Emergency Response Plan

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D. Wayne Loveday

2011 Date





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Section 1 Introduction

1.1 Purpose

The purpose of the Emergency Response Plan (ERP) is to identify KUB's response to routine and catastrophic emergencies within the wastewater collection system and within the wastewater treatment plants. Routine emergencies include, but are not limited to, overflowing manholes, line breaks, localized electrical failure, and pump station outages. Catastrophic emergencies include, but are not limited to, floods, tornados, earthquakes or other natural events, serious chemical spills, and certain widespread long term electrical failures.

1.2 Goals

The goal of the ERP is to develop procedures for KUB to follow in responding to a variety of emergency situations. It provides the framework KUB will use to:

- Minimize impact to public health
- Minimize impact or loss to customers
- Minimize adverse effects on the environment
- Minimize damage to the wastewater system
- Restore wastewater service after an emergency
- Provide guidance for notifying the public and/or regulatory authorities, as necessary
- Facilitate the development of a Vulnerability Study that will identify the effect of failure to operations, equipment, and public safety and health.

1.3 Plan Organization

The ERP is divided into four components: wastewater treatment plants (WWTPs), the wastewater collection and transmission system (WCTS), public notification of emergencies, and notification of regulatory authorities.

WWTPs – This component establishes standard operating procedures for use in emergency situations, including changes in process controls, occurring at any of the treatment plants. It also includes equipment, chemicals, and personnel necessary for responding to emergencies.

WCTS – This component establishes standard operating procedures for use in emergency operations; including identification of the actions staff should take in the event of emergency situations (specific to the type of emergency that could occur), criteria for initiating and ceasing emergency operations, identification of repair equipment.

Public Notification of Emergencies – This component establishes (in coordination with public health authorities): 1) the criteria to be used as the basis for notifying the public and other impacted entities, 2) a list identifying key KUB staff who are responsible for ensuring notification to the public as

described in the SORP, 3) a list identifying all public contacts who must be notified during an emergency situation, 4) a list identifying KUB staff who are authorized to make public statements during emergency situations, and 5) pre-scripted news releases for various types of emergency situations.

Notification of Regulatory Authorities – This component establishes (in coordination with public health authorities): 1) the criteria to be used as the basis for notifying regulatory authorities, the Tennessee Department of Environment and Conservation (TDEC), the City, and public health authorities of any emergency situation caused by a sanitary sewer overflow (SSO), Diversion, Bypass, or effluent limit violation, 2) a list identifying key KUB staff who are responsible for notifying the regulatory authorities, 3) a list identifying all officials who must be contacted, and 4) standard reporting forms.

1.4 Forms and Reference Documents

Standard forms and other pertinent documents can be found in the Appendices. Refer to the Table of Contents for the list of documents in the Appendix.

1.5 Philosophy of Development

The basis for the development of the ERP was to identify levels of incidents that will guide KUB in responding to emergencies of various magnitudes. While no response plan can specify the complete range of actions to be taken for all possible situations, some basic actions will be common to each type of emergency. Those involved in responding to emergencies will be required to use judgment in carrying out this plan and/or in their decisions to go beyond the basic approaches contained here. "Situational" management skills will take into consideration variables including, but not limited to, threat to the environment or public health and proximity of the situation to public areas.

Conditions encountered by those responding to emergency situations may require consultation with supervisory or management personnel to determine the appropriate level of response. As conditions worsen or improve, levels of response will be adjusted to ensure that the suitable emergency response is taken.

After emergency situations designated as Classification Level 1, 2, or 3 have subsided, KUB personnel will conduct a Root Cause Analysis or follow-up inspection to determine the cause of the situation, to verify that the appropriate actions were taken in response to the situation, and to assess what, if any improvements may facilitate faster response and restoration of operations/service. In the event that a Level 4 emergency occurs under extraordinary circumstances or the cause is not understood, KUB personnel may choose to conduct a Root Cause Analysis.

1.6 Classification of Emergencies

Emergency situations are classified in five levels with Level 5 being routine operations and Level 1 being the highest level of emergency.

