Guidance and Suggested Format For the Development of an Emergency Response Plan

Updated May 2024

Nevada Division of Environmental Protection

Bureau of Safe Drinking Water



Acronym/Abbreviation	Definition	
μg/L	micrograms per liter	
AWWA	American Water Works Association	
BSDW	Bureau of Safe Drinking Water	
BWO	Boil Water Order	
CFR	Code of Federal Regulations	
CFS	Cubic Feet per Second	
CPWS	Community Public Water System	
E. coli	Escherichia coli	
EPA	United States Environmental Protection Agency	
ERP	Emergency Response Plan	
GPM	Gallons per Minute	
IOC	Inorganic Chemicals	
IT	Information Technology	
MCL	Maximum Contaminant Level	
mg/L	Milligrams per liter	
MRDL	Maximum Residual Disinfectant Level	
MGD	Million Gallons per Day	
NAC	Nevada Administrative Code	
NCWS	Non-Community Water System	
NDEP	Nevada Division of Environmental Protection	
NNPH	Northern Nevada Public Health (Formerly WCHD)	
NRS	Nevada Revised Statute	
NTNC	Non-transient/non-community	
O&M	Operations and Maintenance	
OSHA	Occupational Health and Safety Administration	
ОТ	Operational Technology	
ppm	parts per million	
PWS	Public Water System	
SCADA	Supervisory Control and Data Acquisition	
SDWA	Safe Drinking Water Act	
SMCL	Secondary Maximum Contaminant Levels	
SNHD	Southern Nevada Health Department	
SOC	Synthetic Organic Chemicals	
TT	Treatment Technique	
VOC	Volatile Organic Chemicals	
WCHD	Washoe County Health Department (is now Northern Nevada Public Health (NNPH))	



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Introduction

Preparing an Emergency Response Plan (ERP) is an essential part of managing a water system. When faced with an emergency, customers expect you to restore and resume normal operation as soon as possible. An ERP should be a helpful tool to achieve this. A water system's ERP is a "living document", modified based on experience and practical application. It should be reviewed and updated annually or when there is a modification to the system's infrastructure or management.

This "Guidance and Suggested Format for the Development of an Emergency Response Plan" (referred to as ERP Guidance from hereon) is to assist in completing the "Template for the Development of an Emergency Response Plan" (referred to as ERP Template from hereon). The ERP Template is intended to provide a consistent format which can be used by small to medium sized drinking water systems. Both the ERP Guidance and ERP Template (in Microsoft Word) are available from the Nevada Division of Environmental Protection, Bureau of Safe Drinking Water's website: https://ndep.nv.gov/water/drinking-water/forms

How to start your Emergency Response Plan

Begin by reviewing this ERP Guidance, with a goal of completing each section of the "Template" as it pertains to your system. Take your time, break the process down into sections and work through each thoroughly.

Consider the first attempts as draft versions of the ERP. Have others review the draft to see if the plan is clear or needs improvement. Eventually, you will have a completed ERP that can be used for working through a tabletop exercise and guide when an emergency response is warranted.

You are required to add the ERP as an appendix to your Manual of Operations and Maintenance (Manual of O&M) but it can also be a standalone document. This will allow the ERP to be easily accessible as a 'grab & go' document in both hard copy and digital formats, which can be quickly distributed to key personnel for reference during an emergency.

There is a suggested narrative format and example "Hazard Responses" for various events that may result in an emergency included in Section 6. These are intended to assist in developing your own response protocols for the ERP.

ERP Template Guidance and Examples

This ERP Guidance discusses key components for an emergency response with suggested formatting of how you may present information. Every water system, physical setting, and climate will be unique in their potential risks to types of emergencies. Use ERP Guidance as a tool to provide an overview of emergency responses to consider then complete or modify the "ERP Template".

- This Guidance Document discusses key components of operation and maintenance with suggested formatting of how you may present information in your Emergency Response Plan. Use this guidance as a tool to provide an overview of emergency response actions to consider, then complete or modify the "Template".
- The "Template" provides resources to develop your Plan; you should modify them to be specific for your system – add sections, take them out, as appropriate.

- Consistent formatting also aids operators that operate more than one public water system or have experience working elsewhere.
- Consistent formatting also aids emergency responders understand the system and what may be needed.
- Having a ERP in a consistent format assists regulatory agencies conduct their reviews for compliance.
- Tip: In Microsoft Word, 'PDFs' may be inserted as Objects
- Since your ERP may contain sensitive information, make sure to keep it stored in a safe and secure location. At a minimum, it is recommended you have one copy stored on-site, one master digital version, and one off-site to ensure the document is available in the event you are unable to access your offices or facilities. Regardless of a water system size, it should be protected against possible sabotage, terrorism, or vandalism.
- Section 6 Hazard Responses for Specific Events is to include narratives customized to your system and address potential hazards that could directly impact the components of your water system.

When you are done customizing, don't forget to UPDATE the Table of Contents to reflect the page numbers as they have changed based upon your modifications!!

The "ERP Template" provides a format to develop your plan; but you should modify it to be specific to your water system and setting – add sections, take them out, as appropriate.

The following sections provide a format and guidance recommendations to help you develop an ERP for your water system.

The ERP Guidance text and examples will be shown in red. Names, locations, water system references, and businesses used in the examples are fictitious. There is no intention to endorse any businesses used in the examples.

The ERP Template is available for your use to customize and complete in Microsoft Word at the NDEP link: https://ndep.nv.gov/water/drinking-water/forms

This ERP Guidance document and the associated ERP Template have been prepared and periodically updated under the direction of staff of NDEP BSDW. If you have questions or comments, please call the Facility Manager assigned to your water system. The general number for NDEP BSDW is (775) 687-9521. Feedback is beneficial for future updates of this guidance.

Requirements for an Emergency Response Plan

In Nevada, all public water systems are subject to requirements set forth in the Nevada Administrative Code (<u>NAC 445A</u>). For revised regulations that have not yet been codified, please see the <u>BSDW website</u>.

NAC 445A.6588 "Emergency" defined: "Emergency" means a situation in which an unusual calamity, including a flood, fire, storm, earthquake, drought, civil disturbance, accidental spill of a hazardous material or similar occurrence, disrupts the provision of water by a public water system or endangers the quality of water provided by a public water system.

