3) Vulnerability Assessment Checklist for Small Wastewater Systems

Assets

Communities have a number of assets in their wastewater system. Some of these assets are physical, such as in the collection system and treatment works. Equally important to the successful operation of the facility are investments made in the knowledge of the system, and people assets, (both personnel and customer) which are necessary to the system. This vulnerability assessment checklist is designed to help you identify potential areas of vulnerability associated with these assets and appropriate actions that can be taken to minimize the vulnerabilities identified.

Complete this assessment in the following way:

- A. Review each question, and mark the appropriate answer. Indicate N/A for questions that aren't applicable to your system. Blank spaces are provided for you to fill in questions, comments, and/or potential corrective actions that apply to your system, but were not included on the checklist.
- B. Review the comments as you respond to each question.
- C. Fill in potential corrective actions in the last column for each case in which you answer "No."

It is important to complete the entire table (A, B, and C) – it will make prioritization much easier in the next step.

Knowledge Assets

Knowledge assets include information on critical records and documents, as well as information technology.

Critical Records and Documents

QUESTION	ANSWER	COMMENT	POTENTIAL CORRECTIVE ACTIONS
Example 1) Do you have a written emergency response plan (ERP)?	O Yes O No O N/A	It is essential that you have an ERP. There are a number of federal and state regulations that require ERPs. You may contact your State Emergency Response Commission or Local Emergency Planning Committee (LEPC).	 a. Obtain sample ERP. Gather and review any plans we have from other requirements. Review inventory to identify specific issues. Gather and review contact lists. b. Meet with local first responders (police, fire, emergency medical service) and LEPC to receive input.

vulnerabilities

QUESTION	ANSWER	COMMENT	PO
1.) Do you have a written emergency response plan (ERP)?	O Yes O No O N/A	It is essential that you have an ERP. There are a number of federal and state regulations that require ERPs. You may contact local emergency response professionals, your Local Emergency Planning Committee (LEPC), and/or your State Emergency Response Commission for assistance. You may also contact NETCSC if you cannot find assistance locally. Be certain that the ERP is specifically for your facility, and not a generic one for your community. In addition to responding to an emergency, ERPs should include procedures for inspection and start-up after an event.	a. b.
		Your plan should be reviewed at least annually to ensure it is up-to-date and addresses a full range of potential threats, including flooding, other natural disasters, and security breaches such as terrorism and other forms of unauthorized entry. These plans could pose a security risk if posted for public viewing since it gives people	c.

POTENTIAL CORRECTIVE ACTIONS



QUESTION	ANSWER	COMMENT	POTENTIAL CORRECTIVE ACTIONS
		information that could be used against the system.	d.
		Only share the ERP with those who have a clear need to know what is	e.
		in it, such as local first responders (police, fire, emergency medical) and your Local Emergency Planning Committee.	f.
2.) Do you have a detailed emergency contact list?	O Yes O No O N/A	An important step in developing your ERP is to create an Emergency Contact List (Attachment 1). Designate someone to be contacted	a.
		in case of emergency regardless of the day of the week or time of day. This contact information should be	b.
		kept up-to-date and made available to wastewater system personnel, local officials, local first responders and the LEPC.	c.



QUESTION	ANSWER	COMMENT	POTENTIAL CORRECTIVE ACTIONS
3.) Do you have a plan to test your ERP and contact list at least annually?	O Yes O No O N/A	Work with your local first responders to plan an exercise that involves your system. You want to	a.
		be sure to get to know the first responders before an emergency develops. Consider verifying the	b.
		contact list at least quarterly.	c.
4.) Are maps, records, and other information stored in	O Yes O No	Records, maps, and other information should be stored in a secure	a.
a secure location?	O N/A	location when not in use.	



Make back-up copies of all data and b.

c.

sensitive documents on a regular basis. Store in a secure off-site loca-

tion.

