

# Water and COVID-19

*This page will be updated as new questions and information become available*



## Water and COVID-19 Frequently Asked Questions

- **Where can I go for up-to-date information about COVID-19 and water?**

The EPA has a new [COVID-19 page](#) and the Center for Disease Control also has a [webpage](#) with information. This FAQ summarizes some of this information.

- **Can COVID-19 be transmitted through water or wastewater?**

According to the [Centers for Disease Control and Prevention](#) (CDC), “coronaviruses are susceptible to the same disinfection conditions in community and healthcare settings as other viruses, so current disinfection conditions in wastewater treatment facilities are expected to be sufficient. This includes conditions for practices such as oxidation with hypochlorite (i.e., chlorine bleach) and peracetic acid, as well as inactivation using UV irradiation.” You can find the CDC’s page on COVID-19 and municipal water [here](#).

- **Should wastewater workers be doing anything differently to keep themselves safe on the job?**

[According to the CDC](#) and Occupational Safety and Health Administration (OSHA), there is no evidence that wastewater workers need to take additional precautions. Workers should follow [routine practices to prevent exposure to wastewater](#), including using the engineering and administrative controls, safe work practices, and personal protective equipment normally required for work tasks when handling untreated wastewater.

- **What do we do if we experience chemical shortages? If we can’t find bleach?**

If we become aware of specific shortages or issues commonly facing water and wastewater systems, we will keep both the CoWARN network and this fact sheet updated.

During all kinds of resource shortages, whether of supplies or labor, utilities should utilize the [CoWARN network](#). CoWARN is an organization that facilitates mutual aid and resource sharing between water and wastewater utilities, and it is free to join. Once a utility has signed the mutual aid agreement and becomes a member, they can “activate CoWARN” which will send out an email to all 162 CoWARN



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members with a request for help. Members will then respond if they are able to offer assistance. Often it is easy, quick, and inexpensive to get equipment and personnel help from a neighboring utility.

- **What kinds of operational impacts should we expect from a pandemic situation? What can we do to be prepared?**

All public water systems should plan for continuity of operations during a pandemic or any other type of emergency (e.g., flooding or forest fires). During a severe pandemic, the most serious expected challenge for public water systems would be absenteeism from employees who are sick, who are taking care of others, or who must stay home for other reasons. Planning for staffing shortages – both at your plant and at businesses you rely on – is one of the most critical things you can do to ensure continuity of operations.

- **What can we do if we experience labor shortages?**

It is good for organizations to have a formal labor shortage plan detailing how they will remain in operation if a substantial portion of the workforce is unavailable. These plans should include procedures for augmenting staff as needed due to incapacitation or loss of available workforce. Also, mutual aid may be available through CoWARN, so it is important to make sure you are a member. Please see the Water Information Sharing and Analysis Center's [Business Continuity Planning for Water Utilities](#) guidance document for more information on continuity planning.

- **Are public utilities still expected to follow their sampling schedules during an emergency? What adjustments are we allowed to make to keep our workers safe?**

During an emergency, we still expect utilities to take chlorine and bacteria samples from representative locations within the distribution system. They may have to get samples from outside spigots, hydrants, etc. to avoid going into people's homes, but to not sample distribution could create another health risk to the public.

It may be a good idea to identify alternative locations now so that you would be ready to use them in an emergency

- **Are public utilities expected to uphold the routine maintenance of system facilities (for example, tank cleaning) during an emergency?**

We encourage water systems to continue doing regularly scheduled maintenance, including tank cleaning. According to the Centers for Disease Control and Prevention (CDC), "coronaviruses are susceptible to the same disinfection conditions in community and healthcare settings as other viruses, so current disinfection conditions in wastewater treatment facilities are expected to be sufficient. This includes conditions for practices such as oxidation with hypochlorite (i.e., chlorine bleach) and peracetic acid, as well as inactivation using UV irradiation." This means that it is important to keep up with routine maintenance, especially when it includes disinfection.



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- **Can COVID-19 spread through swimming pools? Is there anything we need to do to keep pool users and workers safe?**

According to the [Centers for Disease Control and Prevention](#) (CDC), “There is no evidence that COVID-19 can be spread to humans through the use of pools and hot tubs. Proper operation, maintenance, and disinfection (e.g., with chlorine and bromine) of pools and hot tubs should remove or inactivate the virus that causes COVID-19.”

