**AP 1A Threat of or Actual Contamination to Water System**

**POSSIBLE STAGE**

**ACTION PLAN SUMMARY**

This Action Plan 1A applies to the intentional introduction of a contaminant into the water system. The contaminant could be introduced at any point within the system, including raw water, treatment facilities, distribution system including distribution pipes, finished water storage, or pump stations. The adversary may or may not give notice of the contaminant or provide the location. Contamination may have actually occurred, or it may be a hoax.

**Use this Action Plan 1A if you receive any incident warning listed below indicating possible contamination of your water system. If you have evidence that corroborates the warning, or** **if collective information indicates that contamination is likely, GO TO Action Plan 1B CREDIBLE STAGE**.

**If there is confirmed evidence and/or definitive information that the water system has been contaminated,** **GO TO AP 1C CONFIRMED STAGE.**

**INITIATION AND NOTIFICATION**

**Initiate this Action Plan if any of the following has occurred:**

* **Security Breach** including, for example:
  + Unsecured Doors
  + Open Hatches
  + Unlocked/Forced Gates
  + Alarm Triggered
* **Witness Account** including, for example:
  + Suspicious Activity
  + Trespassing
  + Breaking and Entering
  + Tampering with Equipment or Property
* **Direct Notification by Perpetrator** including, for example:
  + Verbal Threat
  + Threat in Writing
* **Notification by Law Enforcement** including, for example:
  + Suspicious Activity
  + Threat made to Water System
* **Notification by News Media** including, for example:
  + Threat Delivered to News Media
  + Media Discovers Threat
* **Unusual Water Quality Parameters** including, for example:
  + Changes in pH, chlorine residual or turbidity
  + Unexpected monitoring or sampling results
  + Strange odor, color or appearance
* **Customer Complaints** including, for example complaints of:
  + Odor
  + Color or Appearance
  + Taste
* **Public Health Notification** including, for example:
  + Victims in Emergency Rooms and/or Clinics
  + High Incidence of Similar Health Complaints in one Local Area

The individual who first notices or receives any of the listed threat warnings should immediately contact the water system’s designated Water Utility Emergency Response Manager or its alternate Water Utility Emergency Response Manager. Those individuals may also be referred to with the acronyms **WUERM** or **alternate WUERM**. Any available means of communication shall be used.

**EQUIPMENT IDENTIFIED**

This equipment is available to assist in the execution of this Action Plan.

|  |  |
| --- | --- |
| **Equipment:** | **[Insert Name of Equipment]** |
| **Location:** | **[Insert Location of Equipment]** |

**SPECIFIC ACTIVITIES**

**I. Assess the Problem**

A. Complete the following **Threat Warning Report Forms** according to the type of Threat Warning received as described in Section VIII of the Emergency Response Plan. Please note that Threat Warning Report Forms help document, organize and summarize information about a security incident. The individual who discovers the incident warning, the WUERM or another designated individual may complete the form. Only the form that corresponds to the type of threat warning needs to be completed. Completion of the form should not distract emergency responders from more urgent matters.

* **Security Incident Report Form**
* **Witness Account Report Form**
* **Phone Threat Report Form to be filled out during actual phone call.**
* **Written Threat Report Form**
* **Water Quality/Consumer Complaint Report Form**
* **Public Health Information Report Form**

B. **Complete Threat Evaluation Worksheet** as described in Section VIII of the Emergency Response Plan. Please note that the Threat Evaluation Worksheets help organize information about a threat warning that will be used during the Threat Evaluation Process.

C. Evaluate Threat Evaluation Worksheet and determine if threat is Possible. Please note that the individual responsible for conducting the Threat Evaluation, such as the WUERM, should complete this worksheet. If YES, the threat is possible, perform Response Steps 1 – 8 below. If NO, the threat is not possible, return to normal operations.

**II. Isolate and Fix the Problem**

1. Notify local law enforcement
2. Notify State Drinking Water Agency
3. Do not disturb site if location could be possible crime scene. Consult **Maintaining Crime Scene Integrity Form** as described Section VIII of the Emergency Response Plan.
4. Alert staff and emergency response personnel about threat.
5. Consider containment/isolation, elevating chlorination and/or discharge of suspect water.
6. Evaluate spread of suspect water and potential impact on public health.

**III. Monitoring**

7. Initiate **Site Characterization** Activities:

* Define the investigation site.
* Designate site characterization team members.
* Conduct preliminary assessment of potential site hazards.
* Approach site and conduct field safety screening to detect any hazards to the characterization team.
* Search for physical evidence, for example discarded containers, etc.
* Investigate records from CCTV cameras.
* Look for environmental indicators, for example, dead animals or fish, dead vegetation, unusual odors or residues.
* Perform rapid field testing of the water
* Collect water samples according to sampling plan.

Please note that Site Characterization is intended to gather critical information to support the ‘credible’ stage of threat evaluation.

If signs of a hazard are evident during the site approach, the team should halt their approach and immediately inform the WUERM of their findings. The site may then be turned over to the HAZMAT Team.

The WUERM may determine the threat is credible based preliminary information before the site characterization has been completed

**IV. Recovery and Return to Safety**

8. Determine if threat is credible. If Yes, initiate Action Plan 1B. If No, return to normal operations. Store water samples for **[Insert Predetermined Time Period Here].**

Please note that you should determine whether or not the threat is ‘credible’ within 2 to 8 hours (preferably within 2 hours) from the time the threat is deemed ‘possible’, depending on the effectiveness of the containment strategy. If the threat is not deemed ‘credible’, the samples obtained during site characterization should be stored in case the situation changes and analysis is determined to be necessary.

**V. Report of Findings**

9**.** File incident reports.

The Utility, through its Security Director, should file an internal report for the Utility’s files, and also provide information as requested to Local Law Enforcement.

**VI. Action Plan 1A Revision Dates**

**[Insert Dates of Revision of Action Plan 1A]**