

**Source Water Protection Strategy Update
Preparedness Workgroup Meeting # 2
Meeting Minutes
March 11, 2019 9:00am**

Present:

Andrew Madison, NHDES
Pierce Rigrod, NHDES
Tyler Davidson, NHDES
Justin Kates, Nashua Emergency Management
Alex Marinaccio, NH HSEM
John Cannon, NH HSEM
Bob Bishop, NHDES
Cassie Mullen, Nashua Regional Planning Commission
Ian Rohrbacher, City of Rochester

- Introductions
- Review and Approve Minutes
 - Minutes were approved without any comment or edits
- Recap of workgroup purpose
- Findings and Actions
 - Review findings and actions developed during previous meeting
 - Endorse findings, which will be included in a report to the SW Strategy Update Advisory Committee
 - Implementation of actions is largely resource driven, but ideally actionable items to be implemented within the next 3-5 years.
- **Finding: Illicit Discharges – Action: Support Local MS4 Programs**
 - Can be difficult to track and can convey contaminants into DW sources.
 - Many cities have done a good job mapping stormwater infrastructure, however activation protocol remains an issue for some communities.
 - More awareness of mapping resources available to communities.
 - MS4 Permits already prioritize source protection areas, however NHDES could provide cities and towns with additional information on where to prioritize activities.
 - EPA stormwater tool kits can detect illicit discharges by starting at a discharge and working up stream. EPA has the capability to run them.
 - There is a need to prioritize where to start looking for illegal discharges, areas zoned for commercial or industrial uses but without sewer service would be a good starting point. The Wal-Mart in Raymond is a good example of this.
 - Using Tier II reports to identify areas storing large quantities of hazardous materials should also be a high priority for locating illegal discharges.
 - Issues regarding floor drains have largely been taken care of, however parking lots remain a problem.
- **Identifying and addressing illicit discharges should be considered a high priority.**

- **Finding: Awareness of Downstream Water Sources – Action: Distribute Spill Response Maps**
 - Responders may not be aware of sources near the site of an emergency, and may not take drinking water sensitivities into account when life safety issues or other priorities are present.
 - Distributing maps detailing water sources and flow paths to FD's and regional HazMat teams could help raise awareness.
 - Two incidents in Rochester highlighted the need for increased awareness:
 - A fire on an island within Rochester's water supply reservoir where Class B Foam was being considered for use in extinguishing.
 - A vehicle accident where a car went over a berm and landed near the reservoir shore. Local FD (Barrington) knew to inform Rochester Water Department, which highlights the need to build relationships with neighbors.
 - The workgroup felt there was obvious value in increasing awareness of water sources and water quality related issues with first responders.
 - For many FD's, they may not be aware of nearby water sources and the impact activities, such as the deployment of foam, may have might not be obvious.
 - It's common for NHDES's Spill Response team to arrive on scene after FD's have stabilized the scene, and usually have already left. Usually life and property safety issues take precedent over anticipated environmental issues such as impacts to drinking water supplies.
 - It may be prudent to have water suppliers notified of any type of accident or fire whenever it is near their source.
 - If it can be reasonable done, it may be helpful to have dispatch notify water suppliers whenever there is a call near their source. Calls into E911 are typically geo-located so this information could be provided to dispatchers, however not all calls go through E911.
 - Depending on the size of a system, it can be difficult to reach someone during off-hours, though all systems should have someone on-call.
 - There is a need to focus activities on what will accomplish the greatest good for the most people. This includes notifying operators of any E911 call within a source protection area, and notifying operators when a spill is confirmed or dismissed.
 - Facilities or responsible parties are required to notify the National Response Center (NRC) whenever a spill of any size goes into surface waters. However, NRC or E911 may not be the first call after a spill and not everyone is aware of NRC.
 - Updates to EPCRA designate the state primacy agency (NHDES) as the entity responsible for notifying PWS's of a spill or release.
 - Responders need tools they can utilize quickly and easily in the event of an emergency. EPA has a tool displaying direction of flow and downstream water supplies.
 - Education and outreach to FD's should be the priority, stressing the importance of public water supplies to fire suppression could be a "hook" to gain cooperation.

