ODW Program Guidance During COVID-19

May 15, 2020

From: Dwayne Roadcap, Director, Office of Drinking Water (ODW)

To: ODW staff

Document History Log

<table>
<thead>
<tr>
<th>History</th>
<th>Date</th>
<th>Description</th>
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<tbody>
<tr>
<td>Issued</td>
<td>April 1, 2020</td>
<td>Initial Program Guidance</td>
</tr>
<tr>
<td>1st Revision</td>
<td>May 1, 2020</td>
<td>Added link to Virginia Department of Health guidance on COVID-19 (page 1). Updated the “Monitoring and Reporting Requirements” beginning on page 2. Edits direct staff about data entry into the Safe Drinking Water Information System (SDWIS). No other changes made; no impact to the regulated community.</td>
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<tr>
<td>2nd Revision</td>
<td>May 15, 2020</td>
<td>Removed temporary suspension of field activities; ended the temporary, enhanced tele-survey process. Routine fieldwork can begin as specified in Appendix - 1A and - 1B. Added contact information for the non-community sustainability coordinator and made other edits in the customer service section. Added more detail on inactivating a permit. Made multiple formatting changes. Added Appendix - 1C. Regulated activities do not change.</td>
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Drinking water is essential during the coronavirus pandemic. Public water systems (“waterworks”) have a heightened responsibility to protect public health and help prevent the spread of COVID-19, the disease caused by the coronavirus. Unsafe drinking water can lead to serious illnesses. Citizens need drinking water for life and other critical needs, such as handwashing during the pandemic. Waterworks owners and operators must continue normal operation and maintenance to the extent possible to ensure required sampling and safety of drinking water supplies.

The well-being of our employees, stakeholders, waterworks staff, and the public is our top priority while making sure drinking water is safe and complies with applicable laws and regulations. ODW will adhere to Governor Northam’s measures to combat COVID-19 and the Virginia Department of Health guidelines for Schools, Workplaces, and Community Locations.

ODW has returned to performing all routine fieldwork after evaluating exposure risk and the status of COVID-19 spread. See Appendix - 1A for ODW’s priorities, Appendix - 1B for procedures and best practices when performing fieldwork, and Appendix - 1C which has
guidelines for sanitizing a vehicle. When a routine, in-person inspection or sanitary survey is not possible because of a COVID-19 outbreak or risk at a specific waterworks, then ODW staff will provide technical assistance to the extent possible over the phone, teleconferencing, video-conferencing and other remote methods of communication. Only in rare and emergency situations will staff provide on-site, in-person assistance at a facility with a COVID-19 outbreak.

Customer Service and Office Hours:

Offices remain open. Customer service is a top priority. Staff can best receive and help customers who schedule an appointment in advance. Walk-in appointments may be limited or not possible to ensure physical distancing of 6-feet. Two field offices have limited access at this time (Culpeper and Southeast).

Staff are available at the usual contact numbers and by email; office and staff contact information is at http://www.vdh.virginia.gov/drinking-water/contact-us/.

For transient non-community and non-transient, non-community waterworks, Jarrett Talley, Non-community Sustainability Coordinator is a great resource. Staff and waterworks owners can contact Mr. Talley at Jarrett.Talley@vdh.virginia.gov or (804) 864-8085.

Staff has resumed construction and technical assistance site visits. In accordance with the Governor’s recommendations for easing restrictions, staff continue to work remotely when possible to maintain appropriate physical distancing. They do make limited and brief visits to the office to trade work that does not lend itself to off-site management.

All in-person training is postponed at this time. Staff is working on delivery of training via online technology to the extent possible. Outreach and marketing of these courses will continue using the same email and online platforms.

Monitoring and Reporting Requirements:

Staff must inform waterworks owners of the following as necessary when discussing program guidance:

- The field office must know when waterworks experience difficulties collecting, submitting, or reporting water quality data, or waterworks that suspend operations. Staff should remind waterworks to promptly and routinely communicate needs and challenges. If a waterworks cannot sample because of impacted operations related to the coronavirus pandemic, then staff will exercise enforcement discretion. See guidance from EPA dated March 26, 2020.

