

A Reminder Regarding your Vulnerability Assessments and Emergency Response Plans

By John Hartz
NYRWA Training Specialist



Have you sent your VA to EPA? Just because you sent your VA and ERP to New York State DOH, does not mean that your system has met the Federal requirements. You must also send a copy to EPA. Let's review the requirements for small water systems...

The Bioterrorism Act of 2002, amended the Safe Drinking Water Act (SDWA) by adding section 1433. Section 1433(a) requires that certain community water systems (CWS) conduct Vulnerability Assessments (VAs), certify that the VAs were conducted, and submit a copy of the VA to EPA. Section 1433(b) requires that certain CWSs, prepare or revise Emergency Response Plans (ERPs) and certify to EPA that an ERP has been completed.

What must you do to comply with these requirements?

All CWSs serving populations from 3,301 to 49,999 persons must comply with the Bioterrorism Act by June 30, 2004. The Bioterrorism Act requires these community water systems to:

1. Conduct a VA;
 2. Certify to EPA that the CWS conducted a VA;
 3. Submit a copy of the VA to EPA; and
 4. Certify to EPA that the CWS has completed an ERP*
- * (Due within 6 months of sending your VA certification to EPA, Dec 31, 2004 at the latest)

The VAs that were required by NYS DOH will meet the basic content requirements for EPA. So you do not have to complete another VA, but you still have to send a copy of your VA to EPA along with the two certification letters.

The best instructions for sending in your VA certification letter, VA, and ERP certification letter, can be found in EPA document # 810-B-02-001, Instructions to Assist Community Water Systems in Complying with the Public Health Security and Bioterrorism Preparedness and Response Act of 2002.

Downloadable copies of this document can be found on the EPA web site at www.epa.gov/safewater/security. Or you can order a copy from the EPA Safe Drinking Water Hotline at 1-800-426-4791. You can also call New York Rural Water at 1-518-828-3155. This document contains all the information on how to submit your VA and certification letters, the content requirements, needed certification forms, and the proper mailing instructions and addresses. So, don't forget to send them to EPA by June 30, 2004! ♠