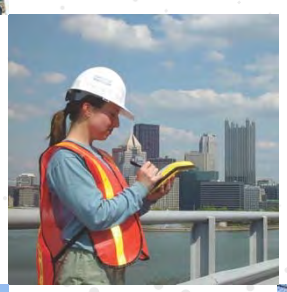
Hatch Mott MacDonald

Crisis Communication Planning for Water and Wastewater Utilities



Carol T. Walczyk, PE, PMP

PA-AWWA Conference, April 23, 2015

Presentation Overview

- **When** is Public Notification required?
- **Who** needs to be notified?
- **What** needs to be done before, during, and after a notification event?
- **Why** is it important to plan ahead for crisis communication?
  - Case Study: DC Water Boil Water Advisory
- **Where** can you find more information?

When Is Public Notification Required?

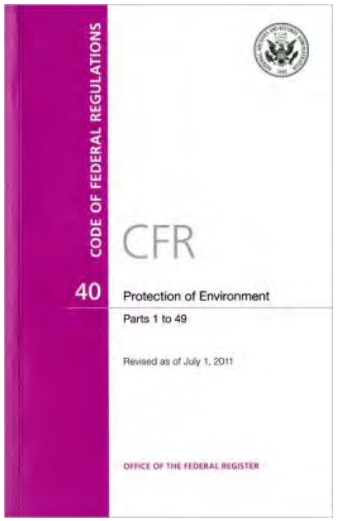
Required when there has been a violation of the Safe Drinking Water Act (drinking water) or permit conditions (wastewater)

Recommended for non-regulatory situations that impact public health, facility core purpose, or aesthetics

Federal Drinking Water Public Notification Rule

40 CFR Part 141, Subpart Q

- Defines types of public notifications and their triggers
- Dictates content of public notices
- Establishes procedures for notification, reporting, and recordkeeping



PN Rule Tiers

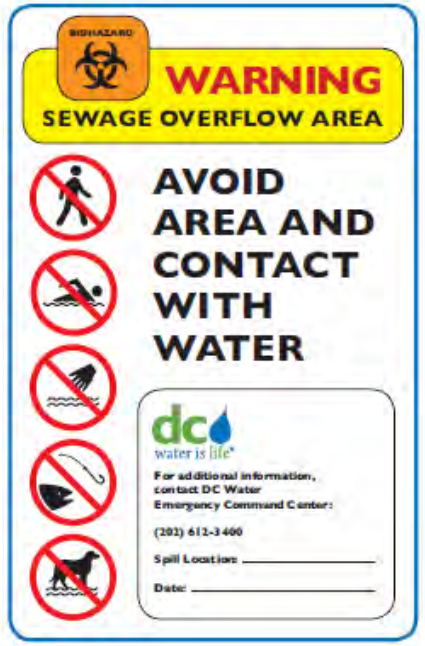
Tier	Situation	Required Distribution Time	Notification Delivery Method
Tier 1 Immediate	Potential for immediate human health impacts	Within 24 hours	Media, public posting, personal delivery
Tier 2 Within 30 days	Exceeded maximum contaminant levels or did not provide proper treatment, potential risk to human health with long-term exposure	ASAP, but within 30 days	Mail and posting, media use encouraged
Tier 3 Annual	Standard violated but no direct impact on human health	Up to one year	Include in Annual Water Quality Report (CCR) or mail/posting

Types of Water Advisories

- **Boil Water** – Boil before drinking or cooking.
- **Do Not Drink** – Do not use for drinking or cooking.
- **Sanitation Only** – Do not use for drinking, cooking, or bathing. Can be used for flushing toilets, washing cars etc.
- **Do Not Use** – Do not use for any purpose.
- **Informational** – Planned or anticipated changes in water quality.
- **Conservation** – Anticipated water shortage or upcoming use restriction.
- Past incident with no current health threat.

Types of Wastewater Advisories

- **Closure** of affected areas due to spills or infrastructure failure
- **Warning** – potential public health impacts
- **Informational** – planned construction activities



The Ten Elements

- A **description** of the violation that occurred, including the **potential health effects**
- The **population at risk** and if **alternate water supplies** need to be used
- What the water system is doing to **correct** the problem
- Actions **consumers** can take
- **When the violation occurred** and **when the system expects it to be resolved**
- How to **contact** the water system for more information
- Language encouraging broader **distribution** of the notice

