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Executive Office of Energy & Environmental Affairs

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MassDEP COVID-19 FAQs for Wastewater Service Providers

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Answers to questions that have been raised by wastewater operators. This list of questions and answers will be regularly updated. This document's latest questions and answers are highlighted in yellow.

Permit

Question (Permit1): 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. The guidance, which addresses routine monitoring and reporting requirements, applies to the NPDES program, which is administered jointly by EPA and MassDEP. In guidance specifically regarding the NPDES program, EPA states, "EPA will be looking for individuals/facilities to make every effort to comply with their NPDES permits but if, for reasons related to COVID-19, you are not able to sample or analyze samples required by permit, please submit your discharge monitoring reports through NetDMR using the No Data Indicator or NODI code of "3" - "Special Report Attached". When using the NODI code 3, a facility must provide an explanation in either the comment section of the DMR or in a separate attachment to the DMR. The Explanation should identifies (sic) the specific reasons for the sampling/reporting delay. NODI code 3 will not appear as a violation in the public-facing Enforcement and Compliance History Online (ECHO)."

If you have concerns about a Groundwater Discharge Permit, please contact your MassDEP regional office.

Safety

Question (Safety1): If there is no response from regional staff, should I call the state emergency line?

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

Question (Safety2): Does MEMA arrange for personal protective equipment for this type of emergency?

Answer: MassDEP is not aware of a program currently operating to provide PPE for water systems but has raised this with authorities. Work with your regional management authorities where possible to make requests to MEMA: <https://www.mass.gov/doc/ma-covid-19-ppe-request-process-chart/download>.

Question (Safety3): We know MassDEP is strongly encouraging the continuation of discharge monitoring. When should an operator not enter a facility to monitor or inspect? What are best practices that the wastewater service providers should follow?

Answer: Careful implementation of best work practices should always be a priority for employees involved in wastewater management operations, including those at wastewater treatment facilities. This should include using the engineering and administrative controls, safe work practices, and PPE required for work tasks when handling untreated wastewater” (<https://www.osha.gov/SLTC/covid-19/controlprevention.html#solidwaste>). These should also be carefully applied when working in areas where splashing, aerosols, airborne particles or droplets of untreated sewage may be present.

Workers who handle human waste or sewage may be at increased risk of becoming ill from a number of waterborne diseases, potentially including SARS-CoV-2, the causative agent of COVID-19. Although the World Health Organization has indicated that “there is no evidence to date that COVID-19 virus has been transmitted via sewerage systems, with or without wastewater treatment” (<https://www.epa.gov/coronavirus/coronavirus-and-drinking-water-and-wastewater>) emerging data indicates that active virus may be present in fecal matter from some infected individuals. Thus, in the current pandemic, with increased disease rates in the community, SARS-CoV-2 may be present in untreated sewage.

Best practices for protecting the health of workers at wastewater treatment facilities should be followed. Workers should wear appropriate personal protective equipment (PPE), which includes protective outerwear, gloves, boots, goggles, a face shield, and a mask; they should perform hand hygiene frequently; and they should avoid touching eyes, nose, and mouth with unwashed hands.

The CDC “[Guidance for reducing health risks to workers handling human waste or sewage](https://www.cdc.gov/healthywater/global/sanitation/workers_handlingwaste.html)” (https://www.cdc.gov/healthywater/global/sanitation/workers_handlingwaste.html) provides

additional information on Basic Hygiene Practices for Workers and Personal Protective Equipment (PPE). Note that while CDC calls for use of a “protective face mask or splash-proof face shield”, use of both is recommended to provide additional protection against potential splashes or other airborne droplets in areas where splashing, aerosols, airborne particles or droplets of untreated sewage may be present.

According to the CDC (<https://www.cdc.gov/coronavirus/2019-ncov/hcp/faq.html>), “coronaviruses are susceptible to the same disinfection conditions in community and healthcare settings as other viruses, so current disinfection conditions in wastewater treatment facilities are expected to be sufficient. This includes conditions for practices such as oxidation with hypochlorite (i.e., chlorine bleach) and peracetic acid, as well as inactivation using UV irradiation.”

Question (Safety4): Any additional guidance for best practices?

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

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

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.

Question (Safety5): What are the dangers of aeration and mixing? Does COVID aerosolize?

Answer: If present in untreated wastewater, it is possible that active viral particles could get into aerosols or airborne droplets if they are generated from wastewater treatment activities.

The CDC and several other organizations have issued information on this issue and guidance for workers relating to SARS-CoV-2 in wastewater and sewage. The current CDC Information is found at <https://www.cdc.gov/coronavirus/2019-ncov/php/water.html>. This guidance, and the additional safety recommendation to use both a protective face mask AND splash-proof face shield as noted under Question 3, should be carefully followed in situations where exposures to aerosols and airborne droplets of untreated sewage may occur.

Information on the Aerosolization of COVID-19 (Aeration tanks, pumping, septic tanks) has also been published in the University of Minnesota – Water Resource Center (Wastewater and Coronavirus (COVID-19): What are the risks? Published 3/20/20 and can be found here:

<https://septic.umn.edu/wastewater-and-covid19>. This publication includes work practice and PPE information.

