City of Valdosta

Wastewater Utilities

Emergency Response Plan

Withlacoochee Water Pollution Control Plant (WPCP)

Emergency Response Plan (ERP)

VALDOSTA
A City Without Limits

Please fill in the information below as indicated.

NPDES ID#	GA0033235
Street Address	3180 Wetherington Lane
City, State Zip Code	Valdosta, Ga. 31603
Phone number	229-333-1857
Population Served/Users	56,600+/23,000+
Prepared by	K. Martin
Reviewed by	David Frost
Date completed	10/13/21

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CHANGE HISTORY

Please describe the changes made to this plan since its original development, who made the changes and on what date the changes were incorporated into this plan.

DESCRIPTION OF CHANGE	NAME/TITLE	DATE
Changes of contact personnel, updates on procedures	K. Martin	10/20/23

Developed: 10/13/21

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1.0 UTILITY INFORMATION

1.1 WPCP Overview

Information	
NPDES ID#:	GA0033235
Utility name and address:	Withlacoochee Water Pollution Control Plant 3108 W etherington Lane Valdosta, Georgia 31603
Owner:	City of Valdosta
Directions to utility from major roadway, include lat./long. Coordinates:	WPCP is located off of US Highway 84,
Total population served and total service connections:	56,500+ and 23,000+
Size: (MGD)	12.0 MGD ADF
Name, title, phone number of primary contact (e.g., ERP Lead):	William “Ricky” Cornelius, Plant Superintendent, (229) 292-0842
Alternate contact:	Joseph “Mike” Duval, Asst. Plant Superintendent, (229) 232-9332
Location of treatment, collection schematics and operation manuals:	WPCP Superintendent’s Office, Utilities Administration Office, GIS Division

1.2 General Information

Commissioned in Spring 2016, the new Withlacoochee WPCP provides the city with a state-of-the-art wastewater treatment for an ADF of 12 MGD, with the capability to treat peak flows of 18 MGD. When high flows require the use of the six-million-gallon equalization basin, the plant can treat a peak hourly flow of 38 MGD. In November/2020, an additional EQ basin (7.26 MG) was completed and placed into operation. The new plant uses a Sequencing Batch Reactor (SBR) System to treat wastewater while effectively removing nutrients and reducing phosphorous. The SBR system utilizes the activated sludge process, the most advanced biological treatment method used to treat domestic wastewater. As opposed to the conventional activated sludge process, in which wastewater treatment takes place in various, linearly arranged tanks, the SBR process occurs sequentially in the same tank. The SBR process is extremely flexible and suited to all types of wastewater and plant capacities.

Treatment begins at the plant headworks where mechanical bar screens remove sticks, plastics, and other large solids from incoming raw wastewater (influent.) The wastewater then enters one of the four SBRs to begin the activated sludge process. There, in a carefully controlled environment, the wastewater is mixed with air and live bacteria to oxidize organic material and remove inorganic solids through adsorption. After settling for solids removal, the partially treated wastewater then enters a process known as a tertiary treatment, where it is filtered through a cloth media disk filtration system. Finally, treatment includes disinfection with hypochlorite followed by chemical neutralization (dechlorination) to remove residual chlorine before the treated wastewater (effluent) is dispersed into the Withlacoochee River.

Treatment Plant Operation and Maintenance (O/M):

The operation of the treatment plant is 24/7, with three eight-hour shifts.
All treatment plant operators are certified State of Georgia Wastewater Treatment System Operators.
All the maintenance at the facility is performed by Central Maintenance (CMMS) personnel.

1.3 Personnel Information

Listed below by Division are the City of Valdosta Utilities Department personnel that would respond to incident/emergency at Withlacoochee WPCP or in Wastewater Collection system.

Utilities Department Administration Personnel

Name and Title	Job Duties and Responsibilities	Contact Information
Jason Barnes, Interim Utilities Director	Manage and direct the operations and maintenance of the City's water and wastewater systems.	Cell: (229) 251-1794 Office (229) 259-3592
Jason Barnes, Assistant Utilities Director	Assist Director in managing and directing the operation and maintenance the City's water and wastewater systems. Responsible charge of department when Director unavailable.	Office (229) 259-3592 Cell: (229) 251-1794
Shuntel Ward, Utilities Admin. Coordinator	Manage and direct clerical and administrative duties and coordinate general administration of Utilities Department.	Cell: (229) 251-2140 Office (229) 259-3592

Withlacoochee WPCP Operations Supervisory Personnel

Name and Title	Job Duties and Responsibilities	Contact Information	Emergency Information
William "Ricky" Cornelius, Plant Superintendent	Manage all operations of WWTP- Class 1 Operator	Office: (229) 333-1857	Cell- (229) 292-0842
Joseph "Mike" Duval, Asst. Plant Superintendent	Manage all operations of WWTP-Class 2 Operator	Office: (229) 333-1857	Cell- (229) 232-9332

Central WW Laboratory Supervisory Personnel

Name and Title	Job Duties and Responsibilities	Contact Information	Emergency Information
Quillen Peeler, Lab Supervisor	Manage all operations of Wastewater Laboratory	Office: (229) 333-1855 Alt. No. 229-259-5422	Cell-(229) 548-6050