QUESTION	ANSWER	COMMENT	POTENTIAL CORRECTIVE ACTIONS	
5.) Do you have a policy for the release of copies of	O Yes O No	Decision makers need to address how sensitive documents (e.g.,	a.	
records, drawings, maps, and other sensitive information?	O N/A	schematics, maps, and plans and specifications) will be distributed for construction projects or other	b.	
		uses, and how they will be recorded and recovered after use. Discuss measures to safeguard your docu- ments with bidders for new proj- ects.	c.	
Are there additional vulnerab	ilities?			A
6.)	O Yes O No O N/A		a.	
	O N/A		b.	
			c.	
7.)	O Yes O No		a.	
	O N/A		b.	
			c.	

Information Technology

Computers and computerized controls like a Supervisory Control and Data Acquisition (SCADA) system are becoming more common in small wastewater systems, and can be vulnerable to all sorts of problems. If computers are used as part of the wastewater system, be certain these protective measures are in place, if applicable.

QUESTION	ANSWER	COMMENT	POTENTIAL CORRECTIVE ACTIONS
8.) Is computer access password protected?	O Yes O No O N/A	All computer access should be password protected and passwords changed every 90 days and (as	a.
		needed) following employee turnover. When possible, each individual should have a unique	b.
		password that they do not share with others.	c.
9.) Is virus protection installed and software upgraded regularly?	O Yes O No O N/A	Consider contacting an electronic virus protection company and subscribing to a virus update program	a.
		to protect your records. Update	b.

virus protection weekly.



OLIEGTION	ANTONIED		
QUESTION	ANSWER	COMMENT	POTENTIAL CORRECTIVE ACTIONS
10.) Do you have Internet firewall software installed on your computer?	O Yes O No O N/A	If you have Internet access, a fire- wall protection program should be installed to prevent outside access	a.
		to your computer. If you have a SCADA system, consider operating it on systems without internet	b.
		access to reduce the chance of unauthorized access.	c.
		Be aware that firewall protection software will probably not protect modem connections. If a modem must be used, be certain to have	
		software that will disable the local network connection when the modem is not in use.	
11.) Do you have a plan to back up your computer data?	O Yes O No O N/A	Backing up data regularly (i.e. daily) will help prevent the loss of data in the event of power outages	a.
		or damage to the computer. Backup copies of computer data should be made routinely and	b.
		stored at a secure off-site location. Use of surge protectors can help to reduce damage to computers.	c.



QUESTION	ANSWER	COMMENT	POTENTIAL CORRECTIVE ACTIONS
12.) Is there information on the Web that can be used to disrupt your system?	O Yes O No O N/A	Posting detailed information about your wastewater system on a Web site may make the system more vul-	a.
		nerable to attack. Web sites should be examined to determine whether they contain critical information	b.
		that should be removed.	c.
13.) If you have a SCADA system, has it been evaluated for weaknesses and hard-	O Yes O No O N/A	SCADA can be vulnerable to potential intruders. The most direct approach to evaluate vulnera-	a.
ened?		bilities is penetration testing. Penetration testing can detect vulnerability and security breaches that	b.
		could be used to attack and pene- trate the entire SCADA system. Hardening is the process of making	c.
		the system less vulnerable through equipment upgrades, redundancy of	



components, etc.

QUESTION	ANSWER	COMMENT	POTENTIAL CORRECTIVE ACTIONS	
14.) Are your computers and information management systems located in	O Yes O No O N/A	Like many other assets, computers and information systems can be damaged during natural disasters,	a.	
places where they are least likely to be affected by nat- ural disasters (floods,	OTWA	such as floods and storms. As you make decisions regarding the placement of SCADA system technolo-	b.	
storms, etc.)?		gies and other information management equipment, consider asset safety as well as convenience of use.	c.	
Are there additional vulnera				
15.)	O Yes O No		a.	
	O N/A		b.	
			c.	
16.)	O Yes		a.	
	O No O N/A		b.	
			c.	

Physical Assets

Physical assets include the collection system, treatment facility, and hazardous material storage. Each of these assets have specific vulnerabilities. Perimeter and access control are common issues in each case.

