

America's Water Infrastructure Act Section 2013/ Safe Drinking Water Act Section 1433 FAQs

This document compiles frequently asked questions (FAQs) about the requirements of America's Water Infrastructure Act (AWIA) section 2013/Safe Drinking Water Act (SDWA) section 1433 and is intended to complement the existing information on EPA's website.

On October 23, 2018, AWIA was signed into law. AWIA section 2013, which amended section 1433 of the Safe Drinking Water Act (SDWA), requires community water systems (CWS) serving more than 3,300 people to prepare or revise risk and resilience assessments (RRAs) and emergency response plans (ERPs) and certify to the U.S. Environmental Protection Agency (EPA or Agency) that this work has been completed. A CWS's RRA and ERP certification statement is due to EPA on specified dates based on population served. Also, CWSs shall review their RRAs and ERPs at least once every five years after the applicable certification submission deadlines. More information on these requirements, as well as information on compliance tools and resources, are available on EPA's website. If you have any questions related to SDWA section 1433, please email EPA at dwresilience@epa.gov.

These FAQs do not impose legally binding requirements on EPA, states, or the regulated community, nor do they confer legal rights or impose legal obligations upon any member of the public. The laws described in this document contain legally binding requirements. These FAQs do not constitute a regulation, nor do they change or substitute for any law. The general description provided here may not apply to a particular situation based upon the circumstances. Interested parties are free to raise questions and objections about the substance of these FAQs and the appropriateness of their application to a particular situation. EPA retains the discretion to adopt approaches on a case-by-case basis that differ from those described in these FAQs where appropriate. These FAQs are a living document and may be revised periodically without public notice. EPA welcomes public input on these FAQs at any time.

This document is divided into seven main sections:

- 1) Reviewing, Revising, and Recertifying RRAs and ERPs
- 2) CWSs Required to Comply with SDWA Section 1433
- 3) CWS Requirements
- 4) CWS Compliance
- 5) Tools and Resources
- 6) Funding
- 7) Contacts and Outreach

Originally Published: April 2020 Last Revised: June 2024

Reviewing, Revising, and Recertifying RRAs and ERPs

1. What are the certification deadlines for the second round of SDWA section 1433 in 2025-2026?

CWSs must review, revise where applicable, and re-certify their RRA and ERP to EPA every five years from the original deadlines specified in the law. Please see the table below for the previous and next five-year submission cycle RRA and ERP deadlines.

Five-Year Recertification Deadlines

Population Served	Previous RRA Deadline	Next Five-Year Submission Cycle RRA Deadline
≥100,000	March 31, 2020	March 31, 2025
50,000-99,999	December 31, 2020	December 31, 2025
3,301-49,999	June 30, 2021	June 30, 2026

Population Served	Previous ERP Deadline*	Next Five-Year Submission Cycle ERP Deadline*
≥100,000	September 30, 2020	September 30, 2025
50,000-99,999	June 30, 2021	June 30, 2026
3,301-49,999	December 31, 2021	December 31, 2026

^{*}ERP certifications are due six months from the date of the RRA certification. The dates shown above are certification dates based on a utility submitting a RRA on the final due date.

2. What are the requirements for RRAs and ERPs in the second round of SDWA section 1433 in 2025-2026 and how have they changed since the first round in 2020-2021?

The requirements for RRAs and ERPs as written by Congress in AWIA section 2013, which amended SDWA section 1433, have not changed. However, CWSs and the landscape of threats they face have changed over the past five years. EPA wants to underscore the importance of CWSs conducting a thorough review of, and making substantial updates, as appropriate, to their RRAs and ERPs. EPA encourages CWSs to consider adding to, or bolstering, existing sections of their RRAs and ERPs based on the latest knowledge of emerging, as well as ongoing threats to the water sector. EPA's Water Resilience Website has the latest information on evolving threats like cybersecurity, supply chain resilience, climate change, and more that CWSs may use to update their RRAs and ERPs.

