

# Municipal Wastewater Utilities and COVID-19: Being Proactive During a Pandemic

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While the threat of contamination through exposure to wastewater is unlikely, there are additional steps municipal wastewater utilities can implement to not only protect its personnel and the users it serves, but to also contribute to the ongoing efforts to stop the spread of this deadly outbreak.

Steptoe & Johnson PLLC's environmental team recommends the following actions for municipal wastewater utilities in response to COVID-19:

- **Protection of Personnel:** A utility's personnel is an essential part of the operation of an effective utility. During this outbreak, utilities should:
  - Encourage sick personnel to stay home and seek professional care when appropriate
  - Encourage good hygiene by ensuring access to antibacterial disinfectants such as wipes, soaps, and hand sanitizers
  - Ensure proper disinfection of high use areas and surfaces
- **Protection of Customers:** Utilities interact with their customers almost daily. To help prevent the spread within a utility's customer base utilities can:
  - Promote the use of online or telephonic payments and/or communications where available
  - Encourage customers and personnel to use a damp cloth to seal mailings
  - Provide drop-box payment locations to limit in-person interactions

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- **Wastewater Treatment Facility Operation:** To ensure that COVID-19 is not spread through untreated wastewater discharges, utilities should:
    - Ensure continued compliance with all National Pollutant Discharge Elimination System (“NPDES”) permits and related disinfection requirements
    - Regularly check chlorine disinfection units to ensure the proper dosage is being deployed for treatment
  - **Protection of Field Personnel:** A utility’s field personnel are often on the frontlines of dealing with outbreaks. To ensure the protection of field personnel, utilities can:
    - Promote personnel to stay home if sick so as not to transmit to the general public or other personnel through field operations
    - Encourage personnel to limit interaction with customers and others during field operations unless necessary. If communication is required, attempt contacting customers and others via telephone or electronic communication if time is not of the essence
    - While the Water Environment Federation has stated that no COVID-19-specific protections are currently being recommended for those involved in wastewater management operations, including those at wastewater treatment facilities, should a need arise for personnel to handle untreated wastewater, proper precautions should be taken including the use of appropriate protective outdoor, gloves, boots, goggles, or face shield masks.
  - **Communication with Customers and Local Leaders:** During outbreaks such as this, utilities should be in regular communication with both its customers and local leaders to ensure that accurate and timely updates are being provided as to any interruption or planned changes to a utility’s standard operation.
  - **Emergency Plan:** Utilities should draft, review, and/or revise emergency plans to ensure proper response to emergencies arising during events or outbreaks such as COVID-19. Plan’s may include:
    - Procedures for operating the treatment plant during state or local quarantine periods
    - Procedures for operating the treatment plant with limited personnel or resources
    - Procedures for notifying customers and other appropriate agencies/individuals of changes to the utility’s standard operating procedures;
    - Chain-of-command and emergency contacts during emergencies, etc.
  - **Crisis Communication Plan:** During outbreaks such as COVID-19 fear and panic amongst the public is likely to occur, and utilities should develop a crisis communication plan designed to inform its customers and other citizens of the steps it is taking to ensure the continued protection of the public as a result of its wastewater treatment operations. General managers should work with their personnel and outside consultants to develop a crisis communication

plan that can be deployed immediately.

While municipal wastewater utilities are not at the epicenter of the COVID-19 outbreak, utility personnel and customers are, and utilities should act now to help prevent the spread of this virus and ensure the public that the utility is taking appropriate steps in light of this worldwide pandemic.

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