years. Records related to enforcement actions or unresolved violations shall be retained until the matter is fully resolved, regardless of the five-year period.

### 13.5 Availability

The records shall be made available to the U.S. Environmental Protection Agency Region 7 upon request, including during sanitary surveys or compliance inspections.

### 13.6 Reporting

The Tribal Water Utility shall retain sufficient documentation to demonstrate:

(1) Completion of required inspections.

(2) Compliance with annual testing requirements.

(3) Timely correction of identified violations.

(4) Ongoing operation of the Cross-Connection Control Program.

## SECTION 14 – INVENTORY MANAGEMENT

### 14.1 General

The Tribal Water Utility shall establish and maintain a comprehensive inventory of all backflow prevention assemblies installed within the Tribe's public water system. The inventory shall be used as the primary tool for tracking compliance with inspection, testing, and maintenance requirements under this Program.

This inventory shall be maintained in a format consistent with **Appendix C**.

### 14.2 Required Information

The inventory shall include the following information for each backflow prevention assembly:

(1) Service location or facility name and address.

(2) Device type (e.g., RPZ, DCVA, PVB, AVB).

(3) Manufacturer, model number, and serial number.

(4) Installation date.

(5) Hazard classification associated with the service connection.

(6) Date of last inspection.

(7) Date of last test and test result.

(8) Date of next required test.

(9) Records of repairs, replacements, and retesting.

(10) Compliance status (compliant, overdue, or non-compliant).

### 14.3 Maintenance and Updates

The inventory shall be updated:

(1) Upon installation of any new backflow prevention assembly.

(2) Upon completion of inspections or testing.

(3) Following any repair, replacement, or removal of a device.

### 14.4 Compliance Tracking

The inventory system shall be used to:

(1) Identify devices due for testing or inspection.

(2) Track overdue testing or maintenance.

(3) Support enforcement actions under Section 15.0.

The inventory shall serve as the primary compliance management tool for identifying non-compliant service connections.

## SECTION 15 – ENFORCEMENT

### 15.1 General

The Tribal Water Utility shall enforce the requirements of this Program to ensure protection of the Tribe's public water system from contamination due to cross-connections.

Enforcement actions shall be based on documented non-compliance identified through inspections, testing records, or inventory tracking as described in Sections 8.0, 11.0, 13.0 and 14.0.

### 15.2 Conditions Requiring Enforcement

Enforcement action may be initiated where any of the following conditions exist:

(1) Failure to install a required backflow prevention assembly.

(2) Failure to test a backflow prevention assembly as required.

(3) Failure of a backflow prevention assembly that is not repaired or replaced.

(4) Denial of access for inspection.

(5) Removal, bypass, or tampering with a required backflow prevention assembly.

(6) Any condition determined to present a cross-connection hazard.

**15.3 Progressive Enforcement Steps**

(1) **Notice of Violation.**

The Tribal Water Utility shall issue written notice describing the violation, required corrective action, and deadline for compliance.

Notices of violation may be issued using the form in **Appendix D**.

(2) **Second Notice.**

If the violation is not corrected within the specified timeframe, a second notice shall be issued providing an additional compliance period.

(3) **Final Notice.**

If the violation remains uncorrected, a final notice shall be issued stating that water service will be terminated if corrective action is not completed within the specified timeframe.

(4) **Termination of Service.**

Water service may be discontinued until compliance is achieved.

**15.4 Timeframes**

Unless otherwise specified by the Tribal Water Utility:

(1) Initial compliance period shall not exceed thirty (30) days.

(2) Follow-up notices shall provide reasonable time for correction based on the nature of the violations.

(3) Shorter timeframes may be imposed where necessary to protect public health.

**15.5 Emergency Action**

The Tribal Water Utility may immediately terminate water service without prior notice where an imminent threat to the Tribe's public water system exists, including but not limited to a:

(1) Confirmed backflow incident.

(2) High hazard cross-connection without protection.

(3) Failure of a required RPZ or equivalent device posing a health risk.

**15.6 Restoration of Service**

Unless otherwise provided by the Tribal Water Utility, water shall not be restored until:

(1) The violation has been corrected.

(2) Required backflow prevention assemblies are installed or repaired.

