



REGION 3  
PHILADELPHIA, PA 19103

**FILED**  
Jun 02, 2025  
11:09 am  
U.S. EPA REGION 3  
HEARING CLERK

In the Matter of:

City of Rockville, Maryland : Proceeding Pursuant To  
111 Maryland Avenue : Section 1414(g) of the  
Rockville, MD 20850 : Safe Drinking Water Act,  
: 42 U.S.C. § 300g-3(g)  
Respondent. :  
: Docket No. SDWA-03-2025-0061DS  
PWS ID No. MD0150003  
System.

**ADMINISTRATIVE ORDER ON CONSENT**

**I. STATUTORY AUTHORITY**

1. The following FINDINGS are made and this ADMINISTRATIVE ORDER ON CONSENT (the "AOC") is issued under the authority vested in the Administrator of the United States Environmental Protection Agency ("EPA") by section 1414(g) of the Federal Safe Drinking Water Act ("SDWA"), 42 U.S.C. § 300g-3(g). The Administrator of the EPA has delegated the authority to take these actions to the Regional Administrator of EPA, Region 3, who has re delegated these authorities to the Director, Enforcement and Compliance Assurance Division, EPA Region 3.
2. The EPA and the Mayor and Council of Rockville, a municipal corporation and body politic in the State of Maryland ("Respondent"), (collectively "the Parties") agree that resolution of this matter without litigation is in the public interest. The Respondent consents to the issuance of this Administrative Order on Consent ("AOC") and agrees to perform all actions required by its terms and conditions.

**II. FINDINGS OF FACTS AND CONCLUSIONS OF LAW**

3. The Respondent is a supplier of water as defined by section 1401(5) of the SDWA, 42 U.S.C. § 300(f)(5), and the owner/operator of the City of Rockville Public Water System, PWS Identification Number MD0150003 ("System"), located at 111 Maryland Avenue, Rockville, Maryland 20850, which is a "public water system" ("PWS") as defined by section 1401(4) of the SDWA, 42 U.S.C. § 300(f)(4).

4. The Respondent is a “person” as defined by section 1401(12) of the SDWA, 42 U.S.C. § 300(f)(12).
5. The System is a PWS that serves a population of approximately 52,000 persons with piped water for human consumption year-round and has 17,500 service connections. Therefore, the System is a “community water system” (“CWS”) as defined by section 1401(15) of the SDWA, 42 U.S.C. § 300f(15).
6. The State of Maryland has primary enforcement responsibility for public water systems pursuant to the EPA’s final determination that the State has met the requirements of Section 1413 of the SDWA, 42 U.S.C. § 300g-2, and 40 C.F.R. § 142.10, effective March 1, 1978, thus the Maryland regulations are the applicable requirements.
7. Section 1413 of the SDWA, 42 U.S.C. § 300g-2(a)(1), provides that “a State has primary enforcement responsibility for public water systems during any period for which the Administrator determines pursuant to regulations prescribed under [section 1413 of the SDWA, 42 U.S.C. § 300g-2(b)] that such State has adopted drinking water regulations that are no less stringent than the national primary drinking water regulations promulgated under [subsections (a) and (b) of section 1412 of the SDWA, 42 U.S.C § 300g-1(a), (b)] . . .”
8. Pursuant to section 1414(a)(1)(A) of the SDWA, 42 U.S.C. § 300g-3(a)(1)(A) “[w]henver the Administrator finds during a period during which a State has primary enforcement responsibility for public water systems . . . that any public water system . . . for which a variance under section 1415 [42 U.S.C. § 300g-4] or an exemption under section 1416 [42 U.S.C. § 300g-5] is not in effect, does not comply with any applicable requirement . . . he shall so notify the State and such public water system and provide such advice and technical assistance to such State and public water system as may be appropriate to bring the system into compliance with the requirement by the earliest feasible time.”
9. Pursuant to section 1414(a)(1)(B) of the SDWA, 42 U.S.C. § 300g-3(a)(1)(B) “[i]f, beyond the thirtieth day after the Administrator’s notification under [section 1414(a)(1) of SDWA, 42 U.S.C. § 300g-3(a)(1)(A)], the State has not commenced appropriate enforcement action, the Administrator shall issue an order under [section 1414(g) of SDWA, 42 U.S.C. § 300g-3(g)] requiring the public water system to comply with such applicable requirement or the Administrator shall commence a civil action under [section 1414(b) of SDWA, 42 U.S.C. § 300g-3(b)].”
10. Section 1414(g)(1) of the Act, 42 U.S.C. § 300g-3(g)(1), provides that, “[i]n any case in which the Administrator is authorized to bring a civil action under this section or under [section 1445 of the SDWA, 42 U.S.C. § 300j-4], with respect to any applicable