Central Lines (Water Distribution/Collection System) Supervisory Personnel

Name and Title	Job Duties and Responsibilities	Contact Information
Sheldon Irvin, Superintendent	Manages and supervises the Central Lines Division on assigned projects or activities of water distribution construction, installation, and maintenance.	Cell: (229) 460-6201 Office: (229) 259-3592
Leo Warner, Asst. Superintendent	Assist in managing and supervising the Central Lines Division on assigned projects or activities of water distribution construction, installation, and maintenance. Responsible for Division when Superintendent unavailable.	Cell: (229) 251-0251 Office: (229) 259-3592
Terrial Small, Supervisor	Manges and supervises crew-leaders and crews on assigned projects or activities of water distribution construction, installation, and maintenance.	Cell: (229) 251-4658 Office: (229) 259-3592
Cedric Saunders Supervisor	Manges and supervises crew-leaders and crews on assigned projects or activities of water distribution construction, installation, and maintenance.	Cell: (229) 561-7483 Office: (229) 259-3592

Central Maintenance Division Supervisory Personnel		
Name and Title	**Job Duties and Responsibilities**	**Contact Information**
Randy Jones, Superintendent	Responsible for managing and directing the Central Maintenance Division which provides maintenance and repairs of City's water treatment plant and water system, wastewater treatment plants and collection systems.	Cell (229) 561-2504 Office: (229) 259-3592
Rilley Black, Asst. Superintendent	Assist Superintendent managing and directing all activities associated with the Central Maintenance Division. Responsible charge of Division when Superintendent unavailable.	Cell (229) 460-2838 Office: (229) 259-3592
Emily Arnold, Electrical System Supervisor	Supervises and participates in all maintenance/repair of electrical and instrumentation systems of City's water treatment plant and water system, wastewater treatment plants and collection systems.	Cell (229) 560-2695

GIS Division Personnel		
Name and Title	**Job Duties and Responsibilities**	**Contact Information**
GIS Coordinator	Managing and directing GIS (Geographic Information System) Division	Office: (229) 259-3592
John Piper, GIS Tech	Performs a variety of technical office and field duties updating, maintaining, and analyzing the Department's GIS and utility infrastructure data using GIS, database and information management applications.	Cell: (229)292-3611 Office: (229) 259-3592

Central Warehouse Supervisory Personnel		
Name and Title	**Job Duties and Responsibilities**	**Contact Information**
Deonna James, Supervisor, Central Warehouse	Maintain an adequate stock of common materials as well as specialty items that are required to maintain the water mains, hydrants, and services and other infrastructure of the water system. House the material and maintain a system to locate and disburse all items as needed and account for the cost of materials used.	Office: (229) 259-3593

1.4 Wastewater System Components

Lift stations in the Withlacoochee service area

Wastewater Lift Stations

Lift Station Name/#	**Location/ address**	**Lift Station information** ATS (Automatic Transfer Switch)
Big Country Club - LS03	3353 Plantation Dr.	Two pumps; onsite generator with ATS
Highway 84 - LS06	2106 W. Hill Ave.	Two pumps; onsite generator with ATS
Highway 94 - LS07	1423 N. St. Augustine Rd.	Two pumps; onsite generator with ATS
Hyde Park - LS09	1509 Weaver St.	Two pumps; onsite generator with ATS
Goodyear - LS10	4119-B. Bemiss Rd.	Two pumps; access for portable pump
Mack Drive Station - LS11	606 Howellbrook Dr.	Two pumps; onsite generator with ATS
South Forty - LS14	4215-C South Forty Rd.	Two pumps; access for portable generator
Boy and Girls Club - LS18	3658 Lake Laurie Dr.	Two pumps; onsite generator with ATS
Big Cherry Creek #1 - LS20	3953 Cherry Creek Rd.	Two pumps; onsite generator with ATS
Little Cherry Creek #2 - LS21	1122 Ridge Road	Two pumps; onsite generator with ATS
Remer Master Station -LS22	1834 Remer Lane	Four pumps; Diesel Generator/ATS
Gornto Rd. Master Station -LS23	2412 Gornto Rd.	Four pumps; Diesel Generator/ATS
Ridge Road/Little Cherry Creek #3 - LS24	1033 Ridge Road	Two pumps; onsite generator with ATS
City Hall - LS29	216 E. Central Ave.	Two pumps; access for portable generator
Northfield Site - LS30	2905 Northfield	One pump; access for portable generator
Wilkes Circle - LS31	#5 Wilkes Circle	Two pumps; access for portable generator
Berkley - LS32	2502 Berkley Dr.	One pump; access for portable generator
VCI - LS34	3130 Val Tech Rd.	Two pumps; onsite generator with ATS

WPCP Treatment Processes

Plant Headworks (solids and grit removal)

Two Equalization (EQ) Basins (13.25 MG capacity)

Sequencing Batch Reaction Process (Four reaction basins)

Tertiary Filtration System (Cloth Filters)

Sodium Hypochlorite Disinfection with Dechlorination

Solids Handling and Dewatering Systems (Aerated digestor, Belt press)

Treatment Chemical Storage Facilities

Location	Chemical(s)	Comments
Disinfection area	Sodium Hypochlorite Bleach (6800 gal. tank)	This is 12.0% bleach solution used for disinfecting non-potable water pumped from plant effluent for use in plant.
Disinfection area	Sodium Bi-sulfite (1800 gal. tank)	This chemical is used to dechorinate effluent.
Belt Press Area	Polymer (220 gal. totes)	This is used plant belt press operation

Other Key Chemical Storage Areas

Location	Function	Comments
Diesel Generator Area	Diesel for Emergency Generator (2000 gal. tank)	Maintenance personnel treat Diesel periodically.

