Cross Connection: Authority Having Jurisdiction Agreements, What to Know

Tom Bagley – Northshore Utility District

Background

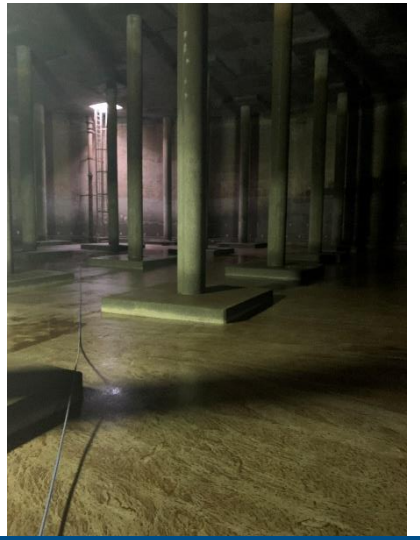












Agenda

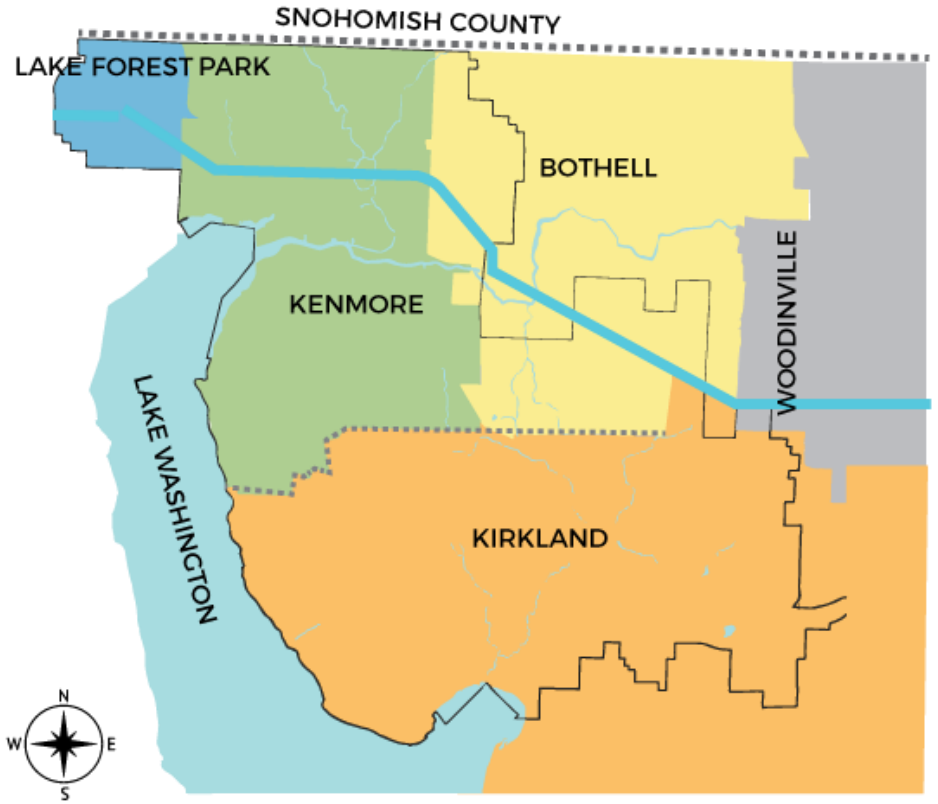
- What are Authority Having Jurisdiction agreements (AHJ)
  - Advantages of agreements
  - Obstacles in agreements
- Elements to consider in an AHJ agreement
- The process of developing and finalizing an agreement

Note: AHJ and local administrative authority (LAA) and Utility and Water Purveyor are interchangeable



