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Michael C. Patrick
Executive Director

June 13, 2025

EES Case Management Unit
Environment and Natural Resources Division
U.S. Department of Justice
Box 7611
Washington, D.C. 20044-7611

Re: DJ # 90-5-1-1-11394 – Incident Response Plan (IRP) Deliverable Draft Submitted for review by EPA and TDEC.

EES Case Management Unit:

The Hamilton County WWTA has completed a draft deliverable in accordance with the Consent Decree entered into by the United States District Court for the Eastern District of Tennessee (Southern Division), titled *Incident Response Plan.*

Pursuant to the Consent Decree, the *Incident Response Plan (IRP)* provides adequate guidelines to improve the reliability of operations at WWTA facilities and ensure they are operating properly to convey flows throughout the system.

The goals of this Incident Response Plan include the following:

- Provide Standard Operating Procedures during routine and catastrophic incident responses.
- Reduce the impact of incidents through WWTA staff preparation and response effectiveness.
- Provide criteria for notifying the public and regulatory authorities.
- Reduce adverse effects to public health and the environment.

The deliverable has been submitted for public comment to the Public Document Repository (PDR) located on the WWTA's website here: https://wwta.hamiltontn.gov/178/Public-Document-Repository and also as a physical hard copy in a Public Document Repository at the Chattanooga-Hamilton County Library as of **June 13, 2025**. Public comments must be submitted within 45 days of the date entered in the PDR. The public may use the form available in the PDR to provide comments or send comments directly to:

Hamilton County Water and Wastewater Authority
RE: Consent Decree Public Comments
c/o Natasha Long
1250 Market Street
Suite 3050
Chattanooga, TN 37402

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering such information, the information submitted is, to the best of my knowledge and

belief, true, accurate and complete. I have no personal knowledge that the information submitted is other than true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,

Michael Patrick, P.E.
Executive Director

Enclosure: Draft Incident Response Plan *(IRP)* Deliverable

Cc:

By Email:
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Re: DJ # 90-5-1-1-11394

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Incident Response Plan Draft Submitted for Review by EPA and TDEC

Prepared for

The United States Environmental Protection Agency and Tennessee Department of Environment and Conservation

Case No. 1:23-cv-00225

Prepared by

Hamilton County
Water & Wastewater
Treatment Authority (WWTA)

Submitted by

LJA Engineering, Inc.
1110 Market Street, Suite 314
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June 13th, 2025

Table of Contents

Acronyms and Abbreviations

AAR/IP	After Action Report/Improvement Plan
AP	Action Plan
AWWA	American Water Works Association
ASCE	American Society of Chemical Engineers
BEOP	Basic Emergency Operations Plan
CBR	Chemical, Biological, and Radiological
CD	Consent Decree
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
CFR	Code of Federal Regulations
CIKR	Critical Infrastructure and Key Resources
CMOM	Capacity Management, Operations, and Maintenance
CPR	Cardiopulmonary Resuscitation
DAT	Damage Assessment Team
DHS	Department of Homeland Security
EAL	Emergency Action Level
EOC	Emergency Operations Center
EOP	Emergency Operations Plan
EMI	Emergency Management Institute
EPCRA	Emergency Planning and Community Right To Know Act
ESF	Emergency Support Function
FEMA	Federal Emergency Management Agency
FOUO	For Official Use Only
HAZWOPER	Hazardous Waste Operations and Emergency Response [29 CFR 1910.120]
HCOEM	Hamilton County Office of Emergency Management
HSEEP	Homeland Security Exercise and Evaluation Program
I&I	Inflow and Infiltration
IAP	Incident Action Plan
IC	Incident Commander
ICS	Incident Command System
ISS	Interceptor Sewer System for the City of Chattanooga
IMT	Incident Management Team
IOR	Initial Overflow Report
IRP	Incident Response Plan

LEL	Lower Explosive Limit
LEPC	Local Emergency Planning Committee
LNO	Liaison Officer
LSC	Logistics Section Chief
MBEC	Moccasin Bend Environmental Campus
MGD	million gallons per day
MSDS	Material Safety Data Sheet
NACWA	National Association of Clean Water Agencies
NIMS	National Incident Management System
NPDES	National Pollution Discharge Elimination System
NRC	National Response Center
NRF	National Response Framework
OSC	Operations Section Chief
PIO	Public Information Officer
PPE	personal protective equipment
RQ	reportable quantity
SCADA	Supervisory Control and Data Acquisition
SDS	Safety Data Sheet under Globally Harmonized System (formerly called MSDS)
SEOC	State Emergency Operations Center
SERC	State Emergency Response Commission
SOP	Standard Operating Procedure
SORP	Sanitary Sewer Overflow Response Plan
SSO	Sanitary Sewer Overflow
TCWN	Tennessee Clean Water Network
TDEC	Tennessee Department of Environment and Conservation
TEMA	Tennessee Emergency Management Agency
UC	Unified Command
USEPA	U.S. Environmental Protection Agency
WCTS	Wastewater Collection and Transmission System
WEF	Water Environment Federation
WWTP	Wastewater Treatment Plant

Definitions

Action Plans: Specific plans designed to be used during the response to a threat or incident. Action plans should be easy to use and contain simple instruction (along with checklists, flow charts, and procedures) to support staff in the field or decision officials during the management of a crisis.

Acute: Severe but of short duration. Acute health effects are those that occur immediately after exposure to hazardous chemicals.

Ambient: Ambient temperatures reflect the temperature of the surrounding air or water.

Capacity, Management, Operations, and Maintenance (CMOM): A flexible program of accepted industry practices to properly manage, operate, and maintain sanitary wastewater collection, transmission and treatment systems, investigate capacity-constrained areas of these systems, and respond to SSO events.

Consent Decree: United States of America and the State of Tennessee, et. al. v. Hamilton County Water and Wastewater Treatment Authority. Case No. 1:23cv-00225 (signed July 16, 2024).

Containment: Includes all activities necessary to bring the scene of a hazardous materials incident to a point of stabilization, and to the greatest degree of safety possible.

Contamination: The process of transferring a hazardous material from its source to people, animals, the environment, or equipment, which may act as a carrier.

Decontamination: The physical or chemical process of reducing and preventing the spread of contamination from persons and equipment.

Disposal: The removal of waste material to a site or facility that is specifically designed and permitted to receive such wastes.

Department of Justice (DOJ): The United States Department of Justice and any of its successor departments or agencies.

Drill / Exercise: A simulated accident or release set up to test emergency response and coordination methods.

Emergency Operations Center (EOC): A pre-designated facility established by an agency or jurisdiction to coordinate the overall agency or jurisdictional response and support to an emergency. However, the EOC may be located at any location based on the disaster event.

Emergency Response: Emergency response is defined in CFR 1910.120(a)(3) as follows: Emergency response or responding to emergencies means a response effort by employees from outside the immediate release area or by other designated responders (i.e., mutual-aid groups, local fire departments, etc.) to an occurrence which results, or is likely to result in, an uncontrolled release of a hazardous substance. Responses to incidental releases of hazardous substances where the substance can be absorbed, neutralized, or otherwise controlled at the time of release by employees in the immediate release area or by maintenance personnel are not considered emergency responses within the scope of this standard. Responses to releases of hazardous substances where there is not a potential safety or health hazard (i.e., fire, explosion, or chemical exposure) are not considered emergency responses.

Incident Response Plan (IRP): A document developed by the utility that described the actions that the utility staff would take in the event of a natural disaster, significant event, or terrorist activity.

Environmental Protection Agency (EPA): The United States Environmental Protection Agency and any of its successor departments or agencies.

Emergency Planning and Community Right to Know Act (EPCRA): An acronym for the Emergency Planning and Community Right to Know Act of 1996. This Act covers reporting requirements and the development of hazards, vulnerability, and risk analyses.

Evacuation: The physical relocation of people threatened by an incident.

Executive Director: The Executive Director of the WWTA is responsible for oversight and management the WWTA.

Facility: Defined for Section 302 of EPCRA as all buildings, equipment, structures, and other stationary items that are located on a single site or contiguous sites owned or operated by the same person. This also includes motor vehicles, rolling stock, aircraft, and roadways.

Flash Point: The flash point of a liquid is the lowest temperature at which enough vapor is given off to form an ignitable mixture with air near the surface of the liquid.

Force Main: Any pipe that receives and conveys, under pressure, wastewater from the discharge side of a Pump Station. A Force Main is intended to convey wastewater under pressure.

Gravity Sewer Line or Gravity Sewer: A pipe that receives, contains and conveys wastewater not normally under pressure, but is intended to flow unassisted under the influence of gravity.

Hazardous Materials (HazMat): Substances, which are capable of causing substantial harm to people, property, and the environment when, mishandled or accidentally released. These include explosives, gases, flammable liquids, flammable solids, oxidizers and organic peroxides, poisonous and etiologic materials, radioactive materials, corrosive materials, and other regulated materials.

Hazardous Materials Response Team (HazMat): A specially trained group of personnel that are equipped to deal with spills or releases of hazardous materials.

Highly Hazardous Substances (HHS): Chemicals that have been identified by EPA on the basis of toxicity and have been listed under the Emergency Planning and Community Right to Know.

Hot Zone: The hot zone is the area that has the highest degree of hazard at an accidental release site. This zone is closest to the actual incident location and must be considered by first responders as extremely dangerous and possibly life threatening. Everything and everyone that is currently in or later enters the hot zone is considered to be contaminated. Everything and everyone that is contaminated must be decontaminated before leaving.

Immediately Dangerous to Life and Health (IDLH): IDLH means an atmospheric concentration of any toxic, corrosive, or asphyxiant substance that poses an immediate threat to life or would interfere with an individual's ability to escape from a dangerous atmosphere (29 CFR 1910.120).

Incident: A fire, release, or potential release of a hazardous material.

Incident Commander (IC): The on-scene, local, state, or federal official responsible for coordinating the hazardous material response action. The senior fire department officer that is on the scene will typically be the incident commander for a single jurisdiction hazardous materials incident involving multiple response agencies.

Incident Command System (ICS): A standardized on-scene emergency management concept specifically designed to allow users to adopt an integrated organization structure equal to the complexity and demands of small scale or large-scale incidents, without being hindered by jurisdictional boundaries.

Level of Concern (LOC): The airborne concentration of an extremely hazardous substance above which there may be serious irreversible health effects or death because of a single exposure for a relatively short period.

Local Emergency Planning Committee (LEPC): A committee appointed by the State Emergency Response Commission (SERC), as required by EPCRA, to formulate comprehensive emergency plans for its district.

Major Release: This is a release of a hazardous material where the atmospheric concentration meets or exceeds the IDLH threshold.

Material Safety Data Sheet (MSDS) or called Safety Data Sheet (SDS) per Globally Harmonized System: Provided by manufacturers and blenders of chemicals; contains information about chemical composition, physical and chemical properties, health and safety hazards, emergency response and waste disposal of the material as per 29 CFR 1910.120.

Minor Release: This is a release of a hazardous material where the atmospheric concentration is below the IDLH threshold.

Personal Protective Equipment (PPE): Equipment designed to protect the wearer's skin, eyes, or other body parts from hazardous materials. These include liquid splash-protective clothing, vapor-protective clothing, and breathing apparatus.

Publicly Owned Treatment Works (POTW): A publicly owned treatment works is a wastewater treatment facility (WWTF) and its entire infrastructure that is owned by a state or municipality.

Pump Station: Facilities owned or operated by the WWTA that are comprised of pumps which lift wastewater to a higher hydraulic elevation, including all related electrical, mechanical, and structural systems necessary to the operation of that pump station; provided, however, this definition shall not include any residential grinder pumps.

Remedial Actions: Actions consistent with a permanent remedy, which are necessary to prevent or minimize the release of hazardous materials so that they do not spread or cause harm.

Reportable Quantity (RQ): The quantity of a hazardous substance that triggers reporting under Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). If a substance is released or spilled in a quantity that exceeds its RQ, the release or spill must be reported to the National Response Center (NRC), as well as to the SERC, and the community emergency coordinator for areas likely to be affected by the release or spill.

Sheltering in Place: The act of keeping people in an existing location without moving them (sheltering) if they are threatened by a release incident. This public protection option is appropriate when evacuation would cause people to be exposed to hazardous atmospheres. A crucial requirement involves "buttoning up" any openings in the shelter to minimize or stop the infiltration of the hazardous atmosphere. This includes the shutdown of air handling systems and air conditioners.

State Emergency Response Commission (SERC): Commission appointed by the State Governor according to the requirements of EPCRA, duties of the commission include designating emergency planning districts, appointing LEPC's, supervising and coordinating the activities of

planning committees, reviewing emergency plans, receiving chemical release notifications, and establishing procedures for receiving and processing requests from the public for information.

Sanitary Sewer Overflow (SSO): Any discharge of wastewater to waters of the United States or the State from the WWTA's Sewer System through a point source not permitted in any NPDES permit, as well as any overflow, spill, or release of wastewater to public or private property from the Sewer System that may not have reached waters of the United States or the State, including all Building Backups.

Tennessee Clean Water Network (TCWN): TCWM shall mean the Tennessee Clean Water Network

Tennessee Department of Environment and Conservation (TDEC): The government agency responsible for safeguarding the health and safety of Tennessee citizens from environmental hazards; protecting and improving the quality of Tennessee's land, air and water; and managing the Tennessee State Parks system.

Tennessee Emergency Management Agency (TEMA): TEMA has plans in place to respond to any HazMat spill on highways, rivers, rails, or public property. TEMA routinely provides an area coordinator, who will usually also be a qualified HazMat technician or specialist, to assist or advise local jurisdictions with significant releases. TEMA will always support and back-up those responders with whatever resources or labor that they might request. If necessary, TEMA will either contract HazMat companies, request federal resources, and labor to assist in the response or both.

Threshold Planning Quantity (TPQ): A quantity designated for each chemical on the list of Extremely Hazardous Substance that triggers notification by facilities to the SERC that such facilities are subject to emergency planning under EPCRA.

User: Any person that contributes, causes, or permits the contribution or introduction of wastewater or pollutants into the WWTA WCTS, whether intentional or unintentional, and whether direct or indirect.

Wastewater Collection and Transmission System (WCTS): The WCTS is the wastewater collection, retention, and transmission systems, including all gravity sewer lines, force mains, pump stations, manholes, and other related appurtenances designed to collect and convey domestic, commercial, industrial wastewaters and sewer to the WWTP.

Wastewater Treatment Plant (WWTP): WWTP shall mean devices or systems used in the storage, treatment, recycling, and reclamation of municipal wastewater at the Signal Mountain WWTP.

WWTA: Water and Wastewater Treatment Authority is responsible for the planning, management, operation, and maintenance of the WCTS and WWTP for unincorporated areas of Hamilton County, Tennessee and the surrounding municipalities of East Ridge, Lakesite, Lookout Mountain, Red Bank, Ridgeside, Signal Mountain, and Soddy Daisy.

1.0 Introduction

1.1 Purpose

The Hamilton County Water and Wastewater Treatment Authority (WWTA) entered into a consent decree with the United States and the State of Tennessee in the case styled *United States of America et. al. v. Hamilton County Water and Wastewater Treatment Authority, No. 1:23cv-00225* ("CD"), which became effective on July 16, 2024. The Hamilton County Water and Wastewater Treatment Authority (WWTA) prepared this Incident Response Plan (IRP) as part of their Capacity, Management, Operations and Maintenance (CMOM) Program. Environmental Protection Agency ("EPA") and Tennessee Department of Environment and Conservation ("TDEC").

The purpose of this program for the WWTA is to provide adequate guidelines to improve the reliability of operations at WWTA facilities and ensure they are operating properly to convey flows throughout the system.

Goals of this Incident Response Plan include the following:

- Provide Standard Operating Procedures during routine and catastrophic incident responses
- Reduce the impact of incidents through WWTA staff preparation and response effectiveness
- Provide criteria for notifying the public and regulatory authorities
- Reduce adverse effects to public health and the environment

1.2 Consent Decree Requirements

In accordance with the requirements set in the CD, Appendix E, CMOM Programs: Subsection (b) Incident Response Plan; the IRP shall include the following:

Within thirteen (13) Months after the Effective Date of this Consent Decree, WWTA shall submit to EPA for review and approval an Incident Response Plan. The Plan shall address both routine incidents and catastrophic incidents. Routine incidents include such situations as overflowing manholes, line breaks, localized electrical failure, and pump station outages. Catastrophic incidents include floods, tornadoes, earthquakes, or other natural events; serious chemical spills; and widespread electrical failure. The Plan shall address areas of vulnerability and determine the effect of an incident-related failure to operations, equipment, and public safety and health

based upon such factors as topography, weather, Sewer System size, and other site-specific factors. The Plan shall include standard forms. The Plan shall have the following components:

(1) The WWTP component of the Incident Response Plan shall establish standard operating procedures for use in responses to incidents, including changes in process controls.

(2) The WCTS component of the Incident Response Plan shall establish standard operating procedures for use in incident responses, including identification of the actions staff should take in the event of incidents (specific to the type of incident that could occur); criteria for initiating and ceasing responses to incidents; identification of appropriate repair equipment and sources thereof; and instructions on how to operate equipment and systems during an incident when they are not functioning as intended but are not fully inoperable.

(3) In addition to the reporting requirements set forth in Section IX of the Consent Decree (Reporting Requirements), WWTA shall establish, in coordination with public health authorities:

> *(a) Criteria to be used as the basis for immediately notifying the public and other impacted entities, such as users with a downstream water intake, of an incident affecting the Sewer System, including the occurrence of a SSO, Prohibited Bypass, or effluent limit violation;*
>
> *(b) A list identifying, by name and work phone number, all staff who are responsible for notifying the public;*
>
> *(c) A list identifying, by name and work phone number, all public contacts, including local media outlets, who must be contacted during an incident;*
>
> *(d) A list identifying staff, by name and phone number, who are authorized to make public statements during incidents; and*
>
> *(e) Pre-scripted news releases for various types of incidents.*

(4) In addition to the notification requirements set forth in the NPDES Permit, and the reporting requirements set forth in Section IX of the Consent Decree (Reporting Requirements), WWTA shall establish, in coordination with public health authorities:

> *(a) Criteria to be used as the basis for immediately notifying regulatory authorities, TDEC, and the Public Health Authorities of any incident affecting the Sewer System, including the occurrence of a SSO, Prohibited Bypass, or effluent limit violation;*
>
> *(b) A list identifying, by name and phone number, all staff who are responsible for notifying the regulatory authorities;*

(c) A list identifying, by name and phone number, all officials who must be contacted; and

(d) Standard reporting forms

1.3 IRP Organization

This IRP is organized into nine sections. Appendices are included with material such as schedules, action plans, and phone contact lists. Table 1.1 provides a brief summary of the content of each section.

Table 1.1
Report Organization

Section Number	Description
Section 1	Introduction: Describes the purpose, goals, authority, CD Requirements, and overview of the organization of the IRP.
Section 2	General Incident Response Planning Information: Describes the agreements between WWTA and other agencies relative to emergency planning and response.
Section 3	Emergency Response Information: Provides certain background information that is specific to the WWTA, such as a system map, and emergency equipment.
Section 4	Concept of Operations: Describes the incident command system and describes how WWTA will adapt it to ensure that there is a clear of chain-of-command for interactions between the WWTA and outside response agencies, such as the local Fire Department.
Section 5	Crisis Communication Plan: Provides procedures and policies for communicating information to the public and regulatory agencies during an emergency. Guidelines for communicating to the public through the media are provided.
Section 6	IRP Activation and Threat Characterization: Explains how threats may be received, as well as what steps to take in order to activate the IRP.
Section 7	Emergency Response, Recovery, and Termination: Explains the three phases of an emergency: response, recovery, and termination. General actions and guidance are provided for each phase. The guidance in this section should be used in conjunction with specific APs and SOPs.
Section 8	Standard Operating Procedures: Presents a summary of incident specific SOPs to respond to and recover from emergency events.
Appendix A	Schedule for Implementation
Appendix B	ICS Forms
Appendix C	ICS Position Guides

Appendix D	News Release Template
Appendix E	External Contact List
Appendix F	WWTA Pump Stations
Appendix G	Incident Investigation Report
Appendix H	WWTA Organizational Chart

1.4 Document Control

The information contained in this IRP is sensitive in nature, but unclassified. This IRP is considered For Official Use Only (FOUO) and a statement describing the provisions of FOUO is provided in the front of this document. Distribution of the full version of this plan should be limited to essential personnel governed by a need-to-know basis.

In addition, general distribution of selected sections, APs, and SOPs may be issued to employees. Document control policies include limiting the distribution of the WWTA IRP hardcopies to specific staff and not distributing digital copies of the document. The WWTA IRP documents are numbered and assigned to specific persons as defined in the Distribution Log in the front of this document.

1.5 Plan Updates

The WWTA IRP is periodically reviewed by the Executive Director of the WWTA (and other appropriate personnel). Based on this review, updates are prepared and issued. For instance, updates to specific sections are made to the IRP if there are changes in the staff contact list, and roles and responsibilities of those involved in response activities. Updates are also included whenever there is an operational change to the WCTS that affects IRP content.

The Executive Director of the WWTA must authorize and issue updates to the IRP. When this IRP is updated, the reason for the update, the date the update is issued, and the name of the person that approved the revision will be provided in the revision log included at the beginning of this document.

WWTA will provide the Hamilton County Office of Emergency Management (HCOEM) with a copy of the Final IRP Plan (once approved by the EPA) and any future revisions as documented in the revision log.

1.6 Guidance Documents

Multiple Federal, State, local, industry, and other organizational resources exist to support wastewater facility emergency planning and response. Guidance, tools, resources, and references considered in development of this IRP include, but are not limited to, the following:

- *Emergency Response Plan Guidance for Wastewater Systems*, Water Environment Research Foundation (WERF), 2004
- National Incident Management System (NIMS) – Provides guidance and utilizes Incident Command System (ICS) standards and protocols to foster standardized response procedures across the United States. The ICS command and management structure provides the framework for WWTA incident management response. Additional resources include:
  - National Incident Management System – http://www.fema.gov/national-incident- management-system
  - FEMA Response & Recovery – http://www.fema.gov/response-recovery
  - USEPA link – for damage assessments and resources https://www.epa.gov/superfund/natural-resource-damages-assessments
  - DHS Resources - http://www.dhs.gov/index.shtm
  - National Preparedness Guidelines (NPG) – https://www.dhs.gov/national-preparedness- guidelines
  - National Response Framework (NRF) – http://www.fema.gov/national-response- framework
  - National Infrastructure Protection Plan (NIPP) – https://www.dhs.gov/national- infrastructure-protection-plan
- Tennessee Water/Wastewater Agency Response Network (TnWARN), http://www.Tnwarn.org
- Tennessee Emergency Management Agency (TEMA) https://www.tn.gov/tema.html
- Hamilton County Office of Emergency Management and Homeland Security https://www.hamiltonready.org/
- American Society of Chemical Engineers (ASCE), Water Environment Federation (WEF), American Water Works Association (AWWA) - *Guidelines for the Physical Security of Wastewater/Stormwater Utilities*, 2006
- ASCE/WEF/AWWA - *Interim Voluntary Security Guidance for Wastewater/Stormwater Utilities*, 2004
- National Association of Clean Water Agencies (NACWA), *Protecting Wastewater Infrastructure Assets, Managing Decontamination Wastewater: A Utility Planning Tool*, 2005

- Training and Exercises:
  - *Homeland Security Exercise and Evaluation Program*, Volume 1, FEMA, February 2007. https://www.ojp.gov/pdffiles1/Archive/205244NCJRS.pdf
  - *NIMS Training Program*, Department of Homeland Security (DHS), September 2011. http://www.fema.gov/pdf/emergency/nims/nims_training_program.pdf
- USEPA, Association of Metropolitan Water Agencies (AMWA), American Public Works Association (APWA), AWWA, NACWA, National Association of Water Companies (NAWC), and WEF. *Effective Utility Management, a Primer for Water and Wastewater Utilities*, 2017 https://www.nacwa.org/docs/default-source/resources---public/eum-primer-final-1-24-17.pdf

2.0 General Incident Response Plan Information

2.1 Introduction

This section of the WWTA IRP describes the agreements between the WWTA and other agencies relative to emergency planning and response and the IRP relationship with other plans.