Emergency Level	Description of Emergency Situation
Level 5 Normal	Normal, routine operations. Temporary or short-term outages and failures with no to low risk. Trouble calls and outages can be managed with normal resources and standard operating procedures
Level 4 Minor	Isolated outages, failures, and spills resulting in localized risk. Minor process problems that could impact effluent quality. Trouble calls and outages can be managed with normal resources instituting a change in operating procedures or managed with additional resources employing standard operating procedures.
Level 3 Moderate	Potential for outages, failures, and spills with significant localized risk or multiple minor failures distributed over the service area. Trouble calls and outages require additional resources and changes in process or procedures.
Level 2 Major	Events at numerous locations resulting in major effect to operations but not occurring system-wide. Major weather- related damage at localized areas. Spills and leaks exiting the plant. Damage from fire, accidents, or other events resulting in failure of critical equipment or pipe.
Level 1 Catastrophic	System-wide failure with expected long-term interruption requiring extraordinary resource assignments.

1.7 Description of the Wastewater System

The KUB wastewater system serves more than 68500 customers. KUB owns and maintains the network of pipes, manholes, and associated equipment that transports wastewater from homes and businesses to treatment plants through approximately 1320 miles of main lines.

1.7.1 Treatment Facilities

KUB owns and operates four WWTPs: Kuwahee, Fourth Creek, Loves Creek, and Eastbridge. Figure 1 shows the locations of all four WWTPs.

Kuwahee (NPDES Permit No. TN0023582) – Kuwahee WWTP, located at the second structure is an activated sludge facility that includes primary sedimentation, nitrification, final clarification, anaerobic sludge digestion, dewatering, and disinfection of all flows. Biosolids from each of the other treatment plants are processed at Kuwahee. The discharge from Kuwahee WWTP enters the Tennessee River at mile **Fourth Creek** (NPDES Permit No. TN0023574) – Fourth Creek WWTP, located at the second second

Loves Creek (NPDES Permit No. TN0021822) – Loves Creek WWTP, located at the second s

Eastbridge (NPDES Permit No. TN0061743) – Eastbridge WWTP, located at the sequencing batch reactor facility and includes disinfection of all flows prior to discharge. The discharge from Eastbridge WWTP enters the Holston River at mile



1.7.2 Pump Stations

In addition to the wastewater treatment plants, KUB currently operates over 60 wastewater facilities (pump stations, metering stations, storage facilities, and chemical injection sites) to move wastewater through force mains to the gravity mains or treatment plants. Table 1 lists these facilities and their addresses. Figure 1 also shows the locations of all the pump stations.

Each pump station is equipped with a Supervisory Control and Data Acquisition (SCADA) system that monitors the operation of the stations. The SCADA system will convey alarms to operators at the Kuwahee WWTP and Operations Dispatch Center when predetermined conditions are present at the station. Monitoring parameters include, but are not limited to, power failures, high wet well levels, and pump failures that could potentially cause overflows. The Wastewater SCADA Alarm Notification Quick Reference Guide is provided in Appendix J.

1.7.3 Interconnections With Other Utilities

KUB receives wastewater from two other utility districts: First Utility District and West Knox Utility District.

1.8 Operations Management Facilities

KUB's Customer Information Center (CIC) receives, records, and initiates response to customer inquiries or concerns through a dedicated phone number: 524-2911. CIC is staffed with representatives providing customer service 24 hours a day, seven days a week.

The System Operations Services (SOS) provides dispatching functions 24 hours a day, seven days a week. SOS receives field activities from the Customer Information System or other notification systems such as the Supervisory Control and Data Acquisition (SCADA) system and dispatches wastewater trouble orders to the appropriate KUB responder crew. Field crew orders are sent electronically to crews via the mobile data system.

 Table 1: Pump Station Addresses

KUB has established an additional SOS Center and a Customer Information Call Center at the Larry A. Fleming Operations Center. This emergency operations facility can be fully operational in the event that the Edwin C. Hoskins Power Operations Center becomes inoperable. Periodic testing of this operations facility ensures its functionality in the event of an emergency.