1.6 Safety

Safety Materials	
Type	**Location**
Material Data Sheets (MDS's)	Plant Operations room and Water lab
Emergency eyewash and showers	Locations throughout plant
Emergency PPE	Operations Building and Maintenance Shop; Utilities Warehouse
Other equipment (note what is present at each location)	

Safety Information	
Topic	**Description**
Wind speed	Utility personnel may not work outdoors when the sustained wind speed is 35 mph or greater.
Safety Plan	Refer to Utilities Department Safe Practices Handbook.

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1.6 Response Resources

Resources

The Central Warehouse Division maintains an adequate stock of common materials as well as specialty items that are required to maintain the water mains, hydrants, and services and other infrastructure of the water system in an emergency.

Emergency Equipment on hand for emergency wastewater management:

- Two portable 6” diesel fueled bypass pumps; both are medium head capable.
- Three portable 4” diesel fueled dri-prime medium head bypass pumps.
- One portable 4” diesel fueled double diaphragm bypass pump: low head capable.
- One portable 4” gasoline fueled bypass pump: medium head capable.
- One portable 2” gasoline fueled bypass pump: medium head capable.
- Two submersible 2” 120-volt sump/sewage/dewatering pumps.
- One 153kW voltage and phase selectable portable diesel generator.
- One 80kW voltage and phase selectable portable diesel generator.
- Two 63kW voltage and phase selectable portable diesel generators.
- One each 5.5kW, 6.5kW 240/120 volt, and two 5kW 240/120-volt portable gasoline generators. These are used for two E1 stations, 120-volt control power backup, and small sump pump backup.
- Approximately 200’ of flexible bypass pump hose with camlock quick connectors. Various camlock equipped hose adapter fittings available for hose connections.
- Two 100-gallon diesel fuel trailers with 12-volt transfer pump for refueling deployed generators and pumps. Any available pickup truck can tow this.
- One 60-gallon diesel fuel transfer tank with transfer pump installed in pickup truck 1430 for deployed generator refueling.
- Diesel fuel transfer pumps installed on two 8500-gallon generator tanks for refueling smaller diesel generators and pumps. These fuel tanks provide all diesel fuel for diesel fueled emergency equipment. The diesel fuel is treated with FQS 1.5 biocide, FQS LTSA-35A stabilizer (https://www.fqsinc.com/) and routinely tested/polished to maintain a reliable emergency equipment fuel source. Fuel quality is tested routinely with a field Bug Alert test kit provided by Fuel Quality Services (FQS). Water and particulate analysis is also accomplished annually.
- One trailer capable of handling two 55 gallon and two 30-gallon diesel fuel drums with 12 volt transfer pumps.
- Fuel account at Langdale Fuel on Madison Highway as backup source for diesel fuel and gasoline in the event of city fuel island pump failure.
- Two service trucks with cranes available for pump removals and installations.

Emergency Phone Numbers for Equipment Rental or Service:

1. United Rentals: 229-242-1774
2. Sunbelt Rentals: 229-588-7095
3. Preferred rentals: 229-671-4264
4. Xylem-Godwin Pumps: 912-577-1268

1.7 Key Local Services

Essential Services

Facility	Location/Description
South Ga. Medical Clinic	2501 N Patterson St, Valdosta, GA 31602 See below

Link for SGMC Main Campus map: 30.862368, -83.289021

2.0 RESILIENCE STRATEGIES

This section contains strategies and resources to improve the resilience of the system, including the physical security and cybersecurity of the system.

2.1 Emergency Response Roles

In an emergency, system personnel should know where to report, to whom they report, and what their responsibilities are during an emergency response. A Chain of Command establishes lines of authority that preserve order and prevent confusion. The chain-of-command document is another essential part of an ERP. Check this document at least quarterly to confirm the accuracy of personnel and phone numbers. (See contact information in Section 1.3.1 Internal Communication)

Designated Emergency Response Personnel

Name/Title	Emergency Response Role	Responsibilities
Jason Barnes, Interim Utilities Director	Emergency Response (ER) Lead	Responsible for all incident response activities, including developing strategies and tactics and ordering and releasing resources.
Jason Barnes, Asst. Utilities Director	Alternate ER Lead	Perform duties as assigned by ER Lead; assumes duties listed above when ER Lead is not available.
William Cornelius, Withlacoochee WPCP Superintendent	Response/Damage Assessment Team	Withlacoochee WPCP operations during emergency
Joseph Duval, Withlacoochee WPCP Asst. Supt.	Response/Damage Assessment Team	Withlacoochee WPCP operations during emergency
Ken Lowe, Mud Creek WPCP Superintendent	Response/Damage Assessment Team	Mud Creek WPCP operations during emergency
Max Ahner, Mud Creek WPCP Asst. Supt.	Response/Damage Assessment Team	Mud Creek WPCP operations during emergency
Philip Walker, WTP Superintendent	Response/Damage Assessment Team	Valdosta WTP operations during emergency
Sheldon Irvin, Central Lines Supt.	Response/Damage Assessment Team	Distribution and Collection System repair/maintenance during emergency
Leo Warner, Asst. Central Lines Supt.	Response/Damage Assessment Team	Distribution and Collection System repair/maintenance during emergency
Randy Jones, Supt. Central Maintenance	Response/Damage Assessment Team	Supervise maintenance/repair during emergency at WTP, WWTP's and Lift Stations
Joseph Gangler, Environmental Mgr.	Response/Damage Assessment Team	Manage environmental concerns, (spills/overflows) during emergency
John Piper, GIS Tech	Response/Damage Assessment Team	Assist with locating and mapping during emergency
Shuntel Ward, Utilities Admin Coordinator	Response/Damage Assessment Team	Manage, direct clerical and administrative duties and coordinate general administration of Utilities Department during emergency.