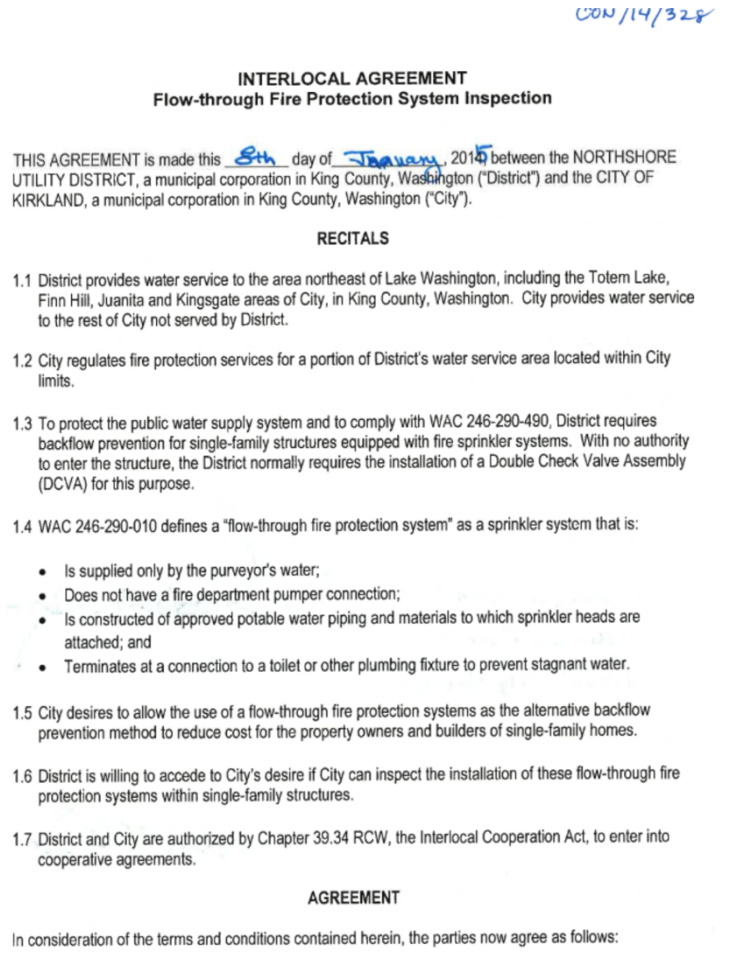
What is AHJ Agreement

- **AHJ Agreement (Interagency Coordination)**
- Required coordination between water purveyors and Authorities Having Jurisdiction (AHJs) under WAC 246-290-490 and WAC 51-46
- Defines how agencies share responsibility for public health protection (e.g., cross-connection control, plan review, enforcement)
- **Levels of Coordination**
- Basic information sharing → Coordinated review → Joint programs
- **Implementation Tools**
- Internal: SOPs, SOGs, interdepartmental approvals
- External: MOUs/MOAs, adopted policies/resolutions/code, governing body approval



What are the Advantages of Having AJH?

- Communication Between Agencies
- Recognizing Roles & Authority
- Information Exchange
- Staff Turnover Resilience
- Relationship Building & Breaking Down Silos
- Better Protection for Public Health



CON/14/328

INTERLOCAL AGREEMENT
Flow-through Fire Protection System Inspection

THIS AGREEMENT is made this 8th day of January, 2015 between the NORTHSHORE UTILITY DISTRICT, a municipal corporation in King County, Washington ("District") and the CITY OF KIRKLAND, a municipal corporation in King County, Washington ("City").

RECITALS

1.1 District provides water service to the area northeast of Lake Washington, including the Totem Lake, Finn Hill, Juanita and Kingsgate areas of City, in King County, Washington. City provides water service to the rest of City not served by District.

1.2 City regulates fire protection services for a portion of District's water service area located within City limits.

1.3 To protect the public water supply system and to comply with WAC 246-290-490, District requires backflow prevention for single-family structures equipped with fire sprinkler systems. With no authority to enter the structure, the District normally requires the installation of a Double Check Valve Assembly (DCVA) for this purpose.

1.4 WAC 246-290-010 defines a "flow-through fire protection system" as a sprinkler system that is:

- Is supplied only by the purveyor's water;
- Does not have a fire department pumper connection;
- Is constructed of approved potable water piping and materials to which sprinkler heads are attached; and
- Terminates at a connection to a toilet or other plumbing fixture to prevent stagnant water.

1.5 City desires to allow the use of a flow-through fire protection systems as the alternative backflow prevention method to reduce cost for the property owners and builders of single-family homes.

1.6 District is willing to accede to City's desire if City can inspect the installation of these flow-through fire protection systems within single-family structures.

1.7 District and City are authorized by Chapter 39.34 RCW, the Interlocal Cooperation Act, to enter into cooperative agreements.