requirement, the Administrator also may issue an order to require compliance with such applicable requirement.”

11. Pursuant to section 1414(i)(4) of the Act, 42 U.S.C. § 300g-3(i)(4), an “applicable requirement” includes “a requirement of . . . an applicable State program for which the Administrator has made a determination that the requirements of [section 1413 of the SDWA, 42 U.S.C. § 300g-2] have been satisfied, or an applicable State program approved pursuant to this part.”
12. On March 20 through 22, 2023, the EPA conducted an announced inspection of the System (“Inspection”) to determine compliance with the SDWA as well as the Maryland drinking water regulations. The Inspection was conducted under the authority of section 1445 of the SDWA, 42 U.S.C. § 300j-4.
13. The Maryland drinking water regulations, COMAR 26.04.01.32(A) state, “[s]uppliers of water to community water systems existing before January 1, 1986, shall prepare and submit for approval to the Approving Authority by January 1, 1988, a plan for controlling cross connections.”
14. The approved Maryland drinking water regulations, COMAR 26.04.01.32(B) state, “[f]ollowing receipt of approval by the Approving Authority for the cross connection control program submitted in compliance with [COMAR 26.04.01.32(A)], including any amendment required by the Approving Authority, the supplier of water shall implement the approved plan.”
15. The Maryland drinking water regulations, COMAR 26.04.01.01, define “Approving Authority” as “the Secretary of the Environment or his designee.”
16. During the Inspection, the EPA observed the following:
  - a. The Respondent did not have a cross connection control program plan (“CCCP plan”) that was approved by the Maryland Secretary of Environment through her designees at the Maryland Department of the Environment (“MDE”); and
  - b. The Respondent has not fully implemented a CCCP plan for the System.
17. The Respondent’s failure to submit a CCCP plan to MDE and implement an approved CCCP plan are violations of COMAR 26.04.01.32 and of an “Applicable Requirement” under the SDWA.
18. On July 31, 2024, the EPA issued a Notice of Violation (NOV) (Docket No. SDWA-03-2024-004-VS) to the Respondent for its failure to submit a CCCP plan to MDE and implement an approved CCCP plan pursuant to COMAR 26.04.01.32. Through its NOV, the EPA notified MDE and the Respondent in accordance with section 1414(a)1

of SDWA, 42 U.S.C. § 300g-3(a)(1)(A).

19. On August 5, 2024, the Respondent submitted a CCCP plan to MDE for review. MDE approved the Respondent's CCCP plan on August 9, 2024 and the amended plan on April 25, 2025. As such, the Respondent has brought the System into compliance with COMAR 26.04.01.32(A).
20. As of the Effective Date of this AOC, the Respondent has not completed implementation of the CCCP plan approved by MDE on August 9, 2024, nor has MDE commenced an appropriate enforcement action. Therefore, Respondent remains in violation of COMAR 26.04.01.32(B) and the EPA is issuing this AOC in accordance with section 1414(a)1 of SDWA, 42 U.S.C. § 300g-3(a)(1)(A).

