



MARK PESTRELLA, CHAIR
MARGARET CLARK, VICE-CHAIR

LOS ANGELES COUNTY
SOLID WASTE MANAGEMENT COMMITTEE/
INTEGRATED WASTE MANAGEMENT TASK FORCE
900 SOUTH FREMONT AVENUE, ALHAMBRA, CALIFORNIA 91803-1331
P.O. BOX 1460, ALHAMBRA, CALIFORNIA 91802-1460
www.lacountyiswmtf.org

June 17, 2020

Dr. Barbara Ferrer
Los Angeles County Department of Public Health
313 North Figueroa Street, Room 801
Los Angeles, CA 90012

Dear Dr. Ferrer:

CONCERNS REGARDING COVID-19 CONTAMINATED SOLID WASTE AND POTENTIAL COMMUNITY HEALTH RISKS AT SUNSHINE CANYON AND OTHER MUNICIPAL SOLID WASTE LANDFILLS

The Los Angeles County Solid Waste Management Committee/Integrated Solid Waste Management Task Force (Task Force) would like to express its deep concern with the potential health risk to the workers and communities surrounding Sunshine Canyon and other major landfills due to the handling of COVID-19 contaminated solid waste. The Task Force respectfully requests that the County Department of Public Health (Public Health), as the Health Officer for the greater part of Los Angeles County, investigate the concerns expressed herein, evaluate potential health impacts, and implement measures to ensure the health, safety, and well-being of landfill workers and residents in the communities surrounding these landfills.

COVID-19 Impact on Solid Waste Disposal Quantities

The COVID-19 pandemic greatly impacted solid waste management activities. Solid waste generation from businesses dropped significantly due to the temporary closure of businesses such as retail stores, restaurants, sports and entertainment venues, and others. On the other hand, residential waste generation, such as food waste, increased significantly as people stayed home.

Many materials recovery and processing facilities stopped separating recyclables from the waste stream or temporarily closed to protect their workers and comply with physical distancing requirements. As these facilities closed, many waste haulers, already experiencing staff shortages due to the COVID-19 pandemic, were compelled to commingle trash and recyclable materials and take them directly to the landfill.

The stay-at-home orders recognized the need for landfills to continue operating without interruption, and so declared these facilities as an essential service.

Given the above conditions, several landfills anticipated increases in the daily disposal tonnages and requested the local enforcement agency (LEA) to grant emergency waivers to increase their maximum daily tonnage intake and hours of operation. Sunshine Canyon Landfill (SCL) was one of them. SCL requested and was granted an emergency waiver by the SCL LEA that, among other things, allowed an increase in its daily tonnage limit from 12,100 to 14,100 tons per day.

While the Task Force recognizes the SCL LEA's reasons for granting the emergency waivers, the Task Force is concerned that the waivers were granted without consultation with the neighboring communities or consideration of specific local conditions that could be exacerbated by the increased quantities of COVID-19 contaminated solid waste.

Solid Waste Handling at Landfills and Potential Risk to Neighboring Communities

There is still much that we do not know about COVID-19, such as the way it propagates, the conditions that cause it to mutate, how long it survives under various climatic conditions, the potential risk to humans when it becomes airborne, and the various pathways through which it can spread. Given this uncertainty, it is extremely important to evaluate the potential risk of spreading the virus through the various waste management and recycling activities.

This is of special concern to the communities surrounding SCL. These communities already suffer from their proximity to SCL, a major landfill, and the presence of adverse topographic and climatic conditions that make landfill odors a common daily occurrence. The presence of the COVID-19 virus in the solid waste, especially food waste, further exacerbates the problem and the risk to these communities.

According to guidance issued by the Federal Occupational Safety and Health Administration (OSHA) to Solid Waste and Wastewater Management Workers and Employers (<https://www.osha.gov/SLTC/covid-19/solid-waste-wastewater-mgmt.html>) refer to Enclosure 1), certain waste management activities carry **a very high risk of exposure**. These include shredding waste that **“could re-aerosolize potentially infectious SARS-CoV-2 [i.e., COVID-19] from environmental surfaces”** (emphasis added).

This could be happening at the working face at SCL and other landfills. Landfill operations tear through and compress thousands of trash bags and pierce through the alternative daily cover that was placed the night before, thereby exposing landfill workers. Common adverse wind conditions can also carry those emissions down the canyon into the community.