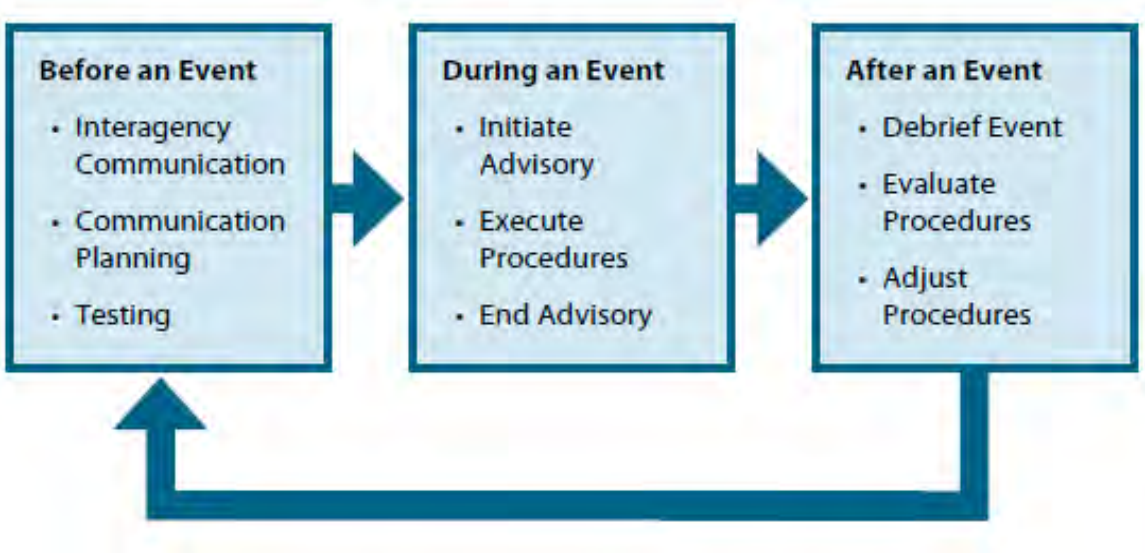
Who needs to be notified?

- Customers and members of the public affected by event
- Public health agencies
- Critical customers
- Regulatory agencies
- Affected utilities
- Government officials
- Media
- Utility staff and contractors
- Others as identified by the utility

What needs to be done?

- Before an advisory – Plan.
- During an advisory – Execute.
- After an advisory – Evaluate and update plan.

Public Notification Phases



Source: Drinking Water Advisory Communication Toolbox, Figure 1.

Preparing for an Advisory

- Maintain inventory of assets and resources needed to quickly issue an advisory.
- Maintain planning documents with the most up-to-date information.
- Plan and conduct communication on a regular basis with partner agencies, regulatory agencies, community organizations, and critical customers.
- Develop and maintain standard messages for various advisories and notices, in multiple languages, which can be customized for specific events.

Preparing for an Advisory (cont'd)

- Conduct training exercises.
- Liaison with primacy agency.
- Develop and maintain SOPs for notice distribution.
- Maintain inventory of supplies needed for notice distribution.
- **All parties with responsibilities for preparing for and issuing advisories must be familiar with the Plan and their role in executing the Plan.**

Preparing for an Advisory (cont'd)

- Identify and map critical customers, e.g.:
  - Food processing facilities
  - Healthcare facilities
  - Jails
  - Nursing homes
  - Schools
  - Special needs customers
  - Airports
  - Arenas, stadiums, and other large venues
  - Colleges and universities
  - High-volume customers
  - Hotels
  - Ice production
  - Government agencies/military

Preparing for an Advisory (cont'd)

- Plan approach to include susceptible populations:
  - Persons with medical needs that make them sensitive to water quality or contamination issues
  - Persons with special communication needs
  - Persons lacking resources to act on the information in an advisory