AGREEMENT

In consideration of the terms and conditions contained herein, the parties now agree as follows:

Why We Don’t Have More Agreements

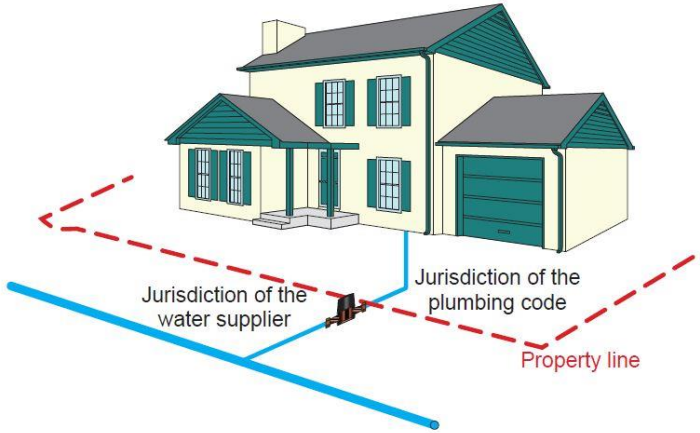
- Time Constraints
- Upper Management Support
- Dual-Agency Coordination
- Where to Start
- Staff Turnover
- Finding the Right Partner



Elements to Consider in an AHJ Agreement

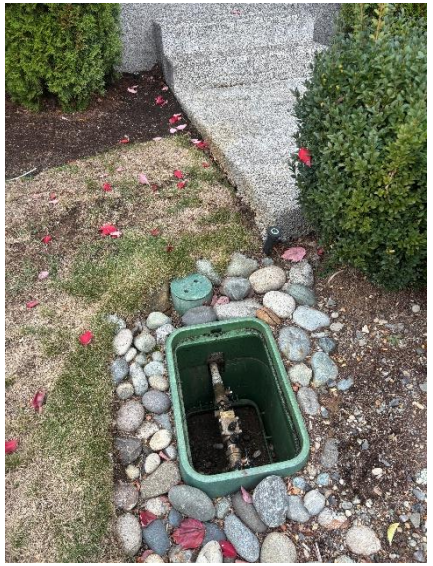
Authority and Responsibilities

- Identification of authority and responsibility
  - Define clear jurisdictional boundaries between water purveyors and AHJs
  - Establish authority for plan review, inspection, and enforcement roles
  - Clarify ownership and oversight of backflow assemblies (installation, testing, compliance)
  - Define jurisdiction: inside vs. outside building responsibility



Premise Isolation vs Fixture Protection

- Define where premise isolation vs. In-premises/ fixture protection is used
- Do both programs have a CCS?
- Clarify jurisdictional boundary of assemblies managed
- Agree on responsibility for existing fixture assemblies
  - AHJ manages all in premise
  - Utility Manages all devices
- Coordinate expectations and ownership of systems







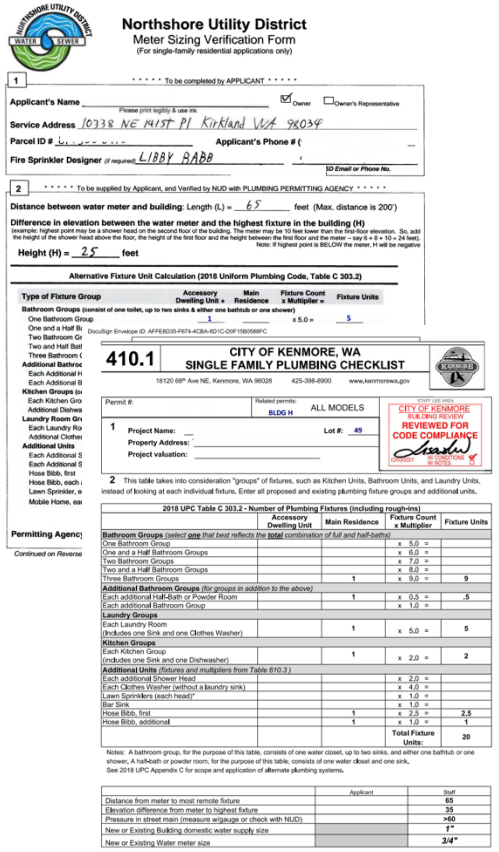
Identification of Hazards and Agreed Upon Protection

- Align Terminology between UPC and WAC
  - Low health hazard vs Pollutant
  - High health hazard vs Contaminant
- Agree what assemblies are to be used for common hazards – (AVB allowed for IRR)

	INDIRECT Backsiphonage Only		DIRECT Backsiphonage & Backpressure
	Continous Use	Non- Continous Use	
Health Hazard (Contaminent)	PVB/SVB RP AIR GAP	AVB PVB/SVB RP AIR GAP	RP AIR GAP
Non-Health Hazard (Pollutant)	PVB/SVB RP DC AIR GAP	AVB PVB/SVB DC RP AIR GAP	DC RP AIR GAP