The Vulnerability Assessments completed for the treatment plants explore areas of vulnerability and determine the effect of failure to operations, equipment, and public safety and health from which KUB will maintain, develop, and implement programs.

1.9 Review and Update of the ERP

The ERP will be reviewed annually and updated as appropriate. The following components may be updated, as needed, on a more frequent basis:

- Contact persons and phone numbers
- Personnel lists
- Equipment lists
- List of contractors
- Standard Operating Procedures (SOPs).

Section 2 Wastewater Treatment Plants Emergency Response Plan

2.1 Reference Documents

Five SOPs for the Emergency Levels were developed as a blanket reference for specific SOPs directing operators' actions (Appendix A). In addition, the Process Controls Program (PCP) provides guidelines for process changes in the event of an emergency situation causing a diversion at Kuwahee, Fourth Creek and Loves Creek WWTPs. The Reporting, Notification, and Record-Keeping Program, as approved by the USEPA, includes standard forms used in recording process changes for diversion and/or bypasses during wet weather operations or emergency situations.

A Risk Management Plan was implemented in 1999 by KUB in accordance with provisions of 40 CFR Part 68 of the Clean Water Act Amendments. Updates to the plan have been made as required. All applicable regulations as required by EPA's Chemical Accident Prevention – 40 CFR Part 68 are also addressed in this plan and are based on OSHA's Process Safety Management (PSM). KUB has a separate PSM/RMP Program for each regulated facility. Both programs are based on maintaining above threshold quantity levels of the chemical Chlorine on site. In addition, a Chemical Response Plan was implemented in 2004 and integrated as an addition to the Risk Management Plan to address potential spills in all other major bulk chemicals at the facilities that are below threshold quantity levels. Copies of the Risk Management Plan are located at the Kuwahee WWTP, Fourth Creek WWTP, and Loves Creek WWTP. All documentation is also maintained off-site on a secure Intranet website that is access controlled.

The Building Emergency Action Plan (Appendix B), as part of the Risk Management Plan, provides guidelines for actions to be taken by staff in the event of an emergency within the treatment plants. Facility maps from the Risk Management Plan that show where chemicals are located within the treatment plants can be found in Appendix C. A Chemical Spill Response sheet is posted at the chemical storage location as a quick reference for the operator who is responding to the incident. These sheets are included in Appendix D. Personnel roles during an incident are defined within Risk Management Plan along with a contact list for properties located adjacent to the treatment plants. A table listing those properties adjacent to KUB plants is in Appendix E.

The KUB Biosolids Environmental Management System (BEMS) is the source of additional information on the handling of biosolids. Incidents that occur related to the transport of biosolids from the Kuwahee Wastewater Treatment Plant will be managed under the contractor's Biosolids Spill Response Plan.

2.2 Personnel

The wastewater treatment plants are staffed with operators, technicians and supervisors. Refer to Appendix F for current plant staffing levels and Appendix G for employee listings at the plants.

2.3 Equipment

The WWTPs maintain a list of equipment and supplies for use in emergency situations. The list includes the appropriate response and responsible party. A copy of this list is included in Appendix H.

2.4 Returning to Normal Operations

As soon as practicable after normal operation is achieved, responsible personnel will conduct an inspection of all facilities affected by the outage or failure, including those adjacent thereto. This inspection will ensure that all process equipment is operating normally; that structural equipment is undamaged; and piping is free of leaks and pipe integrity is not comprised. Protocol for water quality testing is outlined in the Water Quality Monitoring Program. Additionally, reporting as defined in the Process Controls Program, Reporting Notification and Recordkeeping, Sewer Overflow Response Plan (SORP), and as required by regulatory agencies will be ensured.

Section 3 Wastewater Collection and Transmission System Emergency Response Plan

3.1 Reference Documents

Five SOPs for the Emergency Levels were developed as a blanket reference for specific SOPs directing technicians' actions (Appendix I). The SORP, as approved by the USEPA, provides direction for dispatching trouble calls and responding to trouble calls within the collection system. The SORP lists resources for responding to SSOs and pump station trouble calls as well as available equipment. Information related to releasing public information, news releases, and regulatory authority notification is also included in the SORP. The Wastewater SCADA Alarm Notification Quick Reference Guide (Appendix J) lists the various alarms and status conditions. It is a reference for determining the significance of the alarm being displayed and taking the appropriate action.