Perimeter and Access Control

Fermieter and Access Co	onuoi		
QUESTION	ANSWER	COMMENT	POTENTIAL CORRECTIVE ACTIONS
17.) Is access to the critical components of the wastewater system restricted to authorized personnel only?	O Yes O No O N/A	Restrict access to the critical components of your wastewater system to authorized personnel only, and make sure that system staff understand and abide by the access policies that are established. Consider the following: • Issue wastewater system photo identification cards for employees. • Post signs restricting entry to authorized personnel and ensure that assigned staff escort people	a. b.

without proper ID.

QUESTION	ANSWER	COMMENT	POTENTIAL CORRECTIVE ACTIONS
18.) Are facilities appropriately secured or protected from unauthorized entry?	O Yes O No O N/A	Ideally, all facilities should have a security fence around the perimeter. The fence perimeter should be walked periodically to check for	a.
		breaches and maintenance needs. Lock all doors and windows. All gates should be locked with chains and a tamper-resistant padlock.	b.
		Other barriers such as concrete "jersey" barriers can be considered to guard certain critical components from accidental or intentional vehi-	c.
		cle intrusion. Systems should ensure that all security measures comply with fire codes.	
19.) Are fill and vent pipes on storage or process tanks secure?	O Yes O No O N/A	Evaluate access to storage and process tanks to reduce theft of fuel or chemicals, or tampering with	a.
		treatment processes. This is particularly important on critical components (such as digesters) and remote	b.
		areas with limited surveillance or perimeter protection.	c.



QUESTION	ANSWER	COMMENT	POTENTIAL CORRECTIVE ACTIONS
20.) Is there external lighting around the critical components of your wastewater	O Yes O No O N/A	Adequate lighting of the exterior of wastewater systems' critical components is a good deterrent to unau-	a.
system?		thorized access and may result in the detection or deterrence of tres- passers. Motion detectors that acti-	b.
		vate switches that turn lights on or trigger alarms also enhance security.	c.
21.) Are warning signs (against tampering, unauthorized access, etc.) posted	O Yes O No O N/A	Warning signs can be an effective means to deter unauthorized access. Examples include the following:	a.
on all critical components of your wastewater system?	0 1 111	"Warning - Tampering with this facility is prohibited"; "Keep Out", "Authorized Personnel Only,"	b.
		"Unauthorized Access Prohibited," and "Employees Only".	c.
		Check regularly to be certain signs are present and legible.	



QUESTION	ANSWER	COMMENT	POTENTIAL CORRECTIVE ACTIONS
22.) Do you regularly visit all buildings, lift stations, equipment, and other critical components?	O Yes O No O N/A	Frequent and random patrolling of the wastewater system by utility staff may discourage potential tam- pering. It may also help identify problems that may have arisen since the previous patrol.	a. b.
		Consider asking your local law enforcement agencies to conduct patrols of your wastewater system. Advise them of your critical components and explain why they are important.	c.
23.) Is the area around the critical components of your wastewater system free of objects that may be used for breaking and entering?	O Yes O No O N/A	When assessing the area around your wastewater system's critical components, look for objects that could be used to gain entry (e.g., large rocks, cement blocks, pieces of wood, ladders, valve keys, and other tools) and remove if possible.	a. b. c.



QUESTION	ANSWER	COMMENT	POTENTIAL CORRECTIVE ACTIONS
24.) Are potential entry points to your wastewater system easily seen?	O Yes O No O N/A	You should clear fence lines of all vegetation. Overhanging or nearby trees may also provide easy access. Avoid landscaping that will permit trespassers to hide or conduct unnoticed suspicious activities. Trim trees and shrubs to enhance the visibility of your wastewater system's critical components. If possible, park vehicles and equipment in places where they do not block view of your wastewater system's critical components.	a. b.

QUESTION	ANSWER	COMMENT	POTENTIAL CORRECTIVE ACTIONS
25.) Do you have an alarm system that will detect O No unauthorized entry or attempted entry at critical components?		Consider installing an alarm system that notifies the proper authorities or your wastewater system's designated contact for emergencies when there has been a breach of security. Consider an alarm system whenever possible for tanks, pump houses, and treatment facilities.	a.
		Also consider having an audible alarm at the site as a deterrent and to notify neighbors of a potential threat.	b.
		Alarms can also be incorporated for use with SCADA systems. You may want to consult with the local law enforcement agency about selecting an alarm system.	