This situation is of great concern to the Task Force. Therefore, the Task Force respectfully requests that Public Health, as the Health Officer, investigate these concerns, evaluate potential health impacts to the community (such as by testing workers and residents on a regular basis and determining whether the virus can spread through the waste at landfills), and take appropriate measures to ensure the health, safety, and well-being of the residents in the communities surrounding SCL and other landfills.

SB 1383 Organic Waste Recycling Regulations and COVID-19

California is about to embark in a massive, unprecedented effort to recycle all its organic waste, with composting and mulching being the State's (California Department of Resources Recycling and Recovery, CalRecycle) preferred method of recycling. As required by the proposed CalRecycle SB 1383 organic waste recycling regulations (currently before the State Office of Administrative Law), every resident and business in every city and county will be required to recycle organic waste. Considering the incredibly rapid spread of COVID-19, its capacity to propagate, mutate, and survive under various adverse climatic conditions, the Task Force is very concerned that recycling and returning COVID-19 contaminated organic waste to the economic stream, for uses such as mulch or compost, may present a very high risk of exposure to infection.

Therefore, the Task Force also urges Public Health, as the Health Officer and the County agency responsible for protecting the health and safety of our communities, to investigate whether the virus can survive in the food waste and through the mulching/composting process, and to assess the potential risk of human exposure to the virus through the mulch and compost. These concerns should be investigated in consultation with other responsible agencies, such as the State Department of Food and Agriculture, California Department of Public Health, and CalRecycle, and appropriate measures to mitigate potential impacts developed. If necessary, a delay in the implementation of the SB 1383 (Chapter 395 of the 2016 state statutes) regulations should be pursued until this issue has been thoroughly assessed and mitigated.

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The Task Force would like to express its sincere appreciation to Public Health for its efforts in response to the current emergency and looks forward to your response. Should you have any questions regarding this matter, please contact Mr. Mike Mohajer, a member of the Task Force, at MikeMohajer@yahoo.com or at (909) 592-1147.

Sincerely,



Margaret Clark, Vice-Chair
Los Angeles County Solid Waste Management Committee/
Integrated Waste Management Task Force and
Mayor, City of Rosemead

MH:cso

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Enc.

cc: California Department of Public Health (Dr. Sonia Y. Angell)
California Environmental Protection Agency (Jared Blumenfeld)
California Department of Food and Agriculture (Karen Ross)
CalRecycle (Ken DaRosa, Mark de Bie, Matt Henigan)
Los Angeles County Department of Regional Planning (Maria Masis, Tim Stapleton,
Edgar De La Torre)
Los Angeles County Department of Public Health (Shikari Nakagawa-Ota,
Maurice Pantoja, Dorcas Hanson-Lugo)
Sunshine Canyon Landfill Local Enforcement Agency (Shikari Nakagawa-Ota,
Dorcas Hanson-Lugo, David Thompson)
Sunshine Canyon Landfill Technical Advisory Committee (Lisa Webber,
Jon Sanabria)
Sunshine Canyon Landfill Community Advisory Committee (Wayde Hunter)
Each Member of the Los Angeles County Solid Waste Management Committee/
Integrated Waste Management Task Force
Each Member of the Task Force Facility and Plan Review Subcommittee



Occupational Safety and Health Administration

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COVID-19 - Control and Prevention / Solid Waste and Wastewater Management Workers and Employers

COVID-19 Control and Prevention

Solid Waste and Wastewater Management Workers and Employers

This guidance is not a standard or regulation, and it creates no new legal obligations. It contains recommendations as well as descriptions of mandatory safety and health standards. The recommendations are advisory in nature, informational in content, and are intended to assist employers in providing a safe and healthful workplace. The Occupational Safety and Health Act requires employers to comply with safety and health standards and regulations promulgated by OSHA or by a state with an OSHA-approved state plan. In addition, the Act's General Duty Clause, Section 5(a)(1), requires employers to provide their employees with a workplace free from recognized hazards likely to cause death or serious physical harm.

This section provides guidance for solid waste and wastewater management workers and employers. This guidance supplements the general interim guidance for workers and employers of workers at increased risk of occupational exposure to SARS-CoV-2.

Employers should remain alert of changing outbreak conditions, including as they relate to community spread of the virus and testing availability, and implement infection prevention measures accordingly. As states or regions satisfy the gating criteria to progress through the phases of the guidelines for Opening up America Again, employers will likely be able to adapt this guidance to better suit evolving risk levels and necessary control measures in their workplaces.