(3) The assembly has been tested and has passed inspection.

(4) The Tribal Water Utility has verified compliance.

### 15.7 Documentation

All enforcement actions shall be documented and maintained in accordance with Section 13.0 (Recordkeeping and Reporting).

## SECTION 16.0 – INCIDENT RESPONSE

### 16.1 General

The Tribal Water Utility shall respond to any known or suspected cross-connection contamination event in order to protect the public water system and public health.

For purposes of this section, a cross-connection contamination event includes any condition in which backflow may have introduced contaminants into the potable water system.

### 16.2 Response Actions

Upon identification of a cross-connection contamination event, the Tribal Water Utility shall:

(1) Isolate the affected portion of the distribution system to prevent further contamination.

(2) Identify and eliminate the cross-connection or source of backflow.

(3) Flush affected portions of the system as necessary to remove contaminants.

(4) Conduct appropriate water quality sampling, as determined by the system operator, to verify system integrity.

(5) Notify appropriate internal personnel responsible for system operation and compliance.

(6) Notify the U.S. Environmental Protection Agency Region 7 where required based on the nature and severity of the event.

### 16.3 Documentation

The Tribal Water Utility shall document all cross-contamination events, including:

(1) Date and location of the event.

(2) Description of the condition or cause.

(3) Corrective actions taken.

(4) Sampling conducted and results, if applicable.

Documentation shall be maintained in accordance with Section 13.0 and, where applicable, entered into the inventory system described in Section 14.0.

### 16.4 Restoration of Normal Operations

Normal system operations shall resume once:

(1) The cross-connection has been eliminated or controlled.

(2) Flushing and corrective actions have been completed.

(3) Sampling results, where conducted, indicate the system is safe for normal use.

## SECTION 17.0 PUBLIC EDUCATION

### 17.1 General

The Tribal Water Utility shall provide public education regarding cross-connection hazards and backflow prevention in order to reduce the risk of contamination to the public water system.

### 17.2 Educational Topics

Educational materials shall address, at a minimum:

(1) Hazards associated with hose connections and backsiphonage.

(2) Risks associated with irrigation systems, including potential chemical injection.

(3) The purpose and importance of backflow prevention assemblies.

### 17.3 Delivery Methods

Public education may be provided through one or more of the following methods:

(1) Distribution of written materials to customers.

(2) Posting of information on utility notices or billing inserts.

(3) Direct communication with customers during inspections or enforcement actions.

### 17.4 Targeted Education

The Tribal Water Utility shall provide targeted education to customers identified as having cross-connection hazards or required backflow prevention assemblies, including during inspections and enforcement actions.

### 17.5 Documentation

The Tribal Water Utility shall maintain records of public education activities in accordance with Section 13.0, including general outreach efforts and targeted communications where applicable.

## SECTION 18.0 – TRAINING

### 18.1 General

The Tribal Water Utility shall ensure that personnel responsible for implementing this Program are adequately trained to perform their assigned duties.

### 18.2 Training Scope

Personnel involved in the Cross-Connection Control Program shall be trained, as appropriate, in their role, in the following areas:

(1) Identification of cross-connections and potential hazards.

(2) Hazard classification in accordance with Section 7.0.

(3) Inspection procedures described in Section 8.0.

(4) Backflow prevention device requirements and general operation.

(5) Enforcement procedures described in Section 15.0.

Training shall be sufficient to enable personnel to implement the requirements of this Program in a consistent and effective manner.

Where required by this Program, certain activities, including backflow prevention assembly testing, shall be performed by appropriately certified individuals.

### 18.3 Method of Training

Training may be provided through on-the-job instruction, review of this Program manual, or other appropriate means as determined by the Tribal Water Utility.

### 18.4 Responsibility

The Cross-Connection Control Program Administrator shall ensure that personnel performing inspections, recordkeeping, or enforcement activities have received appropriate training.

### 18.5 Documentation

The Tribal Water Utility shall maintain records of training activities in accordance with Section 13.0. Documentation may include dates of training, topics covered, and personnel trained.

## SECTION 19.0 – ANNUAL PROGRAM REVIEW

### 19.1 General

The Tribal Water Utility shall conduct an annual review of the Cross-Connection Control Program to evaluate implementation and effectiveness.

