



March 23, 2020

Dear drinking water 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. 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 and keep you informed. We are also committed to using whatever discretion and flexibility we have to appropriately deal with situations as they arise.

How water systems should currently respond to COVID-19:

- Use best practices for worker safety, including engineering and administrative controls, and appropriate personal protective equipment (PPE). Sample containers handled by customers, writing utensils, and paper may be a source of contamination. More information is available at <https://www.osha.gov/Publications/OSHA3989.pdf>.
 - ✓ Postpone any non-time-sensitive sampling and conduct no-contact sampling when possible.
 - ✓ Wash hands frequently and avoid touching your face.
 - ✓ Maintain recommended distances of six feet from all people and avoid contact with symptomatic or infected individuals;
 - ✓ Avoid entry into hospitals and senior/long-term care facilities when possible.
 - ✓ If it is necessary to enter a facility, ask customers COVID-19 screening questions in advance. If the answers do not indicate illness or exposure, utilize regular PPE, including disposable gloves. If the answers do indicate illness or exposure, assess the need to enter the building with a priority of identifying an alternative location if possible. If access to an exposed site is necessary, you should utilize PPE consisting of a Tyvek suit, respiratory protection, disposable gloves, and goggles. After exiting an exposed site, all PPE should be removed and placed in a sealed garbage bag before entering your vehicle and wash hands or use an alcohol-based sanitizer.
- Stay in contact with your local emergency management organization (city or county level) and local health district.
- If possible, provide information to your community about potential concerns or impacts that may occur.
- To assess your preparedness, consider the following:
 - ✓ *Staffing*—Assign a backup operator. Identify at least one additional properly licensed individual who can be trained to operate your system, or seek a contract operator. Access a list of contract operators from our public water system switchboard at <https://www.deq.idaho.gov/water-quality/drinking-water/pws-switchboard/>.
 - ✓ *Access*—Ensure backup staff has keys, lock codes, and the ability to access important areas such as pump-houses. Provide outreach to your distribution and tap sample locations to ensure precautionary measures are taken by both the operator and property owners to limit potential exposure.
 - ✓ *Plans and Manuals*—Review and update your Emergency Response Plans and Operations and Maintenance Manuals.
 - ✓ *Essential Treatment Chemicals and Equipment*—Review your inventory of essential treatment chemicals and equipment. Identify backup chemical and treatment equipment suppliers.
 - ✓ *Laboratory Testing and Courier Services*—Identify a backup lab that is properly certified to meet your testing needs and a backup courier, if used. Access Idaho's certified laboratory list from our [public water system switchboard](#).
 - ✓ *Notifications*—Evaluate how Tier 1 and 2 public notifications will be delivered to your customers within the required timeframes. Access public notification templates from our [public water system switchboard](#).

What DEQ is doing:

- DEQ participates in the state-level emergency response as directed by the Idaho Office of Emergency Management.
- DEQ compliance officers are available via phone or email to provide technical assistance.
- If your facility is scheduled for an inspection this year, we will work with you to ensure the inspection does not impose an undue burden during this event.

What to do about required sampling and reporting:

- There is no legal mechanism to suspend drinking water testing and reporting requirements. Operators are expected to conduct sampling and monitoring if it is safe to do so along with associated reporting. The Drinking Water Bureau will evaluate situations and use enforcement discretion as applicable.
- Consult with your DEQ or health district compliance officer for special circumstances or issues that would affect your system's compliance.
- If you cannot collect a sample or if the lab cannot analyze the sample, notify your DEQ or health district compliance officer about the circumstances leading to the missed sample or analyses.
- If you become aware of an event that requires 24-hour public notification, conduct the public notification, and notify your DEQ or health district compliance officer immediately. Public notification is critical to protecting public health. Let DEQ know how we can assist you with the notification.
- If routine distribution or tap sampling locations are unavailable due to COVID-19, samples may be taken at an alternative location in the distribution system or alternative tap sites, following the conditions described below.

What to do if a sampling location is closed or not accessible for monitoring:

Total coliform and disinfection residual monitoring

- Identify an alternative sampling location, preferably within five service connections of the routine sampling site, most representative of the water quality at the unavailable routine location. An alternative location can include an outside tap or other location that is of lower contact/exposure risk. *At alternative locations, use extra care during tap cleaning and flushing before sampling.*
- Samples must still be representative of the distribution system and collected at the same frequency that they would otherwise be collected.
- If using chlorine in your system, the chlorine residual must be taken at the same time and place as all distribution system samples and reported on the lab form as usual. It is critical for systems providing 4-log inactivation of viruses to maintain the required contact time and chlorine residual.
- On the lab form, identify the alternative location by noting "Alternative" next to the location information.
- Repeat and source samples (if a ground water-designated system) are still required within 24 hours; however, if you have difficulty with this requirement, work with your DEQ or health district compliance officer.

Monitoring under the Lead and Copper Rule:

- Alternative tap sampling locations must be from another site in the sampling pool and, if possible, within the same tier priority (i.e., Tier 1, 2, or 3). If a site with the same tier priority is not available, select the site from the next lowest tier. An alternative location must be from a cold water kitchen or bathroom sink tap.
- The alternative location must be within reasonable proximity of the original site, if possible. On the lab form, identify the alternative location by noting "Alternative" next to the location information.

This sampling location flexibility is for a limited duration; DEQ will notify you when this flexibility is no longer available.

Helpful resources:

- Idaho Water and Wastewater Agency Response Network (IdWARN) at www.idwarn.org. IdWARN is a mutual aid program on stand-by to help you find qualified personnel, equipment or supplies for your water system. Contact IdWARN at (208) 789-0120 and email at idahowarn@gmail.com.
- State Communications Center: (800) 632-8000 or (208) 846-7610; both numbers activate Idaho's Emergency Response Network
- COVID-19 and Drinking Water—<https://www.deq.idaho.gov/water-quality/drinking-water/covid-19-and-drinking-water/>

We appreciate your commitment to providing safe and reliable drinking water to the citizens of Idaho and protecting public health. Contact your compliance officer if you have questions or concerns about maintaining your facility's compliance with the Idaho Rules for Public Drinking Water Systems.

Sincerely,



Jerri Henry, Administrator
Drinking Water Protection and Finance Division