Plan Reviews Coordination

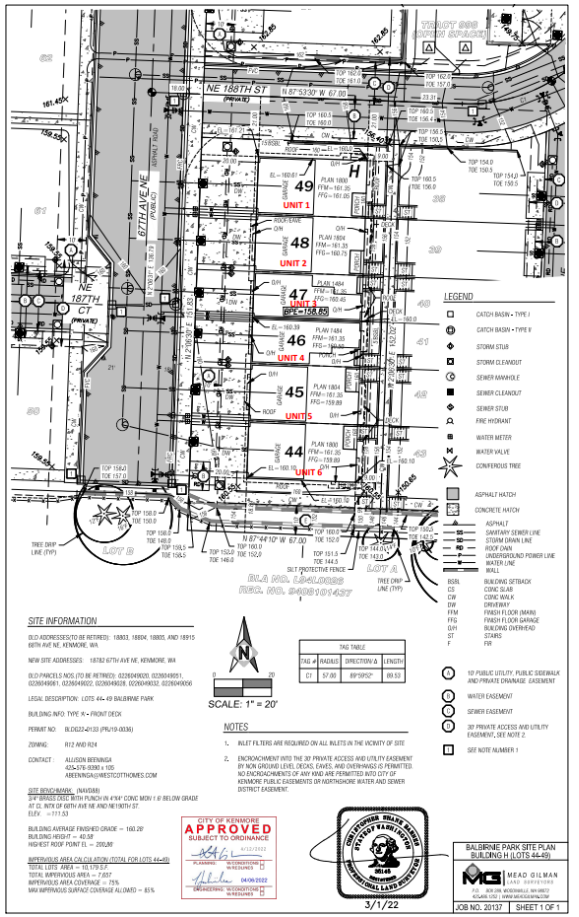
- Communication and coordination between agencies
- New construction projects
- Tenant improvement projects
- Plumbing permits
- Change of occupancy / business use
- Coordination allows opportunity for added permit conditions by the purveyor
- Utility must be informed to effectively protect the public water system



Northshore Utility District
Meter Sizing Verification Form
(For single-family residential applications only)

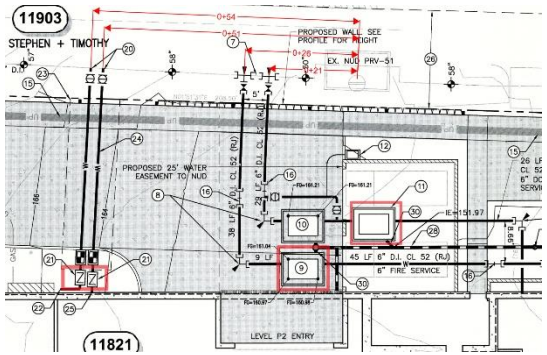
410.1 CITY OF KENMORE, WA
SINGLE FAMILY PLUMBING CHECKLIST

18120 68th Ave NE, Kenmore, WA 98028 425-398-8900 www.kenmorewa.gov



Fire Marshal Coordination

- Fire System Coordination
  - Flow thru systems only for Single family
    - Stand alone fire protection device placement and responsibility
  - Relaying approved permits for fire systems to Utility
  - Fire system changes/ retro fits
  - Testing requirements of new systems
    - May not be in the agreement but affects other members of our teams





Surveying Existing Connections

- Inspections/surveys responsibility and reporting
  - What happens if you come across something that needs to be corrected?
  - If there are Premise Isolation does the water purveyor still survey past that point?
- Clarify inspection authority after occupancy
- Define reporting process when corrections are needed
- Determine escalation path for identified corrections
- Existing device information sharing



Enforcement Coordination

- Clarify whether current Cross Connection Control (CCS) policy allows service shutoffs
- Define enforcement approach for premise isolation vs. in-premise assemblies
- Establish process for requiring and tracking corrective actions
- Confirm roles and responsibilities for enforcement actions between agencies
- Ensure both parties understand each other's enforcement procedures
- Identify appropriate points of contact for enforcement coordination
- Align escalation steps to ensure consistent and timely compliance actions



Local Health Department

- Could be an agreement to coordinate with food and medical facilities
  - Need to coordinate with water shutoffs
  - Can assist with enforcement
  - Could get added to their plan review workflow



