




CHANGES COMING DOWN THE PIPE FOR WATER UTILITIES

America's Water Infrastructure Act of 2018 (AWIA) requires water systems that serve communities of over 3,300 people to prepare and update a Risk and Resilience Assessment (formerly known as Vulnerability Assessment) and Emergency Response Plan every 5 years.

CLICK HERE TO LEARN MORE ABOUT AWIA

IMPORTANT DEADLINES TO KNOW



SIZE OF COMMUNITY SERVED	RISK AND RESILIENCE ASSESSMENT (RRA)	EMERGENCY RESPONSE PLAN (ERP)
 ≥ 100,000	March 31, 2020	September 30, 2020
 50,000 to 99,999	December 31, 2020	June 30, 2021
 3,301 to 49,999	June 30, 2021	December 30, 2021

* The dates above reflect the initial certification deadlines for submission to the EPA *



Every **five years**, utilities must review their RRA and submit a recertification to the U.S. EPA that the assessment has been reviewed and, if necessary, revised.

Within **six months** of submitting the RRA, utilities are required to certify to the U.S. EPA that their ERP has been reviewed and, if necessary, revised.

RRA REQUIREMENTS

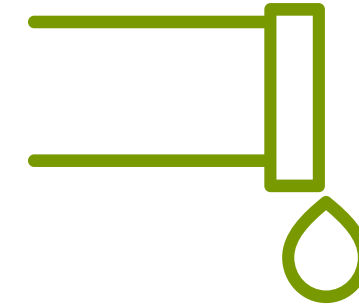
The RRA evaluates the risk preparedness and resiliency of water systems serving communities of greater than 3,300 people. The assessment shall include:



MALEVOLENT ACTS AND
CRIMES



NATURAL
HAZARDS



INFRASTRUCTURE
RESILIENCE



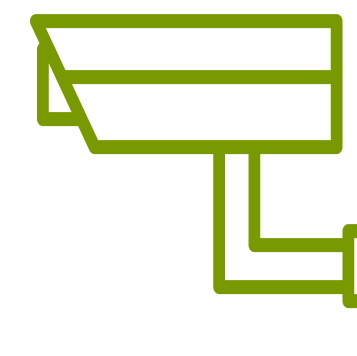
FINANCIAL
INFRASTRUCTURE



TECHNOLOGICAL
HAZARDS



MANAGEMENT
AND MAINTENANCE



MONITORING
PRACTICES



CHEMICAL
MANAGEMENT

ERP REQUIREMENTS



Strategies and resources to improve resilience of physical and cyber assets.



Having a plan in place for equipment to be mobilized in the event of a threat to the utility's ability to deliver safe drinking water.



Actions, procedures, and equipment which can prevent or significantly lessen the impact of a malevolent act or natural hazard on the public health and the safety and supply of drinking water



Strategies in place that can be used to detect the occurrence of malevolent acts or natural hazards that may threaten the security or resiliency of the system.

CERTIFICATION REQUIREMENTS



Q: What happens if certification compliance is not submitted to the EPA?

A: The water utility may be subject to a penalty of up to \$25,000 per day.

Certification of completion of the RRA and ERP must be submitted to the United States Environmental Protection Agency (EPA) by the compliance deadline. The AWIA requires you to submit only a certification of completion of the RRA and ERP. The actual assessment documents are not required. Electronic submittal is recommended, however email, regular mail, and alternate submittal options are available.

[CLICK HERE TO LEARN MORE ABOUT THE CERTIFICATION PROCESS](#)