OUESTION	ANSWER	COMMENT	POTENTIAL CORRECTIVE ACTIONS
QUESTION 26.) Do you have a key control and accountability policy?	ANSWER O Yes O No O N/A	Keep a record of locks and associated keys, and to whom the keys have been assigned. This record will facilitate lock replacement and key management (e.g., after employee turnover or loss of keys). Vehicle and building keys should be kept in a lockbox when not in use. Have all keys stamped (engraved) "DO NOT DUPLICATE."	a. b. c.
27.) Are entry codes and keys limited to authorized personnel only?	O Yes O No O N/A	Suppliers and personnel from colocated organizations should be denied access to codes and/or keys. Change codes frequently if possible. Entry into buildings should be under the direct control of wastewater system personnel.	a. b. c.



QUESTION	ANSWER	COMMENT	POTENTIAL CORRECTIVE ACTIONS
28.) Do you have a neighborhood watch program for your wastewater system?	O Yes O No O N/A	Watchful neighbors can be very helpful to a security program. Make sure they know whom to call	a.
		in the event of an emergency or suspicious activity. Work with your local law enforcement agency to	b.
		establish such a program.	c.
29.) Are vehicles locked and secured when unattended?	O Yes O No O N/A	Wastewater system vehicles should be locked when they are not in use or left unattended. Remove any	a.
	O IV/A	critical information about the system before parking vehicles for the night or leaving them unattended.	b.
		Vehicles usually contain tools that could be used to access critical com-	c.



ponents of your wastewater system. Secure and account for tools daily.

QUESTION	ANSWER	COMMENT	POTENTIAL CORRECTIVE ACTIONS
Are there additional vu	ılnerabilities?		
30.)	O Yes O No		a.
	O N/A		b.
			c.
31.)	O Yes O No		a.
	O N/A		b.
			c.

Hazardous Material Control

Chlorine and other hazardous materials create vulnerabilities that can affect personnel, the public, and the environment.

QUESTION	ANSWER	COMMENT	POTENTIAL CORRECTIVE ACTIONS
32.) Are material safety data sheets (MSDS) available for each chemical?	O Yes O No O N/A	Establish a plan for maintaining MSDS information for every chemical/material used throughout the	a.
		system. Employees should have immediate access to this information, and be trained in using	b.
		MSDSs.	c.
33.) Are all hazards from chemicals used identified and labeled?	O Yes O No O N/A	Use the National Fire Protection Association (NFPA) labeling system or other suitable system for labeling	a.
		hazards. Consult each MSDS for hazard information, and conduct inspections of chemicals, contain-	b.

ers, and hazardous material storage areas regularly to identify potential problems. Proper management of hazardous chemicals can often be accomplished with little additional expense, and add an essential level

of safety.



Provide the local fire department and the local emergency planning committee with information about the types and locations of hazardous	a.
the types and locations of hazardous	
materials used in your wastewater system. Updates should be provid-	b.
ed annually, but if there is a significant change, notify the authorities immediately.	c.
Treatment plant personnel and processes may be impacted by hazardous materials released by sabo-	a.
tage or accidents. Contact your LEPC and/or commercial and industrial customers for informa-	b.
tion regarding hazardous materials used by local industries.	c.
include actions necessary to protect	
	processes may be impacted by hazardous materials released by sabotage or accidents. Contact your LEPC and/or commercial and industrial customers for information regarding hazardous materials used by local industries. Emergency response plans should



QUESTION	ANSWER	COMMENT	POTENTIAL CORRECTIVE ACTIONS
36.) Have you reviewed your pretreatment ordinance this past year?	O Yes O No O N/A	Pretreatment ordinances enable the system to regulate the inputs from commercial and industrial users.	a.
. ,		High strength organic wastes, oil, grease, heavy metals and hazardous materials can have negative effects	b.
		on your system. Users with such wastes should pretreat or implement waste minimization techniques.	c.
37.) Are employees properly trained and equipped to respond to a hazardous	O Yes O No O N/A	Evaluate all procedures for training and response to hazardous materials released to the collection system or	a.
materials release into the collection system?		treatment works. Consider protection of personnel and community, and mitigation procedures.	b.
		Equipment and procedures necessary to respond to a release may be found in the MSDS information.	c.
		NEVER RESPOND to a release for which you are not properly trained or equipped. Coordinate training with local emergency response per- sonnel.	