The section specifically pertaining to an Emergency Response Plan states:

NAC 445A.66665 Plan for restoration of services in emergency. (NRS 445A.860): A supplier of water shall:

- 1. Develop an organized plan of predetermined activities for the public water system to restore its services in the contingency that an emergency, including any failure of power, mechanical or electrical failure or natural disaster, reduces the capability of the public water system to supply the water demanded by its customers within its area of service. The plan must include any actions necessary for responding to any breaks in a water main of the public water system.
- 2. Submit a copy of the plan to the Division or the appropriate District Board of Health not later than 18 months after the public water system begins operation.

So, what does that mean and what does it involve?

An ERP assists personnel to respond to a catastrophe, or a civil, mechanical or electrical failure. As the preparer, it's recommended to consult with others familiar with the water system and the area. The ERP should consist of an organized plan of predetermined activities necessary for the system to restore services. Assessing potential emergencies that your water system is more likely to experience can help prioritize your efforts. There are numerous websites that can also assist in identifying the potential hazards and response actions. Some you may consider:

National Weather Service

United States Geological Survey (USGS) Earthquake information

<u>Federal Emergency Management Agency (FEMA) Region 9 – Nevada</u> has information to help prepare for, respond to, and recover from disasters.

Nevada Department of Transportation Road Conditions

<u>State of Nevada Division of Water Resources</u> has information regarding Floodplain Management, Dams, Well Drilling, and water rights.

<u>State of Nevada Division of Environmental Protection</u> has numerous resources pertaining to Air, Water, Land and Environmental Cleanup. NDEP <u>Bureau of Safe Drinking Water (BSDW)</u> has many templates and resources for drinking water systems.

Submitting Manuals Electronically to the Bureau of Safe Drinking Water (BSDW) Engineering Branch

The Manual of Operations and Maintenance, Emergency Response Plan, and/or Cross Connection Control Plan are considered water projects that must be submitted to the BSDW Engineering Branch for review.

Please review the steps below on how to submit the referenced manuals and resubmittals electronically.

Initial Submittals:

Contact the BSDW Project Coordinator via email at ndep-dw-eng@ndep.nv.gov and advise of a new water project. Provide the following information:

- Public Water System (PWS) Name;
- PWS ID Number (if an existing system);
- Project Name; and
- Application for Approval of a Water Project digitally signed by the administrative contact for the water system. The Application can be found on the BSDW website under <u>Engineering</u> <u>Reviews</u>.

The Project Coordinator will reply to your email with a password-protected FTP link to upload the individual documents:

- Manual of Operations and Maintenance
- Emergency Response Plan
- Cross Connection Control
- As well as other documents referenced in the associate appendices

The Project Coordinator will let you know if there are any issues with the document or missing items. Please note that if the submittal is incomplete or contains errors, the project will not move forward in the review queue.

Once the submittal is 100% complete, the Project Coordinator will provide the PWS Administrative Contact of the BSDW-assigned plan review number. Please be sure to include the plan review number in all correspondence with BSDW staff.

How will BSDW issue a comment letter?

If there are any comments on the project, the BSDW Project Coordinator will upload a comment letter to the FTP link. An email will be sent to the PWS Administrative Contact, PWS designated

operator, and PUC (if applicable) to inform them that the comments are available on the FTP website.

Resubmittals:

Do not email resubmittal documents directly to the BSDW Review Engineer.

Upload resubmittal documents to the previously provided FTP link. Upload all revised documents in the same format as the initial submittal. Email the BSDW Project Coordinator at ndep-dw-eng@ndep.nv.gov advising that you have uploaded the documents. In the email, please provide the following information:

- PWS Name;
- PWS ID Number;
- BSDW Plan Review Number; and
- Project Name

Regardless of how minor the change to a document is, all revised documents must be complete and not contain any omitted plan sheets and/or pages.

How will BSDW issue a water project approval letter?

To be consistent with electronic review, BSDW will issue an electronic version of the approval letter via email.



Section 1: System Information – The Basics

The system information and mapping should be the same as in the Manual of O&M, so there is duplication, but as described earlier, the ERP is intended to be a "grab and go" document when needed.

1.1 System and Contact Information

To easily identify the system, provide the system identification number, system name and address, and other specific identifiers like city, location, population, and the number of service connections.

System Number or Reference (SDWIS ID)	
	PWS ID# NV000XXXX
Identify the type of System:	Community
Community (C)	
Non-Transient Non-Community (NTNC)	
Transient Non-Community (TNC)	
Distribution Classification Required (D1, D2,	D1
etc.)	
,	DA DIVISION OF
Treatment Classification Required	T1
(T1, T2, etc.)	/IDONIA ENITA I
	y ikunmen lal
System Name and Address	Nevada Water System
	DTECTION
Location/Town	Rural Nevada
Population Served and Service Connections	Population: 200
	Connections
	No. of Residential Connections:80
	No. of Commercial Connections:0
	No. of Other Connections:0
System Owner	Nevada Public Water System
Seasonal Operation? Operational dates?	Year-round operation

Name, Title, and Contact info for Person	Name: John Doe	
Responsible for Maintaining & Updating the	Title: Operator	
Emergency Response Plan	Phone: (775) ###-####	
	Cell: (775) ###-###	
	Email: email@email.com	

1.2 Service Area Map or Vicinity Map

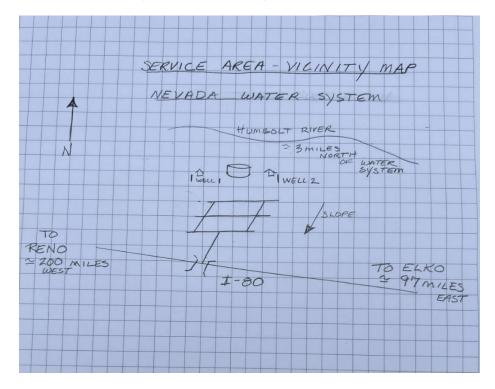
Please include or insert a drawing or attachment that shows the relationship of your system to other nearby communities within the general area to locate and orient your system for reference. Larger maps or schematics can be attached as an appendix with the location referenced in this section.

Service Area / Vicinity Map

For the map of the system service area, consider a single page view or as a fold-out, illustrating primary roadways, geological features such as lakes, rivers or drainages, or other defining properties. For a very small system, a simple graphic in this text box may be sufficient. However, typically larger maps or schematics can be attached as an appendix with the location referenced in this section of the ERP.