Employers should assess the hazards to which their workers may be exposed; evaluate the risk of exposure; and select, implement, and ensure workers use controls to prevent exposure. The table below provides examples of waste management work tasks associated with the exposure risk levels in OSHA's occupational exposure risk pyramid, which may serve as a guide to employers in this sector.

Examples of waste management work tasks associated with exposure risk levels

| Lower (caution) | Medium | High | Very High |
|---|---|---|--|
| <ul style="list-style-type: none"> ▪ Handling municipal waste. ▪ Handling recyclable materials. ▪ Managing wastewater treatment systems. ▪ Performing maintenance tasks on equipment used to process municipal waste, recyclable materials, or wastewater. <p>Note: For activities in the lower (caution) risk category, OSHA's <i>Interim Guidance for Workers and Employers of Workers at Lower Risk of Exposure</i> may be most appropriate.</p> | <ul style="list-style-type: none"> ▪ Handling waste from healthcare facilities generated in the care of suspected or confirmed COVID-19 patients. <p><i>Note: The designation of medium risk for this task is consistent with occupational exposure risks for handling any routine medical waste—not just that of COVID-19 patients. Employers and workers should continue to use routine controls for this type of work task.</i></p> <ul style="list-style-type: none"> ▪ Performing maintenance tasks on equipment used to process medical waste. <p><i>Note: Again, employers and workers should continue to use routine controls for this type of work task.</i></p> | <ul style="list-style-type: none"> ▪ Category not applicable for most anticipated work tasks. <p>Note: Most solid waste and wastewater management work tasks are associated with no more than medium exposure risk; see the other columns of this chart.</p> | <ul style="list-style-type: none"> ▪ Category not applicable for most anticipated work tasks. <p>Note: Most solid waste and wastewater management work tasks are associated with no more than medium exposure risk; see the other columns of this chart. Avoid tasks that would place workers in this risk category, such as shredding waste, that could re-aerosolize potentially infectious SARS-CoV-2 from environmental surfaces.</p> |

Generally, management of waste that is suspected or known to contain or be contaminated with COVID-19 does not require special precautions beyond those already used to protect workers from the hazards they encounter during their routine job tasks in solid waste and wastewater management.

Some state, local, tribal and/or territorial health or environmental department(s) may have different or additional requirements for managing solid waste and wastewater.

Municipal Waste

Workers and employers should manage municipal (e.g., household, business) solid waste with potential or known SARS-CoV-2 contamination like any other non-

contaminated municipal waste.

Use typical engineering and administrative controls, safe work practices, and PPE, such as puncture-resistant gloves and face and eye protection, to prevent worker exposure to the waste streams (or types of wastes), including any contaminants in the materials, they manage. Such measures can help protect workers from sharps and other items that can cause injuries or exposures to infectious materials.

Medical Waste

For medical waste with potential or known COVID-19 contamination, manage like any other regulated medical waste. COVID-19 is not a Category A infectious substance.

Use typical engineering and administrative controls, safe work practices, and PPE, such as puncture-resistant gloves and face and eye protection, to prevent worker exposure to the waste streams (or types of wastes), including any contaminants in the materials, they manage. Such measures can help protect workers from sharps and other items that can cause injuries or exposures to infectious materials.

For regulated medical waste information, consult the regulated medical waste information in CDC’s Guidelines for Environmental Infection Control in Health-Care Facilities (2003). This document provides additional information related to the management of waste streams from hospitals and other healthcare facilities.

CDC also provides information on medical waste management as a Question and Answer page on its coronavirus website.

Recycling

As with municipal waste, employers and workers in the recycling industry should continue to use typical engineering and administrative controls, safe work practices, and PPE, such as puncture-resistant gloves and face and eye protection, to prevent worker exposure to recyclable materials they manage, including any contaminants in the materials.

Wastewater

Coronaviruses are susceptible to the same disinfection conditions in the healthcare setting 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 through the use of ultraviolet irradiation.

There is no evidence to suggest that additional, COVID-19-specific protections are needed for employees involved in wastewater management operations, including those at wastewater treatment facilities. Wastewater treatment plant operations should ensure workers follow routine practices to prevent exposure to wastewater, including using the engineering and administrative controls, safe work practices, and PPE normally required for work tasks when handling untreated wastewater.

The CDC provides additional information about wastewater management.

UNITED STATES
DEPARTMENT OF LABOR

Occupational Safety and Health
Administration
200 Constitution Ave NW
Washington, DC 20210
☎ 800-321-6742 (OSHA)
TTY
www.OSHA.gov

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