- If a waterworks has closed permanently, then staff will follow the procedures described below for inactivating the water system and invalidating the operation permit.
ODW has authority pursuant to Va. Code § 32.1-173 B to invalidate a permit. If a waterworks owner believes that the water system no longer meets the definition of a waterworks, staff must have sufficient documentation before ending oversight and monitoring.

Field office staff will perform a site visit to confirm information provided by the owner, unless another state agency provides field confirmation. Field office staff will contact the local health department, the local building/zoning official, or other state agency (e.g., Virginia Department of Education, Department of Agriculture and Consumer Services, or Department of Social Services) as appropriate to determine whether other regulating partners have conflicting information. When the Field Director concurs the water system does not meet the definition of a waterworks, then the Field Director will email a summary and documentation to the Division of Technical Services. If the Field Services Engineer and Division Director concur with the Field Director’s assessment, then they will forward a recommendation to the Office Director. If the Office Director concurs, then the Field Director can invalidate the permit and notify the water system owner.

- If a waterworks closes temporarily or is operating at diminished capacity, ODW will continue to regulate the water system as a waterworks. ODW will exercise appropriate enforcement discretion for violations such as missed sampling events that are related to the coronavirus pandemic.

- When staff determine that a waterworks is closed temporarily because of the coronavirus pandemic, staff will add a “COVD” water system indicator in SDWIS with a value of “YES”, and a Begin Date marking the start of the closure. For waterworks that are temporarily closed and an alleged violation of monitoring and sampling requirements results from the closure, staff will enter into SDWIS that the violation is “Rejected” with a Reason Code of “COVID.” Tableau queries can be used to find all waterworks with the COVD indicator of “YES”. Upon re-opening the waterworks and collecting startup samples, ODW expects regular monitoring to commence and for staff to annotate the re-open date as the End Date on the “COVD” indicator (changing the indicator to “NO”). Do not delete the COVD indicator.

- If a waterworks closed for an extended period of time due to the coronavirus or remained operational with limited or no water demand, but anticipates returning to more normalized flow, then staff should recommend flushing of the plumbing system before the waterworks resumes normalized flow. Staff may recommend special bacteriological sampling to verify the water quality is adequate.

- If a waterworks serves a seasonal facility that is opening for the season, then staff must discuss sampling requirements of the seasonal start-up plan with the waterworks operator and owner.
● If worker shortages and laboratory capacity problems develop, then compliance monitoring to protect against microbial pathogens is the highest priority. Additional priorities include nitrate/nitrite and lead and copper monitoring, followed by contaminants for which the waterworks has been non-compliant. Compliance monitoring for these parameters focuses on acute health risks.

● Waterworks owners should identify and use alternative laboratories to satisfy monitoring and reporting requirements. Contact labadmin@vdh.virginia.gov for any problem with compliance monitoring based on a closed laboratory with no adequate back-up lab available. Report monitoring or other compliance issues at labadmin@vdh.virginia.gov.
Beginning May 15, 2020, the Office of Drinking Water (ODW) will implement a prioritized approach to resuming routine field activities, which include sanitary surveys, site visits/inspections at construction projects, complaint investigations, and other on-site technical assistance activities. Table 1 summarizes the prioritization schedule.

Table 1. Prioritization schedule for resuming ODW field operation

<table>
<thead>
<tr>
<th>Level</th>
<th>Type of Waterworks</th>
<th>Action</th>
<th>Work Unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>Priority I</td>
<td>Community waterworks</td>
<td>Sanitary survey, technical assistance, inspection, complaint investigation</td>
<td>Field Offices</td>
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<tr>
<td></td>
<td></td>
<td>Final construction site visits and progress meetings</td>
<td>FCAP</td>
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<tr>
<td></td>
<td></td>
<td>Online training</td>
<td>TCDO</td>
</tr>
<tr>
<td></td>
<td></td>
<td>WBOP, asset management planning</td>
<td>TCDO</td>
</tr>
<tr>
<td>Priority II</td>
<td>Low and moderate exposure risk non community waterworks</td>
<td>Sanitary survey, technical assistance, inspection, complaint investigation</td>
<td>Field Offices</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Onsite training</td>
<td>TCDO</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Interim construction site visits and progress meetings</td>
<td>FCAP</td>
</tr>
<tr>
<td>Priority III</td>
<td>High &amp; very high exposure risk community and non-community waterworks</td>
<td>Sanitary survey, technical assistance, inspection, complaint investigation</td>
<td>Field Offices</td>
</tr>
</tbody>
</table>