Station Management Services - Pipes (SMS-P) monitors the operation of KUB's wastewater lift stations, wastewater storage facilities, wastewater metering facilities, and wastewater chemical injection facilities. SMS-P relies on their Standby List when calling in additional resources. Examples of the SMS-P Standby List and Employee List are found in Appendix K. The Wastewater Facility Information listing provides contingency information and detailed specifications, including required response time and emergency equipment, for each of the 63 wastewater lift stations, 4 wastewater storage facilities, 3 wastewater metering facilities, and 2 wastewater chemical injection facilities (Appendix L). Oxy-Six (Calcium Nitrate) is used at 15 of the lift stations and Oxygen (Liquid) is utilized at the 2 chemical injection facilities. A Material Safety Data Sheet is posted at each and is provided in Appendix D of this document for reference.

Standby Guidelines (Appendix M) and an Emergency Response Schedule for responding personnel are developed on an annual basis for both Underground Construction Technicians and System Operations Technicians. The Standby Schedule is provided to Systems Operation Dispatch to facilitate faster response in an emergency. The Emergency Response Schedule undergoes frequent review and modification throughout the year due to staffing changes, schedule conflicts, etc. and is provided as an example in Appendix N. The Standby List for 2011 is provided as an example in Appendix O. A list of qualified contractors who are available to respond in the event of an emergency is maintained by the Procurement Department.

3.2 Personnel

The Underground Construction Department's Preventive Maintenance Team is divided into four crews that respond to a variety of tasks within KUB's WCTS. The Emergency Response crew is responsible for locating wastewater service mains and laterals; televising sewer mains, laterals and manholes; clearing obstructions in lines, manholes, and drains; responding to, repair, and/or clean-up of SSOs; and detecting wastewater leaks. SSO response is considered to be the highest priority. These crews, as well as other Underground Construction crews, can be called in during an emergency. Orders for responding to a potential SSO location are dispatched to crews via KUB's Intergraph Mobile Data System. The SOS Lotus Notes database is used to input information regarding SSOs for resolution tracking. Screen shots from this system and an example of a Mobile Data field activity for responding to an SSO are included in Appendix P.

3.3 Repair Equipment

The Emergency Response Crew has a variety of equipment available to respond to trouble calls in the collection system. These include vacuum trucks, personnel transporting vehicles, camera equipment, and construction equipment for accessing pipelines. A sample listing of this equipment can be found in Appendix Q.

3.4 Returning to Normal Operations

As soon as practicable after normal operation is achieved, responsible personnel will conduct an inspection of all facilities affected by the outage or failure, including those adjacent thereto. This inspection will ensure that all equipment is operating normally; that structural equipment is undamaged; and piping is free of leaks or comprised integrity. Protocol for water quality testing will be outlined in the Water Quality Monitoring Program when it is approved by the USEPA. Additionally, reporting as defined in the SORP, and as required by regulatory agencies will be ensured.

Section 4 Public Notification of Emergencies

KUB personnel will determine the level of emergency that will result in internal communication to the appropriate management and support personnel. Depending on the level of emergency and risk to public health, various contacts and communication will be made.

4.1 Media Contacts and News Releases

The Communications Department maintains a list of media contacts used for public announcements and press releases (Appendix R). They, with advisement of the Executive Staff, are responsible for contacting the media with information that is to be released to the public. Personnel within the management structure receive training and assistance from Communications when making statements to the public regarding events occurring within the collection and treatment system. These individuals form the Gavel Duty roster (Appendix S). The Gavel manager receives media calls from switchboard personnel after hours.

Press releases may be issued under extraordinary circumstances if KUB deems appropriate given the particulars of the specific situation. KUB will consult with the appropriate local public health authorities and take under

advisement their recommendations for public notification. Examples of such press releases for various emergency situations are provided in Appendix T.

