

State Water Resources Control Board

Division of Drinking Water

December 14, 2017

Separation of Water Mains and Non-Potable Pipelines – Requests for Alternatives to the Waterworks Standards

Dear Public Water System Owners and Operators:

This letter supersedes prior guidance regarding the separation of water mains and non-potable pipelines, including Guidance Memo 2003-02, dated October 16, 2003. Guidance Memo 2003-02 and previous versions should be discarded.

The California Waterworks Standards (California Code of Regulations (CCR), Title 22, Division 4, Chapter 16, Section 64572) establish criteria for the separation of new water mains from non-potable pipelines. Public water systems should ensure that these distances are met, whenever feasible, for all new construction. The Division of Drinking Water (Division) recognizes that certain conditions may call for the installation of pipelines with less separation distance than what is required by the regulations. In these situations, the water system may propose an alternative pursuant to CCR, Title 22, Section 64551.100:

§64551.100. Waivers and Alternatives.

- (a) A water system that proposes to use an alternative to a requirement in this chapter shall:
- (1) Demonstrate to the State Board that the proposed alternative would provide at least the same level of protection to public health; and
 - (2) Obtain written approval from the State Board prior to implementation of the alternative.

In proposing an alternative to the Waterworks Standards, water systems should observe the following:

- The water system must accept responsibility for the adequacy of the proposed alternative. The Division may require a written statement, signed by the water system's management, certifying that the proposed alternative adequately protects public health.
- In most circumstances, the Division cannot offer technical assistance with pipeline or infrastructure design. The water system proposing an alternative must demonstrate adequate expertise on the part of its own personnel or its hired consultants.
- The water system should describe how the proposed alternative provides at least the same level of protection to public health as the minimum separation distances prescribed in the regulation.
- While exorbitant cost may present a hardship in meeting the regulatory separation requirements and can be considered, public health must be prioritized above construction costs in determining an acceptable alternative.

The Division has prepared an application checklist that may be used by water systems in proposing an alternative to the Waterworks Standards (Enclosure). The purpose of the checklist is to ensure that the Division has sufficient information to evaluate the proposal. **The water system may submit the information in a different format from the checklist, provided that the submittal provides adequate information.** The checklist may also be used to provide written certification that the proposed alternative adequately protects public health.

If you have any questions, please contact the Division office that oversees your water system.

Sincerely,



Darrin Polhemus, P.E.
Deputy Director
Division of Drinking Water

Enclosure: Waterworks Standards Main Separation Alternative Request Example Checklist