

MEETING DATE

CITY OF LAKE CITY

Report to Council

COUNCIL AGENDA	
SECTION	
ITEM NO.	

SUBJECT: Task Assignment for ERP Update

DEPT / OFFICE: Utilities / Water Treatment Plant

Originator: Michael L. Osborn		
City Manager Don Rosenthal	Department Director Steve Brown	Date 10/22/25
Recommended Action: Council approve task for Jones Edmunds to provide an Emergency Response Plan Update		
Summary Explanation & Background: <p>U.S. EPA has launched the second round of America's Water Infrastructure Act (AWIA) Section 2013 / Safe Drinking Water Act (SDWA) section 1433, which requires community drinking water systems (CWSs) serving more than 3,300 people to update risk and resilience assessments (RRAs) and emergency response plans (ERPs) every five years.</p> <p>The Price Creek Water Treatment Plant (WTP) is looking to start this process to complete these requirements within the required timelines. The first part is the (RRA) which was completed in Sept 2025. Now we are looking to finish the (ERP) which is covered with this Scope of Service.</p>		
Alternatives: None		
Source of Funds: 410.72.536-030.31		
Financial Impact: \$39,900.00 this money was budgeted and is available for use in the WTP budget.		
Exhibits Attached: 1) Jones Edmunds Scope of Service		

UTILITY EMERGENCY RESPONSE PLAN UPDATE

PREPARED FOR: Michael L. Osborn, Jr., CSM, CPM, DW "A"
Director of Water Treatment
692 SW Saint Margarets Street
Lake City, Florida 32025

DATE: October 20, 2025

SUBJECT: AWIA ERP Update – Scope and Fee

PROJECT BACKGROUND

In compliance with the requirements of America's Water Infrastructure Act of 2018 (AWIA), Jones Edmunds assisted the City of Lake City (City) in developing a Risk and Resilience Assessment (RRA) for its potable water system. The final RRA was certified to the Administrator of the U.S. Environmental Protection Agency (EPA) in compliance with the AWIA June 30, 2021 requirement. The RRA culminated with the development of an Implementation Plan for capital and operational needs for risk and resilience management of the water system.

In addition, in accordance with the requirements of AWIA, Jones Edmunds subsequently assisted Lake City in updating its Emergency Response Plan (ERP). The ERP was updated to include elements related to improving the resiliency of the water system, as well as response measures in the event of a malevolent act or natural hazard that threatens the ability of the community water system to deliver safe drinking water. The ERP was certified to the EPA in compliance with the AWIA December 31, 2021 requirement.

AWIA requires each community water system to then review its RRA at least once every five years to determine if it should be revised. Upon completion of such a review, the system must submit to the EPA a certification that it has reviewed its RRA and revised it, if applicable. In addition, each community water system must review and, if necessary, revise its ERP at least once every five years after the system completes the required review of its RRA. The ERP must incorporate any revisions to the RRA. Upon completion of such a review, but not later than six months after certifying the RRA, the system must submit to the EPA a certification that it has reviewed its ERP and revised it as well, if applicable. The deadlines for submitting certifications for the RRA and ERP reviews/updates are June 30, 2026, and December 31, 2026, respectively.

Jones Edmunds recently assisted the City in updating its RRA. This work will allow the City to certify the final Updated RRA to the Administrator of the U.S. Environmental Protection Agency (EPA) in compliance with the AWIA June 30, 2026, requirements.

In follow-up, the City has requested Jones Edmunds' assistance in updating its ERP. The ERP must contain the following elements:

- Strategies and resources to improve the resilience of the system, including the physical security and cybersecurity of the system;
- Plans and procedures that can be implemented, and identification of equipment that can be utilized, in the event of a malevolent act or natural hazard that threatens the ability of the community water system to deliver safe drinking water;
- Actions, procedures, and equipment which can obviate or significantly lessen the impact of a malevolent act or natural hazard on the public health and the safety and supply of drinking water provided to communities and individuals, including the development of alternative source water options, relocation of water intakes, and construction of flood protection barriers; and
- Strategies that can be used to aid in the detection of malevolent acts or natural hazards that threaten the security or resilience of the system.

The City's ERP has been developed based on existing emergency plans such as the Hurricane Plan but is required to include response protocols for any type of emergency or event identified as a threat in the RRA. The format for the ERP is based on industry standards including the Federal Emergency Management Agency Comprehensive Preparedness Guide (CPG 101) and the American Water Works Association guidance M19 Emergency Planning for Water and Wastewater Utilities.

As part of these efforts, the City wants to proactively comply with an additional regulatory requirement that applies to the City's water treatment facility. The new regulation requires certain facilities to develop facility response plans for a worse-case discharge of Clean Water Act (CWA) hazardous substances, or threat of such a discharge. A worst-case discharge is the largest foreseeable discharge in adverse weather conditions, including extreme weather conditions due to climate change. Facilities subject to the rule are required to prepare response plans in the event of worst-case discharges, or threat of such discharges, and submit them to EPA.

The facility response plan requirements apply to facilities that could reasonably be expected to cause substantial harm to the environment, based on their location. These include facilities with a maximum onsite quantity of a CWA hazardous substance that meets or exceeds threshold quantities, located within a 0.5-mile radius of navigable water or conveyance to navigable water, and that meets one or more substantial harm criteria. Regulated facilities are required to submit response plans to EPA by May 28, 2027.