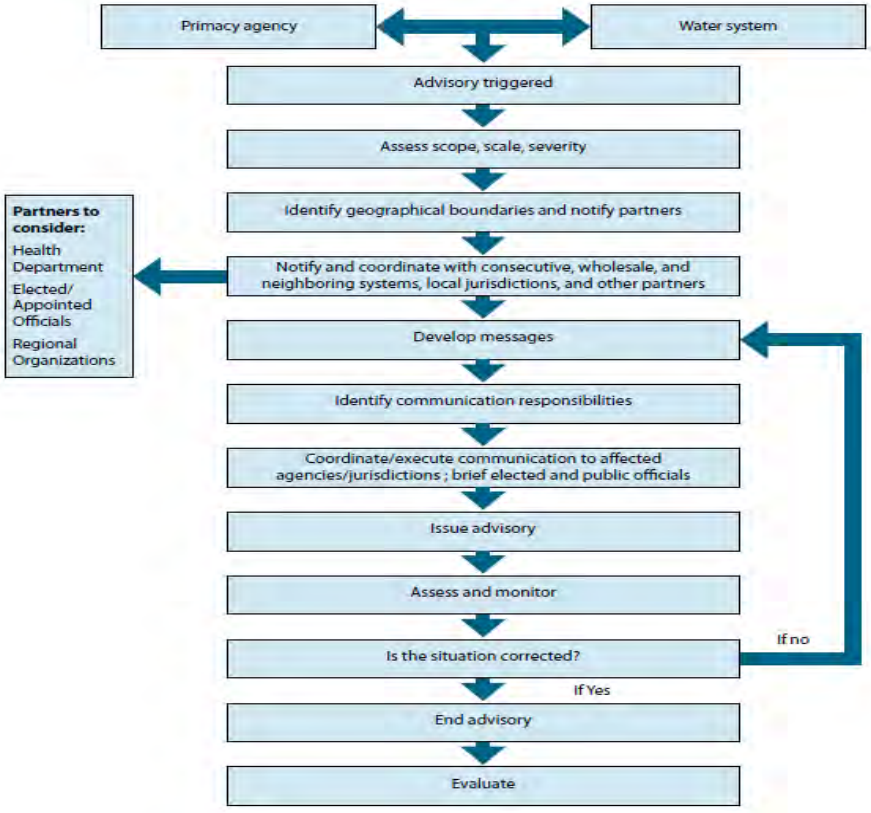
Staff Roles

- Establish specific responsibilities for staff members by title.
- Designate alternates.
- Conduct training to ensure everyone knows their role.
- Coordinate with Emergency Management Plan/ICS.

Staff Roles

- Incident Commander
- Internal Communication
- External Communication (Public)
  - Notice development
  - Notice approval
  - Notice distribution
  - Media
  - Customer Service
- External Communication (Interagency)
- Legal
- Financial

During an Advisory



Source: Drinking Water Advisory Communication Toolbox, Figure 4.

Steps to Issue an Advisory

- 1 – Initiate Internal Notification
- 2 – Mobilization
- 3 – Execution
- 4 – Monitoring
- 5 - Closing

Phase I: Initiate Internal Notification

- Incident Commander and notification chain designated in advance planning.
- Convene internal conference call or meeting.
- Determine whether Emergency Management Plan activation is required.
- Characterize event.
- Assess scope, scale, and severity of event.
- Select type of advisory message.

Phase 2: Mobilization

- Alert team for distribution of notices: translation agency, placement of signs and door hangers, social media, website
- Alert regulatory agency
- Alert affected utilities
  - Wholesale customers
  - Water/sewer

Phase 3: Execution

- Continue to develop and review notice content.
- Primacy/Interagency Conference Call if needed.
- Finalize notice.
- Prepare for distribution:
  - Translate notice.
  - Prepare Customer Service scripts.
  - Notify utility staff and contractors.

Phase 3 cont’d

- Distribute Tier 1 or Urgent Notice
  - Broadcast Media
  - Posting in Conspicuous Locations
  - Hand Delivery
  - Robocalls/Reverse 911
  - Method approved by State in advance

Phase 3 cont’d

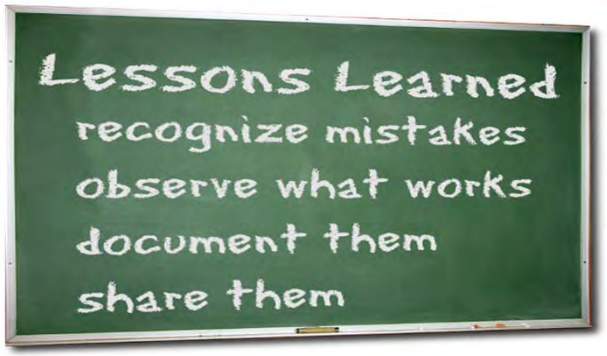
- Tier 2/3 notice distribution:
  - by direct mail or hand delivery, may also issue a print media announcement or ad, post on website, and deliver to community organizations
    - Tier 2 as soon as possible, but within 30 days
    - Tier 3 within 1 year, can be in CCR

Phase 4: Monitoring

- Provide updates to team throughout notification event.
- Ensure that updates are communicated to public regularly throughout notification event.
- For a prolonged event, ensure that new customers are notified.
- Ensure that other regulatory requirements are met during event.

Phase 5: Closing

- Issue notification of end of event when/if applicable.
- Issue certification to primacy agency within 10 days of notice distribution.
- Conduct review of response, prepare After Action Report, and update “lessons learned” database and Public Notification Plan as needed.



Why should you plan ahead?