2.2 Partnership with Other County Agencies

The Hamilton County WWTA partners with other county agencies, such as the Hamilton County Office of Emergency Management (HCOEM), Emergency Communication, Sheriffs Department, and Fire Department. The WWTA staff contacts the dispatch office of Hamilton County Emergency Communication for emergencies when required. The dispatch agent of Hamilton County forwards the call to the appropriate emergency personnel based on the location of the call.

2.3 Mutual Aid Agreements

Mutual aid agreements are agreements between agencies, organizations, and jurisdictions that provide a mechanism to obtain emergency assistance quickly in the form of personnel, equipment, materials, and other associated services. The primary objective is to facilitate rapid, short-term deployment of emergency support prior to, during, and after an incident.

Typically, in the case of a wastewater utility, a mutual aid agreement would consist of an agreement between WWTA and one or more neighboring utilities to share resources during an emergency. Currently, there are no formal written mutual aid agreements between WWTA and other wastewater utilities.

2.4 Relationship between IRP and Other Documents

During an emergency, multiple guidelines may need to be followed. Measures must be taken to ensure that staff are clear on which documents (guidelines, plans, or procedures) govern a particular situation. Table 2.1 lists other documents that relate to the IRP, which have been developed by the WWTA. Consent Decree documents are located in CD Public Document Repository and the Chattanooga Public Library.

Table 2.1
Relationship of Other Plans to the IRP

Other Documents	Relationship to the WWTA IRP	Document Location
Sanitary Sewer Overflow Response Plan (SORP)	Provides information to response to SSOs and notification to regulatory agencies.	CD Public Document Repository
Pump Station Operations and Preventative Maintenance Program	Provides detailed information on pump station operations.	CD Public Document Repository (per CD Deliverable Requirements)
Gravity Line Preventative Maintenance Program (GLPMP)	Provides detailed information on sewer gravity line maintenance	

3.0 Emergency Response Information

3.1 Emergency Spill Response and Emergency Spill Equipment

Hamilton County operates its Water Quality Program under the provisions of the State of Tennessee NPDES MS4 Permit Number TNS075566. Hamilton County Water Quality Program is classified as a Small Municipal Separate Stormwater Sewer System (MS4) and consists of the following nine permittees: City of East Ridge, City of Red Bank, City of Collegedale, City of Lakeside, City of Ridgeside, City of Soddy-Daisy, Town of Walden, Town of Lookout Mountain, and unincorporated Hamilton County.

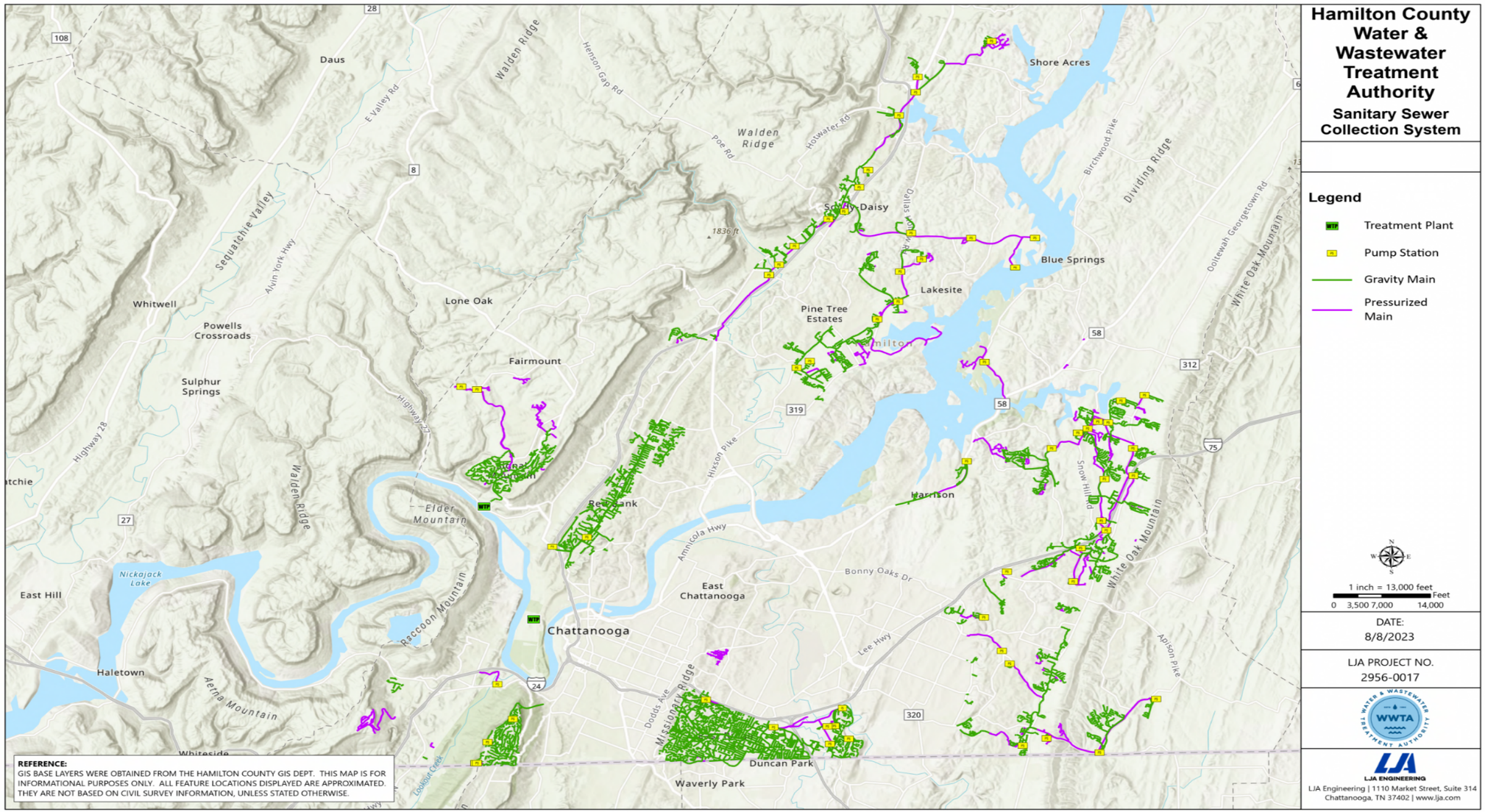
A map of the Hamilton County WWTA wastewater collection system is available in Figure 3.1.

Emergency Equipment: The WWTA maintains an inventory list of equipment and spare parts available during routine activities and during an emergency. Staff inspect equipment inventory routinely. The WWTA maintains three sewer line cleaning trucks. The WWTA uses various pump rental companies for rentals in an emergency. Pump motors are contracted out for repair. Pump stations typically are equipped with two to three pumps, allowing for redundancy and backup pumping capacity.

Emergency Communications Equipment: WWTA personnel communicate via telephone and email WWTA staff communicate to emergency management personnel, including police, fire, and rescue, via telephone. WWTA Administrative Staff communicate with field staff via telephone and email. Sewer maintenance personnel communicate using mobile phones. In addition, WWTA staff communicate with City and County emergency management personnel, including police, fire, and rescue personnel. Each pump station is equipped with an emergency system that alters the WWTA staff of high well levels, power outages, and pump failures.

Generators and Backup Power: In the event of a power loss, a limited number of the pump stations are equipped with fixed generators with automatic control. Stations without fixed generators are equipped with generator quick-connects for portable generators. Contracted electricians conduct preventive maintenance on generators every six months. The WWTA maintains four portable generators, which are considered adequate to manage emergency power needs within the WCTS. Portable generators are available and can be moved and utilized readily between stations when needed in an emergency. The WWTA has six diesel backup pumps for redundancy of pump stations. The backup pumps are portable and located at critical pump stations throughout the WWTA collection system and transported to other pump stations as needed. The WWTA supplies fuel for generators and backup pumps.

Figure 3.1
Overview of the WWTA WCTS



4.0 Concept of Operations

4.1 Introduction

Managing emergency response operations, especially those involving multiple jurisdictions, can be challenging. Effective incident management requires a command structure that facilitates cooperation between various divisions and departments within the WWTA, as well as outside agencies, the private sector, and citizens. NIMS (www.fema.gov/nims/) provides a consistent nationwide template to enable all government, private sector, and non-governmental organizations to work together during domestic incidents. NIMS utilizes Incident Command Systems (ICS) principles to support emergency response operations and to provide common management principles among jurisdictions and disciplines.

The ICS fosters effective coordination among responders at the scene of an emergency, which is a critical success factor in recovery following a major incident. The ICS and Unified Command (UC) are widely used to support successful response operations. The ICS/UC is an efficient and scalable on-site tool to manage incidents involving multiple agencies. Use of ICS/UC concepts allows the utility to coordinate with local, state, and federal government responders and facilitates a clear chain of command between the utility and other emergency responders. In a UC structure, the concept of Unity of Command allows utility staff to take direction from the utility IC who is part of UC. The WWTA relies on emergency first responders (e.g., fire department) to initiate the ICS.

This section summarizes direction and control of emergency response operations within WWTA and defines the WWTA Incident Management Team (IMT).

4.2 Emergency Action Levels

Emergencies may include routine incidents, such as overflowing manholes, line breaks, electrical failure, pump station outages, and equipment failures. Catastrophic emergencies may include floods, tornadoes, earthquakes, snow and ice, and other natural events. In addition, man-made disasters include chemical spills and widespread long-term electrical failure. Table 4.1 provides Emergency Action Levels (EALs) and associated actions of the IMT.

Table 4.1
Emergency Action Levels

Emergency Action Levels	Example	Incident Management Team Action	Guidance Criteria
Low Level Emergency	• Pipe break • Pump failure	• Managed by WWTA personnel in accordance with SOPs	No external threat or impact; Problem resolved in timely manner
Medium Level Emergency	• SSO • Large main break • Large force main break • Loss of power to pump station • Major pump station failure • Sewer system collapse causing backups • Extreme weather impact forecasted at 2 days	• Managed by WWTA personnel in accordance with SOPs • Notify the TDEC as required for compliance with regulatory requirements and permit • Notification of Public Health, as needed	Potential threat to health, property, or the environment
High Level Emergency	• Long-term and wide-spread loss of power (including backup power) to pump stations • Explosive atmosphere or explosion in sewer • Potential impact to downstream water intake from contaminant upstream • Injuries/fatalities occurred due to an incident • Extreme weather impact forecasted to hit in 12 to 24 hours (including probable maximum flood) • Unauthorized entry at a pump station or CSOTF that will require police investigation	• Executive Director and Chief Engineer • Activate the IRP • Contact and coordinate with local response agencies • Notification of Public Health, as needed • Notification of TDEC, as required for compliance with regulatory requirements and permit • Notification of Downstream Users, as needed • Local Agency Notification (i.e. Police to investigate unauthorized entry)	Immediate or widespread threat to health, property, or the environment. Requires the assistance of first responders and outside agencies and resources. WWTA becomes a support function under the ICS and UC as dictated by the incident (i.e. Fire Department assumes command and control in a hazardous materials incident)

These guidelines are suggested criteria to use when determining the EAL. Initially, it may be difficult to determine the EAL because of a lack of information and rapidly changing conditions. Subsequent EALs may be increased or decreased as the emergency progresses and more information becomes available.

4.3 Direction and Control

This section will identify WWTA staff members who will be involved in incident response and recovery and will identify roles and responsibilities during incidents involving the WCTS. This section will also identify external departments and/or agencies that may provide assistance during an incident.

WWTA Executive Director – Responsible for communication to external agencies, public and media notifications. All three (3) branches of the WWTA management system report to the Executive Director. These branches include: Administration & Public Relations, Rehabilitation & Maintenance, and New Construction.

Chief Engineer – receives the directive from the WWTA Executive Director and coordinates with the Wastewater Manager and Wastewater Clerk to execute the directive.

Wastewater Manager – receives calls and/or notifications from Wastewater Technicians or other WWTA personnel regarding incidents and will coordinate/call in other personnel, equipment, or other staff as needed.

Wastewater Clerk/Admin. Staff – receives and records pertinent information from public regarding incidents. Contacts appropriate WW technician

WWTA Wastewater Technician/First Responder – may receive incident notifications from the Admin. Staff, telemetry system, or other WWTA personnel regarding incidents

4.3.1 Incident Command

In the ICS, the organizational structure includes an IC who leads the Command General Staff (Officers and Section Chiefs). The ICS is effective as it assigns a single person to be in charge and accountable for actions taken at the incident site. The IC is responsible for all aspects of the response.

Based on the location of the incident in the WWTA collection system, the appropriate City Fire Department and the Hamilton County Ambulance Service will respond to chemical emergencies. The first emergency responder from these outside agencies will serve as the IC. If a security issue is discovered, the WWTA will contact the appropriate city police department and provide the dispatcher relevant information (who, what, when, where, why). WWTA employees should wait for law enforcement assistance.

In general, the WWTA employee who first discovers a problem should notify the Wastewater Manager as quickly as possible. The Wastewater Manager will serve as the initial IC and coordinate response activities until other members of the IMT arrive or are notified (see below for a description of roles and responsibilities for each member of the IMT).

IC requirements for initial response may include:

- Directing staff and persons who may be affected by the emergency to evacuate, shelter-in-place, or take other protective actions.
- Requesting emergency assistance from local emergency response agencies (fire, police, and medical).
- Notifying staff and regulatory agencies in accordance with SOPs.

If local emergency response agencies are called to perform rescue, fire, chemical release, and security assistance, then IC responsibilities must be turned over to the lead fire or law enforcement official upon his or her arrival. The WWTA's IC, in UC with other emergency response agencies, provides assistance and resources, by as described below.

4.3.2 WWTA Incident Management Team

The WWTA's Incident Management Team (IMT) consists of personnel assigned to perform specific duties and responsibilities as defined by the IMT position. The responsibilities associated with each position described below are compatible with the ICS. Appendix C, Incident Command System Position Guides, provides position-specific checklists for command and general staff positions per NIMS guidance.

Based on the nature of the incident and the resources available, a person may take on more than one IMT role. IMT support may also be obtained from other agencies. In the event WWTA staff members are unavailable to respond to an emergency, alternate staff assume responsibility.

The IC should consider other positions on the IMT for staffing, as needed. Specific training in emergency response is recommended for primary and alternate team members.

Appendix H depicts the organizational alignment of the WWTA IMT. The Executive Group, shown in the IC in Organizational Chart, will serve as the WWTA interface and provide strategic guidance to the IC to support development of incident objectives.

Roles for each IMT member are designated in Figure 4.1. In addition, position-specific guides, provided in Appendix C, are to be used as operational tools for each of the IMT positions during response operations. These forms are based on NIMS guidance; they would likely be used only during a "High Emergency Action Level."

4.3.2.1 Incident Commander (WWTA Executive Director)

The IC is responsible for the overall management of the emergency and oversees collection, evaluation, and dissemination of information about the incident to other members of the WWTA IMT. Depending on the nature and extent of the emergency, the IC may activate additional units and/or technical specialists. The IC is responsible for control of the emergency incident. They will serve as IC unless an outside, non-WWTA agency has jurisdiction over the incident.

Responsibilities associated with this position may include, but are not limited to the following:

- Activate the WWTA IMT.
- Assess the emergency situation.
- Develop objectives and strategies in coordination with the WWTA IMT.
- Establish frequency of reports and briefings.
- Approve the Incident Action Plan (IAP).
- Coordinate with the Operations Section Chief (OSC) on status of response actions and support.
- Consult with the OSC on need to activate the WWTA Emergency Operations Center (EOC). Activate, staff, and manage the WWTA EOC.
- Work with the Logistics Section Chief (LSC) to formulate and release information to the Executive Director about the incident to elected officials, the news media, and the public.
- Coordinate with LNO to ensure that all regulatory agencies affected by the emergency have been notified.
- Arrange for photographic or video documentation of response and recovery operations if warranted.
- Coordinate the compilation of the incident information and obtain or develop incident maps.
- Periodically check progress on assigned tasks and, if necessary, revise strategic goals and IAP.
- Review and approve status reports and damage assessments for WWTA property, facilities, and infrastructure.
- Determine with OSC the requirements for termination of the emergency condition and approve incident termination.
- Appoint a Recovery Manager. Refer to Section 7 for Recovery Manager Responsibilities.
- Document all significant actions and information on the Unit Log and complete appropriate IAP Forms (Appendix B).

- Develop an After-Action Report/Improvement Plan (AAR/IP) based on the response operations and use the findings to critique and update the WWTA IRP as necessary.
- Refer to the position-specific guide in Appendix C.

4.3.2.2 Liaison Officer (WWTA Executive Director)

The LNO serves as the point-of-contact between the IC and outside entities (governmental, non-governmental, and private). Responsibilities associated with this position may include, but are not limited to the following:

- Obtain briefings from IC regarding status of incident.
- As needed, ensure coordination between WWTA IMT and outside agency Incident Command/UC, Hamilton County Emergency Management Team, and other regulatory agencies.
- If the WWTA EOC is activated, ensure that the Hamilton County EOC is aware of the location and status of the WWTA EOC.
- Coordinate with the LSC to establish contact with agencies and organizations that may provide mutual aid, other types of emergency assistance, and staging areas.
- Document all significant actions and information on the Unit Log and complete appropriate IAP Forms in Appendix B.
- Refer to the position-specific guide in Appendix C.

4.3.2.3 Public Information Officer (Deputy Director of Administration)

The WWTA PIO is responsible for formulation and release of information about the incident to the news media and the public. Depending on the nature and extent of the incident, WWTA staff may assist the WWTA PIO. The WWTA PIO should work closely with the IC. Responsibilities of the WWTA PIO may include, but are not limited to the following:

- Serve as WWTA spokesperson, if directed by the Executive Director of WWTA.
- Coordinate the preparation and release of news information to the media and public regarding service interruption, impacts to the public, and actions taken by WWTA to restore services.
- Establish location of information center for the news media and the public.
- Obtain approval for release of information from the IC and Director of WWTA.
- When possible and appropriate, record using audio or video all interviews and copy all news releases. Contact news media to correct erroneous or misleading information the media is providing to the public.

- If applicable, coordinate information releases with staff from other impacted jurisdictions. Ensure that information provided to the public is consistent across jurisdiction boundaries. As necessary, establish a Joint Information Center (JIC) with PIOs from other jurisdictions and agencies to support consistent message development.
- Coordinate with the media on periodic updates regarding response status.
- Coordinate response to customer telephone calls.
- Establish updated telephone greeting for customers, as required.
- Establish updated website information for the public, as required.
- Coordinate personnel notifications:
  - Notify and update WWTA personnel with emergency information.
  - Respond to communications from WWTA staff.
- Document all significant actions and information on the Unit Log and complete appropriate IAP Forms in Appendix B.
- Refer to the position-specific guide in Appendix C.

4.3.2.4 Safety Officer (WWTA Wastewater Manager)

The Safety Officer is responsible for monitoring and assessing hazardous and unsafe situations and developing measures for assuring personnel safety. Depending upon the nature and extent of the emergency, the Safety Officer may activate additional staff from other disciplines, and/or specialized technical support. Responsibilities associated with this position may include, but are not limited to the following:

- Obtain briefing from the IC.
- Prepare safety briefing.
- Identify hazardous situations associated with the incident and ensure that adequate levels of protective equipment are available and are being properly used.
- Notify the appropriate response organizations of any hazardous or unsafe situations associated with the incident scene.
- Identify potentially unsafe acts and ensure implementation of corrective actions.
- Review proposed emergency response actions for safety. If an action is or may be unsafe, assist in identifying protective measures or alternative options.
- If applicable, ensure adequate sanitation and safety in food and beverage preparation.

- Track accidents and/or injuries to response personnel. Develop and implement recommendations for preventative and corrective actions.
- Investigate any accidents that occur within the incident area. Ensure that the scene is preserved for investigation and that the accident is properly documented.
- Document all significant actions and information on the Unit Log and complete appropriate IAP Forms in Appendix B.
- Refer to the position-specific guide in Appendix C.

4.3.2.5 Logistics Section Chief (WWTA Chief Engineer)

The LSC is primarily responsible for providing facilities, services, and materials in support of the incident. In addition, the LSC is responsible for all aspects of contracting outside services and purchasing materials as needed to respond to or recover from an emergency. Responsibilities of the LSC may include, but are not limited to the following:

- Coordinate with the Finance Section Chief regarding purchasing guidelines and processing purchase orders for emergency supplies and equipment.
- Ensure completion of incident documentation for internal evaluation, insurance processing, and legal records.
- Establish and maintain a system for requesting and releasing additional resources.
- Evaluate the adequacy of the current communications system. Address any problems identified during the evaluation and develop a communication plan.
- Maintain and update the list of emergency service providers and suppliers.
- Monitor any medical care needs and appoint a Medical Unit Leader as necessary.
  - Determine status of any employees under medical treatment and report status to the IC.
  - Monitor status of employees, arrange for follow-up medical care, and support to family members for those injured during the incident.
- Document all significant actions and information on the Unit Log and complete appropriate IAP Forms Appendix B.
- Refer to the position-specific guide in Appendix C.

4.3.2.6 Operations Section Chief (WWTA Wastewater Manager)

Responsibilities of the OSC may include, but are not limited to the following:

- Coordinate actions of the initial emergency incident responders and IC.

- Ensure evacuation occurs and account for employees if necessary.
- Interface directly with the responding IC and provide technical assistance and status information of the incident.
- Ensure hazards have been analyzed and appropriate response organizations notified. Coordinate with Safety Officer.
- Communicate with appropriate WWTA operational staff.
- Communicate status of actions on-scene to the IC.
- Perform situation assessment and, if warranted, advise IC on activation of the WWTA EOC.
- Develop priorities for response, incident mitigation, and return to service of key operating systems.
- Assign personnel to support the on-scene response team.
- Advise IC on the need for engineering services to design and reconstruct systems.
- Advise IC on the need for external SCADA system support.
- Update the IC of decisions on-scene affecting the continuation of WWTA operations.
- Direct the Alternate OSC in the recovery of key systems.
- Serve as or designate a document control manager.
- Document all significant actions and information on the Unit Log and complete appropriate IAP Forms in Appendix B**.**
- Refer to the position-specific guide in Appendix C.

