STATE OF CONNECTICUT DEPARTMENT OF PUBLIC HEALTH

Renée D. Coleman-Mitchell, MPH Commissioner



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Drinking Water Section

Circular Letter 2019-21

FROM: Lori Mathieu, Public Health Section Chief

TO: Public Water Systems

Date: October 23, 2019

SUBJECT: Review of Water Supply Emergency Contingency Plan Procedures and Security Measures

The security and reliability of clean potable water sources are a top priority for all public water systems. The Department of Public Health (DPH) recommends a review of current submitted Water Supply Plans on file for Public Water Systems. Specifically, each plan should have a section that identifies emergency procedures and subsequently defines what actions the water system should take in the event of an emergency.

The Regulations of Connecticut State Agencies (RCSA) defines *Source Water Protection Measures* in Sec. 25-32d; specifically, Sec. 25-32d-3d(1-9) covers *Water Supply Emergency Contingency Plan* content:

- "(d) A water supply emergency contingency plan, including emergencies due to contamination of water, power outages, drought, flood or failure of any or all-critical system components. Such water supply emergency contingency plan shall include:
- (1) A list identifying critical system components and potential water supply emergencies that may affect them including contamination, power outages, drought, flood or failure, but excluding routine events, such as water main breaks and inoperable valves;
- (2) A list identifying significant user groups in commercial, industrial, municipal and residential categories, and discussions of mechanisms of direct technical assistance to these significant quantity user groups.
- (3) a description of the level of service to be sustained during water supply emergencies, including identification of priority users, procedures for public notification of priority users, and





the means for provision of essential potable water to priority users where priority is based on the potential risk to health, safety and welfare posed by the curtailment of service; and procedures for advance notice to users for which service may be suspended if rationing is required and for implementation of rationing and use bans; Sec. 25-32d page 9 (3-07) Department of Public Health § 25-32d-3

- (4) procedures for responding to toxic spills or hazardous materials that may contaminate a watershed or aquifer used for drinking water;
- (5) an inventory of equipment needs and availability, including location of existing emergency equipment, generators and spill response materials, identification of additional emergency equipment needs, and procedures for obtaining additional equipment or services;
- (6) a list prioritizing emergency sources, including interconnections and independent industrial and commercial water supplies within the service area, and describing contractual, technical and financial requirements for their use, a schedule for activation, available yield and known water quality problems or limitations;
 - (7) procedures for notification of local, state and federal officials and the public;
- (8) a description of duties and responsibilities of key personnel involved in emergency response actions, and a procedure for contacting and scheduling staff;
- (9) a description of local ordinances and municipal authority to implement water use restriction."

*Note: There are additional emergency measures to consider, the above items (1-9) are most applicable to any type of emergency condition.

Security Measures:

Additionally, the Department recommends a review of the security measures for the site and facility both internal and external to the public water system including some examples listed here. Security cameras with motion detection and motion lighting can deter and detect criminal activity as well as serve as a useful tool in recording trespassers to the site. Setting up alarms or silent alarms could additionally serve to notify the public water system personnel, neighbors or law enforcement personnel of trespasser activity. Externally, fencing around water supply areas or having hired patrol of the site would help lower risk of harm to water sources and facilities. Ensure reliable locks are installed for access to buildings and facilities, including sheds. Internally, a silent alarm for chemical treatment facility and alarms for chemical feed systems would notify remote Certified Operators or other qualified personnel in the event of chemical system tampering or system failure issues.

Other examples of proactive planning and response in conjunction with security measures could be, but are not limited to, the following:

- 1. Decisions are needed to be made by the public water system (PWS) to ensure customers have available potable water and steps are in place to have a secure system.
- 2. Develop a security response team with protocol and training for the staff.
- 3. Develop and train multiple teams for response to security related issues (in case some staff are not available, other members from multiple teams can act).
- 4. Prepare to shut down a source or facility that has been impacted by a security breach until investigation and sample results demonstrate water is safe.
- 5. Implement communication system to inform the public (Reverse 911/social media/website/FD/PD).
- 6. Identify and work with other PWSs to install and utilize a viable interconnection. Once the interconnection is installed, test the interconnection to ensure water can be delivered using the interconnection.
- 7. Implement remediation measures in case of spills.
- 8. Plan ahead and contact potable water haulers to address potable water demands for the system during a security breach.
- 9. Allocate dedicated funds for purchase of bottled water during the interim period for purchase of bottled water/potable water for emergency situations.

Proactive steps in both emergency preparations and security measures will greatly assist the preparedness of a public water system in the event of an emergency. Emergencies can take many different forms in the field of drinking water, but essentially having a core plan of how to best effectively respond and ensure water quality is maintained and served is essential in ensuring the public health of the community is maintained.

c: Deputy Commissioner Heather Aaron - DPH Local Health Directors Certified Operators