March 18, 2020

Dear wastewater operators and managers,

As we respond to COVID-19, DEQ remains committed to helping you maintain a safe and healthy workplace so you can continue to provide vital services to your communities and protect water quality. You may have questions regarding how to handle various situations, and we will try to address as many of those as we can. As you are aware, the situation is changing rapidly so we will do our best to adjust with it and keep you as informed as possible. We are also committed to using whatever discretion and flexibility we have to appropriately deal with situations as they arise.

**How should treatment plants respond to the COVID-19 outbreak?**

- Use best practices for worker safety including engineering and administrative controls, and appropriate personal protective equipment. More information is available at [https://www.osha.gov/SLTC/covid-19/controlprevention.html](https://www.osha.gov/SLTC/covid-19/controlprevention.html).
- Plan now for possible shortages of personnel or supplies. Identify key personnel and their backups.
- Be in contact with your local emergency management organization (city or county level) and local health district.
- If possible, provide information to your community regarding potential concerns or impacts that may occur during this outbreak. DEQ is working to compile resources to help with this.

**What is DEQ doing?**

- DEQ participates in the state-level emergency response as directed by the Idaho Office of Emergency Management.
- DEQ permit writers and compliance officers are available via phone or email to provide technical assistance.
- DEQ is compiling information for use as a public service announcement and will provide information on the various social media platforms, likely within the next few days.
- DEQ is evaluating the schedule for inspections and if your facility is supposed to have an inspection this year, we will be working with you to ensure that any scheduled inspection would not impose an undue burden during this event.

**What to do about required testing and reporting?**

- There is no legal mechanism to suspend IPDES or recycled water permit requirements. However, the IPDES and Wastewater Engineering Bureaus will evaluate situations and use enforcement discretion as applicable.
- Consult with your regional compliance officer if you have special circumstances or issues that would affect your permit compliance.
- Continue with regular and routine sampling, monitoring, and reporting to the best of your ability.
- If you are unable to collect a sample, or if the lab is unable to analyze the sample:
  - IPDES dischargers – Use NODI 3 Special Report Attached and include a short statement regarding the situation, or use NODI 2 (or K).
  - Reuse facilities - note in the appropriate log that a sample was not collected or analysis not done.
  - Follow-up with an email to your regional contact to alert them of the circumstances leading to the missed sample or analyses.
- If you become aware of an event that requires 24-hour reporting and the 5-day written report please still report accordance with your permit.
Links to helpful resources:

- Water Environment Federation – The water professional’s guide to COVID-19
- Centers for Disease Control and Prevention – Water Transmission and COVID-19
- EPA – Coronavirus and Drinking Water and Wastewater
- Water Environment Federation – Will It Flush?
  https://www.youtube.com/watch?v=SLTVqkXVvNk

As always, please reach out to your regional office if you have questions or concerns on how to comply with your permit.

Sincerely,

Mary Anne Nelson, Administrator
Surface and Wastewater Division