

# OSHA Recommendations for Municipal Solid Waste, Medical Waste, and Wastewater with Possible COVID-19 Contamination

by Hannah D. Vanderlaan

A FREEBORN & PETERS LLP CLIENT ALERT

The Occupational Safety and Health Administration (“OSHA”) has recently released [guidance](#) for solid waste and wastewater management workers and employers handling waste with potential or known COVID-19 contamination. This Alert details what that guidance means for employers.



While OSHA previously recommended treating this waste as regulated medical waste, OSHA now states that “the 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.” This change came after recent engagement by both the National Waste & Recycling Association (“Nwra”) and Solid Waste Association of North America (“Swana”).

Per the updated OSHA guidance, “[w]orkers and employers should manage municipal (e.g., household, business) solid waste with potential or known COVID-19 contamination like any other non-contaminated municipal waste.” OSHA’s recommendation includes maintaining standard safety precautions that have been put in place, such as using puncture-resistant gloves and face and eye protection. These same recommendations also apply to workers handling recyclable material.

For medical waste with potential or known COVID-19 contamination, OSHA’s recommended approach is the same as for any other medical material. OSHA recommends continuing to use typical engineering and administrative controls, safe work practices, and personal protective equipment (“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.

From a wastewater treatment perspective, OSHA has indicated the virus is considered susceptible to normal disinfectant procedures in wastewater, so current disinfection conditions in wastewater treatment facilities is 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. According to OSHA, “[t]here 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.”

**If you have questions, please contact Hannah Vanderlaan and stay tuned for more developments on [Freeborn’s COVID-19 webpage](#).**

## ABOUT THE AUTHOR



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Hannah's practice focuses primarily on environmental-based litigation and regulatory counseling. Prior to joining Freeborn as an attorney, Hannah was a Law Clerk at the firm in the Environment and Energy Law practice group. In addition to working at Freeborn, while in law school, Hannah served a Legal Extern at the U.S. Environmental Protection Agency and The Office of Illinois Attorney General, Environmental Bureau.

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