

Emergency Preparedness Plan Frequently Asked Questions (FAQ) Page

1. What is an EPP?

An EPP is an Emergency Preparedness Plan. The EPP consists of a packet of information that the water system submits to TCEQ for review. The plan contains information about the affected system and how it operates under emergency conditions. The plan will propose to TCEQ how the system will maintain a water pressure of 35 psi throughout the distribution system when the power has been off for more than 24 hours during an emergency and contains emergency phone numbers.

During Hurricane Ike in 2008, residents in the Houston area were without power and water. In 2009, as required by SB 361 (Senate Bill 361, 81st Legislature, 2009), the TCEQ amended the Texas Public Drinking Water Rules to include the EPP requirements for water systems with customers in Harris County. Further revisions were required by HB 805 ([House Bill 805, 82nd Legislature, 2011](#)). Water systems with customers in Harris County and Fort Bend County are now required to develop an Emergency Preparedness Plan (EPP) to restore water service following natural disasters. An EPP is a water system's plan to provide water during an extended power outage.

2. Why are Harris and Fort Bend Counties the only counties that this applies to?

Currently, the EPP requirements apply only to Harris County and Fort Bend County because Harris County has a population greater than 3.3 million and Fort Bend County is adjacent to Harris County and has a population greater than 550,000 according to the 2010 official census. Please see HB 805 ([House Bill 805, 82nd Legislature, 2011](#)) for more information.

3. I'm not a Public Water System (PWS), why am I affected?

Though you may not meet the definition of a Public Water System (PWS), if you provide water to 2 or more customers located in Fort Bend or Harris counties, you are considered an "affected utility" even if you do not meet the definition of a public water system.

4. Can I have help preparing the EPP?

Yes, help is available. You can call the EPP hotline at (512-239-3771) or send us an email at PDWEPP@tceq.texas.gov. TCEQ can also provide access to our Financial, Managerial, and Technical (FMT) assistance contractors to assist in achieving compliance.

If you operate a water or wastewater system and would like to arrange for financial, managerial, or technical assistance, contact our FMT program coordinator:

FMT Coordinator
Phone: 512-239-4691
E-mail: FMT@tceq.texas.gov

5. What are my options?

TCEQ has approved 8 options as defined in 30 TAC 290.45(h)(1)(A-H).

6. How do I apply for a waiver?

If implementing an EPP will cause a significant financial burden to your customers, you may apply for a waiver to the EPP requirement by completing and submitting a waiver.

7. When do I need to turn in my EPP?

New systems in Fort Bend County and Harris County must have an approved EPP **before** serving water to customers. Newly, discovered, existing water systems will need to submit an EPP within 90 days of being notified that they are an affected utility.

8. When do I need to begin implementing the EPP?

New systems in Fort Bend County and Harris County must implement their approved EPP **before** serving water to customers. Newly, discovered, existing water systems will need to implement their EPP within 90 days of their EPP approval letter date.

9. Can I apply for an extension to the implementation deadline?

Yes. Affected utilities which provide water to customers located in Fort Bend County or Harris County may request an extension to implement their plan, not to exceed 90 days from the date of your request. To request an extension, send a letter explaining why you need the extension to:

Drinking Water Special Functions Section, MC-155
Texas Commission on Environmental Quality
P.O. Box 13087
Austin TX 78711-3087

10. Where can I mail my EPP for approval?

Emergency Preparedness Plan submission may be mailed to the following address:

Drinking Water Special Functions Section, MC-155
Texas Commission on Environmental Quality
PO Box 13087
Austin TX 78711-3087

11. Who else is required to have a copy of your approved EPP?

An **affected utility** with an approved EPP is also required to provide a copy of the approved EPP to the local county judge or the office of emergency management of each county, the Texas Public Utility Commission (PUC), and the Texas Department of Emergency Management (TDEM) see [TWC Chapter 13 Section 13.1396 Coordination of Emergency Operations](#). Furthermore, an affected utility is also required to inform their electrical service provider(s), the PUC, and TDEM with information to determine if the affected utility meets the requirements of critical load status.

