



TOM WOLF, GOVERNOR • PATRICK MCDONNELL, DEP SECRETARY

## **IMPORTANT MESSAGE FROM THE PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION (DEP), BUREAU OF CLEAN WATER (BCW)**

*You are receiving this message because you are listed as the responsible official, operator, or otherwise associated with a wastewater treatment facility in DEP's data systems for a Sewage Treatment Plant (STP) which treats wastewater (sewage) within Pennsylvania*

### **HOW CAN YOU PREPARE NOW TO HELP REDUCE THE IMPACTS OF COVID-19 (CORONAVIRUS) WITHIN YOUR STP?**

As you are aware, the coronavirus disease has spread to numerous states including Pennsylvania. It is very important that wastewater sector professionals keep informed regarding this rapidly evolving situation and take appropriate preparatory and other steps to ensure continued operations and protection of public health. Several resources are available to keep you informed, including the [Pennsylvania Department of Health's \(DOH\) Coronavirus webpage](#). [Additional resources specific to the wastewater sector are available from the Water Environment Federation](#).

During this situation, STPs should take appropriate steps to ensure continued operations with a focus on treatment effectiveness for pathogens. This must include disinfection practices that meet NPDES or WQM permit limits. It is believed that adequate disinfection to achieve fecal coliform limits will also provide protection against the Coronavirus.

The primary purpose of this email is to provide you with a framework of resources to evaluate and improve your current preparedness to maintain proper operation of your STP should you experience critical resource shortages.

## **IN ORDER TO “SELF-ASSESS” YOUR PREPAREDNESS, KEY PERSONNEL ARE STRONGLY ENCOURAGED TO CONSIDER THE FOLLOWING QUESTIONS AND POTENTIAL ACTION ITEMS:**

**1. STAFFING:** *How will we continue to adequately treat sewage wastewater should our primary operator(s) become sick or are quarantined? What alternate operational staff would we rely upon?*

### **Potential Action Items to Consider:**

- Review your Emergency Response and Operations and Maintenance Plans; make sure the plans are up to date.
- Review and update your records for existing personnel, including key duties, essential functions and training/certification records. Update contact information and cell phone numbers as needed.
- Identify any gaps in personnel and assess options for obtaining additional operational staff, such as relocating and training staff from other areas, or seeking additional staff as needed. Consider the benefits of your lead operator conducting training and a plant walk through with alternate staff before an emergency staffing limitation occurs.
- Well-written standard operating procedures (SOPs) are a critical tool that can enable a properly certified operator from a neighboring system, or inadequately certified staff to temporarily operate your water system should your primary operator(s) become unavailable. Consider the following questions:
  - Where are your SOPs? When were they last reviewed and updated by your lead operator(s)
  - Do SOPs contain enough detailed information to be used by the alternate staff you plan to rely upon? Who will make decisions regarding who can use these SOPs should your primary operator become unavailable?

- If your primary operator is quarantined, but well enough to work remotely, do you have a plan in place for them to provide verbal SOPs and guidance to alternate staff onsite at the sewage treatment plant?
- In order to reduce transmission of illness amongst your existing sewage treatment plant personnel, ensure that your sick leave policies are flexible and consistent with public health guidance and that employees are aware of these policies. More information about these recommendations is available from the DOH at the above link.

**2. ESSENTIAL TREATMENT CHEMICALS AND EQUIPMENT: *What vendor(s) would we contact should our primary vendor(s) not be able to provide essential chemicals and equipment in a timely manner?***

**Potential Action Items to Consider:**

- Have you considered that employee absenteeism from other interdependent sectors such as transportation, shipping, industrial equipment, chemical manufacturers and suppliers may limit and/or delay your ability to obtain essential operational supplies?
- Review and assess your inventory of essential treatment chemicals. Do you have up-to-date contact information for an alternate chemical supplier?
- Review and assess your inventory of essential plant equipment (e.g., chemical feed pumps). Are adequate backup chemical feed pumps, rebuild kits, and/or spare parts currently on site?
- If a vendor is unable to provide a critical component for a pump, would a neighboring sewage treatment plant have a spare? Consider the benefits of developing mutual aid agreements with other facilities for equipment through Pennsylvania's Water/Wastewater Agency Response Network (PaWARN). Are you a member of PaWARN? For more information, please [visit the PaWARN website](#) or call 717-774-8870.
- Check your inventory and expiration dates of sampling consumables (e.g., sampling reagents, bottles, etc.). How long would your current supply of sampling consumables last? Attempt to identify an alternate vendor that may be able to provide specific consumables necessary for compliance monitoring samples.
- Consider ordering additional supplies of treatment chemicals and reagents, keeping in mind the shelf-life and expiration dates of existing stock and any additional quantities you purchase.
- Are key staff with purchasing capability available to make purchases during afterhours or weekend emergencies? Has the board provided prior approval for emergency purchases of supplies, chemicals and equipment?

**3. LABORATORY TESTING: *If our primary wastewater testing laboratory cannot accommodate our samples, what alternate lab would we use?***

**Potential Action Items to Consider:**

- Similar to item #2 above, have you considered that employee absenteeism or supply chain shortages at your preferred wastewater testing laboratory may temporarily limit their ability to process your routine compliance samples?
- Consider identifying an alternate lab that is properly accredited to meet your specific water quality sampling needs.
- Here is the link to the Accredited Lab database: [Accredited Lab Database](#).
- Instructions for searching the Accredited Lab database can be found at: [Accredited Lab Database Instructions](#).
- Note that if due to emergency conditions you are not able to comply with monitoring requirements of your permit, you must acknowledge this through a Non-Compliance Report, which can be done through DEP's eDMR system. DEP will utilize enforcement discretion given your STP's circumstances.

**4. NOTIFICATION: *If we experience a breakdown in treatment or operations, will we be able to notify DEP and customers in a timely manner?***

**Potential Action Items to Consider:**

- It is very important to note that sewage treatment systems comply with the immediate oral notification requirements of [25 Pa. Code § 91.33](#) (relating to incidents causing or threatening pollution). Note, as per [25 Pa. Code § 92a.41](#), oral notification is required as soon as possible, but no later than 4 hours after the permittee becomes aware of the incident causing or threatening pollution. This includes a failure, significant interruption or breakdown in key sewage treatment processes or a lack of resources that adversely affect operations, such as staff shortages, notification by the power utility of planned lengthy power outages or imminent depletion of treatment chemical inventories.
- To meet this reporting requirement, [this webpage provides a list of emergency response contact numbers in your area](#).
- As per [25 Pa. Code § 91.33](#), for any imminent threat of a toxic substance or another substance which would endanger downstream users, if reasonably possible to do so, notify known downstream users of the waters of this Commonwealth.
- Despite your best efforts, a breakdown in treatment may occur. Accurate and timely communication with your customers is paramount, now more so than ever. If you do not have a contact plan or SOP, you should consider making one a priority. If you use an "auto-dialer", you should be certain that you have updated customer phone numbers.

*Thank you for your time and attention on this very important matter.*

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