2.2 Incident Command System (ICS) Roles

In a major disaster, emergency or terrorist act, the ER Lead may need to initiate and/or defer to an Incident Command System (ICS). ICS is the model tool for coordinating the response efforts of several agencies as they work an emergency response. If another agency takes over command in an ICS situation, the ER Lead and water system personnel remain in charge of all water system repairs and operations and coordinate with EOC

2.3 Communication

Communication during an incident is critical to relay information to employees, response partners and critical customers about potential risks to health, infrastructure, and the environment.

2.3.1 Internal Communication

List all utility emergency response team members, their response role, title and contact information.

Utilities Emergency Response/Damage Assessment Team Contact List

Name	Role/Title	Cell Phone	Alternate Phone	Email
Jason Barnes	ER Lead, Interim, Utilities Director	Cell (229) 251-1794	(229) 259-3592	jbarnes@valdostacity.com
Jason Barnes	Alternate ER Lead Asst. Utilities Director	Cell (229) 251-1794	(229) 259-3592	jbarnes@valdostacity.com
Philip Walker	WTP Operations, Supt. WTP	Cell (229) 263-1093	(229) 333-1881	pwalker@valdostacity.com
Charles Browning	WTP Operations, Asst. Supt. WTP	Cell: (229) 375-9531	(229) 333-1881	cbrowning@valdostacity.com
Kenneth Lowe	Mud Creek WPCP Operations/Supt.	(229) 977-6061	(229) 333-1855	klowe@valdostacity.com
Max Ahner	Mud Creek WPCP Operations/Asst. Supt.	(229) 561-3512	(229) 333-1855	mahner@valdostacity.com
Ricky Cornelius	Withlacoochee WPCP Operations/Supt.	(229) 292-0842	(229) 333-1857	wcornelius@valdostacity.com
Joseph Duval	Withlacoochee WPCP Operations/Asst. Supt.	(229) 232-9332	(229) 333-1857	jduval@valdostacity.com
Sheldon Irvin	Distribution/Collections System, Supt. Central Lines	(229) 460-6201	(229) 259-3592	sirvin@valdostacity.com
Leo Warner	Distribution/Collections System, Asst. Supt. Central Lines	(229) 251-0251	(229) 259-3592	lwarner@valdostacity.com
Randy Jones	WTP/WPCP Maintenance, CMMS Supt.	(229) 251-0761	(229) 259-3592	rjones@valdostacity.com
Joseph Gangler	Spills/Contamination Environmental Mgr.	(229) 251-6528	(229) 259-3592	jgangler@valdostacity.com
John Piper	Wastewater System/ Water Distribution locations/mapping GIS Coordinator	(229) 251-2239	(229) 259-3592	jpiper@valdostacity.com

Utilities Emergency Response/Damage Assessment Team Contact List

Name	Role/Title	Cell Phone	Alternate Phone	Email
Shuntel Ward	Utilities Operations/ Admin. Coordinator	(229) 561-2140	(229) 259-3592	sward@valdostacity.com
Deonna James	Supplies/Equipment Central Warehouse	(229) 563-1219	(229) 259-3593	djames@valdostacity.com

Engineering Department Contact List

Name	Role/Title	Cell Phone	Phone	Email
Ben O'Dowd	City Engineer	(229) 834-6278	(229) 259-3541	bodowd@valdostacity.com

Public Works Contact List

Name	Role/Title	Cell Phone	Phone	Email
Anthony Musgrove	Public Works Administrator	(229) 460-0914	(229) 259-3585	amusgrove@valdostacity.com

Public Information Office Contact List

Name	Role/Title	Cell Phone	Phone	Email
Sharah Denton	Public Information Officer	(229) 251-4779	(229) 259-3548	sdenton@valdostacity.com

Valdosta Police/Fire Department Contact List

Name	Role/Title	Cell Phone	Phone	Email
Leslie Manahan	Valdosta Police Chief	(229) 460-2425	(229) 242-2606	lmanahan@valdostacity.com
Brian Boutwell	Valdosta Fire Chief	(229)563-1518	(229) 333-1835	bboutwell@valdostacity.com

City Administration Office Contact List

Name	Role/Title	Cell Phone	Phone	Email
Richard Hardy,	City Manager	(229) 630-2074	(229) 259-3548	rhardy@valdostacity.com
Catherine Ammons	Asst. City Mgr.	(229) 588-1371	(229) 259-3544	cammons@valdostacity.com