(This basic vicinity map is of a fictitious water system

being used as an example for illustration)



1.3 System Overview

Provide a brief narrative overview of the System/Facilities – Describe how the infrastructure components are connected: water sources, treatment, pumps, transmission and distribution system, storage facilities, and other features that would distinguish your system. A consolidated list of primary components and their functions will help to organize system information and allow for timely identification of potential issues.

System/Facilities

Example: "Nevada Water System" a community water system, relies on two groundwater wells for supply. Well #1 is equipped with a submersible pump and has a capacity of 50 GPM. There is a cinder block well house adjacent. In the well house, there is a meter, logbook, and LMI pump used to inject sodium hypochlorite from a 50-gallon drum. It is considered the primary well to meet demand.

Well #2 is also equipped with a submersible pump with capacity of 40 GPM. The water exceeds the secondary standard for iron (0.6 mg/L) therefore, the water is treated with a Green Sand Filter to reduce the iron concentration, prior to chlorination. The green sand filter and chlorination equipment are housed in a cinder block well house adjacent to well #2.

There is one 500,000-gallon, bolted steel water tank located at an elevation of 4315 feet. The tank is located on the north side of the service area. It is equipped with high level switches to prevent overfilling and a low-level switch to send a signal to Well #1 to come on. When the demand increases and the tank level drops, a signal is sent to Well #2 to come on. The local fire authority has required a fire flow storage of 120,000 gallons.

The homes within the service area vary in elevation resulting in water pressures in the distribution system ranging from 50 psi to 95 psi.

The distribution piping is principally 10", 8", and 6" PVC C900 piping. Isolation valves are located at most fittings. Each residence is metered with remote read capability. Fire hydrants are located throughout the subdivision approx. 400' apart. The topography is such there are high points equipped with air/vac assemblies and low points are equipped with flush assemblies.

Simplified Graphic and Flow of the Water System

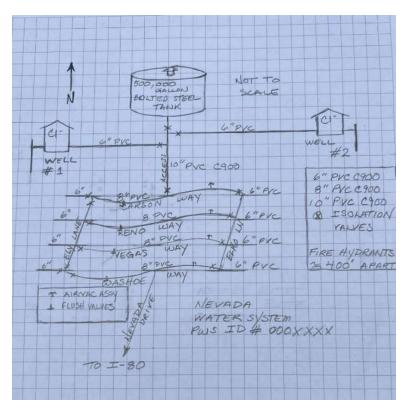
For a very small system, a simple graphic in this text box may be sufficient. However, many systems may have maps or schematics 11"x14" or greater providing a general layout of system components. These can be attached as an appendix with the location referenced in this section of the ERP.

Key components include the water sources, storage, treatment, pumps, and distribution. Other appurtenances to emphasize are isolation valves and other controls needed for quick access during emergencies.

Consider descriptions that include ties to larger geological features such as drainages, mountains, and riverine ecosystems.

Flow: The wells pump into the storage tank or directly into the looped distribution system.

(This basic schematic is of a fictitious water system being used as an example for illustration)



Section 2: Chain of Command

The first awareness of a potential emergency is likely to be called in by another agency or member of the public. Identify the number that is publicized and provided to agencies. Whoever answers that call, will have the responsibility to document and make the first internal calls to inform the designated responsible person.

Water System Contact to Report of Emergency

Phone Business Hours	Phone After Hours	Website Contact Email	
(775) xxx-xxxx	(775) xxx-xxxx	Email@email.com	

For the purposes of this guidance, it is assumed the initial call will go to the Owner/manager, who will in turn contact the designated Operator, and then advise the regulatory authority. Each water system must identify the initial response team contacts and sequence depending upon the management and size of the system. Administrative staff are valuable in documenting staff time, requisitions, and expenditures.

2.1 Water System Contacts and Documents

2.1.1 Owner/Manager/Director

Name, Title	Phone After Hours		Email
John Doe, Manager	(775) *** ****	ORIAA F	

2.1.2 System Operators and Certifications

Name, Title	Distribution Grade	Treatment Grade	Phone
John Doe, Designated Operator	D1	T1	(775)

2.1.3 Managerial & Administrative Contacts:

	Contact Name	Title	Phone	Email
Staff/On-Call	John Doe, P.E.	Engineer	(775)	email@email.com
Engineer				
Administrative	John Doe	Manager/Accounting	(775)	email@email.com
Contact				
Public Information	John Doe	Spokesperson	(775)	email@email.com
Officer				
Financial Contact				
Legal Contact				
Other				

2.1.4 Location of documents needed during an emergency.

Document	Physical Location	Digital Location	Duplication
Customer contact list	No physical list	Acct Computer C:/accounts/contacts	Drop box/acct file
		C./accounts/contacts	



Section 3: Notification

3.1 Local Emergency Response and Mitigation

Police	911
Police (non-emergency)	(xxx) xxx-xxxx
Fire	911
Fire (non-emergency)	(xxx) xxx-xxxx
Hazmat	(xxx) xxx-xxxx
NDEP Spill Hotline	(775) 687-9485
Others?	

3.2 Regulatory Agencies and Contacts

NDEP BSDW	General Phone		
		Website	
BSDW Front	(775) 687-9521	https://ndep.nv.gov/water/drinking-water	
Desk		IENVIROR	
All contacts		Bureau of Safe Drinking Water	er Contacts NDEP (nv.gov)
for BSDW		PROTECTION	
Contact Title	Name	Email	Phone
BSDW	John Doe	doe@NDEP.nv.gov	(775) 687-
Facility			
Manager			
Health			
District			
Facility			
Manager (if			
applicable)			

Section 4: Effective Communication

Communication with staff, customers, the news media, and the public is a critical part of emergency response. It is important to recognize that staff and their families may be impacted by the emergency as well. Staff may not be effective or available if their homes or family are at risk of being harmed. Strategies to provide employee coverage or safety may need to be developed.

When emergencies arise, it is stressful and mixed messages can complicate and confuse the situation. Therefore, designate a spokesperson as the primary utility contact. The spokesperson should collaborate with others, to develop the desired key messaging about the emergency. Small water systems may not have experienced staff, but the designated spokesperson should strive to remain calm and convey the facts concisely. An alternate spokesperson should also be identified and will be especially needed during a multiple day emergency. Field staff should be able to direct people (residents, reporters, etc.) with questions to the designated spokesperson.

