



Commonwealth of Massachusetts  
Executive Office of Energy & Environmental Affairs

# Department of Environmental Protection

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## MassDEP COVID-19 FAQs for Public Water Suppliers

**This document's latest questions and answers are highlighted in yellow.**

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This information is available in alternate format. Contact Michelle Waters-Ekanem, Director of Diversity/Civil Rights at 617-292-5751.

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MassDEP Website: [www.mass.gov/dep](http://www.mass.gov/dep)

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**Public Water Suppliers: you are advised to contact your MassDEP regional office for assistance on response to coronavirus (COVID-19)**

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

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 has established a weekly teleconference with public water suppliers where issues can be raised, discussed and solutions can be developed.

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**MassDEP is providing these responses to questions from stakeholders in the water supply industry. This Frequently Asked Questions (FAQ) document will be updated periodically.**

## **Permit**

**Question (Permit1): On March 26, 2020, Governor Baker issued an Order Suspending State Permitting Deadlines and Extending the Validity of State Permits. How does this affect my permit?**

Answer: The Order states, among other provisions, that a permit or approval by a state permitting valid as of March 10, 2020, shall not lapse or otherwise expire during the state of emergency and the expiration date of approval shall toll during the state of emergency. For specific permit related issues, contact your regional MassDEP office.

**Question (Permit2): Is there guidance from the U.S. Environmental Protection Agency on compliance and enforcement?**

Answer: In a memorandum from Susan Parker Bodine, dated March 26, 2020

(<https://www.epa.gov/sites/production/files/2020-03/documents/oecamemooncovid19implications.pdf>), the EPA describes its enforcement discretion policy for many of its programs, including the Safe Drinking Water Act. The memo states,

*“Public water systems have a heightened responsibility to protect public health because unsafe drinking water can lead to serious illnesses and access to clean water for drinking and handwashing is critical during the COVID-19 pandemic. Accordingly, the EPA has heightened expectations for public water systems. The EPA expects operators of such systems to continue normal operations and maintenance as well as required sampling to ensure the safety of our drinking water supplies. The EPA expects laboratories performing analysis for water systems to continue to provide timely analysis of samples and results. States play the lead role on drinking water issues, but the EPA also has important drinking water enforcement and oversight responsibilities, including direct implementation responsibilities in some locations.*

*In the event of worker shortages in the water sector, the EPA will consider continued operation of drinking water systems to be the highest priority. In anticipation of worker shortage and laboratory capacity problems, the EPA considers the following tiers of compliance monitoring to assure the safety of our drinking water supplies and prioritize prevention of acute risks. Of highest priority is monitoring required under National Primary Drinking Water Regulations to protect against microbial pathogens. Additional priorities include nitrate/nitrite and Lead and*

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*Copper Rule monitoring followed by contaminants for which the system has been non-compliant.”*

**Question (Permit3): The Water Management Act Program’s drought guidance was sent to PWS last week. It calls for nonessential outdoor watering restrictions that differ from our water system’s Water Management Act permit. What are we bound to follow?**

Answer: As the letter notes, you are bound to follow nonessential outdoor watering restrictions that are in your permit. However, we are encouraging everyone to conserve water and let us know if you have implemented water conservation practices.

**Question (Permit4): Given that many people are at home, and there is more frequent water use to maintain proper sanitation practices, will DEP be holding water systems to maximum daily pumping rates on wells?**

Answer: MassDEP acknowledges that the pandemic is resulting in significant changes to the water demands faced by PWS. Some systems are experiencing significant increases, while others have seen demand and revenues drop just as severely. While still learning about the impacts of those changes caused by social distancing requirements, MassDEP feels strongly that PWS should maintain compliance with their maximum daily pumping limits during the pandemic. Exceeding those maximum daily volumes may impact water quality and public safety. While we recognize that average daily water use patterns are changing, we are not expecting peak daily usage to significantly exceed the prior year's peak daily flows. MassDEP will note all violations but will consider enforcement discretion on violations of annual average daily volumes provided that the system is implementing required nonessential use reductions. MassDEP advises any system potentially exceeding their maximum daily volumes to consult with their Regional DWP staff.

**Question (Permit5): With this increase in COVID-19 cases this fall, water suppliers and wastewater operators may need to go back to the split shifts for staffing (as were used in the spring and summer) and run below typical staffing levels to ensure PWS/WWTP have the minimum staff available to run a plant.**

Answer: Systems needing to make staffing changes are urged to speak with their regional MassDEP contacts (see list on pages 2-3), as they did in the spring and summer.

**Question (Permit5): At the beginning of the COVID crisis in the spring, the EPA had a waiver/extension program for utilities with a legitimate compliance issue. That waiver/extension program has ended. As the number of infections increases, is there any plans to reinstate that program?**

Answer: The waiver/extension program was particularly intended for wastewater utilities. EPA Region 1 has not heard any indication from EPA’s Office of Enforcement and Compliance Assurance that they

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plan on issuing another policy related to the exercise of enforcement discretion due to COVID-19. However, if any operators of wastewater treatment plants have issues related to their compliance with monitoring or reporting obligations due to COVID-19 they should contact Doug Koopman at EPA Region 1. His contact information is: Koopman.Douglas@epa.gov, (617) 918-1747.

**Question (Permit6): In reviewing water consumption information for 2020, residential use noticeably increased, while commercial use decreased. Given many people were working and learning from home, reducing travel, etc. amidst the pandemic, this doesn't come as a total surprise. Has MassDEP given any consideration to acknowledging or addressing that some portion of impacts to RGPCD for 2020 are really attributed to these large numbers of people being tied to their homes that used to go to school/the office/travel/etc.?**

Answer: MassDEP recognizes that it is possible that an increase in the number of residents who are at home during the State of Emergency may increase a public water system's daily residential water use. MassDEP will need to evaluate each situation further but will definitely consider exercising its discretion for systems exceeding the standard of 65 residential gallons per capita per day (RGPCD) or their annual daily volumes.

## Sampling

**Question (Sampling1): How do public water suppliers protect themselves or the people present at sampling sites?**

Answer: Maintaining safe drinking water is an essential public health requirement. The following links from OSHA and information from Governor Baker's COVID-19 webpage provide the most up-to-date guidance: <https://www.osha.gov/Publications/OSHA3990.pdf> and <https://www.mass.gov/info-details/covid-19-guidance-and-directives>

**Question (Sampling2): What sampling is required if a PWS is completely closed?**

Answer: No sampling is required of a closed public water system. When a PWS is closing, let MassDEP regional staff know. Follow RTCR (Revised Total Coliform Rule) seasonal start-up procedures when the public water supply comes back on-line. For more information see:

<https://www.mass.gov/service-details/seasonal-start-up-information-certification-and-checklist-for-non-community-systems>.

**Question (Sampling3): What should we do if the PWS is not closed, but the operator cannot take the sample at a location (maybe he is not allowed to enter)?**

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Answer: Collect a sample from an alternate location, preferably the upstream or downstream repeat site for the original sampling location, or a nearby site where you have access. When choosing alternate locations, it is important to achieve geographical coverage. For new locations that are not currently part of your coliform sampling plan, assign the next highest number from your existing locations and indicate that this is an emergency location by adding an "E" to the end of the new number (e.g. 12E). Include the full address of any new location on the chain of custody. Have your lab add to the comments/notes on eDEP/Bacteriological Report "Alternate RS per COVID-19." Prior approval to use these sites is not required by MassDEP during this emergency. Notify MassDEP's regional office via email or at [program.director-dwp@mass.gov](mailto:program.director-dwp@mass.gov) to let us know about the access issue and to identify the alternate location(s) that was sampled. The goal is to collect the proper number of samples using alternate or other locations acceptable to the system's certified operator or designee.

**Question (Sampling4): What if we have tried everything but still cannot collect a sample?**

Answer: Contact MassDEP immediately to review alternatives. Based on system configuration, additional sampling may be allowed at some available locations.

**Question (Sampling5): Can a public water system change the timing of required samples? For example, can a public water system shift samples that were to be collected during week 1 into week 2 and shift the samples to be collected during week 3 into week 4 so that sampling is only conducted in two of the four weeks?**

Answer: The requirement in the Revised Total Coliform Rule (RTCR) is to collect samples "at regular time intervals throughout the month," as laid out in a public water system's MassDEP-approved coliform sampling plan. Public water systems that need to replace weekly sampling with samples taken every other week should contact their regional MassDEP office.

**Question (Sampling6): We sample every other week. If we are required to do 25 samples per month, can cut out a few sites and double up other sites and still meet the 25 are we required to covered?**

Answer: Public water systems should follow sampling as close to normal procedures as possible, given the systems' concern about access. Try to sample at up and downstream sites if the routine site is unavailable. If the supplier must return to an accessible location, samples should be collected in different weeks to least provide some temporal confirmation about the system. The minimum number of samples for the month must be collected and be representative of the distribution system. Contact MassDEP regional staff for assistance.

**Question (Sampling7): What if I can't collect all my required bacteria samples or do so after the end of the month/quarter?**

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Answer: According to EPA, this will be considered a monitoring violation and public notice will be required but it is expected that both the state and EPA will exercise enforcement discretion in responding to these situations.

**Question (Sampling8): Is there more guidance on bacteria monitoring?**

Answer:

- **Confirm your sampling pool now!** PWS should contact their regular locations including upstream and downstream sites **now** to determine if access is still available or if special precautions can be used (e.g. Personal Protective Equipment) that would allow for continued monitoring.
- **Expand your sampling pool now!** Identify additional locations for monitoring and contact your MassDEP regional office. Use the same format as your current coliform sampling plan.

**Question (Sampling9): We need to discuss non-RTCR distribution system sampling events like Disinfection By-Products or UCMR4, which will require the collection of numerous cyanobacteria samples that will not provide additional information and could divert manpower when operators are out sick.**

Answer: PWS should immediately evaluate their sampling plans to identify acceptable alternate locations for any sampling sites that are not available. Disinfection By-Product Rule samples can be collected at locations near your existing sites. Notify MassDEP if you need to move any DBPR locations during this emergency. However, LCR samples should not be moved to new locations without MassDEP approval as these sites need to be confirmed as the same or higher tier under the rule.

MassDEP will discuss UCMR4 sampling with EPA as this program is under federal oversight.

**Question (Sampling10): Can we get relief from EPA on the RTCR rules/requirements (i.e. a single confirmatory sample from that site or nearby) before we trigger the usual requirements?**

Answer: At this time, EPA is urging that all regulatory requirements be met. Failure to collect required samples will result in a violation that triggers public notice. Contact your MassDEP regional Office about the specifics your situation. MassDEP will consult with USEPA on the implementation of the newly issued federal enforcement policy.

**Question (Sampling11): We are scheduled for Lead and Copper sampling in the 2nd quarter 2020. There is a lot of interaction with the public during this process and I am concerned about not being welcome to sample. Does MassDEP still expect us to meet this requirement?**

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Answer: As Lead and Copper Rule sampling is a homeowner-based sampling program you should be reaching out to your volunteer homeowners now to confirm whether they plan to continue their participation or not. There does not need to be in-person contact between residents collecting samples and those dropping off sample bottles/picking up samples. Explaining to them that bottles can be left outside their residences on a specific day so that they can collect samples the next morning may reassure them that contact with your staff may be minimal. Providing them with a phone number where they can reach staff should they have questions and asking if they would be willing to provide the same to you could also reduce the need for any face-to-face contact.

**Question (Sampling12): Can DEP provide any guidance on Lead and Copper sampling? We are required to collect 60 samples twice a year. It might be difficult to get residents to collect samples.**

Answer: Systems that sample for Lead and Copper twice a year collect samples between January and June and again between July and December. So, you have some flexibility as to when during those time periods sampling will get done. Now is a good time to contact the residences on your primary and alternate sampling location lists to determine whether they are willing to continue participation in the Lead and Copper sampling program in 2020. If you need to change sampling locations based on refusals to participate, contact MassDEP regional staff for assistance with completing revised Lead and Copper Sampling Plans and Highest-Tier-Site forms. New Lead and Copper sampling locations must be approved prior to sample collection, to assure samples are collected at the highest-risk locations.

**Question (Sampling13): What seasonal start-up procedures steps should a closed public water system take prior to opening?**

Answer: Unless directed otherwise, any public water system which has closed or will close due to COVID-19 will be required to collect and report Special Sample/s (SS sample type code) and to complete and submit a Seasonal Start-Up Certification form to ensure proper re-activation of the system, including but not limited to flushing, disinfection if needed, and procurement of absent SS samples prior to opening.

To certify to MassDEP, the public water system should **modify the Seasonal Start-Up form by adding at the top of the form "EMERGENCY CLOSURE ON (insert date) due to COVID-19"**.

For more information see: <https://www.mass.gov/service-details/seasonal-start-up-information-certification-and-checklist-for-non-community-systems>.

**Question (Sampling14): Can I sample an exterior spigot or hydrant to evaluate its use as an alternate routine sampling site under the RTCR before it is considered a compliance location?**

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Answer: This is a last resort; the risk for contamination is higher at an outside spigot or hydrant and the chance that inadequate cleaning and flushing may cause bacterial results to be positive. Bacterial contamination of your water supplies could alarm your customers. Work with MassDEP to see if there is a better alternative. However, MassDEP will allow a PWS to inspect, clean, flush and sample an exterior spigot to evaluate its potential use as an alternate RTCR sampling site without that result being considered for compliance.

The spigot or hydrant must be assigned a new sample location number that ends in E (e.g. 015E) and the initial sample labeled a Special Sample on the chain of custody submitted to the laboratory. All Special Samples must be reported to MassDEP and will not be considered for compliance - even if they are clean. Once a PWS considers a spigot acceptable then compliance samples, using the same new location number but labeled Routine Samples, can be collected. The first Routine Sample must be collected no earlier than 24 hours after the Special Sample used to evaluate the spigot.

Once an exterior spigot or hydrant has been accepted for compliance sampling all bacterial-positive samples that are not invalidated under 310 CMR 22.05(3) will require repeat monitoring (UR/DR/OR) and will be used in evaluating if an RTCR Treatment Technique Trigger has been met and if an E. coli MCL violation has occurred. For more information see (<https://www.mass.gov/doc/bacteria-sampling-at-outside-tapsspigotshose-bibs/download>, <https://www.mass.gov/doc/bacteria-sampling-at-hydrants-using-hydrant-sampler/download>).

**Question (Sampling15): Our current Lead and Copper sampling plan states that we are to collect 40 samples in the 2nd quarter and 40 samples in the 4th quarter of this year. These samples are difficult to obtain under normal circumstances. Would we be eligible for some sort of relief or restructuring regarding lead and copper sampling?**

Answer: EPA's enforcement discretion policy, dated March 26, 2020

(<https://www.epa.gov/sites/production/files/2020-03/documents/oecamemooncovid19implications.pdf>),

emphasizes the importance of protecting public health but also prioritizes monitoring in the case of a worker shortage. For specific permit related issues, contact your regional MassDEP office.

**Question (Sampling16): Can trihalomethane (THM) testing be on a different schedule?**

Answer: THM and haloacetic acids five (HAA5) testing is still required but alternate sites can be used if access to approved sites is limited.

**Question (Sampling17): Could MassDEP provide some further clarification on the bacteria sampling guidance they provided with the use of alternative sample sites? In**

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**the FAQs, there is guidance on properly identifying the sample and notifying MassDEP’s regional offices.**

Answer: Outside taps, spigots, hose bibs, and hydrants are open to the atmosphere, dust, and animals, and may be subject to higher levels of contamination than inside sampling taps. As such, outside bacteria sampling sites are not generally recommended. MassDEP has provided guidance on sample collection at spigots and hydrants if, during the COVID-19 emergency, a public water has no other choice for a bacteria sampling location (<https://www.mass.gov/doc/bacteria-sampling-at-outside-tapsspigotshose-bibs/download> and <https://www.mass.gov/doc/bacteria-sampling-at-hydrants-using-hydrant-sampler/download>.)

