



MISSISSIPPI STATE DEPARTMENT OF HEALTH

Date: 6/9/2020

To: Officials and Operators of Public Water Systems

From: MS State Department of Health
Bureau of Public Water Supply

Re: COVID-19 Pandemic Update #7, Operational Concerns in the Ongoing Response
Public Water System Update #1, Important Information for Public Water Systems

The Bureau hopes that this message finds you well and that the current situation has not hampered your abilities to provide vital services including safe drinking water. At the Bureau, we appreciate all you do to maintain this important service to your customers. The state of Mississippi has begun the reopening process of offices and businesses, with that reopening, your systems will have to react to changes that have come about due to COVID-19 while still handling the day-to-day management that has still has to be carried to maintain your system's compliance with the various provisions of the Safe Drinking Water Act.

Restoring Water Quality in Buildings with Low or No Use:

Previously, we informed you about guidance regarding water quality in buildings/residences with little or no use. As many businesses have reopened or will be opening soon, the guidance examines what should be done when those buildings/businesses that have been closed reopen. After its initial release the EPA has modified some of the guidance. The revised guidance and a supporting checklist are available at:

<https://www.epa.gov/coronavirus/information-maintaining-or-restoring-water-quality-buildings-low-or-no-use>

Security Risk and Resilience Assessments:

As you are aware the Bureau has been requiring the state's public water supplies to develop and maintain both a Security Vulnerability Analysis (SVA) and an Emergency Response Plan (ERP). The SVA's were intended to aid the public water systems in determining its vulnerabilities and the mitigating them for the protection of its water system and the customers that it serves. The ERP was to aid systems in developing strategies, resources, plans, and procedures water systems can use to prepare for and respond to various types of incidents. With the passage of the America's Water Infrastructure Act of 2018 (AWIA), community water systems serving a population greater than 3,300 are to perform a Risk and Resilience Assessment (similar to SVA) to identify vulnerabilities to potential malevolent acts and natural hazards. From that assessment, systems will develop or update their ERPs that incorporates findings of their risk and resilience assessment. With these statutory changes, public water systems will be required to certify that these assessments and plans have been completed directly to the Environmental Protection Agency. Furthermore, systems will need to recertify these assessments and plans every five years after the initial certification. To aid in completing the Assessments and ERPs, EPA has released new guidance, checklists, and templates to help states and the nation's water systems. For the Risk and Resilience Assessment:

<https://www.epa.gov/waterresilience/small-system-risk-and-resilience-assessment-checklist>

and here for the Emergency Response Plan:

<https://www.epa.gov/waterutilityresponse/develop-or-update-drinking-water-utility-emergency-response-plan>

With new AWIA requirements to the Safe Drinking Water Act, the updated templates reflect the required minimum standards by which the assessments and plans must meet. Using your existing assessment/plans, the time necessary to update the new templates should be reduced. As the certifications are submitted directly to the EPA, the law set certification deadlines for submission based on system population size and they are as follows:

Population Served	Risk & Resilience Assessment Submission Dates	Emergency Response Plans Submission Dates
≥100,000	March 31, 2020	September 30, 2020
50,000 – 99,999	December 31, 2020	June 30, 2021
3,301-49,999	June 30, 2021	December 31, 2021

One final note, regardless of system size and type, the Bureau will require both a Risk and Resilience Assessment and ERP to be maintained and updated annually. Failure to do so can result in the system receiving a significant deficiency during the sanitary survey.

Mississippi Public Health Laboratory (MPHL):

As we have previously made you aware, the MPHL has been transitioning its new environmental laboratory sampling application. This application works as a sampling manager to track samples through the collection and analyzation process to the eventual generation of results that will be provided to your system. As you are aware, the new application has been processing bacteriological and fluoridation sample for several months now. In phase 2, MPHL will be expanding sampling manager application for the processing of chemical samples. As this is a change to the existing process, the Bureau will be working to get this information out to you through various training opportunities.

Water Sector Help Masks for System Personnel

Recently the Department of Homeland Security and the Environmental Protection Agency have been able to secure cloth masks for the water sector to provide some level of personal protection. Working with the state and through our Rural Water Emergency Assistance Cooperative, we will be providing you an opportunity to obtain cloth masks for your key personnel. In a future notification, we will let you know where the points of distribution of those masks will be. It should be noted that the masks will not be N95 grade masks as those are still reserved for the healthcare providers, but these cloth masks should be able to provide some level of protection for your personnel.

Consumer Confidence Reports (CCRs):

As you recall, the Bureau of Public Water Supply (MSDH/BPWS) mailed the 2019 CCR packets to the Legally Responsible Official (LRO) of all Community Public Water Systems (PWS) on April 1, 2020. Violation notifications will be prepared on June 30, 2019, for all Community PWS's that have not delivered the CCR to their customers and to the Bureau. When submitting the CCR to the Bureau, don't forget to include your CCR Certification. If you have completed these actions, thank you for your efforts to keep your customers informed.

Sanitary Surveys/Inspections:

In the next few weeks depending on working conditions, regional staff will be reaching out to the systems that have sanitary surveys due for the calendar year to comply with the Safe Drinking Water Act's Ground Water Rule. Similar to previous sanitary surveys/inspections, regional staff will be looking at the critical elements of your water system. During these surveys, staff will be following CDC guidelines related to COVID-19 for your protection and theirs. Additionally, systems that are under current compliance plans, consent agreements, or administrative orders will be inspected to ensure that elements of those plans are still being performed.

For other updates visit our website.

MS State Department of Health www.HealthyMS.com

or <http://HealthyMS.com/covid-19>

Bureau of Public Water Supply emergency/after hours (769) 798-4258

Normal business hours 8am-5pm (601) 576-7518