4.2 Public Notification

Public advisories for Level 4 and Level 5 emergencies will follow those outlined in KUB's SORP. Signage, barricades, door hangers, and other means of communication will be employed as appropriate to protect the public and limit public access to areas affected by overflows or other events in the WCTS. Public notification for Levels 1, 2, and 3 will be made after consultation with KUB's Executive Staff and/or the appropriate public health authorities.

4.3 Coordination with Health Authorities

Table 2A outlines the public notification protocols for Emergency Levels 5 through Level 1. Table 2B includes the agencies and groups that could be notified depending on the Emergency Level. KUB has established these emergency communication protocols in coordination with the Knox County Public Health Department (KCHD) and will meet as needed with the KCHD to review the notification scenarios for each Level.

KCHD will receive KUB's email notification of all reported SSOs. This communication will facilitate public assurance that any SSO reported to KCHD is being addressed by KUB. KCHD will be directly notified of any event classified as a Level 1 through Level 3 emergency using the contact numbers in Table 2B. KUB will notify the County Director of Environmental Health and the County Environmental Epidemiologist directly to exchange information and assess potential health risks. Any public notification prepared by KUB will be shared with KCHD to ensure consistency in the guidance provided to the community by both organizations. As conditions change, KUB will update KCHD contacts on the current situation and maintain this communication until the situation is resolved.

Emergency Level	Description of Emergency Situation	Public Notification
Level5 Normal	Normal, routine operations. Temporary or short-term outages and failures with norisk to low risk. Trouble calls and outages can be managed with normal resources and standard operating procedures	If any public notification is needed, the SORP Public Advisory Procedures will be followed for areas of localized impact.
Level 4 Minor	Isolated outages, failures, and spills resulting in localized risk. Minor process problems that could impact effluent quality. Trouble calls and outages can be managed with normal resources instituting a change in operating procedures or managed with additional resources employing standard operating procedures.	Follow Public Advisory Procedures described in the SORP for any impacted public areas. Email notification of SSOs will also be provided to the Knox County Public Health Department (KCHD) and Tennessee Department of Environment and Conservation (TDEC).

Table 2A - Public Notification Protocols for Wastewater Emergencies

Level 3 Moderate	Potential for outages, failures, and spills with significant localized risk or multiple minor failures distributed over the service area. Trouble calls and outages require additional resources and changes in process or procedures.	Immediate notification of conditions to the KCHD and TDEC contacts noted in Table 2B. SORP Public Advisory Procedures must be followed and communications with local media will be used if necessary to ensure the public is made aware of the impacted areas.
Level 2 Major	Events at numerous locations resulting in major effect to operations but not occurring system-wide. Major weather- related damage at localized areas. Spills and leaks exiting the plant. Damage from fire, accidents, or other events resulting in failure of critical equipment or pipe.	Immediate notification of conditions to the KCHD and TDEC contacts noted in Table 2B. SORP Public Advisory Procedures must be followed and communications with local media will be used if necessary to ensure the public is made aware of the impacted areas. KUB would also issue a News Release to local media outlets similar to those included in Appendix T of the ERP.
Level 1 Catastrophic	System-wide failure with expected long-term interruption requiring extraordinary resource assignments.	Immediate notification of all agencies listed in Table 2B. KUB will issue a News Release to local media outlets to ensure widespread communication of situation and advise the public of potential risks. Catastrophic situations may require public notification in coordination with various Emergency Management Agencies at the local, state or federal level depending on potential impact.

Table 2B External Notification List

Local Agencies	Contact Numbers
Knoxville Police Department	911
Knox County Sheriff's Department	911
Fire Department	911
Ambulance	911

Power Supplier	
Tennessee Valley Authority	632-2101

City Agencies	
Emergency Management Agency	215-2297

County Agencies	
KCHD Director of Environmental Health	215-5200
KCHD Environmental Epidemiologist	215-5242
KCHD Pager Line	597-2671

State Agencies	
Tennessee Department of Environment and Conservation – Water Pollution Control	594-6035
Tennessee Wildlife Resources Agency	1-800-332-0900

Local Non-Profit Organizations	
Tennessee Clean Water Network	522-7007

4.4 SSO Notification

The SSO notification process is outlined in the SORP Workflow, which can be found in Appendix U. A list of KUB personnel and outside agencies notified during an SSO event may be found in Appendix V. The Risk Management Plan contains a contact list for properties located adjacent to the treatment plants should an emergency within the plant necessitate notification of those parties. These can also be found in Appendix E.