**Question (Sampling18): When it comes to the use of spigots / hydrants, there is mention of those locations being considered “special samples” first and that a “routine sample” is to be collected no earlier than 24 hours after the special sample. Is there an expected timeframe of when the follow-up sample should be taken?**

Answer: If a PWS chooses to use a spigot/hydrant sample site as a last resort or to evaluate the spigot/hydrant, the PWS is encouraged to collect a special sample prior to collecting a routine sample. A routine sample at the evaluated spigot/hydrant must be conducted 24 or more hours after collecting the special evaluation sample.

**Question (Sampling19): For the follow-up sample, is it just the one sample site being taken or does the entire round need to be taken at the same time? For example, say we sampled 001E, 002, and 01G-RW with 001E being a special sample at a spigot. Would we need to do follow up sampling at just the 001E spigot location or all three locations?**

Answer: In the provided example above, if the first sample from the outdoor spigot (location 001E) was coded as a Special Sample (type code 'SS') for evaluation purposes, then the PWS would need to re-sample that site after at least 24 hours to obtain their routine sample (type code 'RS'). However, if the PWS did not collect their raw water (01G-RW) the same day this routine sample (001E RS) is collected, and there is a coliform detect, then, in addition to the repeat samples required by the Revised Total Coliform Rule, the Ground Water Rule would require an additional triggered source water sample at 01G-RW. So it would make more sense to collect the evaluation sample before the routine set so that all distribution samples that are being counted for compliance and the raw water source sample were taken on the same day. For this type of case specific question and assistance please contact your regional Drinking Water Program contact.

**Question (Sampling20): It sounds like we need approval of this outside sample location before we resample, what will this approval look like? What is the expected**

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**timeframe of approval so that the initial sampling, approval from DEP, and subsequent sampling can be conducted within the compliance period. We are concerned with timelines for small systems that may require alternative sample sites or need subsequent resampling per the guidance.**

Answer: If you need to return to the spigot/hydrant for future sampling during this COVID-19 emergency you may do so. Please contact your regional office for specific instructions for your system.

**Question (Sampling21): Along the same topic, can DEP clarify that if an alternative location is used but it is not an outside spigot / hydrant, that additional sampling is not required? Only additional sampling is required in the case of using a spigot / hydrant as an alternative location.**

Answer: If a PWS spigot/hydrant sample is positive for bacteria the PWS must follow all requirements for bacteria positive samples including sample collection at upstream and downstream location for that spigot/hydrant. Please contact your regional office for specific instructions for your system.

**Question (Sampling22): With the recommendation / guidance to flush schools to mitigate lead and copper levels prior to their reopening, how soon after reopening and flushing can the samples be conducted? Depending on when facilities are able to reopen there may be a short time-frame in Q2 to conduct their required sampling on top of flushing for schools that are PWS. Additionally, if many of these locations that require Q2 lead and copper sampling re-open right before the end of Q2, will there be flexibility on the reporting timeline for these samples if the labs are inundated with samples and cannot get the reports or e-filing done by the 10th of the month?**

Answer: Flushing should be completed prior to the schools' opening and samples should be collected under normal operations after 8-18 hours of stagnation. Please contact your MassDEP regional contact for more information. LCR reporting deadlines are federal and state requirements and a violation will be assessed for all violations. However, EPA and the state will consider enforcement discretion when considering required actions following violations specifically related to COVID-19. Please contact your MassDEP regional contact for more information.

**Question (Sampling23): Can a system use an outside spigot for disinfection by-product sampling?**

Answer: Yes. You may use an outside tap/spigot as long as you can get a controlled laminar flow, the sample is not turbid and all sample collection procedures are followed. See EPA's Quick Guide to sample collection at [https://www.epa.gov/sites/production/files/2015-11/documents/drinking\\_water\\_sample\\_collection.pdf](https://www.epa.gov/sites/production/files/2015-11/documents/drinking_water_sample_collection.pdf).

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**Question (Sampling24): Are there any sample taps that water departments could integrate into the distribution system that could be used as routine sample sites? This would eliminate the access problems we are having now, should something like this happen in the future.**

Answer: MassDEP will consider Sampling Stations based on a case-by-case review of a public water systems' sampling plan. Sampling Stations are outside devices used for collecting water samples for water quality monitoring purposes. These sampling stations are typically positioned at street level, where they connect to a local water main, and are designed as enclosed, secured boxes containing a small sink and spigot to aid in sample collection. These devices may be prevalent in other states and have been known to facilitate sample collection when otherwise impossible or challenging. Please note these devices are more representative of water in the main rather than at the customer's tap and as such are not typically approved by MassDEP's Drinking Water Program for bacteria sampling locations. However, MassDEP's Drinking Water Program may on a case-by-case basis approve sampling stations as part of a public water system's bacteria or other water quality evaluation sampling plan if local conditions make their use necessary. Sampling Stations must be certified to NSF/ANSI Standard 61 and will require New Technology Approval by the department per 310 CMR 22.04(8).

**Question (Sampling25): What should we do about LCR samples for schools as they are not open and may not be open before the sampling period (June 30) ends?**

Answer: The public water system (PWS) must ensure that the Lead Contamination Control Act (LCCA) schools and early education and care facilities (EECF) are sampled while school is in session (two samples in two schools). Therefore, sampling of schools/EECFs may be delayed until after May 4, 2020, or later if the opening of schools/EECFs are further delayed. PWSs can fulfill the schools/EECFs sampling requirement by adding the schools in the following monitoring period when the schools/EECFs are back to routine operations.

If the PWS is a Non-transient Non-community (NTNC) school and is currently closed, sampling is still required if the facility reopens prior to June 30, 2020. If the facility does not reopen prior to June 30, 2020, a sampling violation will be assessed if the facility was open for any period between January 1, 2020, and June 30, 2020.

**Question (Sampling26): Are PWS allowed to collect a Special Sample ("SS" sample type code) for evaluation purposes for an INTERIOR location (inside a home or business) prior to selecting the site as an alternate routine sample location for bacteriological analysis (total coliform) during the COVID-19 emergency?**

Answer: No. PWS may NOT collect a Special Sample for evaluation purposes for an INTERIOR alternate routine location. The opportunity to conduct Special Sampling ("SS" sample type code) for

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evaluation purposes prior to selecting an alternate routine bacteriological analysis (total coliform) site during the COVID-19 emergency is limited to outdoor spigots and hydrants. A PWS should use its best professional judgement when deciding whether an interior tap would be appropriate for sampling. This decision, for example, should rule out locations with whole house (Point of Entry (POE)) or fixture (Point of Use (POU)) treatment as well as locations that are not sanitary such as a janitorial slop sink.

**Question (Sampling27): We are scheduled for Lead & Copper sampling in Quarter 3. In the past, MassDEP has provided an approved list of primary and alternative sampling locations. Will MassDEP be providing a similar list this year, or should we use the list of locations from our last round of Lead & Copper sampling?**

Answer: It is the responsibility of each public water system to provide MassDEP with a list of primary and alternative sites for MassDEP approval. If your regional office normally provides you with a reminder of your approved sampling sites list each year, or at least reviews your list, we encourage you to discuss your lead and copper sampling plan with your regional office.

**Question (Sampling28): With school closed for the rest of the year, what about LCR sampling?**

Answer: This question was answered previously. See Question (Sampling 25).

**Question (Sampling29): In trying to locate sampling sites at a facility, the Operator found that some of the fixtures within the facility are electronic eye activated with tempered water. What is EPA's or DEP's position on testing tempered water for lead and copper?**

Answer: Tempered water fixtures provide a mix of hot and cold water. Hot water is known to leach more lead. Therefore, this type of fixture should only be used as an LCR sampling site if there are no other alternatives. If selected, the results from the fixture will not be invalidated based on tempered water fixture selection. If used as LCR sampling site, it should be identified as tempered water fixture on the report.

**Question (Sampling30): "NHDES has a letter on their website and it appears as though they put out this letter to non-community systems and seasonal systems impacted by COVID. It strongly urges them to continue routine monitoring or give them steps they need to take if they do not, <https://www.des.nh.gov/covid19/documents/pws-bacteria-sampling.pdf>. Is there a similar communication DEP could send out to small systems and seasonal systems with a similar message especially in light of potential openings looming for many in the state?"**

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Answer: Mass DEP has been working directly with seasonal and closed or low flow system that have notified MassDEP of their operational status. MassDEP has provided the known systems with one-on-one technical assistance. In addition, MassDEP Drinking Water Program has provided the following technical assistance information for seasonal, closed or operating under low flow non-community or small PWS. This information was published in Drinking Water Update Email 5-15-2020 located at <https://www.mass.gov/lists/communication-to-public-water-suppliers#newsletters-> and provides guidance for the following types of non-community or small PWS operation status:

1. Seasonal Systems
2. Public Water Systems that continued operations including operator oversight inspections and routine water quality monitoring
3. Public Water Systems that DID NOT continue operations (including operator oversight inspections and routine water quality monitoring), BUT DID PROVIDE DOCUMENTATION to MassDEP of the temporary closure
4. Public Water Systems that DID NOT continue operations (including operator oversight inspections and routine water quality monitoring), AND DID NOT PROVIDE DOCUMENTATION to MassDEP of the temporary closure.

In addition, MassDEP regional offices continue to work known seasonal or closed PWS to ensure that they are aware of our Start-up requirements and guidance. Please contact your regional office contact for more system specific information.

**Question (Sampling31): For an Non-transient Non-Community (NTNC) public water system that exceeded the copper action level only, not lead, would a documented comprehensive building flushing program be an acceptable alternative instead of installing corrosion control treatment (CCT) or physically replacing all lead-containing or copper plumbing materials?**

Answer: According to EPA, flushing or use of bottled water is not a long-term alternative option in lieu of CCT. For more information regarding CCT options see:

[https://www.epa.gov/dwreginfo/optimal-corrosion-control-treatment-evaluation-technical-recommendations.](https://www.epa.gov/dwreginfo/optimal-corrosion-control-treatment-evaluation-technical-recommendations)

**Question (Sampling32): I took start-up samples (SS) on March 23, 2020. All samples came back negative, total coliform absent. The system was due to open April 1 but has not opened to the public yet. Are my start-up samples still good or do I have to take additional (SS) samples before the system is open to the public? There is no firm date when systems will open to the public yet. During the delayed opening, I have been running water in fixtures, flushing system and doing residuals routinely.**

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Answer: Start-up samples are intended to identify contamination that may have been introduced during system depressurization and subsequent repressurization.

If the PWS has maintained pressurization since collecting the initial special samples round, operated the water system as described and collected routine bacteria during its closure, initial vulnerability has been determined and the water system continued in operation. Unless otherwise specified by your MassDEP Regional Office, MassDEP will allow the PWS to remain open with a routine round of samples and not place any additional financial burden on the PWS by requiring another round of special samples.

If the PWS maintained pressurization since collecting the initial start-up special samples but did not collect routine monthly bacteria in the weeks since start-up, The PWS effectively 'closed' and should complete the modified start-up form and procedures prior to opening.

If the PWS has depressurized since the initial start-up special samples were collected MassDEP will require the PWS to repeat the start-up special samples and procedures prior to reopening.

MassDEP encourages each system to contact their regional MassDEP Revised Total Coliform Rule (RTCR) contact if there are any questions on re-opening.

**Question (Sampling33): Facilities want to be ready to open when they get the allowance from the state to open up, especially the seasonal systems that rely on coordinating with contract operators. If seasonal startups are done in preparation for their opening like normal and they are routinely sampling water quality like normal, can they open whenever the time comes without additional processes and paperwork? Some of these places are preparing for opening like normal and do have limited activity on site by staff who do use the water, they just aren't open to the greater public and seeing usage rates as high as normal. We understand flushing is recommended practice for these situations as previously provided by MassDEP.**

Answer: If a PWS has completed the special start-up monitoring, reporting and certification, and has continued operating and routinely sampling water quality the PWS may continue operations.

PWSs are encouraged to notify their MassDEP regional Revised Total Coliform Rule (RTCR) contact of their actions and to have any questions answered.

**Question (Sampling34): Other small systems may have had to temporarily shut down and haven't been able to routinely monitor water quality. They also face uncertainty when they can open again but do want to prepare by doing start up procedures and sampling. Can they do start up procedures and then routinely monitor for TC and routinely flush so that they are ready to open up when the time comes even if it is a few months down the line? For some systems, they aren't going to see normal water**

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**usage or normal numbers of people using the water for some time due to a variety of factors, mandated office staffing levels, for example.**

Answer: Yes. PWSs that complete the special start-up monitoring, reporting and certification and then continue to operate and routinely sample water quality may open to the public when the sector is allowed to open under the Governor's Directive.

MassDEP encourages all closed PWS to operate in this manner, if possible, to be ready for their sector reopening date.

PWSs are further encouraged to notify their MassDEP regional Revised Total Coliform Rule (RTCR) contact of their actions and to have any questions answered.

**Question (Sampling35): Question: How should we report and document RTCR monitoring violations caused by COVID-19?**

Answer: If during the Massachusetts Governor Declared COVID-19 emergency, starting March 13, 2020, a Public Water System (PWS) was unable to collect and analyze the total number of required RTCR samples from a sufficient number of sampling locations, because of a documented COVID-19 related reason, **MassDEP/DWP will notify the PWS of the violation, document and report the violation to USEPA and provide the PWS with appropriate flexibility in the required follow-up actions and notification language if the PWS performed the following action(s):**

**1. The PWS planned ahead** by reviewing their sampling sites and identifying other sites. Due to the PWS emergency response planning requirement per 310 CMR 22.04 (13) MassDEP expected PWSs to adjust their sampling sites to remain representative of the distribution system.

**2. The PWS revised their sampling plans** (no MassDEP approval was necessary or required) to locate other sites, e.g. for RTCR upstream (UR) and downstream (DR) locations, and other alternate sites while representing the distribution system (i.e. high- and low-pressure areas and system-wide sampling during the month). The PWS used all of the flexibility, including using outside spigots as a last resort, as provided by MassDEP in the Q&A available on <https://www.mass.gov/doc/massdep-covid-19-faqs-for-public-water-suppliers-0/download>. MassDEP expected PWS to consult with DWP staff on sample locations if sample locations that were UR, DR or geographically representative were not available.

**If after planning and considering and/or trying alternative options, the PWS was still unable to get the total number of sampling sites, the PWS should perform all the following action(s) below:**

**3. Provide MassDEP with written documentation** indicating that the cause of the violation was not an intentional lapse in compliance; but that noncompliance was a result of issues related to the COVID-19 emergency that were outside of the PWS's control. To document the COVID-19 related reason for the violation, the PWS should use MassDEP's Form for documenting COVID-19 related non-compliance located at <https://www.mass.gov/doc/documentation-for-failure-to-comply->

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[with-a-requirement-as-a-result-of-the-covid-19-emergency/download](#) .

**4. Provide the following MassDEP discretionary language via Public Notification or Consumer Confidence Report** to notify the public of the violation after receipt of MassDEP's emailed confirmation of receipt and acceptance of the PWS documentation:

- **If the PWS is a Community public water system (COM):** within one year after learning of the violation in accordance with 310 CMR 22.16(4)(b) the system must issue public notice (PN) or insert the attached consumer confidence report (CCR) statement in the next CCR if the CCR will meet public notification timing and delivery requirements as required by (310 CMR 22.16(4)(d)) (i.e. if the CCR is issued within 365 days of the violation). **See attached CCR and public notice templates.** Please note: if your PWS chooses to use alternate language it must be pre-approved by your MassDEP Regional Office.
- **If the PWS is a Non-community public water system (NTNC or TNC):** within one year (365 days) after learning of the violation in accordance with 310 CMR 22.16(4)(b) the system must issue the attached public notice or post the CCR statement when the CCR is provided by MassDEP. **See attached CCR and public notice templates.** Please note: if your PWS chooses to use alternate language it must be pre-approved by your MassDEP Regional Office.