The spokesperson will be responsible for communicating updates for ongoing emergency events, response and recovery actions, and estimated time requirements before returning the system to normal operations. Spokespersons may also need to collaborate with local, State, and Federal agencies and communicate loss of water service with priority water users such as hospitals and schools.

4.1 Designate a Spokesperson

Designate one person to be responsible for communicating the details of emergency events to customers, priority customers, and media.

Spokesperson	Phone	
Name		Email
John Doe (Primary)	(775) XXX-XXXX	
Jane Doe (Secondary)	(775) XXX-XXXX	

Preparing for emergency communications:

Do:

- Develop concise key messages,
- Provide complete, accurate, and timely information,
- Acknowledge uncertainty and offer to get back with more information later, and
- Document your communications.

Do not:

- Speculate on the cause or outcome of an incident,
- Blame or debate,
- Minimize or brush off concerns of customers, or
- Treat inquiries from interested parties as an annoying distraction from the real business of emergency response.

4.3 Priority Customer Contact List:

Agency/Organization	Name and Position	Contact Info
Hospital/Clinic		
Schools		
Convalescent Hospitals or Similar		
Health Compromised Customers		

4.4 Media Contact List: NEVADA DIVISION OF

Agency/Organization	Name and Position	Contact Info
Local Newspaper	DDOTEC	TION I AL
Local Radio Station	PROTEC	HON
Local TV Station		

4.5 Notification Types:

When it comes to water quality impacts, there are different types of required minimum notifications depending upon the potential degree of hazard.

Tier 1 - Notify within 24 hours. Any time a situation occurs where there is the potential for human health to be immediately impacted, water suppliers have 24 hours to notify the public of the situation. Water suppliers must use media outlets such as television, radio, and newspapers, post their notice in public places, or personally deliver a notice to their customers in these situations.

Tier 1 violations are:

- E. coli MCL violations; failure to test for E. coli.
- Nitrate/Nitrite MCL violation; failure to take confirmation.
- Chlorine Dioxide MRDL violation; failure to take repeat.

- Exceedance of maximum turbidity level, where NDEP BSDW determines Tier 1 is required.
- Nitrate exceedances for NCWS allowed to exceed standard.
- Waterborne disease outbreak or another waterborne emergency
- Other situations as determined by the NDEP BSDW

Tier 2 - Notify as soon as possible, but within 30 days of the violation. Any time a water system provides water with levels of a contaminant that exceed EPA or state standards or that has not been treated properly, but that does not pose an immediate risk to human health, the water system must notify its customers as soon as possible, and no later than, within 30 days of the violation. Notice may be provided via the media, posting, or through the mail.

Tier 2 violations are:

- All other MCL, MRDL, and TT violations that are not Tier 1.
- Monitoring and testing procedure violations, where NDEP BSDW requires a Tier 2 (rather than Tier 3) notice.
- Failure to comply with variance and exemption (V&E) conditions

Tier 3 - Notify within one year of the violation. When water systems violate a drinking water standard that does not have a direct impact on human health (for example, failing to take a required sample on time) the water supplier has up to one year to provide notice of this situation to its customers. The extra time gives water suppliers the opportunity to consolidate these notices and send them with annual water quality reports (consumer confidence reports).

Tier 3 violations are:

- All other monitoring or testing procedure violations not already requiring a tier 1 or tier 2 notice.
- Operation under a Variance or Exemption
- Special public notices:
 - Exceedance of Fluoride SMCL
 - o Announcing the availability of unregulated monitoring results

Notification Resources:

Boil Water Orders are available at <u>Do Not Drink & Boil Water Orders | NDEP (nv.gov)</u> and include:

- E. coli Present samples
 - Precautionary Boil Water Order Public Notice
 - Official Boil Water Order Public Notice English
 - Official Boil Water Order Public Notice Spanish
- Other Boil Water Order Events Boil Water Rescind Notice
 - o Precautionary Boil Water Order Guidance for Public Water Systems
 - Loss of Pressure Boil Water Order Public Notice
 - Boil Water Order Rescind Notice Template
- Do Not Drink Orders

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- o Nitrate Public Notice Template
- Unknown Water Quality Public Notice Template
- o Do Not Drink Notice Rescind Template



Section 5: Resources for Response to Emergency Events

5.1 Service Contact List:

Agency/Organization	Name and Position	Contact Info
Engineering Firm	SGA Engineers	John Doe, P.E. (775) *** ****
Electric Utility	E Energy	John Doe
Gas/Propane Supplier	Gobane Gas	
Phone Providers	MCI	
Chlorine/ Other Chemical Supplier	Place Chemicals	
Rental Equipment. Supplier	Place Rentals	

5.2 Laboratories

Name	Address	Phone	Lab Capabilities
Nevada State Health	1660 N. Virginia St.	Daytime: (775) 688-	Coliform and
Lab	Reno, NV 89503	1335	Inorganic
		Emergency: Same	

5.3 Suppliers and Vendors

	Name	Phone
Pipe Supply	Eastern Nevada	(775)
Chemicals	B-#4 Chemical	(775)
Pumps / Motors	Esmeralda Seal & Pump	(775)
Safety	Brainger Industrial Supply	(800)
Others?		

5.4 Contractors / Repair Services

	Name	Phone / Emergency Phone
Pipe Repairs	A&D Construction	(775)
Electrician	JB Electric	(775)

Plumber	Best Service Plumbing	(775)
Well Driller	Pleasant Valley Water Well Services	(775)
SCADA.	ControlPoint Engineering	(916)
Tank Divers	Conrady Consultant Services	(205)
Others?		

5.5 Emergency Equipment, Safety Materials, and Spare Parts

All utility personnel should know the location of all equipment and safety materials needed during emergencies. Inventory should be recorded and restocked as supplies are depleted. A spare parts inventory must be maintained in your Manual of O&M. Ideally, your utility should maintain a single web based Spare Parts Inventory that could be easily referenced and updated.