2.3.2 External Response Partner Communication

External Response Partner Contact List

Organization or Department	Point Person Name or Position	Phone	Alternate Phone	Email or Website
Local Partners				
County Emergency Management/EOC	Ashley Tye	(229) 563-3329	(229) 671-2790	ashley.tye@lowndescounty.com
911 Non-emergency		(229) 245-5270		
Georgia Power	Anthony Lapoma	706-905-8802	770-603-5352	outagemap.georgiapower.com
Colquitt EMC	Keith Luke	(229) 392-5249	(229) 244-6893	colquittemc.com/outage-map/
Lowndes County Utilities	Steve Stalvey	(229) 671-2500		
Lowndes County Health Department	Kim Davis	(229) 333-5257		
EMC, Inc (SCADA)	James Denton	800-362-0545	(205) 661-3998	
GA 811		800-282-7411		
Southern Answering Service		(229) 424-4132		After hours answering service
VC3-IT Vendor		800-422-5941		
State and Federal Partners				
EPD Emergency Response Number		800-241-4113		
EPD Southwest District	Lisa T. Mylar, District Manager	(229) 430-4144		
EPA Regional Office	Region 4	800-214-1754	(404) 562-9900	
FBI field office Region 9	Jamy Steinburg, Agent in charge	(229) 225-4090		
CDC		800-232-4636		
National Response Number		800-424-8802		Chemical/Hazardous material spill

2.3.3 Critical Customer Communication

Critical Customer Contact List

Organization or Department	Phone	Email
South Georgia Medical Center 2501 North Patterson Street, Valdosta, GA 31602.	(229) 433-1000	https://www.sgmc.org
City of Remerton, Water/Sewer customer	(229)-247-2320	scowart@cityofremerton.com

2.3.4 Communication Equipment Inventory

Communication Equipment

Type	Assigned to	Location	Number/Frequency/Channel
Cell Phones	Employee	Utilities Department	
Two-way radios	Hand-held and vehicle	Utilities Department Administration Office	
Walkie Talkie	Water Treatment Plant	Water Treatment Plant	

2.4 Public Notifications

Any public notifications concerning WPCP shutdowns and/or wastewater spills/contamination due to emergency will be reported through City's Public Information Office.

2.5 Media Outreach

Contact List

Organization or Department	Point Person Name & Position	Phone	Alternate phone	Email or Website
City of Valdosta	Sharah Denton Public Information Officer	(229) 251-4779	(229) 259-3548	sdenton@valdostacity.com
Valdosta Daily Times (Local paper)	Dean Poling	(229) 244-4400		Dean.Poling@gaflnews.com
Black Crow Media (Radio station)	Jay Matthews	229-333-9543		jmathews@blackcrow.fm
Talk 92.1 (Radio station)	Scott James	229-561-7547		Scottjames29@hotmail.com
WALB-TV (TV station)	Area Reporter	229-446-1010		walb-news@gray.tv
WCTV-TV (TV station)	Area Reporter	850-893-6666		News@wctv.tv

3.0 EMERGENCY PLANS AND PROCEDURES

This section contains plans and procedures that can be implemented in the event of a malevolent act or natural hazard that threatens your utility's ability to deliver safe drinking water.

3.1 Core Response Procedures

Core procedures are the "building blocks" for incident specific response procedures, as they are typically implemented across a broad variety of incidents (e.g., hurricane, earthquake, flood). List all your core procedures here.

WPCP Access

Item	Description
Debris clearing	Utilities Department Central Lines Division has available backhoe tractors and dump trucks. Public Works Department has debris clearing equipment and would be contacted if needed. (Listed in external contact list)
Alternate routes to WTP	Main route: Wetherington Lane off of Highway 84
Identification badges	All WPCP staff and employees of Utilities Department have a photo ID badge.
Plant entry gate	Access into WPCP is controlled by entry gate. Gate is unlocked and opened at 7:00 am. Closed and locked at 5:00 pm

WWTP Physical Security

Item	Description
Access control procedures	The WPCP has fencing at 72"and include rolled barbed wire headers. Gates are kept operational and locked with single locks only with only authorized system employees having keys. Access into WPCP is controlled by entry gate. WPCP have security lights. Law enforcement notified of any suspicious activity. Operations Building front door locked.
Restricted areas	The WPCP, and right of way to outfall are considered restricted areas. Only authorized employees of the Utilities Department may enter restricted areas unaccompanied. All other people are required to be accompanied by an authorized employee of the WPCP at all times while in restricted areas. All restricted areas shall be visibly marked "Restricted Area / Authorized Personnel Only" and shall be kept locked and secure at all times when an employee is not onsite. Other security measures shall also be followed to prevent the unauthorized use, theft, or damage to water system property.
Evidence protection measures	If criminal activity is suspected, secure the site, and protect any evidence. Contact local and state authorities.

WPCP Cybersecurity	
Item	**Description**
Disconnect procedure	The single thing that employees can do as far as SCADA/OT at the plant level is concerned is go “Zero Tunnel”. To go “Zero Tunnel” you would simply need to unplug the city network from the back of your CISCO ISR4321 Router at the Admin building, and at the WWTP. This would accomplish isolation or, if the threat is local, containment.
Assess procedure	Assess any damage to utility systems and equipment, along with disruptions to utility operations.
Implementation processes	Execute the utility ERP as needed, including notification of utility personnel, actions to restore operations of mission critical processes (e.g., switch to manual operation if necessary), and public notification (if required)
Documentation	Document key information on the incident, including any suspicious calls, emails, or messages before or during the incident, damage to utility systems, and steps taken in response to the incident (including dates and times).
Operational Security	• Strong password policy - require passphrases (See SCADA Password Policy) • Delete/disable accounts of employees no longer with the company • Maintain updated computer software and protection agreements
Physical Security	Access to WPCP Operations Building secure by locked front door. Entry into WPCP is through entry gate. Gate is locked after 5:00 pm. Server room at WPCP locked. Server room located at Utilities Building locked.