Secondary treatment aeration processes would be the most likely to expose wastewater treatment facility staff to airborne pathogens. While, in some cases, these are enclosed processes where there is no exposure, in most cases, these are open-air tanks with coarse or fine bubble air diffusers at the bottom of the tank to create aerobic conditions in the tank. Paddle mixers (less frequent, but still present in some facilities) used for aeration will kick up more wet spray than the bottom-of-tank diffusers. Trickling filters, where the wastewater is sprayed over rock media, could also create airborne pathogens. Operations staff will normally need to monitor operations in these tanks by collecting samples to measure suspended solids and to check dissolved oxygen levels (sometimes there are DO probes installed permanently in these tanks, but they would need occasional operation and maintenance [O&M]). As such, these would be intermittent, short-duration tasks. There may be a few plants with dissolved air floatation for sludge processing, but this process would not create the same risk – the biggest risk for airborne pathogens will be in the aeration process. Of course, PPE would minimize any risk (see Question (Safety11)).

While perhaps not presenting the same airborne risk, there are many other WWTP operations which may routinely expose staff to wastewater/solids, including sampling and analytical activities, process monitoring (e.g. sludge depth testing), equipment O&M. These would expose the operators to wastewater and wastewater residuals, so there could be a high risk of skin contact if they are not wearing appropriate PPE. Note that exposure to unbroken skin other than mucus membranes does not present any direct risk of infection but may increase the potential for secondary exposures attributable to hand-to face-contact or from secondary contamination of other surfaces.

Question(Safety6): Is smoking in wastewater treatment facilities a concern?

Answer: First, there are inherent hazards in smoking in some areas of wastewater treatment works, in that there can be both fire and explosion hazards from sewage gases and/or chemicals used (e.g. methanol), so smoking should be avoided if not prohibited in areas at and near the treatment works. With the onset of the Covid-19 concerns, there could be increased potential of contact through contact with wastewater and then contact with the face/mouth while smoking. MassDEP suggests following MassDPH, WHO, and CDC best protocols to avoid contact.

Question(Safety7): What about safety concerning septic systems and hauling?

Answer: Educate yourself and your staff about the virus, basic hygiene practices, proper use of personal protective equipment (PPE) and social distancing (both on and off the job – *to reduce community spread, do not go to work if you are sick*). Recommended PPE includes water-repellent gloves, goggles, rubber boots, and hand sanitizer (60% alcohol or greater). This basic PPE should be provided to all staff who are in the field or who potentially will come into contact with septage. Below are links to guidance on worker exposure and PPE. Please contact MassDEP with any questions.

- <https://www.wef.org/news-hub/wef-news/the-water-professionals-guide-to-the-2019-novel-coronavirus/>
- <https://www.cdc.gov/coronavirus/2019-ncov/php/water.html>
- https://www.cdc.gov/healthywater/global/sanitation/workers_handlingwaste.html

- <https://www.osha.gov/SLTC/covid-19/controlprevention.html>

Question(Safety8): A Board of Health Agent received a call from an electrician who wires aeration units on Innovative/Alternative (I/A) Title 5 systems. He is concerned that the blowers on these I/A systems may create aerosols from sewage and therefore spread Covid-19. Can MassDEP provide any information and guidance on this topic?

Answer: The aeration units for I/A systems are contained within the tanks underground. This would contain most of the aerosols that may be generated. Additionally, it is important to note that for operational purposes the aeration units of these systems should be set at a low enough rate that it minimizes the potential creation of any aerosols. The Department is not considering any directive to shut these systems down. The Department does recommend maintaining a safe distance from any vents to these systems as a precaution.

Question (Safety9): Are there any plans for precautionary testing of critical water and wastewater employees in order to prevent spread of COVID-19 throughout our workforce? Also, is MassDEP considering issuing guidance for isolated operation of our Water Pollution Control Facilities while employees are infected. This could become an issue with smaller WPCFs.

Answer: MassDEP is not issuing guidance on the testing of operators. Facilities should work with a healthcare provider for any testing they believe is warranted. MassDEP is not issuing guidance for isolated operation if employees are infected. Facilities should work with their town or company and have an emergency plan in place. For any staffing changes, please notify the MassDEP Regional Office or your EPA facility contact. Also, the Baker administration does provide guidance on testing generally on Mass.gov and can be found at <https://www.mass.gov/info-details/frequently-asked-questions-about-covid-19#should-i-be-tested?>

Question(Safety10): I have always completed a walk-through of a customer's house as part of a Title V Inspection. With the pandemic of Coronavirus, this is not possible. What should I do?

Answer: MassDEP recommends that the inspector put a comment on the front of the inspection report stating, "Due to COVID-19 issues, the inspector did not enter the premises. Additional information was gathered by the inspector from the home owner or Board of Health via phone or email." Provide documentation of that phone call or email.

Question (Safety11): Are there any recommendations for minimizing risks of contracting COVID-19 from wastewater operations, particularly from those wastewater treatment elements which may create more airborne risks, such as aeration tanks, weirs, flumes, sludge processing areas, and confined space areas which may be subject to turbulent flows?

Answer: Recognizing that personal protection equipment supplies may have been exhausted and are difficult to come by, which may limit some facilities ability to implement the safety recommendations noted under Question 3, MassDEP recommends that operational activities in areas where airborne exposure risks are higher be curtailed or modified to the extent feasible, but remain sufficient to retain adequate operating conditions in the plant. Modifications may include: relying on permanent

dissolved oxygen (DO) probes in aeration tanks; reducing process control sampling temporarily; observing aeration tank conditions remotely where possible; collecting samples at locations with less risk of airborne pathogens (such as effluent channels from aeration tanks), where sampling is needed; using sampling poles to provide more remote sample collection, and avoiding downwind areas proximate to the aeration tanks at the treatment works. Always notify the appropriate MassDEP Regional Office or EPA contact of any changes to your operations and sampling processes.