### III. ORDER FOR COMPLIANCE

Based on the foregoing FINDINGS, and pursuant to the authority of Section 1414(g) of the SDWA, 42 U.S.C. § 300g-3(g), EPA hereby ORDERS and Respondent agrees as follows:

#### Implementation of Cross Connection Control Program Plan

21. The Respondent shall implement the CCCP plan approved by MDE on April 25, 2025. The CCCP plan is set forth in Attachment A (City of Rockville Cross-Connection Control Program Plan April 2025) to this AOC. For the purposes of this paragraph, implementation of the CCCP shall mean meeting all requirements of Paragraphs 22 and 23 of this AOC.
22. The Respondent shall perform the following actions as it relates to implementation of the CCCP plan attached as Attachment A:
  - a. Within 60 calendar days of the Effective Date of this AOC, the Respondent shall establish a platform for management of the backflow assembly database as well as annual test reminder letters and fee collection for test report fees. The backflow assembly database shall include assembly locations and test reports for all commercial buildings.
  - b. Within 60 calendar days of the Effective Date of this AOC, the Respondent shall:
    - i. Hire a part-time inspector ("Backflow Inspector") responsible for implementation and enforcement of the CCCP plan, including performing inspections of commercial buildings to verify the backflow assembly database and annual test report activity; and
    - ii. Develop, solicit, and procure a request for proposal ("RFP") for a consultant to complete a containment-level survey of backflow

prevention assemblies in existing commercial buildings. The consultant shall collect the location, type of assembly, and fixture connection, and identify locations where backflow assembly installations are needed.

c. On or before January 31, 2028:

- i. The Respondent shall perform outreach to certified testers and all commercial building managers regarding the requirements of the CCCP;
- ii. The Backflow Inspector hired pursuant to Paragraph 22.b.i. shall inspect commercial buildings to ensure all testing reports are consistent with the backflow assembly database and perform enforcement for those failing to submit test reports; and
- iii. The consultant retained pursuant to Paragraph 22.b.ii. shall survey all commercial buildings to ensure backflow assemblies are installed on correct fixtures and that testing on assemblies is current.

d. On or before December 31, 2028, the Respondent shall ensure that the backflow assembly database is completed.

23. Reporting Requirement. The Respondent shall submit written progress reports of the System's progress on the implementation of the CCCP plan for the actions described in Paragraph 22. The written reports shall be submitted by the Respondent within thirty (30) days after the end of each quarter ending December 31, March 31, June 30, and September 30 via electronic mail to the EPA contact noted in Section V (Procedures for Submission). The Respondent shall continue submitting such reports until EPA closes out this AOC by written correspondence to the Respondent in accordance with Section VI (Termination). Each report shall describe the Respondent's status in implementing the CCCP plan, and shall include, at a minimum:

- a. Activities completed during the reporting period;
- b. Dates by which the activities were completed;
- c. Any barriers to the timely completion of activities encountered; and
- d. Activities currently in progress.

24. Submission of progress reports shall not excuse the Respondent's obligation to comply with this AOC.

#### IV. GENERAL PROVISIONS

25. For the purposes of this AOC, the Respondent admits the jurisdictional allegations set forth in this AOC.
26. Except as provided in Paragraph 19, above, the Respondent neither admits nor denies the specific factual allegations set forth in this AOC.
27. The Respondent waives any and all remedies, claims for relief and otherwise available rights to judicial or administrative review that the Respondent may have with respect to any issue of fact or law set forth in this AOC, including any right of judicial review pursuant to Chapter 7 of the Administrative Procedure Act, 5 U.S.C. §§ 701 – 706.
28. The provisions of this AOC shall apply to and be binding upon the Respondent and its officers, directors, employees, contractors, agents, trustees, successors and assigns.
29. From the Effective Date of this AOC until Termination as set out in Section VI (Termination), below, the Respondent must give written notice and a copy of this AOC to any successors in interest prior to any transfer of ownership or control of any portion of or interest in the System. Simultaneously with such notice, the Respondent shall provide written notice of such transfer, assignment, or delegation to the EPA. In the event of any such transfer, assignment, or delegation, the Respondent shall not be released from the obligations or liabilities of this AOC unless the EPA has provided written approval of the release of said obligations or liabilities.
30. The Respondent shall bear its own costs and attorneys' fees in connection with this proceeding and associated with the implementation or enforcement of this AOC, including any costs related to resolution of any dispute arising regarding this AOC.
31. This AOC does not waive, suspend, or modify the requirements of the SDWA, 42 U.S.C. §§ 300f-300j-26, and its implementing regulations found in 40 C.F.R. Part 141, which remain in full force and effect. Issuance of this AOC is not an election by the EPA to forgo any civil or criminal action otherwise authorized under SDWA.
32. Any violation of the terms of this AOC may result in further enforcement action by the EPA, including the imposition of administrative penalties of up to \$67,544 per day for each day of violation that occurs, or a judicial action including the imposition of civil penalties, pursuant to section 1414(g) of SDWA, 42 U.S.C. § 300g-3(g), as modified by the Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701 *et seq.*, and subsequent Civil Monetary Penalty Inflation Adjustment Rule, 40 C.F.R. Part 19.