SCOPE OF SERVICES

EMERGENCY RESPONSE PLAN UPDATE

TASK 1 – KICKOFF MEETING AND EXISTING ERP AND DOCUMENT REVIEW

Kickoff Meeting: During the kickoff meeting the CONSULTANT and CITY staff will establish the goals, expectations and metrics, and project logistics for Phase 2; identify appropriate members for the CITY's ERP Team (which may include representatives from outside agencies such as City/County emergency management, police, fire, HAZMAT, Department of Environmental Protection, and others related to emergency response); review threats from the risk assessment and mitigation measures which may include development of incident specific response plan; discuss utility background/history in emergencies and emergency exercises; identify documents to fit under the ERP umbrella for ease of use and update; and discuss industry standards for ERP, specific information for the ERP document, and submit a data request list. Particular focus will be placed on the impact to the ERP of the updates to the RRA.

In addition, specific discussion will be held regarding CWA hazardous substances stored at the WTP that meet or exceed threshold quantities, located within a 0.5-mile radius of navigable water or conveyance to navigable water, and that meets one or more substantial harm criteria.

Data Collection and Review: CONSULTANT will review the documents provided by the CITY to identify data gaps and assist in collecting other local, regional, and state resources to supplement the CITY's information. This includes the CITY's related plans and response procedures such as the following documents:

- Existing Emergency Response Plan,
- Emergency planning/response policies and procedures,
- Training and exercise plans,
- Equipment lists,
- Community emergency operations plans,
- Mutual aid agreements, and
- Emergency Communications Plan.

Deliverables: CONSULTANT will prepare an agenda, meeting materials, and meeting minutes for distribution to the CITY staff as documentation of proceedings. Electronic copies of the meeting minutes will be provided within two weeks of the meeting completion. A draft table of contents for the ERP document will be submitted for this task.

TASK 2 – STAFF INTERVIEWS, ACTION CHECKLISTS, AND WORKSHOP 1

CONSULTANT will conduct staff interviews to develop and update the Utility's Incident Management Team (IMT) and Emergency Action Levels (EALs). During Workshop 1, CONSULTANT and CITY's ERP Team will designate the incident management team, including identifying three people for each role. The CONSULTANT and ERP Team will develop and discuss incident action checklists (IACs) for threats/hazards identified in the RRA process as relevant to the CITY. These checklists may include actions for mitigation, preparedness,

response, and recovery phases of an emergency. Up to 8 IACs will be developed based on the threats identified in the Updated RRA.

Deliverables: CONSULTANT will prepare an agenda, meeting materials, and meeting minutes for distribution to CITY staff as documentation of the preceding. Electronic copies of the meeting minutes will be provided within two weeks of each workshop completion. The IACs will be included in the draft ERP.

TASK 3 – DRAFT AND FINAL ERP UPDATE AND WORKSHOP 2

CONSULTANT will develop the draft ERP Update using guidance from USEPA, AWWA, FEMA, and the National Incident Management System/Incident Command System (NIMS/ICS) and data collected during site visits and interviews. CONSULTANT will include information from the existing CITY emergency response plan for the water system and append these to the updated ERP. The draft update is expected to include updates to the following components.

- Site Specific Information
- Roles and Responsibilities
- Core and Incident Specific Response Plans
- Communication Procedures
- Mitigation Strategies
- Training

Additionally, in compliance with Clean Water Act (CWA) hazardous substances regulations, response plans will be included to address worse-case discharges of chemicals stored at the WTP in quantities above the CWA threshold quantities. It is anticipated that this will include sodium hypochlorite.

The Draft ERP Update will be reviewed during Workshop 2 with the CITY ERP Team. CONSULTANT and CITY staff will discuss the CITY's comments and address data gaps (if any) to refine the ERP contents, communication protocols, and contact list. CONSULTANT and CITY staff will also determine the access rights for each incident-specific response procedure for CITY staff. CONSULTANT will update the draft ERP document and issue a final copy to the City.

Deliverables: The draft report will be delivered electronically for the City review. Up to 5 hard copies (available upon request) and an electronic version of the Final ERP Update will be submitted to the City Project Manager.

ASSUMPTIONS

- The CITY is responsible for coordinating with all CITY staff and personnel who should be involved in the assessment including non-utility staff (such as from police or fire departments).
- It is assumed that up to 8 City employees will attend 2, one-hour workshops.
- CONSULTANT will provide up to 3 attendees during the workshops, interviews, and meetings.
- Existing documents will be provided by the CITY in electronic files which can be used in the ERP. If needed, CONSULTANT will review sensitive documents in the CITY's office.
- If CITY specific documents are not available for update, the CONSULTANT will use industry-standard incident action checklists for natural hazards and emergency response plans for drinking water systems.
- The CITY will provide an updated contact list for incorporation into the updated ERP.
- CONSULTANT's role is to facilitate and document the process. All decisions will be made by the CITY. As a result, the ERP is not a signed-and-sealed document.
- The CITY will submit the required certifications by letter, email, or electronic submission to the EPA Administrator, following completion of the ERP.

SCHEDULE

The City's ERP certification must be completed by December 30, 2026. Jones Edmunds estimates that this project can be completed in 3 months following Notice to Proceed. A detailed Project Schedule with milestone deliverables and proposed meetings and workshops will be submitted to the City following the kickoff meeting.

COMPENSATION

Jones Edmunds proposes to complete the Scope of Services outlined above for a not-to-exceed lump-sum fee of \$39,900. Services will be billed monthly on a percent-complete basis by Task. The table below provides the breakdown of the Task Fees.

Tasks	Fee
Task 1: Kickoff Meeting and Existing ERP and Document Review	\$9,200
Task 2: Staff Interviews, Action Checklists and Workshop 1	\$9,900
Task 3: Draft and Final ERP and Workshop 2	\$20,800
Total	\$39,900