



## Key Points about VAs and ERPs (Vulnerability Assessments / Emergency Response Plans)

### Rural Development (RD) Funded Systems (water/wastewater systems smaller than 10,000 people)



- 1) All RD funded systems are to have a VA and ERP in place.
- 2) Only systems with RD dollars are required to update their assessments and plans.
- 3) Updates are required every 3 Years; when each RD borrower has their "Financial Security Inspection / Operational Review" conducted by RD.
- 4) To verify the updates have been completed, systems must send into RD their Certification Form(s) as completed by their Software. (Do not send the actual VA/ERP Documents)
- 5) This same Certification form(s) should be copied and also sent into MT DEQ.
- 6) Systems are required to complete a VA/ERP plan based upon which utility that they received funding for. (Water only, Wastewater only or Both!)

### Bio Terrorism Act of 2002 (community drinking water systems serving greater than 3,300 people)



- 1) Required to complete a Drinking Water VA and ERP.
- 2) Wastewater Systems were not required to do assessments or plans under this Act.
- 3) Act does not require the VA/ERP's to be updated.
- 4) EPA is not asking to see any Updates.
- 5) These same systems must send into EPA their Certification Form(s) as completed by their Software. (Do not send the actual VA/ERP Documents)
- 6) This same Certification form(s) should be copied and also sent into MT DEQ.
- 7) Systems are not required to hire a Consultant to complete or update their assessments or plans but may want to access resources that are available to assist.



### Emergency Planning and Community Right-to-Know Act of 1986 (EPCRA)

Utilities that use and store CHEMICALS need to work with their Local Emergency Planning Committee (LEPC) in relation to emergency planning requirements of the EPCRA which is commonly known as SARA Title III, which encourages and supports emergency planning efforts at the state and local levels and provides the public and local governments with information concerning potential chemical hazards present in their communities.

[http://en.wikipedia.org/wiki/Emergency\\_Planning\\_and\\_Community\\_Right-to-Know\\_Act](http://en.wikipedia.org/wiki/Emergency_Planning_and_Community_Right-to-Know_Act)

## However....

Montana Rural Water Systems and DEQ strongly encourage "**All Water and Wastewater Systems**" to conduct a Vulnerability Assessment and prepare an Emergency Response Plan.

**It is in the System's best interest to protect their liability and at the same time protect their community!** This includes updating your assessments and plans every 3 years; in order to keep your system up to date with changes to your contact names and numbers and also to review any upgrades completed to your Water & Wastewater Utilities! Finally but nearly the most important – EXERCISE and PRACTICE your plans with your community and agency partners.

For more information contact:

### **Montana Rural Water Systems, Inc.**

925 – 7th Ave. South  
Great Falls, MT 59405  
406-454-1151  
[mrws@att.net](mailto:mrws@att.net)  
[www.mrws.org](http://www.mrws.org)

### **Dusti Lowndes**

Security and Emergency Preparedness  
Public Water Supply Program  
MT Dept. of Environmental Quality  
655 Timberwolf Pkwy, Suite 3  
Kalispell, MT 59901-1215  
406-755-8976 direct  
406-444-4400 Helena  
406-755-8977 fax  
406-253-7048 cell  
[dlowndes@mt.gov](mailto:dlowndes@mt.gov)