- **Increasing awareness of downstream drinking water supplies among emergency responders should be considered a high priority.**

- **Finding: Mobile Sources – Action: Identify and Address Sites where Mobile Spills are a Frequent Occurrence.**
 - Spills from mobile sources (tanker trucks, rail cars, barrels or other containers) on roadways near water sources can be problematic and nearly impossible to fully understand the risk they present.
 - A two-pronged approach may be useful in addressing mobile spills, including utilizing a playbook for responders and working with stakeholders (local hwy depts., NHDOT) to address spills.
 - Nashua has created a playbook for its responders, highlighting actions to take and resources available during a spill. Includes maps, contacts, and information on nearby water sources. The playbooks consolidate the resources responders will need for an effective response in one sheet.
 - Nashua’s playbooks could be used as a template for other communities, however a new set of playbooks for another community would likely cost approximately \$5,000 depending on the level of mapping that needs to be done.
 - NHDES’s Source Water Program could support playbooks for communities in priority areas. Additionally, RPC’s could assist communities with creating these resources.

- **Identifying and addressing mobile sources should be considered a medium priority.**

- **Finding: Inadequate Communications – Action: Training**
 - Exercises and real-world incidences have seen PWS’s not promptly notified of a spill or release. Despite TTX’s and FSE’s, communications between responders and PWS’s remain problematic.
 - NH HSEM can help with trainings, and help identify areas in the state where these trainings could be useful, however involving local responders/dispatchers/operators is critical.
 - It would be beneficial for responders to familiarize themselves with local water suppliers and build relationships with operators/managers/staff. Going on a tour of the local treatment plant could be a great way to accomplish this.
 - Nashua’s LEPC provides some training and has one training session related to drinking water supplies currently scheduled.
 - Different training approaches will be needed for full-time versus volunteer departments. Online training could assist with this.
 - Regularly scheduled conferences and workshops could provide another avenue for training.

- **Providing training to first responders on the subject of public water supplies should be considered a high priority.**

- **Finding: Under-Utilized Emergency Response Plans – Action: Sharing and Exercising Emergency Response Plans**

- Full-Scale Exercises and real-world incidents have demonstrated that emergency response plans, required to be kept on file by PWS's, are not always utilized during an emergency.
- Requiring local fire chiefs to review and sign off on emergency response plans could be a way to encourage water suppliers to share their plans with local FD's.
- A specific chapter of emergency response plans could be tailored to provide just the information FD's will need, this chapter or section could then be provided to chiefs for their approval. Nashua's playbooks have already accomplished this, and the playbook model could be useful for other communities.
- LEPC's have HazMat response plans which are updated annually and recently have started including source protection information.
- FD's don't need to know everything contained within an emergency response plan. Healthcare facilities have emergency plans which might serve as a good model as for what to provide to FD's.
- **Sharing and exercising emergency response plans is considered to be a low priority.**
- **Finding: Emergency Training for Water Operators – Action: Require or Encourage Training**
 - PWS operators should be required to take NIMS training so as to familiarize themselves with incident command and be able to participate effectively in the response to an emergency.
 - Most cities and towns should be NIMS compliant as this is required of NH HSEM in order to receive Emergency Management Performance Grants.
 - Emergency response training is important, but on-call operators are not likely to be making major decisions during an emergency. Training should be focused on primary operators or higher.
 - Operators are likely to benefit more from hands-on training experiences such as exercises.
- **Emergency response training for PWS operators is considered to be a low priority.**
- **Finding: Non-Petroleum AST's – Action: Request FD's Perform BMP Inspections as a Part of Regular Life Safety Inspections.**
 - Few, if any, non-petroleum AST's are inspected for compliance with BMP's.
 - Env-Wq-401 may not adequately address or regulate these tanks. Approximately 1/3 of the non-petroleum AST's in Pennichuck's Hydrologic Area of Concern have been inspected within the last three years.
 - Backflow inspections could potentially double as BMP inspections.
 - No authority currently exists for either NHDES or NH HSEM to require inspections of non-petroleum AST's.
 - Limited interest likely exists from FD's to add tasks, such as performing BMP's inspections, to already busy life-safety inspections.
 - Continuing on DES's current path of keeping water suppliers aware of the existence of facilities, and directing state and federal resources where applicable, is likely the best option.
- **FD's should not be requested to perform BMP inspections, and NHDES should continue with its current activities with regard to non-petroleum AST's.**