Item(s)	Location	Amount Available in Stock	Restock Date
PPE (hard hats, gloves, flashlights, safety glasses, coveralls)	Ex. Maintenance Room	Ex. Box of hard hats, box of gloves, five safety glasses	Xx/xx/20XX
Flares	NEVAD/	DIVISION OF	
Traffic Cones	ENV	IRONME	NTAL
Pagers/ Walkie- Talkies (alternative communication)	PRO	TECTION	
Batteries			
Chlorine			

5.6 Detection and Mitigation Strategies

Detection strategies can help prevent, detect, and minimize the severity of line breaks, loss of power, mechanical failures, natural disasters, or malevolent acts. Preventative actions are generally preferable to reactive responses to emergency events because they save time and resources and limit potential exposures to hazards. With time, experience, and events, you may identify additional means to detect and/or mitigate a potential problem. If implemented, the practice should be added to your routine Manual of Operations and Maintenance.

Section 6: Hazard Responses for Specific Events

6.1 Core Response

The core response is required of all systems. These are the events likely to occur at any system and should be updated accordingly. These include water main breaks, power outages, mechanical failures, weather related impacts, accidental or intentional malevolent acts that adversely affect the ability to produce or deliver water that meets requirements.

For any emergency event, there are a series of general steps to take:

- Analyze the type and severity of the emergency
- Take immediate actions to save lives
- Take action to reduce injuries and system damage
- Report to appropriate management staff and regulatory representatives
- Initiate response actions
- Prepare key messages to notify customers and media
- Make repairs based on priority demand
- Coordinate with regulatory agencies, when cleared, return the system to normal operation
- Notify customers and media
- Post emergency review these have a threefold purpose. They provide an opportunity for
 everyone involved in an event to: 1) identify areas in the current emergency response plan
 that need improvement; 2) make recommendations to improve it; and 3) debrief and capture
 key lessons learned.

6.1.1 Event Impacts

Your water system may be more vulnerable to one or the other, due to locale, climate, or geology. For each type of event, there is a potential impact on your water system components.

Consider the potential water system impacts:

Wells

- Ground water contamination
- Pump or power failure
- Vandalism
- Natural disasters; floods, earthquakes
- Declining yield/water levels

Water Treatment

- Surface water impacts from high turbidity or drought
- Power failure
- Natural disasters; floods, earthquakes
- Chemical spill
- Treatment mechanical failure

Storage Tanks

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- Natural disasters; earthquakes, deep snow, ice, high winds
- Vandalism

Distribution System

- Water main breaks
- Low pressure
- Water conservation/ rationing programs
- Backflow events
- Pump stations mechanical or power failures
- Pressure reducing valves failure causing high pressures

Other infrastructure

- Pump houses impacts from natural disasters
- Chlorination system failures
- Offices, warehouses, maintenance buildings
- Computer systems, cyber-attacks
- · Access roads impeded by heavy, deep snow or washed out by flooding





Consider using this worksheet to identify applicable events that may cause emergencies and how these events may impact each component of your water system. For each impact directly affecting a water system component, a Hazard Response must be prepared specific to your system and included in Section 6 of the ERP. A suggested format is provided and included in Section 6 – Response Actions to Specific Events.

Event	Water Source & Treatment	Treatment & Disinfection	Pump Stations	Storage Tanks	Distribution, System PRVs
Distribution Line Break	☐ Directly ☐ Indirectly ☐ Not Applicable				
Loss of Power	☐ Directly ☐ Indirectly ☐ Not Applicable				
Drought	☐ Directly ☐ Indirectly ☐ Not Applicable				
Earthquake	☐ Directly ☐ Indirectly ☐ Not Applicable				
High Winds	☐ Directly ☐ Indirectly ☐ Not Applicable				
Flood	☐ Directly ☐ Indirectly ☐ Not Applicable				
Extended Freezing Temperatures	☐ Directly ☐ Indirectly ☐ Not Applicable				
Deep or Heavy Snow	☐ Directly ☐ Indirectly ☐ Not Applicable	☐ Directly ☐ Indirectly	☐ Directly ☐ Indirectly ☐ Not Applicable	☐ Directly ☐ Indirectly ☐ Not Applicable	☐ Directly ☐ Indirectly ☐ Not Applicable

Guidance and Suggested Format for the Development of an Emergency Response Plan

Fire / Wildfire	☐ Directly	☐ Directly	☐ Directly	☐ Directly	☐ Directly
	☐ Indirectly	☐ Indirectly	☐ Indirectly	☐ Indirectly	☐ Indirectly
	☐ Not Applicable	☐ Not Applicable	☐ Not Applicable	☐ Not Applicable	☐ Not Applicable
Epidemic/Pandemic	☐ Directly	☐ Directly	☐ Directly	☐ Directly	☐ Directly
	☐ Indirectly	☐ Indirectly	☐ Indirectly	☐ Indirectly	☐ Indirectly
	☐ Not Applicable	☐ Not Applicable	☐ Not Applicable	☐ Not Applicable	☐ Not Applicable
Hazardous	\square Directly	□ Directly	☐ Directly	☐ Directly	☐ Directly
Materials	\square Indirectly	☐ Indirectly	☐ Indirectly	☐ Indirectly	☐ Indirectly
	☐ Not Applicable	☐ Not Applicable	☐ Not Applicable	☐ Not Applicable	☐ Not Applicable
Cyber Attack /	\square Directly	□ Directly	☐ Directly	☐ Directly	☐ Directly
Terroristic Threat	☐ Indirectly	☐ Indirectly	☐ Indirectly	☐ Indirectly	☐ Indirectly
	☐ Not Applicable	☐ Not Applicable	☐ Not Applicable	☐ Not Applicable	☐ Not Applicable
Vandalism/	☐ Directly	☐ Directly	☐ Directly	☐ Directly	☐ Directly
Security Threat	☐ Indirectly	☐ Ind <mark>i</mark> rectly	☐ Indirectly	☐ Indirectly	☐ Indirectly
	☐ Not Applicable	☐ No <mark>t</mark> Applicable	☐ Not Applicable	☐ Not Applicable	☐ Not Applicable
Pump Failures	☐ Directly	☐ Directly	☐ Directly	☐ Directly	☐ Directly
·	☐ Indirectly	☐ Ind <mark>irectly</mark>	☐ Indirectly	☐ Indirectly	☐ Indirectly
	☐ Not Applicable	☐ Not Applicable	☐ Not Applicable	☐ Not Applicable	☐ Not Applicable
(Other)	\square Directly	☐ Directly	☐ Directly	☐ Directly	☐ Directly
	\square Indirectly	☐ Indirectly	☐ Indirectly	☐ Indirectly	☐ Indirectly
	☐ Not Applicable	☐ Not Applicable	☐ Not Applicable	☐ Not Applicable	☐ Not Applicable