**Please Note: Failure to submit required responses by the deadline noted on MassDEP's Violation Notification letter may result in enforcement actions.**

You can find information about EPA's and DEP Drinking Water Program enforcement discretion policy in the COVID-19 FAQs – Question (Permit2) located at <https://www.mass.gov/doc/massdep-covid-19-fags-for-public-water-suppliers-0>.

**Question (Sampling36): It seems that schools and day care facilities will not be open by June 30th. Just to confirm, per the FAQ the facilities scheduled for this monitoring period (2nd quarter) will be added to the next monitoring period (4th quarter)?**

Answer: These samples should be added to the next quarter or when the schools and daycares facilities are in session. See Question (Sampling25) of this document (<https://www.mass.gov/doc/massdep-covid-19-fags-for-public-water-suppliers-0/download>).

**Question (Sampling37): When will the LCR training be held?**

Answer: Training is proposed for late June/early July. MassDEP's Drinking Water Program will send out registration information.

**Question (Sampling38): If a PWS is on Lead and Copper Rule triennial monitoring and the schools or childcare facilities are closed when the PWS is doing its current**

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**monitoring, do you wait for the next three year period to sample the school or childcare or appropriately flush the schools and do the test now (after proper stagnation)?**

Answer: The PWS should first check to determine if other schools or childcare facilities in the community are opened and available to allow for the required samples from two sampling sites from two schools or childcare facilities as required by 310 CMR 22.06 B(7)(a)9.

If two schools and/or childcare facilities are not available to ensure there would be two sampling sites and the PWS would like to still test schools and childcare (even though it is not required by MassDEP while school and child care facilities are closed), the PWS must provide the Drinking Water Program with its proposed plan for simulating routine school operation flows and lead and copper sampling procedures for review and approval.

**Question (Sampling39): Despite the good guidance provided by DEP regarding lead sampling in schools, the guidance is still somewhat ambiguous. It seems clear if the school is fully closed, lead sampling is not required at this time. However, if the building is only partially open, say for administrators only, or open in a hybrid model where some days students are in and some days out, is lead sampling still required?**

Answer: Lead sampling is not required when a school is closed, but if the school is re-opened and water is available for use by some or all students, teachers or staff, then lead and copper sampling is required in accordance with existing Lead and Copper Rule (LCR) plans. Re-opened schools with voluntary sampling programs under the Lead Contamination Control Act (LCCA) are also encouraged to continue to sample when schools are re-opened, regardless of the level of school reopening operational status. See <https://www.mass.gov/doc/reducing-lead-and-copper-in-school-and-child-care-facility-drinking-water-before-re-opening/download>. Importantly, all schools are reminded to follow the DEP flushing guidance when schools are re-opened and to flush as needed to maintain fresh water. See <https://www.mass.gov/doc/lead-and-copper-best-practices/download>. Contact your regional LCR contact at MassDEP for all LCR questions and contact at [program.director-dwp@mass.gov](mailto:program.director-dwp@mass.gov) for LCCA questions and assistance.

**Question (Sampling40): Could you please confirm the Department's position on LCR sampling in schools when the PWS is on triennial monitoring – are the 2 schools to be monitored annually or on the same schedule as the other sampling (every three years)?**

Answer: Lead and copper samples for schools should be collected under normal operations after 8-18 hours of stagnation. Samples taken after buildings have been closed for long periods are more likely to show elevated levels of lead and/or copper. See FAQ (Sampling25) and (Inspections/Repairs5).

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- If a PWS is on triennial monitoring, per 310 CMR 22.06B (7)(a)9, the PWS is expected to collect the two samples per school from at least 2 schools or childcare facilities during the same period the PWS is collecting its LCR samples.
- PWS must check their sampling plan and check for all schools and childcare facilities in the community to determine if any are open and available for sampling during the period they are completing their triennial sampling.
- Even if a PWS is not required to collect the LCR triennial sample, the PWS may be assisting its local community/schools with LCCA monitoring. In this case, the PWS may wish to provide a plan for annual monitoring to ensure that 1/3 of all schools are monitored annually.
- If a PWS needs/wants to take samples when a school is closed or operating with low flows, the PWS should provide an email to the Drinking Water Program at [program.director-dwp@mass.gov](mailto:program.director-dwp@mass.gov) (Subject: LCCA School Monitoring) with its proposed plan for simulating routine school normal operation flows and lead and copper sampling procedures for review and approval before collecting sampling.

**Question (Sampling41): Does the most recent guidance on lead and copper sampling in schools/daycares also apply to schools and daycares that are their own PWS? Are those systems required to take the samples even if they are closed to the public due to COVID precautions? If they want to avoid a violation regardless, can they still sample lead and copper and would they have to follow the same L&C sampling guidance of providing DEP a plan to flush and sample the school / daycare before taking the samples? Would this also be applicable to other systems that are temporarily closed due to COVID but have Q3 requirements for L&C sampling?**

Answer: If a PWS closed due to the pandemic and is closed for the entire monitoring period during which LCR samples are required, then there is no requirement to collect these LCR samples and no violation would be issued. The PWS must ensure that it has reported its closure date to the MassDEP regional office so that its sample schedule can be adjusted. A PWS that was open for any part of the monitoring period is required to collect scheduled LCR samples and should follow the guidance on flushing to avoid being issued a violation.

## **Mosquito Spraying**

**Question (MosquitoSpraying1): Given the EEE threat, can DEP DWP explain their approach for pesticide sampling at public water system?**

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Answer: Spraying was conducted on August 10, 2020 in a portion of southeastern Massachusetts and is completed for the season. The approach used is basically the same every year and is designed to provide data that ensures that there are no impacts of public health concern to PWS and to assure the public of this. Raw and finished water samples from PWS systems drawing from active surface water sources within the aerial spray zones are collected and analyzed for the pesticide formulation's active pesticide and synergist. In addition, surface water sources of public drinking water supplies are excluded from the spray zone.

**Question (MosquitoSpraying2): What DEP outreach and coordination occur when spraying occurs?**

Answer: MassDEP notifies the PWS, DPH and local Board of Health of any confirmed detections above the reporting limit in finished drinking water samples. Detections that may present a public health risk will trigger rapid (same day) notification upon MassDEP receipt of results from the Pesticide Analysis Laboratory (PAL) at UMass Amherst. MassDEP relies on USEPA screening levels to assess potential public health risk. In last year's (2019) sampling, all results from finished (and raw) drinking water sources were either non-detect or far, far below levels of public health concern. Communications will be coordinated by MassDEP – between the Bureau of Water Resources with input from the Office of Research and Standards. MassDEP can assist PWS/local health officials with any necessary public communications.

**Question (MosquitoSpraying3): How can each PWS receive their raw water and finished water results, once validated by the lab?**

Answer: They can request results from MassDEP. MassDEP will notify PWS of any detections.

**Question (MosquitoSpraying4): What lab will be testing the samples for pesticide sampling? Mosquito-spraying Q&A**

Answer: The same lab was used as last year - the Pesticide Analysis Laboratory (PAL) at UMass Amherst.

## **Inspections and Repairs**

**Question (Inspections/Repairs1): What about Cross-Connection Inspections?**

Answer: Systems are usually required to inspect twice a year, with the next inspection due to be completed by the end of June 2020. MassDEP suggests that public water supplies evaluate their

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cross-connection control programs and reschedule any surveys or tests to a later in the year consistent with the state regulations, recognizing that we might have more guidance later.

Update 10-5-2020: Systems are required to test reduced pressure backflow preventers twice a year. This year an inspection was due June 30, 2020 and a the second by December 31, 2020. During this time backflow prevention tests may be delayed to a later date.

Cross-connection surveys must be conducted only on new facilities. Facilities that have an emergency or the facilities that have been retrofitted and required the replacement of piping or equipment or backflow preventer should reschedule any test to later in the year consistent with the state regulations, recognizing that MassDEP may continue to release more cross-connection program guidance.

**Question (Inspections/Repairs2): Can DEP give PWSs time extensions on paperwork deliverables, such as Sanitary Survey responses, Consumer Confidence Reports, cross-connection reports, and monthly chem sheets?**

Answer: MassDEP will consider these types of requests and will continue to re-evaluate circumstances throughout the spring and summer. Contact your regional office of MassDEP.

**Question (Inspections/Repairs3): Is there any guidance/recommendations regarding repair work (other than emergency work) with in the distribution systems?**

Answer: Public water systems should discuss priority projects with their MassDEP regions.

**Question (Inspections/Repairs4): Are MassDEP staff performing on-site inspections? We are planning to start up a new pump station within the next 4 weeks, but MassDEP is required to perform an on-site inspection prior to startup.**

Answer: Please stay in touch with MassDEP on time sensitive inspections.

**Question (Inspections/Repairs5): I'm hearing of some schools deciding to just shut their buildings down and lock the doors during this crisis. I'm not a big fan of this being I'm a licensed plumber and know too much about stagnant water. Does DEP have any guidance for schools here in MA regarding what they should be doing during these shut downs? At least during our summer breaks water is moving with all the cleaning going on. This is different as the water will be sitting anywhere from a minimum of 2 weeks and potentially longer.**

Answer: The potential for lead and copper to leach into water can increase the longer the water remains in contact with lead or copper in plumbing. As a result, facilities that closed their buildings due to COVID-19, may have elevated lead and/or copper concentrations.

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MassDEP's Lead Contamination Control Act (LCCA) Program, in coordination with the EPA's 3Ts program guidance on lead in school drinking water, recommends you perform a thorough flushing of your drinking water pipes and fixtures prior to re-opening your facility. For guidance on school flushing see [https://www.epa.gov/sites/production/files/2018-09/documents/flushing\\_best\\_practices\\_factsheet\\_508.pdf](https://www.epa.gov/sites/production/files/2018-09/documents/flushing_best_practices_factsheet_508.pdf). Also, MassDEP currently has free technical assistance and testing available for drinking water in schools and childcare facilities and encourages all schools and childcare facilities to participate in the program. See <https://www.mass.gov/service-details/technical-assistance-in-2020-for-lead-in-school-drinking-water>. If you have any questions please contact the MassDEP Drinking Water Program at [program.director-dwp@mass.gov](mailto:program.director-dwp@mass.gov) Subject: Lead in School or contact our technical assistance partner, UMass, at [lccadep@umass.edu](mailto:lccadep@umass.edu) or 413-545-0840.

**Question (Inspections/Repairs6): What about biannual flushing?**

Answer: Normal water system operational activities, such as routine flushing, may still occur.

**Question (Inspections/Repairs7): Can DEP give PWSs time extensions on Annual Statistical Reports?**

Answer: MassDEP will extend the deadline for filing Annual Statistical Reports from April 30 to July 1 but encourages public water systems to file as soon as possible.

**Question (Inspections/Repairs8): What if a reduced pressure zone backflow (RPBP) device on a residential fire sprinkler systems fails? The device may fail during a dirty water event or water break. The relief device could fail catastrophically dumping as much water as can fit through a one-inch line. Public Water Suppliers are not allowed to stop water at a fire sprinkler without a permit from the fire department. Can the Fire Department waive the permit to allow the Public Water Supplier to shut off the stream at the curb and then notify the Fire Department?**

Answer: Under Mass General Law chapter 148 section 27A (<https://malegislature.gov/laws/generallaws/parti/titlexx/chapter148/section27a>) a PWS can shut off water to a residential fire sprinkler system "for the purpose of making necessary repairs or preventing freezing or other property damage; provided, however, that the head of the fire department is notified immediately of such emergency action." The head of the fire department shall also be notified when the system, main, hydrant or other device is placed back in service.

**Question (Inspections/Repairs9): Reduced pressure backflow preventers) must be tested twice per year. Many facilities are closed and or not allowing access. Will we be in violation if we are unable to test these devices?**

Answer: For RPBPs that are installed in facilities that have closed or where outside parties are not being granted access during the current emergency, the two times per year frequency of testing is

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changed this year only to one time per year except for RPBPs where the PWS is aware that it is failing or if a water supply emergency occurs at the facility. Keep in mind that RPBPs at facilities that use water for less than six months of the year are only required to be tested once and that although the two annual routine tests must normally be at least five months apart MassDEP, its designee or the PWS may issue a written approval to allow these two tests to occur closer together.

**Question (Inspections/Repairs10): Schools are closed during this crisis. As a licensed plumber, I am concerned about stagnant water. Does DEP have any guidance on what schools should do during these shut downs? During summer, water moves and cleans the pipes - unlike now when systems are closed. The potential for lead and copper to leach into water can increase the longer the water remains in contact with lead or copper in plumbing. As a result, facilities that closed their buildings due to COVID-19, may have elevated lead and/or copper concentrations.**

Answer: MassDEP's Lead Contamination Control Act (LCCA) Program, in coordination with the EPA's 3Ts program guidance on lead in school drinking water, recommends that schools perform flushing throughout their drinking water pipes and fixtures prior to re-opening the facility. For guidance on school flushing see [https://www.epa.gov/sites/production/files/2018-09/documents/flushing\\_best\\_practices\\_factsheet\\_508.pdf](https://www.epa.gov/sites/production/files/2018-09/documents/flushing_best_practices_factsheet_508.pdf). Also, MassDEP currently has free technical assistance and testing available for drinking water in schools and childcare facilities and encourages all schools and childcare facilities to participate in the program. See <https://www.mass.gov/service-details/technical-assistance-in-2020-for-lead-in-school-drinking-water>. If you have any questions please contact the MassDEP Drinking Water Program at [program.director-dwp@mass.gov](mailto:program.director-dwp@mass.gov) Subject: Lead in School or contact our technical assistance partner, UMass, at [lcadep@umass.edu](mailto:lcadep@umass.edu) or 413-545-0840.

**Question (Inspections/Repairs11): What are some actions that schools, and early education and care facilities interested in addressing lead in drinking water can still take (remotely) while they wait to re-open?**

Answer: There are several optional actions that schools and facilities can take now to prepare themselves for when they reopen and MassDEP's Expanded Assistance Program full resumes. These include:

1. Apply for full participation in the Expanded Assistance Program, which includes free technical assistance and lead in water testing. Go to: [www.mass.gov/assistance-program-for-lead-in-school-drinking-water](http://www.mass.gov/assistance-program-for-lead-in-school-drinking-water)
2. Update the facilities' information on lead in drinking water testing and remediation actions on MassDEP's online management tool. Go to: <https://script.google.com/macros/s/AKfycbxP99K-Cd5B3ioE7nswN0peOEndcGrXwV6zJcS5iHxzGO55B1k/exec>
3. If the schools have not used MassDEP's online management tool, they should learn more about it and apply for access to it at the link in #2.
4. Learn about the MA Clean Water Trust's School Water Improvement Grant (SWIG) program, which provides funding for the purchase and installation of filtered water bottle filling stations in eligible public schools and public early education and care facilities. Go to: [www.mass.gov/swig](http://www.mass.gov/swig).

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**Question (Inspections/Repairs12): Will there be any special provisions for 2020 ASR regarding cross connection testing (i.e. special tracking codes to denote lack of access/closures due to COVID-19).**

Answer MassDEP provides a form for Public Water Supplier (PWS) to document any non-compliance as a result of the COVID-19 pandemic (<https://www.mass.gov/media/2131936/download>). At a minimum, PWSs must prove that there has not been an intentional lapse in compliance; but that noncompliance was a result of issues resulting from COVID-19, such as staffing or contracting and laboratory resources outside of the facilities' control. In advance of the availability of the form, a PWS may document its action by responding to the questions listed below and submitting the documentation to its MassDEP Regional Drinking Water Program or to [program.director-dwp@mass.gov](mailto:program.director-dwp@mass.gov). Subject: [Region] Covid-19 non-compliance justification.

The justification documentation must include the following information:

1. Date of Non-compliance
2. Nature of noncompliance: The violation as to which the PWS failed to monitor, report, test, or sample.
3. Identify how COVID-19 was the cause of the noncompliance
4. Steps taken to minimize the effects and duration of noncompliance
5. Additional actions taken in response
6. Was return to compliance as soon as possible? Please explain.
7. If return to compliance was delayed or not possible, please explain and include the anticipated needed duration for compliance.

