



STATE OF VERMONT
OFFICE OF LEGISLATIVE COUNCIL

MEMORANDUM

To: Senate Committee on Natural Resources and Energy
From: Michael O'Grady
Date: March 17, 2020
Subject: Environmental Issues Presented by COVID-19

Overview

You asked for an overview of environmental or natural resource issues or threats posed by the COVID-19 virus. I reviewed resources from the U.S. Environmental Protection Agency (EPA), the Center for Disease Control (CDC), the U.S. Department of Agriculture (USDA), and several industry publications. I also contacted Cathy Jamieson, DEC Solid Waste Program Manager; Bryan Redmond, DEC Drinking Water and Groundwater Protection Division Director, and Pete LaFlamme, DEC Watershed Division Director.

After review of the resources and the input from DEC, there appears to be few exigent environmental or natural resource issues posed by COVID-19, but there are some attendant issues that may arise. You also should be aware of the actions being taken or guidance issued with relation to certain environmental or natural resources concerns. This memorandum summarizes what I have learned according to subject matter.

Drinking Water and Groundwater

EPA has concluded that the risk to public drinking water supplies from COVID-19 is low.¹ EPA continues to recommend the use of public drinking water that has been properly disinfected. As all major public water supplies in Vermont are required to implement disinfection in compliance with the State Public Water Supply Rule and the federal Safe Drinking Water Act, public water supplies in Vermont should be adequately remediating any risk to the public.

Bryan Redmond at DEC agrees that the COVID-19 risk to the public from public water supplies is low. Nevertheless, the Drinking Water and Groundwater Division is continuing to monitor the guidance issued by EPA, CDC, the Association of Safe Drinking Water Administrators and the American Water Works Association for any updates. If guidance changes, I have asked DEC to notify me so that I can update you.

¹ See U.S. EPA, Coronavirus and Drinking Water and Wastewater, available at <https://www.epa.gov/coronavirus/coronavirus-and-drinking-water-and-wastewater>

DEC is also working with the Vermont Rural Water Association to distribute information to water system owners/operators for COVID 19 readiness and sustaining their operations. Bryan will send me a copy of the guidance when it is complete. I will send the guidance to you when I receive it.

DEC is facing some questions or issues with the response to COVID-19 and the operation or monitoring of public water supplies. Questions have arisen regarding the liability of a water system operator hired to help another system. What happens if there is a health risk from the system, is the on-loan operator liable? DEC is continuing to look at this issue and may request legislative input or remedy if determined necessary.

An additional issue is ongoing monitoring of public water systems. As buildings close and access is restricted, system operators are finding it difficult to access the locations for testing and monitoring. DEC will provide some flexibility with regard to timing of testing, but they will continue to require monitoring to protect the public health.

A renewal period for certification of large water system operators is approaching. DEC plans to extend the deadline for renewal as the schedule for training and classes has been significantly impacted by the virus outbreak and the guidance to avoid large gatherings. DEC is not requesting legislative action for the monitoring or renewal issues, but will contact the legislature if they believe legislative action is needed.

There is not significant information available regarding the risk of COVID-19 transmission from private wells. Some sources indicate that private wells have natural protections against viruses. EPA has advised that homeowners with private wells who are concerned about pathogens such as viruses in drinking water may consider approaches that remove bacteria, viruses, and other pathogens, including certified home treatment devices.²

Wastewater

EPA stated that the World Health Organization indicated that there is no evidence to date that COVID-19 has been transmitted through wastewater or sewage. Wastewater treatment plants permitted under the Clean Water Act, including those permitted in Vermont, do conduct disinfection to treat viruses in wastewater. COVID-19 is a type of virus that is particularly susceptible to disinfection.³ Continued standard treatment at wastewater systems in Vermont is expected to continue and address any risk to the public from the presence of COVID-19 in wastewater.

As many homes and businesses in Vermont are served by septic systems and not public wastewater systems, you may receive questions as to the efficacy of septic systems in treating COVID-19. EPA has stated that decentralized wastewater treatment (i.e., septic tanks) do not disinfect, but the Agency expects a properly managed septic system to treat COVID-19 the same way it safely manages other viruses often found in wastewater. Additionally, when properly installed, a septic system is located at a distance and location designed to avoid impacting a water supply well.⁴

² Id.

³ Id.

⁴ Id.

Solid Waste

Cathy Jamieson was on a webinar yesterday addressing the issue of the risk of COVID-19 transmission through solid waste management. According to Cathy and industry guidance, no special precautions to protect solid waste workers from COVID-19 are recommended when handling municipal solid waste.⁵ Continued use of those precautions already in place to protect solid waste workers from the hazards they already encounter, such as influenza, are sufficient to address the risks from COVID-19.

With regard to medical waste generated by the COVID-19 outbreak, hospitals and health care facilities managing the waste should follow the existing, regular procedures for category B medical waste, which would be similar to that for waste generated from influenza and other similar diseases. Medical waste must be placed in the appropriate red bag or container, and the medical waste transporter should ship it to a medical treatment facility, where it can be either autoclaved or incinerated.

Air Pollution

According to the CDC, the main pathway of concern for the coronavirus is inhalation/respiratory from being in close proximity to infected people. Air pollution can aggravate any virus, especially for vulnerable populations. I could not find any direct guidance on how persons at risk of contracting COVID-19 should avoid air pollution. I have found several publications that have determined that COVID-19 is actually leading to decreases in air pollution as large-scale emitters, especially in China, reduce operations.⁶

Wildlife and Other Animals

You may receive questions regarding the risk to wildlife or other animals from COVID-19. Although coronaviruses can be carried by animals and although COVID-19 originated in animals in China, CDC is stating that there has been no evidence that the virus is being carried by wildlife, livestock, or domestic pets.⁷ Guidance from the dairy industry similarly noted that there is no specific risk of transmission from livestock to workers, but that workers should take reasonable precautionary measures, such as washing hands and avoiding contact with the face, in order to stay healthy.⁸

⁵ See, Solid Waste Association of North America, Guidance on Coronavirus, available at https://swana.org/docs/default-source/advocacy-documents/guidance_on_coronavirus-2020_03_06.pdf?sfvrsn=fee6b88a_2

⁶ Energy & the Environment, NASA says COVID-19 lockdown 'slashes air pollution' in China, available at <https://www.energylivenews.com/2020/03/17/nasa-says-covid-19-lockdown-slashes-air-pollution-in-china/>

⁷ Center for Disease Control, Corona Virus 2019 (COVID-19), Frequently Asked Questions, COVID-19 and Animals, available at <https://www.cdc.gov/coronavirus/2019-ncov/faq.html#animals>

⁸ See Farm Journal, COVID-19 Fact Sheet for Dairy Workers Available in Spanish, English <https://www.agweb.com/article/covid-19-fact-sheet-dairy-workers-available-spanish-english>