The following table is provided as a format for a Hazard Response narrative describing a potential event and actions. **COPY FORMAT AND ADD AS MANY EVENTS AS NECESSARY**

Nature of the Event/Emergency	Basically, what is the emergency.
Assess the Immediate Emergency	Describe the conditions, what is going on and the potential aspects to prepare for.
Immediate Actions	Identify actions to mitigate the emergency and contend with potential or impending conditions
to the entire system	It is important to evaluate the potential impacts of the emergency event on other components of the system, as this may result in the need for additional emergency measures.
Notifications	Identify the notifications that will be needed for the various emergency events.
	Identify the mitigations in place to avert the emergency. Will these be sufficient? Do they need to be updated? This is particularly important to review after an emergency event.
Follow-up Actions	 Some things can be said over and over again! Verify your equipment and safety devices are reset and ready for proper operation. Conduct a post emergency review. Update ERP as needed

Examples of several specific events have been provided. Narratives for the identified hazards, how they may impact your system's components, and your system's response must be prepared and included in Section 6 of your ERP. All information should be customized to reflect your system's needs. Templates for common water system emergencies are provided. In the event any of these do not apply to your system, please note it is not applicable. Consider providing a rationale as to why it does not apply to your system.

6.2 Water Main Break

Nature of the	Evidence of a Water Main Break reported.
Event/Emergency	'
Assess the	What steps will the person onsite take to determine what the first actions
Immediate Emergency	should be?
	Determine severity and type of break. Is it in the street section? Is the leaking water causing a hazard for vehicles driving through? If so, traffic control must be put into place. Is the line break flowing like a geyser or seeping? Is it night or will the repair go into the night? Identify the location of the nearest shut-off valves to isolate the section of pipe with the line break.
Assess impacts to the entire system	Check storage levels. Depending upon the line size, much of the stored water could be depleted.
for secondary	Check water pressures in the system.
impacts (Water	Has any segment of the distribution system had a loss of all pressure?
source, pumping systems, storage,	 Is there any evidence of cross connection back siphonage or back pressure?
distribution	These conditions could lead to the need of secondary emergency
components)	responses.
	PROTECTION
Immediate Actions	Provide appropriate traffic control to protect the public and employees. Coordinate Crews/Contractor to repair pipe, as needed. Line up construction lighting if the work is going into the night.
	Use your emergency disinfection plan or AWWA Standard C651 (most
	current version) and consult with the Bureau of Safe Drinking Water. The
	following is language from the standard AWWA procedures.
	a) For controlled, pressurized breaks
	i) Excavate below break.
	ii) Disinfect exterior of pipe.
	iii) Repair while pressurized.
	iv) Backfill and compact.
	v) Sample for hacteriological contamination
	v) Sample for bacteriological contamination. b) For controlled break with loss of pressure (possible)
	 v) Sample for bacteriological contamination. b) For controlled break with loss of pressure (possible contamination)
	b) For controlled break with loss of pressure (possible
	b) For controlled break with loss of pressure (possible contamination)

	iii) Test for bacteriological contamination
	iv) Follow steps ii and iii above.
	v) Repair pipe
	vi) Flush pipe (3 ft/sec to scour)
	vii) Disinfect. (Refer to AWWA Standard C651)
	viii) Flush
	ix) Test for residual and bacteriological contamination
	x) Return to service and notify customers.
	c) For catastrophic break
	 i) Notify customers of water outage and issue appropriate advisory.
	ii) Sample for bacteriological contamination.
	iii) Excavate below break.
	iv) Isolate appropriate section of pipe.
	v) Repair pipe.
	vi) Flush pipe (3 ft/sec to scour)
	vii) Disinfect (Refer to AWWA Standard C651)
	viii) Flush
	ix) Test for residual and bacteriological contamination
	x) Return to service and notify customers.
	,
Notifications	Notify NDEP BSDW at the outset of the event, during to update if any
	conditions change, then again, when the emergency has been mitigated
	and ready to return to normal operations.
	Notify impacted customers per NDEP requirements.
	Follow-up with the media
	Tollow-up with the modia
Mitigations	Review existing mitigations. Were they effective? Could they be improved
	upon? How? Are there improvements that could be easily added or must
	you wait for budgeting?
Follow-up Actions	Verify your equipment and safety devices are reset and ready for proper
	operation.
	Conduct a post emergency review.
	Update ERP as needed

6.3 Loss of Power

Nature of the Event/Emergency	Regional power outage due to a blown transformer or other cause.
Assess the Immediate Emergency	Verify power is out at the wells. No water production until power is restored unless back-up generator or alternative source of power can be applied.
Immediate Actions	 Communicate with the power company to get an estimate of how long the outage is expected to last. Verify storage quantity. Based upon typical consumption, estimate how long the stored water (over and above the fire flow quantity) will last.
Assess impacts to the entire system for secondary impacts (Water source, pumping systems, storage, distribution components)	 Check the availability of alternative water supplies such as bottled water. If there is risk of the storage water level dropping below the required fire flow quantity, notify the fire authority. When power supply is restored, confirm wells pumps, treatment equipment, and distribution pumps are functioning. Some electrical components may need to be reset. Check water pressures in the system. If pressures fall below 20 psi follow the procedures outlined in the Water Main Break Hazard Response.
Notifications	 Notify NDEP BSDW at the outset of the event, during if any conditions change, then again when the emergency has been mitigated and ready to return to normal operations. When notifying electrical utility provider – let them know that a public water system is experiencing an outage. Notify customers of the outage and expected return to service. Notify customers and media of the need to cut unnecessary water usage (such as lawn watering) to reserve water for critical usage. Customer notifications may be hindered by the regional power outage. Multiple means of communication should be used, including the media. If there is risk of the storage water level dropping below the required fire flow quantity, notify the fire authority. Notify customers and the media when power is restored and it is safe to resume normal water usage.
Mitigations	Review existing mitigations. Do you think they are sufficient? After an emergency event, look back; were they effective? Could they be improved

	upon? How? Are they improvements that could be easily added or must you wait for budgeting?
Follow-up Actions	 Verify your equipment and safety devices are reset and ready for proper operation. Conduct a post emergency review. Update ERP as needed.



