

# Form #1

## Petition to Adopt, Amend, or Repeal Commission Regulations

Approved 10-3-1995



NEVADA  
STATE ENVIRONMENTAL  
COMMISSION

### 1. Name, address, telephone number, and signature:

Name: Brendon Grant

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Telephone Number: 775 687-9524

Date of Petition: June 22, 2022

Representative capacity and signature of petitioner, authorized individual, officer or attorney:

Brendon M. Grant BSDW Engineering Branch Supervisor

### 2. Specific type of petitioner (individual, partnership, corporation, government agency, or other) and the exact occupation or business, including a description of the occupation or business if necessary:

Governmental Agency  
Department of Conservation and Natural Resources (DCNR)  
Nevada Division of Environmental Protection (NDEP)  
Bureau of Safe Drinking Water (BSDW)

### 3. Exact and specific nature of changes sought, including delineation of the regulations, statutory provisions of Commission decisions involved. May include a statement of the written term or substance of the proposed regulatory action, or a description of the subjects and issues involved:

Sections 1-3 & 7: Address definition and allowance for Passive Purge Fire Sprinkler Systems.  
Sections 4 & 13: General updates and regulation cleanup.  
Section 5: Provide a timeline and requirement for "as-built" engineering drawings after construction completion. This provision will become consistent with NAC 445A.67641.  
Sections 6-9: Various revisions to the cross-connection control regulations include removing the backflow assembly requirement on a townhome and allowing a passive purge fire sprinkler system  
Sections 10-12: Various revisions to water system pumping facility regulations.  
Sections 14-15: Clarify that pumps and distribution system components must be compatible with drinking water as defined in NAC 445A.65825.

**4. A statement of the need for and purpose of the proposed regulations:**

The proposed regulations need to be updated to follow best engineering practices and judgment. Several special exceptions to the existing NACs have been submitted and approved related to these proposed revisions, and many stakeholders have expressed frustration that best practices and judgment do not align with NAC 445A regulations. These amendments seek to revise the regulations to prevent special exceptions from having to be requested during project review.

In addition, there have been instances where older buildings do not have a backflow preventer on the fire line, which exposes the water system to contamination during a backflow event. When retrofitting buildings with backflow prevention, water systems have expressed concern over potential adversely affects a backflow device can have on the operation of a fire sprinkler system that protects life and property. Both the fire sprinkler system and public water system are key to protecting public health, life, and property, and both systems need to be designed to complement each other.

**5. A statement of the:**

(a) Estimated economic effect of the regulation on the business which it is to regulate:

There is no anticipated economic effect of the revisions on a public water system.

(1) Both adverse and beneficial effects:

Adverse: None.

Beneficial: Ensure that best engineering practice and judgment are followed in the design of a public water system infrastructure.

(2) Both immediate and long-term effects:

None.

(b) Estimated economic effect on the public:

None.

(1) Both adverse and beneficial effects:

Adverse: None.

Beneficial: The public will be protected because best engineering practice and judgment will be followed in the design of public water systems, and modifications to a fire sprinkler system will protect life and property in the building.

(2) Both immediate and long-term effects:

None.

(c) Estimated cost by the agency for enforcement of the proposed regulation:

No cost will be incurred by the agency to enforce the proposed regulation revisions.

**6. A description of any regulations for other state or government agencies which the proposed regulation overlaps or duplicates and a statement explaining why the duplication or overlapping is necessary. If the regulation overlaps or duplicates a federal regulation, the name of the regulating federal agency:**

The proposed regulation revisions do not overlap or duplicate other state or government agencies.

**7. If the regulation includes provisions which are more stringent than a federal regulation which regulates the same activity, a summary of such provisions. The statement must include the specific citation of the federal statute or regulation requiring such adoption:**

None.

**8. If the regulation provides a new fee or increases an existing fee, the total annual amount the agency expects to collect and the manner in which the money will be used:**

The proposed regulation revisions do not incorporate a new fee or increase an existing fee.

### Supporting Documents



When submitting this form, attach a second document to your email with your proposed regulatory language. Include other supporting documents as needed.

