



The Resource Recovery Coalition of California (Resource Coalition) has developed this guidance document to help local and state government agencies understand how the solid waste and recycling industry will continue to provide essential collection and processing services in the event operational personnel are unavailable due to COVID-19 virus-related issues. Additionally, the Resource Coalition advises our solid waste and recycling industry member companies to follow the worker safety guidance released by the [National Waste & Recycling Association \(NWRA\)](#), the [Solid Waste Association of North America \(SWANA\)](#), the [US Occupational Safety and Health Administration \(OSHA\)](#), and the [US Centers for Disease Control and Prevention \(CDC\)](#). The [California Employment Development Department \(EDD\)](#) and the [California Labor and Workforce Development Agency](#) also provide resources for workers and employers impacted by COVID-19 virus-related issues.

Many employers, including solid waste and recycling companies, have already implemented work from home policies for office staff where possible to prevent the spread of infection and keep employees safe. However, operational jobs and essential public services, including solid waste collection and processing, cannot be done remotely. Uncollected solid waste poses its own public health and safety hazard, and collection must occur regardless of how the COVID-19 virus develops. The Resource Coalition proposes the following guidance on how to maintain service in the event increasing numbers of drivers and facility operators are unable to work:

- All solid waste and recycling facilities should consider suspending public access to non-essential on-site activities. This does not include self-haul to transfer stations and landfills, but may include activities such as facility tours, public drop-off, beverage container redemption, in-person bill pay, and other similar activities. Notice should be provided to customers that all best efforts will be taken to address questions and concerns via phone, email, or website communication.
- To prevent further spread of the COVID-19 virus, drivers and facility operators who feel sick should remain home unless and until they test negative for the COVID-19 virus. Additionally, staff, safety, and other regular large group meetings may be suspended to abide by local, state, and federal guidelines and mandates on social distancing and limiting crowd sizes. To the extent these meetings are required by local or state law or other agreement, applicable waivers will be necessary.
- If drivers are in short supply, the following actions may be taken:
  - Activate normal operational procedures when employees are sick, including using other available drivers and cross-trained employees to provide coverage.
  - To the extent possible, explore coordinating with other collection companies and/or local jurisdictions to assist in providing service.
  - Authorize extended and overtime hours to available drivers to cover additional routes. This may result in collection beyond the hours agreed to with the local jurisdiction, and waivers will be required to continue service.



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- Initiate every other week, instead of weekly, collection schedule.
- Identify essential core services and consolidate routes to expedite collection of materials. This may include:
  - Collecting all material as municipal solid waste (MSW) and transporting it to the transfer station or landfill.
  - Reducing or suspending collection of recyclable and/or green material and collecting only putrescible MSW that poses a greater threat to public health and safety.
- Prioritize collection from those customers whose waste may pose the greatest threat to public health and safety. This may include large putrescible MSW generators, healthcare facility and laboratory waste, and similar generators.
- If processing facility employees are in short supply, the following actions may be taken:
  - Activate normal operational procedures when employees are sick, including identifying cross-trained employees who can provide coverage as needed.
  - Identify non-essential operations that can be suspended if necessary in an emergency situation.
  - To the extent possible, explore coordinating with other collection companies and/or local jurisdictions to assist in providing service.
  - Reduce or suspend processing materials and transfer them to landfill. This may result in material diversion rates below state and local mandates, and state and local waivers will be required. In the event it becomes more difficult to move recyclable material domestically and/or internationally due to COVID-19 virus-related transport and shipping issues, that material may need to be transferred to landfill. Again, appropriate state and local waivers will be required.
- In light of the declared State of Emergency, to address these unprecedented circumstances, collection and processing companies may need to modify their operations in ways that are inconsistent with their permits or other agreements. Please refer to CalRecycle's guidance on [Emergency Waiver of Standards](#), as well as [Additional Storage of Recycled Materials at Solid Waste Facilities](#).

It should be noted that drivers are not at elevated risk of contracting the COVID-19 virus in the course of their job. They often manage a collection route alone and use automated trucks that prevent them from handling waste directly. Nonetheless, drivers and other operational employees are encouraged to follow the [OSHA guidelines](#) to use appropriate engineering and administrative controls, safe work practices, and personal protective equipment, which includes puncture-resistant gloves and face and/or eye protection.

Additionally, in the event waste is or is suspected to be contaminated with the COVID-19 virus, we recommend waste generators follow [NWRA](#), [OSHA](#), and [CDC](#) guidelines as discussed below:



- **Residential Waste:** The CDC determined the COVID-19 virus is not a Category A infectious substance, therefore solid waste from households that is or is suspected to be contaminated with the virus can be managed as it would be for the flu. In an abundance of caution, generators should ensure waste bags are tightly closed and curbside containers are not overfilled so the lids close completely. Please notify your local waste company if you know or suspect your waste is contaminated with the COVID-19 virus.
- **Commercial Waste:** Solid waste from commercial generators may also be managed as it normally is unless directed otherwise by the local health department. Again, to the extent possible, generators should ensure waste bags are tightly closed and containers are not overfilled so the lids close completely. Please notify your local waste handling company if you know or suspect your waste is contaminated with the COVID-19 virus.
- **Healthcare Facility Waste:** OSHA guidance for waste management is based on the CDC's determination that the COVID-19 virus is not a Category A, but rather a Category B infectious substance. According to the [US Department of Transportation \(DOT\)](#), waste generated in the diagnosis, treatment, immunization, or biomedical research of a Category B material is considered a [regulated medical waste](#) and should be managed as such. Workers should use appropriate engineering and administrative controls, safe work practices, and personal protective equipment to prevent exposure. COVID-19 virus-contaminated waste need not be separated from other regulated medical waste. However, NWRA does recommend COVID-19 virus-contaminated waste be identified to protect workers in the event a waste bag must be opened for any reason. Please verify any additional safety and handling provisions with your local waste handling company.
- **Laboratory Waste:** [CDC guidelines](#) recommend handling lab waste from testing suspected or confirmed COVID-19 patient specimens as all other [biohazardous waste](#) in the lab. Currently, there is no evidence to suggest that this lab waste needs any additional packaging or disinfection procedures. Personnel should follow standard procedures associated with other respiratory pathogens, such as seasonal flu and other corona viruses. Biohazardous waste containers should be leakproof and closed prior to removal from the lab for decontamination. If there is no autoclave on-site, then pack waste in accordance with institutional policy and procedures.

Please note, this is only a guidance document. Local jurisdictions should coordinate with solid waste and recycling collection companies and material processing facilities to determine how best to handle COVID-19 virus-related service impacts in their communities.

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