- **Is there a water test for COVID-19?**

There is no specific test for COVID-19 in water at present. However, common disinfection treatment techniques are expected to be effective for COVID-19.

- **Can the state help with public and risk communication in the event of a boil water order or large spill?**

During an emergency such as a spill or specific event at a utility (e.g., line break, sewer overflow, flood), we still expect utilities to manage the public information function for their district. This may include issuing emergency boil water advisories that require 24-hour public notice (i.e., tier 1 public notice) to all of a system’s customers. The department will always provide assistance with drafting and reviewing the required public notice. We have an easy-to-use public notice generator available at [www.colorado.gov/pacific/cdphe/pnrule](http://www.colorado.gov/pacific/cdphe/pnrule) (use the “Create public notice” link). Additionally, in addition to direct delivery requirements, press releases and other social media outlets (e.g., Facebook, Next Door, etc.) have been an effective way to reach consumers in a relatively short amount of time. If you are unable to meet the direct delivery requirements (e.g., due to accessibility issues), please contact the department immediately at 1-877-518-5608.

For sanitary sewer overflows, the district should implement methods to cleanup and mitigate the sewer overflow that are standard for sewage overflows (e.g., collect ponded sewage, disinfect area, restrict public access). For example, disinfection with chlorine should remove or inactivate the virus that causes COVID-19. The CDC has indicated wastewater treatment plant operations should ensure workers follow routine practices to prevent exposure to wastewater. These include using engineering and administrative controls, safe work practices, and personal protection equipment normally required for work tasks when handling untreated wastewater. No additional COVID-19-specific protections are recommended for employees involved in wastewater management operations, including those at wastewater treatment facilities. More information is available at: [www.cdc.gov/coronavirus/2019-ncov/php/water.html](http://www.cdc.gov/coronavirus/2019-ncov/php/water.html) and [www.wef.org/coronavirus](http://www.wef.org/coronavirus).

For public information officers working districts, we highly recommend coordinating with your local public health agency public information officers. The department is continually updating website resources regarding health issues related to COVID-19. This information can be found online at [www.colorado.gov/pacific/cdphe/2019-novel-coronavirus](http://www.colorado.gov/pacific/cdphe/2019-novel-coronavirus).



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- **What can drinking water systems do when faced with challenges accessing needed sample sites? Are we still expected to follow our regular sampling schedules during an emergency?**

During an emergency, we still expect utilities to take drinking water samples, such as chlorine and bacteria samples, from the required sampling locations. To not sample appropriately could create another health risk to the public. It is a good idea to identify alternative locations now so that you would be ready to use them in an emergency.

The department realizes that accessibility during an emergency may be limited, however public health still needs to be protected. Specifically,

For total coliform sampling, systems may have to collect samples from outside spigots, hydrants, etc. to avoid going into people's homes. We highly encourage systems to review their current total coliform sample siting plan to make sure it is up-to-date and includes readily accessible sampling sites that are representative of distribution system water quality. Please contact your compliance specialist and we can help you with updating your plan.

For disinfection byproduct sampling, many of our regulated systems are on reduced monitoring (i.e., annual monitoring). Please visit your online monitoring schedule at [www.wgcdcompliance.com/schedules](http://www.wgcdcompliance.com/schedules). We highly encourage systems to collect their disinfection byproduct samples early in the monitoring period. This allows ample time to both collect and analyze the samples. If you have accessibility issues, please contact the department. We will work with your system to identify other possible monitoring sites that meet the regulatory requirements (e.g., are within five sample sites of the original location).

For lead and copper monitoring, approximately 75% of our public water systems are on annual monitoring (i.e., required to sample for lead and copper June through September). Again, we highly encourage systems to collect their samples early in the monitoring period. If a sample site is unavailable, you may collect a sample at another site in your sampling pool (that meets the tiering requirements). Please contact your compliance specialist if you need assistance with identifying additional sample sites.

Please be aware that the department is not waiving any drinking water regulatory requirements because we must ensure public health is protected through their drinking water. All monitoring and reporting requirements still apply and any violations will continue to be issued. It is important that the public be made aware of drinking water problems via the public notice rule as required by both the federal Safe Drinking Water Act and Colorado Primary Drinking Water Regulations.

If there are any accessibility issues with any of your treatment or distribution system samples, please contact your system's drinking water [compliance specialist](#) or contact us at 303.692.3556.