### 19.2 Scope of Review

The annual review shall include, at a minimum:

(1) Completion of required inspections in accordance with Section 8.0.

(2) Compliance with backflow prevention assembly testing requirements under Section 11.0.

(3) Accuracy and completeness of the inventory described in Section 14.0.

(4) Documentation and resolution of enforcement actions under Section 15.0.

### 19.3 Responsibility

The Cross-Connection Control Program Administrator shall be responsible for conducting the annual review.

### 19.4 Documentation

The results of the annual review shall be documented and maintained in accordance with Section 13.0.

### 19.5 Corrective Action

Where deficiencies are identified, the Tribal Water Utility shall take reasonable corrective actions to address gaps in Program implementation.

## APPENDICES:

**Appendix A – Cross-Connection Survey Form**

**Appendix B – Backflow Prevention Test Report**

**Appendix C – Backflow Device Inventory Template**

**Appendix D – Notice of Violation**

**APPENDIX A**
**CROSS-CONNECTION SURVEY**

**INSTRUCTIONS FOR USE**

## 1. Purpose

The Cross-Connection Survey Form is used to:
(1) Identify actual or potential cross-connections at a service location.
(2) Determine the appropriate hazard classification.
(3) Document the presence and condition of backflow prevention assemblies.
(4) Record any deficiencies and required corrective actions.

## 2. When to Use This Form

This form shall be completed:
(1) During initial inspections of service connections.
(2) During follow-up inspections where violations were identified.
(3) When investigating potential cross-connection concerns.

## 3. How to Complete the Form

### A. Facility Information

Enter:

- Facility name and address
- Contact name and phone number (if available)
- Date of inspection
- Inspector name

### B. Facility Type

Check the box that best describes the use of the property:

- Residential
- Commercial
- Industrial
- Government
- Other

### C. Hazard Classification

Assign a hazard level based on observed conditions:

- Low — typical residential use, no contamination risk
- Moderate — commercial systems or limited risk
- High — presence of chemicals, irrigation injection, or health hazards

Then provide a brief explanation for the classification.

### D. Cross-Connections Identified

For each potential or actual cross-connection:

- Describe the location (e.g., “irrigation system,” “boiler line”)
- Describe the condition
- Assign hazard level
- Note whether protection is present

**E. Backflow Prevention Assemblies**

Record all observed devices:

- Device type (RPZ, DCVA, PVB, etc.)
- Location
- Manufacturer (if visible)
- Model and serial number (if available)

**F. Compliance Determination**

Check:

- Compliant — appropriate protection installed and no deficiencies
- Non-Compliant — missing device, failed device, or other hazard

**G. Deficiencies and Corrective Actions**

Clearly describe:

- What is wrong
- What must be done to correct it

Example: “Install RPZ on irrigation system connection.”

**H. Compliance Deadline**

Enter a reasonable deadline based on the issue:

- Routine issues → up to 30 days
- Higher risk issues → shorter timeframe

**I. Signature**

Inspector signs and dates the form.

**4. After the Inspection**

The completed form shall be:

(1) Submitted to the Program Administrator.
(2) Entered into the inventory and recordkeeping system (Sections 13.0 and 14.0).
(3) Used to initiate enforcement if deficiencies are identified (Section 15.0).

**APPENDIX A**
**CROSS-CONNECTION SURVEY FORM**

**Water System: Iowa Tribe of Kansas and Nebraska Tribal Water Utility**

**PWS ID: 070000008**

**Facility Name:** _____

**Address:** _____

**Contact Name:** _____

**Phone:** _____

**Date of Inspection:** _____

**Inspector:** _____

****

**Facility Type**

Residential ☐ Commercial ☐ Industrial ☐ Government ☐ Other ☐

**Hazard Classification**

Low ☐ Moderate ☐ High ☐

**Basis for Classification:** _____

_____

_____

**Cross-Connections Identified:**

Location:

Description:

Hazard Level:

Protection Present:

**Backflow Prevention Assemblies Observed:**

Device Type:

Location:

Manufacturer:

Model:

Serial Number:

**Compliance Status:**

Compliant ☐ Non-Compliant ☐

Deficiencies Identified:

**Corrective Action Required:**

Yes ☐ No ☐

Describe: _____

_____

_____

**Compliance Deadline:** _____

**Inspector Signature:** _____ **Date:** _____

**APPENDIX B**
**BACKFLOW PREVENTION TEST REPORT**

**INSTRUCTIONS FOR USE**

1. **Purpose:**
   The Backflow Prevention Test Report is used to document the testing of backflow prevention assemblies to ensure they are functioning properly and protecting the potable water system. This form provides verification that required testing has been completed in accordance with Sections 11-12.

