Emergency Response Plan Requirements for Water Systems Serving 3,300 People or Less

Presented by Chantal Wikstrom

Oregon Health Authority

DRINKING WATER SERVICES
Public Health Division

Agenda

- Why rules were updated
- Requirements
    - CWS & NTNC systems serving 3,300 or less
- Outreach items
    - Website
    - Guidance documents
    - ERP templates

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Emergency Response & Planning Rule

- Why were the rules changed?
  - Align with EPA's AWIA requirements to develop risk and resilience assessment and emergency response plan (for systems serving over 3,300)
  - Increase resilience among smaller water systems
  - Improve coordination and communications between water systems, state agencies and local emergency managers
  - Reduce requirements for Transient Non-Community (TNC) and Oregon Very Small (OVS) systems

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Requirements

CWS and NTNC systems serving 3,300 people or less:

- Emergency Response Plan (ERP) must include plans for reasonably anticipated emergencies – depends on the risks to the individual water system

- Plan for physical security measures – alarms, locks, signage, etc.

- If water system utilizes computer networks, automated control, or monitoring process systems then cybersecurity measures must be implemented
    - Establishing password policy based on current cybersecurity standards
    - Monitoring for suspicious activity
    - Installing and updating anti-virus or anti-malware software

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Requirements Continued

- Response procedures:
  - Isolating parts of the system
  - Emergency disinfection
  - Issuing boil or do-not-drink advisories
  - Loss of electrical power
  - Disruption/failure of disinfection or other treatment systems
  - Detection of E. coli bacteria or other contaminants exceeding the MCL
  - How to coordinate with local emergency managers

Certification: Systems do not need to send in or certify that their plans are complete.

Surveys: Ensure that ERPs are on hand and available to staff during emergencies.
  - Review the ERP during surveys
  - Some system have emergency response procedures in their O & M manuals

Outreach Items

Emergency Preparedness and Planning

Drinking Water Services

Emergency Response

Emergency Preparedness and Planning

Contact Us

Emergency Response and Planning

Templates for water systems
- Emergency Response and Planning Guidance for Water Systems 📄MS Word or 📄PDF
- CWS NTNC (serving 3,300 people or fewer) ERP Template 📄MS Word or 📄PDF
- CWS (serving over 3.300 people) Supplemental ERP Template 📄MS Word or 📄PDF
- Emergency Response and Planning Checklist for Water Systems 📄MS Word or 📄PDF

OAR 333-061-0064 became effective January 1, 2022.

Community and Non-transient, Non-community (NTNC) water systems serving 3,300 people or fewer:
These systems are required to develop and maintain an emergency response plan (ERP) that can be accessed by water system staff during emergencies. DWS has developed an emergency response plan template for Community and NTNC water systems serving 3,300 people or fewer.

Community Water Systems serving more than 3,300 people:
Emergency response and planning requirements have been updated to align with America's Water Infrastructure Act (AWIA) which requires Community Water Systems (CWS) serving more than 3,300 people to conduct a risk and resilience assessment (RRA) and develop and maintain an ERP based on the findings from the assessment.

There are additional requirements for CWS serving more than 3,300 people and DWS has developed a supplemental template for these systems to add to their current AWIA compliant ERP. Additional requirements include:

- developing procedures for emergency events involving high-risk contaminant sources or activities,
- identifying institutional customers serving vulnerable populations,
- developing, and maintaining an emergency contact list,
- identifying decision making authorities, and
- developing procedures for notifying agencies, customers, and local media during emergencies.

Note: Water systems are not required to certify to DWS that their plans are complete and should not send documents with critical information to DWS. These documents must be made available for review during the water system's sanitary survey.