6.4 Mechanical Failure

Nature of the Event/Emergency	Well Pump Failure.
Assess the Immediate Emergency	Confirm there is power to the pump.
Immediate Actions	 Attempt to start the pump by hand. Review system controls for possible source of malfunction. Contact plumbing or electrical contractor as needed for repairs. Contact pump supplier as needed for repairs.
Assess impacts to the entire system for secondary impacts (Water source, pumping systems, storage, distribution components)	Check water storage quantity. Verify other water sources are functioning. Assuming the well pump will be out of service for several days, estimate the demand for water by the customers.
Notifications	 Notify NDEP BSDW at the outset of the event, during if any conditions change, then again when the emergency has been mitigated and ready to return to normal operations. Notify customers and media of the need to cut unnecessary water usage (such as lawn watering) to reserve water for critical usage. Customer notifications may be hindered by the regional power outage. Multiple means of communication should be used, including the media. If there is risk of the storage water level dropping below the required fire flow quantity, notify the fire authority. Notify customers and the media when power is restored, and it is safe to resume normal water usage.
Mitigations	Review existing mitigations. Were they effective? Could they be improved upon? How? Are they improvements that could be easily added or must you wait for budgeting?
Follow-up Actions	 Verify your equipment and safety devices are reset and ready for proper operation. Conduct a post emergency review. Update ERP as needed.

6.5 Hazards Resulting from Accidental or Malicious Events

When it comes to emergency preparedness for a water system, it's critical to consider the possibility of man-made calamities, such as hazardous material spills, vandalism, cyber-attacks, and other malicious actions. These events can have severe consequences on the safety and reliability of the system, as well as the health and well-being of those who rely on it. Therefore, it's essential to have a robust emergency response plan in place that accounts for these potential scenarios and outlines specific procedures for mitigating their impacts. Your Hazard Response for these emergencies will assist in minimizing damage, protect public health and safety.

6.5.1 Hazardous Materials

Nature of the Event/Emergency	An adjoining property has discovered an underground storage tank of fuel that has been leaking for an undetermined period.	
Assess the Immediate Emergency	It is not known if the nearest well has been impacted. Sampling will need to be conducted to determine if the water has already been impacted.	
Immediate Actions	Isolate the well from the distribution system. Properly collect samples for Total Petroleum Hydrocarbon (TPH) analysis or other recommended analysis that will screen for the potential contaminants.	
Assess impacts to the entire system for secondary impacts (Water source, pumping systems, storage, distribution components)	Check the storage tank using caution. If there has been hydrocarbon contamination, the volatiles could be releasing in the air space. A sheen may also be visible on the surface. This would warrant isolation of the tank as well. If the tank has been impacted, it may need to be drained and cleaned before returning to service.	
Notifications	 Notify NDEP BSDW initially, and during if any conditions change, then again when the emergency has been mitigated and ready to return to normal operations. If the well or tank shows evidence of contamination, notify customers and the media that the facilities have been taken offline. If water delivery is necessary, identify how it will be delivered and in what quantity. When fully confirmed the well and tank are safe to bring back into service, notify customers and the media. 	

Mitigations	 Review existing mitigations. Will they be effective? Could they be improved upon? How? Are they improvements that could be easily added or wait for budgeting? If the well is not affected, consider groundwater flow modeling to estimate the contaminant flow path and lead time. Consider implementing a Wellhead Protection Program or Source Water Assessment Plan. Learn of the remediation plans of neighboring properties.
Follow-up Actions	 Inspect all equipment and safety devices for proper operation. Conduct a post emergency review. Update ERP as needed.



6.6.2 Vandalism / Security Threat

Nature of the Event/Emergency	The storage tank gate, ladder access and access hatch are open. Locks have been cut.		
Assess the Immediate Emergency	Other than the access being open, there is no visible evidence of contamination. No unusual odors. Could be teens going for a swim, or someone wanting to cause harm to the people. Be very vigilant and cautious.		
Immediate Actions	Isolate the tank from the distribution system and at a minimum, collect samples for bacterial analysis.		
Assess impacts to the entire system for secondary impacts (Water source, pumping systems, storage, distribution components)	Check other facilities for vandalism. NEVADA DIVISION OF		
Notifications	 Notify NDEP BSDW initially, and during if any conditions change, then again when the emergency has been mitigated and ready to return to normal operations. Notify customers and the media that the tank has been taken offline. If water delivery is necessary, identify how it will be delivered and in what quantity. Notify customers of the planned course of action to disinfect the tank per AWWA standards. When fully confirmed the tank is safe to bring back into service, notify the customers and the media. 		
Mitigations	Review existing mitigations. Were they effective? Could they be improved upon? How? Are they improvements that could be easily added or must you wait for budgeting? Consider adding security cameras or electronic lock detection.		
Follow-up Actions	 Inspect all equipment and safety devices for proper operation. Conduct a post emergency review. Update ERP as needed. 		

6.6.3 Cyber Security Breach

Cybersecurity is an increasing hazard for utilities. More and more utilities are the target of ransomware or facility disruption. You may think a small water system in rural Nevada would not be at risk. There is always the risk of a disgruntled employee or hacker starting small looking to go big.

Nature of the Event/Emergency	Chlorination remotely turned up resulting in excessive residual levels at 5 mg/l.	
Assess the Immediate Emergency	A hacker logged into the SCADA system, increased the chlorine injection to high levels, then deleted programming.	
Immediate Actions	Reinstall programs, load back-ups and change passwords. Reset chlorinator manually. Initiate chlorine residual monitoring throughout the distribution system. Prepare key messaging for media and customers.	
Assess impacts to the entire system for secondary impacts (Water source, pumping systems, storage, distribution components)	Check other connected facilities for proper operation including office computers.	
Notifications	 Notify NDEP BSDW initially, and during if any conditions change, then again when the emergency has been mitigated and ready to return to normal operations. Notify customers and the media of the event and actions being taken. While chlorine residuals at those levels should not pose serious health effects, short term exposure may cause minor irritation to eyes, nose, or throat particularly for those with asthma. Suggest flushing their household lines to sinks in open areas rather than confined spaces like bathrooms. When fully confirmed the chlorine residuals have returned to expected levels, notify the customers and the media and return to normal operations. Report the incident to the Federal Bureau of Investigations (FBI) or Cybersecurity and Infrastructure Security Agency (CISA) or to the US EPA 	

Mitigations	Review existing mitigations. Will they be effective? Could they be improved upon? How? Are they improvements that could be easily added or must you wait for budgeting? When it comes to cybersecurity, a small water system may be at greater risk. Is there a single point of contact responsible for cyber activities for information technology (IT) and operational technology (OT)? Do you have a Cybersecurity Policy that addresses Remote Access, Access Control, Data Protection or Acceptable Use? The USEPA has created a Cybersecurity Self-Assessment Tool for public water systems. This may assist in identifying gaps in your cybersecurity.
Follow-up Actions	Conduct a post emergency review.Update ERP as needed.