ODW’s first priority will be to complete field visits at community waterworks that staff postponed from mid-March to mid-May due to concerns about exposure to COVID-19, the disease caused by the novel coronavirus. Community waterworks are the primary water source for a significant percentage of Virginia’s population and serve the largest number of consumers. Staff will focus on completing the onsite portion of sanitary surveys at community waterworks, conducting site visits/inspections at construction projects, providing on-site technical assistance as required, and following up on complaint investigations. Staff may use tele-survey information to the extent possible.
ODW’s second priority is completing sanitary surveys, providing on-site technical assistance, and following up on complaint investigations at noncommunity waterworks that pose low to moderate risk of coronavirus exposure to ODW, waterworks owners/operators, and facility staff. These facilities may include schools, factories, restaurants, and other facilities that do not serve populations whose members have contracted COVID-19 or are at high risk for exposure to the coronavirus.

Community and noncommunity waterworks that pose a high risk or very high risk of exposure to coronavirus or serve an at-risk community, such as a waterworks that serves an adult care facility for senior citizens, will be in the third priority. For waterworks with an active COVID-19 outbreak, staff should continue to communicate with owners and operators remotely (via phone, webinar, video conference, etc.).

ODW will modify procedures to ensure implementation of CDC recommendations, state and agency leadership direction, and the Governor’s restrictions on work, travel, and/or social interaction in response to the coronavirus. Staff will receive personal protective equipment (PPE) and guidelines for conducting field activities in a safe manner. For more detailed instructions, please see Appendix - 1B, “BMPs for conducting routine field work.”

Division directors and field office directors may establish priorities for individual waterworks within the broader guidelines. Case-by-case changes of priorities in Table 1 should consider and balance potential public health risks, health risks from delaying field activity at a particular waterworks, staff safety concerns, available staff resources, individual staff needs or concerns, availability of PPE, location of coronavirus outbreaks, and other considerations.

The sanitary survey prioritization of noncommunity and certain community waterworks as Priority II or Priority III considers the level of exposure risk depending on the risks posed by the waterworks. These steps identify the exposure risk associated with field work at noncommunity and certain community waterworks:

- **STEP 1** – Determine the waterworks service population and type.
- **STEP 2** - Categorize the waterworks on the exposure risk category using Table 2 below.
- **STEP 3** – Follow the BMP for scheduling and conducting field work, Appendix - 1B.

**Table 2 – Exposure Risk Evaluation**

<table>
<thead>
<tr>
<th>Examples</th>
<th>Type</th>
<th>Exposure Risk Categories</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Low</td>
</tr>
<tr>
<td>Water Treatment Plants</td>
<td>Community</td>
<td>X</td>
</tr>
<tr>
<td>Groundwater</td>
<td>Community</td>
<td>X</td>
</tr>
<tr>
<td>Consecutives</td>
<td>Community</td>
<td>X</td>
</tr>
<tr>
<td>Mobile Home Parks</td>
<td>Community</td>
<td>X</td>
</tr>
<tr>
<td>Examples</td>
<td>Type</td>
<td>Exposure Risk Categories</td>
</tr>
<tr>
<td>--------------------------------</td>
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<td>--------------------------</td>
</tr>
<tr>
<td>Prisons, Healthcare Facilities</td>
<td>Community</td>
<td>Low</td>
</tr>
<tr>
<td>Service Stations</td>
<td>TNC</td>
<td>X</td>
</tr>
<tr>
<td>Retailers</td>
<td>TNC</td>
<td>X</td>
</tr>
<tr>
<td>Restaurants</td>
<td>TNC</td>
<td>X</td>
</tr>
<tr>
<td>Country Clubs/Golf Courses</td>
<td>TNC²</td>
<td>X</td>
</tr>
<tr>
<td>Inns/Hotels/Motels</td>
<td>TNC</td>
<td>X</td>
</tr>
<tr>
<td>Campgrounds/Parks/Rec Areas</td>
<td>TNC²</td>
<td>X</td>
</tr>
<tr>
<td>Schools</td>
<td>NTNC</td>
<td>X</td>
</tr>
<tr>
<td>Daycares</td>
<td>NTNC</td>
<td>X</td>
</tr>
<tr>
<td>Manufacturing Plants³</td>
<td>NTNC</td>
<td>X</td>
</tr>
<tr>
<td>Mortuaries/Funeral Homes</td>
<td>TNC</td>
<td>X</td>
</tr>
</tbody>
</table>