4.3.2.7 Planning Section Chief (WWTA Chief Engineer)

The Planning Section Chief is primarily responsible for collecting, evaluating, and disseminating information about the incident affecting the WWTA to other members of the WWTA IMT. The Planning Section Chief is also responsible for tracking resources (personnel, equipment, tools, etc.) that may be necessary for emergency response. The Planning Section Chief is also responsible for developing the IAP and implementing the Planning P (Section 4.2). Depending upon the nature and extent of the emergency, the Planning Section Chief may activate additional units or technical specialists. Responsibilities associated with this position may include, but are not limited to the following:

- Obtain briefing from the IC.
- Assign and contact WWTA personnel to provide planning-related support in accordance with the overall strategy established by the IC.
- Establish and maintain resource-tracking system.
- Compile and display incident status summary information. Also, obtain or

develop incident maps.

- Form and deploy damage assessment teams (DATs) to inspect facilities. Complete damage assessment status reports and obtain approval from the IC.
- Establish a system for collecting weather data, if necessary.
- Ensure the appropriate outside agencies have been notified.
- Ensure coordination among the WWTA IMT.
- Ensure that Planning Section staff observes the established level of operational security.
- Document all significant actions and information on the Unit Log and complete appropriate IAP Forms in Appendix B**.**
- Compile all records associated with an emergency incident and arrange for record storage in accordance with standard procedures.
- Refer to the position-specific guide in Appendix C.

4.3.2.8 Finance and Administration Section Chief (WWTA Accountant)

The Finance and Administration Section Chief is primarily responsible for all financial aspects of the incident affecting the WWTA. Responsibilities include maintaining an audit trail, billing, paying invoices, and documenting labor, materials, and services used during the incident. The Finance and Administration Section Chief is also responsible for preparing documentation for cost reimbursement. Responsibilities associated with this position may include, but are not limited to the following:

- Obtain briefing from the IC.
- Establish and/or confirm emergency purchasing guidelines.
- Meet with assisting and cooperating agencies to determine any cost-share agreements or financial obligations, as required. Request copies of all active response-related agreements.
- Initiate, maintain, and ensure completeness of documentation needed to support claims for emergency funds, including auditing and documenting labor, equipment, materials, and services.
- Initiate, maintain, and ensure completeness of documentation needed to support claims for injury and property damage.
- Document all significant actions and information on the Unit Log and complete appropriate IAP Forms in Appendix B.
- Refer to the position-specific guide in Appendix C.

4.3.3 Unified Command

A UC structure is a process used in multi-agency or multi-jurisdiction incidents to bring together the ICs of all major response organizations under the leadership of an overall IC. The UC structure can be expanded to suit any size emergency.

Under the UC, the WWTA IC may be asked to serve in UC with ICs from other jurisdictions such as law enforcement, fire, and public health. ICs serving in UC may also represent different geographical jurisdictions. The UC is used when multiple agencies have a stake in emergency response operations.

The UC serves to establish a common set of objectives and strategy for an incident without the loss of agency/jurisdictional authority, responsibility, or accountability. As stated previously, the WWTA staff would take direction from their IC from within the UC structure in the unity of command structure.

4.4 Emergency Response Operations

4.4.1 Initial Operations

WWTA personnel fulfilling roles and responsibilities identified above will accomplish initial emergency response operations. Depending on the nature and extent of the emergency, WWTA personnel may be located at the incident scene, the WWTA EOC, or the Hamilton County EOC.

Roles and responsibilities are identified in Section 4 for each WWTA IMT position; however, staffing levels will depend on the nature and extent of the emergency. For example, the WWTA IC may be solely responsible for managing incidents that occur within a building, are localized to a small area, and do not involve offsite emergency response agencies. Other emergencies may involve non-WWTA IMT members and activation of the WWTA EOC. Large-scale emergency incidents, including fire, explosion, hurricanes, tornadoes, and terrorist attack, may involve all WWTA IMT members and multiple offsite emergency response agencies. In these cases, WWTA will provide technical support and resources to a non-WWTA IC or the UC.

In large-scale incidents, resourcing is very important in emergency response and recovery. As set forth in the NRF, resource requests and support should be coordinated at the local level first, followed by state-level resources, and, once state resources are exhausted, by federal resources. The full range of resource availability is characterized as follows:

1. WWTA resources are utilized to support response.

2. As resources are exhausted, WWTA can utilize mutual aid agreements and other WWTA resources, as described in Section 2, to support response if internal resources are exhausted.

3. WWTA can request resources from the HCOEM as needed.

The HCOEM can provide resources to support response operations and can utilize county-to-county mutual aid. The State of Tennessee can also utilize state-to-state mutual aid agreements via the State EOC (SEOC) as well as request federal support through FEMA.

4.4.2 Sustained Operations

If the severity of an emergency incident requires sustained operations, the WWTA IC will determine the staff needed to maintain operations and continue emergency response. Off-duty staff may be called in as needed to ensure that appropriate staffing levels are maintained for the duration of the emergency.

To support sustained operations, the ICS emphasizes orderly and systematic planning using an IAP. The IAP is the central tool for planning during emergency response operations. The IAP is prepared by the Planning Section Chief with input from appropriate sections and units of the WWTA IMT. A copy of ICS Forms will, when compiled, become the IAP (as provided in Appendix B). These forms can also be found at https://training.fema.gov/icsresource/icsforms.aspx.

Incidents vary in their kind, complexity, size, and requirements for detailed and written plans. In an initial response for an incident that is readily controlled, a written plan may not be necessary. Larger, more complex incidents require an IAP to coordinate activities. The level of detail required in an IAP will vary according to the size and complexity of the response.

The IAP must be accurate and completely transmit information generated during the planning process. The IAP must be prepared and distributed prior to shift changes. An IAP must be prepared for each operational period or shift. A planning process has been developed as part of the ICS to facilitate development of an IAP in an orderly and systematic manner. This section explains the planning process required to develop an IAP. Following the planning steps allows expedited development of an IAP.

IAP development involves four major phases:

1. Set Incident Objectives

The IC, in concert with the OSC, sets objectives. The IC establishes the general strategy to be used and states major policy, legal, or fiscal constraints in accomplishing the objectives. After discussion, the incident goals and objectives are written on ICS Form-202 (Appendix B) and

delivered to the OSC, Planning Section Chief, the WWTA PIO, and the LNO to communicate the strategy.

The Planning Section Chief then prepares for the tactics meeting.

Guidelines for the IC on Setting Goals and Objectives

The IC sets goals and objectives. Three important guidelines include:

1. Goals and objectives must be clearly stated and measurable to track progress.
2. Goals and objectives must be attainable given the people, equipment, and supplies available during the operational period (shift).
3. Goals and objectives must be broad and flexible enough for the OSC to achieve them the best way possible under variable conditions.

2. Tactics Meeting

The IMT members review the IAP. The Planning Section Chief schedules and conducts the tactics meeting. The OSC directs how resources will be deployed to meet response objectives. Tactics must be specific and within the boundaries set by the IC's general control objectives (strategies). Following the tactics meeting, the OSC completes the Operational Planning Worksheet (ICS Form-215, Appendix B).

At this time, the OSC may consider the need for any alternative or back-up tactics and note these on the Incident Objectives Form (ICS Form-202, Appendix B) and Division/Group Assignment List (ICS Form-204, Appendix B).

3. The Planning Meeting

<u>Prepare for the Planning Meeting</u>

- Establish operational planning period (or operations shifts) with the IC.
- Determine planning meeting participants with the IC.
- Establish and post the location and time for the planning meeting.
- Ensure that planning maps and forms, are available:
  - Use large sketch maps or charts for planning and briefing.
  - Display the Planning Matrix (ICS Form-215, Appendix B). Conduct the Planning Meeting

The Planning Section Chief is responsible for conducting the planning meeting and ensuring that the flow of information is brief and to the point.

The Planning Section Chief should provide a briefing on the current situation and resource status. Information for this briefing may come from any or all of the following sources:

- Initial response IC
- Incident Briefing Form (ICS Form-201, Appendix B)
- Field observations
- Operations reporting
- Resource and situation reports

- Specify resources needed by Divisions-Groups:

  The OSC, after specifying tactics for each division or group, and in conjunction with the Planning Section Chief, determines resource needs by group to accomplish work assignments. Resource needs will be recorded on the Planning Matrix.

- Specify operations facilities and reporting facilities:

  - The OSC, in conjunction with the LSC and the Planning Section Chief, will specify any facility locations needed to accomplish the work assignments. These will normally be staging areas, shelters, and others.

- Place resource and personnel orders:

  - Using the Planning Matrix (ICS Form-215, Appendix B), it will be possible to determine how many of the resources required for the next operational period are already available at the incident or in route.
  - Match resource and personnel needs with those resources available for the operational period, the resources that must be ordered can be determined. With this new assessment, new resource orders can be put together and shown to the WWTA IC for his/her approval, and then ordered through normal dispatch channels by the Logistics Section.
  - Make sure that a system of confirming resource orders and their estimated time of arrival are established with logistics to complete the Division-Group Assignment Lists.

- Consider Communications, Medical, Safety, and Transportation Plan requirements:

  - The IAP are available in Appendix B.
  - The Planning Section Chief must determine the need for these attachments to any written IAP and ensure that the appropriate staff prepares them.

4. Finalize, Approve, and Implement IAP

- The Planning Section Chief is responsible for seeing that the IAP is complete and accurate. The following sequence of steps to accomplish this are as follows:

  - Set a time when IAP attachments are required to be completed.
  - Obtain plan attachments and review for completeness and approvals.
  - Obtain WWTA IC approval of complete plan package.
  - Prepare for operations shift briefing.

- This is a period of time in which the Planning Section Chief and staff finish last minute matters and prepare for the operations shift briefing:

  - Determine the number of IAPs required.
  - Arrange for Documentation Unit to reproduce plan.
  - Review IAP to ensure it is up-to-date and complete prior to the operation briefing and distribution of IAP.

- Select operations shift briefing location:

  - Find a space large enough to accommodate personnel.
  - Select quiet place.
  - Set up display map.

- Attend the operation shift briefing:

  - Hand out the IAP to all pertinent personnel.
  - Provide a brief on the incident as of current time and reference map.
  - Current weather report is read and explained.
  - The Planning Section Chief may finalize the briefing with any missing data and ask/answer questions.

- Finalize operational plans and prepare agency specific reports:

  - Document any changes to the IAP made during the briefing.
  - Revise Incident Status Summary (ICS Form-209) and prepare agency specific forms and reports.
  - Set up procedure to debrief operational personnel.
  - Revise resource status board to show current shift status.
  - Submit all forms, reports, plans, and miscellaneous written information to documentation Unit for filing.

To support the phases of the IAP development, the Planning P (U.S. Coast Guard Incident Management Handbook) shown in Figure 4.2 provides a visual representation of the Operational Planning Cycle. The Operational Planning Cycle is repeated for each Operational Period (or shift) of an incident and results in the IAP for that Operational Period.

As depicted in the Planning P, the Operational Period is divided into 11 distinct times, characterized by briefings, meetings, and working periods:

1. Incident Brief
2. Initial IC Meeting
3. Objectives Meeting
4. Staff Briefing
5. Preparing for the Tactics Meeting
6. Tactics Meeting
7. Preparing for the Planning Meeting
8. Planning Meeting
9. IAP Preparation and Approval
10. Operational Briefing
11. Execute Plan and Assess Progress

Each of these periods, including schedules, meeting descriptions, assignments, and other important information are characterized in ICS Position Guides provided in Appendix C.

4.5 Resourcing and Mutual Aid Agreements

As an emergency escalates, resources are available outside of the WWTA through mutual aid from county, state, and federal agencies, as needed and available. If available, internal and mutual aid resources should be used initially. As resources are exhausted, external support will be requested and provided through the Hamilton County Office of Emergency Management. In the event of an emergency where resources need to be shared, WWTA will loan or receive equipment from other utilities.

5.0 Crisis Communications Plan

5.1 Introduction and Purpose

During a crisis, clear and timely communication can save lives, property, and credibility. This Crisis Communications Plan outlines the roles, responsibilities, and steps for effective communication during a crisis.

The purposes of this Crisis Communications Plan are to:

- Identify the staff roles and responsibilities during a crisis.
- Outline clear direction for notifying stakeholders during an emergency
- Provide tools and key messages to use during a crisis to facilitate timely and accurate communication.

5.2 Administrative Staff Crisis Communication Team

The WWTA Administrative Staff is responsible for notifying and providing information to various stakeholders during the response and recovery phases of an emergency event.

The WWTA Administrative Staff consists of the following personnel:

- WWTA Executive Director
- Chief Engineer
- Deputy Director of Administration

5.2.1 Executive Director of the WWTA

During emergencies, the Executive Director is the primary person that communicates with the public. The Executive Director is responsible for the preparation and release of information to the news media regarding service interruption, impacts to the public, and actions taken by the utility to restore service. Coordination with other agency representatives regarding public notifications for restricted wastewater services may also be required.

External emergency response agencies will manage large emergencies. In these situations, the Executive Director is responsible for providing utility-specific information to the external agency Pubic Information Officer (PIOs).

Any or all media or public inquiries and/or contacts requesting information relative to the WWTA's internal and/or external operations are to be forwarded to the Executive Director. Appendix E provides further details on notification of external agencies. No other personnel are authorized to respond to media inquiries.

5.2.2 Crisis Communications Tools

The WWTA uses various tools for disseminating information to internal and external audiences, including:

- Temporary Signage
- Press releases, press conferences or briefings, and one-on-one calls to reporters
- Front door hangers
- WWTA web site
- Local radio station interview
- 911 Call Center
- Hamilton County Office of Emergency Management

5.2.3 Key Messages

Basic information regarding utility operations is collected in advance to facilitate rapid communication during an emergency event. Templates for more common types of emergencies, such as force main breaks, have been prepared in advance. Appendix D contains templates for a sanitary sewer overflow. Several key messages have been developed. These include messages that apply to the entire utility and community, regardless of the crisis. Themes or messages that might be appropriate for use during a crisis include:

- An explanation and/or apology (if appropriate) to the impacted parties
- A statement of responsibility for the event (if appropriate) or responsibility for follow-up after an event and a commitment to mitigate the impacts stemming from the event as soon as possible
- A commitment stating that the goal of the utility is that such a crisis never occurs again in the future

These themes can be crafted in advance but modified as needed when an actual crisis arises. It is important that these themes be discussed and endorsed by the entire Administrative Staff before an actual emergency.

5.3 Public Notification of Emergencies

Outside agencies will be notified based on the EAL and based on the criteria established in Appendix E. Notifications are made verbally through the E911 system through standard telephone communications. Notifications should not be unduly delayed or withheld due to lack of information.

5.3.1 Public Notification

In accordance with the CD requirements, the following components for public notification of emergencies have been established in coordination with public health authorities, as applicable, and are described as follows:

1) Criteria: The WWTA has established criteria that will be used for notifying the public, and other affected stakeholders, of an emergency caused by a SSO, prohibited bypass, or effluent limit violations. The criteria is described below and summarized in Appendix E.

2) Internal Contact List: An Internal Contact List that identifies names and phone numbers for WWTA staff who are responsible for conducting external and public notification is maintained and updated by the WWTA.

3) External Contact List: An External Contact List identifying names and phone numbers of public agencies that must be contacted during an emergency is provided in Appendix E.

4) Authorized Staff for Public Statements: Only the WWTA Executive Director, or his/her designee, is authorized to make public statements.

5.3.2 Notification of Regulatory Agencies

In accordance with the CD requirements, the following components for notifying regulatory authorities have been established in coordination with public health authorities, as applicable, and are described as follows:

1) Criteria: The WWTA has established criteria that will be used as the basis for immediately notifying regulatory authorizes, TDEC, and public health authorities of any emergency situation caused by an SSO, prohibited bypass, or effluent limit violations. The criteria is described below and summarized in Appendix E.

2) Internal Contact List: An Internal Contact List that identifies names and phone numbers for WWTA staff who are responsible for conducting external and public notification is maintained and updated by the WWTA.

3) External Contact List: A list identifying, by name and phone number, all officials who must be contacted is provided in Appendix E.

5.3.3 Notification of Fire Department and Law Enforcement

First responders or WWTA personnel that discover an emergency are responsible for evaluating the emergency and requesting assistance from the immediate supervisor, Wastewater Manager, Assistant Wastewater Manager, and/or Chief Engineer. Until the immediate supervisor, Wastewater Manager, Assistant Wastewater Manager, and/or Chief Engineer has arrived, the WWTA First Responder or personnel will take no further action. If the incident is considered to be a serious problem, the immediate supervisor, Wastewater Manager, Assistant Wastewater Manager, and/or Chief Engineer will contact the municipal department or Hazardous Materials Response Unit (HAZMAT) as deemed necessary.

In the event that a hazardous material has entered the sewer system or an explosive atmosphere is present in the WCTS, the Fire Department would be notified immediately and assume command and control. Security issues at the stations would initiate notification of the Police Department, who would assume control of the investigation.

The following information is to be provided to the outside response agencies regarding the incident:

- Facility name, address, location, and telephone number
- Name of person reporting the incident
- Date, time, and type of incident
- Is it a threat or actual event?
- Have water supply systems been interrupted or shutdown?
- Have wastewater systems been impacted or has there been a sewage spill?
- Is a water outage eminent?
- Toxic / hazardous material that was released or involved
- Quantity (if known) of hazardous material that was released
- During a hazardous material release that requires evacuation, identify the location where WWTA staff will meet the Fire Department

5.3.4 Notification of Public Health

The Hamilton County Public Health Department would be notified if an illness or public health issue were associated with WWTA's WCTS (in an emergency) (Appendix E).

5.3.5 Notification of State Regulatory Agencies of SSOs

The following subsections provide information on protocols for notification of TDEC, or other affected stakeholders, during the event of an SSO.

5.3.5.1 Collection System or Pump Station SSOs

When a SSO occurs, the WWTA staff would perform the appropriate notification procedures as specified in its NPDES permit. When a telephone call is received for an SSO, a Wastewater Clerk, from the Administrative Staff, will record the information in an email and send to the appropriate Technician.

<u>Types of Notification of SSO Events:</u>

- 24-Hour/Immediate Notification – The WWTA Executive Director or his/her designee will send TDEC an initial SSO report (within 24 hours of an SSO) via email, TDEC portal, or phone call. WWTA is also available to reply to any requests for additional information by TDEC.
- 5-Day Notification – The WWTA Executive Director or his/her designee will submit a 5-Day SSO report to TDEC for all SSOs. This report is submitted through the MyTDEC Forms System.

- Spills that occur in the State of Georgia would be reported to GAEPD per details summarized in Appendix E.

Reporting Information

Collection of essential information is necessary in order for proper reporting, and responding, during an incident. To facilitate accurate record keeping and reporting, a Wastewater Technician will collect and record the following information, and send, in an email, to the necessary Technician.

- Time and Date the call was received
- Specific location and description of SSO event
- The caller's name and phone number
- A statement detailing WWTA response activities

In the event that an SSO call is received by WWTA staff who are not within the Administrative Staff, the WWTA personnel receiving the call will collect the same information above.

There are five (5) reports and logs that are used to collect information relating to SSO events. These can be found in the Sewer Overflow Response Plan. The reports and logs include the following:

- Complaint Voicemail Log
- Complaint Call Emails (Examples)
- Sanitary Sewer Overflow Observation Report (Example)
- Spill Volume Estimating
- Possible SSO Locations Due to Pump Station Failure
- SSO Locations Occurring Multiple Times Within 12 Months (Example)
- 5-Day SSO Report to TDEC

5.3.6 Notification of Downstream Users

Depending on the severity of an SSO or chemical spill that affects a downstream user, the WWTA staff in coordination with the Hamilton County Public Health Department, would notify a downstream user. Criteria used to determine when a downstream user is notified include conditions evaluated such as river conditions, SSO volume and chemical spill volume and type (Appendix E).

Public and Local News Media: the WWTA Executive Director will determine the need for public notification. Notifying will be done through notices to news media for publication or airing, or

through direct notices to potentially impacted customers. All phone calls from the media received by WWTA personnel, concerning SSOs, are to be transferred to the WWTA Executive Director or his/her designee. Only the WWTA Executive Director or his/her designee is authorized for interviews by the public and local news media. A sample Press Release, shown in Appendix D, may be used to release statements to the public regarding SSO events.

5.3.7 County and State Emergency Management Agencies

When it has been determined that SSOs will affect or require assistance from the agencies below, the WWTA Executive Director, or his/her designee will contact the following agencies as necessary:

- Hamilton County Emergency Management Services
- Tennessee Emergency Management Agency
- TWRA
- Fire, Police, Ambulance (Emergency)

The IC from the County's Fire Department and /or the HCOEM will manage large-scale emergencies that require resources from County, State, and Federal agencies. The IC is responsible for notification of County, State and Federal Agencies (Appendix E).

The Hamilton County EMA will be notified by the Fire Department if the emergency requires elevated assistance. The Hamilton County EMA conducts planning for disaster preparedness. Command and control during response and recovery phases of disasters and large scale emergencies is maintained in the Emergency Operations Center.

The County EMA will notify TEMA. TEMA's mission is to coordinate emergency management response and recovery to reduce loss of life and property in the State of Tennessee. TEMA provides assistance by reaching out for mutual aid from other departments or agencies of the state, from local jurisdictions, from other states and from the federal government. TEMA manages the flow of materiel and special teams and services to the incident commander.

5.3.8 National Response Center Release Notification

In accordance with 40 CFR 302, the National Response Center (NRC) must be immediately notified for reporting all oil and hazardous material discharges into the environment in the United States and its territories. The WWTA Executive Director is responsible for completing this notification (Appendix E).

6.0 IRP Activation and Threat Characterization

6.1 Introduction

This section provides guidelines for IRP activation and characterizes threats to the WWTA WCTS. In addition, ways in which staff may learn about a threat, the threat decision process, and critical area vulnerability to threats are discussed below.

6.2 IRP Activation

6.2.1 Threat Warning

A "threat warning" is the initial occurrence or discovery that triggers an evaluation of whether or not to activate the WWTA IRP. A description of the possible threat warnings that the WWTA may encounter is provided below. If any of these conditions are met, then the WWTA Executive Director, or his/her designee, will issue a Threat Warning.

Security Breach. Physical securing breaches caused by relaxed operations, such as unsecured doors or criminal acts such as trespassing, are probably the most common threat warnings.

Witness Account. Employees or neighbors may see suspicious activity, such as trespassing, breaking and entering, and other types of tampering, that they report to local law enforcement or to Dispatch.

Notification by PIRPetrator. A threat may be made directly to the personnel, either verbally or in writing. Historical incidents would indicate that verbal threats made over the phone are more likely than written threats.

Notification by Law Enforcement. Personnel may receive notification about a threat directly from law enforcement. Such a threat could be a result of a report of suspicious activity or gathered by law enforcement intelligence.

Notification by News Media. A threat to damage or contaminate the WWTA WCTS might be delivered to the news media, or the media may discover a threat. Such threats should be immediately reported to the police, who would immediately contact the WWTA.

Unusual Sewage Characteristics. All unusual changes in wastewater characteristics (such as appearance, odor, oil sheen, visible emissions, and lower explosive limit [LEL] alarms) should be reported and investigated. Field staff and/or customers are normally the first to encounter any unusual characteristics. Threat warnings are evaluated in the context of typical activity and previous experiences for the wastewater system in order to avoid false alarms.

6.2.2 Threat Decision Process

The threat decision process begins once a threat warning is received. The threat decision process is considered in three successive stages: possible, credible, and confirmed. As the situation escalates through these three stages, actions that might be considered also change.

The following paragraphs describe the stages, actions that might be considered, and activation of the WWTA IRP.