Question (Safety12): Can operations and activities be modified to reduce exposure potential? For example, should sampling be conducted at different locations or at reduced frequencies and should there be operational changes during sampling to reduce aerosols?

Answer: Facilities could do all the suspended solids sampling from the effluent conduit from the aeration tanks, which would be subject to less agitation and hence, create fewer airborne pathogens. However, for dissolved oxygen, if they do not have DO probes, they would likely want to take a DO measurement near the tail end of the tank. They could reduce aeration to reduce the intensity of any airborne pathogen spray, but they would need to ensure that doing so would still retain the minimal DO concentration needed to support secondary treatment (generally > 2.0 mg/l). Facilities must notify the appropriate MassDEP Regional Office or EPA contact of any changes to their operations and sampling processes.

Question (Safety13): Should staff be trained in and follow CDC procedures for protecting against exposure to pathogens?

Answer: Licensed wastewater operators have already received training in personal protection and reducing the risk of exposure to pathogens given the nature of their work, so they should be fully aware of the needed safety measures. We have provided the links to OSHA, CDC, and Water Environment Federation (wastewater industry organization) guidelines in this document. MassDEP recommends that staff be reminded to carefully implement all safety measures (see Q3 and Q11).

Inspections and Repairs

Question (Inspections/Repairs1): 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: MassDEP intends to arrange for and carry out any inspections needed to ensure protection of public health and the environment and which are necessary for systems to carry out their functions. Please continue to let MassDEP know if you will be needing an inspection.

Question(Inspections/Repairs2): Are collection system and pump station/wet well inspections still required to be done?

Answer: Yes. If there are facility-specific reasons why such inspections cannot be performed without endangering personnel or the public, please contact the appropriate DEP Regional Office.

Question (Inspections/Repairs3): Is there any guidance/recommendations regarding repair work (other than emergency work) within the collection systems?

Answer: Wastewater systems should discuss priority projects with their MassDEP regions. If immediate repairs are needed to retain the system in a functional condition, those actions should not be delayed.

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 314 CMR 12.00, for wastewater treatment facilities. Facilities should notify their MassDEP Regional Office of such shortages. Facilities should review these portions of their emergency response plans and prepare for the possible implementation of the emergency response plans if circumstances warrant it. MassDEP will work with facilities that are confronting absences to help determine whether other operators may be available to assist or whether remote operations (SCADA) may be sufficient during this emergency time period to substitute for some on-site practices.

Question (Staffing2): What if operators at small systems (facilities that are graded 4 or less) are unavailable due to illness?

Answer: Under existing rules, the person in direct responsible charge during the absence of the Chief Operator can be one grade below the grade of the plant. The Regional Office should be notified. For other situations, MassDEP will review requests received from systems expeditiously.

Question (Staffing3): How can we get more licensed operators?

Wastewater treatment facilities: Identify operators who can assist, including recently retired operators who are familiar with your system, and operators whose licenses recently expired (December 31, 2019).

Wastewater operators: Ensure that your license is active. Here are the options for obtaining a current license:

License Renewal

All licenses that expired on December 31, 2019 have been given an extension to renew. Due to the potential shortage of necessary wastewater operators and the closing of the exam site until April 13th, the Board is giving all operators an opportunity to remain active in the field. If your license has an expiration date of December 31, 2019 and you want to renew, please contact Michelle Jenkins, NEIWPC at 978-349-2516 to complete the necessary form and payment.

Inactive status

(Status change form: <http://neiwpsc.org/wp-content/uploads/2018/07/statchng.pdf>)

For any operator who is currently under inactive status and could be needed as a backup operator for your facility, the Board will waive the requirement that an inactive operator needs 10 TCH before going back to active status. If you know any operators who have recently gone to inactive status, please reach out to them now about their potential to reactivate and work potentially as a backup operator.

Emergency Certification

(Form: http://click.neiwpsc.org/training/training-docs/emergency_cert.pdf)

In accordance with 257 CMR 2.00, any person requesting emergency certification must apply in writing to the Board of Certification. Through a majority vote and for a good cause shown, the Board will grant Emergency Certification to enable an operator to work at a specified facility in a position for which the operator is not otherwise certified. Emergency Certification shall not be granted to employees or managers of contract operation and maintenance firms. Emergency Certifications shall be valid for no longer than six months. Because the exam site is closed until April 13th, operators who have been preparing to take the exam will be allowed to apply for emergency certification to allow them coverage until the exam site is back open and exams can be taken again.

Reciprocity

(Form: <http://click.neiwpsc.org/training/training-docs/reciprocity.pdf>)

Wastewater operators certified in another state are able to be certified in Massachusetts through reciprocity. In accordance with 257 CMR 2.00, any person requesting reciprocity must be a certified wastewater treatment plant operator. Your certification must have been based on an examination process recognized by the Commonwealth of Massachusetts or the Associated Boards of Certification (ABC).

Contact

For any questions on wastewater operator licensing please contact John Murphy, Wastewater Operator Certification and Training – MassDEP (john.j.murphy@mass.gov or 617-292-5867).

Question (Staffing4): What else can a system do to increase its number of operators?

Answer: 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 (Staffing5): 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 Board 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 the Board on identifying any authority to extend license terms.