WPCP Power Loss	
Item	**Description**
Backup power systems	WPCP has diesel generator, (1750 kW each), generator will provide electrical power for most treatment plant. Trailer mounted generator provides power to Headworks area.
Power Utility- Colquitt EMC	With a loss of power to WPCP, Colquitt EMC representative contacted for information concerning power outage, length of power outage, coordination in restoration of power.
Fuel plan	Diesel Storage: one (1) 2000 gal. tanks. Two and half days (2.5) days operation with full storage tank.
Maintenance plan	Generators exercised on a weekly plan. Diesel fuel treated as needed.
Other	

Emergency Alternate Drinking Water Supplies*	
Item	**Description**
Bottled water	Provider name: Nestle Waters Phone: (850) 971-2763 1306 NE Ivy Dr, Lee, FL 32059

Sampling and Analysis

Regulatory and WPCP process lab analysis performed by Environmental Wastewater Laboratory managed by Environmental Manager.

Outside analysis performed by private labs. (See below)

Local Contract/State/Federal Laboratory Contact List

Name	Address	Analytes/Methods	Phone	Email or Website
Environmental Testing Lab (ETL)	412 W. Walcott Thomasville, Ga. 31792	Bacteriological Metals, VOCs, SVOCs, TOC's	*(229) 228-2592*	bwilliams@etl-inc.com makers@etl-inc.com
Pace Analytical Services, Inc. (GA Lab # 812)	Atlanta 110 Technology Pkwy Norcross, GA 30092	Bacteriological Metals, VOCs, SVOCs, TOC's,	Contact: Pam Varner 770-734-4200	

3.2 Incident-Specific Response Procedures

Below are Incident-Specific Response Procedures (ISRPs), specialized procedures tailored to an incident type.

Emergency Event:	**WW-1: SEWER MAIN BLOCKAGE**
Emergency Trigger:	• Loss of flow to WPCP • Visible evidence of leaking wastewater/spill • Public complaint
Risks:	• Environmental / Property Damage • Possible Sanitary Sewer Overflow/Spill • Potential contamination

Actions Required: • Investigate extent and cause of blockage • Isolate blockage • Contain wastewater discharge. (Vacuum Truck). If necessary, use by-pass pumping (Refer to SOP Procedures for SSO's) • Make necessary repairs utilizing approved methods and procedures (Refer to SOP Procedures for SSO's) • If blockage results in sewage overflow/spill, follow procedures in SOP: Emergency Response to Sanitary Sewer Overflow/Spill
Internal Contacts: • Utilities Director (ER Lead) • Asst. Utilities Director (Alternate ER Lead) • Environmental Manager • City Engineer • City Manager/Asst. City Manager • Central Warehouse
External Contacts: Environmental Protection Division (EPD) Affected Customers
Follow Up Actions Required: • Update maintenance records with details of the sewer blockage • Written report • Written report to EPD, if required

Emergency Event:	**WW-2 SEWER FORCE MAIN BREAK**
Emergency Trigger:	• Loss of system pressure • Loss of flow to WPCP • Visible evidence of leaking wastewater (Overflow/spill) • Public complaint
Risks:	• Loss of system pressure • Loss of flow to WPCP • Possible Sanitary Sewer Overflow (SSO)/Spill • Contamination / Health • Environmental / Property Damage

Actions Required:
• Investigate extent and cause of failure
• Isolate main break
• Contain wastewater discharge. (Vacuum truck) If necessary, implement by-pass pumping, if necessary
• Make necessary repairs utilizing approved methods and procedures
• If main break results in sewage overflow/spill, see SOP: Emergency Response to Sanitary Sewer Overflow/Spill

Internal Contacts:
• Utilities Director (ER Lead)
• Asst. Utilities Director (Alternate ER Lead)
• Environmental Manager
• City Engineer
• City Manager/Asst. City Manager
• Public Information Officer
• Central Warehouse

External Contacts:
EPD
Affected Customers

Follow Up Actions Required:
• Update maintenance records with details of the sewer main break.
• Written report.
• Written report to EPD, if necessary.

Emergency Event:	**WW-3 WASTEWATER PUMP STATION FAILURE**
Emergency Trigger:	• SCADA Alarm • Power Outage • Loss of flow to WPCP • Visible evidence of leaking wastewater • Public complaint
Risks:	• Loss of flow to WPCP • Possible Sanitary Sewer Overflow (SSO)/Spill • Contamination / Health • Environmental / Property Damage

Actions Required:
• Investigate extent and cause of failure
• Make necessary repairs utilizing approved methods and procedures
• If necessary, implement temporary bypassing.
• If failure results in sewage overflow/spill, see procedures in SOP: Emergency Response to Sanitary Sewer Overflow/Spill

Internal Contacts:
• Utilities Director (ER Lead)
• Asst. Utilities Director (Alternate ER Lead)
• ER/Assessment Team
• Fire Department
• City Engineer
• Public Information Officer
• Central Warehouse
• City Manager/Asst. City Manager

External Contacts:
EPD
Affected Customers

Follow Up Actions Required:
• Update maintenance records with details of the actions.
• Written report.
• Written report to EPD, if necessary.