3. Does EPA require a specific type of documentation to prove that my CWS updated our RRA and ERP?

There are no specific documentation requirements in the law beyond the RRA and ERP recertification. However, it may be helpful to maintain records of the review so you can access information on any review meetings that were held and who reviewed and revised the document.

4. How can I update the contact information used to reach out to my CWS about SDWA section 1433?

EPA receives quarterly updated CWS administrator contact information (e.g., email address, mailing

address, and phone number) that each CWS reports to its respective state, federal, or tribal primacy agency for the <u>Safe Drinking Water Information System (SDWIS)</u>. This contact information will be used by EPA to communicate with CWSs about SDWA section 1433 requirements. Please update your primacy agency promptly if contact information changes for your CWS to ensure that you receive important information related to SDWA section 1433 from EPA.

5. If our CWS intends to use the same certifying official for the 2025-2026 compliance cycle as we did for the 2021-2022 cycle, can they use their old EPA Shared CROMERRR Services (SCS) account to electronically certify in 2025-2026?

If the certifying official from the last compliance cycle will serve in that capacity again, and electronic certification was previously used, the certifying official can use their existing EPA Shared CROMERRR Services (SCS) account to certify in the 2025-2026 cycle. The log in screen has a password reset option if the old password has been forgotten.

6. If the previous certifying official has left their job, how does the new certifying official proceed to certify when the next RRA and/or ERP recertification is due?

If a CWS has a new certifying official, the new official would simply create their own SCS account, following the steps in the <u>PDF document tutorial</u> or <u>video tutorial</u>. EPA can deactivate old SCS accounts upon request by emailing <u>awiaservicedesk@epa.gov</u>.

7. Does EPA have a copy of the RRA and/or ERP I submitted during the last compliance cycle?

CWSs were directed to sign and submit **certification statements** to EPA stating that the RRA and ERP had been completed and met all the requirements of SDWA section 1433. Thus, EPA only has the certification statement and does not have copies of CWS RRAs and ERPs. However, EPA retains the right to request a copy of the RRA and/or ERP for quality assurance and inspection purposes. It is the responsibility of the CWS to keep their RRA and ERP on file for a minimum of five years and to be able to provide EPA with a copy, if requested for these purposes.

Community Water Systems Required to Comply with SDWA Section 1433

 CWSs serving a population of 3,301 or greater are required to conduct and then certify that they have completed an RRA and ERP. How is EPA determining a CWS's population served for the current certification cycle?

EPA is using the population served number that each CWS reports to its respective state, federal, or tribal primacy agency for the <u>Safe Drinking Water Information System (SDWIS)</u>.

On March 31, 2024, one year prior to the start of the RRA certification cycle, EPA published a list of CWSs that must certify completion of an RRA and ERP to EPA during the 2025-2026 AWIA SDWA section 1433 cycle on EPA's AWIA SDWA Section 1433 Compliance Data webpage. This approach should provide CWSs with ample time to understand their applicable size category (small, medium, or large) and corresponding

Page **3** of **12**

Originally Published: April 2020

certification deadlines.

If a CWS increases or decreases in population served after March 31, 2024, the CWS would not move up or down in size category for that certification cycle. For example, if a CWS serves over 3,300 people according to SDWIS as of the list published on March 31, 2024, and then drops in population to 3,299 in April 2024, the CWS would still certify an RRA to EPA by the small CWS RRA deadline of June 30, 2026, and an ERP by the small CWS ERP deadline of December 31, 2026.

The calculation for a population served that each state or tribal primacy agency reports in SDWIS is typically up to the primacy agency's discretion. EPA will generally defer to a state's calculation of a CWS's population served. If EPA has any issue with the primacy agency population served estimate, EPA will first raise and resolve any such issue with the primacy agency through informal channels. If attempts to resolve any such issue with the primacy agency are unsuccessful, EPA reserves the right to independently determine the population served of the CWS. For information on how your primacy agency calculates population served in SDWIS, we recommend reaching out to the data collection office at your state or tribal department of environmental protection (DEP) or health agency.

