

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WSG 4

Date Signed: October 29, 1976

MEMORANDUM

SUBJECT: Guidelines for Preparation and Review of  
State Emergency Plans

FROM: Alan Levin, Director (signed by Alan Levin)  
State Programs Division  
Office of Water Supply (WH-550)

TO: Regional Water Supply Representatives

Your comments on the initial draft of the above subject Guidance, received in response to our request dated May 5, 1976, have been reviewed and evaluated. As a result of your comments and suggestions, a number of changes have been made in the text.

Attached herewith is the final version of the Guidance for your information and use.

Attachment

## GUIDELINES FOR PREPARATION AND REVIEW OF THE STATE EMERGENCY PLAN

Section 1413 of the Safe Drinking Water Act provides for a State to have primary enforcement responsibility for public water systems if EPA determines that the State has satisfied 5 basic conditions specified in Section 1413. One of the conditions (Sec. 1413(a)(5)) requires that a State, "Has adopted and can implement an adequate plan for the provision of drinking water under emergency circumstances." A State is not required to have an individual plan for each public water system. All that is required is a State-wide plan for responding to emergencies. A State must submit to EPA, pursuant to 40 CFR 142.11(a)(5), a brief description of its plan. The adequacy of the plan should be determined on the basis of this submission.

This guidance is limited to those key elements of a State-wide plan that will permit a timely, effective response to problems. Within this general framework, it is suggested that the States be permitted maximum discretion in adopting and implementing a plan. Any requirements imposed on the States should be simple and relatively limited so that they can be readily and usefully attained. To be realistic, the State plan should have clear but limited objectives and should be periodically updated and tested.

The details of the plan outlined in the following should be left to the judgement of the State. These limited guidelines should not, however, preclude a State from developing a more extensive plan as time and resources permit. The vulnerability of water supply systems to a particular type of disaster will vary from State to State. For instance, some States are located in earthquake areas, others are located in areas subject to hurricanes. The details of any State plan will depend on local conditions and circumstances. The details of a State-wide plan should be developed within the framework of the following suggested elements.

### State Response

1. Communication - The plan should promote human awareness and a readiness to respond to disaster circumstances. It is essential to appoint a state disaster coordinator and to designate key water supply personnel for call under disaster circumstances. As for local plans, they will require telephone lists, periodic updating, and testing. Where possible, the plan should provide for the use of radio communications when telephones become inoperative.
2. Inventory - The State should maintain current inventories of all public water systems and emergency equipment available and should encourage water utilities to acquire and maintain standardized parts and equipment where economically feasible.

- a. The inventory of public water systems should be continually updated and periodically reviewed and revised. (40 CFR 142.10 (b)(1)).
- b. The State should maintain, to the extent possible, a rough inventory of all appropriate trucking and other equipment that might be made available to solve emergency water supply problems. Possible sources for this equipment would include the military, private firms, public works agencies, and civil defense agencies (a variety of water supply and other equipment is available for emergency use from depots maintained by the Defense Civil Preparedness Agency (DCPA) and others).
  - (1) Available treatment chemicals and emergency equipment including standby power sources and water pumps.
  - (2) Location of the equipment.
  - (3) The mechanism(s) required to obtain the needed equipment.

3. Local plans - The plan should stimulate local activity. The State should encourage local utilities to prepare their own disaster plans. It is important that specific planning for alternate sources be undertaken for the State's larger water utilities. As a practical matter, the State should have such plans on file for five to ten of the larger utilities. Systems serving the largest population at risk should be selected. For each area, alternate water systems should be assessed and selected for availability in the event the basic water system is incapacitated. Factors to be considered in the selection process would include accessibility for tank trucks, the capacity of filling facilities, and the proximity of the alternate system. In addition, the larger utilities should be encouraged to develop their own detailed emergency plans as soon as possible. Ultimately, all community water systems will be expected to adopt a local plan. For such detailed planning at the local level, the AWWA Manual No. M19, Emergency Planning for Water Utility Management, 1973, should prove useful.

4. Coordination - A number of Federal and State Agencies are involved in emergency planning. Many provide assistance unique to their Agency. Many provide assistance only in certain situations and under certain conditions. The Federal Disaster Assistance Administration (FDAA) maintains contact with each Governor's Office and provides financial assessment and assistance when the President designates a disaster area. The Defense Civil Preparedness Agency provides emergency equipment. The Corps of Engineers, U.S. Army, provides certain

types of assistance, primarily during floods. However, the Corps recently proposed regulations (33 CFR Part 214) to provide assistance to communities confronted with a source of contaminated drinking water that presents a threat to the health and welfare of the community. These regulations stem from legislation that was a consequence of the recent Duluth asbestos problem. States also have Civil Defense Agencies providing assistance during emergencies.

The various types of assistance provided by Federal and State Agencies can be a useful element in a State's plan to provide drinking water during emergencies. To effectively utilize this assistance, the State plan should provide for coordination with all the Agencies. The plan should specify the assistance available from each Agency. The State should also determine the conditions and circumstances under which the assistance will be provided and the mechanism that will be required to elicit the response.

5. Public Information - The State plan should include a public information program designed to inform the public on what they can expect and what they can do in the event of an emergency. Public information pamphlets and public service announcements via radio and TV should be utilized to promote public awareness.

### Local Response

Since one of the main State functions is to stimulate preparation of local emergency plans, it seems appropriate to give additional guidance on this subject.

The principal function of a utility plan should be to create a state of human awareness for response and to take steps to ensure water for human survival, if and when a disaster strikes. The AWWA manual No. M 19, should be useful to local utilities in developing their individual plans. Some of the key elements of an adequate local plan are similar to those recommended for the State-wide plan.

1. Communication - Appoint a disaster coordinator and designate a limited number of key operational personnel for call under disaster circumstances. This will require home and office telephone lists. Although it is recognized that such lists are usually out-of-date, they can be useful. Awareness of emergency responsibility can be enhanced by trial activations. Authorities to authorize expenditures during emergencies should be clearly set forth.
2. Alternate Sources - Assess and select alternate water systems that could be made available if the basic water system is incapacitated. Factors to be considered in the selection process would include accessibility for tank trucks, the capacity of filling facilities, and the location of the alternate facility. The assessment should include municipal, private, and other sources for trucks that could carry drinking water

under emergency circumstances. Informal relationships with appropriate sources should be established. Breweries, milk plants, city public works departments, and the U.S. military and National Guard have been sources of water trucks in past emergencies. Formal or informal mutual-aid arrangements should be established with nearby utilities, particularly those selected as alternate systems. Necessary emergency procedures, such as a tank truck disinfection and protection and disinfection of trucked water, should be in writing and readily available.

3. Inventory - The inventory of emergency equipment maintained by the State should provide the basis for each utility to develop a more detailed inventory of equipment that can be made available to that particular utility.