Stage 1, Possible: Is the threat possible? If the wastewater system is faced with a threat, it should first evaluate the available information to determine if the threat is possible (i.e., could something have actually happened based on the warning and staff's knowledge of the facility?). If the threat is possible, some precautionary response actions are implemented.

Stage 2, Credible: Is the threat credible? There must be information or evidence to corroborate the threat in order for it to be considered credible. For example, the information source may be highly credible, operations staff may be reporting encounters with suspect wastewater, or there may be alarms or monitoring results that are unusual. At this stage, portions of the WWTA IRP may be activated, such as initiating internal and external notifications, sampling and analysis, or considering isolation of part of the system. At this point, staff members are not sure if a major event has occurred, but they are preparing to respond should the threat actually lead to a major event.

Stage 3, Confirmed: Has the major event been confirmed? Confirmation implies that definitive evidence and information has been collected to establish that the event has occurred. Some threats are obviously confirmed, such as structural damage to the wastewater assets in which case Stages 1 and 2 are omitted. Upon confirmation of the major event, the WWTA IRP should be fully implemented. The WWTA IRP contains APs (Section 8) that address specific major events.

APs are implemented immediately when a major event is confirmed.

Table 6.1 below identifies actions that should be taken by the WWTA staff during each of the three stages, as well as when to activate the WWTA IRP. The WWTA Executive Director holds responsibility for the threat decision process and implementation of the WWTA IRP.

Table 6.1
Three Stages of the Threat Decision Process

Decision Process Stage	Actions Taken	IRP Activation Level
Stage 1 Possible Threat	Evaluate available information Determine if threat is possible (Could something have actually happened?)	Implement precautionary response actions
Stage 2 Credible Threat	Determine that threat is credible by establishing corroborating information Highly credible source Staff reports of unusual wastewater Unusual alarms or monitoring results	Activate portions of IRP Initiate internal and external notifications Consider isolation of portion(s) of the system Initiate sampling and analysis Consider partial or full activation of the WWTA EOC
Stage 3 Confirmed Major Event	Confirm threat by verifying definitive evidence and information that establishes the major event Perform sampling and analysis	Fully implement WWTA IRP Immediately initiate appropriate APs Fully activate the WWTA EOC

In determining whether to activate the WWTA IRP, the WWTA Executive Director also consider what is going on in the rest of the community regarding threat levels or any large-scale events that may affect the WWTA WCTS. Examples of events that may necessitate partial or full activation of the WWTA IRP include the following:

- Overturned gasoline truck
- Plane crash
- Lower explosive limit (LEL) alarm or through gas detection equipment at pump stations or in a manhole
- Notification from the Federal Bureau of Investigation (FBI) that there is a known threat that may occur
- Operations/operators see suspicious activity on site
- Change in local or national threat levels

6.2.3 Facility Access

The WWTA WCTS Operations are staged out of the East Ridge Screw Lift Pump Station facility, which is secured by a perimeter fence and security cameras. There is one gate used for entry into the facility site. The gate is open during normal business hours on Monday through Friday; the gate is closed at all other times. Personnel are screened for entry during non-business hours. Personnel are required to wear identification badges to enter the facility and in an

emergency response operation, law enforcement would recognize these badges for entry to and from a secured zone.

6.2.3.1 Stage 2 Credible Threat

When a Stage 2 Credible Threat occurs, the Executive Director, or his/her designee, shall order the following depending on the nature of the threat:

- Access to the WWTA facilities is limited to WWTA staff and emergency personnel, e.g., police department only.
- WWTA personnel are contacted by telephone and directed to remain in place.

6.2.3.2 Stage 3 Confirmed Major Event

When a Stage 3 Confirmed Major Event occurs, the Executive Director, or his/her designee, orders the following depending on the nature of the threat:

- Access to the WWTA WWTP is limited to WWTA staff and emergency personnel, e.g., police department only.
- Offsite WWTA personnel are contacted by telephone and directed to remain offsite.

6.2.4 Emergency Operations Centers

6.2.4.1 WWTA Emergency Operations Center

An EOC is a pre-designated facility that can act as a command center to coordinate WWTA's overall response and support to an emergency. WWTA staff will use the conference room at the Development Resource Center (DRC) as the EOC.

During an emergency, the EOC and its personnel will perform specific activities as follows:

- Establish an EOC Director to manage the emergency response.
- Set priorities and develop/execute APs.
- Coordinate and support all field-level incident activities within the WWTA service area.
- Gather, process, and report information within the WWTA service area and to other involved agencies regarding the magnitude and potential impact of the event on the community, as well as information on specific damages and planned response and recovery actions.
- Coordinate with local government, operational areas, or regional EOCs, as appropriate.
- Request resources from internal and external sources.
- Provide food, water and other emergency supplies for wastewater systems operators who are not able to leave their posts during an emergency.

The EOC Director will be either the WWTA Executive Director, or their designee, as warranted by the situation.

Conditions under which the WWTA EOC will be activated are unique for each emergency. As part of the WWTA's emergency response training program, staff members should be made aware of the different types of events that would trigger activation of the EOC, including activation by an agency outside of the WWTA. The IC will establish procedures regarding whom will staff the EOC, how staff will be notified to report to the EOC, how long individual shifts will be, who will be allowed to access the EOC, and the level of security that will be assigned to the EOC during an emergency.

6.2.4.2 County and State Government EOCs

Many state and local governments have an Emergency Operations Plan (EOP), or a similar emergency management program, which is implemented any time a major incident occurs within their jurisdiction. The EOP includes response activities such as initial damage assessment, emergency and short-term medical care, and the return of vital life-support systems (water, shelter, etc.) to minimum standards.

When a local government agency receives information about a potential emergency or disaster, it will conduct an initial assessment, determine the need to alert others, and set in motion the appropriate actions to reduce risk and potential impacts. Emergency response activities will be conducted as described in agency policies, procedures, and instructions. The activities may involve activating the HCOEM EOC or TEMA SEOC for coordination and support.

In the event that the HCOEM EOC or TEMA SEOC is activated, the WWTA Executive Director and other WWTA staff may be called upon to staff the HCOEM EOC and/or TEMA SEOC as agency representatives. Depending on the nature of the emergency, the WWTA Executive Director may choose to activate the WWTA EOC and provide staff for the HCOEM EOC/TEMA SEOC at the same time. Additionally, if an emergency originates within the WWTA WCTS, or WWTA staff members are the first to discover the situation, the WWTA Executive Director may make a recommendation to activate the HCOEM/TEMA EOC to assist WWTA staff with the response and provide additional resources.

The HCOEM Basic Emergency Operations Plan (BEOP, 2009) designates municipal water and wastewater systems as Emergency Support Function (ESF) 3, Subfunction 3.4. WWTA's

responsibilities as an ESF 3 are listed in the BEOP under ESF 3, Infrastructure, Subfunction 3.4, Water and Wastewater Systems. The WWTA, as requested, is responsible for providing an Emergency Services Coordinator to the HCOEM EOC in an emergency.

HCOEM EOC Locations

Primary EOC

The primary EOC is located in the 9-1-1 Communications Center at 3300A Amnicola Highway, Chattanooga, Tennessee.

Alternate EOC

The alternate EOC is located in the basement of the county jail at 601 Walnut Street, across from the county courthouse.

TEMA SEOC Location

3041 Sidco Drive
Nashville, TN 37204

6.3 Threat Characterization

6.3.1 Threats to the WWTA WCTS

Threats to a wastewater system are broadly classified into natural and man-made or malevolent threats. Man-made threats include physical destruction, bio-terrorism, chemical contamination, and cyber attack. Wastewater infrastructure, while possible targets of purposeful attack, also serves as a conduit for access to other targets. Large gravity sanitary are accessible through manholes and inlets and provide a means of undetected passage under streets to attack both “soft” and “hardened” targets. Large and small pipes can also be made into weapons through the introduction of highly flammable substances such as gasoline through a manhole or through building and residential drains and clean-outs. Explosions in the sewer can cause collapse of roads, sidewalks, and adjacent structures and cause injury and death in the vicinity.

The threat from terrorism that could potentially have an impact on collection system is important to consider. Any toxic substance added to the sewer system would need to be in high concentrations or large volumes to have an impact to the system. In the event of an attack on the WWTA WCTS by terrorists or others, personnel would immediately call 911 for assistance.

In addition, purposeful contamination of wastewater treatment or conveyance systems can lead to widespread and long-term environmental damage and severe public health impacts.

Remote and unattended wastewater pump stations have increased vulnerability. A remote telemetry system, also known as SCADA, is in place to monitor pump station parameters. The SCADA system uses a Motorola system with no access to the internet. The system is not set up for control of stations, only monitoring; therefore, it is highly unlikely that a cyber attack could occur or cause damage or an overflow.

Threat evaluation steps would be undertaken to determine if a threat to the wastewater system is credible. Strengthening the system and enhanced security are crucial in reducing risk.

Types of malevolent threats that may affect WWTA WCTS wastewater assets include:

- Vandalism
- Theft (including manhole cover theft)
- Arson
- Detonating or hiding an improvised explosive device (IED) in manholes, pump stations, and inlets
- Introduction of chemical, biological, and radiological (CBR) into the collection system
- Introduction of a flammable liquid into the sewer system
- Opening valves or turning off pumps to cause overflows and discharges
- Assault with or without a weapon
- Using sewer for transporting flammable substances or an IED with intent to destroy other property
- Release of toxic substance
- Using large diameter pipe as a tunnel for personnel access

Natural threats: According to the HCOEM Natural Hazards Mitigation Plan4, "a review of past natural disasters in Hamilton County, and across the State of Tennessee highlights thirteen hazards as presenting a significant potential risk to the communities of Hamilton County. These hazards include flood, winter storms, thunderstorms and associated hail, lightning, tornado, and high wind, as well as landslide and erosion, earthquake, drought, and wildfire."

Significant natural threats identified for the WWTA WCTS include flooding from heavy rain; tornadoes (includes high winds); severe weather such as thunderstorms, lightning, and ice and snowstorms; and earthquakes. These events may cause structural damage to facilities and interrupt processes that may result in environmental damage and public health concerns, such as sewer overflows.

Unintentional threats that may affect system assets include vehicular collisions, train derailments, industrial accidents, and contractors working on adjacent utility lines. Contractor activities are the most common unintentional threat.

6.3.2 Critical Area Vulnerability to Threats

Critical areas identified for the WCTS include the collection system and pump stations. Appendix F provides a list of pump stations (contained within the Pump Station and Power Loss SOP).

Significant hazards that the system is vulnerable to include the following:

- Floods – The WCTS system is located on or near tributaries to the Tennessee River. Extreme rainfall events occur in this region. Planning for a maximum probable flood in the area is of high importance in coordination with HCOEM.
- Widespread electrical failure – Ice storms, tornadoes, earthquakes, high wind, and floods can occur in this region resulting in widespread electrical failure.
- Tornadoes – The WWTA WCTS system could potentially be impacted by tornadoes in the future.
- Earthquakes – An earthquake has the potential to impact the WWTA system.

There is no known history of malevolent or terrorist threats to the WWTA's system. A history of natural hazards is provided in the HCOEM *Natural Hazards Mitigation Plan* which analyzes hazards for the area and discusses mitigation planning for potential disasters.

7.0 Emergency Response, Recovery, and Termination

7.1 Introduction

There are three different phases to an emergency response to an incident. These phases are:

1) response, 2) recovery, and 3) termination. The following sections provide general guidelines (relative to the response, recovery, and termination phases) that can be applied to most, if not all emergencies. APs that describe the response to a specific threat are contained in Section 8 of this document.

7.2 Personnel Safety

Protecting the health and safety of WWTA personnel as well as the surrounding community is a key priority during normal operations and during an emergency response.

Safety incidents include those related to confined spaces, excavation and trenching, scaffolding, ladders, vehicle usage, falls, chemical handling, machinery operation, electrical safety, and others.

A "First Report of Occupational Injury/Illness/Hazard" Form is required to be completed for such incidents within 24 hours after the occurrence. This form is maintained at the WWTA Headquarters at the Development Resource Center. The report is signed by the employee's supervisor and forwarded to the Occupational Safety Specialist for follow-up action. This report is also reviewed and signed by the Director as soon as practical. The WWTA maintains personal protective equipment (PPE) for safely handling chemicals.

7.3 Response Phase

Response is the actual provision of emergency services during a crisis. These activities are intended to reduce injuries, ensure employee safety, minimize facility damage, and facilitate recovery. Response activities include warning, isolating and controlling the problem, assessing damage, establishing temporary service, and other similar operations.

7.4 Initial Response

When a situation occurs that is judged to be of an emergency, "out of the ordinary", or suspicious nature, the person who first notices the situation will determine if an immediate response by police, fire, or emergency medical services is necessary. If so, the individual will immediately call 911 to report the incident.

The following information is to be provided to the outside response agencies regarding the incident:

- Facility name, address, location, and telephone number
- Name of person reporting the incident
- Date, time, and type of incident
- Is it a threat or actual event?
- Have water supply systems been interrupted or shutdown?
- Have wastewater systems been affected or has there been a sewage spill?
- Toxic / hazardous material that was released or involved
- Quantity (if known) of hazardous material that was released
- During a hazardous material release that requires evacuation, identify the location where WWTA staff will rendezvous with the Fire Department

The individual that discovered the incident will report to their supervisor. The supervisor and employee that discovered the incident will notify the WWTA Executive Director of the incident, as soon as practical. Additionally, the supervisor and employee that discovered the incident will remain in a safe location in the vicinity to meet and assist medical, fire, police, and other first responders.

7.5 Damage Assessment

Damage assessment is used to determine the extent of damage, estimate repair or replacement costs, and identify the resources needed to return the damaged system to full operation. This assessment is accomplished during the emergency response phase of the event, before the recovery phase is implemented.

The Executive Director of the WWTA is the individual who is responsible for establishing and managing the DATs. Each DAT will be composed of three to four personnel such as an operation or maintenance supervisor, electrician, engineer, and procurement specialist. Team composition may vary depending upon the nature and extent of the emergency.

DATs will be deployed to affected sites to perform site surveys. The DAT will first conduct a safety inspection to ensure the site remains a safe working environment. Once determined safe, the damage assessment can begin.

Damage assessment procedures follow the guidelines established for system operability checks and determination of operability/serviceability. At a minimum, the DAT completes the following activities:

- Conduct an initial analysis of the extent of damage to the system or station.
- Estimate the repairs to restore the system or asset; the estimate will consider supplies, equipment, rental of specialized equipment (for example, cranes), and additional staffing needs.
- Provide this estimate to the procurement representative to prepare a cost estimate to conduct repairs.

7.6 Recovery Phase

The recovery phase occurs after emergency response actions are complete. Recovery is intended to return the affected asset or area to normal operations. The recovery phase is an opportune time to institute mitigation measures, particularly those related to the recent emergency. Examples of recovery actions include completing repairs, replacing heavily damaged equipment, and reviewing emergency response actions.

Proper documentation for FEMA is critical for reimbursement; therefore, Hamilton County WWTA has established clear guidelines and procedures for purchasing, procurement, and invoicing.

7.7 Recovery Organization

During emergency response operations, the Executive Director of the WWTA will appoint a Recovery Manager. The Recovery Manager is responsible for selecting a recovery team and developing a recovery strategy prior to emergency termination.

The Recovery Manager is a senior operations representative familiar with the systems that may be affected by the emergency. The Recovery Manager has the responsibility and authority to coordinate recovery planning and activities; protect the health and safety of workers and the public; and initiate, change, or recommend protective actions. Additional responsibilities include:

- Facilitate the transition from emergency to recovery operations
- Develop, implement, and maintain the Recovery Plan
- Coordinate all vendor and contractor activities onsite
- Ensure that the appropriate safety inspections have been completed
- Coordinate the completion of emergency repairs and schedule permanent repairs
- Notify key agencies of emergency repair status and the scheduled completion of system repairs
- Complete permanent repair and/or replacement of system facilities

- Review press releases prior to distribution
- Release repaired facilities and equipment for normal use
- Replace, or authorize the replacement of, materials and supplied used in the emergency
- Document all recovery activities

The Recovery Manager determines the expertise and selects personnel necessary for the recovery organization. In general, the composition of the recovery organization is based on the nature and extent of the emergency and includes:

- Technical advisors to the Recovery Manager, which may include external resources such as industrial hygienists or fire protection specialists

- WWTA personnel with the technical expertise to direct post-incident assessment activities and to analyze the results. Maintenance, operations, and engineering staff would be expected to fill these positions.

The WWTA PIO will address inquiries or concerns from employees, the public, the news media, and outside agencies. The WWTA PIO should be prepared to provide information regarding the results of the incident investigation, the extent of onsite and offsite impacts, and the status of recovery operations. The WWTA PIO conducts all media releases and other public communications (Section 5).

7.8 Prepare Recovery Plan

The purpose of the Recovery Plan is to define the steps required to restore the system to normal operations. The initial outline of the Recovery Plan is developed during the emergency response phase. However, the plan is not implemented until the emergency response phase is concluded and the Executive Director of the WWTA approves the plan. Recovery planning must also be coordinated with the appropriate external regulatory and response agencies. The plan will describe the recovery management team, plan of action, and proposed completion schedule for restoring services.

7.9 Implement Recovery Plan

Once the emergency response phase is concluded, the Recovery Plan can be implemented. The following are examples of activities that might be executed by the recovery team:

- Install warning signs and barriers.
- Begin repairs activities, including preparing designs and bids for contractor's services.
- Execute agreements with vendors for equipment, materials, and services.
- Remove and dispose of debris.
- Collect cost account information needed for insurance claims and for submittal of a request for Emergency Disaster Funds.
- Obtain inspections and/or certifications that may be required before facilities can be returned to service.
- If necessary, initiate the incident investigation procedure described in this section below.

7.10 Termination Phase

The Recovery Manager will officially terminate the recovery phase when normal operations are resumed at all facilities affected by the emergency. Upon terminating the recovery phase, personnel perform the following activities:

- Debrief staff and document lessons learned. Update training programs, the WWTA IRP, and SOPs, as needed, based upon "lessons learned" during the emergency response and recovery phases of the event.

- Identify operational changes that have occurred because of repair, restoration, or incident investigation.
- Document the recovery phase and compile applicable records for permanent storage.

7.11 Incident Investigation

The purpose of the incident investigation is to identify the underlying causes of an incident and to implement corrective actions that would prevent the incident from reoccurring. This process can also be used to investigate chemical incidents and other incidents affect the WWTA. The following steps describe the incident investigation process.

7.11.1 Initiate Investigation

After an incident, WWTA will initiate an incident investigation, if applicable. Once the fire department or other applicable authority notifies the Administrator of Public Works that it is safe for WWTA personnel to return to a facility or asset, the Executive Director of the WWTA will initiate the investigation within 48 hours.

7.11.2 Investigation Team

The Executive Director of the WWTA (or their designee) establishes an incident investigation team to investigate the incident. In addition, contract employees are included as part of the incident investigation team whenever the incident involves the work of the contractor. Other individuals with appropriate knowledge may participate, if required, to investigate an incident (e.g., other employees, engineer, equipment supplier, vendor, or consultant).

7.11.3 Survey the Scene

The incident investigation team will first consult with the emergency responders to determine if the incident has been stabilized and verify that any remaining danger has been alleviated. Once the emergency responders assess the scene for danger and determine that the incident has been safely mitigated, the incident investigation team will survey the scene and determine the following:

- Who was injured?
- What caused the accident?
- What property was damaged?
- What systems or operations were affected?
- What mitigation actions were completed and when?

7.11.4 Secure the Scene

The incident investigation team will secure the incident scene in order to preserve evidence. Any items (e.g., damaged equipment and spill samples) that might help to explain what happened should be left untouched.

7.11.5 Investigation Report

During the initial survey of the scene, the incident investigation team will fill in pertinent information on the Incident Investigation Report Form. This form, along with instructions for completing selected sections, is contained in Appendix G. The report consists of the following sections:

- Report cover
- Witness identification
- Witness account
- Witness certification
- Incident description
- Safety recommendations
- Conclusions
- Investigation team certification
- Additional instructions

7.11.6 Witness Identification

The incident investigation team identifies witnesses to the incident. Each witness is asked not to discuss the accident with anyone until the incident investigation team interviews him or her. The identity of all witnesses is recorded on the Incident Investigation Report (Appendix G).

7.11.7 Collect Witness Accounts

Each witness is asked to prepare a written account of what she or he experienced immediately. Witnesses should use copies of Section 3 of the Incident Investigation Report Form to prepare an account of their experience.

7.11.8 Collect and Preserve Evidence

Coordinate with and defer to police and/or fire investigators before collecting evidence. Disturbing the scene of a police or fire investigation may be a criminal offense. The incident investigation team will photograph and / or videotape the area based upon the nature of the incident and the requirements of outside investigation agencies. For example, this includes the hazardous material release initiation point and the entire affected area. The date and time must be noted on all photographs.

The incident investigation team collects evidence that may have contributed to the cause of the accident and that may be subject to change (e.g., dust, etc.) and document where the evidence was found. Then they record (e.g., photograph and take notes) relative locations of people, parts, and materials (i.e., note the positions of valves, switches, and any controls). If appropriate, the incident investigation team verifies fire-extinguishing equipment to see if it has been activated. Finally, they collect any written documents that may aid the investigation, such as written instructions, container labels, operator logs, and training records.

7.11.9 Interview Witnesses

The incident investigation team records statements from operators, persons near the accident, witnesses, and emergency response personnel. Questions may relate to the events leading up to the accident including time of day, weather conditions, what happened, why it happened, and any suggestive corrective actions that should be taken to prevent reoccurrence. The date and time of all interviews must be recorded in interview notes.

7.11.10 Incident Analysis

After completing initial interviews, the incident investigation team reviews and analyzes all evidence to determine the root causes of the incident. During this incident analysis phase of the investigation, the team should have sufficient information to complete Section 5 of the Incident Investigation Report Form.

7.11.11 Evaluate and Resolve Safety Recommendations

Following the incident analysis phase (and completion of Section 5 of the Incident Investigation Report Form), the incident investigation team should summarize safety recommendations resulting from the investigation. The Executive Director of the WWTA then assigns safety recommendations to the appropriate staff (e.g., operations, maintenance, or engineering personnel) for prompt follow-up.

Safety recommendations often require additional evaluation to determine if they are technically and economically feasible; therefore, list the target evaluation date, resolution, and resolution date for each recommendation. Section 6 of the Incident Investigation Report Form will be used to track assignments and resolutions. It is the responsibility of the Executive Director of the WWTA to ensure that all safety recommendations are properly resolved and documented in the incident investigation report. Whenever a safety recommendation is not implemented, a written explanation of its exclusion is documented. The incident investigation report is not considered complete until all safety recommendations are resolved and documented.

7.11.12 Certify Report

After documenting the resolution to safety recommendations, the incident investigation will be considered complete. Following completion of the incident investigation, the incident investigation team will sign the incident investigation report certification (Section 8 of the Incident Investigation Report Form), certifying that they have reviewed and agree with the conclusions of the incident investigation report.

7.12 Management and Record Keeping

The Executive Director of the WWTA has overall responsibility for implementing this procedure and documenting incident investigations. The Executive Director of the WWTA retains all

certified incident investigation reports and attendance sheets for those informed of investigation results. Each incident involving a chemical that is regulated under 40 CFR 68 must be added to the WWTA 5-year accident history if it resulted in deaths, injuries, or significant property damage on-site, or known off-site deaths, injuries, evacuations, sheltering-in-place, property damage, or environmental damage.