2. How is the population served calculated for a CWS that has a seasonal or otherwise transient population served?

The calculation for a CWS with a seasonal or otherwise transient population served is generally up to primacy agency discretion. EPA will generally defer to a state's calculation of a CWS's population served. If EPA has any issue with the primacy agency's population served estimate, EPA plans to first raise and resolve any such issue with the primacy agency through informal channels. If attempts to resolve any such issue with the primacy agency are unsuccessful, EPA reserves the right to independently determine the population served of the CWS with a seasonal or otherwise transient population. For information on how your state calculates population served for CWSs with large seasonal or otherwise transient populations, we recommend reaching out to the data collection office at your state or tribal department of environmental protection (DEP) or health agency.

3. How does a wholesale or consecutive CWS calculate its population served with respect to the SDWA section 1433 RRA and ERP requirements?

When determining population served, wholesale CWSs should account for (i.e., include) the population served of the community or communities to which they serve water. SDWA section 1433 requirements also apply to those consecutive CWSs that individually serve less than 3,301 people, but their aggregate, total population served is greater than 3,300 people.

EPA interprets the phrase "Each community water system serving a population of greater than 3,300 persons" in section 1433 to mean any CWS that intakes, pretreats, treats, stores, and/or distributes water that reaches over 3,300 end users; this list is not exclusive and includes CWSs that oversee any processes related to that water, from source to end-point distribution, to over 3,300 end users. This interpretation is consistent with and derived from the list of requirements that RRAs and ERPs must cover, as established in SDWA section 1433(a)-(b).

Originally Published: April 2020 Last Revised: June 2024

4. How does SDWA section 1433 address small CWSs that serve 3,300 or fewer people?

SDWA section 1433(e) provides that "the Administrator [of EPA] shall provide guidance and technical assistance to community water systems serving a population of less than 3,300 persons on how to conduct RRAs and ERPs, and address threats from malevolent acts and natural hazards that threaten to disrupt the provision of safe drinking water or significantly affect the public health or significantly affect the safety or supply of drinking water provided to communities and individuals." Throughout 2024, EPA intends to provide live, online trainings for CWSs that serve populations of less than 3,301 people on how to use the Small Systems RRA Checklist to create RRAs and the ERP Template to prepare ERPs. In addition, EPA offers the Very Small Drinking Water and Wastewater System Resilience Continuing Education Unit (CEU) Program to encourage water systems not required by SDWA section 1433 to create RRAs and ERPs to do so. For more information, please visit the EPA webpage Resources to Promote RRAs and ERPs for CWS that Serve Less than 3,301, non-CWS, and Wastewater Systems.

5. Are transient non-community water systems or non-transient non-community water systems impacted by SDWA section 1433?

No, SDWA section 1433 only applies to community water systems (CWS), which are defined as public water systems that serve at least 15 service connections used by year-round residents of the area served by the system, or regularly serves at least 25 year-round residents. SDWA section 1401(15); 40 CFR 141.2.

Transient non-community water systems are public water systems that provide water in a place such as a gas station or campground where people do not remain for long periods of time. A non-transient noncommunity water system is a public water system that regularly supplies water to at least 25 of the same people for at least six months per year. Some examples are schools, factories, office buildings, and hospitals which have their own water systems. For more information about CWSs please visit this site: https://www.epa.gov/dwreginfo/information-about-public-water-systems

6. Should populations served by a CWS's emergency sources or connections be considered when calculating its SDWA section 1433 compliance service size?

No. Emergency connections are defined in this EPA memorandum as a source that is neither part of a public water system's routine or regular operation nor expected to be used on a seasonal or interim basis. An emergency source or connection is available if an unanticipated event or emergency should arise (e.g., maintaining pressure until a water main is repaired or replaced). Both year-round and seasonal systems may have emergency sources or connections. An emergency source or connection is one that would be used for a limited period (e.g., maintaining water pressure). Therefore, emergency sources or connections should not be considered when calculating a CWS's population served.