- Chaotic nature of an emergency situation
- Coordination of public notice with emergency response
- All emergencies are different, but some aspects may be similar
- Public confidence

Case Study – DC Water

- Provides more than 640,000 residents, 17.8 million annual visitors, and 700,000 workers with water and sewer/wastewater treatment, plus additional wholesale wastewater treatment service for an additional 1.6 million in VA and MD.
- Average water demands 100 MGD, 95 MG of storage
- Blue Plains Wastewater Treatment Facility treats 370 MGD, peak capacity more than 1 BGD

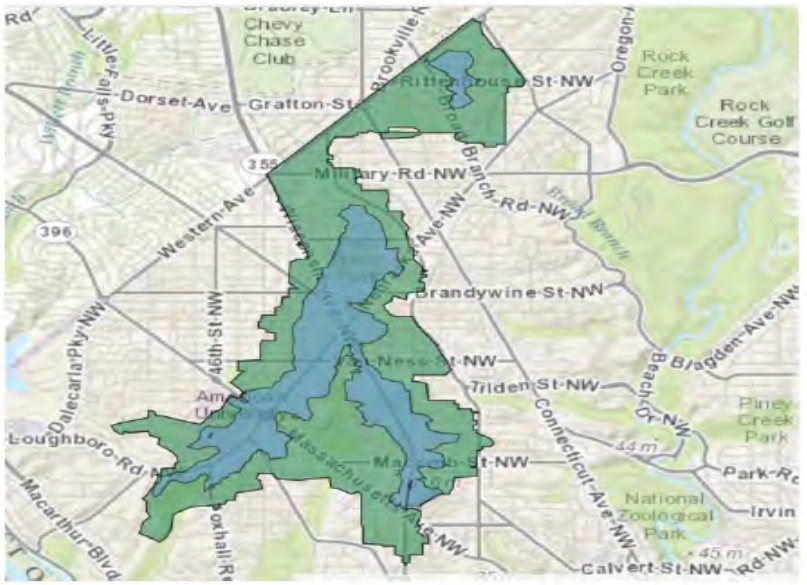
Case Study – DC Water

- Approximately 1,118 employees
- Primacy agency is EPA Region III
- Extensive emergency response planning

Case Study

- March 5, 2014 Boil Water Alert
  - Due to a pumping station power outage, DC Water issued a precautionary Boil Water Advisory for approximately 1,010 affected premises.
  - Existing Public Notification Plan was undergoing update

The green shaded area in the map below represents area affected by low or no water pressure.



Case Study Lessons Learned

- Need to improve ways to identify and describe affected area
  - Interactive Mapping.
  - Educate customers in advance about their location, in laymen's terms.
- Anticipate dissemination of misinformation
  - Include additional sites if any doubt or confusion.
  - Keep utility staff and contractors informed.
- If using Reverse 911 or Robocalls, need SOPs (call time, frequency, standard messages)

Case Study Lessons Learned

- Maintain door hanger distribution SOPs and resources (paper inventory, delivery supplies, delivery staffing matrix, pre-printing)
- Consider signs in addition to door hangers: lawn signs, electronic signs.
- Include anticipated duration in original notice, if known.

Case Study Lessons Learned

- Coordinate/consolidate media interviews/press conferences.
- No more than 8 hours between public updates, even if status is unchanged.
- Encourage critical infrastructure and businesses to self-identify in advance.
- Establish SOPs for interagency coordination: notification, call list, reporting time.

Case Study Lessons Learned

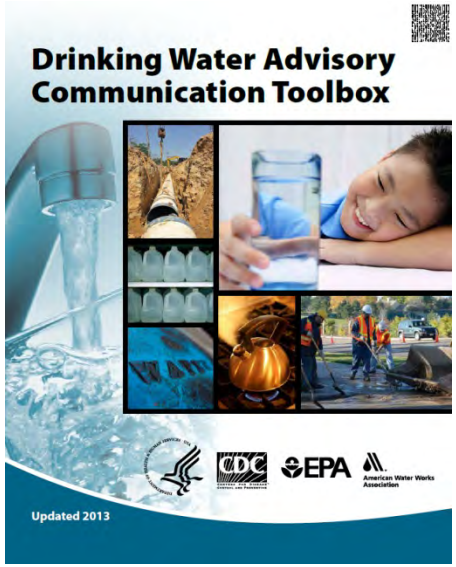
- Importance of proper identification for utility employees.
- Keep employees and contractors informed and updated.
  - Status of emergency
  - Where to direct inquiries
  - What is expected of them

Case Study Lessons Learned

- Emergency Planning and Public Notification Planning effective
- Response documents reviewed and updated after each event
- Continue to incorporate non-regulatory requirements

Where can you find more information?

- Public Notification Rule, 40 CFR Part 141, Subpart Q
- *Revised Public Notification Handbook*, EPA
- *Drinking Water Advisory Communication Toolbox,* US DHHS, CDC, EPA, AWWA
- EPA Public Notification Rule webpage: http://water.epa.gov/lawsregs/rulesregs/sdwa/publicnotification/
- Jonathan Reeves, Manager, Office of Emergency Management, DC Water – jonathan.reeves@dcwater.com, 202-812-2141



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Questions/Discussion

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