Emergency Event:	**WW-4 WASTEWATER CONTAMINATION**
Emergency Trigger:	• Any system component failure that gives suspicion of possible raw wastewater contamination. • Vandalism or unauthorized access into lift station or treatment plant • Main break where surrounding substances may have entered into the wastewater system • Notification that contamination may have occurred, (i.e., industry spill, illegal dumping into system.)
Risks:	• Contamination / Health • National Pollutant Discharge Elimination System (NPDES) permit violation

Actions Required:
• Investigate contamination source and attempt to mitigate. If contamination is an act of sabotage, take appropriate action based on nature of contamination. Immediately contact local law enforcement and EPD.
• If location of Suspected Contaminated Wastewater is within the City Collection system:
  - Notify treatment plant of contamination and the location.
  - Use vacuum truck to collect as much of contamination as possible and dispose of according to approved methods. (See SOP: Emergency Response to Sanitary Sewer Overflows/Spills)
  - Notify Environmental Manager
• If location of Suspected Contaminated Wastewater is within treatment plant:
  - If detected coming in plant influent pump station, divert as much of contamination to empty basin if possible. Release into plant as flow allows.
  - Notify Environmental Manager

Discretionary Actions:
• Actions as per City's Industrial Pre-treatment Plan

Internal Contacts:
• Utilities Director (ER Lead)
• Asst. Utilities Director (Alternate ER Lead)
• Environmental Manager
• Fire Department (Hazmat Team)
• City Manager/Asst. City Manager

External Contacts:
• EPD
• Health Department

Follow Up Actions Required:
• Written report
• Written report to EPD

Emergency Event:	**WW-5 VANDALISM OF WASTEWATER SYSTEM**
Emergency Trigger:	• Any vandalism to any component of the wastewater system: WPCP, Lift Station, or manhole/sewer pipe.
Risks:	• Operation • Contamination

Actions Required:
• If criminal activity is suspected, contact City Police Department
• Determine if contamination may have occurred in wastewater system
• If potential contamination, follow Suspected Contaminated Wastewater Procedures
• Make necessary repairs where needed utilizing approved methods and procedures

Discretionary Actions: Contact GBI/FBI if terrorist activity is suspected

Internal Contacts:
• Utilities Director (ER Lead)
• Asst. Utilities Director (Alternate ER Lead)
• City Manager/Asst. City Manager
• Police Department
• Fire Department
• Public Information Officer (Media)

External Contacts:
• EPD

Follow Up Actions Required:
• Detailed Written report (internal to City)
• Written report to external agencies (EPD), if required

Emergency Event:	**WW-6 HAZARDOUS WASTE SPILL**
Emergency Trigger:	• Any waste spill in the vicinity of any portion of the wastewater system
Risks:	• Contamination / Health

Actions Required:
• Immediately notify WPCP
• Follow SOP Response to Overflows/Spills:
(Hazardous Chemical Spill/Coordination with Hazardous Materials Response)
• Determine if spill may have contaminated wastewater system
• If potential contamination, follow Suspected Contamination Wastewater System Procedures
• Call National Chemical Response number

Discretionary Actions:
• Contact affected users

Internal Contacts:
• Utilities Director (ER Lead)
• Asst. Utilities Director (Alternate ER Lead)
• Environmental Manager
• City Manager/Asst. City Manager
• City Public Information Officer
• Fire Department Hazmat Team

External Contacts:
• EPD
• Health Department
• National Chemical Response

Follow Up Actions Required:
• Detailed Written report (internal to City)
• Written report to external agencies (EPD), if required

Emergency Event:	**WW-7 NPDES PERMIT VIOLATION**
Emergency Trigger:	• Water quality tests exceed limits for chemical, physical, or bacteriological parameters
Risks:	• Contamination / Health

Actions Required:
• Follow State EPD guidelines in required assessments and reporting.

Discretionary Actions:
• Re-sample wastewater to ensure accurate results

Internal Contacts:
• Utilities Director (ER Lead)
• Asst. Utilities Director (Alternate ER Lead)
• Environmental Manager

External Contacts:
• EPD
• Health Department

Follow Up Actions Required:
• Written report (internal to City)
• Written report to external agencies (EPD)

Emergency Event:	**WW-8 TREATMENT PLANT POWER FAILURE**
Emergency Trigger:	• Alarms via SCADA system • Notification from Georgia Power or Colquitt EMC
Risks:	• Plant Operations • Spill/Contamination • NPDES violation

Actions Required: • Assess situation and determine magnitude of interruption • Contact Georgia Power to determine magnitude of failure • In the event of extended power failure (as indicated by Ga. Power), prepare to run diesel generator(s) for back-up power supply. • If failure results in sewage overflow/spill, follow procedures in SOP: Emergency Response to Sanitary Sewer Overflow/Spill
Internal Contacts: • Utilities Director (ER Lead) • Asst. Utilities Director (Alternate ER Lead) • Environmental Manager • City Manager/Asst. City Manager • Public Information Officer • Fire Department • Police Department
External Contacts: • EPD • Health Department
Follow Up Actions Required: • Detailed Written report (internal to City) • Written report to external agencies (EPD), if required

Emergency Event:	**WW-9 TREATMENT PLANT EQUIPMENT FAILURE**
Emergency Trigger:	• Electrical loss or malfunction alarms via SCADA system • Equipment failure alarms via SCADA system
Risks:	• Operations • Spill/Contamination • NPDES Permit violation