Community Water System Requirements

1. How do I, and how soon can I, submit a CWS RRA and ERP certification?

Please visit EPA's How to Certify webpage for more information on how to certify completion of a CWS RRA and ERP to EPA. EPA strongly recommends that you electronically submit your CWS RRA and ERP

Page **5** of **12**

Originally Published: April 2020

certifications. For step-by-step information on how to electronically certify, please see this <u>PDF document tutorial</u> or <u>video tutorial</u>.

You can submit your certification for the 2025-2026 cycle as early as March 31, 2024, but no later than the certification deadlines set forth in SDWA section 1433; see the Five-Year Recertification Deadlines table above (on page 2 of this document) for RRA and ERP certification submission deadlines. Please note that once a CWS certifies the completion of its RRA or ERP, they will be unable to electronically recertify for the next five-year RRA or ERP certification cycle until one year prior to the associated certification deadline date(s).

2. Who is qualified to be a certifying official for RRA or ERP completion on behalf of the CWS?

The certifying official should be a utility employee. Beyond that, each CWS should determine who the certifying official is for the RRA and ERP.

3. When certifying completion of a RRA or ERP using EPA's electronic certification system, can one User ID be used to certify for more than one CWS, as identified by a Public Water System Identification (PWSID) number?

Yes. You can use one User ID and password to certify the completion of multiple CWSs RRAs and ERPs with EPA's electronic certification system. When logging into the system, a user must identify a single PWSID number to move forward, then add a "Role", a level of administrative access. When the system asks you to "Choose a Partner," select "US EPA Office of Water" (Do NOT select your state primacy agency). When prompted to "Choose a Program Service," select "AWIA: Risk and Resilience Assessment and Emergency Response Plan Certification." Under "Choose a Role," select the only available option, "AWIA Certifier". Select "Continue". Then the user should enter in the additional PWSID that they would like to add to their account.

4. What specifically is meant by "financial infrastructure" in the RRA portion of SDWA section 1433?

Financial infrastructure of a CWS means utility billing, payment, and/or financial account management systems, including those operated by a third party on behalf of a utility. It does not include measures of financial stability, such as bond rating or asset and debt ratios.

5. Is the "construction of flood protection barriers" required within the ERP referring to temporary or permanent construction?

Flood protection barriers can be either temporary or permanent, depending on the findings and countermeasures identified in the utility's RRA. CWSs whose risk profile, as determined in their RRA, includes flooding should indicate in their ERP that they considered the following specific flood mitigation actions: 1) the development of alternative source water options; 2) the relocation of water intakes; and 3) the construction of flood protection barriers.

6. Do CWSs need to submit their RRA and ERP documents to EPA or do CWSs only need to submit the RRA and ERP certification statements?

Page **6** of **12**Originally Published: April 2020

CWSs should not submit their RRA and ERP documents to EPA as part of the certification process. Please visit EPA's How to Certify webpage for more information on how to certify completion of a CWS RRA and ERP. When you submit your certification to EPA, you are signing a document stating that the RRA or ERP conducted or reviewed by your utility meets all the requirements of SDWA section 1433. This is a self-certification process; however, EPA retains the right to request a copy of the RRA and/or ERP for quality assurance and inspection purposes.

Community Water System Compliance

1. My CWS is already required by our state regulations to create a document similar to an RRA or ERP under SDWA section 1443. Does development of this state assessment or plan satisfy the SDWA section 1433 requirements?

CWSs that have developed state risk assessment and/or response plans should **not** assume that these state plans contain all of the requirements specified in SDWA section 1433 – it is up to the CWS to check their state plans to ensure that all of the required elements under SDWA section 1433 are included. The SDWA section 1433 requirements for an RRA <u>can be found online here</u>, and the requirements for an ERP can be found online here.