- **Finding: LEPC Coverage and Activity – Action: Support the Formation and Activities of LEPC’s.**
 - Not all NH communities participate in a Local Emergency Planning Committee (LEPC). Some LEPC have reduced their activities as staff have left or retired. NHDES should pursue getting communities in priority areas to participate in LEPC’s.
 - LEPC’s are required by EPCRA, however there’s no enforcement of that rule either from the state or EPA.
 - Only so much can be done to build an LEPC, however the most important thing is to get responders meeting and talking so they can self-organize an LEPC. Regional Emergency Planning Commissions typically promote and encourage the development of LEPC’s, however some smaller communities may not have the bandwidth or enough going on in their communities to warrant participating in an LEPC.
 - There is a need for more support for LEPC’s from the State Emergency Response Committee (SERC) and the Governor’s office.
 - Aligning LEPC’s with regional HazMat teams could be useful, the SERC should be able to ID planning districts. However, it may be useful, for now, if communities and local FD’s got together to form LEPC’s until the SERC is more active.
 - It was agreed that it is very important to work on making the development of an LEPC a feasible action for communities, and that some capacity building may be necessary for new, or reactivated LEPC’s. Communities will need a work plan and a schedule of discussion topics to maintain interest in regular LEPC meetings. Each LEPC meeting should serve a purpose and be focused on an end product, a TTX could be a starting point for reactivating Manchester’s LEPC. Nashua has had some success with this and Manchester could be a good starting point for expanding LEPC’s into new communities.
- **The formation or reactivation of LEPC’s around the state is a high priority, especially in areas where surface water intakes exist near industrial facilities, such as Manchester.**
- **Finding: Availability of EPCRA Tier II Data – Action: Updates to Regulations**
 - American Water Infrastructure Act (AWIA) grants PWS’s access to Tier II data upon request. PWS’s will have to contact NH HSEM to get the data, although local FD’s should have the data, PWS’s shouldn’t rely on them to be able to provide it.
 - A digital repository for this data should be created by either NHDES or NH HSEM as much of this data cannot be made publically available due to trade secrets.
 - The data will need to be available in a user-friendly format. Right now the data is only available in CAMEO, which requires user training and specialized software. Nashua’s LEPC provides PDF reports to each of its member towns. Similar reports could be put into the password protected version of one-stop.

- LEPC's could require separate Tier II reports for each AST, as facilities are currently required to submit one GPS point for their facility. The 2016 study found these were frequently inaccurate, especially for large facilities with multiple AST's.
- **Recent updates to EPCRA regulations via AWIA grant PWS's access to Tier II data, therefore this is a low priority and requires only follow-up with HSEM regarding how data is provided to PWS's.**
- **Finding: Inadequate Local AST Regulations – Action: Updated Model Ordinance**
 - Limited local regulation regarding the placement of large AST's/HazMat storage.
 - Model ordinance language would be useful; interest currently exists among planning boards around the state. NRPC is currently working on a model ordinance and site plan regulations.
 - Existing development and infrastructure can limit flexibility in facility designs.
 - There is limited ability to regulate rail-cars, which are often used as temporary AST's by some facilities to avoid regulations.
- **The development of a model ordinance for the local regulation of the storage of hazardous materials is considered a high priority.**
- **Finding: Time of Travel Studies Not Fully Utilized/Not Available for All Waterbodies – Actions: Encourage Time of Travel Studies for all NH Drinking Water Surface Sources, and Make Time of Travel Studies Easier for Operators to Utilize During an Emergency.**
 - Time of Travel (ToT) exist for several NH surface sources, however PWS's are not using them during emergencies or exercises. The studies need to be easy for operators to use during an emergency, an online tool could potentially accomplish this. New Hampshire Water Works Association could be a potential partner.
 - There is also potential to coordinate ToT studies with the in-stream flow program.
 - ToT Studies were considered as a tool for Nashua's Playbooks, however were left out due to their difficulty to use. ToT Studies could be useful if they were made into a more user-friendly format. USGS may be interested in developing a tool to make ToT studies easier to use.
- **NHDES should work with operators and responders to develop a conceptual model of a tool for USGS to develop, then encourage PWS's to adopt and utilize the tool. This is a medium priority.**
- **Finding: Organics Detection System – Action: Require new River Sources to Install.**
 - Organics Detection Systems, similar to what is installed in the Ohio River Basin, could be useful for some NH Rivers such as the Merrimack.
 - Detection systems could be expensive to operate, but useful, especially for downstream water sources who may be willing to share costs.

- **NHDES should continue to investigate the feasibility of an ODS system, this is a low priority however.**
- **Recap Priorities**
- **NHDES to prepare draft report, including findings and actions, for the workgroup to approve and endorse.**
- **Potentially one more meeting, but draft report to be prepared via google docs.**
- **Meeting adjourned 11:45am.**