Joint Meetings

- Regular coordination meetings between agencies
- Check-ins to review process to correct issues and program improvements
- Maintains communication



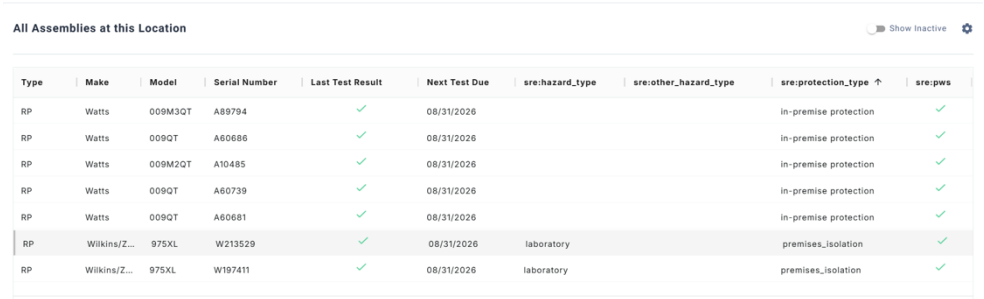
Public Education

- Meet public outreach requirements under WAC 246-290-490
- Coordinate messaging between agencies
- Attend joint public education events
- Present unified cross-connection program
- Shared process information at each agency.



Coordinating Assembly Testing Schedules

- Define coordination when multiple agencies manage different backflow devices
- Align testing schedules to avoid duplication or gaps in testing
- Standardize or coordinate testing notices to customers
- Coordinate communication with certified testers
- Ensure clear identification/labeling of assemblies for testers
- Explore shared or compatible database access for review and coordination
- Establish consistent expectations for backflow test reporting with testers

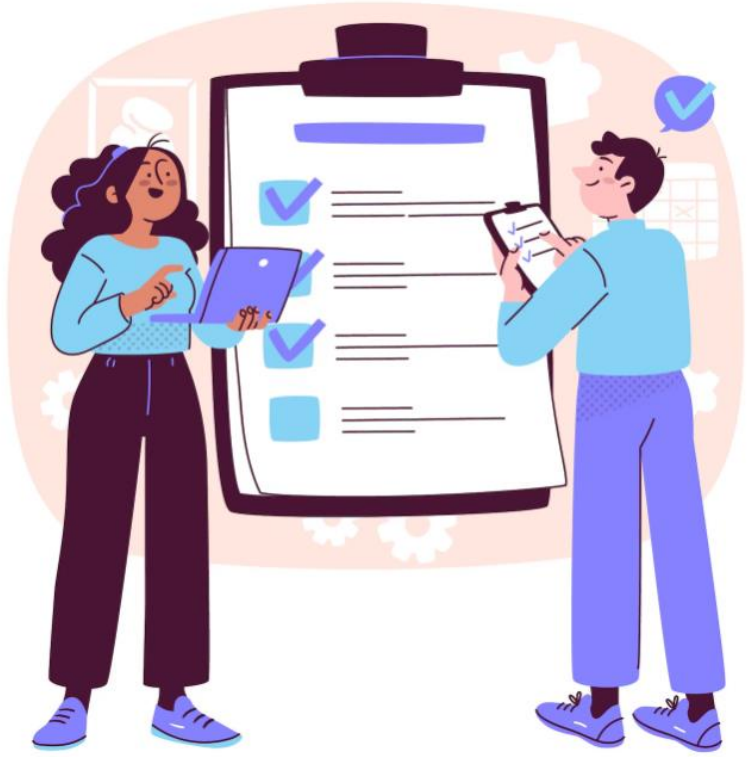


Type	Make	Model	Serial Number	Last Test Result	Next Test Due	sre:hazard_type	sre:other_hazard_type	sre:protection_type	sre:pws
RP	Watts	009M3QT	A89794	✓	08/31/2026			in-premise protection	✓
RP	Watts	009QT	A60686	✓	08/31/2026			in-premise protection	✓
RP	Watts	009M2QT	A10485	✓	08/31/2026			in-premise protection	✓
RP	Watts	009QT	A60739	✓	08/31/2026			in-premise protection	✓
RP	Watts	009QT	A60681	✓	08/31/2026			in-premise protection	✓
RP	Wilkins/Z...	975XL	W213529	✓	08/31/2026	laboratory		premises_isolation	✓
RP	Wilkins/Z...	975XL	W197411	✓	08/31/2026	laboratory		premises_isolation	✓