¹Waterworks may also be classified as NTNC or TNC based on the number of persons that are “residents” and how long those persons stay at the facility served by the waterworks.

²Waterworks may be either TNC or NTNC.

³Some manufacturing plants that operate waterworks, such as poultry processing plants, have experienced outbreaks of COVID-19 and should be classified as high/very high risk.

Acronyms Used in Appendix - 1A:

- BMP: Best management practice
- CDC: Centers for Disease Control and Prevention, [https://www.cdc.gov/](https://www.cdc.gov/)
- FCAP: Financial and Construction Assistance Program
- ODW: Office of Drinking Water
- PPE: Personal protective equipment
- NTNC: Nontransient noncommunity waterworks
- TCDO: Division of Training, Capacity Development, and Outreach
- TNC: Transient noncommunity waterworks
- WBOP: Waterworks Business Operation Plan
Appendix - 1B
Best Management Practices (BMP) for Conducting Routine Field Work
May 15, 2020

This document represents best practices to schedule and conduct routine field work and may be updated to ensure consistency with state or agency guidelines. These BMPs do not represent an exhaustive list. Please review resources found on the VDH COVID-19 webpage for worker safety and other guidelines (https://www.vdh.virginia.gov/coronavirus/). Following the procedures outlined herein will minimize exposure to and limit the spread of the novel coronavirus. Each field office and division maintains autonomy on work assignments pursuant to Appendix - 1A. Continue to use a team approach to complete work and tasks.

If a staff member is not feeling well or suspects contact with someone confirmed with COVID-19, stay home and communicate with your supervisor for further instructions. If you feel sick or start to show symptoms of COVID 19, stay home or go home immediately and get proper medical care. Symptoms typically include fever, cough, and shortness of breath, but other symptoms may be present as well. Inform your supervisor, field office leadership, or division leadership team if you experience symptoms. Inform leadership of site visits conducted prior to showing symptoms. To minimize the waterworks’ and stakeholder’s exposure risks, do not perform any field work and notify your supervisor immediately when canceling fieldwork.

After assigned field work is scheduled, follow the steps below as applicable:

1. Call ahead to schedule and plan field work.
   a. Verify operational status and the ability to perform the work.
   b. Ask if there are worker protection control measures in place at the waterworks’ facilities such as special restrictions or requirements for personal protective equipment (PPE).
   c. Ask if the facility has had or is currently experiencing any potential or confirmed cases of COVID-19 or do they have workers quarantined due to exposures. If so, communicate with the field director or the division director to discuss postponing and rescheduling the activity.
   d. Determine who needs to be available for the field work and confirm that this person will be available.
   e. Explain what areas you will be looking at during the onsite visit and what areas you will discuss over the phone or via email.
   f. Schedule a day with the operator where there is the least interaction with non-operator staff or individuals, if possible.

2. Staff must prepare as much as possible before the site visit and only look at areas that are needed during the in-person site visit. To the extent possible, avoid entering administrative facilities while at the waterworks. Staff should make the site visit as brief as possible to limit exposure to both operator and staff.
   a. Complete required forms prior to the visit to help identify the onsite focus.
b. Limit onsite handling/review of paperwork - take pictures or ask that they scan and email documents to you.