8.0 Standard Operating Procedures

8.1 SSOs

The WWTA maintains a Sanitary Sewer Overflow Response Plan (SORP, 2024). The purpose of the plan and procedure is to ensure timely and effective methods of response to SSOs and to minimize adverse impacts to public health and the environment.

Notification and reporting procedures for local, state, federal agencies, and investigative procedures for SSOs are documented in the SORP (2024). The SORP provides a plan for the WWTA receive, communicate, and act accordingly to prevent, repair, or respond to any incident relating to a SSO.

Notification and reporting procedures for local, state, and federal agencies and investigative procedures for SSOs are provided in the SORP (2024). The SORP provides a strategy for WWTA to mobilize labor, materials, tools, and equipment to correct or repair and mitigate any condition that may cause or contribute to the following:

- An unpermitted discharge (i.e., to surface waters)
- SSOs that are successfully contained and present no threat to jurisdictional waters of the U.S.

WWTA tracks monthly SSO data information in Microsoft Excel.

8.1.1 Chemical Spills in the Collection System

SSOs involving hazardous substances, although rare, do have the potential to occur. Incidents involving such substances typically occur near industrial or commercial sites of the WCTS system. In the event of a chemical spill, the First Responder to arrive on the scene will investigate and notify the immediate supervisor, manager, or Chief Engineer. The immediate supervisor, manager, or Chief Engineer will arrive to investigate and determine the necessity of calling the local Fire Department or HAZMAT team. Upon the arrival of the HAZMAT team, the First Responder or staff member will support the HAZMAT team as directed. Once the HAZMAT team clears the area, the First Responder or staff member will assist, as required, with site cleanup and SSO reporting requirements. HazMat responders can also provide direction on what PPE wastewater personnel should wear by to perform critical tasks.

8.1.2 Severe Weather Events

Severe weather can cause potential harm to WWTA operations and include thunderstorms, tornadoes, tropical storms, high rainfall, flooding, and snow and ice storms. If there is no immediate danger to personnel, employees carefully monitor the pump stations. If lightning is

occurring in the vicinity, employees are instructed to remain inside buildings and protected areas.

Severe weather events may result in WWTA management ordering system-wide evacuation or shelter-in-place. During severe weather events, instructions from the HCOEM are followed.

8.1.3 Fires at Stations within the Service Area

Any fire at WCTS facilities would result in immediate evacuation of all personnel from the area of the fire and notification of the appropriate City Fire Department through the 911 call center. The appropriate Fire Department handles all fires. Fire extinguishers are inspected, tested, and maintained under the direction of the Occupational Safety Specialist at all applicable facilities.

Appendix A - Schedule for Implementation

Incident Response Plan
Schedule for Implementation

IRP Element	Anticipated Date of Implementation
WWTA Final IRP adoption	Final USEPA approval of WWTA IRP
Review of IRP and update of SOPs	Annual
Baseline NIMS and ICS Concepts ICS-100.PWB: Introduction to Incident Command System for Public Works IS-700: Introduction to NIMS	September 2025 Key WWTA Staff
ICS-200: ICS for Single Resources and Initial Action Incidents IS-800: A NRF, an Introduction IS-821: CIKR Support Annex FEMA ICS-300: Intermediate ICS for Expanding Incidents FEMA ICS-400: Advanced ICS	September 2025 Key WWTA Staff

Appendix B – ICS Forms

INCIDENT BRIEFING (ICS 201)

1. Incident Name:	2. Incident Number:	3. Date/Time Initiated: Date: Time:

4. Map/Sketch (include sketch, showing the total area of operations, the incident site/area, impacted and threatened areas, overflight results, trajectories, impacted shorelines, or other graphics depicting situational status and resource assignment)**:**

5. Situation Summary and Health and Safety Briefing (for briefings or transfer of command)**:** Recognize potential incident Health and Safety Hazards and develop necessary measures (remove hazard, provide personal protective equipment, warn people of the hazard) to protect responders from those hazards.

6. Prepared by: Name: _____ Position/Title: _____ Signature: _____

Date/Time: _____

INCIDENT BRIEFING (ICS 201)

1. Incident Name:	2. Incident Number:	3. Date/Time Initiated: Date: Time:

7. Current and Planned Objectives:

8. Current and Planned Actions, Strategies, and Tactics:

Time:	Actions:

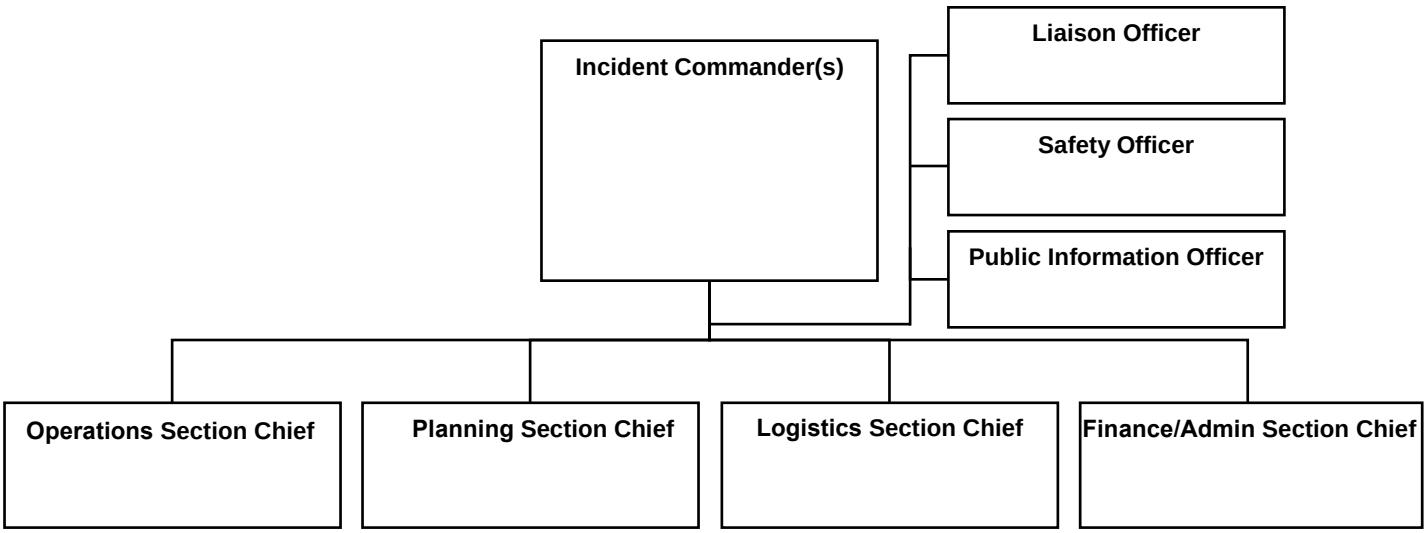
6. Prepared by: Name: _____ Position/Title: _____ Signature: _____

 Date/Time: _____

INCIDENT BRIEFING (ICS 201)

1. Incident Name:	2. Incident Number:	3. Date/Time Initiated: Date: Time:

9. Current Organization (fill in additional organization as appropriate)**:**



6. Prepared by: Name: _____ Position/Title: _____ Signature: _____

Date/Time: _____

INCIDENT BRIEFING (ICS 201)

1. Incident Name:	2. Incident Number:	3. Date/Time Initiated: Date: Time:

10. Resource Summary:

Resource	Resource Identifier	Date/Time Ordered	ETA	Arrived	Notes (location/assignment/status)
				☐	
				☐	
				☐	
				☐	
				☐	
				☐	
				☐	
				☐	
				☐	
				☐	
				☐	
				☐	
				☐	
				☐	
				☐	
				☐	
				☐	
				☐	

6. Prepared by: Name: _____ Position/Title: _____ Signature: _____

Date/Time: _____

ICS 201
Incident Briefing

Purpose. The Incident Briefing (ICS 201) provides the Incident Commander (and the Command and General Staffs) with basic information regarding the incident situation and the resources allocated to the incident. In addition to a briefing document, the ICS 201 also serves as an initial action worksheet. It serves as a permanent record of the initial response to the incident.

Preparation. The briefing form is prepared by the Incident Commander for presentation to the incoming Incident Commander along with a more detailed oral briefing.

Distribution. Ideally, the ICS 201 is duplicated and distributed before the initial briefing of the Command and General Staffs or other responders as appropriate. The "Map/Sketch" and "Current and Planned Actions, Strategies, and Tactics" sections (pages 1–2) of the briefing form are given to the Situation Unit, while the "Current Organization" and "Resource Summary" sections (pages 3–4) are given to the Resources Unit.

Notes:

- The ICS 201 can serve as part of the initial Incident Action Plan (IAP).
- If additional pages are needed for any form page, use a blank ICS 201 and repaginate as needed.

Block Number	Block Title	Instructions
1	**Incident Name**	Enter the name assigned to the incident.
2	**Incident Number**	Enter the number assigned to the incident.
3	**Date/Time Initiated** • Date, Time	Enter date initiated (month/day/year) and time initiated (using the 24-hour clock).
4	**Map/Sketch** (include sketch, showing the total area of operations, the incident site/area, impacted and threatened areas, overflight results, trajectories, impacted shorelines, or other graphics depicting situational status and resource assignment)	Show perimeter and other graphics depicting situational status, resource assignments, incident facilities, and other special information on a map/sketch or with attached maps. Utilize commonly accepted ICS map symbology. If specific geospatial reference points are needed about the incident's location or area outside the ICS organization at the incident, that information should be submitted on the Incident Status Summary (ICS 209). North should be at the top of page unless noted otherwise.
5	**Situation Summary and Health and Safety Briefing (**for briefings or transfer of command): Recognize potential incident Health and Safety Hazards and develop necessary measures (remove hazard, provide personal protective equipment, warn people of the hazard) to protect responders from those hazards.	Self-explanatory.
6	**Prepared by** • Name • Position/Title • Signature • Date/Time	Enter the name, ICS position/title, and signature of the person preparing the form. Enter date (month/day/year) and time prepared (24-hour clock).
7	**Current and Planned Objectives**	Enter the objectives used on the incident and note any specific problem areas.

Block Number	Block Title	Instructions
8	**Current and Planned Actions, Strategies, and Tactics** • Time • Actions	Enter the current and planned actions, strategies, and tactics and time they may or did occur to attain the objectives. If additional pages are needed, use a blank sheet or another ICS 201 (Page 2), and adjust page numbers accordingly.
9	**Current Organization** (fill in additional organization as appropriate) • Incident Commander(s) • Liaison Officer • Safety Officer • Public Information Officer • Planning Section Chief • Operations Section Chief • Finance/Administration Section Chief • Logistics Section Chief	• Enter on the organization chart the names of the individuals assigned to each position. • Modify the chart as necessary, and add any lines/spaces needed for Command Staff Assistants, Agency Representatives, and the organization of each of the General Staff Sections. • If Unified Command is being used, split the Incident Commander box. • Indicate agency for each of the Incident Commanders listed if Unified Command is being used.
10	**Resource Summary**	Enter the following information about the resources allocated to the incident. If additional pages are needed, use a blank sheet or another ICS 201 (Page 4), and adjust page numbers accordingly.
	• Resource	Enter the number and appropriate category, kind, or type of resource ordered.
	• Resource Identifier	Enter the relevant agency designator and/or resource designator (if any).
	• Date/Time Ordered	Enter the date (month/day/year) and time (24-hour clock) the resource was ordered.
	• ETA	Enter the estimated time of arrival (ETA) to the incident (use 24-hour clock).
	• Arrived	Enter an “X” or a checkmark upon arrival to the incident.
	• Notes (location/ assignment/status)	Enter notes such as the assigned location of the resource and/or the actual assignment and status.

INCIDENT OBJECTIVES (ICS 202)

1. Incident Name:	**2. Operational Period:** Date From: Date To: Time From: Time To:

3. Objective(s):

4. Operational Period Command Emphasis:

General Situational Awareness

5. Site Safety Plan Required? Yes ☐ No ☐

Approved Site Safety Plan(s) Located at:

6. Incident Action Plan (the items checked below are included in this Incident Action Plan)**:**

☐ ICS 203	☐ ICS 207	Other Attachments:
☐ ICS 204	☐ ICS 208	☐ _____
☐ ICS 205	☐ Map/Chart	☐ _____
☐ ICS 205A	☐ Weather Forecast/Tides/Currents	☐ _____
☐ ICS 206		☐ _____

7. Prepared by: Name: Position/Title: _____ Signature: _____

8. Approved by Incident Commander: Name: _____ Signature: _____

ICS 202	**IAP Page** _____	Date/Time: _____

ICS 202
Incident Objectives

Purpose. The Incident Objectives (ICS 202) describes the basic incident strategy, incident objectives, command emphasis/priorities, and safety considerations for use during the next operational period.

Preparation. The ICS 202 is completed by the Planning Section following each Command and General Staff meeting conducted to prepare the Incident Action Plan (IAP). In case of a Unified Command, one Incident Commander (IC) may approve the ICS 202. If additional IC signatures are used, attach a blank page.

Distribution. The ICS 202 may be reproduced with the IAP and may be part of the IAP and given to all supervisory personnel at the Section, Branch, Division/Group, and Unit levels. All completed original forms must be given to the Documentation Unit.

Notes:

- The ICS 202 is part of the IAP and can be used as the opening or cover page.
- If additional pages are needed, use a blank ICS 202 and repaginate as needed.

Block	Block Title	Instructions
1	**Incident Name**	Enter the name assigned to the incident. If needed, an incident number can be added.
2	**Operational Period** • Date and Time From • Date and Time To	Enter the start date (month/day/year) and time (using the 24-hour clock) and end date and time for the operational period to which the form applies.
3	**Objective(s)**	Enter clear, concise statements of the objectives for managing the response. Ideally, these objectives will be listed in priority order. These objectives are for the incident response for this operational period as well as for the duration of the incident. Include alternative and/or specific tactical objectives as applicable. Objectives should follow the SMART model or a similar approach: **S**pecific – Is the wording precise and unambiguous? **M**easurable – How will achievements be measured? **A**ction-oriented – Is an action verb used to describe expected accomplishments? **R**ealistic – Is the outcome achievable with given available resources? **T**ime-sensitive – What is the timeframe?
4	**Operational Period Command Emphasis**	Enter command emphasis for the operational period, which may include tactical priorities or a general weather forecast for the operational period. It may be a sequence of events or order of events to address. This is not a narrative on the objectives, but a discussion about where to place emphasis if there are needs to prioritize based on the Incident Commander's or Unified Command's direction. Examples: Be aware of falling debris, secondary explosions, etc.
	General Situational Awareness	General situational awareness may include a weather forecast, incident conditions, and/or a general safety message. If a safety message is included here, it should be reviewed by the Safety Officer to ensure it is in alignment with the Safety Message/Plan (ICS 208).
5	**Site Safety Plan Required?** Yes ☐ No ☐	Safety Officer should check whether or not a site safety plan is required for this incident.
	Approved Site Safety Plan(s) Located At	Enter the location of the approved Site Safety Plan(s).

Block Number	Block Title	Instructions
6	**Incident Action Plan** (the items checked below are included in this Incident Action Plan): ☐ ICS 203 ☐ ICS 204 ☐ ICS 205 ☐ ICS 205A ☐ ICS 206 ☐ ICS 207 ☐ ICS 208 ☐ Map/Chart ☐ Weather Forecast/ Tides/Currents Other Attachments:	Check appropriate forms and list other relevant documents that are included in the IAP. ☐ ICS 203 – Organization Assignment List ☐ ICS 204 – Assignment List ☐ ICS 205 – Incident Radio Communications Plan ☐ ICS 205A – Communications List ☐ ICS 206 – Medical Plan ☐ ICS 207 – Incident Organization Chart ☐ ICS 208 – Safety Message/Plan
7	**Prepared by** • Name • Position/Title • Signature	Enter the name, ICS position, and signature of the person preparing the form. Enter date (month/day/year) and time prepared (24-hour clock).
8	**Approved by Incident Commander** • Name • Signature • Date/Time	In the case of a Unified Command, one IC may approve the ICS 202. If additional IC signatures are used, attach a blank page.

ORGANIZATION ASSIGNMENT LIST (ICS 203)

1. Incident Name:	2. Operational Period: Date From: Date To: Time From: Time To:

3. Incident Commander(s) and Command Staff:	
IC/UCs	
Deputy	
Safety Officer	
Public Info. Officer	
Liaison Officer	

4. Agency/Organization Representatives:	
Agency/Organization	Name

5. Planning Section:	
Chief	
Deputy	
Resources Unit	
Situation Unit	
Documentation Unit	
Demobilization Unit	
Technical Specialists	

6. Logistics Section:	
Chief	
Deputy	
Support Branch	
Director	
Supply Unit	
Facilities Unit	
Ground Support Unit	
Service Branch	
Director	
Communications Unit	
Medical Unit	
Food Unit	

7. Operations Section:		
Chief		
Deputy		
Staging Area		
Branch		
Branch Director		
Deputy		
Division/Group		
Division/Group		
Division/Group		
Division/Group		
Branch		
Branch Director		
Deputy		
Division/Group		
Division/Group		
Division/Group		
Division/Group		
Branch		
Branch Director		
Deputy		
Division/Group		
Division/Group		
Division/Group		
Division/Group		
Division/Group		
Air Operations Branch		
Air Ops Branch Dir.		

8. Finance/Administration Section:	
Chief	
Deputy	
Time Unit	
Procurement Unit	
Comp/Claims Unit	
Cost Unit	

9. Prepared by: Name: _____ Position/Title: _____ Signature: _____

ICS 203 | **IAP Page** _____ | Date/Time: _____

ICS 203
Organization Assignment List

Purpose. The Organization Assignment List (ICS 203) provides ICS personnel with information on the units that are currently activated and the names of personnel staffing each position/unit. It is used to complete the Incident Organization Chart (ICS 207) which is posted on the Incident Command Post display. An actual organization will be incident or event-specific. **Not all positions need to be filled.** Some blocks may contain more than one name. The size of the organization is dependent on the magnitude of the incident, and can be expanded or contracted as necessary.

Preparation. The Resources Unit prepares and maintains this list under the direction of the Planning Section Chief. Complete only the blocks for the positions that are being used for the incident. If a trainee is assigned to a position, indicate this with a "T" in parentheses behind the name (e.g., "A. Smith (T)").

Distribution. The ICS 203 is duplicated and attached to the Incident Objectives (ICS 202) and given to all recipients as part of the Incident Action Plan (IAP). All completed original forms must be given to the Documentation Unit.

Notes:

- The ICS 203 serves as part of the IAP.
- If needed, more than one name can be put in each block by inserting a slash.
- If additional pages are needed, use a blank ICS 203 and repaginate as needed.
- ICS allows for organizational flexibility, so the Intelligence/Investigations Function can be embedded in several different places within the organizational structure.

Block Number	Block Title	Instructions
1	**Incident Name**	Enter the name assigned to the incident.
2	**Operational Period** • Date and Time From • Date and Time To	Enter the start date (month/day/year) and time (using the 24-hour clock) and end date and time for the operational period to which the form applies.
3	**Incident Commander(s) and Command Staff** • IC/UCs • Deputy • Safety Officer • Public Information Officer • Liaison Officer	Enter the names of the Incident Commander(s) and Command Staff. Label Assistants to Command Staff as such (for example, "Assistant Safety Officer"). For all individuals, use at least the first initial and last name. For Unified Command, also include agency names.
4	**Agency/Organization Representatives** • Agency/Organization • Name	Enter the agency/organization names and the names of their representatives. For all individuals, use at least the first initial and last name.
5	**Planning Section** • Chief • Deputy • Resources Unit • Situation Unit • Documentation Unit • Demobilization Unit • Technical Specialists	Enter the name of the Planning Section Chief, Deputy, and Unit Leaders after each position title. List Technical Specialists with an indication of specialty. If there is a shift change during the specified operational period, list both names, separated by a slash. For all individuals, use at least the first initial and last name.

Block Number	Block Title	Instructions
6	**Logistics Section** • Chief • Deputy **Support Branch** • Director • Supply Unit • Facilities Unit • Ground Support Unit **Service Branch** • Director • Communications Unit • Medical Unit • Food Unit	Enter the name of the Logistics Section Chief, Deputy, Branch Directors, and Unit Leaders after each position title. If there is a shift change during the specified operational period, list both names, separated by a slash. For all individuals, use at least the first initial and last name.
7	**Operations Section** • Chief • Deputy • Staging Area **Branch** • Branch Director • Deputy • Division/Group **Air Operations Branch** • Air Operations Branch Director	Enter the name of the Operations Section Chief, Deputy, Branch Director(s), Deputies, and personnel staffing each of the listed positions. For Divisions/Groups, enter the Division/Group identifier in the left column and the individual's name in the right column. Branches and Divisions/Groups may be named for functionality or by geography. For Divisions/Groups, indicate Division/Group Supervisor. Use an additional page if more than three Branches are activated. If there is a shift change during the specified operational period, list both names, separated by a slash. For all individuals, use at least the first initial and last name.
8	**Finance/Administration Section** • Chief • Deputy • Time Unit • Procurement Unit • Compensation/Claims Unit • Cost Unit	Enter the name of the Finance/Administration Section Chief, Deputy, and Unit Leaders after each position title. If there is a shift change during the specified operational period, list both names, separated by a slash. For all individuals, use at least the first initial and last name.
9	**Prepared by** • Name • Position/Title • Signature • Date/Time	Enter the name, ICS position, and signature of the person preparing the form. Enter date (month/day/year) and time prepared (24-hour clock).

ASSIGNMENT LIST (ICS 204)

1. Incident Name:	2. Operational Period: Date From: Date To: Time From: Time To:	3. **Branch:** **Division:** **Group:** **Staging Area:**

4. Operations Personnel: Name Contact Number(s)

Operations Section Chief: _____

Branch Director: _____

Division/Group Supervisor: _____

5. Resources Assigned:		# of Persons	Contact (e.g., phone, pager, radio frequency, etc.)	Reporting Location, Special Equipment and Supplies, Remarks, Notes, Information
Resource Identifier	Leader			

6. Work Assignments:

7. Special Instructions:

8. Communications (radio and/or phone contact numbers needed for this assignment)**:**

Name/Function	Primary Contact: indicate cell, pager, or radio (frequency/system/channel)
/	
/	
/	
/	

9. Prepared by: Name: _____ Position/Title: _____ Signature: _____

ICS 204
Assignment List

Purpose. The Assignment List(s) (ICS 204) informs Division and Group supervisors of incident assignments. Once the Command and General Staffs agree to the assignments, the assignment information is given to the appropriate Divisions and Groups.

Preparation. The ICS 204 is normally prepared by the Resources Unit, using guidance from the Incident Objectives (ICS 202), Operational Planning Worksheet (ICS 215), and the Operations Section Chief. It must be approved by the Incident Commander, but may be reviewed and initialed by the Planning Section Chief and Operations Section Chief as well.

Distribution. The ICS 204 is duplicated and attached to the ICS 202 and given to all recipients as part of the Incident Action Plan (IAP). In some cases, assignments may be communicated via radio/telephone/fax. All completed original forms must be given to the Documentation Unit.