Actions Required: • Conduct impact assessment • Investigate failure, determine cause, and appropriate repairs required • Arrange for necessary repair works • If failure results in sewage overflow or spill, Follow SOP: Emergency Response to Sanitary Sewer Overflow/Spill
Discretionary Actions: • Secure other back-up equipment (Bypass pumps)
Internal Contacts: • Utilities Director (ER Lead) • Asst. Utilities Director (Alternate ER Lead) • Environmental Manager • City Manager/Asst. City Manager • Public Information Officer
External Contacts: • EPD • Health Department
Follow Up Actions Required: • Detailed Written report (internal to City) • Written report to external agencies (EPD), if required

Emergency Event:	**WW-10 SCADA SYSTEM FAILURE**
Emergency Trigger:	• Alarm indicating loss of SCADA communications
Risks:	• Operations • Sewage Overflow/Spill/contamination • NPDES Permit violation

Actions Required: • Determine nature of failure (i.e.: communication or power failure), if power failure, follow procedures in plant power failure. • Determine magnitude of failure, specifically if the influent wastewater pumps have been affected • Implement schedule of manually checking operations at treatment plant, and pump stations on timelier schedule. • Contact SCADA contractor • Conduct necessary repairs
Internal Contacts: • Utilities Director (ER Lead) • Asst. Utilities Director (Alternate ER Lead) • Environmental Manager • City Manager/Asst. City Manager • City Public Information Officer
External Contacts: • EMC, Inc. (SCADA Contractor) • Ga. Power • EPD • Health Department
Follow Up Actions Required: • Detailed Written report (internal to City) • Written report to external agencies (EPD), if required

3.2.1 Natural Disasters

Severe Thunderstorms
Hurricanes (Tropical Storms)
Tornados
Floods

For procedures to follow with disasters listed above, refer to the following plans/procedures:

UTILITIES DEPARTMENT NATURAL DISASTER PREPARDNESS PLAN
UTILITIES WET WEATHER OPERATING PROCEDURES

3.2.2 Pandemics

Refer to: UTILITIES DEPARTMENT COVID 19 PREPARDNESS PLAN

4.0 MITIGATION ACTIONS

This section contains actions, procedures, and equipment which can obviate or significantly lessen the impact of a malevolent act or natural hazard on the public health and the safety and supply of drinking water provided to your community and individuals, including the development of alternative source water options, relocation of water intakes, and construction of flood protection barriers.

4.1 Power Outages

Backup Power Source

Treatment Plant

Power to plant supplied Colquitt EMC. If loss of main power back-up generator comes on, see below.

Treatment Plant has Diesel Backup Generator with Automatic Transfer Switch (ATS).

Notification of power loss by alarm, Diesel generator is called to come on and through ATS power to plant is transferred to generator.

Lift Stations

Most system lift stations have backup diesel generators with ATS, those that don't have adaptors for portable generators or bypass pumps.

4.2 Physical Security

The WPCP has fencing at 72"and include rolled barbed wire headers. Gates are kept operational and locked with single locks only with only authorized system employees having keys. Access into WPCP is controlled by card-operated electronic entry gate. WPCP have security lights. Law enforcement notified of any suspicious activity. Operations Building front door locked. Guests must report to Operations building.
The WPCP, and right of way to outfall are considered restricted areas. Only authorized employees of the Utilities Department may enter restricted areas unaccompanied. All other people are required to be accompanied by an authorized employee of the WPCP at all times while in restricted areas. All restricted areas shall be visibly marked "Restricted Area / Authorized Personnel Only" and shall be kept locked and secure at all times when an employee is not onsite. Other security measures shall also be followed to prevent the unauthorized use, theft, or damage to water system property.

4.3 Cyber-Security

- Strong password policy - require passphrases (See SCADA Password Policy)
- Delete/disable accounts of employees no longer with the company
- Maintain updated computer software and protection agreements

5.0 DETECTION STRATEGIES

This section contains strategies that can be used to aid in the detection of malevolent acts or natural hazards that threaten the security or resilience of the system.

Detection Strategies

Threat	Detection Method	Procedure
Unauthorized entry	• Access into WPCP is controlled by locked entry gate. • 24/7 operation.	Call 911.
Wastewater contamination	• Detection through analysis • Customer notification • Public • Operator	Wastewater Contamination Incident Response Procedure
Cyber intrusion	• Automated IT and operation technology (OT) system intrusion detection monitoring • Notification from utility staff	Cyber Incident Action Checklist
Hazardous chemical release	• National Response Center notifications • Plant staff surveillance	Call fire department hazmat
Hurricane	• Weather Service alerts • Emergency Alerts from County EMA	Refer to Utilities Department Natural Disaster Preparedness Plan
Flood	• Weather Service alerts • Emergency Alerts from County EMA	Refer to Utilities Department Natural Disaster Preparedness Plan
Power outage	• Notification from energy provider • Alarm from line power sensor	Incident-Specific Response Procedures (ISRPs): Water System Power Failure
Tornado	• Weather Service alerts Emergency Alerts from County EMA	Refer to Utilities Department Natural Disaster Preparedness Plan
Other: Pandemic	• Notification from WHO/CDC	Refer to UTILITIES DEPARTMENT COVID 19 PREPARDNESS PLAN