QUESTION	ANSWER	COMMENT	POTENTIAL CORRECTIVE ACTIONS
38.) Are deliveries of chemicals and other supplies made in the presence of	O Yes O No O N/A	Establish a policy that an authorized person, designated by the wastewater system, must accompa-	a.
wastewater system person- nel?	OTWI	ny all deliveries. Verify the credentials of all drivers. This prevents unauthorized personnel from hav-	b.
		ing access to the wastewater system.	c.
39.) Have you discussed with your supplier(s) proce-	O Yes O No	Chain of custody procedures for delivery of chemicals should be	a.
dures to ensure the security of their products?	O N/A	reviewed. Inspect chemicals and other supplies at the time of deliv- ery to verify they are sealed and in unopened containers. Match all	b.
		delivered goods with purchase orders to ensure that they were, in fact, ordered by your wastewater system.	c.
		Keep a log or journal of deliveries. It should include the driver's name (taken from the driver's photo I.D.), date, time, material delivered, and the supplier's name.	



QUESTION	ANSWER	COMMENT	POTENTIAL CORRECTIVE ACTIONS
40.) Are chemicals, particularly those that are potentially hazardous or flamma-	O Yes O No O N/A	All chemicals are to be stored in an appropriate area. Check the MSDS for storage guidelines. The area	a.
ble, properly stored in a secure area?		should be secure with access restricted to authorized employees. Be certain that the area is properly	b.
		ventilated for the materials being stored.	c.
		Maintain appropriate tools and equipment on site (properly rated	
		fire extinguisher, chlorine kit, etc.) to take immediate actions in	
		response to an emergency. Check the MSDS for guidance on the proper equipment and response.	

QUESTION	ANSWER	COMMENT	POTENTIAL CORRECTIVE AG	CTIONS
Are there additional v	ulnerabilities?			
41.)	O Yes O No O N/A		a.	
	OWA		b.	
			c.	
42.)	O Yes O No		a.	
	O N/A		b.	
			c.	

Treatment Facilities

The treatment systems in small communities range from one-cell lagoons to relatively complex mechanical systems. More complex systems may require additional measures to ensure protection of their components.

QUESTION	ANSWER	COMMENT	POTENTIAL CORRECTIVE ACTIONS
43.) Do you monitor raw and treated wastewater so that you can detect changes in water quality?	O Yes O No O N/A	Monitoring of raw and treated wastewater can establish a baseline that may allow you to know if there has been a contamination incident.	a.
		Personnel should be trained to notice any abnormal odor or color of the wastewater entering the plant.	b.
		It may be appropriate to monitor raw wastewater for pH, DO, COD. These parameters can help identify indicators of excessive organic loading or toxic inputs to the system.	c.
		Routine parameters for monitoring treated wastewater include chlorine residual, fecal coliform, and pH.	

_			
QUESTION	ANSWER	COMMENT	POTENTIAL CORRECTIVE ACTIONS
44.) Are there procedures in place to control septage dumps?	O Yes O No O N/A	Septage haulers should only be allowed to dump when regular personnel are on duty. Septage must	a.
-		be sampled and tested for compati- bility. Record all septage dumps, including: amount, sample results,	b.
		company/hauler, date, time and location of dump.	c.
45.) Are personnel identified and available who can	O Yes O No	Be certain that all backup personnel are familiar with the controls of all	a.
operate all critical components during an emergency?	O N/A	critical components, in the event that regular operators are unavail- able. Also consider other potential routes of access to the facility(s) if	b.



regular access roads are unavailable

during an emergency.