6.6 Natural Disasters

There are many natural disasters that can impact your water system facilities. An event may impact facilities in multiple ways.

6.6.1 Drought

Nature of the Event/Emergency	Drought – lack of recharge	
Assess the Immediate Emergency	Well water levels dropping	
Immediate Actions	Call in a well driller to deepen the well (or intake level in the case of surface water).	
Assess impacts to the entire system for secondary impacts (Water source, pumping systems, storage, distribution components)	Deepening the well may result in a change in water quality. Testing will be necessary. Consulting with a hydrogeologist may be warranted to identify alternative depth or aquifer.	
Notifications	 Notify NDEP BSDW initially, and during if any conditions change, then again when the emergency has been mitigated and ready to return to normal operations. Seek permitting through Division of Water Resources for well deepening. Notify customers and the media of the need to cut unnecessary water usage (such as lawn watering) to reserve water for critical usage. Notify customers and the media of any changes in water resources or need for treatment. 	
Mitigations	Review existing mitigations. Were they effective? Could they be improved upon? How? Are they improvements that could be easily added or must you wait for budgeting?	
Follow-up Actions	 Inspect all equipment and safety devices for proper operation. Conduct a post emergency review. Update ERP as needed. 	

6.6.2 Earthquake

Clearly a major earthquake near the epicenter may have significant impacts on the water system. However, earthquakes miles away can have an impact on your system depending upon soils and geology. Check your system for impacts such as: cracks, shifts in foundations, change in water quality or line breaks.

Nature of the Event/Emergency	Earthquake.	
Assess the Immediate Emergency	6" PVC water line break.	
Immediate Actions	See 6.2 Water Main Break.	
Assess impacts to the entire system for secondary impacts (Water source, pumping systems, storage, distribution components)	 Inspect well and pump house for any damage to the structures, chlorinator or treatment facilities. Check storage tank and foundation for any visible damage. Check office, maintenance shop and other structures for damage. Check distribution system for any other breaks or damage. 	
Notifications	 Notify NDEP BSDW initially, and during if any conditions change, then again when the emergency has been mitigated and ready to return to normal operations. Notify impacted customers per NDEP BSDW requirements. Follow-up with the media 	
Mitigations	Review existing mitigations. Were they effective? Could they be improved upon? How? Are they improvements that could be easily added or must you wait for budgeting?	
Follow-up Actions	 Inspect all equipment and safety devices for proper operation. Conduct a post emergency review. Update ERP as needed. 	

6.6.3 High Winds

Nature of the Event/Emergency	High winds causing a dust storm.	
Assess the Immediate Emergency	Dust and debris impacting vents on the storage tank.	
Immediate Actions	Isolate the tank from the system. When safe, inspect the extent of impact and collect water samples to be analyzed for bacterial contamination. Chlorinate per AWWA C652 standards.	
Assess impacts to the entire system for secondary impacts (Water source, pumping systems, storage, distribution components)	High winds and dust may impact other water system facilities. Inspect buildings to verify integrity. Check mechanical and electrical facilities that may be adversely impacted by fine dust.	
Notifications	 Notify NDEP BSDW initially, and during if any conditions change, then again when the emergency has been mitigated and ready to return to normal operations. Notify customers and the media of the event and ramifications. Bottled water will be supplied until such time as the storage tank is confirmed clean and bacteriologically absent of contamination. 	
Mitigations	Review existing mitigations. Were they effective? Could they be improved upon? How? Are they improvements that could be easily added or must you wait for budgeting?	
Follow-up Actions	 Inspect all equipment and safety devices for proper operation. Conduct a post emergency review. Update ERP as needed. 	

6.5.4 Flood

Nature of the Event/Emergency	Rising flood waters impacting the well and pump house.	
Assess the Immediate Emergency	Flood water entering the casing and pump house. Damage is likely to the chlorinator.	
Immediate Actions	Isolate the well and pump house from the distribution system.	
Assess impacts to the entire system for secondary impacts (Water source, pumping systems, storage, distribution components)	Check other facilities for damage due to flood water or runoff. Tank foundations, other wells, and pump houses. Check if access roads to facilities are passable.	
Notifications	 Notify NDEP BSDW initially, and during if any conditions change, then again when the emergency has been mitigated and ready to return to normal operations. Notify customers and the media that the flooded well is taken offline. Notify customers of the planned course of action to disinfect the well per AWWA standards. When fully confirmed the well and pump house are safe to bring back into service, notify the customers and the media. 	
Mitigations	Review existing mitigations. Were they effective? Could they be improved upon? How? Are they improvements that could be easily added or must you wait for budgeting?	
Follow-up Actions	 Inspect all equipment and safety devices for proper operation. Conduct a post emergency review. Update ERP as needed. 	

6.6 Other Events to Address at a Minimum

- Extended Freezing Temperatures
- Deep or Heavy Snow
- Fire / Wildfire
- Epidemic/pandemic



Section 7.0 Alternative Water Sources

Alternative water sources should be identified to ensure a safe and continuous supply of drinking water will be available to customers in the event of an emergency. If another water utility is located nearby, an opportunity for interconnection may exist. When no possibility for an intertie exists, arrangements should be made to purchase water from a water hauler or from a bottled water supplier.

Water Source	Supplier Name	Contact Info
Interconnection w/ Partner Utility	None available	
Approved Water Hauler	Contact the NDEP BSDW for permitted water haulers	
Bottled Water Supplier		



ENVIRONMENTAL PROTECTION

Section 8.0 Returning to Normal Operations

In the conclusion of any emergency event, identify the general and specific steps to take:

Consider:

- Consult with the NDEP BSDW or appropriate District Health Department
- Notify and thank staff
- Notify customers and the media
- Summarize actions and associated costs in preparation for audits or submission for reimbursement
- Check gates and locks, operational settings, and return the system to normal operation
- Update ERP if warranted

