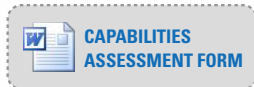


Prepared for Contamination in Your Distribution System?

A Distribution System Contamination Response Procedure (DSCR) guides your utility through a contamination incident. As part of your utility's Emergency Response Plan (ERP), a DSCR covers the investigation, response, and recovery activities that are unique to a contamination incident.

PLAN YOUR RESPONSE

STEP 1: ASSESS your utility's current preparedness. Use the provided assessment form to identify and review existing contamination response capabilities: plans, procedures, training, assets, personnel, and response partners.



STEP 2: INTEGRATE your existing capabilities into the outline provided in the DSCR template. Coordinate the elements of the DSCR with your utility ERP. Identify gaps and create a "to-do" list of areas to improve.

STEP 3: INTERVIEW your response partners to determine their experience with water emergencies and how they can aid your utility during a contamination incident. Use the provided interview form to approach partners and identify shared resources, determine authorities (e.g., primacy agency), provide contact information, and discuss their ability to provide assistance.



STEP 4: CREATE an initial draft using the outline and DSCR template. Envision how you will investigate, respond to, and remediate a contamination incident. Identify the major steps, actions, decision points, communication points, and expected contributions from response partners. Customize the provided decision trees and forms to provide a visual set of instructions for responders to follow, and populate the reference tables and lists to expedite decision making. Fill in the gaps identified in Step 2 with new or improved capabilities.



DSCR OUTLINE

1. Introduction
2. Roles & Responsibilities
3. Response Procedure Overview
4. Investigation & Response Phase
5. Site Characterization, Sampling, & Analysis
6. Operational Responses
7. Risk Communication
8. Remediation & Recovery Phase
9. Incident Close-Out & After-Action Report / Improvement Plan

STEP 5: ENGAGE response partners and other stakeholders to gather feedback on the draft DSCR and their level of involvement during a contamination incident. Confirm roles and responsibilities, discuss responses, determine earliest points of contact, and ensure that the draft DSCR matches their response plans. They should also validate any assumptions the utility may have about their capacity to assist during an incident. Partners can be engaged through one-on-one meetings, group meetings, partner workshops, or discussion-based exercises, depending on how involved the partner is anticipated to be in an incident.

STEP 6: COMPLETE the final draft once all partners have reviewed and provided feedback. If significant alterations are made to the document, hold additional rounds of discussions with response partners to review the updates. View Steps 5 and 6 as a series of meetings held to resolve specific issues and inform revisions to the plan, producing several intermediate drafts before arriving at a final draft. The completed document should be submitted to all necessary response partners for final approval and then approved by utility management and put into practice.

STEP 7: IMPLEMENT AND MAINTAIN your DSCR through training and exercises, using those experiences to improve the document. Integrate contamination-specific training and exercises into your routine training program. Include response partners, when appropriate, to improve coordination and ensure they stay familiar with the response. Review/revise the DSCR based on lessons-learned from any exercises or real events that occur; as personnel, capabilities, and practices change; and alongside any update to your utility's ERP.

LEARN MORE

Visit the Water Quality Surveillance and Response System Consequence Management Resources page for more information on responding to a contamination incident at <https://www.epa.gov/waterqualitysurveillance/water-contamination-response-resources>.

Download the embedded files and view guidance on building capabilities for each section of the DSCRCP.

WHY PREPARE FOR CONTAMINATION?

Contamination can result from many sources nearly anywhere in the distribution system and can be natural, accidental, or intentional. Contaminants can enter the distribution system by passing through treatment, through cross-connections, inflow through leaking pipes, contamination at water storage facilities, and repair or construction activities. Regardless of cause, contamination incidents require a measured, yet appropriate response to fully address the potential contamination and protect public health while not over-responding, wasting resources, and causing undue alarm to customers.

HOW IS CONTAMINATION DIFFERENT FROM OTHER EMERGENCIES?

The response to drinking water contamination usually begins with only an indication that contamination may have occurred and very little other information. The incident requires a potentially lengthy investigation to determine what has happened. Specific response activities are implemented incrementally, alongside the investigation, as more information is discovered (e.g., identity of the contaminant, extent of contamination, impact on customers, etc.).

IS A RESPONSE PROCEDURE DIFFERENT THAN AN ERP?

A response procedure guides response actions and decisions for a specific type of incident (e.g., flooding, earthquake) and is typically included as an annex or appendix to a utility's ERP. A DSCRCP covers the specific details for responding to a contamination incident, but does not repeat information common to all emergencies, such as system-specific information, alternate water supplies, and safety procedures. That common information is typically captured in the overarching ERP.

DO I NEED AN ERP TO HAVE A DSCRCP?

While the DSCRCP template was created with the assumption that a utility already has an ERP, it is not necessary to have an ERP to create a DSCRCP. The general response elements covered in an ERP, such as alternate water supplies and safety procedures, can be added to a DSCRCP directly.

HOW LONG WILL IT TAKE TO CREATE?

The process will require significant discussion and planning both within the utility and with external response partners, and may occur over several weeks.

CAN I DEVIATE FROM THE DSCRCP TEMPLATE?

Yes. The template is provided as a starting point. It should be customized to fit the needs of your utility.

WHO SHOULD BE INVOLVED IN DEVELOPING A DSCRCP?

Development should be led by a single individual or small team, but personnel from all utility departments should provide input on their involvement during an incident. Utility management should be involved to make high level decisions and provide support for development and implementation of the DSCRCP. In addition, response partners and other stakeholders should be included in the development process to confirm their involvement and ensure the DSCRCP is consistent with their response plans. Details on involving response partners and other stakeholders are discussed in the development process.

ARE RESPONSE PARTNERS REQUIRED?

In general, yes, some response partner involvement will be necessary to respond to a drinking water contamination incident. However, the level of response partner support needed will depend on the capabilities of your utility. Most utilities probably do not have the resources to develop all necessary response capabilities and, thus, should work with response partners to fill any gaps. In addition, some incidents may require actions mandated by regulation (e.g., public notification) and the utility should work with their primacy and public health agencies to ensure the DSCRCP and the response comply with any legal requirements.

DO I NEED FORMAL AGREEMENTS WITH RESPONSE PARTNERS?

While not necessary, formalizing the relationships through an agreement (e.g., memorandum of understanding, memorandum of agreement, mutual aid and assistance agreement) explicitly defines expectations and ensures no misunderstandings arise during or after an incident occurs.

SHOULD WE PRACTICE A CONTAMINATION RESPONSE?

Training and exercises for a contamination scenario using your DSCRCP allow utility and response partner staff to stay familiar with the response, allows you to "ground-truth" the processes and update them to better reflect actual experiences, and bolsters relationships with response partners established during development of the document.