Additionally, SDWA section 1433 requires certification by the CWS to EPA of RRA and ERP development/ update on established, recurring (every 5 years) deadlines. EPA has tried to work with applicable states to align their deadlines with those specified in SDWA section 1433; however, the CWS is ultimately responsible for ensuring the submission of certification statements to EPA by the appropriate deadline.

2. What is the penalty for a CWS that does not comply with the RRA and/or ERP certification deadline defined in SDWA section 1433?

If a CWS fails to conduct an RRA, develop an ERP, and/or certify completion to the Agency before the statutory deadlines, EPA may exercise its enforcement discretion to bring an action to require compliance and may also seek a civil penalty. Note that EPA exercises its enforcement discretion on a case-by-case basis.

Generally, pursuant to section 1414 of the Safe Drinking Water Act (SDWA), if EPA finds that a public water system does not comply with any "applicable requirement," the Agency may issue an order under subsection (g) or commence a civil action under subsection (b) to require the system to comply. Under SDWA section 1414, EPA also has the authority to seek a civil penalty not to exceed \$69,733 (adjusted annually for inflation) for each day in which such violation occurs. "Applicable requirement" is defined in SDWA section 1414(i) and includes any requirement of SDWA section 1433.

3. Are extensions of the compliance deadlines in SDWA section 1433 allowed?

No. In short, EPA cannot change the statutory deadlines in Section 1433. If a CWS fails to certify it has conducted the required assessment or plan preparation or revisions by the applicable deadline, then the CWS is in noncompliance. EPA has discretion in terms of how it responds to such noncompliance. In

general, under SDWA section 1414, whenever the Administrator of EPA finds that any public water system (including a CWS) does not comply with any applicable requirement, including the schedule for certification of assessments required by Section 1433, the Administrator may commence an enforcement action. For violations of an applicable requirement, the Agency may take enforcement action to require the system to return to compliance. EPA may also seek penalties for such violations under SDWA.

Please see this page for a list of resources and tools that can assist CWSs in complying with SDWA section 1433.

4. What is the relationship between AWIA section 2018 (e.g., chemical storage, release, and notification) and the RRA ERP requirements under AWIA section 2013/SDWA section 1433?

AWIA section 2018 amended the Emergency Planning and Community Right to Know Act (EPCRA), specifically sections 304, Emergency Release Notification, and 312, Hazardous Chemical Reporting. Currently, facilities that handle or store an extremely hazardous substance (EHS) under EPCRA or a hazardous substance (HS) under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) at specified threshold planning quantities (listed in regulation) are regulated by EPCRA. Under Section 304, if a facility spills an EHS at or above the reportable quantity (listed in regulation), the owner/operator must notify the State Emergency Response Commission (SERC) and Local Emergency Planning Committee (LEPC) immediately. If a facility spills a CERCLA HS, the owner/operator must also immediately notify the National Response Center in addition to notifying the SERC and LEPC. Under the EPCRA section 304 amendments in AWIA, a SERC that is notified must forward the initial notification and subsequent follow-up notification to the state drinking water primacy agency and the primacy agency must forward the notifications to any CWS whose source could be affected by the release.

In addition, AWIA section 2018 amended EPCRA section 312 to give CWSs the right to hazardous chemical inventory data (referred to a tier II inventory) for any facility subject to annual EPCRA reporting requirements that falls within that CWS's source water protection area. The CWS must make the request to the SERC or LEPC.

AWIA section 2013, which amended SDWA section 1433, also requires CWSs to coordinate with their LEPCs, to the extent possible, when preparing or revising their RRA and ERP. This coordination helps to ensure the ERP includes any chemicals used by the CWS and that the CWS has access to Tier 2 hazardous chemical inventory data and obtains release notifications required under EPCRA section 304. CWSs can use the Tier II chemical inventory information to update their RRA. They can also use the notification procedures and results of any potential chemical spill risk to update their ERP.

5. Are the SDWA section 1433 certifications and/or RRAs and ERPs subject to release pursuant to a Freedom of Information Act (FOIA) request?