Notes:

- The ICS 204 details assignments at Division and Group levels and is part of the IAP.
- Multiple pages/copies can be used if needed.
- If additional pages are needed, use a blank ICS 204 and repaginate as needed.

Block Number	Block Title	Instructions
1	**Incident Name**	Enter the name assigned to the incident.
2	**Operational Period** • Date and Time From • Date and Time To	Enter the start date (month/day/year) and time (using the 24-hour clock) and end date and time for the operational period to which the form applies.
3	**Branch** **Division** **Group** **Staging Area**	This block is for use in a large IAP for reference only. Write the alphanumeric abbreviation for the Branch, Division, Group, and Staging Area (e.g., "Branch 1," "Division D," "Group 1A") in large letters for easy referencing.
4	**Operations Personnel** • Name, Contact Number(s) – Operations Section Chief – Branch Director – Division/Group Supervisor	Enter the name and contact numbers of the Operations Section Chief, applicable Branch Director(s), and Division/Group Supervisor(s).
5	**Resources Assigned**	Enter the following information about the resources assigned to the Division or Group for this period:
	• Resource Identifier	The identifier is a unique way to identify a resource (e.g., ENG-13, IA-SCC-413). If the resource has been ordered but no identification has been received, use TBD (to be determined).
	• Leader	Enter resource leader's name.
	• # of Persons	Enter total number of persons for the resource assigned, including the leader.
	• Contact (e.g., phone, pager, radio frequency, etc.)	Enter primary means of contacting the leader or contact person (e.g., radio, phone, pager, etc.). Be sure to include the area code when listing a phone number.
5 (continued)	• Reporting Location, Special Equipment and Supplies, Remarks, Notes, Information	Provide special notes or directions specific to this resource. If required, add notes to indicate: (1) specific location/time where the resource should report or be dropped off/picked up; (2) special equipment and supplies that will be used or needed; (3) whether or not the resource received briefings; (4) transportation needs; or (5) other information.

Block Number	Block Title	Instructions
6	**Work Assignments**	Provide a statement of the tactical objectives to be achieved within the operational period by personnel assigned to this Division or Group.
7	**Special Instructions**	Enter a statement noting any safety problems, specific precautions to be exercised, dropoff or pickup points, or other important information.
8	**Communications** (radio and/or phone contact numbers needed for this assignment) • Name/Function • Primary Contact: indicate cell, pager, or radio (frequency/system/channel)	Enter specific communications information (including emergency numbers) for this Branch/Division/Group. If radios are being used, enter function (command, tactical, support, etc.), frequency, system, and channel from the Incident Radio Communications Plan (ICS 205). Phone and pager numbers should include the area code and any satellite phone specifics. In light of potential IAP distribution, use sensitivity when including cell phone number. Add a secondary contact (phone number or radio) if needed.
9	**Prepared by** • Name • Position/Title • Signature • Date/Time	Enter the name, ICS position, and signature of the person preparing the form. Enter date (month/day/year) and time prepared (24-hour clock).

INCIDENT RADIO COMMUNICATIONS PLAN (ICS 205)

1. Incident Name:	2. Date/Time Prepared: Date: Time:	3. Operational Period: Date From: Date To: Time From: Time To:

4. Basic Radio Channel Use:

Zone Grp.	Ch #	Function	Channel Name/Trunked Radio System Talkgroup	Assignment	RX Freq N or W	RX Tone/NAC	TX Freq N or W	TX Tone/NAC	Mode (A, D, or M)	Remarks

5. Special Instructions:

6. Prepared by (Communications Unit Leader) Name: _____ Signature: _____

ICS 205	IAP Page _____	Date/Time: _____

ICS 205
Incident Radio Communications Plan

Purpose. The Incident Radio Communications Plan (ICS 205) provides information on all radio frequency or trunked radio system talkgroup assignments for each operational period. The plan is a summary of information obtained about available radio frequencies or talkgroups and the assignments of those resources by the Communications Unit Leader for use by incident responders. Information from the Incident Radio Communications Plan on frequency or talkgroup assignments is normally placed on the Assignment List (ICS 204).

Preparation. The ICS 205 is prepared by the Communications Unit Leader and given to the Planning Section Chief for inclusion in the Incident Action Plan.

Distribution. The ICS 205 is duplicated and attached to the Incident Objectives (ICS 202) and given to all recipients as part of the Incident Action Plan (IAP). All completed original forms must be given to the Documentation Unit. Information from the ICS 205 is placed on Assignment Lists.

Notes:

- The ICS 205 is used to provide, in one location, information on all radio frequency assignments down to the Division/Group level for each operational period.
- The ICS 205 serves as part of the IAP.

Block Number	Block Title	Instructions
1	**Incident Name**	Enter the name assigned to the incident.
2	**Date/Time Prepared**	Enter date prepared (month/day/year) and time prepared (using the 24-hour clock).
3	**Operational Period** • Date and Time From • Date and Time To	Enter the start date (month/day/year) and time (using the 24-hour clock) and end date and time for the operational period to which the form applies.
4	**Basic Radio Channel Use**	Enter the following information about radio channel use:
	Zone Group	
	Channel Number	Use at the Communications Unit Leader's discretion. Channel Number (Ch #) may equate to the channel number for incident radios that are programmed or cloned for a specific Communications Plan, or it may be used just as a reference line number on the ICS 205 document.
	Function	Enter the Net function each channel or talkgroup will be used for (Command, Tactical, Ground-to-Air, Air-to-Air, Support, Dispatch).
	Channel Name/Trunked Radio System Talkgroup	Enter the nomenclature or commonly used name for the channel or talk group such as the National Interoperability Channels which follow DHS frequency Field Operations Guide (FOG).
	Assignment	Enter the name of the ICS Branch/Division/Group/Section to which this channel/talkgroup will be assigned.
	RX (Receive) Frequency (N or W)	Enter the Receive Frequency (RX Freq) as the mobile or portable subscriber would be programmed using xxx.xxxx out to four decimal places, followed by an "N" designating narrowband or a "W" designating wideband emissions. The name of the specific trunked radio system with which the talkgroup is associated may be entered across all fields on the ICS 205 normally used for conventional channel programming information.
	RX Tone/NAC	Enter the Receive Continuous Tone Coded Squelch System (CTCSS) subaudible tone (RX Tone) or Network Access Code (RX NAC) for the receive frequency as the mobile or portable subscriber would be programmed.

Block Number	Block Title	Instructions
4 (continued)	TX (Transmit) Frequency (N or W)	Enter the Transmit Frequency (TX Freq) as the mobile or portable subscriber would be programmed using xxx.xxxx out to four decimal places, followed by an "N" designating narrowband or a "W" designating wideband emissions.
	TX Tone/NAC	Enter the Transmit Continuous Tone Coded Squelch System (CTCSS) subaudible tone (TX Tone) or Network Access Code (TX NAC) for the transmit frequency as the mobile or portable subscriber would be programmed.
	Mode (A, D, or M)	Enter "A" for analog operation, "D" for digital operation, or "M" for mixed mode operation.
	Remarks	Enter miscellaneous information concerning repeater locations, information concerning patched channels or talkgroups using links or gateways, etc.
5	**Special Instructions**	Enter any special instructions (e.g., using cross-band repeaters, secure-voice, encoders, private line (PL) tones, etc.) or other emergency communications needs). If needed, also include any special instructions for handling an incident within an incident.
6	**Prepared by** (Communications Unit Leader) • Name • Signature • Date/Time	Enter the name and signature of the person preparing the form, typically the Communications Unit Leader. Enter date (month/day/year) and time prepared (24-hour clock).

COMMUNICATIONS LIST (ICS 205A)

1. Incident Name:	2. Operational Period: Date From: Date To: Time From: Time To:

3. Basic Local Communications Information:

Incident Assigned Position	Name (Alphabetized)	Method(s) of Contact (phone, pager, cell, etc.)

4. Prepared by: Name: _____ Position/Title: _____ Signature: _____

ICS 205A | **IAP Page** _____ | Date/Time: _____

ICS 205A
Communications List

Purpose. The Communications List (ICS 205A) records methods of contact for incident personnel. While the Incident Radio Communications Plan (ICS 205) is used to provide information on all radio frequencies down to the Division/Group level, the ICS 205A indicates all methods of contact for personnel assigned to the incident (radio frequencies, phone numbers, pager numbers, etc.), and functions as an incident directory.

Preparation. The ICS 205A can be filled out during check-in and is maintained and distributed by Communications Unit personnel. This form should be updated each operational period.

Distribution. The ICS 205A is distributed within the ICS organization by the Communications Unit, and posted as necessary. All completed original forms must be given to the Documentation Unit. If this form contains sensitive information such as cell phone numbers, it should be clearly marked in the header that it contains sensitive information and is not for public release.

Notes:

- The ICS 205A is an optional part of the Incident Action Plan (IAP).
- This optional form is used in conjunction with the ICS 205.
- If additional pages are needed, use a blank ICS 205A and repaginate as needed.

Block Number	Block Title	Instructions
1	**Incident Name**	Enter the name assigned to the incident.
2	**Operational Period** • Date and Time From • Date and Time To	Enter the start date (month/day/year) and time (using the 24-hour clock) and end date and time for the operational period to which the form applies.
3	**Basic Local Communications Information**	Enter the communications methods assigned and used for personnel by their assigned ICS position.
	• Incident Assigned Position	Enter the ICS organizational assignment.
	• Name	Enter the name of the assigned person.
	• Method(s) of Contact (phone, pager, cell, etc.)	For each assignment, enter the radio frequency and contact number(s) to include area code, etc. If applicable, include the vehicle license or ID number assigned to the vehicle for the incident (e.g., HAZMAT 1, etc.).
4	**Prepared by** • Name • Position/Title • Signature • Date/Time	Enter the name, ICS position, and signature of the person preparing the form. Enter date (month/day/year) and time prepared (24-hour clock).

MEDICAL PLAN (ICS 206)

1. Incident Name:	2. Operational Period: Date From: Date To: Time From: Time To:

3. Medical Aid Stations:

Name	Location	Contact Number(s)/Frequency	Paramedics on Site?
			☐ Yes ☐ No
			☐ Yes ☐ No
			☐ Yes ☐ No
			☐ Yes ☐ No
			☐ Yes ☐ No
			☐ Yes ☐ No

4. Transportation (indicate air or ground)**:**

Ambulance Service	Location	Contact Number(s)/Frequency	Level of Service
			☐ ALS ☐ BLS
			☐ ALS ☐ BLS
			☐ ALS ☐ BLS
			☐ ALS ☐ BLS

5. Hospitals:

Hospital Name	Address, Latitude & Longitude if Helipad	Contact Number(s)/ Frequency	Travel Time		Trauma Center	Burn Center	Helipad
			Air	Ground			
					☐ Yes Level:_____ ☐ No	☐ Yes ☐ No	☐ Yes ☐ No
					☐ Yes Level:_____ ☐ No	☐ Yes ☐ No	☐ Yes ☐ No
					☐ Yes Level:_____ ☐ No	☐ Yes ☐ No	☐ Yes ☐ No
					☐ Yes Level:_____ ☐ No	☐ Yes ☐ No	☐ Yes ☐ No
					☐ Yes Level:_____ ☐ No	☐ Yes ☐ No	☐ Yes ☐ No

6. Special Medical Emergency Procedures:

☐ Check box if aviation assets are utilized for rescue. If assets are used, coordinate with Air Operations.

7. Prepared by (Medical Unit Leader)**:** Name: _____ Signature: _____

8. Approved by (Safety Officer)**:** Name: _____ Signature: _____

ICS 206	IAP Page _____	Date/Time: _____

ICS 206
Medical Plan

Purpose. The Medical Plan (ICS 206) provides information on incident medical aid stations, transportation services, hospitals, and medical emergency procedures.

Preparation. The ICS 206 is prepared by the Medical Unit Leader and reviewed by the Safety Officer to ensure ICS coordination. If aviation assets are utilized for rescue, coordinate with Air Operations.

Distribution. The ICS 206 is duplicated and attached to the Incident Objectives (ICS 202) and given to all recipients as part of the Incident Action Plan (IAP). Information from the plan pertaining to incident medical aid stations and medical emergency procedures may be noted on the Assignment List (ICS 204). All completed original forms must be given to the Documentation Unit.

Notes:

- The ICS 206 serves as part of the IAP.
- This form can include multiple pages.

Block Number	Block Title	Instructions
1	**Incident Name**	Enter the name assigned to the incident.
2	**Operational Period** • Date and Time From • Date and Time To	Enter the start date (month/day/year) and time (using the 24-hour clock) and end date and time for the operational period to which the form applies.
3	**Medical Aid Stations**	Enter the following information on the incident medical aid station(s):
	• Name	Enter name of the medical aid station.
	• Location	Enter the location of the medical aid station (e.g., Staging Area, Camp Ground).
	• Contact Number(s)/Frequency	Enter the contact number(s) and frequency for the medical aid station(s).
	• Paramedics on Site? ☐ Yes ☐ No	Indicate (yes or no) if paramedics are at the site indicated.
4	**Transportation** (indicate air or ground)	Enter the following information for ambulance services available to the incident:
	• Ambulance Service	Enter name of ambulance service.
	• Location	Enter the location of the ambulance service.
	• Contact Number(s)/Frequency	Enter the contact number(s) and frequency for the ambulance service.
	• Level of Service ☐ ALS ☐ BLS	Indicate the level of service available for each ambulance, either ALS (Advanced Life Support) or BLS (Basic Life Support).

Block Number	Block Title	Instructions
5	**Hospitals**	Enter the following information for hospital(s) that could serve this incident:
	• Hospital Name	Enter hospital name and identify any predesignated medivac aircraft by name a frequency.
	• Address, Latitude & Longitude if Helipad	Enter the physical address of the hospital and the latitude and longitude if the hospital has a helipad.
	• Contact Number(s)/ Frequency	Enter the contact number(s) and/or communications frequency(s) for the hospital.

	• Travel Time
	  • Air
	  • Ground
		Enter the travel time by air and ground from the incident to the hospital.

	• Trauma Center ☐ Yes Level:_____	Indicate yes and the trauma level if the hospital has a trauma center.
	• Burn Center ☐ Yes ☐ No	Indicate (yes or no) if the hospital has a burn center.
	• Helipad ☐ Yes ☐ No	Indicate (yes or no) if the hospital has a helipad. Latitude and Longitude data format need to compliment Medical Evacuation Helicopters and Medical Air Resources
6	**Special Medical Emergency Procedures**	Note any special emergency instructions for use by incident personnel, including (1) who should be contacted, (2) how should they be contacted; and (3) who manages an incident within an incident due to a rescue, accident, etc. Include procedures for how to report medical emergencies.
	☐ Check box if aviation assets are utilized for rescue. If assets are used, coordinate with Air Operations.	Self explanatory. Incident assigned aviation assets should be included in ICS 220.
7	**Prepared by** (Medical Unit Leader) • Name • Signature	Enter the name and signature of the person preparing the form, typically the Medical Unit Leader. Enter date (month/day/year) and time prepared (24-hour clock).
8	**Approved by** (Safety Officer) • Name • Signature • Date/Time	Enter the name of the person who approved the plan, typically the Safety Officer. Enter date (month/day/year) and time reviewed (24-hour clock).

SAFETY MESSAGE/PLAN (ICS 208)

1. Incident Name:	2. Operational Period: Date From: Date To: Time From: Time To:

3. Safety Message/Expanded Safety Message, Safety Plan, Site Safety Plan:

4. Site Safety Plan Required? Yes ☐ No ☐

Approved Site Safety Plan(s) Located At:

5. Prepared by: Name: _____ Position/Title: _____ Signature: _____

ICS 208	IAP Page _____	Date/Time: _____

ICS 208
Safety Message/Plan

Purpose. The Safety Message/Plan (ICS 208) expands on the Safety Message and Site Safety Plan.

Preparation. The ICS 208 is an optional form that may be included and completed by the Safety Officer for the Incident Action Plan (IAP).

Distribution. The ICS 208, if developed, will be reproduced with the IAP and given to all recipients as part of the IAP. All completed original forms must be given to the Documentation Unit.

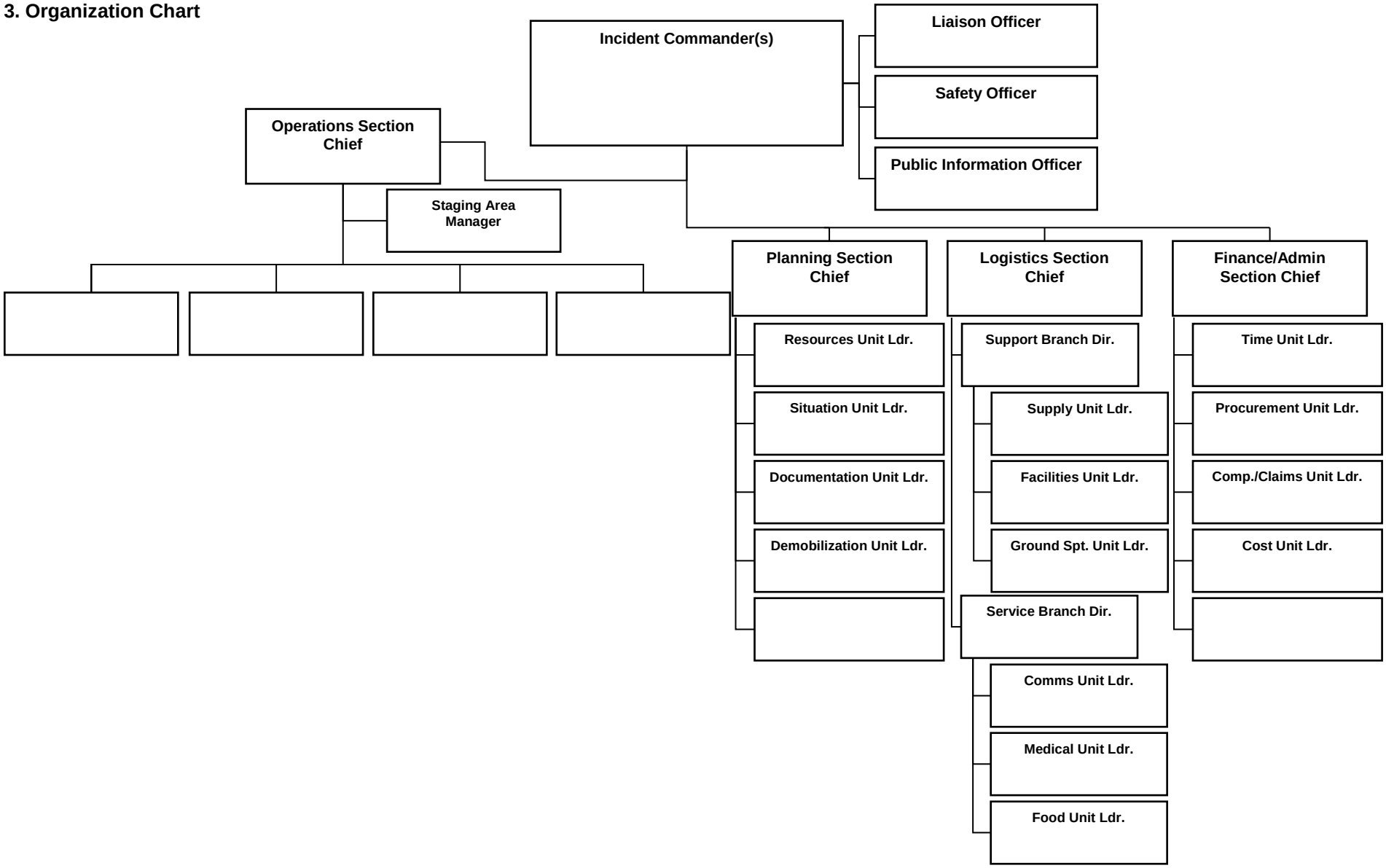
Notes:
- The ICS 208 may serve (optionally) as part of the IAP.
- Use additional copies for continuation sheets as needed, and indicate pagination as used.

Block Number	Block Title	Instructions
1	**Incident Name**	Enter the name assigned to the incident.
2	**Operational Period** • Date and Time From • Date and Time To	Enter the start date (month/day/year) and time (using the 24-hour clock) and end date and time for the operational period to which the form applies.
3	**Safety Message/Expanded Safety Message, Safety Plan, Site Safety Plan**	Enter clear, concise statements for safety message(s), priorities, and key command emphasis/decisions/directions. Enter information such as known safety hazards and specific precautions to be observed during this operational period. If needed, additional safety message(s) should be referenced and attached.
4	**Site Safety Plan Required?** Yes ☐ No ☐	Check whether or not a site safety plan is required for this incident.
	Approved Site Safety Plan(s) Located At	Enter where the approved Site Safety Plan(s) is located.
5	**Prepared by** • Name • Position/Title • Signature • Date/Time	Enter the name, ICS position, and signature of the person preparing the form. Enter date (month/day/year) and time prepared (24-hour clock).

INCIDENT ORGANIZATION CHART (ICS 207)

1. Incident Name:	2. Operational Period: Date From: Date To: Time From: Time To:

3. Organization Chart



ICS 207	IAP Page ___	4. Prepared by: Name:_____ Position/Title: _____ Signature: _____ Date/Time: _____

ICS 207
Incident Organization Chart

Purpose. The Incident Organization Chart (ICS 207) provides a **visual wall chart** depicting the ICS organization position assignments for the incident. The ICS 207 is used to indicate what ICS organizational elements are currently activated and the names of personnel staffing each element. An actual organization will be event-specific. The size of the organization is dependent on the specifics and magnitude of the incident and is scalable and flexible. Personnel responsible for managing organizational positions are listed in each box as appropriate.

Preparation. The ICS 207 is prepared by the Resources Unit Leader and reviewed by the Incident Commander. Complete only the blocks where positions have been activated, and add additional blocks as needed, especially for Agency Representatives and all Operations Section organizational elements. For detailed information about positions, consult the NIMS ICS Field Operations Guide. The ICS 207 is intended to be used as a wall-size chart and printed on a plotter for better visibility. A chart is completed for each operational period, and updated when organizational changes occur.

Distribution. The ICS 207 is intended to be **wall mounted** at Incident Command Posts and other incident locations as needed, and is not intended to be part of the Incident Action Plan (IAP). All completed original forms must be given to the Documentation Unit.

Notes:

- The ICS 207 is intended to be **wall mounted** (printed on a plotter). Document size can be modified based on individual needs.
- Also available as 8½ x 14 (legal size) chart.
- ICS allows for organizational flexibility, so the Intelligence/Investigative Function can be embedded in several different places within the organizational structure.
- Use additional pages if more than three branches are activated. Additional pages can be added based on individual need (such as to distinguish more Division/Groups and Branches as they are activated).