2. **When to Use This Form**
   This form shall be completed:
   (1) At the time of installation of a testable backflow prevention assembly.
   (2) During required annual testing.
   (3) After any repair, replacement, or relocation of a device.

3. **Who May Complete This Form**
   This form shall be completed only by an individual holding a valid backflow prevention assembly tester certificate. The tester is responsible for ensuring that all information is accurate and complete at the time of testing.

4. **After Completion**
   The completed test report shall be:
   (1) Submitted to the Tribal Water Utility.
   (2) Reviewed by the Program Administrator for completeness.
   (3) Entered into the inventory and recordkeeping system (Sections 13.0-14.0).

5. **Relationship to Compliance**
   This form is used to:
   (1) Verify compliance with testing requirements.
   (2) Support enforcement actions if testing is not completed.
   (3) Track device performance over time.

   Failure to submit a complete and accurate test report may result in enforcement action under Section 15.0.

**APPENDIX B**
**BACKFLOW PREVENTION TEST REPORT FORM**

**Water System: Iowa Tribe of Kansas and Nebraska Tribal Water Utility**

**PWS ID: 070000008**

**Facility Name:** _____

**Address:** _____

**Device Location:** _____

**Contact Name:** _____

**Phone:** _____

**Test Date:** _____

**Tester:** _____

****

**Device Information: (Provide)**

Device Type: RPZ ☐ DCVA ☐ PVB ☐ AVB ☐

Manufacturer: _____

Model Number: _____

Serial Number: _____

Size: _____

**Test Information: (Provide)**

Test Date: _____

Tester Name: _____

Certification Number: _____

Certification Expiration Date: _____

(next page)

**Test Results:**

| Component | Pass | Fail |
|---|---|---|
| Check Valve #1 | ☐ | ☐ |
| Check Valve #2 | ☐ | ☐ |
| Relief Valve (if applicable) | ☐ | ☐ |

Overall Result: Pass ☐ Fail ☐

Repairs Made (if any):

Describe: _____ _____

_____

_____

**Retest Date** (if required): _____

**Tester Signature:** _____ **Date:** _____

**APPENDIX C**
**BACKFLOW DEVICE INVENTORY**

**INSTRUCTIONS FOR USE**

1. **Purpose**
   The Backflow Device Inventory Template is used to maintain a current and complete record of all backflow prevention assemblies within the Iowa Tribe of Kansas and Nebraska Tribal Water Utility system.

   The inventory serves as the primary tool for tracking compliance with inspection, testing, maintenance, and enforcement requirements under the Cross-Connection Control Program.

2. **When to Use This Inventory**
   The inventory shall be used:
   (1) Upon installation of any new backflow prevention assembly.
   (2) When updating records following inspections or testing.
   (3) When tracking compliance status of service connections.
   (4) During program review and reporting activities.

3. **Who Maintains the Inventory**
   The Cross-Connection Control Program Administrator is responsible for maintaining and updating inventory.

   Updates may be made by designated personnel, but the Program Administrator is responsible for accuracy and completeness. Therefore, updated uses, order, and commitments of inventory must be timely reported to the Program Administrator for appropriate record keeping purposes.

4. **How to Complete the Inventory**
   Each row in the inventory represents one backflow prevention assembly.

   Complete the following fields:
   (1) Facility Name: enter the name of the property or customer associated with the device.
   (2) Address: enter the service address where the device is located.
   (3) Device Type: enter the type of device.
   (4) Serial Number: enter the device serial number. If not available, note as “unknown”.
   (5) Install Date: enter the date the device was installed, if known.
   (6) Last Test Date: enter the date of the most recent test.
   (7) Next Test Date: enter the date the next test is required.