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- **Can public drinking water systems collect all of their total coliform samples on the same day or collect all of the samples during the first week of the month?**

The drinking water regulations require that public water systems collect their total coliform samples at *regular time intervals throughout the month*. The purpose of this requirement is to assess the safety of the drinking water throughout the monitoring period. Only groundwater systems that serve less than or equal to ( $\leq$ ) 4,900 people are allowed to collect all of their samples on a single day. In Colorado, approximately 85% of our regulated systems are only required to collect one total coliform sample per month (since they serve less than or equal to ( $\leq$ ) 1,000 people). We always recommend that these smaller systems sample early in the month and follow their total coliform sample siting plan.

For larger systems that are required to sample at routine intervals, the department requires that systems collect samples in accordance with their total coliform sample siting plan. These systems can still collect samples early in the sampling interval - for example on the 24th of the month instead of the 30th of the month for a fourth week sample interval.

Population Served Range (people)	Recommended Sampling Intervals
1,001 - 4,900	Sample twice a month at regular intervals, unless the system is a groundwater system that serves less than or equal to ( $\leq$ ) 4,900 people
4,901 - 12,900	Sample twice a month at regular intervals
12,901 - 17,200	Sample three times a month at regular intervals
17,201 - 25,000	Sample four times a month at regular intervals
25,001 or more	Samples collected at regular intervals throughout the month

- **What adjustments are we allowed to make to keep our workers safe?**

Employee safety is always a high priority. If you are unable to maintain your treatment or collect your required samples (for either drinking water or wastewater) due to staff safety concerns, please notify the department immediately. We can help you to try and maintain compliance. However, violations will still need to be issued and public notice implemented, as required.

- **Can essential water/wastewater treatment personnel be prioritized for COVID-19 testing or screening? Some utilities would like to "quarantine" healthy individuals at their treatment plants to assure that drinking water and sewage treatment facilities can function during this crisis.**

The state has expanded its testing criteria to align with the CDC. You can find the current testing criteria [here](#) as well as information on if, and how, the state will prioritize tests. This information on this webpage changes frequently so we encourage you to look often at this webpage, and our main website,

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[www.colorado.gov/pacific/cdphe/2019-novel-coronavirus](http://www.colorado.gov/pacific/cdphe/2019-novel-coronavirus). Currently, these criteria do not allow for testing apparently healthy workers to confirm they do not have COVID-19.

- **When a COVID-19 vaccine becomes available, can essential water/wastewater treatment personnel be prioritized for vaccination?**

The state does not have any information available yet on who would be prioritized for vaccination, once a vaccine becomes available.

- **How should dischargers complete their Discharge Monitoring Reports (DMRs) if staff are unable to sample or if they cannot get results back from the laboratory?**

A permittee that temporarily can not collect or analyze samples as required by their permit should still submit the required DMRs, but complete the following steps at the time of DMR submittal:

If your facility submits paper DMRs, please complete the DMR to the best of your ability and write “Pandemic Incident” on the DMR.

If your facility participates in electronic reporting via NetDMR, enter a no data indicator (NODI) code into the required field(s). Options are:

- NODI code “E” (analysis not conducted/ no sample)- this will be the appropriate NODI code in most scenarios. It will trigger NetDMR to flag a “violation.” You will need to validate the violation to submit the DMR. Include a cover letter or comment on DMR with an explanation. If appropriate, the division will administratively resolve the violation and it won’t be considered as part of your facility’s compliance record.
- NODI code “2” (operation shutdown) - this should only be used in extreme situations.

If monitoring is able to be conducted during part, but not all, of the monitoring period, report any collected data on the DMR (or enter in NetDMR) and specifically note the actual frequency that the discharge was monitored. Include a cover letter or comment on the DMR with an explanation.

In some instances, permittees may be constricted to utilizing non-EPA approved methods for sampling and analysis. In this case, report any relevant data on the DMR and include a cover letter or comment that identifies the specific methodology associated with the monitoring.

In all cases, please submit a cover letter with the DMR that includes a brief explanation of how conditions beyond the reasonable control of the permittee resulted in the monitoring and reporting requirements not being met. To the extent feasible, provide any information to support that the facility was being properly maintained at the time and was expected to be meeting effluent limits (e.g., contemporaneous operating logs, or other relevant evidence, that the facility. Also, identify the permittee’s plan to complete the monitoring and reporting requirement as soon as possible.

Any monitoring requirements that can not be met by the deadlines in a permit should still be completed at and reported to the division when conditions allow.