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

Safe Drinking Water Act (SDWA) section 1433, which was amended by America's Water Infrastructure Act (AWIA) section 2013 in 2018, requires community water systems (CWSs)[1] that serve more than 3,300 people to complete a risk and resilience assessment (RRA) and develop an emergency response plan (ERP). For more information, see www.congress.gov/bill/115th-congress/senate-bill.

Risk and Resilience Assessment (RRA)

RRAs evaluate the vulnerabilities, threats, and consequences from potential hazards. SDWA section 1433 RRAs shall assess the risks to and resilience of specified assets to malevolent acts and natural hazards, including:

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

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

Population Served	Previous RRA Deadline	Next 5-Year Submission Cycle RRA Deadline
≥100,000	March 31, 2020	March 31, 2025
50,000-99,999	December 31, 2020	December 31, 2025
3,301-49,999	June 30, 2021	June 30, 2026

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

Emergency Response Plan (ERP)

No later than six months after certifying completion of its RRA, each CWS must prepare or revise an ERP that incorporates the findings of the assessment. SDWA section 1433 ERPs shall include:

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[1] SDWA section 1433 applies to CWSs. CWSs are drinking water utilities that consistently serve at least 25 people or 15 service connections year-round.

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

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

Population Served	Previous ERP Deadline	Next 5-Year Submission Cycle ERP Deadline
≥100,000	September 30, 2020	September 30, 2025
50,000-99,999	June 30, 2021	June 30, 2026
3,301-49,999	December 31, 2021	December 31, 2026

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

Tools or Methods

SDWA section 1433 does not require the use of any standards, methods, or tools for the RRA or ERP. Your utility is responsible for ensuring that the RRA and ERP address all the criteria in SDWA section 1433(a) and (b), respectively. EPA recommends the use of EPA tools to facilitate sound RRAs and ERPs. For the RRA, EPA has created the Vulnerability Self-Assessment Tool Web 3.0, the Baseline Information on Malevolent Acts for CWSs, and the Small System Risk and Resilience Assessment Checklist. EPA created the Emergency Response Plan Template and Guidance to support compliance with the ERP requirements.

Frequently Asked Questions

How does a wholesale or consecutive CWS calculate its population served with respect to SDWA section 1433 RRA and ERP requirements?
When determining population served, wholesale or consecutive CWSs should account for (i.e., include) the population served of the community or communities to which they serve water. If you have any questions about whether your CWS must comply with SDWA section 1433 due to its population served, please email EPA at dwresilience@epa.gov.

Who should I work with when creating my RRA and ERP?
Utilities shall, to the extent possible, coordinate the RRAs and ERPs with local emergency planning committees.

Who can certify my RRA and ERP?
RRAs and ERPs can be self-certified by the utility. The certifying official should be a utility employee. Beyond that, each utility should designate a certifying official.

How do I submit my certification?
Three options are available for submittal: regular mail, email, and an online portal (user-friendly and secure). The online submission portal will provide a receipt of submittal; EPA recommends using this method. Please visit

EPA's How to Certify webpage for more information on how to certify.

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

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

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

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

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

No. SDWA section 1433 does not require utilities to submit the certification to state or local governments.

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

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

Still have questions about SDWA section 1433 RRA and ERP requirements?

Contact EPA with SDWA section 1433 related questions at dwresilience@epa.gov.

Please visit EPA's website, www.epa.gov/waterresilience/awia-section-2013, for more in-depth information on the following topics:
- Certification Deadlines
- RRA Requirements and Assistance Resources for CWSs that Serve More than 3,300
- ERP Requirements and Assistance Resources for CWSs that Serve More than 3,300
- Recursos de AWIA en Español
- Certification Process
- Compliance Data
- Third-Party Standards
- Resources to Promote RRAs and ERPs for CWSs that Serve Less than 3,301, non-CWSs, and Wastewater Systems
- Final Disposition of Bioterrorism Act Vulnerability Assessments
- Workshops
- Frequently Asked Questions
- Fact Sheet
- Resources for Technical Assistance Providers
- Five-year Review, Revision and Certification Requirements