The certifications, which are in the possession of EPA, are federal records subject to FOIA. The certifications are compliance data that may not be exempt from disclosure. Typically, RRAs or ERPs are not federal records and are therefore not subject to the FOIA.

FOIA requests submitted to a state or local government, and whether the certifications are subject to release pursuant to such a request, are governed by the applicable local law. The ERP required under

Page **8** of **12**Originally Published: April 2020

SDWA section 1433 has no special exemption under SDWA section 1433 from a state/local FOIA. However, SDWA section 1433 states the following regarding the RRA: "(5) PROVISION TO OTHER ENTITIES. —No community water system shall be required under State or local law to provide an assessment described in this section (or revision thereof) to any State, regional, or local governmental entity solely by reason of the requirement set forth in paragraph (3) that the system submits a certification to the Administrator."

Thus, a CWS's submission of its RRA certification to EPA for purposes of compliance with SDWA section 1433 does not by itself mean that such CWS must provide its RRA to any State, regional, or local governmental entity. Put another way, disclosure of a CWS's RRA certification to EPA does not require disclosure to any state, regional, or local governmental entity.

6. Are SDWA section 1433 RRA and ERP certifying officials' names and contact information exempt from release pursuant to a FOIA request?

While EPA will review records for any applicable exemptions, we recommend that certifying officials only include non-personal work email address and phone number.

Tools and Resources

1. How do I certify my RRA or ERP?

Please visit <u>EPA's How to Certify webpage</u> for more information on how to certify a CWS RRA and ERP. EPA strongly recommends that you electronically submit your CWS RRA and ERP certifications. For step-by-step information on how to electronically certify, please see <u>PDF document tutorial</u> or <u>video tutorial</u>.

2. What training or resources does EPA have available to assist CWSs with meeting the requirements under SDWA section 1433?

EPA has developed the tools and resources listed below to aid in complying with SDWA section 1433 requirements. Please note that EPA is currently updating our RRA, ERP and Baseline Information on Malevolent Acts guidance resources; the updated versions will be available later in Spring 2024.

RRA Assistance Resources

- <u>Baseline Information on Malevolent Acts for Community Water Systems</u> This resource can help you estimate the threat likelihood of various malevolent acts that could occur at your CWS.
- <u>Vulnerability Self-Assessment Tool</u> This resource is intended to help you develop a RRA meets the requirements of SDWA section 1433 (recommended for use by larger CWSs serving over 50,000 people).
- Small System Risk and Resilience Assessment Checklist This resource is intended to help you
 develop an RRA that meets the requirements of SDWA section 1433 (recommended for use by
 smaller CWSs serving under 50,000 people).

ERP Assistance Resource

Originally Published: April 2020

• <u>Emergency Response Plan Template and Instructions</u> - This resource is intended to help you develop an ERP that meets the requirements of SDWA section 1433.

Please see <u>recordings of past AWIA SDWA section 1433 workshops</u> if you would like a demonstration on how to use these assistance resources.

3. What resources are available to help address the required components related to cybersecurity in the RRA and ERP?

Cybersecurity must be addressed in both the RRA and ERP. SDWA section 1433(a) states that the RRA must include "electronic, computer, or other automated systems (including the security of such systems)." SDWA section 1433(b) states that ERPs must "incorporate findings of the [risk and resilience] assessment' and "shall include strategies and resources to improve the resilience of the system, including...cybersecurity." The ERP must address the vulnerabilities identified in the RRA, as well as the overall cybersecurity resilience of the CWS, which incorporates the steps of preparing for, responding to, and recovering from a cyber-incident. The following EPA cybersecurity resources can be used to address cybersecurity in the RRA and ERP:

- <u>EPA's Water Sector Cybersecurity Evaluation Program</u> EPA's third-party contractor will conduct a free cybersecurity assessment using EPA's Cybersecurity Checklist for water and wastewater systems to identify cybersecurity gaps and vulnerabilities. Utilities receive an Assessment Report and a Risk Mitigation Plan template in a secure file that can be added to their RRA.
- Water Cyber Assessment Tool (WCAT) The tool uses EPA's Cybersecurity Checklist to provide
 an easy-to use evaluation of cybersecurity practices at water and wastewater utilities that can
 be added to their RRA. The Tool includes an assessment workbook, assessment report, and a
 risk mitigation plan.
- <u>Cybersecurity Incident Action Checklist</u> This checklist can be used to help water utilities build a cybersecurity component to existing ERPs.