- DEQ's Source Water Assessment website
- EPA's Vulnerability Self-Assessment Tool (free, downloadable tool applies to both small and large water systems)
- How to certify completion of RRA or ERP to the EPA – for systems serving over 3,300 people

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Outreach Items

- Emergency Response and Planning Guidance for Water Systems

https://www.oregon.gov/oha/PH/HEALTHYENVIRONMENTS/DRINKINGWATER/PREPAREDNESS/Documents/ERP-guidance-2022.pdf

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Emergency Response and Planning Guidance for Water Systems

Drinking Water Services (DWS) has emergency response plan requirements (OAR 333-061-0064) for all Community and Non-transient, Non-community (NTNC) water systems in Oregon. Under the rules, all Community and NTNC water systems serving 3,300 people or less are required to develop and maintain an emergency response plan (ERP) than can be accessed by water system staff during emergencies. These rules have been updated to align with America's Water Infrastructure Act (AWIA) which requires community water systems serving more than 3,300 people to conduct a risk and resilience assessment (RRA) and develop and maintain an ERP based on the findings from the RRA.

When does this rule go into effect?
January 1, 2022

When does the ERP need to be updated and certified?
Water systems are not required to certify to DWS that their plans are complete and should not send documents with critical information to DWS. These documents must be made available for review during the water system's sanitary survey.

For community water systems serving more than 3,300 people, both the RRA and ERP should be updated at least every 5 years after the initial due dates under AWIA. Additionally, these systems must submit a certification of completion to the Environmental Protection Agency (EPA).

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Outreach Items

- Elements of a Complete ERP for Community and Non-Transient, Non-Community Water Systems (Checklist)

Elements of a Complete Emergency Response Plan for Community and Non-transient, Non-community Water Systems Serving 3,300 people or less

[PWS Name, #41-0000] [Date]

Emergency Response Plan Elements	Complete? Yes	No
Must include response procedures for reasonably anticipated emergencies	☐	☐
Plan for physical security measures	☐	☐
Procedures for isolating parts of the water system, emergency disinfection and process for issuing water advisories to customers	☐	☐
Response procedures and process for issuing water advisories to customers in the event of loss of electrical power	☐	☐
Response procedures and process for issuing water advisories to customers in the event of a loss of pressure in the distribution system	☐	☐
Response procedures and process for issuing water advisories to customers in the event of a disruption or failure of disinfection or other treatment systems	☐	☐
Response procedures and process for issuing water advisories to customers in the event of a detection of E. coli bacteria or another contaminant exceeding the MCL	☐	☐
If computer networks, or automated control or monitoring systems are utilized by the system, implement cybersecurity measures such as establishing a password policy based on current cybersecurity standards	☐	☐
If computer networks, or automated control or monitoring systems are utilized by the system, implement cybersecurity measures such as creating a software update plan	☐	☐
If computer networks, or automated control or monitoring systems are utilized by the system, implement cybersecurity measures such as monitoring suspicious activity	☐	☐
If computer networks, or automated control or monitoring systems are utilized by the system, implement cybersecurity measures such as installing and updating antivirus or anti-malware software	☐	☐
Coordinate with local emergency management agencies in the event of an emergency that overwhelms water system staff's ability to respond	☐	☐

https://www.oregon.gov/oha/PH/HEALTHYENVIRONMENTS/DRINKINGWATER/PREPAREDNESS/Documents/ERP-checklist-2022.pdf

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Outreach Items

- Emergency Response Plan templates

https://www.oregon.gov/oha/PH/HEALTHYENVIRONMENTS/DRINKINGWATER/PREPAREDNESS/Pages/emergency.aspx

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Other Resources

- DWS wildfire resources
- Post wildfire VOC monitoring
- DWS Public Notice Templates
    - Translation templates
    - Public Notification Rules
- AWIA 2018
- DWS Risk & Resilience and Emergency Response Plan template
- DWS Water Hauling Guidelines
- Coliform alert response procedures
- BMPs (Repairing Water Mains, Reduced Pressure Events)
- Coordination of Water and Emergency Services Sector (EPA article)

Thank you!

Questions or feedback on emergency response plans?

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