**Question (Inspections/Repairs13): Will there be any accommodations made for testing reduced pressure backflow preventers devices once annually instead of the required twice annually? Relaxing the five-month separation in tests is helpful but we still foresee situations where two tests in one year are going to be a challenge due to lack of staff and a shortened timeframe.**

Answer: The requirement is to conduct two Reduced Pressure Backflow Preventer (RPBP) tests in a year with a five-month separation between tests. The public water supplier is already able to choose to allow these tests to occur closer together. Therefore, the two RPBP tests could be conducted later this year. Failure to complete two RPBP tests in 2020 will be a violation; however, for RPBPs that are installed in facilities that have closed or where outside parties are not being granted access during the current emergency, the two times per year frequency of testing is changed this year only to one time per year except for RPBPs where the PWS is aware that the device is failing or if a water supply emergency occurs at the facility. Public water suppliers must maintain a list of every location and device where RPBP testing was reduced to one time per year during this emergency and the specific

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reason for the reduction (e.g. "Building closed from xx/xx/xxxx to xx/xx/xxxx due to COVID-19 emergency," or "Building inaccessible from xx/xx/xxxx to xx/xx/xxxx, see copy of notice received on xx/xx/xxx from facility owner"). This list with supporting documentation must also be submitted to MassDEP no later than 12/31/2020 at [program.director-dwp@mass.gov](mailto:program.director-dwp@mass.gov), subject: Cross Connections. The Double Check Valve Assemblies (DCVA) test, required once per year, can be performed later in the year.

**Question (Inspections/Repairs14): Will DEP be doing sanitary surveys?**

Answer: We have suspended inspections for all but emergencies and imminent needs to ensure that infrastructure is working properly. We are working to ensure that our approach to resuming inspections is consistent with the Orders, the best public health information, and having proper protocols in place

**Question (Inspections/Repairs15): I would ask that if and when priority testing becomes available that licensed backflow testers and surveyors are included. The nature of testing puts us in front of a varied and large group of folks daily.**

Answer: We will work to be inclusive of the description of people working on the many aspects of water and wastewater operations and compliance.

**Question (Inspections/Repairs16): Do PWS have to conduct RBP testing, normally conducted in the first part of the year? Is one test in this calendar year acceptable?**

Answer: This question was previously answered. See answers to questions (Inspection/Repair9) and (Inspection/Repair13) .

**Question (Inspections/Repairs17): If there is a non-responsive meter and the utility is trying to get in and replace that meter, but a resident homeowner is refusing to allow entrance to replace it, what is a utility supposed to do?**

Answer: During the current pandemic, we understand that PWSs may have difficulty scheduling meter replacements due to resident or operator concerns for COVID-19. Old inaccurate meters do not allow a PWS to accurately bill customers and result in inefficiencies in utility operations to collect consumption data and revenue and should be replaced. We also understand that prior to the pandemic that PWS also had difficulty scheduling some meter replacements for a variety of reasons. PWS should continue to use the pre-COVID-19 procedures they developed to address this issue, that do not contravene the Governor's orders. These procedures may have included education and the use of local requirements and bylaws to provide estimated bills until the meter is replaced. We encourage PWS to work with other PWS that have successfully implement programs to encourage residents to replace meters. PWS may also find the information in the AWWA-Raftelis Report on Financial Impact of the COVID-19 Crisis on U.S. Drinking Water Utilities useful:

[https://www.awwa.org/Portals/0/AWWA/Communications/AWWA-AMWA-COVID-Report\\_2020-04.pdf](https://www.awwa.org/Portals/0/AWWA/Communications/AWWA-AMWA-COVID-Report_2020-04.pdf).

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**Question (Inspections/Repairs18): Could DEP provide guidance on changing out the filter in bottle filling stations when opening after COVID? With DEP providing facilities managers with recommendations on flushing building plumbing it might be pertinent to have them include a recommendation to change the filters in bottle filling stations after premise plumbing flushing has been completed.**

Answer: MassDEP recommends building owners/operators remove point-of-use (POU) filters and replace them after flushing. This will limit the amount of sediment that could have been trapped during flushing and could be a potential source of contamination. Some types of water treatment devices may need to be disinfected or replaced before being used. Check with the manufacturer for details. This guidance applies to bottle filling stations. For more information regarding flushing see <https://www.mass.gov/doc/massdep-building-flushing-information/download>.

**Question (Inspections/Repairs19): With little to no use in the schools, newer low flow toilets may be an issue. These toilets use flowmeters which recharge each time it flushes but with the shutdown they haven't been used. Most have a secondary program where it self-flushes to charge its battery. The issue we had was the flowmeter got stuck open for roughly 9 days at 30 gallons per minute. This adds money to both water, sewer and schools at a time when budgets are going to tight. You may want to reach out to your schools and have them, if they aren't already, start doing daily meter record to watch for any large increases in water usage.**

Answer: MassDEP will assist in raising awareness of this issue and will notify schools and others.

**Question (Inspections/Repairs20): Is there information from other DPWs about how to address the cleaning/disinfection of equipment/tools used during responses to water main breaks or sewer plugs (i.e. on-site disinfection, disinfect between each use at job site, disinfect all items upon return to barn, etc.) where multiple staff members may be in contact with items?**

Answer: MassDEP has not collected this information but recommends that public water suppliers follow the appropriate PPE and safety requirements and protocols for this work. Each PWS should have such procedures in place.

**Question (Inspections/Repairs21): For the past few months, systems have been backlogging "non-essential" services such as dead meter and elective valve change outs. Is there any guidance as to when these non-essential interior services should resume and if so, how PPE should be used or other precautions that should be taken?**

Answer: PWS must follow the Mass reopening plan. See <https://www.mass.gov/info-details/reopening-massachusetts>. We will also check for and provide you with any additional guidance when it becomes available.

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**Question (Inspections/Repairs22): What is MassDEP’s plan for sanitary surveys?**

Answer: MassDEP plans to contact all 348 PWS scheduled for sanitary surveys in 2020.

- MassDEP is required by EPA to conduct surveys as follows:
  - Community Systems - Every 3 years
  - Community Systems with outstanding performance (e.g. no violations for 5 years) - Every 5 years
  - Non-Community Systems (NTNC and TNCs) - Every 5 years
- MassDEP will also use all available tools, including remote tools, to attempt to evaluate the eight elements of a sanitary surveys for each of these PWSs in 2020.
- Remote tools may include review of pictures, videos, close communication with certified operator using e-conferencing tools like face time, Zoom, Go to meetings, etc.
- DEP anticipates working closely with certified operators to complete each sanitary survey, including TNC certified operators performing self-audits as allowed by 310 CMR 22:04(12)(b) for TNCs.
- **If an on-site visit is determined by MassDEP to be vital to protecting public health** both the PWS and DEP staff will be expected to answer standard COVID-19 worker safety questions, wear appropriate PPE, be physical distanced and follow all other safety measures. These safety measure will be provided to the PWS for sign off prior to any on-site sanitary survey.

**Question (Inspections/Repairs23): What further guidance can MassDEP provide on Cross-Connection Inspections (Backflow Preventers Tests and Cross Connection Surveys)?**

Answer: Public Water Systems are usually required to test reduced pressure backflow preventers twice a year. MassDEP suggests that public water supplies evaluate their cross-connection control program plans (CCCP) at this time. If necessary, Public Water Systems can make updates to their CCCP to reflect any temporary changes on specific components of the program because of the COVID restrictions, such as rescheduling any cross-connection surveys or tests to later in the year, consistent with the state regulations. Please be aware that the MassDEP may update its guidance later this year.

Public Water Systems may choose to temporarily conduct cross connection surveys only on:

- new facilities,
- facilities that went through a major remodeling/upgrades and
- facilities that have had an emergency that required the replacement of equipment or changes on the domestic plumbing system.

Public Water Systems may temporarily alter testing frequencies by:

- Suspending tests of double check valve assemblies (DCVAs) located on fire protection systems in 2020.
- Only testing RPBP located on fire protection systems during the second half of 2020.

All cross-connection surveys or testing must be conducted using appropriate notifications and Personal Protective Equipment (PPE) according to CDC

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guidance. <https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html>.

Please also refer to FAQ Question (Inspections/Repairs1).

**Question (Inspections/Repairs24): Is there any update to what the Sanitary Survey process is going to look like? Is there anything folks can do to prepare now to assist in the process? We want to make sure we have the right resources and are comfortable with live video conference on our phones if required for the surveys.**

Answer: MassDEP will contact each PWS that is scheduled for a sanitary survey this year and will provide specific details on how to prepare for either a remote evaluation and/or an on-site visit with appropriate COVID-19 safety protocols.

**Question (Inspections/Repairs25): Does MassDEP have any more guidance on resuming/conducting backflow inspections?**

Answer: Our guidance remains the same for now. If a PWS is prepared to conduct cross connection activities (i.e. staff are available and have access to appropriate PPE), then the PWS may consider reaching out to facilities that have cross-connection devices and ask if PWS staff/contractors can access the facility to test existing devices. PWS staff/contractors should identify and follow any access protocols that may have been put in place at each facility including recommendations from the CDC and Mass DPH.

**Question (Inspections/Repairs26): I was approached by our backflow testing company who is seeking to delay testing of our low hazard DCVA to 2021 as described in paragraph 2 of the MassDEP PWS COVID FAQs (Inspections/Repairs1). If we delay DCVA testing until 2021, do we need to submit a non-compliance form as described in Question (Inspections/repairs12)? Would delaying DCVA be considered “non-compliance” if DEP has amended the compliance protocol?**

Answer: If a PWS delays DCVA testing until 2021, it must submit a non-compliance form as described in Question (Inspections/Repairs12). If the PWS submits the non-compliance form, then delaying DCVA will not be considered a violation.

**Question (Inspections/Repairs27): Is it acceptable to complete the first RPZ backflow test for 2021 in January or February? Some devices will only be two months after our last RPZ test in 2020.**

Answer: The requirement at 310 CMR 22.22(13)(f) is to conduct two Reduced Pressure Backflow Preventer (RPBP) tests in a year with a five-month separation between tests. The public water supplier is already able to choose to allow these tests to occur closer together. MassDEP suggests

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that public water suppliers evaluate their cross-connection control programs testing component and schedule any tests to a later in the year consistent with the state regulations.

If a water supplier cannot perform backflow test due to COVID-19, it should document any non-compliance as a result of the COVID-19 pandemic using the COVID-19 noncompliance form (<https://www.mass.gov/media/2131936/download>).

**Question (Inspections/Repairs28): When, how and where the COVID-19 noncompliance form for the CCCP must be submitted?**

Answer: The completed Covid-19 noncompliance form for the CCCP must be submitted by March 30th as a hardcopy to the Regional MassDEP Office and as an electronic PDF attachment to [program.director-dwp@mass.gov](mailto:program.director-dwp@mass.gov). If you do not submit an electronic PDF copy prior to filing the eASR you must attach an electronic PDF copy to the 2020 e-ASR (When you are notified by email of the eASR submission date).

**Question (Inspections/Repairs28): What is DEP's position on backflow testing and cross-connection surveys for 2021? Are you still in compliance if you only do one backflow test in 2021?**

Answer: As non-residential facilities return to operating at some normal levels, PWSs are expected to complete all surveys and testing according to the regulations unless there is a documented pandemic-related reason for not conducting these drinking water distribution and public health protection surveys and tests. Please see FAQ question Inspections/Repairs13 at <https://www.mass.gov/info-details/massdep-covid-19-resources-for-water-suppliers-and-wastewater-operators>. For specific cross-connection control questions, please contact your MassDEP regional drinking water program contact.

## Reporting

**Question (Reporting1): Traditionally, mail/hand/faxed is the acceptable means of reporting. With its staff working remotely from home, what is MassDEP's expectations of reporting going forward? Will there be identified contacts to email the reports to in each region with the expectation a copy is also going in the mail as well? And if systems' administrators also have to work from home, will the mail-in requirement be temporarily lifted and email deemed acceptable until further notice? We want to make sure reporting still takes place and the appropriate people in each region are receiving it.**

Answer: MassDEP already has been allowing certain reports to be emailed to [program.director-dwp@mass.gov](mailto:program.director-dwp@mass.gov). We will expand this to all reports. The subject line should include the PWSID, City/Town and type of report (e.g. 3035000 Boston Bacteria Report). Continue to mail the official

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hardcopy to the appropriate MassDEP Regional office but indicate on the cover letter or similar enclosure that the report(s) was sent in via email and include the date of the email.

**Question (Reporting2): Is the use of electronic signatures allowed?**

Answer: Reports that are submitted via email during this emergency can be signed electronically. When the Public Water Supplier is able to access paper copies and the post office, it should also send hard copies of the reports through the mail.

**Question (Reporting3): Can water system hand-deliver reports?**

Answer: MassDEP offices are currently closed, but staff is working remotely and has made arrangements to process US mail deliveries. It is okay to mail reports or submit electronically through email or eDEP.

**Question (Reporting4): Can MassDEP accept water quality laboratory reports electronically? Where can we electronically send Drinking Water reports?**

Answer: MassDEP suggests that laboratories switch to using eDEP, which is available, for all the reports it can receive electronically. MassDEP staff has remote access to eDEP and is retrieving uploads daily.

To facilitate the receipt of water quality reports and other information that would otherwise be hand delivered or sent via the US Post Office the DWP will allow PWSs and Laboratories to make these submittals via email to [program.director-dwp@mass.gov](mailto:program.director-dwp@mass.gov). PWSs and Laboratories will still be expected to mail an official copy of all such reports to the appropriate MassDEP regional office and should note in the cover letter or similar enclosure that the enclosed reports have been submitted via email.

Please start the subject with "[PWS ID#] [City/Town] [Type of Drinking Water Report]" for example: "3035000 Boston Bacteria Report."

The PWS should mail the official hardcopy to the appropriate MassDEP Regional office when is can access the post office but indicate on the cover letter or similar enclosure that the report(s) was sent in via email and include the date of the email.

**Question (Reporting5): Are report submittals still due on the 10<sup>th</sup> of each month following the reporting period?**

Answer: Yes. EPA has indicated that all such regulatory requirements remain in place. If you have a COVID related issue that will affect your ability to file, let MassDEP know.

**Question (Reporting6): With DEP working remotely where can we electronically send information for the Well Driller Program?**

Answer: The Drinking Water Program will be accepting all Well Driller Program applications and requests for information by email. Please send all mail to [program.director-dwp@mass.gov](mailto:program.director-dwp@mass.gov) : Subject Well Driller -[insert program area]. You may choose from the following list of program areas: New

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Driller Applications, Driller Recertification Applications, Well Completion Reports, Well Completion Report Correction Forms and Other/General information."

**Question (Reporting7): I am wrapping up the CCR and completing Section F of the Certification form, "Good Faith Delivery Methods." We deliver to public places - City Hall, DPW, library, and schools and even though I can go and deliver to these places, they are closed to the public currently. So, can I still check off that they are posted in these public places?**

Answer: Please use other Good Faith Efforts. For example, Public Service Announcement (PSA). EPA has been clear that all regulatory requirements must be met or a violation will be recorded. 310 CMR 22.06B (15) included examples of Good Faith Efforts:

The Community Water System must make a good faith effort to reach consumers who do not get water bills, and are required to take a minimum of three of the following actions:

- (a) Post report in the lobby of apartment complexes;
- (b) Place an ad in a local newspaper stating where copies are available;
- (c) Announce availability of the consumer confidence report on local radio stations;
- (d) Post consumer confidence report in Town Hall;
- (e) Place copies of the consumer confidence report in the local public library;
- (f) Post a notice (in main lobby of apartment complexes) stating that the consumer confidence report is posted on a website, and give the website address;
- (g) Publish the report in local newspaper(s);
- (h) Deliver the report to community organizations.

Several of these options can be accomplished via mail/email. In addition, if there are local apartment complexes where you usually leave copies you could try to identify a building manager to whom you could mail copies (a) or a notice (e) for posting. Please contact your regional MassDEP or Boston office CCR staff for assistance.