QUESTION	ANSWER	COMMENT	POTENTIAL CORRECTIVE ACTIONS
46.) Are fire extinguishers and other emergency equipment adequate and up to date?	O Yes O No O N/A	Appropriate fire extinguishers should be located throughout your facility. Check material safety data sheets to determine the most appropriate fire extinguisher. Contact your local fire department for consultation on local standards. Be certain that all personnel are familiar with their use. Life preservers and any other appropriate flotation devices should also be available for	a. b. c.
47. Is personal safety equipment available for all necessary jobs?	O Yes O No O N/A	There are many types of safety equipment that may be necessary for the treatment facility and collection system. Confined space entry equipment (winches, gas monitors, etc.), respirators, and protection for eyes, ears, hands, and feet are essential for safely completing some tasks.	a. b. c.



QUESTION	ANSWER	COMMENT	POTENTIAL CORRECTIVE ACTIONS
48.) Are emergency power supplies available to operate critical processes during an	O Yes O No O N/A	Emergency back-up generators should be available and tested under load each month to verify	a.
emergency?		operation. Whenever possible, power supplies should be located in places where they are least likely to	b.
		be affected by natural disasters (floods, storms, etc.).	c.
49.) Do you have a preventive maintenance program?	O Yes O No O N/A	Good equipment maintenance is essential to protecting system resources. Be sure that generators,	a.
		emergency pumps, valves, etc. are maintained regularly. Proper polar- ity and grounding of electrical sys-	b.
		tems should be verified regularly.	c.
		There are simple computer programs available to help you develop a preventative maintenance program.	



QUESTION	ANSWER	COMMENT	POTENTIAL CORRECTIVE ACTION	ONS
Are there additional vu	Ilnerabilities?			
50.)	O Yes O No		a.	
	O N/A			
			b.	
			c.	
				`
1.) O Yes O No O N/A	O No		a.	
		b.		
			c.	

Collection

Collection systems are usually the most expensive portion of a treatment system, and are vulnerable to a variety of problems. Proper maintenance is essential to help protect this resource.

QUESTION	ANSWER	COMMENT	POTENTIAL CORRECTIVE ACTIONS
52.) Are access points in critical areas (i.e., industry, commerce districts, schools) protected?	O Yes O No O N/A	Disruption of services to critical customers can cause serious problems within the community. Access to collection systems from points	a. b.
, resistant		nearby or within these facilities should be protected. Tamper-resist-	
		ant bolts or other methods may be used to secure manhole covers to rims. Protection of the collection system should also be considered in your ERP.	c.
53.) Are lift stations secured to prevent unauthorized access?	O Yes O No O N/A	Disabled lift stations can create many problems in the wastewater system. Secure access points and	a.
		control panels at lift stations with tamper-resistant locks. Protect structures from collision with con-	b.
		crete ballards or jersey barriers. Install alarms on lift stations that lack them. Test alarms regularly.	c.

QUESTION	ANSWER	COMMENT	POTENTIAL CORRECTIVE ACTIONS
54.) Are storm sewer outfalls secured?	O Yes O No O N/A	Combined sewer and storm-water sewer outfalls may provide access to other portions of the collection sys-	a.
		tem. When possible and appropriate, access to these components should be restricted in ways that do	b.
		not disrupt flow from the outfall.	c.
55.) Do you routinely clean and maintain your collection system?	O Yes O No O N/A	Regular maintenance of the collec- tion system will reduce blockages and emergency call-outs, and	a.



increase the life of collection system b.

c.

components. Water jet and vacu-

um debris from lines.

QUESTION	ANSWER	COMMENT	POTENTIAL CORRECTIVE ACTIONS
56.) Do you have a collection system inspection program?	O Yes O No O N/A	Periodically inspect collection systems by video camera or smoke testing. Inspect manholes and	a.
		clean-outs annually.	b.
		Repair inflow and infiltration problems as much as possible.	c.
57.) Have you identified sources for obtaining emergency pumps or cleaning	O Yes O No O N/A	Identify alternate sources for obtaining emergency equipment from a neighboring community or	a.

contractor. Be certain to maintain

and periodically test equipment owned by the community.

b.

c.

equipment?