33. Compliance with the terms and conditions of this AOC shall not in any way be construed to relieve the Respondent of its obligation to comply with all applicable provisions of federal, state, or local law, nor shall it be construed to be a determination of any issue related to any federal, state, or local permit. Compliance with this AOC shall not be a defense to any actions subsequently commenced for any violation of federal laws and regulations administered by the EPA, and it is the responsibility of the Respondent to comply with such laws and regulations.
34. The EPA reserves any existing rights and remedies available to it under the SDWA, the regulations promulgated thereunder, and any other federal laws or regulations for which the EPA has jurisdiction. This AOC shall not prohibit, prevent, or otherwise preclude the EPA from taking whatever action it deems appropriate to enforce the SDWA in any matter and shall not prohibit, prevent, or otherwise preclude the EPA from relying on this AOC in subsequent administrative proceedings.
35. The EPA reserves the right to commence an action against any person, including the Respondent, in response to any condition which the EPA determines may present an imminent and substantial endangerment to the public health.
36. The EPA and its authorized representatives, including contractors, shall have authority upon the presentation of proper identification to enter the premises of the Respondent at any time without prior notification to monitor the activities required by this AOC, verify any data or information submitted pursuant to this AOC, obtain samples, and inspect and review any records generated and/or maintained pursuant to this AOC. The EPA reserves and, does not waive, any and all existing inspection and information request authority.
37. The undersigned representative of the Respondent certifies that they are fully authorized by the Respondent to enter into the terms and conditions of this AOC and to execute and legally bind the Respondent.
38. The Respondent certifies that any information or representation it has supplied to the EPA concerning this matter was, at the time of submission true, accurate, and complete and that there has been no material change regarding the truthfulness, accuracy or completeness of such information or representation. The EPA shall have the right to institute further actions to recover appropriate relief if the EPA obtains evidence that any information provided and/or representations made by the Respondent to the EPA regarding matters relevant to this AOC are false or, in any material respect, inaccurate. This right shall be in addition to all other rights and causes of action that the EPA may have, civil or criminal, under law or equity in such event. The Respondent and its officers, directors and agents are aware that the submission of false or misleading information to the United States government may subject a person to separate civil and/or criminal liability.

- 39. The Respondent consents to service of this AOC by e-mail at the following valid e-mail address(es): jwoods@rockvillemd.gov and gmaggard@rockvillemd.gov.
- 40. Pursuant to Section 1414(g)(2) of the SDWA, 42 U.S.C. § 300g-3(g)(2), a copy of this Order will be provided to MDE.
- 41. Effective Date. This AOC shall become effective on the date it is filed with the Regional Hearing Clerk after signature by the Director of the Enforcement and Compliance Assurance Division, EPA Region 3.