**Question (Reporting8): A lot of the good faith delivery options under the electronic delivery choice are not available currently due to the state's response to COVID-19. I cannot leave hard copies in the general areas, BOH, Library, Police Station nor Town Hall. We will have it up on the digital sign board and the notice will be on the bills. How do we fill out the delivery certification form? Will we be given dispensation if we cannot meet the total requirements of the good faith efforts portion?**

Answer: See above answer and identify and use other Good Faith Methods. Keep in mind that the intent of good faith efforts is to reach non-billpaying consumers so a bill stuffer would not reach this audience. Please contact your regional MassDEP office or Boston CCR staff for assistance.

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**Question (Reporting9): I hand out Consumer Confidence Reports (CCRs) and explain them when I survey businesses. Can that action be considered a good faith action by our water utility? Most of the folks I reach are employees in companies or folks that live in other towns.**

Answer: It is a great idea to use every opportunity, including cross connection surveys, to educate the public about drinking water. MassDEP encourages you to continue to use your CCR for educational purpose. However, the intent of the CCR good faith effort is to distribute CCRs within the same timeframe that the CCRs are being delivered to bill-paying customers. If you are talking about cross-connection surveys you do over the course of 12 months, then that would not meet the good faith efforts. Please contact your MassDEP regional or Boston office CCR staff for assistance.

**Question (Reporting10): Are digital sign boards considered a good faith effort for purposes of CCR?**

Answer: Digital sign boards are a great way to educate the public about drinking water. However, how you use sign boards will determine if you have met the intent of the good faith efforts for CCR requirements. If you are using signboards in areas of heavy city/town traffic or other highly public areas with a URL to access a CCR, it could be considered a good faith effort. But, a plan for a stationary sign board that is attached to the water utility's building would not be considered a good faith effort, because it is not actively in the public eye and telling people where to access information. Please contact your MassDEP regional or Boston office CCR staff for assistance.

**Question (Reporting11): What is required for proof of good faith effort for CCR?**

Answer: See the Consumer Confidence Report Certification Form at <https://www.mass.gov/doc/consumer-confidence-report-certification-0/download>. You would simply describe what you did on the form, sign the certification section and submit the form to MassDEP. For example, if you used a mobile sign board, you could list the dates that you had the sign board(s) out and location(s) where they were placed.

**Question (Reporting12): What is DEP's expectation for systems mailing hard copies of electronically submitted reports?**

Answer: If reports are submitted via eDEP, then no hard copy submission is required. If reports are submitted via email to [program.director-dwp@mass.gov](mailto:program.director-dwp@mass.gov), then a hard copy must still be mailed to the appropriate MassDEP's Regional Office. Hard copy submittals must be received by MassDEP within the required timeline (e.g. as per 310 CMR 22.15(2): Unless a shorter reporting period is prescribed elsewhere in 310 CMR 22.00, the Supplier of Water shall report to the Department the results of every test, measurement or analysis the Supplier of Water is required by 310 CMR 22.00 to make, within the shorter of the following time periods: (a) the first ten days following the month in which the results are received; or (b) the first ten days following the end of the required monitoring period as stipulated by the Department.).

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**Question (Reporting13): Reports have to be delivered by the 10th of the month, I am wrapping up with my submittal this morning, and regular mail is so slow it won't get there in time, so I'll have to overnight them. It normally takes 3 business days for my submittal to get to DEP. Has DEP considered adding a drop-box location or something to hand deliver reports to the Regional Offices?**

Answer: No drop box is available but MassDEP encourages PWS to use eDEP for all appropriate monitoring reports and MassDEP continues to allow PWSs to send reports by email to [program.director-dwp@mass.gov](mailto:program.director-dwp@mass.gov). When sending reports by email the subject line should include the PWSID, City/Town and type of report (e.g. 3035000 Boston Bacteria Report). When using email, the PWS should also continue to mail the official hardcopy to the appropriate MassDEP Regional office but indicate on the cover letter or similar enclosure that the report(s) was sent in via email and include the date of the email.

**Question (Reporting14): What happens when a PWS mails monthly reports to the MassDEP office that are due on the 10th, if the 10th falls on a weekend? Will MassDEP still accept the mail on Saturday and would the report be considered as submitted on time? Will DEP consider adding drop-off boxes at its regional offices?**

Answer: The regulations require that PWSs report to the Department within "(a) the first ten days following the month in which the results are received; or (b) the first ten days following the end of the required monitoring period..." MassDEP interprets this to consider mail postmarked by the due date to be on-time. At this time, MassDEP offices remain closed to the public. However, even prior to the pandemic, our offices were not open on weekends but mail received on the next business day that is postmarked by the due date is considered on time. At this point there has not been any investigation into whether drop-off boxes would be feasible – keep in mind that MassDEP leases four of its five offices and would be subject to any limitations imposed by these landlords.

MassDEP encourages PWS to use eDEP for all appropriate monitoring reports and continues to allow PWSs to send reports by email to [program.directordwp@mass.gov](mailto:program.directordwp@mass.gov). When sending reports by email the subject line should include the PWSID, City/Town and type of report (e.g. 3035000 Boston Bacteria Report). When using email, the PWS should also mail the official hardcopy to the appropriate MassDEP Regional office but indicate on the cover letter or similar enclosure that the report(s) was sent in via email and include the date of the email.

**Question (Reporting15): When will the eASRs be released this year?**

Answer: The 2020 eASR release is planned for February 8, 2021 with a due date of April 8, 2021. We will inform you directly by email when the ASR are available and you will receive two months to provide your submittal. If you do not currently receive emails from the DWP program Director at [program.director-dwp@mass.gov](mailto:program.director-dwp@mass.gov) please send us your email address.

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Update 2/3/2021: The eASR goes online on February 8, 2021 and is due by April 8, 2021.

**Question (Reporting16): Has there been any update to the CCR requirements moving to delivery twice per year?**

Answer: The America's Water Infrastructure Act (AWIA) has a provision for Consumer Confidence Reports (CCR) to be made and delivered twice per year by community systems over 10,000 population. It was to take effect this past October 2020. EPA is required to issue regulations to implement this provision. To date, EPA has not provided regulations or directives on this AWIA provision. Therefore, for the calendar year 2020, CCRs must be delivered once per year by the deadline of July 1, 2021.

**Question (Reporting17): The form that MassDEP has issued to demonstrate that a PWS has taken three best faith efforts for distributing the Consumer Confidence Report is confusing. For example, does a PWS get credit for more than one best faith effort if it can check off more than one use of the news media (choices are radio, newspaper, television/cable, social media, and digital signboard)?**

Answer: Each box on the far left of the form is one action and three must be selected. Therefore, even if multiple news media are used to publicize the CCR, the PWS will get credit for only one best faith effort taken in this category. MassDEP acknowledges that there is some confusion regarding this form and will review and revise it, as needed.

## Staffing and Licensure

**Question (Staffing1): Can systems avoid receiving notices of non-compliance for staffing shortages if the facilities have SCADA systems in place?**

Answer: 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.

**Question (Staffing2): What if operators at small systems are unavailable due to illness?**

Answer: 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 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.

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**Question (Staffing3): What can a system do if it does not have enough operators?**

Answer: All water and wastewater treatment facilities should follow their existing Emergency Response Plan as it related to continuation of operations in the event of an emergency; these should include 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 and file for temporary emergency certification (see questions 5 and 6 below), if necessary. Regional staff can review and determine if staffing is sufficient and assist in developing contingencies, if possible.

**Question (Staffing4): For public water systems that require daily or weekly visits, will there be any leeway with limiting site visits or decreasing the number of visits required due to staffing issues or exposure to the public risks?**

Answer: The certified operator or designated staff should only conduct visits to ensure safe drinking water priority tasks are accomplished, for example, sampling water quality and responding to water quality/equipment complaints. Visits that do not involve sampling are not required at this time. Contact MassDEP regional staff for assistance.

**Question (Staffing5): What else can a system do to increase its number of operators?**

Answer: 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, 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.

**Question (Staffing6): 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 Division of Professional Licensure extend deadlines for getting contact hours? Can MassDEP provide opportunities for online training?**

Answer: MassDEP is currently considering options to host training classes online to make up for recent course cancellations, if needed. In addition, MassDEP will be consulting with DPL on identifying any authority to extend license terms.

**Question (Staffing7): 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?**

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

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**Question (Staffing8): Is there any recommendation on staffing? Should we be splitting up our crews and licensed operators? Should we only be going out on emergency calls and for sampling?**

Answer: MassDEP encourages and supports all actions to ensure the continuity of safe drinking water during this emergency period. Public water systems should take all actions they determine to be necessary to provide safe drinking water during this period and inform their MassDEP regional office of such plan/actions.

**Question (Staffing9): If communities or the state begin shelter in place, how can we assure contract operators (private companies) will be able to travel freely about to collect samples. Can Licensed Water Operators be deemed “essential” and able to travel regardless of whether they are a private entity? Who makes this determination?**

Answer: On March 23, 2020, Governor Baker listed water system and wastewater system operations as essential functions.

**Question (Staffing10): Can an Operator in Training (OIT) be granted full status to help fill in needs for operators?**

Answer: MassDEP’s regulations allow for an OIT to act in this capacity during an emergency. Contact [michael.maynard@mass.gov](mailto:michael.maynard@mass.gov) for more details.

**Question (Staffing11): How can we get more licensed operators?**

Answer: DEP has worked with the Division of Public Licensure to update the pathway for obtaining a Temporary Emergency Certification. This will enable a public water supplier to identify a potential operator, such as someone whose license has expired, recently retired, or someone who is already familiar with the facility, or is a professional engineer.

The public water system should complete the “Temporary Emergency Certification Application” <https://www.mass.gov/doc/temporary-emergency-certification-application-0/download> and email it to [drinkingwaterboard@mass.gov](mailto:drinkingwaterboard@mass.gov) with a cc to: [michael.maynard@mass.gov](mailto:michael.maynard@mass.gov) and [program.director-dwp@mass.gov](mailto:program.director-dwp@mass.gov). Subject: Temporary Emergency Certification Application. Also send a hard copy to address on the form.

**Question (Staffing12): What steps should be taken if the operator’s license has recently expired?**

Answer: DPL will be re-mailing notices to those operators who did not renew on 12/31/19 to remind them to do so.

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The Division of Public Licensure and MassDEP will host a webinar on Friday, April 10 at 11:00 am to demonstrate how to renew online. Details of how to register will be included with the renewal letter and are presented below:

Visit <https://statema.webex.com/> and enter the meeting ID 618 091 880, and password "Water2020" to join.

Here is the tentative agenda for the meeting:

1. Introduction and Purpose
2. Walk through the job-aid (Attached)
3. Open to Q&A

DPL isn't accepting paper renewals.

Operators who have any issues with on-line renewal should send an email to [drinkingwaterboard@mass.gov](mailto:drinkingwaterboard@mass.gov) and leave contact information so that DPL can call them back.

**Question (Staffing13): Can we get fee relief from the Division of Public Licensure (DPL)?**

Answer: DPL is not able to waive the licensing fees. However, it is able to - and will - waive late fees for those who renew their licenses now.

**Question (Staffing14) For MA WARN, who is the acceptable signatory on the agreement?**

Answer: MA WARN. MA WARN is a *voluntary* organization intended to provide mutual aid to water utilities during emergencies. Participation can be declined by a member for any particular emergency and withdrawal from MA WARN can be done at any time with notice to the group's representative.

Here is the MA WARN website: <http://portal.mawarn.org/Home.aspx>

Here is a general brochure about MA WARN: <http://portal.mawarn.org/Portals/0/MA-WARN%20Brochure%20Revised%20May%202010.pdf?ver=2017-04-24-100420-920>

SIGNATURE AUTHORITY TO BIND THE UTILITY. The person or persons authorized to sign and bind a public utility may not be the same for each system, so the first step in joining MA WARN would be identifying an authorized person to sign. This may be the board of commissioners for a utility, a DPW superintendent, water commissioner, city council or mayor or board of selectmen or town manager.

RELIEF UNDER STATE OF EMERGENCY. There has been no general declaration that changes or relieves any signatory requirements for municipal agreements, so in order to join MA WARN a

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signature on behalf of the utility is needed to demonstrate the utility's intention to join. MA WARN has published on its website a template for a utility to express its intent to join- but has not provided advice about electronic signatures. The template can be found here:

<http://portal.mawarn.org/Portals/0/MA%20WARN%20FINAL%202007.pdf?ver=2017-04-24-100420-920> No signature block is reserved for MA WARN to accept the agreement.

MassDEP's recommendation is to obtain a signature of an authorized person for your utility on the template membership agreement, and provide MA WARN with notice that the utility intends to join and has signed the membership agreement. Sending an electronic copy of the signed template form should serve as notice of the utility's intention to join. New England Water Works coordinates MA WARN membership, Please contact Kirsten King at 508-893-7979 or [kirsten@NEWWA.org](mailto:kirsten@NEWWA.org).

**Question (Staffing15): How does a utility keep its plant online if a worker becomes ill from COVID-19?**

Answer: The provision of drinking water is an essential public health service. If a public water system has an employee has become ill from COVID-19, it should work with its local Board of Health to determine how to decontaminate the workplace and continue operation.

**Question (Staffing16): Water systems are shifting staffing schedules. Can DEP weigh in on schedules?**

Answer: A water supplier is encouraged to get in touch with its regional MassDEP office to describe any changes and review measures to ensure continuity of service.

**Question (Staffing17): During the shelter at home, does a licensed operator need to be physically in the town of responsibility?**

Answer: Since water and wastewater operators are deemed "essential," they should be free to travel to their workplaces. Also, a primary or secondary operator may use appropriate electronic tool to supervise staff.

**Question (Staffing18): Do water and wastewater workers need to travel with their ID badges?**

Answer: MassDEP recommends that water supply and wastewater staff travel with their ID badge.

**Question (Staffing19): If a water or wastewater operator is quarantined, can co-workers get prioritized for testing?**

Answer: In such a circumstance, please be in immediate contact with your local health and emergency management officials to see what arrangements can be made for testing and follow-up measures.

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**Question (Staffing20): Are administrative and financial staff of water and wastewater utilities considered essential staff under Governor Baker’s order of March 23, 2020 (Exhibit A)?**

Answer: MassDEP has reviewed Exhibit A and discusses the question here. It should be noted that the Governor's Order encourages alternative work arrangements where possible. Where it isn't, these types of office and communication support functions appear to be covered in three different sections of Exhibit A:

**Water and Wastewater**

It includes “[e]mployees needed to operate and maintain public and private drinking water and wastewater/drainage infrastructure, including” and "operational staff, technical and support staff for SCADA systems and workers that maintain digital systems."

**Public Works**

Includes workers who "support the operation, inspection, and maintenance of essential public works facilities and operations”, including water and sewer.

**Other Community-Based Essential and Government functions**

Includes "local" “employees who support Mission Essential Functions and communications networks” and “workers at operations centers necessary to maintain other essential functions.”

**Question (Staffing21): I am concerned by the statements from the Rhode Island Governor about “closing the borders.” If I’m to continue operating, I cannot have some of my staff waylaid on their way to work.**

Answer: Although the media reported that this was under consideration, the state of Rhode Island has not closed its borders.

**Question (Staffing22): Can the 960-hour limitation for retirees in the state retirement system, as many DPW workers are, be waived for the duration of the emergency? The theory is many of these retirees would be working fulltime, perhaps for an extended period of time.**

Answer: Governor Baker signed Chapter 53 of the Acts of 2020 into law on April 3, 2020 addressing this issue. See Section 14 of the law here:

<https://malegislature.gov/Laws/SessionLaws/Acts/2020/Chapter53>.

**Question (Staffing23): Are CORI forms required to be submitted with Temporary Emergency Certification applications?**

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Answer: Yes. The Division of Professional Licensure, which has the regulatory authority to issue the license, requires that the CORI form be attached to the Temporary Emergency Certification application. A link to the CORI form is located on the DPL website. If the TEC form is submitted without the CORI form, DPL will contact you. The board is currently meeting every week to expedite licensing.