QUESTION	ANSWER	COMMENT	POTENTIAL CORRECTIVE ACTIONS
58.) Are tributary collection systems from neighboring entities secure?	O Yes O No O N/A	Coordinate with other jurisdictions whose collection systems connect with your system. Vulnerabilities in neighboring systems can be vulnerabilities in your system.	a. b.
		onities in your system.	c.
59.) Are employees trained	O Yes	All wastewater system employees	a.
to recognize vulnerable points in the collection sys-	O No O N/A	should be trained to recognize abnormalities in wastewater charac-	a.
tem?		teristics, vulnerable access points, inflow, infiltration, or other areas of concern.	b.



QUESTION	ANSWER	COMMENT	POTENTIAL CORRECTIVE ACTIONS
Are there additional vu	lnerabilities?		
60.)	O Yes O No O N/A		a.
	OWA		b.
			c.
51.)	O Yes O No		a.
O N/A		b.	
			c.

Customer/People Assets

Personnel

Personnel are the greatest asset to a community's wastewater system. Personnel policies are essential to protect both the interests of employees and the community.

QUESTION

62.) When hiring personnel do you request that appropriate authorities perform a criminal background check, and do you verify employment eligibility as required by the Immigration and Naturalization Service, or other government authorities

ANSWER

O Yes O No O N/A

COMMENT

It is good practice to have all job candidates fill out an employment application. Always verify professional references. Background checks conducted during the hiring process may prevent potential employee-related security issues.

POTENTIAL CORRECTIVE ACTIONS

b.

a.



QUESTION	ANSWER	COMMENT	POTENTIAL CORRECTIVE ACTIONS
63.) When terminating employment, do you require employees to turn in photo IDs, keys, access codes, and other security-related items?	O Yes O No O N/A	Former or disgruntled employees have knowledge about the operation of your wastewater system, and could have both the intent and physical capability to harm your system and its related assets.	a.
		Requiring employees who will no longer be working at your wastewater system to turn in their IDs, keys, and access codes helps limit these types of security breaches. Regularly update key distribution	b.
		log. Electronic "swipe" card systems can be an effective way to regulate access, even in small communities.	C.

QUESTION	ANSW	ER COMMENT	POTENTIAL CORRECTIVE ACTIONS
64.) Do you use ur and vehicles with y wastewater system prominently display	our O No name O N/A	water system name, helps inform the public when wastewater system staff are working on the system. Any observed activity by personnel without uniforms should be regard- ed as suspicious. The public should be encouraged to report suspicious activity to law enforcement authori-	a. b. c.
65.) Have wastewartem personnel been to report security/v bility concerns and suspicious activity?	advised O No ulnera- O N/A to report	Your personnel should be trained and knowledgeable about security issues at your facility, what to look for, and how to report any suspicious events or activity. Periodic meetings of authorized personnel should be held to discuss security issues.	a. b.



QUESTION	ANSWER	COMMENT	POTENTIAL CORRECTIVE ACTIONS
66.) Do your personnel have an incident report form available for use?	O Yes O No O N/A	An incident report form is a valuable tool to gather information about emergencies, and it may also provide guidance on appropriate responses. Everyone who answers the telephone, works at your wastewater facilities, or works at city hall needs to be trained in its use and have ready access to the form. Personnel should also know whom to contact in the event of an emergency. Incident reports are also used to document the response and record the number of events. This can be used as an important tool when planning maintenance and repairs. (A sample form is included as Attachment 2).	a. b.
		Also consider installing caller ID on your telephone system to keep a record of incoming calls.	