Question (Staffing6): If an operator's family member is quarantined, should the wastewater facility 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 you have any guidance on how to advise the wastewater system?

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

Question (Staffing7): 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? Should the staff that are de-watering and performing lab procedures be rotated to eliminate a singular person to be exposed to probably the worst atmosphere possible? Should the personal that perform sludge hauling duty be rotated as well?

Answer: MassDEP encourages and supports all actions to ensure the continuity of treating wastewater during this emergency period, and for the safety of operations staff. Wastewater facilities should take all actions they determine to be necessary to provide the proper treatment and disposal of wastewater during this period and should inform their MassDEP regional office of all such plan or actions. If a split staffing approach is to be implemented, the staffing must always include a properly licensed staff person in responsible charge of the treatment works.

Question (Staffing8): 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 Wastewater Operators be deemed "essential" and able to travel regardless of whether they are a private entity? Who makes this determination? What documentation is needed by operators and who will provide it?

Answer: The Water and Wastewater section of Exhibit A to the Order issued by Governor Baker on March 23, 2020 is covered under the public works section to "support the operation, inspection and maintenance of essential public works facilities and operations", including water. Please see details here: <https://www.mass.gov/doc/covid-19-essential-services>.

Question (Staffing9): Can an Operator in Training (OIT) be granted full status to help fill in needs for operators?

Answer: These will be reviewed on a case by case basis through the emergency certification process. Contact john.j.murphy@mass.gov for more details.

Question (Staffing10): 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 for perhaps an extended period of time.

Answer: On April 3, 2020, Governor Baker signed “An Act to address challenges faced by municipalities and state authorities resulting from COVID-19” (H4598) into law. The law exempts: (i) any person who has been retired and who is receiving a pension or retirement allowance from the commonwealth, a county, city, town, district or authority; and (ii) any person whose employment in the service of the commonwealth, county, city, town, district or authority has been terminated by reason of having attained a specified age without being entitled to any pension or retirement allowance from the caps on hours worked and earnings received during the state of emergency issued by the Governor on March 10, 2020.

Question (Staffing11): Where is the list of licensed operators?

Answer: Here is the operator search tool. If you don't enter a name you have access to all licensed operators with their city/state location, level of certification and expiration date.

<https://portal.neiwpcc.org/wwo-search.asp>

Question(Staffing12): Is it ok to reduce staffing to one operator per shift?

Answer: If there is any change in staffing the DEP Regional office should be notified. Reducing staffing to a single operator may raise safety concerns. There are some tasks that may require two people to perform safely (confined entry, etc...). Operators should coordinate with DPW or have a non-licensed staff person available for these activities - even if they use separate trucks, etc, to ensure safety.

Question(Staffing13): My public water utility would like to join MA WARN but does not have access to signatories during the COVID 19 emergency. Can the signature requirement be waived, or can my utility sign the membership agreement electronically?

Answer: 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 MAWARN: <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 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.

Question (Staffing14): Are municipal stormwater permit (MS-4) activities and the people who conduct these activities considered to be “essential” per Governor Baker’s list?

Answer: Yes, essential workers include those involved in public works and wastewater, which include personnel involved in stormwater management activities. EPA has issued some guidance on this – municipalities regulated by EPA’s MS4 permit are encouraged to keep doing the work required by their permits. If they cannot, they should keep track of what cannot be completed and report this in their annual report. Please contact Newton Tedder (tedder.newton@epa.gov) of EPA Region 1’s MS4 program for further information.

Residuals/Sludge

Question (Residuals 1): What are the available resources/outlets for solids management in this region?

Answer: MassDEP is compiling a list of these facilities. A partial list is available at the end of this document.

Question (Residuals2): There are concerns about sludge disposal transportation and the availability of haulers.

Answer: Septage hauler companies have been contacted and anticipate little to no disruptions at this time. Facilities should notify their MassDEP Regional Office of any changes in the ability to get a septage hauler to service the facility.

Question (Residuals3): Are sludge haulers considered essential personnel?

Answer: The Water and Wastewater section of Exhibit A to the Order issued by Governor Baker on March 23, 2020 includes workers who "support the operation, inspection and maintenance of essential public works facilities and operations." Sludge haulers play an important role in wastewater treatment operations.

Septage

Question (Septage1): Are there recommendations for facilities treating septage? Any guidance on those facilities accepting septage?

Answer: MassDEP's Office of Research and Standards is reviewing the most current data available for the presence of COVID-19 in fecal matter. MassDEP will provide any updates it discovers, including those that relate to the handling of septage. It is advisable to follow the current CDC guidelines established for wastewater. Please also see the recommendations noted in Question Safety 3 of this document. MassDEP has compiled a list of facilities that accept septage. This list can be found at the end of this document.

Question (Septage2): What should a septage hauler do if a wastewater treatment plant will not accept its waste?

Answer: Proactively communicate with the treatment plants that you frequently utilize for disposal. Massachusetts' municipal wastewater treatment plants remain in operation. However, in response to COVID-19 outbreak and to maintain staffing, these facilities may be limiting hours and rotating staff on shifts or scaling back on the number of staff working in the facility at the same time. As staffing is reduced, some facilities may, in turn, have reduced capacity to receive septage. We are encouraging haulers to speak directly with the facility operators and, if requested, adjust their workloads so that emergency pump outs and crucial jobs are prioritized over routine septic maintenance/pump outs. For additional assistance or questions, please contact a DEP Regional Office.
<https://www.mass.gov/orgs/massachusetts-department-of-environmental-protection>.

