

## MassDEP COVID-19 FAQs for Public Water Suppliers and Wastewater Service Providers

MassDEP has heard from operators of Drinking Water and Wastewater systems in Massachusetts asking for guidance or information relative to operational changes at these facilities due to Coronavirus concerns.

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**MassDEP is aware that COVID-19 is disrupting many normal activities and that water suppliers may face particular challenges in the days and weeks ahead. MassDEP commits to regular communication with suppliers to help address these challenges. Among other steps, MassDEP will be establishing a weekly teleconference with suppliers where issues can be raised, discussed and solutions can be developed.**

**Below are some of the questions we have already heard.**

### **Bacteria Sampling**

Q: Public water suppliers have asked about regulatory compliance related specifically to coliform sampling, expressing concerns about sites where access pose challenges as a result of measures taken to address COVID-19.

A: To protect public health, ongoing sampling is necessary to ensure that the water we provide meets health standards.

However, *if a public water supply operator is unable to access the approved sampling location* – for example, if the facility has closed or residents do not allow samplers into their homes for sample collection – alert MassDEP's regional office to let them know about the issue and to determine

whether alternative sampling locations or other measures can be utilized during this time to meet requirements.

### **Cross-Connection Control Inspections**

Q: Would MassDEP consider suspending required inspections of cross-control inspections for two to three weeks?

A: MassDEP is considering this request in consultation with the U.S. Environmental Protection Agency (EPA). An update will be posted in this space soon.

Q: Can systems avoid receiving notices of non-compliance for staffing shortages if the facilities have SCADA systems in place?

A: Staffing shortage is a potential emergency that is required to be covered in existing emergency response plans under 310 CMR 22.03(13), for drinking water treatment facilities. MassDEP will work with systems that are confronting absences to help determine whether some remote operations may be sufficient during this emergency time period to substitute for some on-site practices and the conditions needed.

Q: Small systems are concerned that their operator(s) may be unavailable due to illness. Can they direct a substitute operator on how to operate the treatment facility using a tool such as Facetime?

A: The use of substitute operators of the required grade or no less than one grade lower (e.g., as per the secondary operator requirements in 310 CMR 22.11B(2)(b) and (2)(d)) for the plant in question is already allowed as this would meet the direct responsible charge requirements while the primary operator is “temporarily absent.” For other situations, MassDEP will review requests received from systems expeditiously.

### **Staffing**

Q: What can a system do if it will not have enough operators?

A: All water and wastewater treatment facilities should have approved staffing plans. ***If a facility anticipates not being able to meet required staffing requirements, the permittee should notify the MassDEP regional office*** of this event and its expected duration. Regional staff can review and determine if staffing is sufficient and assist in developing contingencies, if possible.

Q: How can a system increase its number of operators?

Water and wastewater treatment facilities are encouraged to ***join the Massachusetts Water/Wastewater Agency Response Network (MAWARN.org)*** to find licensed operators who may be able to help a system meet temporary staffing needs. Also, if where staffing permits, systems should consider ***cross-training other staff***. The Massachusetts Water Resources Authority has offered assistance in conducting one-on-one sampler training.

Q: How can we get more licensed operators? For example, the Division of Professional Licensure's (DPL) regulations state that an operator may renew a license within two years after the license has lapsed. However, if two or more years have passed since the license lapsed the operator must pass the certification exam again. Does DPL have flexibility to waive this requirement or can it amend its regulations? This would help to abate a potential shortage of operators.

A: MassDEP will consult with DPL on seeking temporary emergency certificates or provisional certificates from DPL in order to serve this need while these operators are working through DPL's recertification requirements. The Board of Certification of Operators of Drinking Water Supply Facilities and the Board of Registration of Operators of Wastewater Treatment Facilities are authorized by regulation to issue emergency certifications and registrations for up to six months.

Q: A lot of trainings have been cancelled or interrupted which could mean operators are not able to get the necessary contact hours to maintain their licenses. Can MassDEP and the Department of Public Licensure extend deadlines for getting contact hours? Can MassDEP provide opportunities for online training?

A: MassDEP is currently considering options to host training classes online to make up for recent course cancellations. In addition, it will be consulting with the Department of Public Licensure on authority for extending license terms.

Q: If an operator's family member is quarantined, should the public water system ask the operator to stay home too? What if an operator is required to sample at a facility where a case of coronavirus has been confirmed? Do we have any guidance on how to advise the public water system?

A: These situations will likely have to be addressed on a case-by-case basis by the facility based on available information and working with public health authorities.