V. PROCEDURES FOR SUBMISSIONS

- 42. All documents required to be submitted by this AOC and any Request for Termination shall be accompanied by a signed certification that reads as follows:

*I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.*

Signed: \_\_\_\_\_  
 Title: \_\_\_\_\_  
 Date: \_\_\_\_\_

- 43. The Respondent may assert a business confidentiality claim covering part of or all of the information which this AOC requires it to submit to the EPA, but only to the extent and only in the manner described in Part 2 Subpart B of Title 40 of the C.F.R. The EPA will disclose information submitted under a confidentiality claim only as provided in Part 2 Subpart B of Title 40 of the C.F.R. If, at the time any information is submitted to the EPA, the Respondent does not assert a confidentiality claim, the EPA may make the submitted information available to the public without further notice to the Respondent.
- 44. Unless otherwise directed in writing, the Respondent shall submit any submission or written communication, including any accompanying data, relating to this AOC via email to:

[calcinore.sara@epa.gov](mailto:calcinore.sara@epa.gov)  
 Sara Calcinore  
 SDWA & Wetlands Section (3ED31)

Enforcement and Compliance Assurance Division  
U.S. Environmental Protection Agency, Region 3  
(215) 814-2043

45. Any information submitted electronically shall be submitted in a widely recognized electronic format.

VI. TERMINATION

46. The provisions of this Order shall be deemed satisfied upon the Respondent's receipt of written notice from the EPA that the Respondent has demonstrated, to the satisfaction of the EPA, that the terms of this Order have been satisfactorily completed.

47. Certification of Compliance and Request for Termination. Respondent may submit to the EPA a Certification of Compliance and Request for Termination of this AOC, including necessary documentation to demonstrate that it has met all requirements of this AOC.

a. Such certification and request shall include:

- i. A certification that the Respondent has maintained compliance with this AOC for the term of this AOC; and
- ii. All necessary documentation, including photo documentation as appropriate, to support a finding that the Respondent has complied with Section III (Order for Compliance) of this AOC.

b. If, following review of any Certification of Compliance and Request for Termination of this AOC, the EPA agrees that the Respondent has adequately complied with all requirements of this AOC, then the EPA may, in its unreviewable discretion, provide written notification of termination of this AOC.

VII. AOC MODIFICATIONS

48. Any request to modify the terms of, or parties to, this AOC shall be submitted, in writing, by the Respondent to the EPA and shall be subject to review and approval by the EPA, in its sole and unreviewable discretion. The Respondent's submission of a written request for modification of this AOC shall not relieve Respondent of any obligation under this AOC and shall have no effect on the EPA's statutory or regulatory authority to enforce the terms of this AOC, in its sole and unreviewable discretion.

*In re: City of Rockville, Maryland*

*EPA Docket No. SDWA-03-2025-0061DS*

**SO ORDERED:**

**FOR U.S. ENVIRONMENTAL PROTECTION AGENCY**

By:

\_\_\_\_\_ *[Digitally signed and dated]*

Karen Melvin

Director

Enforcement and Compliance Assurance Division

U.S. Environmental Protection Agency, Region 3

*In re: City of Rockville, Maryland*

*EPA Docket No. SDWA-03-2025-0061DS*

**FOR THE MAYOR AND COUNCIL OF ROCKVILLE**

By: Jeff Mihelich 5/20/2025  
[Digitally signed and dated]  
Jeff Mihelich  
Rockville City Manager

*In re: City of Rockville, Maryland*

*EPA Docket No. SDWA-03-2025-0061DS*

Attachment A – City of Rockville Cross-Connection Control Program Plan April 2025



**City of Rockville**  
**Cross-Connection Control**  
**Program Plan**  
**April 2025 (Amendment)**

## Background

By law, water purveyors such as the City of Rockville, are required to have and implement a plan for controlling cross-connections. A cross-connection is an actual or potential connection between the public water supply and a source of contamination or pollution that could occur from equipment attached to the water line. To control potential connections, backflow assemblies are installed on "high hazard" fixtures to ensure potentially contaminated water from a building does not back-up into the main potable water distribution system.

## Required Program Elements

Program elements required for a comprehensive Cross-Connection Control Program (CCCP) are listed below along with the City of Rockville's progress toward achieving required elements.

