



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

**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 will be establishing a weekly teleconference with public water suppliers where issues can be raised, discussed and solutions can be developed.

**Below are some answers to questions we have heard to date.**

## **Bacteria Sampling**

**Question (Bacteria1): 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 Mass.Gov's Covid page 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 (Bacteria2): 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 (Bacteria3): 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)?**

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 (Bacteria4): Can the operator use an outside spigot or hydrant for bacteria sampling?**

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.

**Question (Bacteria5): 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. MassDEP will exercise enforcement forbearance when the PWS has demonstrated that it has exercised every option for sample collection.

**Question (Bacteria6): 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 (Bacteria7): 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 (Bacteria8): What if I can't collect all my required bacteria samples or do so after the end of the month/quarter?**

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 (Bacteria9): Is there more guidance?**

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.

## **Other Sampling, Inspections and Repairs**

**Question (OtherSampling/Inspections1): We need to discuss non-RTCR distribution system sampling events like Disinfection By-Products or UCMR4.**

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 (OtherSampling/Inspections2): 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?**

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 (OtherSampling/Inspections3): 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 (OtherSampling/Inspections4): 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 cross-connection control programs and reschedule any surveys or tests to a later time in the year consistent with the state regulations, recognizing that we might have more guidance later.

**Question (OtherSampling/Inspections5): Can DEP give PWSs time extensions on paperwork deliverables, such as Sanitary Survey responses, DMR's ASR's, 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 (OtherSampling/Inspections6): 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 (OtherSampling/Inspections7): 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.

## 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 region it is going to and the program (e.g. NERO RTRC. Or SERO Inorganics).

## 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.

**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): How can we get more licensed operators?**

Answer: DPL and MassDEP and the Board of Certification of Operators of Drinking Water Supply Facilities can grant temporary emergency certificates (six months) or provisional certificates (six months) to help meet this need while these operators are working through DPL's recertification requirements.

The Board of Certification of Operators of Drinking Water Supply Facilities and the Board of Registration of Operators of Wastewater Treatment Facilities are authorized by regulation to issue emergency certifications and registrations that can last for up to six months.

Identify individuals who can run your system.

- Reach out to recently retired operators (preferably with valid licenses and appropriate grades) who are familiar with the system.
- Reach out to recently retired operators whose licenses may have recently expired (12/31/19).
- Reach out to other professionals (such as licensed Professional Engineers) who are familiar with operating a public water system and can assist the PWS in providing a clean source of drinking water to the public.

File for temporary emergency certification from the Department of Public Licensure. (Link to application) <https://www.mass.gov/doc/temporary-emergency-certification-application-0/download>. Consider submitting requests for a temporary emergency certification or provisional certification now as a planning activity.

**Question (Staffing6): What steps must be taken if the PWS is going to use replacement operators?**

Answer: The public water system should complete the "Temporary Emergency Certification Application" <https://www.mass.gov/doc/temporary-emergency-certification-application-0/download> and send 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). If the replacement operator's license has expired or they are unlicensed, please have them include resumes and any other pertinent professional information. This will allow DPL and the Board evaluate each candidate. Details being discussed with DPL.

**Question (Staffing7): 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 (Staffing8): 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 (Staffing9): 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 be addressed on a case-by-case basis by the facility based on available information and working with public health authorities.

**Question (Staffing10): 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 (Staffing11): 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 (Staffing12): 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.

## **Safety**

**Question (Safety1): How should they respond to routine water quality complaints?**

Answer: The following links from OSHA and information from Mass.Gov's Covid page provide the most up-to-date guidance: <https://www.osha.gov/Publications/OSHA3990.pdf> and COVID information at <https://www.mass.gov/info-details/covid-19-guidance-and-directives>

**Question (Safety2): There is no response from regional state drinking water staff**

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

**Question (Safety3): Does MEMA arrange for personal protective equipment 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.

**Question (Safety4): 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: As long as 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>

**Question (Safety5): We know MassDEP is strongly encouraging the continuation of water quality monitoring. When should an operator not enter a system to monitor or inspect? What are best practices that the water and wastewater service providers should follow?**

Answer: In addition to stating that 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 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>). The MassDEP regional office should be consulted if an operator does not feel comfortable entering a system.

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. This includes conditions for practices such as oxidation with hypochlorite (i.e., chlorine bleach) and peracetic acid,

as well as inactivation through the use of ultraviolet irradiation. There is no evidence to suggest that additional, COVID-19-specific protections are needed for employees involved in wastewater management operations, including those at wastewater treatment facilities. Wastewater treatment plant operations should ensure workers follow routine practices to prevent exposure to wastewater, including using the engineering and administrative controls, safe work practices, and PPE normally required for work tasks when handling untreated wastewater” (<https://www.osha.gov/SLTC/covid-19/controlprevention.html#solidwaste>).

**Question (Safety6): 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>).

## 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.

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.

## 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: 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; 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.

## **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>

**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 water and wastewater industries?**

Answer: Below are links to 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>

### **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>

### **Question (AdditionalInfo3): MassDEP is holding regularly scheduled calls with public water supplies, Will there be a similar phone call to discuss wastewater operation questions?**

Answer: MassDEP will hold such a call soon and will provide call-in information to the wastewater industry.