## **Chemicals and Other Supplies**

Q: What if there is a shortage of necessary chemicals? For example, sodium fluoride is only available from China. Can MassDEP issue waivers to public water systems that cannot obtain sodium fluoride? Can MassDEP issue a temporary inactivation of certain treatment for water or wastewater systems if chemicals are not available?

A: The drinking water regulations at 310 CMR 22.03(13) includes "depletion of treatment chemical inventory" as a potential emergency for which existing emergency response plans shall include "detailed steps that the water supplier shall implement to ensure the continuation of service." MassDEP acknowledges that in some cases selected treatment could be suspended due to shortages that are outside the control of the public water system and for which no other source of supply can be identified. Fluoridation would be an example as this practice is used to promote dental health but is not essential to clean, safe drinking water. However, in cases where treatment chemicals are necessary for the

production of clean drinking water suspension of that treatment would require a declaration of a state of water emergency under MGL c. 21G, § 15, and 310 CMR 36.00 and result in MassDEP issuing public health orders based on the unique facts of the situation .

### **Additional Information**

Q: What actions should water and wastewater system operators take to address the Coronavirus?

A: There are several best practices that operators can adopt to minimize interruption of services as well as illness of employees. These include:

- **Review your Emergency Response Plan (ERP) with staff**, with a focus on the pandemic/communicable disease section. Update as necessary to ensure continuity of operations in the event a staff member or members become affected and must quarantine. Remember, a shortage or lack of resources that could affect operations of your system is considered an emergency under 310 CMR 22.04(13).
- **Participate in mutual aid programs!** Being a member of MAWARN and/or the statewide mutual aid programs will be of value if you need to call upon other communities' resources for assistance. **If you are not part of any mutual aid program, you can access the forms at these links:**
  - **MAWARN** – download the application here, [www.mawarn.org](http://www.mawarn.org), and submit to Kirsten King at NEWWA.
  - **Statewide Mutual Aid** - <https://www.mass.gov/service-details/intrastate-mutual-aid>
- **Reach out to your neighboring utilities** to see what they may be doing to plan. Good communication before an event is key to response and recovery. If neighboring utilities are not members of MAWARN or other mutual aid, encourage them to join.
- **Check in with your chemical suppliers** to see if any deliveries may be impacted, and what you can do to ensure you have enough supply through advance purchases. Check in with other key suppliers for status on materials.
- **Fuel your service vehicles and generators. Equip your vehicles with cleaning supplies and personal protective equipment.**
- **Encourage all employees to get the flu shot** if they have not done so already as this helps to boost your immune system. It's not too late!
- As Curtail interactions; practice "social distancing"

Q: Where can I find information for the **water and wastewater industries**?

A: Below are links to helpful resources for the **water and wastewater industries**:

Centers for Disease Control and Prevention (CDC)

- <https://www.cdc.gov/coronavirus/2019-ncov/php/water.html>

U.S. Environmental Protection Agency Guidance on Coronavirus and Drinking Water and Wastewater

- <https://www.epa.gov/coronavirus/coronavirus-and-drinking-water-and-wastewater>

American Water Works Association

- <https://www.awwa.org/AWWA-Articles/coronavirus-and-water>

Water Environmental Federation

- <https://www.wef.org/news-hub/wef-news/the-water-professionals-guide-to-the-2019-novel-coronavirus/>

WaterISAC, a membership organization and international security network created by and for the water & wastewater sector:

- <https://www.waterisac.org/>
- <https://www.waterisac.org/portal/business-continuity-planning-event-influenza-pandemic-reference-guide>

WaterOnline-Coronavirus-What Treatment Professionals Need To Know

- <https://www.wateronline.com/doc/coronavirus-and-the-water-cycle-here-is-what-treatment-professionals-need-to-know-0001>

Stantec article

- <https://ideas.stantec.com/water/coronavirus-and-the-water-cycle-here-is-what-treatment-professionals-need-to-know>

Q: Where can I find more general information?

A: Below are additional links to helpful resources:

U.S. Environmental Protection Agency

- <https://www.epa.gov/coronavirus>
- “Top 10 List Pandemic and Natural Disasters Notebook” (being updated now; tips are still relevant, but some links are outdated):  
<https://www3.epa.gov/region1/eco/drinkwater/pdfs/TopTenFlu.pdf>

Centers for Disease Control and Prevention (CDC)

- <https://www.cdc.gov/coronavirus/2019-ncov/index.html>

MA Department of Public Health (MDPH)

- <https://www.mass.gov/resource/information-on-the-outbreak-of-coronavirus-disease-2019-covid-19>