Sampling and O&M

Question (Sampling/O&M1): Can sampling requirements at the facility be reduced or suspended?

Answer: The facility should make best efforts to continue to monitor and sample as required by its discharge permit. The facility should contact its MassDEP Regional Office or EPA's Michael Cobb regarding any difficulties or changes made in the sampling schedule.

Question (Sampling/O&M2): The facility served by the WWTP I operate is shut down and now not generating any wastewater flows. Am I required to sample?

Answer: If there is no effluent discharge for the month, there is no permit requirement to sample plant flows. On eDEP reports, the daily summary sheet should indicate dates for which there was no discharge. Sampling requirements for monitoring wells remain in place. In addition, under these conditions, operations staff should take actions to retain the biomass to the maximum extent feasible, so that the plant can go into a favorable operating condition quickly once wastewater flows are restored. The operations staff should continue to log site inspections and actions in the facility operations logbook.

Question (Sampling/O&M3): Non-flushable products are becoming a problem at wastewater facilities. What can be done to stop the flushing of wipes, etc.?

Answer: MassDEP has posted on social media regarding this problem and will be posting information concerning the proper disposal of wipes and other non-flushable items on its wastewater webpages.

Question (Sampling/O&M4): Has there been any discussion regarding adjusting chlorine levels in the effluent to favor bacteria kill versus the current goal to achieve a controlled partial kill?

Answer: According to the Occupational Safety and Health Administration (OSHA), “coronaviruses are susceptible to the same disinfection conditions in the healthcare setting as other viruses, so current disinfection conditions in wastewater treatment facilities is expected to be sufficient.” However, where possible, if the permittee wishes to effect a more rigorous disinfection process, MassDEP supports this approach, so long as there are controls to prevent against toxic impacts at and near the point of discharge.

Question (Sampling/O&M5): Has there been any discussion regarding adjusting treatment goals? For example, is it permissible if needed to forgo nitrification?

Answer: The facility should make best efforts to continue to treat, monitor, and sample as required by its discharge permit. The facility should contact its MassDEP Regional Office in regard to any changes made in the treatment provided or any planned bypass.

Question (Sampling/O&M6): We are not requiring operators at the plant to enter the headworks of the plant or to take Sludge Judge readings at both the Primary and Secondary tanks. Also, we are not performing any non - necessary maintenance at the plant. The sprayers are turned off to both the Aeration tanks and Secondary Tanks. Is this OK?

Answer: MassDEP encourages and supports all actions to ensure the continuity of treating wastewater during this emergency period, and for the safety of operations staff. Wastewater facilities should take all actions they determine to be necessary to provide the proper treatment and disposal of wastewater during this period and should inform their MassDEP regional office of all such plan/actions and of any deviations from their O&M plans.

Question (Sampling/O&M7): Would MassDEP be open to adjusting compliance schedules within its jurisdiction? If yes, how long of an extension would generally be allowed?

Answer: If a facility has a compliance schedule and believes an extension is required, they should contact its Mass DEP Regional office. These will be evaluated on case-by-case basis.

Question (Sampling/O&M8):What discussions MassDEP has had with U.S. EPA Region 1 on issues related to compliance schedules, reporting extensions and other deadlines that are under EPA’s jurisdiction (ACOs, Consent Decrees, NPDES permits, etc.)?

Answer: MassDEP has been in contact with EPA. MassDEP and EPA are also consulting with one another on facility specific requests and will continue to stay in touch on these issues. Questions related to EPA-issued enforcement orders and consent decrees should be directed to EPA, but MassDEP would appreciate being copied on these requests. Questions related to MassDEP-issued enforcement orders for NPDES permits should be directed to the appropriate MassDEP regional

office. For questions related to NPDES permit compliance, please remember to make requests to EPA and MassDEP since the NPDES Program is jointly administered.

Question (Sampling/O&M9): For Industrial Pretreatment Programs (IPP) and required industrial sampling and inspections, how will business closures and access for required sampling and inspections be addressed?

Answer: If the facility is in operation and discharging wastewater, it needs to have a certified operator present. If the facility is closed and not operating no inspections or sampling need to be done and it should be reported as no discharge.

Question (Sampling/O&M10): For those of us with septic systems, what household cleaners are you using that will kill the virus & yet be ok for septic systems?

Answer: EPA has list of disinfectants for COVID. <https://www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2>. It is generally recommended that disinfecting cleaners be used. While it is likely that people are doing more frequent handwashing and more cleaning with disinfectants given the current health threats associated with Covid-19, if these products are used in their intended way, there should not be any severe impacts to the septic system given typical daily volumes discharged. Disinfectant wipes, paper towels and Kleenex should not be flushed to any wastewater system, including a septic system.

Question (Sampling/O&M11): In the event that a sludge incineration facility's staff becomes incapacitated or unavailable, can incinerator operators from other states be substituted?

Answer: While there are no formal reciprocity provisions for states and facilities in the federal incinerator regulations, EPA has indicated that a qualified operator from another facility could work at a "new" facility in the event of COVID-19-related staffing shortages. As long as a qualified operator receives training on the site-specific elements of the "new" facility, for example training requirements **(iii)-(ix) of §62.15920(c)(1)** (see below) as found in the Sewage Sludge Incineration (SSI) Federal Plan, EPA believes the operator training requirements would be fulfilled. EPA views these requirements as something an operator should be familiar with anyway when learning how to operate the "new" facility. If this situation arises, the facility should contact EPA and detail specific reasons why the staff substitution is needed. Documentation that the necessary site-specific training was completed by the visiting operator should be kept with other records related to qualified operator requirements.

