



March 27, 2020

Dear hazardous waste and used oil handlers,

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 customers and communities. You may have questions regarding how to handle various situations, and we will try to address as many of those as we can. The situation is changing rapidly, and we will do our best to keep you as informed as possible. We are also committed to working with regulated entities to provide flexibility where possible.

How should hazardous waste generators, transporters, and treatment, storage, and disposal facilities (TSDFs) respond to COVID-19?

- Use best practices for worker safety, including engineering and administrative controls and personal protective equipment. More information is available at <https://www.osha.gov/SLTC/covid-19/>.
- Plan for possible shortages of personnel or supplies. Identify key personnel and backups.
- Ensure staff is appropriately trained on emergency procedures and applicable contingency plans.
- Contact local emergency management organizations as needed.
- Communicate with customers regarding potential concerns or impacts that may occur.

What is DEQ doing?

- DEQ participates in the state-level emergency response, as directed by the Idaho Office of Emergency Management.
- DEQ compliance officers and permit writers are available via phone or email to provide technical assistance.
- DEQ created a COVID-19 response page and is updating the website regularly (<https://www.deq.idaho.gov/assistance-resources/covid-19-response/>).
- DEQ is evaluating the inspections schedule. If your facility has an inspection this year, DEQ will work with you to ensure it does not impose an undue burden.

What should hazardous waste generators, transporters, and TSDFs do to maintain compliance?

- Continue to follow all applicable hazardous waste regulations and permit requirements to the best of your ability.
- If compliance is not reasonably practicable, handlers should do the following:
 - Act responsibly under the circumstances in order to minimize the effects and duration of any noncompliance caused by COVID-19;
 - Document the specific nature and dates of the noncompliance;
 - Document how COVID-19 was the cause of the noncompliance, and the decisions and actions taken in response, including best efforts to comply and steps taken to come into compliance at the earliest opportunity; and
 - Return to compliance as soon as possible.
- Consult your regional office compliance officer or state office permit officer if you have special circumstances or issues that would affect your ability to maintain compliance.
- Generators should communicate with transporters and disposal facilities to determine if hazardous waste management will be impacted. Notify DEQ as soon as possible if any changes will cause you to be out of compliance.

- Transporters and disposal facilities should communicate operation changes that will impact customers.
- Used oil handlers should also follow the guidelines in this letter.
- Hazardous waste and used oil transportation are considered essential services. Transporters can find up-to-date information on essential services at <https://trucking.org/COVID19>.
- DEQ will work with you to evaluate situations on a case-by-case basis and use enforcement discretion where applicable.

This letter provides a shared understanding of priorities during this emergency but is not authorization to violate statutes, rules, or permits. Contact us if you have questions or concerns about hazardous waste compliance.

The State of Idaho's COVID-19 website provides up-to-date information (<https://coronavirus.idaho.gov>).

For additional information, visit www.deq.idaho.gov, contact your DEQ regional office, or call the Hazardous Waste Bureau at (208) 373-0502.

Boise Regional Office	(208) 373-0550
Coeur d'Alene Regional Office	(208) 769-1422
Idaho Falls Regional Office	(208) 528-2650
Lewiston Regional Office	(208) 799-4370
Pocatello Regional Office	(208) 236-6160
Twin Falls Regional Office	(208) 730-2190

Sincerely,



Natalie Creed
Hazardous Waste Bureau Chief