4. What tools are available to assist in conducting a financial infrastructure assessment, as required by SDWA section 1433?

The main, high-risk threat on financial infrastructure is "Cyber Attacks on Business Enterprise Systems," as identified in EPA's <u>Baseline Information on Malevolent Acts</u> document. This document provides information on estimating the threat likelihood, along with references to additional resources to reduce risk. Please see EPA's cybersecurity tools above for more information.

5. Which standards can a CWS use to comply with the RRA and/or ERP requirements?

SDWA section 1433 does not require the use of any standards, methods, or tools for the RRA or ERP. Your utility is responsible for ensuring that RRA and ERP address all the criteria in SDWA section 1433(a) and (b), respectively. EPA recommends the use of tools and standards, such as American Water Works Associations' J100-10 Risk and Resilience Management of Water and Wastewater Systems, EPA's Emergency Response Plan Template and Guidance, along with EPA's Vulnerability Self-Assessment Tool Web 2.0 or Small System Risk and Resilience Assessment Checklist to facilitate sound RRAs and ERPs.

Originally Published: April 2020

6. Can the current version (Web 3.0) of EPA's Vulnerability Self-Assessment Tool (VSAT) be used to conduct an SDWA section 1433-compliant RRA?

Yes. EPA's <u>Vulnerability Self-Assessment Tool Web 3.0</u> has been updated to meet the requirements of SDWA section 1433. EPA recommends that large and medium-sized CWSs use VSAT as a resource to complete an SDWA section 1433-compliant RRA.

7. Can I familiarize myself with VSAT without being tied to a specific utility, such as remaining anonymous, prior to using the tool for the CWS's RRA?

Yes. Any individual can use VSAT to develop a test utility and familiarize themselves with the tool.

Originally Published: April 2020

Funding Assistance

1. Is there funding available for conducting RRA and ERP to meet the SDWA section 1433 requirements?

Currently, there is no funding source that is specifically designated to address the SDWA section 1433 RRA and ERP recurring requirements. However, conducting a RRA and ERP is considered an eligible project under EPA's <u>Drinking Water State Revolving Fund</u> (DWSRF). The RRA and ERP may yield a project that the utility may want to invest in to improve the overall system resilience. Each state develops a list of priority projects for funding under the DWSRF, so please <u>check with your state</u> to see if they have set aside funds for this function specifically.

2. Are there grants or funding specifically available to small CWSs to meet the requirements under SDWA section 1433

Currently, no funding associated with SDWA section 1433 has been appropriated by Congress.

Contacts and Outreach

1. Who can I contact from EPA for more information about AWIA section 2013/SDWA section 1433 or AWIA 2018/EPCRA sections 304 and 312?

For AWIA section 2013/SDWA section 1433 or AWIA section 2018/EPCRA sections 304 and 312 questions, please email EPA at dwresilience@epa.gov.

2. Who can I contact from EPA for more information about the Emergency Planning and Community Right-to-Know Act (EPCRA)?

For specific questions related to EPCRA, reach out to EPA's Regional EPCRA contacts at https://www.epa.gov/epcra/epcra-regional-contacts.

3. Who can I contact if I need help with the Shared CROMERR Services (SCS) electronic certification system?

First, reference EPA's <u>PDF document tutorial</u> or <u>video tutorial</u>, which may be able to resolve the issue. If you need further help regarding the electronic certification process, call EPA's Help Desk at 888-890-1995 (select option two) or email <u>helpdesk@epacdx.net</u>.

Originally Published: April 2020 Last Revised: June 2024