1) Public Utility Commission of Texas Filing Information:

Included below is the link for the Confidential filing procedures for the PUC and the Docket No. to be used is 37548.

<http://puc.texas.gov/industry/filings/Confidential.aspx>

Address:

Public Utility Commission of Texas
Central Records
1701 N Congress PO Box 13326
Austin, Texas 78711-3326

For additional questions contact the PUC Central Records office at 512-936-7180.

2) Texas Department of Emergency Management Filing Information:

Emergency Preparedness Plan (EPP) can be submitted to TDEM.PLANS@dps.texas.gov

Currently, TDEM is accepting approved EPPs via email as they transition from TXDPS over to the Texas A&M System.

12. I purchase my water and have no facilities of my own to provide pressure. What do I do?

Under Option 2, you can submit with your EPP your contract with your water provider. Be sure to highlight the provisions that show that the provider will supply water at 35 psi throughout your distribution system.

13. What if my current purchase water contract does not guarantee the pressure during an emergency?

- You can contact your water provider and have them supply you with either an amended contract or a letter that states they will supply water at 35 psi throughout your distribution system during an emergency.
- You can obtain a new water purchase contract with a different provider that will guarantee they will supply water at 35 psi throughout your distribution system during an emergency.
- If your water provider includes your system in its connection count on their approved EPP,

then TCEQ considers your system to be covered by the provider.

- You can drill a well.
- You can provide an engineering study (hydraulic analysis) sealed by a Texas Licensed Professional Engineer demonstrating that the water provider is providing your entire distribution system with water services at a minimum of 35 psi.
- You can install a storage tank and appropriate equipment to pressurize your system.
- If you do not think that any of these options are financially appropriate for your system, you may also request a financial waiver from the EPP requirement by completing and submitting the [waiver template](#). [Please see Waiver Fact Sheet](#)

14. What happens if my system is unable to maintain 35 psi as required during an extended power outage?

Following an extended power outage and in accordance with 30 TAC 290.46(r) an affected utility which is unable to maintain 35 psi during an extended power outage will be requested to provide an explain as to why the water system could not meet the pressure requirements in their distribution system at the time of the outage. Possible explanations: excessive flooding, damage to generator, damage to electrical components, damage to distribution lines, insufficient fuel, and or may require updating an outdated EPP.

15. How can I check the status of my review?

Because EPP information is confidential, detailed information is not available on-line. Please call 512-239-EPP1 (512-239-3771) or send an email PDWEPP@tceq.texas.gov for the status of your EPP.

16. What does EPP implementation completion mean?

The date you selected as the implementation completion date is very important. Implementation completion means the alternative power option proposed to TCEQ has gone into effect and is ready for use during an emergency. Implementation is complete when, for example, a generator has been purchased and quick connections have been installed at your water plant. The approved EPP must be completely implemented by the EPP implementation completion date.

17. When do I need to update my EPP?

- A new EPP is required when an affected utility installs new equipment (e.g. larger generator, new water plant, larger water plant equipment).
- An affected utility wants to choose a different option from the original EPP approved option.
- An affected utility wants to use their EPP in lieu of elevated storage capacity.
- A non-affected utility changes their status to an affected utility (e.g. a convenience store owner begins providing water to a mobile home park).

- A new EPP **is not** required for changes to utility contact information. For changes to utility contact information please submit only the applicable pages of the EPP template. Please include the updates in your copy of your EPP and submit the updated information to the other organizations listed on Attachment A.

18. My EPP contains sensitive information about my facility, how will it be protected?

Under [Texas Water Code, Section 13.1395\(l\)](#), information provided by an affected utility in its EPP is confidential and is not subject to disclosure. TCEQ will not share your information with anyone except the person listed as the contact for the system and the individual who prepared the EPP (if they are not the same). All documents are marked confidential and are kept in a secured location.