3. Staff should limit the site visit to one ODW employee, but a maximum of two ODW employees is possible with concurrence from the field office or division’s leadership team. If two employees must attend the site visit, staff should arrange to travel in separate vehicles (personal vehicles or other methods), or check out or use a vehicle that will allow 6-feet of separation while riding together.

   a. Prior to and after the site visit, ensure the vehicle is disinfected per the guidance for vehicles.
   b. Always follow the operator vehicle instead of riding with the operator. This includes, but is not limited to, utility vehicles and golf carts.
   c. Under no circumstance should staff be in a group of 10 or more persons. If the operator appears to show symptoms similar to COVID-19, you should feel empowered to cancel the site visit and ask to reschedule.
   d. Do not handshake. Always maintain 6-feet of physical distancing.
   e. Conversations with operators should be conducted outdoors and with 6 feet distance to the extent possible. Use of cloth face coverings is recommended to help prevent the spread of the coronavirus and provide protection to yourself and others.
   f. Bring your own tools and equipment for use, avoid sharing equipment with the operator (pens, pencils, pocket colorimeter, flash light, etc.).

4. If possible, schedule multiple site visits in one day to maximize time in the field. Staff can likely accomplish more in one day by scheduling with one operator who operates four systems compared to the time constraints of scheduling four visits with four different operators who operate four different systems. Try to schedule field work to limit return to the ODW office until the next day.

5. Leadership recommends that staff wear nitrile or latex gloves when contacting high-traffic surfaces during the inspection (door handles, faucets, etc.).

   a. Make sure you understand how to properly use cloth face masks and gloves and how best to protect yourself (e.g., not touching your face without washing hands first). Guidelines from the Centers for Disease Control and Prevention are included with this Appendix.
   b. Use hand sanitizer liberally as you come into contact with surfaces.
   c. For less trafficked surfaces like piping, tanks, etc. where last contact was likely days ago, realize more time has likely elapsed for viral die off.
   d. Remove and dispose of gloves after the site visit and use hand sanitizer after removal.

6. Leadership recommends the use of cloth face masks during site visits to help prevent the spread of the coronavirus and provide protection to yourself and others, particularly when six feet physical distancing cannot be met. If available, face shields may also be an
alternative or an additional form of PPE. Face shields can be cleaned and disinfected. In general, cloth face coverings should:

a. Fit snugly but comfortably against the side of the face,
b. Be secured with ties or ear loops,
c. Include multiple layers of fabric,
d. Allow for breathing without restriction, and
e. Be able to be laundered and machine dried without damage or change to shape.

7. As much as possible, try and get any documents electronically versus paper copy.

a. If you receive a paper copy, it may be good to let it sit without contact for at least 24 hours to allow any virus to die from the surface

8. When going into well houses or other smaller enclosures, enter alone and ensure the door is open or ventilation is running to encourage air exchange.

9. If you need an operator to turn on a pump or piece of equipment, consider the following:

a. Ask the operator outdoors prior to entering the room, especially if the room will not allow 6-feet of physical distancing.
b. Have the operator enter the room and turn it on, exit the room, before staff enters.
c. Enter the room separately, make observations, exit the room.
d. Have the operator turn off equipment.
e. Discuss items observed outdoors.

10. Consider washing clothes worn during a sanitary survey on the warmest washer settings that are appropriate for the fabric and clothing.
How to Remove Gloves
To protect yourself, use the following steps to take off gloves

1. Grasp the outside of one glove at the wrist. Do not touch your bare skin.

2. Peel the glove away from your body, pulling it inside out.

3. Hold the glove you just removed in your gloved hand.

4. Peel off the second glove by putting your fingers inside the glove at the top of your wrist.

5. Turn the second glove inside out while pulling it away from your body, leaving the first glove inside the second.

6. Dispose of the gloves safely. Do not reuse the gloves.

7. Clean your hands immediately after removing gloves.
How to Wear Cloth Face Coverings

Cloth face coverings should—
• fit snugly but comfortably against the side of the face
• be secured with ties or ear loops
• include multiple layers of fabric
• allow for breathing without restriction
• be able to be laundered and machine dried without damage or change to shape

CDC on Homemade Cloth Face Coverings

CDC recommends wearing cloth face coverings in public settings where other social distancing measures are difficult to maintain (e.g., grocery stores and pharmacies), especially in areas of significant community-based transmission.