- 1. Cross-Connection Prevention Ordinance.** The ordinance concerning cross-connection is included in Chapter 24 of the City Code, "Water, Sewers and Wastewater Disposal". The cross-connection component of the code was approved by the Maryland Department of the Environment (MDE) on February 8, 2019, and the entire Chapter 24 was approved by Mayor and Council on July 8, 2019. The ordinance establishes authority for the program, technical provisions relating to eliminating backflow and cross-connections, and penalty provisions for violations. It also addresses required installation in new facilities and associated maintenance, repair, inspection, and annual testing of backflow prevention devices.
- 2. Public Outreach.** CCCP public outreach is directed to commercial sectors within the City of Rockville and notifies building management that backflow testing must be performed annually and submitted to the [City](#).

The [City](#) has developed a CCCP website. Further outreach will include news articles, social media reminders, partnerships with the Chamber of Commerce and the Rockville Economic Development, Inc., announcements in water bills, as well as exploration of other avenues to educate commercial property

- owners.
- 3. Backflow Prevention Database and Verification of Location.** The City has an inventory of approximately 1,000 assemblies and will complete a comprehensive survey of existing commercial buildings to expand the inventory. To expand the current inventory, the City is hiring a consultant to survey installation of suitable backflow assemblies in all commercial buildings. The consultant will collect the location, type of assembly, and fixture connection and identify locations where additional backflow assembly installations are needed.
  - 4. Platform Development for Backflow Inventory.** The City has developed a platform to collect backflow test reports and fees, installation locations, and inspection locations using Formstack and geographic information systems (GIS). Test report reminders are sent monthly for the following month to businesses currently in our database.
  - 5. Enforcement Action.** Enforcement focuses on repair, replacement, new installation, and/or completion of an annual test.
    - o A part-time staff member is currently performing inspections of 1000 commercial buildings to verify the database and annual test report activity.
    - o When an assembly is not in compliance, the inspector issues an inspection letter noting any corrections needed to achieve compliance within a specified time period, two weeks for test reports and two months for installation. If compliance is not achieved a Notice of Violation (NOV) is issued with a compliance plan whereby completion timelines for each violation are addressed. Chapter 24 of the Rockville City code authorizes additional enforcement options including penalties if needed to gain compliance.
  - 6. Standard Operating Procedure (SOP).** The City has an existing SOP that provides instructions for the following tasks:
    - o Performing inspections of newly installed backflow prevention devices.
    - o Methodology and location of data entry of device serial number, type, and date of next annual test.
    - o Enforcement methodology and criteria for issuance of an NOV and compliance report.
    - o Where to submit annual testing information for efficient and accurate recordkeeping.
    - o How to handle a backflow emergency.
  - 7. Permit Development.** A plumbing permit is required for all new installations. The permit form is already in use by Community Planning and Development Services, Inspection Services Division. All new installations are required to be tested and plumbers performing the installation submit test reports and fees to the in house administrative platform which is located on the City webpage.

- 8. Recordkeeping.** Our in-house platform is used to collect and manage data. Through this platform, inspections, are tracked as are test report submittal and fees. The platform includes a dashboard and map which tracks all activities by address. City staff send reminder letters to businesses in our current database when testing is required. When testing is complete, the certified tester uploads the reports and fee to the platform. All test reports are collected and kept in the system to be viewed by City staff.
- 9. Required Reporting.** Any facility that has one or more backflow prevention assembly is required to have each assembly tagged showing the installation inspection date (backflow prevention tag) and submit annual backflow prevention assembly test reports to the City the city's in house administrative platform.
- o **Backflow Prevention Inspection Tag.** The backflow prevention tag is used to identify the date of installation and will stay attached to the backflow prevention device and replaced each year when testing occurs. The backflow prevention inspection tag identifies the model type, serial number, and the replacement date. The tag will be distributed to the plumber at the time the plumbing permit is acquired.
  - o **Backflow Prevention Assembly Test Report.** The test report is an annual submission and is submitted by the certified cross-connection tester to the platform where the test report and fee are tracked through the dashboard.