**Question (Staffing 24): When are the testing facilities opening (exam location for licensing)?**

Answer: Operator Certification Exams prepared by the Association of Boards of Certification (ABC) and are administered by PSI Services, LLC are closed until May 1, 2020 in Massachusetts. However, This situation is fluid so we will notify you if this changes.

**Question (Staffing 25): Who should I contact if I have specific Board of Certification questions?**

Answer: The best way to contact the Board of Certification is to email [drinkingwaterboard@mass.gov](mailto:drinkingwaterboard@mass.gov).

**Question (Staffing 26): Could you describe the Board's recent streamlining for reviewing and issuing Temporary Emergency Certifications (TECs)?**

Answer: The Board voted on streamlined criteria to be applied to the review and consideration for approval of TEC applications. The TEC fee – as well as the late fee for renewal - now can be waived. The Board Chairman was authorized by the Board to review and approve TECs, as they are received, pending Criminal Offender Record Information (CORI) and Sex Offender Registry Board (SORB) review by the Division of Professional Licensure. The Chairman will report at each meeting of the Board on how many TEC applications were received, how many were approved and how many were denied. Following this streamlined Board approval, TECs will not be issued by DPL until the applicant's CORI and SORB are reviewed and determined to meet DPL criteria.

**Question (Staffing 27): Can you give an update of the Board Review of Applications for Certification?**

Answer: DPL informed the Board the division is developing procedures for review of applications remotely while protecting personal information such as Social Security numbers, telephone number and home addresses. As of the April 7, 2020 Board meeting DPL staff are not permitted to work in the office. Some staff can access the building on a grab and go basis. CORI and SORB review are also a big part of this effort.

To further build an available a pool of potential replacement operators should they be needed, it was decided by the Board, at the April 1, 2020 meeting, to work toward recalling operators who let their licenses lapse at the end of the last renewal cycle. The Board voted to allow operators whose licenses lapsed on December 31, 2019 to renew without having to meet the Training Contact Hours (TCH) requirement for licensure. Any operators who secures a renewal under this emergency

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provision will be required to bring their TCH's up to date by the end of the current renewal cycle which ends December 31, 2021.

Also, DPL informed the Board that following the April 1, 2020 Board meeting, DPL made an effort to contact the operators of approximately 500 licenses that lapsed December 31, 2019 to inform this targeted group that a webinar was being held on Friday April 10, 2020 to inform operators, of this set of lapsed licenses, of the need and opportunity to renew under and the way in which to apply to receive renewed licenses.

**Question (Staffing 28): Is there an update on the survey that MassDEP implemented to identify operators who are willing to provide services to fulfill staffing shortages at facilities?**

Answer: MassDEP received 41 responses, of which 24 are complete. This includes 21 drinking water operators and 3 wastewater operators. We have information on the types of licenses that the operators have and which DEP region they would prefer to work in. We are following up with the other 17 operators to get missing information. We will post results of the survey on MassDEP's website and can make this information directly available to public water suppliers from [michael.maynard@mass.gov](mailto:michael.maynard@mass.gov).

**Question (Staffing 29): We have two operators who need to sit for exams to be licensed – I told the person the test centers are (right now) set to open on May 1st. When will exams restart?**

Answer: The Governor extended State of Emergency until May 18<sup>th</sup>. The exam provider will follow the requirements of local and state government with respect to opening. We will inform you when the exam sites are scheduled to be open.

**Question (Staffing 30): Will the Board issue Temporary Emergency Certifications (TEC) for operators who aren't able to take the exams because the test sites are closed? Assuming the system already has licensed operators, will TEC's be granted for other employees?**

Answer: The public water system should submit the TEC with that individual's name on it, and their experience. The Board will review each individual TEC application based on its merits and make a determination. If a person cannot take the exam, and a public water system wants to put them on a TCE, the public water system should submit the TEC application to DPL at [drinkingwaterboard@mass.gov](mailto:drinkingwaterboard@mass.gov) with a cc: to [michael.maynard@mass.gov](mailto:michael.maynard@mass.gov) and [program.director-dwp@mass.gov](mailto:program.director-dwp@mass.gov). The fee for TEC applications has been waived by DPL.

**Question (Staffing 31): What is the status of the request to the DPL Board for upgrades from Operator-in-Training to full operators?**

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Answer: The Board and DPL have now established a secure location for all applications and upgrades that are received. The purpose of the secure location is so that all applications can be reviewed remotely by the Board. Currently, there are several applications that are in queue, based on the date of receipt, for review and determination.

**Question (Staffing 32): Since MassDEP will be issuing violations for adjustments in sampling plans or potentially missed samples due to closures or operator safety and health concerns related to COVID-19, will the Division of Professional Licensure be reprimanding or punishing operators for any of these violations?**

Answer: This is a question for the Division of Professional Licensure (DPL). Case specific questions for DPL Drinking Water Board should be emailed to [drinkingwaterboard@mass.gov](mailto:drinkingwaterboard@mass.gov). Board council reviewed this question and replied that all complaints will be referred to the Board for review to determine if an investigation is warranted.

**Question (Staffing 33): What types of people could be put forward to the Board as temporary operators?**

Answer: See Question (Staffing 11). Examples include engineers who may have experience running that exact treatment plant or persons with expired licenses. Each superintendent knows their system best and if they determine a candidate would appropriately operate their facility, then they should apply to the Board for that person to receive a Temporary Emergency Certificate (TEC). The public water system should complete the "Temporary Emergency Certification Application" at <https://www.mass.gov/doc/temporary-emergency-certification-application-0/download> and email it to [drinkingwaterboard@mass.gov](mailto:drinkingwaterboard@mass.gov) with a cc to: [michael.maynard@mass.gov](mailto:michael.maynard@mass.gov) and [program.director-dwp@mass.gov](mailto:program.director-dwp@mass.gov). Subject: Temporary Emergency Certification Application. Also send a hard copy to the address on the form.

**Question (Staffing 34): Will TCH requirements for license renewal be reduced because so many training conferences are cancelled?**

Answer: This question is currently under discussion by the DPL Board. However, the Board has approved and continues to approve on-line trainings for TCH credit.

**Question (Staffing 35): Is DPL still processing regular license upgrade applications?**

Answer: Yes. DPL is processing regular license upgrade applications. DPL has been transitioning to remote processing as their offices are closed.

**Question (Staffing 36): Are testing sites allowing operators to schedule exams for when they reopen? Is there a backlog at the testing sites because exams had to be rescheduled due to the closing of the sites?**

Answer: Operators may schedule exams now that the sites are open. We are unaware of any backlog but will check with examiners (ABC and PSI).

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**Question (Staffing 37): There was difficulty in getting workers in the water industry recognized for priority-status for COVID testing. Could DEP, on our behalf, begin early discussions with the Command Center to help water workers get “first responders” status for when a vaccine is made available (since supply will probably be limited)?**

Answer: This issue has been raised with the Command Center. MassDEP has been having on-going discussions with the Command Center on the essential nature of the work of water and wastewater workers and the need to provide similar services and equipment for these workers as other essential workers.

**Question (Staffing 38): Is there more information about training and test taking opportunities and options during these times? I am interested in locating online training options. Also, I am interested in any other resources or other remote options like work books.**

Answer: Trainings, including links to the Google calendars, are posted on our website at <https://www.mass.gov/info-details/drinking-water-training>.

**Question (Staffing 39): Normally, a Temporary Emergency Certification (TEC) expires after 6 months. Can this be extended through the COVID pandemic?**

Answer: All communities with expiring TEC's will be eligible for a "Provisional Certificate" for an additional 6 months. The Division of Public Licensure is checking to see if they can waive the application fee. Systems are being contacted about the extension.

**Question (Staffing 40): There still seems to be little priority for expedited testing for water/wastewater operators. Many of our staff are getting results well beyond 4-5 days. Are there priority testing sites we can send our staff? I have staff that are waiting in long lines for up to 2+ hours just to get the test as well.**

Answer: MassDEP has raised this issue with the Command Center. A list of free testing sites can be found here: [Stop the Spread | Mass.gov](https://www.mass.gov/doc/stop-the-spread-mass-gov) and a list of additional sites here: <https://www.mass.gov/doc/ma-covid-19-testing-sites/download>.

**Question (Staffing 41): As COVID vaccines are distributed, we are hoping that water and wastewater utility personnel will be included in list of essential personnel. This issue was raised before but we are still concerned.**

Answer: MassDEP raised this issue with the Command Center and will let the Command Center know that this continues to be a concern to the water utilities.

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**Question (Staffing 42): Is there any update on how vaccines will be prioritized for water utility representatives?**

Answer: According to the MA Vaccine Plan, water and wastewater utility staff are included in Phase 2 and are expected to receive the vaccine in February and March (<https://www.mass.gov/info-details/when-can-i-get-the-covid-19-vaccine#phase-2->).

**Question (Staffing 43): How will drinking water and wastewater operators be identified and then notified about being able to receive the vaccine? While first responders such as fire and police can be identified via a badge, we do not have similar identification.**

Answer: MassDEP will raise this question to the Command Center.

**Question (Staffing 44): If I work at a drinking water facility in one state but live in another, which state should I get vaccinated in? (The person asking works in MA and lives in NH but others were interested in the reverse scenario.)**

Answer: MassDEP will raise this question to the Command Center.

**Question (Staffing 45): Question: As an independent, regional water and sewer commission, we are not affiliated with a specific municipal body. We want to be sure that our organization and other independent agencies do not get lost in the shuffle. MassDEP may be a good advocate at the state level to ensure that regional systems are not overlooked when DPH prioritizes vaccinations.**

Answer: MassDEP will advocate for prioritized vaccination on behalf of all drinking water and wastewater operators, including those affiliated with regional, non-municipal systems.

**Question (Staffing 45): Would DPL grant TCHs for FEMA's NIMS Training (<https://training.fema.gov/nims/>)? This FEMA training includes IS-100, IS-200 and IS-700 and is anywhere from 2 – 6 hours for each course. FEMA grants TCHs; here is the link for each training class.**

Answer: Yes, this is eligible for TCHs. According to Section VIII (11 & 12) of the Drinking Water Board's DWB Policy 94-01 Date: November 23, 1994 Board of Certification of Operators of Drinking Water Supply Facilities Policy for Renewal Training Courses (<https://www.mass.gov/doc/policy-for-renewal-training-courses-0/download>).

(11) In order to be issued a renewal certificate, all operators must obtain TCHs in accordance with 236 CMR 4.07(4). The Board recommends that fifty percent (50%) of the amount of TCHs required for renewal be 7 directly related to the operation of Drinking Water Supply Distribution or Treatment Facilities. A list of training topics directly related to the operation of drinking water supply facilities can be found in Attachment A.

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(12) A certified operator attending training, that the Board determines is related to the operation of drinking water supply facilities, and that is provided by a Federal agency (i.e. EPA, DHS, FEMA, etc.), a Massachusetts State agency (i.e. MEMA, DPH, DCR, etc.), or any other state's drinking water certification program (eg. NH, NY, VT, or California) will be granted the amount of TCHs as awarded by the federal or state agency or state drinking water certification program. The Board will further determine if the training is directly related to the operation of Distribution or Treatment Facilities or if it is training in safety or administration of drinking water supply facilities, as described in Section VIII(11) of this policy.

**Question (Staffing 46): Is the Board of Certification considering any extension to the TCH requirements given the ongoing State of Emergency?**

**Answer:** Neither the DW Board nor the WW Board will be offering an extension at this time. There are a number of online training classes offering TCHs. Both Boards will continue to monitor the situation. You may also want to go the Board of Certification of Operators of Drinking Water Supply Facilities Operators training page and view the approved education courses to sit for examination. Go to: <https://www.mass.gov/doc/drinking-water-board-approved-education-courses-updated-september2020/download>.

## Safety and Planning

**Question (Safety/Planning1): There is no response from regional state drinking water staff.**

Answer: Call the MassDEP 24-hour emergency line 888-304-1133.

**Question (Safety/Planning2): The Centers for Disease Control and Prevention (CDC) states, "Conventional water treatment methods that use filtration and disinfection, such as those in most municipal drinking water systems, should remove or inactivate the virus that causes COVID-19 (<https://www.cdc.gov/coronavirus/2019-ncov/php/water.html>)."** However, there are public water systems in Massachusetts that do not disinfect or filter their water. Is this water safe to drink or touch?

Answer: If the water is tested and meets drinking water standards, people can drink water from their tap as usual. There have been no known detections of coronavirus in water supplies (<https://www.cdc.gov/coronavirus/2019-ncov/php/water.html>). According to the World Health Organization (WHO), "the presence of the COVID-19 virus has not been detected in drinking-water supplies and based on current evidence the risk to water supplies is low."

The U.S. Environmental Protection Agency (EPA) has established a website with its most up-to-date information on COVID-19 and drinking water, which can be found here:

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

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**Question (Safety/Planning3): Is there COVID-19 guidance for owners of private wells?**

Answer: Homeowners with private wells who are concerned about pathogens such as viruses in drinking water may consider approaches that remove bacteria, viruses, and other pathogens, including certified home treatment devices (<https://www.epa.gov/coronavirus/coronavirus-and-drinking-water-and-wastewater>).

**Question (Safety/Planning4): Does MEMA arrange for personal protective equipment this type of emergency?**

Answer: There is a shortage of PPE at this time. MassDEP has raised this issue based on your comments at the state level. Facilities should also be in contact with your local emergency management officials to identify PPE needs. DEP will send any updated information it receives.

**Question (Safety/Planning5): Can COVID-19 be detected in a bacteria test?**

Answer: We are not aware of any direct test for SARS-CoV-2/coronavirus in drinking water.

**Question (Safety/Planning6): Any additional guidance for best practices?**

Answer: The Occupational Safety and Health Administration (OSHA) developed this COVID-19 planning guidance based on traditional infection prevention and industrial hygiene practices. It focuses on the need for employers to implement engineering, administrative, and work practice controls and personal protective equipment (PPE), as well as considerations for doing so.

This guidance is intended for planning purposes. Employers and workers should use this planning guidance to help identify risk levels in workplace settings and to determine any appropriate control measures to implement. Additional guidance may be needed as COVID-19 outbreak conditions change, including as new information about the virus, its transmission, and impacts, becomes available.

OSHA 3990-03 2020: Guidance on Preparing Workplaces for COVID-19:

<https://www.osha.gov/Publications/OSHA3990.pdf>

**Question (Safety/Planning7): Should we plan for longer than April?**

Answer: We will all be monitoring health information and directives as we move forward through this emergency. We encourage and appreciate the work public water systems are doing to plan for a variety of scenarios, including extension of the current emergency period, in their drinking water Emergency Response Plans.

**Question (Safety/Planning8): Water and wastewater professionals should be eligible for priority COVID-19 testing.**

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Answer: MassDEP has raised this issue to the Command Center.

**Question (Safety/Planning9): There are public water systems that are municipally owned, and then there are public water systems that are privately owned. There are several large private water companies in the state. With a possible issuance of PPE by the federal government, we are hoping that both municipal public water systems and private public water systems will be eligible to receive supplies. Any clarification?**

Answer: All utilities are eligible - both publicly and privately owned.

**Question (Safety/Planning10): We need gloves, in addition to masks.**

Answer: MassDEP will be posting a PPE and Supplies Needs Survey for all Public Water Systems (PWS) and Wastewater Utilities on its website to better articulate the needs of operators. Also, MassDEP continues to coordinate on this issue with the MEMA Command Center and the federal government.

Answer Update 12/1/20:

In the summer, MassDEP delivered 60,000 cloth masks to water suppliers and wastewater operators. Thanks to the generosity of the state of New Hampshire, a third round of cloth mask distribution is being offered again to continue supporting safe operations. MassDEP is currently distributing an additional 20,000 cloth masks from New Hampshire.

**Question (Safety/Planning11): Is there guidance from the state on PPE?**

Answer: The Commonwealth has listed Guidance for requesting, distributing, prioritizing, and optimizing use of Personal Protective Equipment (PPE) in Massachusetts during the COVID-19 response. See: <https://www.mass.gov/info-details/personal-protective-equipment-ppe-during-covid-19>.