Compliance Status – indicate accordingly.

- Compliant — device is tested and functioning within required timeframe.
- Overdue — testing or inspection is past due.
- Non-Compliant — device has failed testing or a violation exists.

**5. Updating the Inventory**

The inventory shall be updated:

(1) When a new device is installed.
(2) After each inspection or test.
(3) After any repair, replacement, or removal of a device.

Information should be entered promptly to ensure accuracy.

**6. Use of the Inventory**

The inventory shall be used to:

(1) Identify devices due for testing or inspection.
(2) Track overdue or non-compliant devices.
(3) Support enforcement actions under Section 15.0.
(4) Demonstrate compliance with the Cross-Connection Control Program.

**7. Relationship to Compliance**

The inventory is the central tracking system for the Cross-Connection Control Program.

Accurate and up-to-date inventory records are essential for:

- Ensuring required testing is completed.
- Identifying non-compliant service connections.
- Supporting enforcement and program review.

Failure to maintain an accurate inventory may result in compliance issues during regulatory review.

**APPENDIX C**
**BACKFLOW DEVICE INVENTORY**

**FORM**

| Facility Name | Address | Device Type | Serial Number | Install Date | Last Test Date | Next Test Due | Compliance Status |
|---|---|---|---|---|---|---|---|
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**Compliance Status Definitions**

Compliant: Device tested and functioning within required timeframe
Overdue: Testing or inspection past due
Non-Compliant: Failed device or violation not corrected

**APPENDIX D**
**NOTICE OF VIOLATION**

**INSTRUCTIONS FOR USE**

1. **Purpose**
   The Notice of Violation form is used to notify a customer of non-compliance with the Cross-Connection Control Plan and Program.

   It documents the violation, specifies required corrective actions, and establishes a deadline for compliance. This form supports enforcement actions under Section 15.0.

2. **When to Use This Form**
   This form is issued when any of the following conditions are identified:
   (1) Failure to install a required backflow prevention assembly.
   (2) Failure to test a device as required.
   (3) Failure of a backflow prevention assembly.
   (4) Denial of access for inspection.
   (5) Removal, bypass, or tampering with a required device.
   (6) Any condition determined to present a cross-connection hazard.

3. **Who Issues the Notice**
   The Notice of Violation shall be issued by the Tribal Water Utility or the Cross-Connection Control Program Administrator.

4. **How to Complete the Form**
   A. **Customer Information** – enter
      - Date of notice
      - Customer name
      - Service address

   B. **Description of Violations –** clearly describe the violation, including
      - What condition was observed
      - Where the issue is located
      - Why it is non-compliant

      Use clear, factual language.

   C. **Required Corrective Actions** – state exactly what the customer must do to correct the violation.

      Examples

- Install RPZ on irrigation system connection.
- Repair or replace failed backflow prevention assembly.
- Provide access for inspection.

D. **Compliance Deadline**
Enter a reasonable deadline for correction:
- Routine issues – up to 30 days
- Higher risk issues – shorter timeframe

Deadlines should reflect the severity of the hazard.

E. **Signature**
The issuing representative shall sign the form.

**5. Delivery of Notice**
The Notice of Violation may be delivered by:
- Hand delivery
- Mail
- Other appropriate method as determined by the Tribal Water Utility

**6. After Issuance**
Following issuance of the notice:
(1) The notice shall be documented and retained in accordance with Section 13.0.
(2) The violation shall be tracked in the inventory system pursuant to Section 14.0.
(3) Follow-up shall occur to verify compliance.

**APPENDIX D**
**NOTICE OF VIOLATION**

**FORM**

**Water System: Iowa Tribe of Kansas and Nebraska Tribal Water Utility**

**Date: _____**

**Customer Name: _____**

**Service Address: _____**

**Description of Violation**

_____

_____

_____

_____

**Required Corrective Action**

_____

_____

_____

_____

**Compliance Deadline**

_____

_____

**Failure to correct this violation may result in enforcement action, including termination of water service in accordance with Section 15.0 of the Cross-Connection Control Plan and Program. Contact the Iowa Tribe of Kansas and Nebraska Tribal Water Utility with any questions. Telephone: 785-595-3258. Email:** tony.fee@iowas.org .