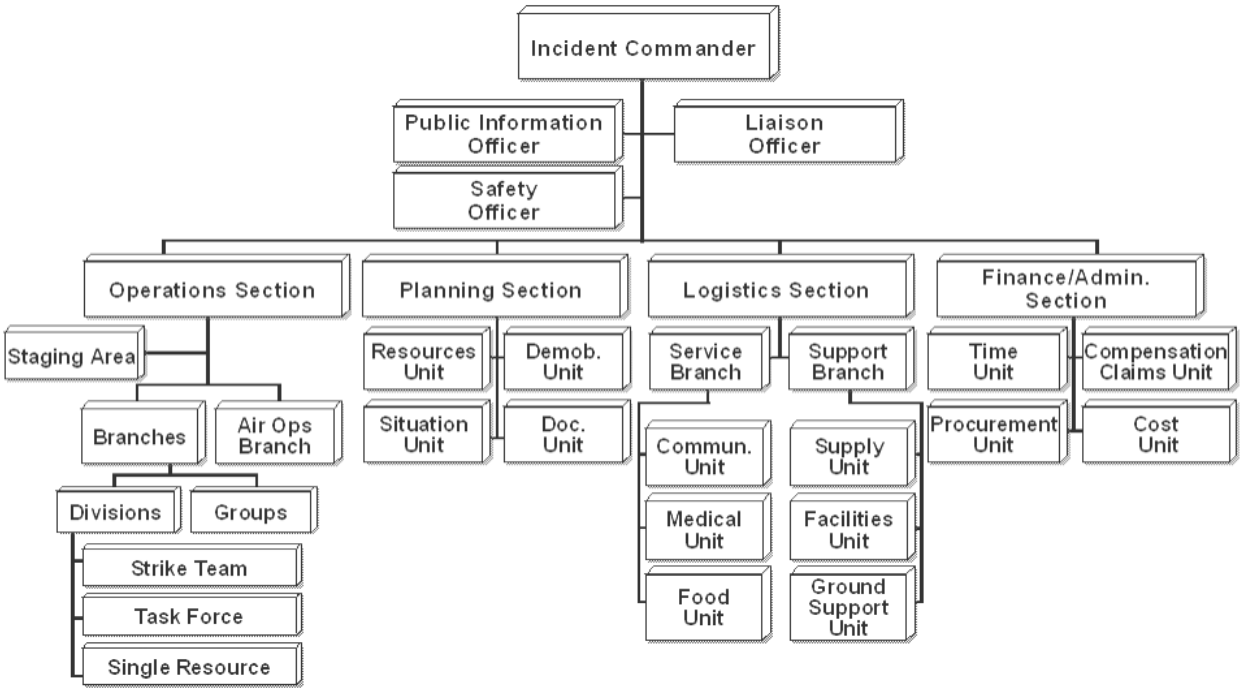
Block Number	Block Title	Instructions
1	**Incident Name**	Print the name assigned to the incident.
2	**Operational Period** • Date and Time From • Date and Time To	Enter the start date (month/day/year) and time (using the 24-hour clock) and end date and time for the operational period to which the form applies.
3	**Organization Chart**	• Complete the incident organization chart. • For all individuals, use at least the first initial and last name. • List agency where it is appropriate, such as for Unified Commanders. • If there is a shift change during the specified operational period, list both names, separated by a slash.
4	**Prepared by** • Name • Position/Title • Signature • Date/Time	Enter the name, ICS position, and signature of the person preparing the form. Enter date (month/day/year) and time prepared (24-hour clock).

Appendix C – ICS Position Guides

ICS Organizational Structure and Elements

EXTRACTED FROM - E/L/G 0300 INTERMEDIATE INCIDENT COMMAND SYSTEM FOR EXPANDING INCIDENTS, ICS 300

ICS Organizational Structure and Elements



- **Command Staff:** The staff who report directly to the Incident Commander, including the Public Information Officer, Safety Officer, Liaison Officer, and other positions as required.
- **Section:** The organizational level having responsibility for a major functional area of incident management (e.g., Operations, Planning, Logistics, Finance/Administration, and Intelligence/Investigations (if established)). The Section is organizationally situated between the Branch and the Incident Command.
- **Branch:** The organizational level having functional and/or geographical responsibility for major aspects of incident operations. A Branch is organizationally situated between the Section Chief and the Division or Group in the Operations Section, and between the Section and Units in the Logistics Section. Branches are identified by the use of Roman numerals or by functional area.
- **Division:** The organizational level having responsibility for operations within a defined geographic area. The Division level is organizationally between the Strike Team and the Branch.
- **Group:** An organizational subdivision established to divide the incident management structure into functional areas of operation. Groups are located between Branches (when activated) and resources (personnel, equipment, teams, supplies, and facilities) in the Operations Section.

- **Unit:** The organizational element with functional responsibility for a specific incident planning, logistics, or finance/administration activity.
- **Task Force:** Any combination of resources assembled to support a specific mission or operational need. A Task Force will contain resources of *different kinds and types*, All resource elements within a Task Force must have common communications and a designated leader.
- **Strike Team/ Resource Team:** A set number of resources of the *same kind and type* that have an established minimum number of personnel, common communications, and a designated leader. In the law enforcement community, Strike Teams are sometimes referred to as Resource Teams.
- **Single Resource:** An individual, a piece of equipment and its personnel complement, or a crew/team of individuals with an identified work supervisor that can be used on an incident.

Overall Organizational Functions

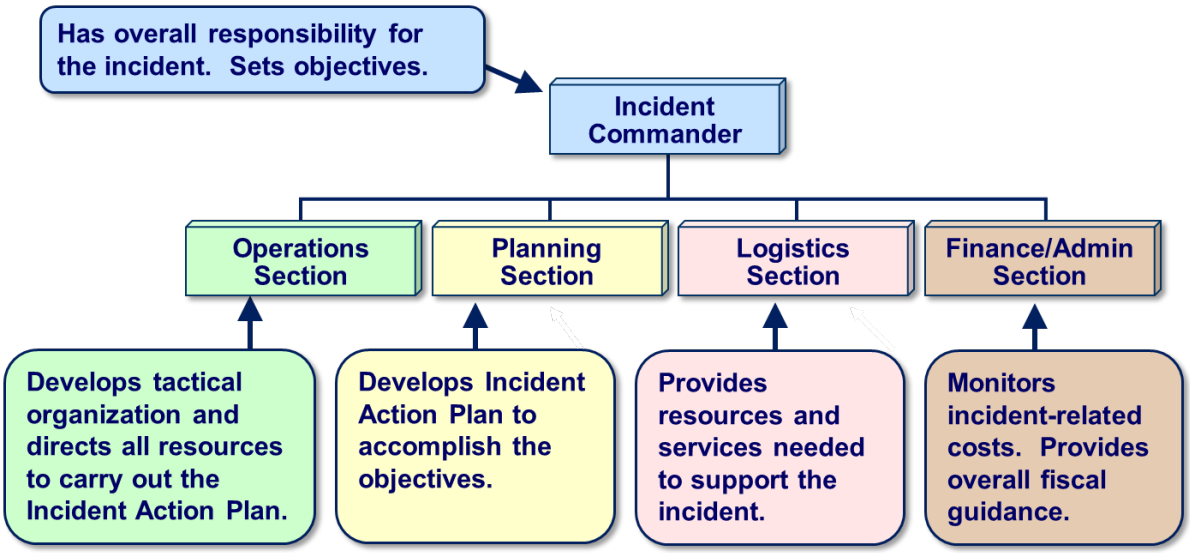
ICS was designed by identifying the primary activities or functions necessary to effectively respond to incidents. Analyses of incident reports and review of military organizations were all used in ICS development. These analyses identified the primary needs of incidents.

As incidents became more complex, difficult, and expensive, the need for an organizational manager became more evident. Thus, in ICS, and especially in larger incidents, the Incident Commander manages the organization and not the incident.

In addition to the Command function, other desired functions and activities were to:

- Delegate authority and provide a separate organizational level within the ICS structure with sole responsibility for the tactical direction and control of resources.
- Provide logistical support to the incident organization.
- Provide planning services for both current and future activities.
- Provide cost assessment, time recording, and procurement control necessary to support the incident and the managing of claims.
- Promptly and effectively interact with the media, and provide informational services for the incident, involved agencies, and the public.
- Provide a safe operating environment within all parts of the incident organization.
- Ensure that assisting and cooperating agencies' needs are met, and to see that they are used in an effective manner.

ICS – Who Does What?



Incident Commander

The Incident Commander is technically not a part of either the General or Command Staff. The Incident Commander is responsible for:

- Having clear authority and knowing agency policy.
- Ensuring incident safety.
- Establishing an Incident Command Post.
- Setting priorities, and determining incident objectives and strategies to be followed.
- Establishing the ICS organization needed to manage the incident.
- Approving the Incident Action Plan.
- Coordinating Command and General Staff activities.
- Approving resource requests and use of volunteers and auxiliary personnel.
- Ensuring after-action reports are completed.
- Authorizing information release to the media.
- Ordering demobilization as needed.

Incident Management Team

An Incident Management Team (IMT) is a rostered group of ICS-qualified personnel consisting of an Incident Commander, Command and General Staff, and personnel assigned to other key ICS positions. The level of training and experience of the IMT members, coupled with the identified formal response requirements and responsibilities of the IMT, are factors in determining “type,” or level, of IMT.

Command Staff

The Command Staff is assigned to carry out staff functions needed to support the Incident Commander. These functions include interagency liaison, incident safety, and public information.

Command Staff positions are established to assign responsibility for key activities not specifically identified in the General Staff functional elements. These positions may include the Public Information Officer (PIO), Safety Officer (SO), and Liaison Officer (LNO), in addition to various others, as required and assigned by the Incident Commander.

General Staff

The General Staff represents and is responsible for the functional aspects of the Incident Command structure. The General Staff typically consists of the Operations, Planning, Logistics, and Finance/Administration Sections. In some incidents the General Staff may also include the Intelligence/Investigations Function, either operating under a staff section, or as a stand alone section.

General guidelines related to General Staff positions include the following:

- Only one person will be designated to lead each General Staff position.
- General Staff positions may be filled by qualified persons from any agency or jurisdiction.
- Members of the General Staff report directly to the Incident Commander. If a General Staff position is not activated, the Incident Commander will have responsibility for that functional activity.
- Deputy positions may be established for each of the General Staff positions. Deputies are individuals fully qualified to fill the primary position. Deputies can be designated from other jurisdictions or agencies, as appropriate. This is a good way to bring about greater interagency coordination.
- General Staff members may exchange information with any person within the organization. Direction takes place through the chain of command. This is an important concept in ICS.
- General Staff positions should not be combined. For example, to establish a "Planning and Logistics Section," it is better to initially create the two separate

functions, and if necessary for a short time place one person in charge of both. That way, the transfer of responsibility can be made easier.

Public Information Officer Responsibilities

- Determine, according to direction from the IC, any limits on information release.
- Develop accurate, accessible, and timely information for use in press/media briefings.
- Obtain IC's approval of news releases.
- Conduct periodic media briefings.
- Arrange for tours and other interviews or briefings that may be required.
- Monitor and forward media information that may be useful to incident planning.
- Maintain current information, summaries, and/or displays on the incident.
- Make information about the incident available to incident personnel.
- Participate in planning meetings.

Safety Officer Responsibilities

- Identify and mitigate hazardous situations.
- Ensure safety messages and briefings are made.
- Exercise emergency authority to stop and prevent unsafe acts.
- Review the Incident Action Plan for safety implications.
- Assign assistants qualified to evaluate special hazards.
- Initiate preliminary investigation of accidents within the incident area.
- Review and approve the Medical Plan.
- Participate in planning meetings.

Liaison Officer Responsibilities

- Act as a point of contact for agency representatives.
- Maintain a list of assisting and cooperating agencies and agency representatives.
- Assist in setting up and coordinating interagency contacts.
- Monitor incident operations to identify current or potential interorganizational problems.
- Participate in planning meetings, providing current resource status, including limitations and capabilities of agency resources.

- Provide agency-specific demobilization information and requirements.

Assistants

- In the context of large or complex incidents, Command Staff members may need one or more assistants to help manage their workloads. Each Command Staff member is responsible for organizing his or her assistants for maximum efficiency.

Additional Command

- Staff Additional Command Staff positions may also be necessary depending on the nature and location(s) of the incident, and/or specific requirements established by the Incident Commander. For example, a Legal Counsel may be assigned directly to the Command Staff to advise the Incident Commander on legal matters, such as emergency proclamations, legality of evacuation orders, and legal rights and restrictions pertaining to media access. Similarly, a Medical Advisor may be designated and assigned directly to the Command Staff to provide advice and recommendations to the Incident Commander in the context of incidents involving medical and mental health services, mass casualty, acute care, vector control, epidemiology, and/or mass prophylaxis considerations, particularly in the response to a bioterrorism event.

Operations Section Chief Responsibilities

The Operations Section Chief is responsible for managing all tactical operations at an incident. The Incident Action Plan (IAP) provides the necessary guidance. The need to expand the Operations Section is generally dictated by the number of tactical resources involved and is influenced by span of control considerations.

Major responsibilities of the Operations Section Chief are to:

- Assure safety of tactical operations.
- Manage tactical operations.
- Develop the operations portion of the IAP.
- Supervise execution of operations portions of the IAP.
- Request additional resources to support tactical operations.
- Approve release of resources from active operational assignments.
- Make or approve expedient changes to the IAP.
- Maintain close contact with IC, subordinate Operations personnel, and other agencies involved in the incident.

Planning Section Chief Responsibilities

The Planning Section Chief is responsible for providing planning services for the incident. Under the direction of the Planning Section Chief, the Planning Section collects

situation and resources status information, evaluates it, and processes the information for use in developing action plans. Dissemination of information can be in the form of the IAP, in formal briefings, or through map and status board displays.

Major responsibilities of the Planning Section Chief are to:

- Collect and manage all incident-relevant operational data.
- Supervise preparation of the IAP.
- Provide input to the IC and Operations in preparing the IAP.
- Incorporate Traffic, Medical, and Communications Plans and other supporting materials into the IAP.
- Conduct and facilitate planning meetings.
- Reassign personnel within the ICS organization.
- Compile and display incident status information.
- Establish information requirements and reporting schedules for units (e.g., Resources and Situation Units).
- Determine need for specialized resources.
- Assemble and disassemble Task Forces and Strike Teams (or law enforcement Resource Teams) not assigned to Operations.
- Establish specialized data collection systems as necessary (e.g., weather).
- Assemble information on alternative strategies.
- Provide periodic predictions on incident potential.
- Report significant changes in incident status.
- Oversee preparation of the Demobilization Plan.

Logistics Section Chief Responsibilities

The Logistics Section Chief provides all incident support needs with the exception of logistics support to air operations. The Logistics Section is responsible for providing:

- Facilities.
- Transportation.
- Communications.
- Supplies.
- Equipment maintenance and fueling.
- Food services (for responders).
- Medical services (for responders).

- All off-incident resources.

Major responsibilities of the Logistics Section Chief are to:

- Provide all facilities, transportation, communications, supplies, equipment maintenance and fueling, food and medical services for incident personnel, and all off-incident resources.
- Manage all incident logistics.
- Provide logistical input to the IAP.
- Brief Logistics Staff as needed.
- Identify anticipated and known incident service and support requirements.
- Request additional resources as needed.
- Ensure and oversee the development of the Communications, Medical, and Traffic Plans as required.
- Oversee demobilization of the Logistics Section and associated resources.

Finance/Administration Section Chief Resposibilities

The Finance/Administration Section Chief is responsible for managing all financial aspects of an incident. Not all incidents will require a Finance/Administration Section. Only when the involved agencies have a specific need for finance services will the Section be activated. Major responsibilities of the Finance/Administration Section Chief are to:

- Manage all financial aspects of an incident.
- Provide financial and cost analysis information as requested.
- Ensure compensation and claims functions are being addressed relative to the incident.
- Gather pertinent information from briefings with responsible agencies.
- Develop an operating plan for the Finance/Administration Section and fill Section supply and support needs.
- Determine the need to set up and operate an incident commissary.
- Meet with assisting and cooperating agency representatives as needed.
- Maintain daily contact with agency(s) headquarters on finance matters.
- Ensure that personnel time records are completed accurately and transmitted to home agencies.
- Ensure that all obligation documents initiated at the incident are properly prepared and completed.

- Brief agency administrative personnel on all incident-related financial issues needing attention or followup.
- Provide input to the IAP.

Intelligence/Investigations Function

The collection, analysis, and sharing of incident-related information are important activities for all incidents. Typically, staff in the Planning Section are responsible for gathering and analyzing operational information and sharing situational awareness, and staff in the Operations Section are responsible for executing tactical activities.

However, some incidents involve intensive intelligence gathering and investigative activity, and for such incidents, the Incident Commander or Unified Command may opt to reconfigure intelligence and investigations responsibilities to meet the needs of the incident. This may occur when the incident involves a criminal or terrorist act and/or other non-law-enforcement intelligence/investigations efforts such as epidemiological investigations.

The purpose of the Intelligence/Investigations function is to ensure that intelligence and investigative operations and activities are properly managed and coordinated to:

- Prevent and/or deter potential unlawful activity, incidents, and/or attacks;
- Collect, process, analyze, secure, and disseminate information, intelligence, and situational awareness;
- Identify, document, process, collect, create a chain of custody for, safeguard, examine and analyze, and store evidence or specimens;
- Conduct thorough and comprehensive investigations that lead to the perpetrators' identification and apprehension;
- Conduct missing persons and mass fatality/death investigations;
- Inform and support life safety operations, including the safety and security of all response personnel, by helping to prevent future attacks or escalated impacts;
- Determine the source or cause of an ongoing incident (e.g., disease outbreak, fire, complex coordinated attack, or cyber incident) to control its impact and/or help prevent the occurrence of similar incidents.

The Incident Commander or Unified Command makes the final determination regarding the scope and placement of the Intelligence/Investigations function within the command structure. The intelligence/investigations function can be incorporated as an element of the Planning Section, in the Operations Section, within the Command Staff, as a separate General Staff section, or in some combination of these locations.

Additional information on the I/I function can be found in NIMS and in the Intelligence and Investigations Function Guidance and Field Operations Guide available on the FEMA website https://www.fema.gov/nims-doctrine-supporting-guides-tools.

Appendix D – News Release Template

Press Release (Example)

Press Release

Hamilton County Water
And Wastewater
Treatment Authority

(Insert Date)

The sanitary sewer system owned, operated and maintained by the Hamilton County Water and Wastewater Authority (WWTA) has recently experienced an overflow. This overflow occurred at (Insert Approximate Location) . The WWTA strives to prevent overflows from occurring and this overflow has been stopped.

Investigative efforts have begun in order to determine the cause of the overflow. If you would like more information regarding this overflow, please visit the Public Document Repository in the WWTA website here: https://wwta.hamiltontn.gov/178/Public-Document- Repository.

Appendix E – External Contact List

External Contact List

This External Contact List identifies names and phone numbers of external public agencies who must be contacted during an emergency. The ***Criteria*** established as the basis for immediately notifying the public and other impacted entities, including users with a downstream water intake, an emergency caused by an SSO, prohibited bypasses, or effluent limit violations are provided in ***blue italics.***

Name of Agency	Emergency Phone Number
City Fire Department, Police Department, Sheriff ***Notify in the event of any hazardous material entering the sewer, if there is an explosive atmosphere in the sewer, or if there is a fire at any WWTA facility. Also notify of an intrusion into the facilities and of a malevolent threat to the WWTA.***	Dial 911
Tennessee Department of Environment and Conservation (TDEC) Division of Water Pollution Control Chattanooga Environmental Field Office ***Notify via email TDEC Contact Person, Angela Oberschmidt of any SSO, prohibited bypasses, or effluent limit violations that may within 24 hours (in addition conduct a 5-day follow-up).***	email address: *angela.oberschmidt@tn.gov* Field Office phone number: 423-634-5745
Georgia Department of Natural Resources (DNR) **Environmental Protection Division (GAEPD)** ***Mountain District Cartersville Office*** ***Contact GAEPD for any SSO events that occur in Georgia***	770-387-4900 Fax: 770-387-4906 800-241-4113
Public Health Department - Chattanooga-Hamilton County Chattanooga, TN 37403 ***An Emergency Action level of "High" may trigger a Public Health notification.*** ***Notify Public Health of an illness or public health issue identified.***	24-hour Phone: 423-209-8077 *health@hamiltontn.gov*
Hamilton County Office of Emergency Management and Homeland Security ***The County OEMHS will be notified by the Fire Department if the emergency requires elevated assistance.*** Command and control during response and recovery phases of disasters and large-scale emergencies is maintained in the Emergency Operations Center.	24-hour 911 Dispatch Center: 423-209-6911 e-mail: *hcems@hamiltontn.gov*
Tennessee Emergency Management Agency (TEMA) Nashville, TN 37204 ***The County EMA will notify TEMA.*** TEMA's mission is to coordinate emergency management response and recovery to reduce loss of life and property in the State of Tennessee. TEMA provides assistance by reaching out for mutual aid from other departments or agencies of the state, from local jurisdictions, from other states and from the federal government. TEMA manages the flow of materiel and special teams and services to the incident commander.	800-262-3300 615-741-0001

Name of Agency	Emergency Phone Number
Tennessee -State Emergency Response Commission (TN SERC) **Hamilton County - Local Emergency Planning Committee (LEPC)** ***The State Emergency Response Commission (SERC) and the Local Emergency Planning Committee (LEPC) must be notified of the release of a reportable quantity (RQ) of hazardous chemical. The Executive Director is responsible for completing these notifications.***	3041 Sidco Drive Nashville, TN 37204 Phone: (615) 741-0001

Appendix F – WWTA Pump Stations

No.	PS NAME	ADDRESS	BASIN
1	Amos	9125 Amos Road	HC 25
2	Amos Road East	9200 Amos Road	HC 26
3	Bainbridge	7334 Ooltewah Georgetown Rd	<Null>
4	Bluebird	503 Bluebird Circle	ER 12
5	Brock Pointe	8020 Burgundy Circle	HC 30
6	Camp Columbus	1809 Albermarle Drive (loc on)	HC 08
7	Camp Jordan	317 Camp Jordan Pkwy	ER 12
8	Card	326 Maple Street	SD 07
9	Cedar Glen	311 Camp Jordan Parkway	ER 12
10	Country Oaks	9043 Dallas Hollow Road	HC 09
11	Dallas Hollow	9607 Dallas Hollow Road (row east of)	SD 06
12	Dayton Pike	NW of 11904 Dayton Pike (in row)	SD 11
13	Durham	Dayton Pike & Durham Street (on TVA)	SD 09
14	East Boy Scout	1605 East Boy Scout Road	HC 06
15	East Ridge	1018 Yale Street	ER 10
16	Frawley 1	533 Frawley Road	ER 12
17	Ft Stephenson Lower	1219 Ft Stephenson Oval (loc on)	LM 01
18	Ft Stephenson Upper	1219 Ft Stephenson Oval (loc on)	LM 01
19	Georgetown	8370 Gracie Mac Lane	HC 13
20	Germantown	594 Bonnie Lassie Avenue	ER 11
21	Green Gap	7526 Ooltewah Georgetown Road	HC 19
22	Hampton Creek	8215 Double Eagle Court	HC 16
23	Harrison Bay	8321 Harrison Bay Road	<Null>
24	Harrison Ooltewah	6383 Harrison Ooltewah Road	HC 23
25	Holland Johnson	1060 Holland Johnson Road (in row)	SD 01
26	Hurricane Creek	1425 Ooltewah Ringgold Road	HC 37
27	Igou Ferry	209 Igou Ferry Road	SD 05
28	Integra Hills	5227 LITTLE DEBBIE PKWY	HC 48