The Process of Developing and Finalizing an Agreement

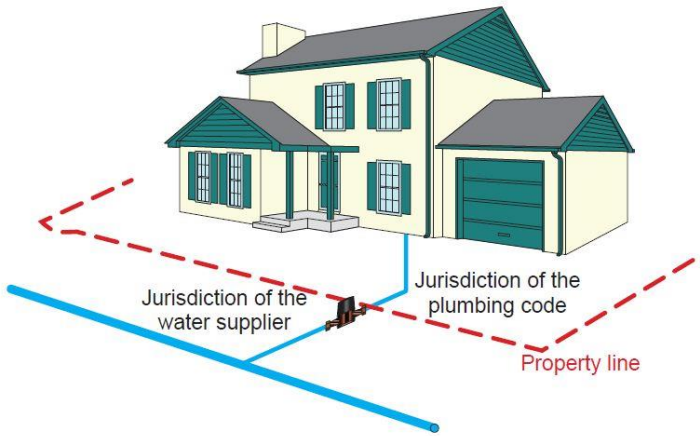
Identify Obstacles and Clarify Outcomes

- Identify AHJ coordination needs (small to large opportunities)
  - Prioritize smaller agreements for quicker implementation
- Evaluate whether existing Cross Connection Control (CC) program supports the effort
  - Determine if CC program updates will be required
- Obtain approval from upper management early in the process
  - Present a clear plan of intended outcomes and deliverables
  - Ensure appropriate authority and personnel are available for negotiations if needed
  - Have support for approval within own agency



Current Coordination (Existing Processes)

- Document existing coordination between both agencies
  - Identify current shared processes and touchpoints
  - Great starting point to get the conversation started
- Clarify roles and responsibilities within active workflows
- Capture informal practices and make them consistent
- Identify successful examples to standardize and expand
- Use current coordination as a foundation for formal agreements
- Build shared understanding and common ground



Draft Meeting Agenda and Potential Agreement

- Identify gaps and improvements in current coordination processes
  - Above elements list can be a starting place to choose
- Build agenda around proposed process improvements and coordination needs
- Explore areas for mutual benefit and shared efficiencies
- Begin outlining potential agreement elements based on discussion outcomes
- Maintain flexibility to adapt discussion based on findings and needs during the meeting
- View processes from the other agency's perspective and adjust messaging accordingly

Goals of Agreement:

- Coordination with New water service
  - Fire system – Coordination with Fire
    - Flow through fire systems for Single family Res
    - Device location out of fire suppression room
    - Inspection of assemblies:
      - Outside NUD
      - Inside Bothell
  - Inside plumbing - Coordination with Building
- Tenant improvement (TI)/remodel
  - Coordination with building
  - What types of requirements happen when there are TI?
    - Example: NUD wants Premise Isolation Per policy.
    - AHJ requires…
- Handling in premise low health hazards
  - Public works – Building
    - Irrigation
    - Fire systems
      - How to enforce locks on these if requested
      - Nonfictions of non-compliance
- New hazard communication
  - Hazard surveys
  - Plumbing permits
  - Other ways of becoming aware of a hazard
- Agree upon appropriate assemblies for hazards protection for hazards
  - AG
  - RP, RP type 2, RPDA
  - DC, DC type 2, DCDA
- What types of requirements happen when there are TI?
- AHJ managing devices internal devices with Premise isolation.
- AHJ Managing low health hazard in premise assemblies provided they have an capacity.

How to Start Building an Agreement

- Identify and make initial contacts in the other agency
- Build professional relationships and trust over time
- Understand their challenges, constraints, and priorities
- Praise what is working well currently, or recent successes
- Share your own challenges and coordination needs
- Focus on creating mutual understanding between agencies
- Look for shared goals and opportunities for collaboration
  - Use essential skills
- Start with a small, achievable “win-win” improvement
- Use early successes to build momentum toward a formal agreement



Building AHJ Teams

- Water Purveyor
  - Senior leadership
    - Provide direction, support, and document approval
  - Permit / Front counter staff
    - May be affected by process changes
    - Coordinate directly with AHJ counterparts
  - Engineering staff
    - Technical coordination with AHJ engineering
    - Maintain AHJ contact relationships
  - Cross Connection Control staff
  - Anyone else affected by this coordination

- AHJ Team
  - Building Department
  - Engineering Department
  - Fire Marshal
  - Utility Cross Connection staff
    - When applicable



Questions?

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