RECOMMENDED COMPLIANCE STRATEGIES

1. ASSET CHARACTERIZATION

2. THREAT CHARACTERIZATION

3. CONSEQUENCE ANALYSIS

4. VULNERABILITY ANALYSIS

5. THREAT ANALYSIS

6. RISK/RESILIENCE ANALYSIS

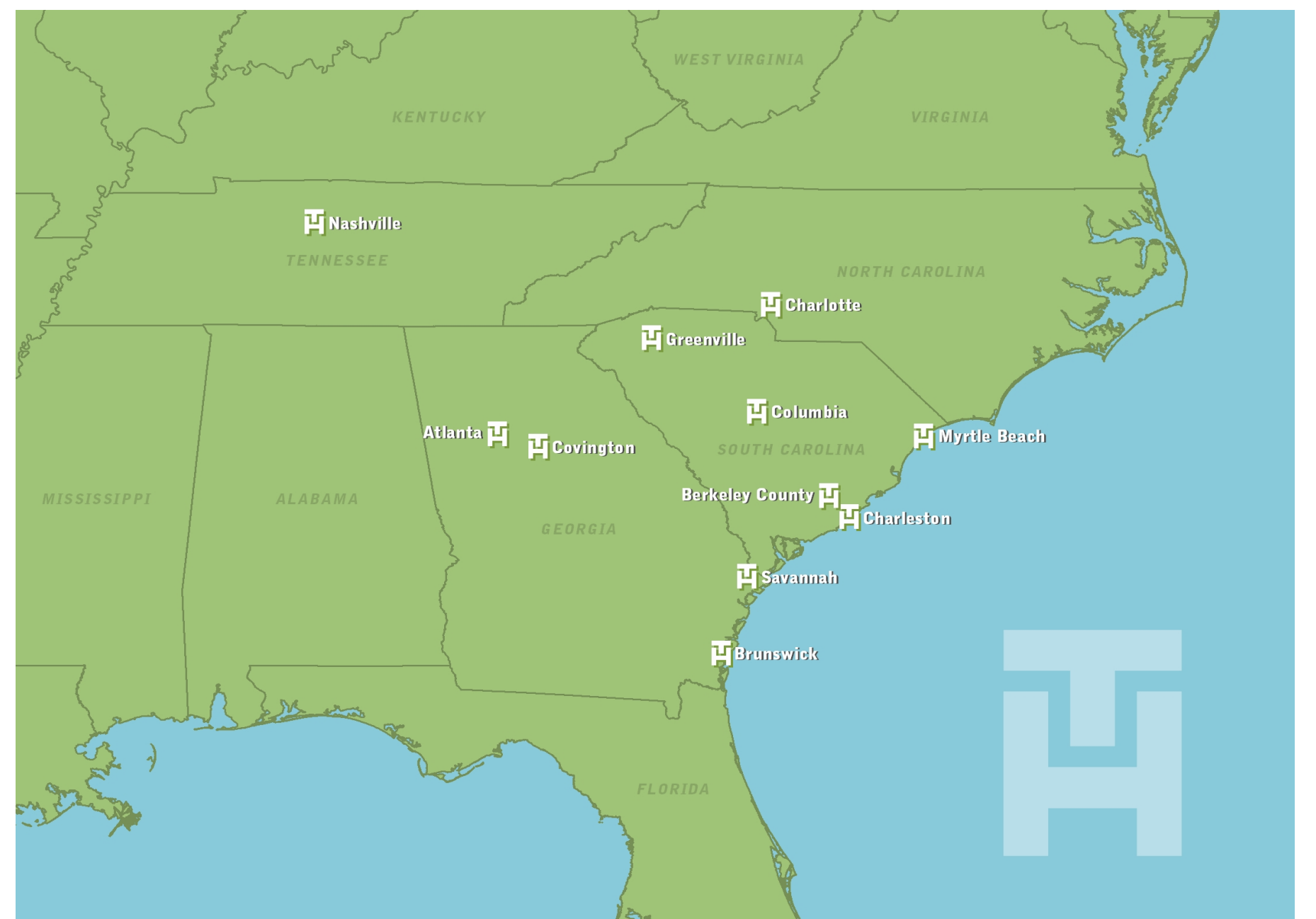
7. RISK/RESILIENCE MANAGEMENT

Thomas & Hutton recommends following the seven-step risk assessment method from the J100-10 American Water Works Association (AWWA) Risk and Resilience Management Standard. The J100 takes an all-hazards approach to identifying critical assets and resilience to the threats/hazards they may face.

The J100 provides a process for identifying system vulnerabilities due to both internal and external factors, and provides methods to evaluate options for improving these weaknesses in water and wastewater utilities.

THOMAS & HUTTON

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FOR MORE INFORMATION, CONTACT:

Lisa Muzekari, PE, ENV SP

☎ 803-451-6789 📠 803-451-6781 ✉ muzekari.l@tandh.com

Michele Richbourg, PE, LEED AP

☎ 843-849-0200 📠 843-725-5237 ✉ richbourg.m@tandh.com

www.tandh.com