No.	PS NAME	ADDRESS	BASIN
29	Kings Valley	7602 Prince Drive	HC 18
30	Lake Carolyn	9015 Lake Carolyn Drive (loc on)	SD 03
31	Lakes of Standifer	8410 Standifer Gap Road	HC 36
32	Lakeside Circle	8250 West Lakeside Circle	HC 07
33	Laurel Cove	7260 Autumn Lake Trail (loc on)	HC 05
34	Lee	8844 Old Lee Highway	HC 26
35	London Woods	London Woods Sewer Extension, Force Main, & Pump Station	<Null>
36	Nature Trail	611 Hatch Trail	SD 12
37	Nolan	2521 Sam Powell Trail	SM 08B
38	Oak Brook	9810 East Brainerd Rd	HC 43
39	Posey Hollow	12101 Posey Hollow Road (loc on)	SD 10
40	Pottery Lane	146A Pottery Lane	SD 04
41	Prairie Pass	10916 East Brainerd Road	HC 45
42	Rhinehart Valley	10211 London Lane	HC 45
43	Ridgeside	300 Shepherd Ave	<Null>
44	Rogers Branch	8501 Rancho Drive	HC 21
45	Roy	8210 Roy Lane (loc on)	HC 14
46	SD EQ Storage PS	220 Industrial Park Drive (loc on)	SD 02
47	Sequoyah Access	1915 Sequoyah Access Road (south of)	HC 11
48	Short Tail Springs	7634 Short Tail Springs Road	HC 20
49	Signal Mountain Road	245 Signal Mountain Road	RB 01
50	Snow Hill	7600 Snow Hill Road	HC 17
51	Soddy Daisy Ind Park	220 Industrial Park Drive (loc on)	SD 02
52	Summit Springs (Fed-Ex)	5054 SUMMIT SPRING WAY	HC 50
53	Sunset Ridge	8330 Ooltewah Georgetown Road	HC 12
54	Sylar	7276 Sylar Road	HC 22
55	Textile Lane	87 Textile Lane	<Null>
56	Timber Ridge	8830 East Ridge Trail Road	HC 10

No.	PS NAME	ADDRESS	BASIN
57	West Brow	West Brow	LM 12
58	West Brow Oval	231 West Brow Oval	LM 04

Appendix G – Incident Investigation Report

Incident Investigation Report

SECTION 1: INCIDENT INVESTIGATION REPORT COVER		*(See Section 9 below for additional guidance.)*
Facility Name	Facility ID#	
Prepared By	Title	Date
Type of Accident		
Date of Accident *(day, month, and year)*	Time Accident Began *(hours and minutes)*	
NAICS Code of Process (if applicable) i.e. 221320 (Sewage Treatment Facilities)	Release Duration *(hours and minutes), if applicable*	
Describe chemical release Incident: Provide chemical name, CAS number, quantity released in pounds, percent weight of chemical in a mixture (toxics only), and process involved.		
Flooding: Describe in detail the flood scenario as it occurred.		
Tornado: Describe in detail the tornado scenario as it occurred.		
Employee Incident: Describe in detail the accident.		
Other Information:		

Incident Investigation Report

SECTION 2: WITNESS IDENTIFICATION	*Identify all personnel (including contract employees) that witnessed the incident in the space provided below. Instruct all witnesses to not discuss the incident with anyone until the incident investigation team has interviewed them. Witnesses shall prepare a written account of the incident (see Section 3 below) prior to being interviewed by the incident investigation team.*

Name	Title

Incident Investigation Report

SECTION 3: WITNESS ACCOUNT OF INCIDENT	*Witnesses shall prepare a written account of the incident prior to being interviewed by the incident investigation team.*
Name:	Title:
Instructions: Each witness shall prepare a written account of what they experienced in the space provided below. Summarize the events of the incident, what happened, and why it happened.. Identify the following: 1) Time and date of incident; 2) Event and source 3) Employee accident, flood, or tornado; 4) Initiating Event (equipment failure, human error, weather, unknown); 5) Contributing Factors (i.e. factors that led to the initiating event or contributed to the severity of the incident). Describe the weather conditions during the incident. Identify any other personnel involved. Estimate the duration and quantity of release. Attach sketches, additional sheets, etc. as needed.	

SECTION 4: WITNESS CERTIFICATION		
I certify that the above account of the incident is a complete and accurate description of the incident as I experienced it.	Witness Signature	Date/Time

Incident Investigation Report

SECTION 5: INCIDENT DESCRIPTION	*The following description of the incident is based on witness accounts of the incident (see Section 3), follow-up interviews with witnesses, and an evaluation of all collected evidence by the incident investigation team. Attach any sketches or notes as needed. See Section 9 for additional guidance for filling in this section of the report.*

5.1 Event *(select at least one)*

- □ Gas release
- □ Fire, explosion
- □ Tornado
- □ Liquid spill / evaporation
- □ Flooding
- □ Employee accident

5.2 Asset(s) involved in incident *(select at least one)*

- □ Storage Vessel
- □ Pump or Pump Station
- □ Piping, hose
- □
- □ Valve
- □ Other *(specify)* _____
- □ Manhole

5.3 Initiating Event *(select at least one)*

- □ Equipment Failure
- □ Natural (*weather conditions, earthquake*)
- □ Human error
- □ Unknown

5.4 Contributing Factors *(select all that apply)*

- □ Equipment Failure
- □ Unsuitable Equipment
- □ Human Error
- □ Unusual Weather Conditions
- □ Improper Procedure
- □ Management Error
- □ OvIRPressurization
- □ Other (*specify*) _____
- □ Upset Condition
- □ By-pass Condition
- □ Maintenance Activity/Inactivity
- □ Process Design Failure

5.5 Weather Conditions at Time of Event (*If Known*)

5.5.A Wind Speed_____ (*numerical*) □ miles/hr □ knots □ meters/sec (*check one*)

5.5.B Height of Wind Measurement_____ (*numerical*) □ meters □ feet (*check one*)

5.5.C Wind Direction

5.5.D Tornado Category

5.5. □ Temperature (°*F*)	5.5.E Stability Class (*A-F*)	5.5.F Precipitation and Flood Data

Incident Investigation Report

SECTION 5: INCIDENT DESCRIPTION (*continued*)

5.6 On-site Impacts

5.6.A Deaths (*enter numbers*)

Workers/Contractors _

Responders _____

Others _____

5.6.B Injuries (*enter numbers*)

Workers/Contractors _____ Offsite

Offsite Responders _____

_____

5.6.C Property Damage ($) _____

5.7 Known Offsite Impacts (*enter numbers*)

Deaths _____

Hospitalizations _____

Other Medical Treatment_

Evacuated _____

Sheltered In-Place _____

Property Damage ($) _____

5.8 Environmental Damage (*select all that apply*)

- □ Fish or animal kills
- □ Tree, lawn, shrub, or crop damage
- □ Water contamination
- □ Soil contamination
- □ Other (*specify*) _____

_____

5.9 Offsite Responders Notified

□ Police □ Fire □ Hazardous Materials Team □ Emergency Medical Services

Notes (*this space provided for any notes/comments*)

Incident Investigation Report

Section 6: Safety RECOMMENDATIONS	*For each safety recommendation resulting from the incident investigation, complete the following table. Attach all additional documentation regarding the evaluation and resolution of each recommendation. Note: all recommendations must be resolved to complete the incident investigation. (Attach additional sheets if needed.)*			
Describe Safety Recommendation and Intent	**Assigned To**	**Target Resolution Date**	**Date Resolved**	**Describe Resolution**

Incident Investigation Report

SECTION 7: CONCLUSIONS	*Provide a written summary of the investigation conclusions in the space provided below and identify any changes introduced as results of the accident. (Attach additional sheets if needed). See Section 9 for additional guidance for filling in this section of the report.*

7.1 Summary (*Summarize investigation conclusions here*)

7.2 Changes Introduced as a Result of the Accident *(select at least one)*

□ Improved/Upgraded Equipment	□ New Process Controls	□ Reduced Inventory
□ Revised Maintenance	□ New Mitigation Systems	□ None
□ Revised Training	□ Revised Emergency Response Plan	□ Other (*specify*) _____
□ Revised Operating Procedures	□ Changed Process	

Incident Investigation Report

SECTION 8: INCIDENT INVESTIGATION TEAM CERTIFICATION	*The incident investigation team members who sign below certify that they have reviewed and agree with the conclusions of this incident investigation report.*		
Name	**Title/Affiliation**	**Signature**	**Date**

Incident Investigation Report

SECTION 9: ADDITIONAL INSTRUCTIONS	*This section provides additional guidance for filling in selected items in selected sections of the Incident Investigation Report.*

Guidance for Completing Section 1

NAICS Code of Process – North American Industrial Classification System.

Chemical Release Duration - Indicate the approximate length of time of the release in minutes and Type of Chemical (regulated or non-regulated)

Quantity Released - Estimate the amount of each substance released in pounds.

Tornado: Document events leading up to tornado event.

Flooding: Document event leading up to the flooding event. Height of flood stage. Are assets located in a flood zone? Document where asset(s) lie on FEMA Flood Maps.

Employee Accident: Document details involving accident such as location of asset(s) and employee information.

Guidance for Completing Section 5

5.1 Release Event - Indicate which of the following release events best describes your accident. Check all that apply:

- *Gas Release.* A gas release is a release of the substance as a gas (rather than vaporized from a liquid). If you hold a gas liquefied under refrigeration, report the release as a liquid spill.
- *LiquidSpill/Evaporation.* A liquid spill/evaporation is a release of the substance in a liquid state with subsequent vaporization.
- *Fire.* A fire is combustion producing light, flames, and heat.
- *Explosion.* An explosion is a rapid chemical reaction with the production of noise, heat, and violent expansion of gases.

5.2 Release Source - Indicate all that apply.

- *Storage Vessel.* A storage vessel is a container for storing or holding gas or liquid. Storage vessels include transportation containers being used for on-site storage.
- *Piping.* Piping refers to a system of tubular structures or pipes used to carry a fluid or gas.
- *Process Vessel.* A process vessel is a container in which substances under certain conditions (e.g., temperature, pressure) participate in a process (e.g., substances are manufactured, blended to form a mixture, reacted to convert them into some other final product or form, or heated to purify).
- *Transfer Hose.* A transfer hose is a tubular structure used to connect, often temporarily, two or more vessels.
- *Valve.* A valve is a device used to regulate the flow in piping systems or machinery. Relief valves and rupture disks open to release pressure in vessels
- *Pump.* A pump is a device that raises, transfers. or compresses fluids or that attenuates gases by suction or pressure or both.
- *Joint.* The surface at which two or more mechanical components are united.
- *Other.* Specify other source of the release.

Incident Investigation Report

SECTION 9: ADDITIONAL INSTRUCTIONS	*This section provides additional guidance for filling in selected items in selected sections of the Incident Investigation Report.*

Guidance for Completing Section 5 - Continued

5.3 Initiating Event - Indicate the initiating event that was the immediate cause of the accident, if known. If you conducted an investigation of the release, you should have identified the initiating event.

- *Equipment Failure.* A device or piece of equipment failed or did not function as designed. For example, the vessel wall corroded or cracked.
- *Human Error.* An operator performed a task improperly, either by failing to take the necessary steps or by taking the wrong steps.
- *Weather Conditions.* Weather conditions, such as lightning, hail, ice storms, tornadoes, hurricanes, floods, or high winds, caused the accident.
- *Unknown.*

5.4 Contributing Factors - These are factors that contributed to the accident. but were not the initiating event. If you conducted an investigation of the release, you may have identified factors that led to the initiating event or contributed to the severity of the release. Indicate all that apply.

- *Equipment Failure*. A device or piece of equipment failed to function as designed, thereby allowing a substance leading to or worsening the accidental release.
- *Human Error.* An operator performed an operation improperly or made a mistake lead to or worsened the accident.
- *Improper Procedures.* The procedure did not reflect the proper method of operation, the procedure omitted steps that affected the accident, or the procedure was written in a manner that allowed for misintIRPretation of the instructions.
- *OvIRPressurization.* The process was operated at pressures exceeding the design working pressure.
- *Upset Condition.* Incorrect process conditions (e.g., increased temperature or pressure) contributed to the release.
- *By-pass Condition.* A failure occurred in a pipe, channel, or valve that diverts fluid flow from the main pathway when design process or storage conditions are exceeded (e.g., ovIRPressure). By-pass conditions may be designed to release the substance to restore acceptable process or storage conditions and prevent more severe consequences (e.g., explosion).
- *Maintenance* Activity*/lnactivity.* A failure occurred because of maintenance activity or inactivity. For example, the storage racks remained unpainted for so long that corrosion caused the metal to fail.
- *Process Design.* A failure resulted from an inherent flaw in the design of the process (e.g., pressure needed to make product exceeds the design pressure of the vessel).
- *Unsuitable Equipment.* The equipment used was incorrect for the process. For example, the forklift was too large for the corridors.
- *Unusual Weather Conditions.* Weather conditions, such as lightning, hail, ice storms, tornadoes, hurricanes, floods, or high winds contributed to the accident
- *Management Error.* A failure occurred because management did not exercise its managerial control to prevent the accident from occurring. This is usually used to describe faulty procedures, inadequate training, inadequate oversight, or failure to follow existing administrative procedures.

Incident Investigation Report

SECTION 9: ADDITIONAL INSTRUCTIONS	*This section provides additional guidance for filling in selected items in selected sections of the Incident Investigation Report.*

Guidance for Completing Section 5 - Continued

5.5 Weather Conditions at Time of Event (if known) - This information is important to those concerned with modeling the effects of accidents. Reliable information from those involved in the incident or from an on-site weather station is ideal. However, this rule does not require your facility to have a weather station. If you do not have an onsite weather station, use information from your local weather station, airport. or other source of meteorological data. To the extent possible, complete the following:

- *Wind Speed, height of wind measurement and Direction.* Wind speed is an estimate of how fast the wind is traveling. Indicate the speed in miles per hour. In addition, indicate the height the wind speed was measured at. Wind direction is the direction from which the wind comes. For example, a wind that blows from east to west would be described as having an eastern wind direction. You may describe wind direction as a standard compass reading such as "Northeast" or "South-southwest." You may also describe wind direction in degrees--with North as zero degrees and East as 90 degrees. Thus, northeast would represent 45 degrees and south-southwest would represent 202.5 degrees. Abbreviations for the wind direction such as NE (for northeast) and SSW (for south-southwest) are also acceptable.

- *Temperature.* The ambient temperature at the scene of the accident in degrees Fahrenheit. If you did not keep a record, you can use the high (for daytime releases) or low (for nighttime releases) for the day of the release. Local newspapers publish these data.

- *Stability Class.* Depending on the amount of incoming solar radiation as well as other factors, the atmosphere may be more or less turbulent at any given time. Meteorologists have defined six atmospheric stability classes, each representing a different degree of turbulence in the atmosphere. When moderate to strong incoming solar radiation heats air near the ground, causing it to rise and generating large eddies, the atmosphere is considered unstable, or relatively turbulent. Unstable conditions are associated with stability classes A and B. When solar radiation is relatively weak, air near the surface has less of a tendency to rise and less turbulence develops. In this case, the atmosphere is considered stable or less turbulent with weak winds. The stability class is E or F. Stability classes D and C represent conditions of neutral stability or moderate turbulence respectively. Neutral conditions are associated with relatively strong wind speeds and moderate solar radiation.

- *Tornado and Flood data:* Obtain from USGS, NOAA, County EMA.

Incident Investigation Report

SECTION 9: ADDITIONAL INSTRUCTIONS	*This section provides additional guidance for filling in selected items in selected sections of the Incident Investigation Report.*

Guidance for Completing Section 5 - Continued

Table A (below) presents the stability classes associated with wind speeds, time of day, and cloud cover.

Atmospheric Stability Classes

Surface Wind Speed at 10 Meters		Day			Night	
		Incoming Solar Radiation			Thinly Overcast or ≥ 4/8 Low Cloud	≤ 3/8 Cloud
Meters per Second	Miles per Hour	Strong[1]	Moderate	Slight[2]		
<2	<4.5	A	A-B	B	--	--
2-3	4.5-7	A-B	B	C	E	F
3-5	7-11	B	B-C	C	D	E
5-6	11-13	C	C-D	D	D	D
>6	>13	C	D	D	D	D

[1]*Sun high in the sky with no clouds*
[2]*Sun low in the sky with no clouds*

- *Precipitation Present.* Precipitation may take the form of hail, mist, rain, sleet, or snow. Indicate "yes" or "no" based on whether there was any precipitation at the time of the accident.

5.6 On-site Impacts - Complete the following about on-site effects.

- *Deaths.* Indicate the number of on-site deaths that are attributed to the accident or mitigation activities. On-site deaths means the number of employees, contract employees, offsite responders, or others (e.g., visitors) who were killed by direct exposure to toxic concentrations, radiant heat, or ovIRPressures from accidental releases or from indirect consequences of a vapor cloud explosion from an accidental release (e.g., flying glass, debris, other projectiles). You should list employee/contractor, offsite responder, and other on-site deaths separately.
- *Injuries.* An injury is any effect that results either from direct exposure to toxic concentrations, radiant heat, or ovIRPressures from accidental releases or from indirect consequences of a vapor cloud explosion (e.g., flying glass, debris, other projectiles) from an accidental release and that requires medical treatment or hospitalization. You should list injuries to employees and contractors, offsite responders, and others separately.
- *Property Damage.* Estimate the value of the equipment or business structures (for your business alone) that were damaged by the accident or mitigation activities. Record the value in American dollars. Insurance claims may provide this information. Do not include any losses that you may have incurred as a result of business interruption.

Incident Investigation Report

SECTION 9: ADDITIONAL INSTRUCTIONS	*This section provides additional guidance for filling in selected items in selected sections of the Incident Investigation Report.*

Guidance for Completing Section 5 - Continued

5.7 Known Offsite Impacts - These are impacts that you know or could reasonably be expected to know of (e.g., from media reports or from reports to your facility) that occurred as a result of the accidental release. You are not required to conduct an additional investigation to determine offsite impacts.

- *Deaths.* Indicate the number of offsite deaths that are attributable to the accident or mitigation activities. Offsite deaths means the number of community members who were killed by direct exposure to toxic concentrations, radiant heat, or ovIRPressures from accidental releases or from indirect consequences of a vapor cloud explosion from an accidental release (e.g., flying glass, debris, other projectiles).
- *Injuries.* Indicate the number of injuries among community members. Injury means any effect that results either from direct exposure to toxic concentrations, radiant heat, or ovIRPressures from accidental releases or from indirect consequences of a vapor cloud explosion from an accidental release (e.g., flying glass. debris, other projectiles) and that requires medical treatment or hospitalization.
- *Evacuated.* Estimate the number of members of the community who were evacuated to prevent exposure that might have resulted from the accident. A total count of the number of people evacuated is preferable to the number of houses evacuated. People who were ordered to move simply to improve access to the site for emergency vehicles are not considered to have been evacuated
- *Sheltered-in-Place.* Estimate the number of members of the community who were sheltered-in-place during the accident. Sheltering-in-place occurs when community members are ordered to remain inside their residence or place of work until the emergency is over to prevent exposure to the effects of the accidental release. Usually these orders are communicated by an emergency broadcast or similar method of mass notification by response agencies.

5.8 Environmental Damage - Indicate whether any environmental damage occurred and specify the type. The damage to be reported is not limited to environmental receptors listed in the rule. Any damage to the environment (e.g., dead or injured animals, defoliation, water contamination) should be identified. You are not, however, required to conduct surveys to determine whether such impact occurred. Types of environmental damage include:

- Fish or animal kills
- Lawn, shrub, or crop damage
- Water contamination
- Soil Contamination
- Other (*specify*)

Incident Investigation Report

SECTION 9: ADDITIONAL INSTRUCTIONS	*This section provides additional guidance for filling in selected items in selected sections of the Incident Investigation Report.*

Guidance for Completing Section 7

7.1 Summary – See instructions in Section 7 of the Incident Investigation Report.

7.2 Changes Introduced as a Result of the Accident - Indicate any measures that you have taken at the facility to prevent recurrence of the accident. Indicate all that apply.

- *Improved/Upgraded Equipment.* A device or piece of equipment that did not function as designed was repaired or replaced.
- *Revised Maintenance.* Maintenance procedures were clarified or changed to ensure appropriate and timely maintenance including inspection and testing (e.g., increasing the frequency of inspection or adding a testing method).
- *Revised Training.* Training programs were clarified or changed to ensure that employees and contract employees are aware of and are practicing correct safety and administrative procedures.
- *Revised Operating Procedures.* Operating procedures were clarified or changed to ensure that employees and contract employees are trained on appropriate operating procedures.
- *New Process Controls.* New process designs and controls were installed to correct problems and prevent recurrence of an accidental release.
- *New Mitigation Systems.* New mitigation systems were initiated to limit the severity of accidental releases.
- *Revised Emergency Response Plan.* The emergency response plan was revised.
- *Changed Process.* Process was altered to reduce the risk (e.g., process chemistry was changed).
- *Reduced Inventory.* Inventory was reduced at the facility to reduce the potential release quantities and the magnitude of the hazard.
- *Other.*
- *None.* No changes initiated at facility as a result of the accident (e.g., because none were necessary or technically feasible). There may be some accidents that could not have been prevented because they were caused by events that are too rare to merit additional steps. For example, if a tornado hit your facility and you are located in an area where tornadoes are very rare, it may not be reasonable to design a "tornado proof" process even if it is technically feasible.

Appendix H – WWTA Organizational Chart

June 11, 2025

Water and Wastewater Treatment Authority
Board of Commissioners

Michael Patrick
Executive Director
(Wastewater Superintendent)

Eric Brooks
Chief Engineer

Natasha Long
Deputy Director of Administration & Public Relations

Peggy Eagle
Senior Accountant

Rodney Ashby
Wastewater Manager
(Rehabilitation & Maintenance)

Larry Mowery
Wastewater Manager
(New Construction)

Vacant
Senior Wastewater Technician

Haley Mundis
Wastewater Technician

Vacant - Plant
Senior Wastewater Technician

Aaron Englund
Sewer Maintenance Technician

Todd Lynn
Project Designer

Shawn Mosley
Sewer Maintenance Technician

Andrew Shepherd
Wastewater Technician

Jon Carter
Sewer Maintenance Technician (Part-Time)

Anthony James
Sewer Maintenance Technician

Blake Adams
Sewer Maintenance Technician

Steven Wright
Wastewater Manager
(PS & Low Pressure Systems)

Kristopher Green
Wastewater Technician

Walter Smith
Sewer Maintenance Technician

Octavio Carranza
Wastewater Technician

Vacant
Sewer Maintenance Technician

Caleb Casey
Project Designer

Joey Lyles
Assistant Wastewater Manager

Jimmy Reece
Wastewater Technician

Eric Sines
Wastewater Technician

Brandon Bryant
Wastewater Technician

Vacant
Assistant Wastewater Manager

Tiffany Summers
Wastewater Technician

Jeff Vinyard
Wastewater Technician

Corey Lewis
Wastewater Technician

Tanea Grajdieru
GIS Specialist

Leslie O'Hare
Geospatial Analyst

Vacant
Intern

Vacant
Intern

Alisha Francois
Grant Compliance Specialist

Kim Gilbert
Wastewater Clerk

Karen Drake
Wastewater Clerk

Kellie Turner
Wastewater Clerk (Part-Time)

Sonya Shannon
Program Coordinator (Billing)

Elvia Basulto
Wastewater Clerk

Felicia Williams
Wastewater Clerk

Lindia Mathis
Wastewater Clerk (Part-Time)

Jasmine McCowan
Accountant

Sylvia Skipper
Wastewater Clerk

Supervisors

Vacant