40 CFR §62.15920(c)

(c) Training must be obtained by completing an incinerator operator training course that includes, at a minimum, the three elements described in paragraphs (c)(1) through (3) of this section:

(1) Training on the 10 subjects listed in paragraphs (c)(1)(i) through (x) of this section:

(i) Environmental concerns, including types of emissions;

(ii) Basic combustion principles, including products of combustion;

(iii) Operation of the specific type of incinerator to be used by the operator, including proper startup, sewage sludge feeding and shutdown procedures;

(iv) Combustion controls and monitoring;

- (v) Operation of air pollution control equipment and factors affecting performance (if applicable);
- (vi) Inspection and maintenance of the incinerator and air pollution control devices;
- (vii) Actions to prevent malfunctions or to prevent conditions that may lead to malfunctions;
- (viii) Bottom and fly ash characteristics and handling procedures;
- (ix) Applicable federal, state and local regulations, including Occupational Safety and Health Administration workplace standards; and
- (x) Pollution prevention.

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. Wastewater facilities 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): Are laboratories that do water quality testing to ensure fit and pure water and compliance with regulatory requirements would be considered "Essential Services" for purposes of the Order issued by Governor Baker on March 23, 2020?

Answer: They are. Laboratories are listed as essential in the Water and Wastewater section of Exhibit A to the Governor's Order, which includes personnel for "required sampling or monitoring" and for "distribution and testing."

Question (Lab3): The current Water Pollution study for laboratories closes on April 23, 2020 with no grace period. Any results not entered in the database by that date are considered not acceptable. If a laboratory fails to report a second time, it loses certification in that parameter. Will EPA consider a one-year extension of that deadline to April 2021.

Answer: EPA is extending both Study 40 and Study 39 and is developing guidance. The EPA contact is Greg Savitske, at (202) 564-2601 DMRQA@epa.gov

Question (Lab4:) Would DEP consider creating, and updating weekly, a list of laboratories and their current capabilities and contact information. It should identify drinking water and wastewater testing laboratories in service during the crisis.

Answer: DEP will investigate what information it has to create such a list and will update this response accordingly.

Chemicals and Other Supplies

Question (Supplies1): What if there is a shortage of necessary chemicals? Are chemical delivery companies considered essential personnel?

Answer: Yes, they are covered under the Governor's directive that essential staff include "*Employees needed to operate and maintain public and private drinking water and wastewater/drainage infrastructure.*"

MassDEP wants to know what chemicals are most in short supply. If you are concerned that your facility is or may be running out of chemicals in the near future, please notify your MassDEP Regional Office 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.

According to the Order issued by Governor Baker on March 23, 2020, "Essential Services" include workers who transport basic raw chemicals.

Question (Supplies2): Does MassDEP require official notification of a reduction in chemical dosing, such as hypochlorite, to conserve use?

Answer: Conservation of chemicals may be used to extend supply but the facility is still required to comply with the limitations of its permit and should not limit the use to the extent it causes discharge violations. Please notify the U.S. EPA and DEP Regional Office of any chemical shortages you are or may have.

Question (Supplies3): Can we get a waiver to store more chlorine on-site over the coming months?

Answer: Yes. But with prior notification to and approval by regional MassDEP staff, permission will be granted so long as proper protections are in place on receipt, storage, and use of the disinfectant chemicals.

Question (Supplies4): Some wastewater facilities are ordering way more chemicals than they would normally need, and other suppliers are concerned about this. Wastewater 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 (Supplies5): Fuel supply and backup power? What if there is a shortage of fuel?

Answer: At this time, there have been no reports to MassDEP regarding the lack of sufficient fuel supply, or storage. If you are concerned about this matter, you should speak directly with regional MassDEP staff to determine appropriate next steps.

Reporting

Question (Reporting1): What are MassDEP's expectations of reporting going forward? We want to make sure reporting still takes place and the appropriate people in each region are receiving it.

Answer: For Groundwater Discharge Permit facilities, reports are required to be submitted through eDEP an online service provided by DEP and accessible from any computer with user name and password.

To submit to eDEP go to:

https://edep.dep.mass.gov/edep/DEPlogin.aspx?_ga=2.52116073.1959123745.1584731304-1877506371.1584731304 .

Please contact Linda Barba, Linda.Barba@mass.gov or 617-556-1150 with any eDEP questions for Groundwater Discharge reporting.

For NPDES Facilities, reports are required to be submitted through netDMR, which can be accessed here: <https://cdx.epa.gov>. Please contact Neil Handler, handler.neil@epa.gov .

Question (Reporting2): Can MassDEP give wastewater facilities time extensions on paperwork deliverables, such as 15-year Engineering Assessments, DMR's, and staffing plans?

Answer: MassDEP will consider these types of requests and will continue to re-evaluate circumstances throughout the spring and summer. Groundwater discharge facilities should contact their regional office of MassDEP to request extensions for any paperwork they think will be submitted late. NPDES facilities should contact their regional MassDEP office, as well as U.S. EPA to request extensions. EPA contacts are Dave Turin (turin.david@epa.gov; 617-918-1598) for the Southeast Region and Doug Koopman (koopman.douglas@epa.gov; 617-918-1747) for all other regions.