**Question (Safety/Planning12): Can DW/WW systems get notifications from public health authorities on whether or not somebody has COVID-19 in the buildings needed to access for sampling or servicing?**

Answer: Health information is shared with health safety and first responders but is not able to be shared more broadly than that.

**Question (Safety/Planning13): Are there any shared methods from other DPWs about how they are addressing the cleaning/disinfection of equipment/tools used during responses to water main breaks or sewer plugs (i.e. on-site disinfection, disinfection between each use at job sites, disinfection of all items upon return to the barn/garage) where multiple staff members may be in contact with items?**

Answer: PWS should follow the CDC COVID -19 safety measures, including social distancing, and standard equipment disinfection procedures. For contact information on other public

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water suppliers see <https://www.mass.gov/doc/public-water-suppliers-contact-spreadsheet-rev-aug-2020/download>.

**Question (Safety14): The state submitted its proposed COVID-19 Vaccination Plan to the CDC and the priority is:**

- Healthcare personnel (HCP) likely to be exposed to or treat people, with COVID-19
- People at increased risk for severe illness from COVID-19, including those with underlying medical conditions and people 65 years of age and older
- Other essential workers

**The “other essential workers” category is broad. Please comment on any more recent conversations that you have had with the Command Center about priority access for water/wastewater operators.**

Answer: MassDEP raised this issue with the Command Center.

**Question (Safety15): Essential workers who travel for leisure are not exempt from travel restrictions; they must quarantine or produce a negative result from a COVID-19 test to return to work. Would MassDEP please contact the Command Center to have this policy reconsidered or can the state provide rapid testing for essential workers coming back into the state after leisure travel?**

Answer: MassDEP raised this issue with the Command Center.

**Question (Safety16): MassDEP has been made aware of a cyber attack on a utility. MassDEP wants to make facilities aware of this and provide these recommended actions for other utilities to take immediately:**

Answer: WaterISAC continues reminding members to plan/prepare for the worst and hope for the best. When it comes to ransomware, regularly:

- Revisit, review, and discuss ransomware and data breach playbooks/policies/procedures, and keep them up-to-date. The CISA/MS-ISAC Ransomware Guide is a valuable resource to be used for prevention and response best practice guidance.
- Keep a reputable incident response firm on retainer before an incident occurs.
- Evaluate cyber insurance policies to confirm proper coverage.
- Send out security awareness reminders to all staff on how phishing is a very common initial infection vector for ransomware.
- Remind staff not to open attachments or click on links contained in emails, even if the email looks like it is from a trustworthy source. And if they already have received and/or actioned a suspicious email, encourage them to report the event now.

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- Check device and network logs and events for potential intrusions, and consider configuring alerts for changes to files.
- Test backups and restore procedures before you need them and make sure you have a valid tested copy stored offline.
- Report ransomware incidents to authorities (and WaterISAC).

Additional resources on Egregor ransomware:

- <https://threatpost.com/egregor-ransomware-mass-media-corporate-data/159816/>  
<https://www.darkreading.com/vulnerabilities---threats/meet-egregor-a-new-ransomware-family-to-watch/d/d-id/1339091>
- Cybersecurity incidents should be reported to the DHS Cybersecurity and Infrastructure Security Agency at: <https://us-cert.cisa.gov/report>

For questions and to report incidents, email [analyst@waterisac.org](mailto:analyst@waterisac.org).

**Question (Safety/Planning17): As an independent, regional water and sewer commission, we are not affiliated with a specific municipal body. We want to be sure that our organization and other independent agencies do not get lost in the shuffle. MassDEP may be a good advocate at the state level to ensure that regional systems are not overlooked when DPH prioritizes vaccinations.**

Answer: MassDEP will advocate for prioritized vaccination on behalf of all drinking water and wastewater operators, including those affiliated with regional, non-municipal systems.

**Question (Safety18): Is there news about vaccine distribution schedule, logistics, or eligibility?**

Answer: Water and wastewater utility staff are among the essential employees included in Phase 2 of the vaccine rollout, which began Feb. 1<sup>st</sup> with people 75 and older as first priority recipients. Phase 2 is scheduled to take place in February and March. <https://www.mass.gov/info-details/massachusetts-covid-19-vaccination-phases#phase-2->. Water Utilities are on DPH's radar. MassDEP has made contact with DPH and has consistently been advocating on your behalf. MWWA, MWRA and others have also made DPH aware of the urgency and importance of vaccination for the industry given the essential service you all provide. MassDEP stands ready to help in any way to support vaccination of water utility employees. We expect to learn more from DPH and we will share that with you, as soon as we learn anything.

**Question (Safety19): How will a private wastewater operator group receive vaccines if it does not have access to a municipality for distribution?**

Answer: MassDEP does not have information on vaccine distribution but expects to learn more from DPH and will share that with the drinking water and wastewater utilities as soon as possible.

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**Question (Safety20): Will wastewater support staff who do not have licenses will be eligible under Phase 2?**

Answer: MassDEP does not have information on vaccine distribution but expects to learn more from DPH and will share that with the drinking water and wastewater utilities as soon as possible.

## **Building Guidance**

**Question (Building1): CDC has distributed guidance on how to get buildings back up and going after the pandemic, but what about facilities like schools that do currently have a couple of staff working, but don't nearly have the usage that they would otherwise, what is the guidance for those facilities where there may be people drinking the water while the facility is closed, should they be doing any sort of flushing internally?**

Answer: MassDEP has provided information on Building Flushing Information for Public Water Suppliers for use after buildings have been shut down or used less frequently. See <https://www.mass.gov/doc/massdep-building-flushing-information/download>. For information for schools on mitigating lead and copper levels after school closure see Question (Inspections/Repairs5) at <https://www.mass.gov/doc/lead-and-copper-best-practices/download>. In addition, Revised Total Coliform Rule (RTCR) "start-up" procedures for systems have been provided in the MassDEP Frequently Asked Questions at <https://www.mass.gov/doc/massdep-covid-19-faqs-for-public-water-suppliers-0/download>.

**Question (Building2): Should there be concerns about stagnant water in buildings where the water has not been running? What about schools, large employers, etc.?**

Answer: Stagnant water conditions can result in discolored water, lower chlorine levels, higher concentrations of lead and copper and even the proliferation of legionella, under certain building conditions. Fresh water should be drawn into the building water systems and stagnant water flushed out before the buildings are re-opened or if the facility was using a reduced flow, prior to returning to typical water use. The Drinking Water Program has provided guidance on how to re-open the water system in building /facilities that have been closed or had no or low flow.

**Question (Building3): Does Massachusetts have guidance on building flushing?**

Answer: The guidance is posted at <https://www.mass.gov/doc/massdep-building-flushing-information>. It includes a link to EPA's guidance. Owners/operators for building or facilities that have been closed or have little to no flow must flush out stagnant water and follow all other requirements before re-opening or returning to typical water use. At a minimum, flushing should be unidirectional, starting with fully opening the tap closest to the entry point of the building's distribution system and

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moving through the building to the most distant tap. For systems with a disinfection residual, make sure that the residual in the building is the same as the residual in the water main. All equipment that use water should also be flushed out according to manufactures' specifications. For important and necessary details on flushing review the above noted guidance.

**Question (Building4): Q: Will the state be pushing out the flushing guidance to property owners and managers directly?**

Answer: Yes. MassDEP has sent out its guidance through a variety of organizations. The organization will include MFAA- Massachusetts Facility Administrators' Association, NAIOP - Massachusetts Commercial Real Estate Development Association, Greater Boston Real Estate Board, etc.

**Question (Building5): The CDC has put out guidance for building owners on reopening their facilities; will Massachusetts be putting out any additional state-specific guidance?**

Answer: MassDEP's guidance is available at <https://www.mass.gov/doc/massdep-building-flushing-information/download>. The MassDEP Guidance incorporates CDC Guidance.

**Question (Building6): Can DEP request the Governor incorporate information about the re-opening flushing guidance is in a press conference?**

Answer: MassDEP initiated this request.

**Question (Building7): Question: Will the flushing/reopening building guidance be included in the governor's updates?**

Answer: MassDEP raised this question to the Command Center.

**Question (Building8): Can DEP have flushing information for low/no flow businesses statewide broadcast via TV, radio to get message out to public to assist PWS in efforts, since duration of COVID-19 is much longer than anticipated?**

Answer: MassDEP has provided notice in many formats including social media. MassDEP has submitted this question to the Command Center.

## **Laboratory Services**

**Question (Lab1): I have had questions from multiple utilities on how or whether the labs will operate with the quarantine? Will you or do you have special conditions for sample drop off?**

Answer: At this time the labs that have shared their status with MassDEP have indicated that they remain open for business but may have instituted new procedures for sample delivery and drop off.

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PWSs should contact their lab regularly and confirm whether they need to modify any of their routine practices. Labs can contact MassDEP's Wall Experiment Station for guidance on sample drop-off.

**Question (Lab2): Laboratories seem to be concerned about being open and having adequate staffing. How will DEP deal with this if our hired labs are closed?**

Answer: Staff in laboratories conducting analyses for water and wastewater systems are considered "essential." If a public water supplier is concerned that its lab might closed because of a shortage of staff, it should identify alternative labs now that could perform the required analyses.

## **Chemicals and Other Supplies**

**Question (Supplies1): What if there is a shortage of necessary chemicals? For example, there is a 10-day backlog for sodium hydroxide. Can MassDEP issue a temporary inactivation of certain treatment for water or wastewater systems if chemicals are not available?**

Answer: The drinking water regulations at 310 CMR 22.03(13) include "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.

**MassDEP wants to know what chemicals are most in short supply.** If you are concerned that your system is or may be running out of chemicals in the near future, please notify MassDEP at once. MassDEP will work with federal and state authorities to see if we can help address such a shortage. But timely notification is essential to avoid disruption.

**Question (Supplies2): What if a public water system cannot purchase sodium fluoride, which is only available from China? Can MassDEP issue waivers to public water systems that cannot obtain sodium fluoride?**

Answer: The drinking water regulations at 310 CMR 22.03(13) include "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." If a public water system is unable to obtain fluoride for its system, it must contact the Department of Public Health (Fluoridation Coordinator is Heather Benabbou at [Heather.Benabbou@state.ma.us](mailto:Heather.Benabbou@state.ma.us)) and provide 1) the water supplier's name and contact information;

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2) affected areas; 3) the anticipated date it will run out of fluoride; 4) the anticipated duration without fluoride; and 5) the fluoride supplier name. When this is done, the water system should then notify the MassDEP regional office that it has done so.

**Question (Supplies3): Some water systems are ordering way more chemicals than they would normally need, and other suppliers are concerned about this. Water systems should be planning chemical usage and not “hoarding.”**

Answer: MassDEP strongly discourages hoarding of supplies as this could result in a shortage of supplies impacting the operations of many systems. We encourage you to coordinate with neighboring facilities if you do have ample supplies.

**Question (Supplies4): Can we get Clorox wipes and hand sanitizer for employees working on maintenance from a state supply?**

Answer: We will share information on this issue when it becomes available.

**Question (Supplies5): Has the state heard anything about supply chain issues with liquid oxygen supplies with prioritization for healthcare facilities? Ozone disinfection facilities can be affected.**

Answer: Some wastewater systems have been notified by providers that they will need start to think about managing demand based on the increase demand of oxygen as a result of COVID-19. MassDEP is following up on this topic but currently we are not aware of any system at risk of running out of supplies right now. Systems are urged to notify MassDEP if they are at risk of running out of oxygen or any other needed chemical.

**Question(Supplies6): Where is the map of systems using CO<sub>2</sub>? (EPA provided information on food-grade CO<sub>2</sub> suppliers and producers if water utilities need to identify alternative companies, pursuant to Section 1442(a)(2) of the Safe Drinking Water Act.**

Answer: To view the resources that EPA has compiled please visit: <https://www.epa.gov/ground-water-and-drinking-water/food-grade-co2-suppliers-and-producers>).

**Question (Supplies7): With the uptick in COVID cases, is MassDEP or EPA hearing any concerns from water systems about potential impacts to chemical delivery or the supply chain in general?**

Answer: EPA has heard that there is an issue with CO<sub>2</sub> in Florida, but has not heard of this issue in Massachusetts.

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MassDEP heard from a commercial laboratory that there is a delay or backorder in flip-top sterile bottles for bacteria testing and petri dishes from suppliers, possibly because of the nationwide demand for sterilization equipment. MassDEP checked with the MA Water Resources Authority on this issue. MWRA reported that it uses screw top bottles but did notice a delay in availability of flip-top bottles. It also noted that heterotrophic plate count (HPC) plates were delayed by one week and sterile pipettes tips were delayed by one month. One larger facility reported to MWWA that its vendors are restricting its ordering of PPE to the quantities it had ordered in the past. This facility is interested in exploring the possibility of a consortium to purchase PPE, similar to the consortium that purchases chemicals.

It is imperative that facilities that experience supply chain issues report this to both MassDEP and EPA.

**Question (Supplies8): Does the state have contingency plans in the case of chemical shortages? Will the drinking water and wastewater industries receive priority when there are shortages? (There is currently nationwide concern that there is a shortage of pool chemicals [chlorine tablets] but it does not appear that chlorine gas is affected.)**

Answer: Drinking water and wastewater systems are strongly urged to raise any supply chain issues to both MassDEP and EPA. Together, we can coordinate with MEMA, MAWARN and other federal agencies to provide assistance.

## Service

**Question (Service1): Last Tuesday on the DEP conference call someone alluded to the fact that we cannot legally deny someone water service because we are not going into homes during the pandemic. We have a property that has been vacant for some time, and now has a resident moving in. The water meter was removed by our staff several years ago and stored at our water shop. To activate their service, we would need to enter the home, which we have been avoiding except for emergency calls during the pandemic. Can anyone verify if it is true that we must go turn on the water to this property?**

Answer: MassDEP regulations do not require public water suppliers to connect a previously vacant home. More broadly, MassDEP regulations do not contain requirements regarding when a public water supplier must provide water to a home. MassDEP recommends that municipal public water suppliers consult their city or town counsel as to whether there are any local ordinances, bylaws or other rules that address this issue under local authority. Public water suppliers that are regulated by the Department of Public Utilities should also consult DPU regulations, tariffs and any orders or directives to determine if there are DPU rules that apply.

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**Question (Service2): Can customers' water be shutoff for a few hours right now to allow water main work to proceed or has the government prohibited that?**

Answer: Water is an essential service. Temporarily shutting off service to some customers to perform maintenance or add new service connections is a typical procedure for which there are normal protocols that include notification to impacted customers and for timing the temporary service interruption to minimize customer impact. Public water systems implementing their normal protocol for temporary maintenance service shutoffs should be cognizant of how the COVID-19 stay-at-home advisory might change consumers daily water use and system demand patterns. Contact your regional DEP program for assistance.

**Question (Service 3): Could DEP comment on whether water shut offs for non-payment are allowed for customers of private water systems? (We recognize there is a law not allowing shut offs for municipal or district PWS until June 30th and a directive for Investor-owned utilities regulated by DPU to not terminate service until the end of the State of Emergency or DPU lifts the order. This PWS is not municipal and is not regulated by DPU).**

Answer: MassDEP does not have any jurisdiction over this issue and recommends that private water systems consult with their attorney.

## **Funding**

**Question (Funding1): Are there funds available for COVID-19 expenses?**

Answer: In the event funds are made available through FEMA or other sources, it will be helpful to track expenditures. Sheets to track expenses provided by MEMA are located here: <https://www.mass.gov/info-details/fema-3438-em-ma-covid-19-emergency-declaration> MEMA has sent out the information through its list service. DPH linked to the MEMA announcement and sent it to their list services, which included municipal partners. .

