



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF WATER  
WSG #218  
Date Signed: August 2023

**MEMORANDUM**

**SUBJECT:** America's Water Infrastructure Act (AWIA) Section 2013 – Community Water System Risk and Resilience Assessments and Emergency Response Plans

**FROM:** Brian Pickard, Acting Deputy Division Director  
U.S. EPA Water Infrastructure and Cyber Resilience Division

**TO:** All Interested Parties

The purpose of this memorandum is to provide an overview of America's Water Infrastructure Act (AWIA) Section 2013 and direct interested parties to EPA's AWIA Section 2013 webpage for further resources on the topic.

On October 23, 2018, AWIA was signed into law. AWIA Section 2013 requires community (drinking) water systems (CWSs) serving more than 3,300 people to develop or update risk and resilience assessments (RRAs) and emergency response plans (ERPs). The law specifies the components that the RRAs and ERPs must address and establishes deadlines by which water systems must certify to EPA completion of the RRA and ERP. Furthermore, each CWS serving more than 3,300 people must review and, if necessary, revise its RRA and ERP at least once every five years. Upon completion of such a review, the system must certify that the review has been conducted and that the RRA and ERP have been revised, if applicable.

The attached fact sheet provides a brief overview of AWIA Section 2013 requirements, including what components CWS RRAs and ERPs must include, deadlines by which CWSs must certify their RRAs and ERPs to EPA, tools or methods that may be used to assist CWSs in developing their RRAs and ERPs, and several frequently asked questions. The last page of the fact sheet lists various sections of EPA's AWIA Section 2013 webpage, <https://www.epa.gov/waterresilience/awia-section-2013>, where interested individuals can go for additional information.

Please direct any questions regarding this document to the U.S. EPA Water Infrastructure and Cyber Resilience Division (WICRD) at [dwresilience@epa.gov](mailto:dwresilience@epa.gov).

Attachment

## Risk and Resilience Assessment and Emergency Response Plan Requirements for Drinking Water Utilities

Section 2013 of America's Water Infrastructure Act of 2018 (AWIA) requires community water systems (CWSs)<sup>1</sup> that serve more than 3,300 people to complete a risk and resilience assessment (RRA) and develop an emergency response plan (ERP). For more information, see [www.congress.gov/bill/115th-congress/senate-bill](https://www.congress.gov/bill/115th-congress/senate-bill).

### Risk and Resilience Assessment (RRA)

RRAs evaluate the vulnerabilities, threats, and consequences from potential hazards. AWIA RRAs shall assess the risks to and resilience of specified assets to malevolent acts and natural hazards, including:

- physical barriers
- source water
- pipes and constructed conveyances, water collection and intake
- pretreatment and treatment
- storage and distribution facilities
- electronic, computer, or other automated systems (including the security of such systems)
- monitoring practices
- financial infrastructure
- the use, storage, or handling of chemicals
- operation and maintenance of the system

CWSs that serve over 3,300 people must conduct an RRA and submit certification of its completion to the U.S. Environmental Protection Agency (EPA) by the dates specified in the law. Every five years, the utilities must review the RRA and submit a recertification to the EPA that the assessment has been reviewed and, if necessary, revised. The table below shows the original certification deadlines specified in the law, as well as the next 5-year cycle certification deadlines.

Population Served	Previous RRA Deadline	Next 5-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

Find more guidance for developing an RRA at <https://www.epa.gov/waterresilience/awia-section-2013#RRA>.

### Emergency Response Plan (ERP)

No later than six months after certifying completion of its RRA, each CWS must prepare or revise an ERP that incorporates the findings of the assessment. AWIA ERPs shall include:

- Strategies and resources to improve resilience, including physical security and cybersecurity.

<sup>1</sup> Section 2013 of AWIA applies to CWSs. CWSs are drinking water utilities that consistently serve at least 25 people or 15 service connections year-round.

- Plans and procedures for responding to a natural hazard or malevolent act that threatens safe drinking water.
- Actions and equipment to lessen the impact of a malevolent act or natural hazard, including alternative water sources, relocating intakes and flood protection barriers.
- Strategies to detect malevolent acts or natural hazards that threaten the system.