The cloth face coverings recommended are not surgical masks or N-95 respirators. Those are critical supplies that must continue to be reserved for healthcare workers and other medical first responders, as recommended by current CDC guidance.

Should cloth face coverings be washed or otherwise cleaned regularly? How regularly?
Yes. They should be routinely washed depending on the frequency of use.

How does one safely sterilize/clean a cloth face covering?
A washing machine should suffice in properly washing a cloth face covering.

How does one safely remove a used cloth face covering?
Individuals should be careful not to touch their eyes, nose, and mouth when removing their cloth face covering and wash hands immediately after removing.
Guidance for vehicle sanitation

May 15, 2020

The Office of Drinking Water (ODW) recommends the following to minimize the risk of exposure to the novel coronavirus from the use of a vehicle.

1. If possible, let the vehicle sit for 24 to 48 hours prior to next use. This allows some viruses on surfaces to die. Scheduling specific vehicle usage on staggered days, MWF or TuTh for example.

2. Limit your stops to those only absolutely necessary. Each time you make a stop, you are increasing your chances of exposure.

Before you leave:

1. Plan ahead for any food/drink needs you may have while in the field. Packing at home prior to your field visit will decrease your risk of exposure.

2. Make sure to bring any prescription or over the counter medication that you may need during your field visit.

3. Be prepared for pumping gas:
   a. The best practice is to use nitrile gloves while outside of the vehicle, especially when touching the pump handle and key pad.
      i. If nitrile gloves are not available, use a paper towel as a barrier between your hand and the pump handle and keypad.
   b. Once you have finished pumping gas, throw your gloves away before returning to your vehicle. Immediately after removal of gloves, wash hands with soap and water for at least 20 seconds or use an alcohol based hand sanitizer with at least 60% alcohol if soap and water are not available.

When disinfecting the vehicle:

It is advisable to wear nitrile gloves when cleaning and disinfecting the vehicle. They should be removed and disposed of after cleaning.

1. The vehicle should be cleaned upon return to the office by the staff person who used it that day. That person should immediately go home so they can clean the work uniform worn during their field exercise and vehicle disinfection. Their work clothes should be laundered using the warmest setting and dry items completely. Wash hands after handling dirty laundry.

2. Use a disinfecting wipe on hard surfaces, such as keys, door handles, steering wheel, dashboard, center console, cup holders, controls, and seat adjustment levers.
3. Use a disinfecting spray on the seat area only; make sure to spray two feet from the seat fabric and vent the vehicle for 10 minutes after.*

4. DO NOT use any wipes or spray on the electronic display.
   a. Clean electronic displays, by spraying a small amount of water and soap into a soft cloth and gently wiping areas with the cloth.

5. Immediately after removal of gloves, wash hands with soap and water for at least 20 seconds or use and alcohol based hand sanitizer with at least 60% alcohol if soap and water are not available.

Things to remember while disinfecting the vehicle:

1. Do not spray or wipe any sort of cleaner on switches, electronic devices or display screens, especially alcohol-based cleaners.

2. Do not use bleach-based sprays on fabric surfaces or carpet.

3. Do not use cleaning solvents, bleach or dye on vehicle’s seat belts, as these may weaken the belt webbing.

4. On vehicles equipped with seat-mounted airbags, do not use chemical solvents or strong detergents; such products could contaminate the side airbag system and affect the performance of the side airbag in a crash.

5. Do not use chemical solvents or strong detergents when cleaning the steering wheel or instrument panel to avoid contamination of the airbag system.

6. Do not use water or acidic cleaners (hot steam cleaners) on the seat as this can damage the seat or occupant classification sensor and can affect the operation of the air bag system, potentially resulting in serious personal injury.

*As of May, 15, 2020, ODW has requested, but not received, disinfecting spray for all of the field offices. Letting a vehicle sit for 24-48 hours between use allows some viruses on surfaces such as seats to die.

Guidelines for disinfecting a vehicle are based on the Department of General Services, Office of Fleet Management Services guidelines published March 12, 2020: https://dgs.virginia.gov/fleet/updates/announcements/