4.5 Chemical Spill Notification

Emergency Chemical Spill Response postings at all treatment plants and at pump stations where applicable provide the operator with the appropriate Emergency Contact Information for each hazardous chemical utilized in the treatment process. Those postings are included in Appendix D.

Section 5 Notification of Regulatory Authorities

The standard reporting procedure for reporting Level 4 and Level 5 events will be an e-mail notification to the TDEC Knoxville Environmental Assistance Center, with a follow-up e-mail within five days of closure. Levels 1 through 3 will merit an immediate telephone call to TDEC in addition to the e-mail notification.

The SORP contains the SSO regulatory notification guidelines. The Tennessee Department of Environment and Conservation is notified immediately, within five days of closure, and monthly via the Discharge Monitoring Report.

NPDES Permits outline the monthly reporting requirements for SSOs, diversions, bypasses, and effluent limit violations.

The Collections System Improvement staff is responsible for notifying regulatory authorities of events within the collection system. The Plant management staff is responsible for notifying regulatory authorities of events within the treatment plants.

Section 6 Implementation Schedule

ERP Section	Task	Implementation Date
Section 1.2	Draft Vulnerability Study	Completed
Section 3	Review and develop Preventive Maintenance Team Function guidelines into SOPs	Completed
Section 3	Develop specific SOPs for pump station electrical outages and mechanical failures	Completed

Below is the implementation schedule for components of the ERP.

Appendices

Appendix A

Wastewater Treatment Plant Emergency Response Plan SOPs

Wastewater Treatment Plant Emergency Response Plan SOPs

Appendix B

Building Emergency Action Plan

Building Emergency Action Plan

Appendix C

WWTP Facility Maps

WWTP Facility Maps

Appendix D

Emergency Chemical Spill Response Sheets

Emergency Chemical Spill Response Sheets

Appendix E

Properties Adjacent to KUB Facilities (Appendix F from Risk Management Plan)

Properties Adjacent to KUB Facilities

Appendix F

Current WWTP Staffing Levels

Current WWTP Staffing Levels

Appendix G

WWTP Employee Listing

WWTP Employee Listing

Appendix H

WWTP Emergency Response Equipment & Supplies

KUB's internal Emergency Response Plan contains WWTP Emergency Response Equipment & Supplies

Appendix I

Collection System Emergency Response Plan SOPs
KUB's internal Emergency Response Plan contains Collection System Emergency Response Plan SOPs

Appendix J

Quick Reference Guide: Wastewater SCADA Alarm Notification

Quick Reference Guide: Wastewater SCADA Alarm Notification

Appendix K

SMS Standby List and Employee List

SMS Standby List and Employee List

Appendix L

Wastewater Pump Station Information and Emergency Equipment

Wastewater Pump Station Information and Emergency Equipment

Appendix M

UGC Standby Guidelines & Lead Responder SOP

KUB's internal Emergency Response Plan contains UGC Standby Guidelines & Lead Responder SOP

Appendix N

UGC Emergency Response Schedule

UGC Emergency Response Schedule

Appendix O

UGC Standby List - 2011

UGC Standby List

Appendix P

Screen Shots for SOS Database and Wastewater Trouble Calls

Screen Shots for SOS Database and Wastewater Trouble Calls

Appendix Q

Wastewater Equipment List

Wastewater Equipment List

Appendix R

Media Contact List

Media Contact List

Appendix S

Key KUB Media Contact List

Key KUB Media Contact List

Appendix T

Pre-Scripted News Releases

Pre-Scripted News Release

Appendix U

SORP Workflow

SORP Workflow

Appendix V

SSO Notification List

SORP Notification List