Utilities must develop or update an ERP and certify completion to EPA no later than six months after RRA certification. Each utility deadline is unique; however, the dates below are the due dates for utilities who submit an RRA certification by the final due date according to the population served.

Population Served	Previous ERP Deadline	Next 5-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

Find guidance on developing an ERP at <https://www.epa.gov/waterresilience/awia-section-2013#ERP>.

## Tools or Methods

AWIA does not require the use of any standards, methods, or tools for the RRA or ERP. Your utility is responsible for ensuring that the RRA and ERP address all the criteria in AWIA Section 2013(a) and (b), respectively. EPA recommends the use of EPA tools to facilitate sound RRAs and ERPs. For the RRA, EPA has created the [Vulnerability Self-Assessment Tool Web 3.0](#), the [Baseline Information on Malevolent Acts for CWSs](#), and the [AWIA Small System Risk and Resilience Assessment Checklist](#). EPA created the [Emergency Response Plan Template and Guidance](#) to support compliance with the ERP requirements.

## Frequently Asked Questions

**How does a wholesale or consecutive CWS calculate its population served with respect to the AWIA section 2013 RRA and ERP requirements?**

When determining population served, wholesale or consecutive CWSs should account for (i.e., include) the population served of the community or communities to which they serve water. If you have any questions about whether your CWS must comply with AWIA due to its population served, please email EPA at [dwresilience@epa.gov](mailto:dwresilience@epa.gov).

**Who should I work with when creating my RRA and ERP?**

Utilities shall, to the extent possible, coordinate the RRAs and ERPs with [local emergency planning committees](#).

**Who can certify my RRA and ERP?**

RRAs and ERPs can be self-certified by the utility. The certifying official should be a utility employee. Beyond that, each utility should designate a certifying official.

**How do I submit my certification?**

Three options are available for submittal: regular mail, email, and an online portal (user-friendly and secure). The online submission portal will provide a receipt of submittal; EPA recommends using this method. Please visit [EPA's AWIA How to Certify webpage](#) for more information on how to certify.

**If I oversee multiple Public Water System Identification (PWSID) numbers, do I need to submit an RRA and ERP certification for each?**

Yes, EPA tracks RRA and ERP certifications by individual PWSID. Users of EPA's electronic certification system can register for, create, and use one User ID and password to certify RRAs and ERPs for multiple PWSIDs. If you submit via regular mail or email, please complete RRA and ERP certification forms for each individual PWSID.

**Do CWSs need to submit their RRA and ERP documents to EPA or do CWSs only need to submit the RRA and ERP certification forms?**

CWSs should not submit their RRA and ERP documents to EPA as part of the certification process.

**Do I need to submit my certification to my state or local government?**

No. Section 2013 of AWIA does not require utilities to submit the certification to state or local governments.

**How long do I need to keep a copy of my RRA and ERP?**

Utilities need to keep a copy of both documents for five years after certification.

## **Still have questions about AWIA RRA and ERP requirements?**

Contact EPA with AWIA-related questions at [dwresilience@epa.gov](mailto:dwresilience@epa.gov).

Please visit EPA's AWIA Section 2013 website, [www.epa.gov/waterresilience/awia-section-2013](http://www.epa.gov/waterresilience/awia-section-2013), for more in-depth information on the following topics:

- [Certification Deadlines](#)
- [RRA Requirements and Assistance Resources for CWSs that Serve More than 3,300](#)
- [ERP Requirements and Assistance Resources for CWSs that Serve More than 3,300](#)
- [Recursos de AWIA en Español](#)
- [Certification Process](#)
- [Compliance Data](#)
- [Third-Party Standards](#)
- [Resources to Promote RRAs and ERPs for CWSs that Serve Less than 3,301, non-CWSs, and Wastewater Systems](#)
- [Final Disposition of Bioterrorism Act Vulnerability Assessments](#)
- [Workshops](#)
- [Frequently Asked Questions](#)
- [Fact Sheet](#)
- [Resources for Technical Assistance Providers](#)
- [Five-year Review, Revision and Certification Requirements](#)