QUESTION	ANSWER	COMMENT	POTENTIAL CORRECTIVE ACTIONS
67.) Have employees been encouraged to develop a family emergency plan?	O Yes O No O N/A	A family emergency plan for each employee is appropriate to help employees relieve concerns about	a.
raining emergency plant:	OTWA	the well being of their family when they are called into service during an emergency. The Red Cross has	b.
		information for such planning.	c.
68.) Does your community have a human resource or personnel policy?	O Yes O No O N/A	Human resource or personnel policies need to cover a broad range of issues, including: drug and alcohol	a.
	01,,,1	abuse, sexual harassment, discrimination, firearms, disciplinary actions, evaluations and promo-	b.
		tions. These policies will serve to	c.

system.



protect the human assets of your

QUESTION	ANSWER	COMMENT	POTENTIAL CORRECTIVE ACTIONS	-
69.) Do your personnel receive regular training that relates directly to their job function?	O Yes O No O N/A	Training is essential for the development of a well prepared operations and support staff. Training needs to be meaningful and appropriate for each individual's responsibilities. Whenever possible, conduct emergency training exercises with other local emergency responders.	a.	
			b.	
			c.	
Are there additional vulneral	bilities?			
70.)	O Yes		a.	
	O No O N/A			
			b.	
			c.	
71.)	O Yes		a.	
71.)	O No		u.	
	O N/A		b.	
			c.	

Customer Assets

You should educate your customers about your system. Encourage them to be alert and to report any suspicious activity to law enforcement authorities.

QUESTION	ANSWER	COMMENT	POTENTIAL CORRECTIVE ACTIONS
72.) Is there a community outreach program to educate and inform your community about their wastewater system?	O Yes O No O N/A	Be proactive in educating your community about your wastewater system. Regularly send out information with bills to explain ways users can help protect the community's investment. One of your greatest assets is an informed community.	a. b. c.



QUESTION	ANSWER	COMMENT	POTENTIAL CORRECTIVE ACTIONS
73.) Does your wastewater system have a procedure to deal with public information requests, and to restrict distribution of sensitive information?	O Yes O No O N/A	Develop a procedure for personnel to follow when you receive an inquiry about the wastewater sys- tem or its operation from the press, customers, or the general public.	a.
		Your personnel should be advised not to speak to the media on behalf of the wastewater system. Only one person should be designated as the spokesperson for the wastewater system. Only that person should	b.
		respond to media inquiries. Establish a process for responding to inquiries from your customers and the general public.	c.

QUESTION	ANSWER	COMMENT	POTENTIAL CORRECTIVE ACTIONS
74.) Do you have a procedure in place to advise users of health risks caused by disruption of the wastewater system?	O Yes O No O N/A	It is critical to be able to get the word out as soon as possible after discovering a health hazard. Notifications may include contacting downstream drinking water systems and making announcements	a.
		via radio or television, door-to-door notification, a phone tree, or posting notices in public places. The announcement should include identification of the hazard and information on proper precautions.	b.
		Prioritize notification to customers who are at greatest risk. Enlist the support of local emergency response personnel to assist in the effort, as appropriate.	c.

QUESTION	ANSWER	COMMENT	POTENTIAL CORRECTIVE ACTIONS
75.) Do you have a procedure in place to respond immediately to customer complaints about sewage backups, odors, or other emergency situations?	O Yes O No O N/A	It is critical to be able to respond to and quickly identify potential problems reported by customers. Procedures should be developed in advance to investigate and identify the cause of the problem and take appropriate corrective action.	a. b.
			c.
76.) Are users, local first responders and the LEPC clear about the need to	O Yes O No O N/A	Communicate with emergency management personnel and industrial customers to ensure an imme-	a.
communicate with waste- water system personnel about the entry of haz- ardous materials into the collection system?	0.1	diate notification of hazardous materials entering the wastewater system.	b.
•			c.

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	QUESTION	ANSWER	COMMENT	POTENTIAL CORRECTIVE ACTIONS	
	77.) Are there set-aside funds available to replace critical equipment?	O Yes O No O N/A	There should be operational funds in reserve for emergency equipment replacement, or continuing opera- tions in the event of some disrup- tion, to keep the operation going.	a.	
	crucar equipment:			b.	
				c.	
	Are there additional vulnerab				
	78.)	O Yes O No O N/A		a.	2
				b.	
				c.	
	79.)	O Yes O No O N/A		a.	
				b.	
				c.	