



March 20, 2020  
File No. 31-320.10

Jerrad Johnson, Vice President  
B&N Trucking Inc.  
15200 Scofield Ave.  
Wasco, CA 93280

Dear Mr. Johnson:

**Transportation of Biosolids in Response to COVID-19 Measures**

Thank you for your continued service in transporting Los Angeles County Sanitation Districts (Districts) biosolids. **It is important to note that the Districts' wastewater facilities will continue operating – and producing biosolids – throughout state and local government responses to COVID-19.**

On March 19, 2020, the State of California, County of Los Angeles, and the City of Los Angeles issued “Safer at Home” emergency orders for COVID-19 that limits public travel in California. These orders provide categorical exemptions for workers supporting “essential infrastructure”.

The purpose of this letter is to affirm that:

1. Sanitation services, including sewage treatment, provided by the Districts are considered by the federal and state governments to be essential public services, and
2. Business supporting the Districts’ role serving the public are also considered by the federal and state governments to be essential.

The Federal Emergency Management Agency’s (FEMA) 2018 Continuity Guidance Circular identifies eight “National Essential Functions (NEFs)” that must be provided during and after an emergency. The continued operation of all Districts facilities is required under NEF 8.

***NEF 8: Provide basic essential services, focusing on providing water, power, healthcare, including disability support services and personal assistance services, communications, transportation services, sanitation services, environmental protection, commerce, education, and child care. These services must continue or be restored quickly to provide for basic needs. Other less critical services may be delayed or deferred at the organization’s discretion; the focus is on providing those critical services necessary to sustain the population and facilitate a return to normalcy. This falls under the scope of NEF 8.***

Similarly, the U.S. Department of Homeland Security states that “Properly treated wastewater is vital for preventing disease and protecting the environment. Thus, ensuring the supply of drinking water and wastewater treatment and service is essential to modern life and the Nation’s economy.” (<https://www.cisa.gov/water-and-wastewater-systems-sector>)

Additionally, California law expressly defines sewage treatment as an essential public service in Health & Safety Code Sec. 42352, Paragraph 2:

*“essential public service” means a prison, detention facility, police or firefighting facility, school, health care facility, landfill gas control or processing facility, **sewage treatment works**, or water delivery operation...*

As an essential public service, all Districts’ facilities will continue operating during the periods of these emergency orders. Biosolids haulers play a crucial public health role by transporting wastewater biosolids to sites equipped for biosolids management. It is critical that the essential service of biosolids hauling continue uninterrupted during and after the COVID-19 response.

If you have any questions or require additional information, please contact Matt Bao by telephone at (562) 908-4288, extension 2824, or by email at [mbao@lacs.org](mailto:mbao@lacs.org).

Very truly yours,



Matthew J. Bao  
Supervising Engineer  
Reuse and Compliance Section

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