## Cross-Connection Control Program Implementation

### Program Funding

The adopted FY 2025 budget appropriated funds to implement the CCCP and established a fee schedule for annual backflow test reports. The program and fee structure are incorporated into the 10-year water and sewer rate study. Program funding supports the following:

1. Consultant support to survey backflow assemblies installed on fixtures in commercial buildings and identifying where new assemblies are required to avoid cross-connections.
2. Adding a part-time regular employee to verify installation of assemblies, annual testing, and perform enforcement.
3. Providing a platform to support annual test reminder letters, collect test report fees and manage the data base of all assembly locations and test reports.

### Program Timeline

The following is an estimated timeline to implement these tasks.

- **May 2024 to January 2025:**
  - Recruit the new part-time inspector position. This task is completed.
  - Develop and solicit, and procure an RFP for a consultant to survey assembly installations in commercial buildings. The RFP has been prepared and solicited. Proposals are currently being reviewed for the surveyor position.
- **October to December 2024:** Development of an in-house online platform to manage the database management, letter reminders, and fee collection.
- **January 2025 to January 2028:**
  - Perform outreach to certified testers and all commercial building managers that program requires the following:
    - A fee for all test reports.
    - A consultant will survey all commercial buildings for the next three years to ensure backflow assemblies are installed on correct fixtures and that testing on assemblies is current.
    - The backflow inspector inspects buildings to ensure all testing reports are consistent with what is reported to the administrative database. This position performs enforcement for those businesses failing to submit test reports.
- **Post 2028:**
  - Contractor inventory will be complete.
  - Part time staff will maintain and continue to check inventory during daily inspections.
  - Part time staff will perform enforcement to ensure installation is occurring and test reporting is current.

## Conclusion

This CCCP workplan serves as an intermediary plan in the development of the program that will ensure the safety of the City's potable water system for Rockville's residents and businesses.

In re: City of Rockville, Maryland

EPA Docket No. SDWA-03-2025-0061DS

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 3  
Philadelphia, Pennsylvania 19103**

<b>In the Matter of:</b>	:	
	:	
City of Rockville, Maryland	:	<b>U.S. EPA Docket No. SDWA-03-2025-0061DS</b>
111 Maryland Avenue	:	
Rockville, MD 20850	:	
	:	<b>ADMINISTRATIVE ORDER ON CONSENT</b>
<b>Respondent.</b>	:	<b>PURSUANT TO SECTION 1414(g) OF THE SAFE</b>
	:	<b>DRINKING WATER ACT, 42 U.S.C. § 300g-3(g)</b>
PWS ID No. MD0150003	:	
	:	
<b>System.</b>	:	

**CERTIFICATE OF SERVICE**

I certify that the foregoing Administrative Order on Consent was filed with the EPA Region 3 Regional Hearing Clerk on the date that has been electronically stamped on the Administrative Order on Consent. I further certify that on the date set forth below, I caused to be served a true and correct copy of the foregoing Administrative Order on Consent to each of the following persons, in the manner specified below, at the following addresses:

Copies served via UPS and email to:

Sara Taylor-Ferrell  
City Clerk/Director of Council Operations  
111 Maryland Avenue Rockville, MD 20850  
[sferrell@rockvillemd.gov](mailto:sferrell@rockvillemd.gov)

Copies served via email to:

Ryan Knapick  
Assistant Regional Counsel  
U.S. EPA, Region 3  
[knapick.ryan@epa.gov](mailto:knapick.ryan@epa.gov)

Sara Calcinore  
SDWA & Wetlands Section  
Enforcement and Compliance Assurance Division  
U.S. EPA, Region 3  
[calcinore.sara@epa.gov](mailto:calcinore.sara@epa.gov)

Krysten Kruper

*In re: City of Rockville, Maryland*

*EPA Docket No. SDWA-03-2025-0061DS*

Planning and Compliance Division  
Water Supply Program  
MDE  
krysten.kruper@maryland.gov

By: \_\_\_\_\_

*[Digital Signature and Date]*

Regional Hearing Clerk  
U.S. EPA, Region 3