Question (Reporting3): What should we do about the NPDES Discharge Monitoring Report Quality Assurance (DMR-QA) Study 40?

Answer: EPA is aware of the challenges posed by the COVID-19 pandemic. To address these challenges and provide greater flexibility to regions, states, PT providers, permittees and laboratories, EPA has decided to continue this year's study under a modified schedule. We will accept DMR-QA proficiency test (PT) standards that were ordered on or after March 20, 2020. We will continue to accept Water Pollution (WP) PT standards where the study closed on or after January 1, 2020. The Study 40 closing date and all other milestones will be extended to allow participants additional time to complete the study.

The following table provides new milestones for DMR-QA Study 40. If you have any questions or concerns about the revised dates, please let Greg Savitske (Savitske.Gregory@epa.gov) know as soon as possible.

Date	Milestone
March 20, 2020	DMR-QA Study 40 begins, labs may begin ordering PT samples
May 29, 2020 (was April 24)	Address Verification Forms due to State DMR-QA Coordinator
October 2, 2020 (was July 2)	Study 40 ends. Labs: deadline to submit ungraded Data Report to PT Providers.
October 30, 2020 (was July 31)	PT Providers: deadline for sending graded results to labs
November 13, 2020 (was August 14)	Labs: deadline to send graded results to Permittees. For “Not Acceptable” results, labs to begin ordering retest samples as soon as possible
December 4, 2020 (was August 28)	Permittees: deadline to submit signed and completed Permittee Data Report Form to State DMR-QA Coordinator Labs: send corrective action letter including any retest results <u>as soon as possible</u> to your Permittee, if applicable.
January 29, 2021 (was October 23, 2020)	Permittees: deadline to submit Corrective Action Report, including retest results, to State DMR-QA Coordinator

Participants in this year’s DMR-QA study should focus on fulfilling day-to-day operations at their facility; the extended timeline we are proposing should provide greater flexibility for participants to complete study requirements. The EPA contact is Greg Savitske, at (202) 564-2601 DMRQA@epa.gov.

Question (Reporting4): Is there more guidance on NPDES permits?

Answer: EPA Region 1 has provided the following guidance, “NPDES Annual reports can be attached and sent through NetDMR for receipt by both EPA and MassDEP. For any questions related to NetDMR, contacts are Diane Castricone and Marie MacDonald. If for any reason a permittee cannot submit the report through NetDMR, it can be sent via email to EPA and MassDEP. For EPA, reports should be sent to Dave Turn (turin.david@epa.gov) for the Southeast Region and to Doug Koopman (koopman.douglas@epa.gov) for all other regions.” For MassDEP, reports should be sent to your regional office contact.

Question (Reporting5): What No Data Indicator (NODI) code should be used for COVID-19?

Answer: The NODI code “Z” is to be utilized for reporting in netDMR when sampling data are not available due to the COVID-19 pandemic. More information is available in the document entitled *Temporary Advisory for NPDES Reporting in Response to COVID-19 Pandemic*, issued by EPA on March 31, 2020.

Question (Reporting6): Will there be time extensions for submitting Annual Reports for Industrial Pretreatment Programs (IPP)?

Answer: The guidance in the EPA Memo *COVID-19 Implications for EPA's Enforcement and Compliance Assurance Program* issued by Susan Parker Bodine on March 26, 2020 applies to annual reports for IPPs.

Funding

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

Answer: There may be funds made available through FEMA to cities and towns, state agencies and certain non-profits in all Massachusetts counties to help pay for emergency protective measures (response costs) related to the COVID-19 pandemic. 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. Anyone seeking reimbursement will likely need to be able to provide documentation of expenses as well as the authority under which emergency actions were performed, i.e. state or federal emergency declaration.

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:

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 Intended Use Plan (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 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

Nathaniel Keenan, Deputy Director, Massachusetts Clean Water Trust
nkeenan@tre.state.ma.us

Question (Funding3): Is there any consideration for grant deadline extensions?

Answer: MassDEP is looking into extensions for existing grants for all of its programs. It is also considering allowing electronic submission of new grant requests and additional time for responding to these new grant requests.

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 and submit to Kirsten King at NEWWA.
- **Statewide Mutual Aid** - <https://www.mass.gov/service-details/intrastate-mutual-aid>

Reach out to your neighboring utilities to see what they may be doing to plan. Good communication before an event is key to response and recovery. If neighboring utilities are not members of MAWARN or other mutual aid, encourage them to join.

Check in with your chemical suppliers 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 (AdditionalInfo2): Where can I find information for the wastewater industries?

Answer: Below are links to helpful resources for the **wastewater industries**:

MassDEP

- Wastewater & COVID Guidance: <https://www.mass.gov/info-details/massdeps-covid-19-information-resources>
- Recordings of the Commissioner's calls, as well as Q&As for both wastewater and water supply are at: <https://www.mass.gov/lists/covid-19-information-for-drinking-water-and-wastewater-operators>
- Wastewater Programs: <https://www.mass.gov/wastewater>

Centers for Disease Control and Prevention (CDC)

- https://www.cdc.gov/healthywater/global/sanitation/workers_handlingwaste.html)
- <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>
- EPA document on enforcement and COVID-19 on 3/26: *COVID-19 Implications for EPA's Enforcement and Compliance Assurance Program*: <https://www.epa.gov/sites/production/files/2020-03/documents/oecamemooncovid19implications.pdf>
- EPA March 31st document link: <https://netdmr.zendesk.com/hc/en-us/articles/360041746231-Temporary-Advisory-for-National-Pollutant-Discharge-Elimination-System-NPDES-Reporting-in-Response-to-COVID-19-Pandemic>
- Disinfectants that can be used against COVID: <https://www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2>
- EPA press release: <https://www.epa.gov/newsreleases/epa-urges-states-support-drinking-water-and-wastewater-operations-during-covid-19>
- Letter: https://www.epa.gov/sites/production/files/2020-03/documents/wheeler_gov_covid-19_ow_3-27.pdf

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/>
- <https://www.wef.org/wef-waterblog/wef-waterblog/a-message-to-the-wef-community-about-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>

Question (AdditionalInfo3): Where can I find more general information?