**Question (Funding2): Can you please provide an update on plan for finalizing the Clean Water Intended Use Plans that will be financed through the Clean Water SRF loan Program. Particularly regarding the Asset Management Planning Grants, do you anticipate any effects on the timeline or procedural changes for the June 30th Appropriation of Local Funds, October 16th Financing Application deadline, or any other program changes?**

Answer: The comment period on the Intended Use Plan closed on March 16, 2020 and MassDEP is working to finalize the IUP. MassDEP and the Clean Water Trust have issued the following statement:

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## COVID-19 Guidance for State Revolving Fund Borrowers

Due to protocols put in place by the State of Massachusetts in response to the COVID-19 emergency, MassDEP and the Clean Water Trust are working remotely during this time. Both agencies are fully functional and the day to day operations continue to assist borrowers in funding their projects.

We have heard from many communities concerned about their ability to hold town meetings or sign contracts due to availability of construction materials and the uncertainty of the impact the COVID-19 emergency will have on project costs.

### **Additional Subsidy for 2019 IUP**

In response, MassDEP and the Massachusetts Clean Water Trust (the Trust) have extended the deadline to qualify for additional subsidy for eligible borrowers in the 2019 Intended Use Plan for both the Clean Water and the Drinking Water State Revolving Fund (SRF) programs. **Additional subsidy will be disbursed over construction contracts that are executed by August 14, 2020.** This 45-day extension will be reassessed and may be further extended if so required. MassDEP and the Trust remain committed to work with borrowers during these challenging times to ensure SRF financed projects are implemented in order to protect public health and the environment.

### **Local Authorization for 2020 Intended Use Plan (IUP)**

The final IUPs, when published, will state that to be considered for funding priority, **communities must have appropriated the necessary local project funds or have committed to a schedule to obtain those funds by October 16, 2020.** This deadline will allow for communities to plan for a town meeting in the fall in time to submit the complete SRF loan application.

For questions please contact:

Maria Pinaud, Division Director for Municipal Services at MassDEP  
[Maria.Pinaud@mass.gov](mailto:Maria.Pinaud@mass.gov)

Nathaniel Keenan, Deputy Director, Massachusetts Clean Water Trust  
[nkeenan@tre.state.ma.us](mailto:nkeenan@tre.state.ma.us)

**Question (Funding3): Section 10, Chapter 53 of Acts of 2020 prohibits the shutoff of water service until June 30, 2020. However, Section 11 discusses interest charges but states “may” waive the payment of interest. Must the interest be waived or may it be waived?**

Answer: Section 11 states (with emphasis added):

“[T]he Chief Executive Officer of a city or town . . . or the prudential committee or commissioners of a district may waive the payment of interest and other penalty in the event of late payment of any excise, tax, betterment assessment or apportionment thereof, water rate or annual sewer use or other charge added to a tax for any payments with a due date on or after March 10, 2020 and made

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after its respective due date but before June 30, 2020, if the nonpayment resulted from a demonstrated inability to pay due to circumstances related to the outbreak of COVID-19 or the governor's March 10, 2020 declaration of a state of emergency; provided that the inability to pay shall include a demonstrated financial hardship of a resident, which may include, but not be limited to, loss of employment, serious illness of someone within the home or death of someone within the home."

Our General Counsel's Office notes (as the question itself did) that the language of Section 11 uses the phrase "may waive" for any late payments on bills that were due "on or after March 10<sup>th</sup>", with the conditions: (1) a resident must demonstrate an "inability to pay" due to COVID-19; and (2) the provision applies to payments received before June 30, 2020.

Answer update (10-5-2020): The prohibition against shutting off water terminated on June 30, 2020.

**Question (Funding4): We have given a directive by the Town Administrator that we are to cease expenditures without his approval on anything other than payroll, utilities and contractual obligations. I am not sure this is going to ensure a reliable, sustainable, nor safe water system. Can this be addressed to the Commissioner since DEP has primacy on this? Departments on the enterprise system are set up to be self-sustaining in times like this and we are going to need to perform things that will entail costs.**

Answer: If a public water system is confronting an issue that affects its obligations under federal and state drinking water laws and regulations, the first step will be to reach out to its MassDEP Regional Office so we can get a better understanding of what the issues are. We would need to know if there is a particular function that the PWS is not able to perform.

**Question (Funding5): Is there any news or updates on how FEMA/MEMA may be handling reimbursement of costs (if allowed) for water/wastewater systems?**

Answer: MassDEP will work with the MEMA Command Center to get the latest information. Here is a link to FEMA's COVID-19 reimbursement webpage: <https://www.fema.gov/news-release/2020/03/23/coronavirus-covid-19-pandemic-public-assistance-simplified-application>.

**Question (Funding6): Will there be a stimulus? What projects will be allowed? How will we apply for them?**

Answer: MassDEP understands that this emergency will affect systems' revenues over the long-term. MassDEP has heard that national water advocacy groups have been working with Congress to address these issues but does not have direct knowledge of this work. We are researching opportunities for input for sectors to be addressed in the next stimulus package.

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**Question (Funding7): One of the speakers during yesterday’s DR-4496 COVID-19 Pandemic Application briefing mentioned that the 2 hours attending the briefing was a reimbursable expense. It follows that the attendance and participation in the weekly MassDEP COVID-19 briefings would be FEMA reimbursable expenses for water and wastewater personnel. Should water and wastewater personnel keep a record of their attendance at these briefings and submit their time, along with other COVID-19 expenses, to FEMA through their municipality or district?**

Answer: MassDEP recommends that water and wastewater personnel keep track of all COVID-19 related expenses. However, FEMA makes the final decisions on what is reimbursable.

**Question (Funding8): Can there be direction on how to fill out the MEMA needs spreadsheets that support reimbursement under the FEMA COVID-19 Federal Disaster Declaration?**

Answer: There is a lot of information on the COVID-19 Federal Disaster Declaration here: <https://www.mass.gov/info-details/covid-19-federal-disaster-declaration>, including a “Questions” section which is portal to submit questions to MEMA. MEMA checks this site and ensures all questions are answered. Please follow this link to go directly to the question form: [https://massgov.formstack.com/forms/em3438\\_declaration\\_fema\\_pa\\_questions](https://massgov.formstack.com/forms/em3438_declaration_fema_pa_questions). Also, MEMA recently held applicant briefings to provide guidance on filling out the reimbursement forms. MEMA will post the recordings, slides, and Q&As shortly.

**Question (Funding9): One of the FAQs was about water shutoffs for nonpayment and referenced Section 11 from Acts of 2020. There was also a referenced date of June 30th of receiving payments in these situations. Does this still apply regardless of the June 30th date due to the continued state of emergency? And for clarification, the prohibition of water shutoffs is still applicable due to the continued state of emergency, correct?**

Answer: The prohibition terminated on June 30<sup>th</sup>, as there has been no legislation passed that would extend the prohibition.

**Question (Funding10): My water district has pumped more water than it ever has due to our residents being quarantined. Our wells are stressed and will keep up with the summer demand. We instituted a water ban but are still faced with purchasing from a neighboring community at a high rate. Could we be reimbursed for this?**

Answer: Jennifer Pederson, Executive Director of the Massachusetts Water Works Association, has advised PWS to contact MEMA to determine if this cost could be reimbursed.

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**Question (Funding11): If there are any utility payment relief programs planned at the MA State level, we request that water and wastewater utilities be included in those programs.**

Answer: MassDEP has notified the Command Center of the drinking water and wastewater utilities' concerns about revenues shortfalls. We will continue to stay in touch with the Command Center and the utilities on this issue.

**Question (Funding 12): Are state funds available yet to conduct testing of essential employees?**

Answer: MassDEP is not aware of a state program for this purpose.

**Question (Funding 13): The most recent federal COVID relief bill included \$638 Million in assistance for low-income water and wastewater rate payers. This relief is critically important to our utility as our retail customers have the second lowest median household income in the state and our receivables sit at close to \$10 Million, triple what they typically are. Many other urban, socially/economically challenged communities are facing similar issues. How will this relief money will be accessed and distributed?**

Answer: Congress passed two pieces of legislation, the Covid Relief Act and the Consolidated Appropriations Act to provide relief to water and wastewater rate payers. The Covid Relief Act includes money for renters who are having trouble paying their utility bills. Included in the Consolidated Appropriations Act that the House and Senate approved on December 12, 2020 is \$638 million to forgive overdue water and sewer bills of intended to help low-income households. According to the legislation, the Department of Health and Human Services (HHS) will send money to states and tribes, which will, in turn, distribute the funds to utilities. Utilities have the option of reducing customer arrears or reducing water rates for eligible customers.

Funding will be awarded to states and tribes based on two criteria: the percent of households with income less than 150 percent of the federal poverty line and the number of households paying more than 30 percent of income on housing. Utilities are supposed to use existing processes, programs, and procedures to identify people in need of funding. We will alert the drinking water and wastewater industries when we receive this information.

The actual language is:

*SEC. 533. For an additional amount for "Department of Health and Human Services—Administration for Children and Families—Children and Families Services Programs", \$638,000,000, to prevent, prepare for, and respond to coronavirus, for necessary expenses for grants to carry out a Low-Income Household Drinking Water and Wastewater Emergency Assistance Program: Provided, That the Secretary of Health and Human Services shall make grants to States and Indian Tribes to assist low-income households, particularly those with the lowest incomes, that pay a high proportion of household income for drinking water and*

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*wastewater services, by providing funds to owners or operators of public water systems or treatment works to reduce arrearages of and rates charged to such households for such services: Provided further, That in carrying out this appropriation, the Secretary, States, and Indian Tribes, as applicable, shall, as appropriate and to the extent practicable, use existing processes, procedures, policies, and systems in place to provide assistance to low-income households, including by using existing programs and program announcements, application and approval processes: Provided further, That the Secretary shall allot amounts appropriated in this section to a State or Indian Tribe based on the following (i) the percentage of households in the State, or under the jurisdiction of the Indian Tribe, with income equal to or less than 150 percent of the Federal poverty line, and (ii) the percentage of such households in the State, or under the jurisdiction of the Indian Tribe, that spend more than 30 percent of monthly income on housing: Provided further, That up to 3 percent of the amount appropriated in this section shall be reserved for Indian Tribes and tribal organizations: Provided further, That such amount is designated by the Congress as being for an emergency requirement pursuant to section 251(b)(2)(A)(i) of the Balanced Budget and Emergency Deficit Control Act of 1985. This division may be cited as the “Departments of Labor, Health and Human Services, and Education, and Related Agencies Appropriations Act, 2021”.*

## **Additional Information**

### **Question (AdditionalInfo1): What actions should water and wastewater system operators take to address the Coronavirus?**

Answer: 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** – Massachusetts Water/Wastewater Agency Response Network download the application at [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>

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**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 and other critical vendors** 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!

**Curtail interactions; practice "social distancing."**

**Question (Additional Info2): MassDEP is holding regularly scheduled calls with public water supplies, will there be a similar phone call to discuss wastewater operation questions?**

Answer: MassDEP is hosting similar calls with the wastewater industry.

**Question (Additional Info3): Where can we get the latest information from EPA and MassDEP on COVID-19?**

Answer: Check for the latest information from EPA here:

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

Check for the latest information from MassDEP here: <https://www.mass.gov/info-details/masdep-covid-19-resources-for-water-suppliers-and-wastewater-operators>

**Question (Additional Info4): Where can I get FEMA forms and other useful information?**

Answer: EPA's Water Utility Response On-The-Go Mobile Application has a lot of useful information for water utility operators, including FEMA forms: <https://www.epa.gov/waterutilityresponse/water-utility-response-go-mobile-application>.

**Question (Additional Info5): What materials have MassDEP developed for water suppliers in response to COVID?**

Answer: List of developed tools on-line at <https://www.mass.gov/info-details/masdep-covid-19-resources-for-water-suppliers-and-wastewater-operators#water-supplier-resources->

- Addressing stagnant water in buildings (for building owners and managers)

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- Start-up Activities Checklist for Non-Community and small water systems that have closed due to a State of Emergency - Recommended checklist (New)
- Form for documenting non-compliance due to covid-19 (New)
- Hydrant monitoring
- Spigot monitoring
- Emergency Certification Form for Non-community PWS temporary closure due to covid-19
- For schools- mitigating lead and copper levels after school closures
- Results of operator sharing survey.
- FAQs
- Information on Flushing after closure or low flow
- Survey on number of employees for PPE (cloth masks)

In development:

- Expanded survey on PPE/Chemical use
- Information for PWS on protective measures
- Preparation for sanitary surveys - In-house survey of experiences we have had conducting remote surveys to assist in developing remote survey/inspection and site visit tools

**Question (Additional Info6): When will MassDEP's Regional Offices will be open?**

Answer: We do not have a date yet; we are still following social distancing protocols. Please contact MassDEP if you have specific needs.

**Question (Additional Info7): Will there be sector-specific reopening guidance for DW/WW facilities? Will representatives of DW/WW facilities have the opportunity to engage with the reopening advisory board?**

Answer: MassDEP has submitted this question to the Command Center.

**Question (Additional Info8): What is Massachusetts Water Works Association doing on to assist PWS to collect data on COVID-19 financial impacts?**

Answer: MWWA will provide a synopsis of its revenue work group guide to help utilities think about the kind of data that is important to track for documenting the impact that COVID-19 is having on PWS and help the systems be best prepared if financial assistance opportunities become available.

Additional information:

- AWWA/AMWA/Raftelis April 2020 report, you can view it here: <https://www.raftelis.com/insight/covid-19-water-utility-consumption/>.

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- RCAP results of a May 2020 survey on the impact of COVID-19 on Rural Water Systems, you can view that [here](#).
- Raftelis and Duke University preliminary findings on impacts to consumption and revenues with utilities across the nation, you can view the preliminary findings [here](#).

**Question (Additional Info9): What is the status of Bill H.4631? This would be interesting to all the water and wastewater personnel that have worked through this pandemic with no extra pay.**

Answer: This bill is with the Committee on Public Service, but has not moved since it was filed. Also, that language was not included in the recently-signed COVID spending bill or proposed as an amendment by Rep. Chan (sponsor of H.4631) to the current economic bill.

**Question (Additional Info10): What is the best way to communicate with staff while DEP maintains a virtual workplace?**

Answer: You can reach DEP staff through their emails. They also check the voicemails of their office phones regularly. Contact information for key MassDEP staff is presented on pages 2-3 of this document.

**Question (Additional Info11): Is there any intent to move from monthly to bi-weekly calls due to the re-insurgence of COVID?**

Answer: At this point, there are not as many questions from the PWSs, however, MassDEP is available to provide guidance at any time and to go back to bi-weekly when needed.

**Question (Additional Info12): What are the deadlines for America's Water Infrastructure Act (AWIA) emergency response plan?**

Answer:

- PWS serving 50,000 to 99,999: certification of your updated Emergency Response Plan (ERP) is due to EPA by June 30, 2021 or no later than six months after certification of your AWIA-required Risk and Resilience Assessment (RRA).
- PWSs serving 3,301 to 49,999 should also be developing their RRA to submit certification of its completion to EPA by June 30, 2021. Remember, certification to EPA of your updated ERP is then required by December 31, 2021.
- For information on how to certify completion of their RRA and/or ERP to EPA see: <https://www.epa.gov/waterresilience/how-certify-your-risk-and-resilience-assessment-or-emergency-response-plan>

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## Helpful Resources for the Water and Wastewater Industries:

MassDEP Forms for a Drinking Water Temporary Emergency Certification of Provisional Certification

- <https://www.mass.gov/lists/operators-of-drinking-water-supply-facilities-applications-and-forms>.

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>

## Additional Information

Below are additional links to helpful resources:

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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>

## Training

### EPA’s Lead and Copper Rule Revisions Virtual Engagements

A public listening session will be held on **May 5, 2021, from 10 a.m. to 10 p.m.** Those interested in speaking can sign up for a 3-minute time slot by [submitting a speaker registration form](#). If you are not planning on speaking but are interested in listening, you do not need to register. For more information see: <https://www.epa.gov/ground-water-and-drinking-water/lead-and-copper-rule-revisions-virtual-engagements>. To see the recorded sessions of April 28 or May 5, 2021, go to: <https://www.youtube.com/channel/UC0VBG2o4x4XIfp8XiIDA1wQ/live>