Answer: Below are additional links to helpful resources:

U.S. Environmental Protection Agency

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

Centers for Disease Control and Prevention (CDC)

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

MA Department of Public Health (MDPH)

- <https://www.mass.gov/resource/information-on-the-outbreak-of-coronavirus-disease-2019-covid-19>
- <https://www.mass.gov/info-details/covid-19-guidance-and-directives#businesses-&-employment->

Solids Management Facilities

RMI - rmi@rmirecycles.com 603-536-8900

Casella - Patrick Ellis - patrick.ellis@casella.com 603-661-3820

Synagro - Pat Rimkoski - primkoski@synagro.com 860-483-0160

Waste Management - Jason Barroso - jason.barroso@wm.com or jbarroso@wm.com

UBCW is the only Massachusetts incinerator

MWRA is a dryer and pelletizer

Hoosac Valley is the only large compost facility

Gardner MA is the only sludge mono of which MassDEP is aware

There are some small-scale composters that recycle sewage sludge also.

Englobe (Quebec) is taking solids from at least northern New England; contact: Nicholas Leblanc, Nicholas.LebLANC@englobecorp.com, 819.829.0101, ext. 182033

Veolia runs two major merchant incinerators, one in CT and one in RI. contact: Dan Gorka, daniel.gorka@veolia.com, 401-265-1085

Denali Water provides solids management services, and has a significant presence in upstate NY: contact: Jason Fleury, jason.fleury@denaliwater.com, 479-498-0500

Agresource manages biosolids composts and other soil amendment products and has considerable expertise: info@agresourceinc.com, 978-388-5110

SEPTAGE RECEIVING FACILITIES

	Accepts septage from In town only	Accepts septage from other towns	Comments/additional info
SERO Cape and Islands			
Barnstable		some Cape towns limited	
Chatham	yes	no	
Edgartown		MV towns only/porta- potties	
Falmouth	yes	no	
Nantucket	yes	no	
Tisbury	yes - limited	no	
Yarmouth-Dennis Septage		Cape towns only	
SERO			
Attleboro WWTP		yes	
Bridgewater WWTP		yes	
Brockton WWTP		yes very little	
Dartmouth WWTP		yes	
Fairhaven WWTP		yes	
Fall River WWTP		yes	
Kingston		yes very little	
Mansfield WWTP		yes	
Marshfield WWTP		yes	
Middleborough WWTP		yes	
New Bedford WWTP		yes	
North Attleboro WWTP		yes	
Plymouth WWTP		yes	
Raynham		yes	Earth Source
Scituate WWTP		yes	
Taunton private		yes	Water Solutions Group
Taunton WWTP		yes	
Wareham WWTP		yes	
CERO			
Charlton	no	no	

SEPTAGE RECEIVING FACILITIES

	Accepts septage from In town only	Accepts septage from other towns	Comments/additional info
CRPCD Medway		member communities only	
Fitchburg		yes	
Grafton	yes	no	
Hopedale	yes	no	
Leominster		yes 20 communities	
Marlborough East and West		2 towns only	Marlborough and Northborough
Milford		3 towns only	Bellingham Hopkinton and Holliston
North Brookfield		yes	
Northbridge		yes	
Northbridge	no	no	
Southbridge		yes	
Spencer		yes	
Sturbridge		yes	
Templeton		yes	
Uxbridge		yes emergency only limited	
Webster/Dudley		yes	
Westborough/Shrewsbury		yes 3 towns only	Westborough, Shrewsbury and Hopkinton
WERO			
Belchertown	RV waste only	?	
Chicopee WWTP		yes	
Easthampton WWTP		yes	
Erving 1 & 3	yes	no	
Erving 2	no	no	
Great Barrington		yes	
Greenfield		yes	
Holyoke WWTP		yes	
Lee		yes	
Montague		yes	
Northampton		probably yes ?	
Palmer WWTP		yes	
Pittsfield		yes	
Stockbridge WWTP	yes	no	
SWSC		yes	Springfield Water and Sewer
Ware		not sure	
Warren		not sure	

SEPTAGE RECEIVING FACILITIES

	Accepts septage from In town only	Accepts septage from other towns	Comments/additional info
Westfield		yes	
Williamstown		yes	Hoosac Water Quality District
NERO			
Amesbury		minimally	
Concord	yes	no	
Gloucester		2 towns only	Gloucester and Essex
GLSD		yes	Greater Lawrence Sanitary Treatment District
Haverhill		yes	
Ipswich		only neighboring towns	
Lowell		yes	Lowell Regional Wastewater Utility ?
Merrimac		small quantities only	
MWRA		at designated sites	
Newburyport		only neighboring towns	
South Essex Sewerage District		yes	