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Report of Inspection

FILE NO: 26-0010-R

SUBJECT MATTER: Inspection of PPE use and adherence to policy and procedures of cleaning crew in charge of cleaning human feces based off 311 calls.

STATUS: Final

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Investigative Informative Case Synopsis was completed on February 21, 2025 and presented to the AGOC on April 29, 2025 where it was heard and deferred.

Inspection Initiation:

As part of OIG report 24-0162-C the following note was added:

NOTE: To expedite the release of this report, the Office of the Inspector General (OIG) separately requested applicable policies, procedures, and standard operating procedures and will be conducting an inspection of Personal Protective Equipment (PPE) compliance for City and temporary employees involved in the feces removal program. Although PPE compliance and overall program safety were not part of the original complaint, these issues were identified during the investigative process, and the original report included a recommendation related to training and safety. Accordingly, the OIG will conduct a separate review of the feces removal program to assess employee safety. The results of that review will be posted on the OIG website upon completion.

Inspection Scope:

Cleaning crew's adherence to departmental policies and procedures regarding PPE compliance, cleaning process, waste handling and disposal.

Abbreviations:

E1:	Temporary Worker for Cleaning Crew
E2:	Temporary Worker for Cleaning Crew
EHD:	Environmental Health Department
OIG:	Office of Inspector General
PPE:	Personal Protective Equipment
SME1:	Subject Matter Expert
SME2:	Subject Matter Expert
SW:	Solid Waste Department

Procedures Performed:

- **Review of Departmental Policy:** Conducted to establish the correct PPE use for OIG field inspection.
- **OIG Field Inspection:** Conducted to observe the procedures performed by the cleaning crew.
- **OIG and Environmental Health Department Field Inspection:** Subsequent inspection completed with the Environmental Health Department (EHD) Public Health Compliance manager and Deputy Director, in order to use their knowledge and expertise and subject matter experts in proper use of PPE and compliance with OSHA and other safety standards.

Solid Waste Departmental Policy:

The OIG requested and reviewed Solid Waste Department (SW) policy related to the human feces removal program. The OIG compiled the policies and identified the following steps for proper and safe disposal according to the policies provided:

Step 1: Wear Mandatory PPE

Always wear appropriate PPE to prevent disease transmission and chemical exposure. According to the sources, this includes:

- Medical-grade nitrile gloves.
- Face shields or safety glasses.
- Protective clothing and gloves resistant to chemicals (such as butyl rubber or neoprene).
- Safety vests if working near traffic or active scenes.

Step 2: Removal Procedures

The method of removal depends on the environment and the scale of the waste:

- Professional/Large Scale: Utilize specialized equipment such as the FX20 Vacuum Excavator or heavy-duty twister vacuums designed for the handling and removal of feces.
- Forest Locations: In specific outdoor settings like forests, burying human feces may be the correct disposal method.
- Sensitive Environments: In desert, alpine, or narrow river canyon areas, waste must be packed out using a Waste Alleviation and Gelling (WAG) bag or other portable toilet equipment.
- Hard Surfaces: For solid waste on surfaces, scrapers and scrub brushes may be used for initial removal before disinfection.

Step 3: Disinfection and Sanitization

Once the bulk material is removed, the area must be thoroughly decontaminated:

- Apply a 5.25% water/bleach mixture to target surfaces to ensure disease prevention.
- Alternatively, use biodegradable general cleaners and restorers formulated to disinfect hard, non-porous environmental surfaces like floors and walls.
- Sanitize vacuum excavator machines and other equipment daily after use.

Step 4: Proper Disposal

Feces are categorized as "black water" (liquid waste contaminated by human excrement).

- Empty waste into an approved sewer drains specifically designated for human wastewater.
- In municipal settings, liquid waste may be disposed of at designated facilities such as the Southside Water Reclamation Plant (SWRP).

- If using professional disinfectants, ensure containers are triple-rinsed before disposal according to local regulations.

Step 5: Post-Cleanup Hygiene

- Wash hands frequently with soap and water.
- Separate eating areas strictly from work areas where feces removal has occurred.
- Clean and maintain protective clothing separately from other laundry.

OIG Field Inspection: Clean Up

The OIG conducted a field inspection of the cleaning crew with the purpose and intent of inspecting the programs policies and procedures were being followed. The OIG conducted two separate inspections of the cleaning crew in order to observe each member perform their job duties.

During this inspection, the OIG was not able to observe a disposal as detailed in “Step 4: Proper Disposal” above.

The OIG asked the crew members what training they had received and when they were hired for this position. E1 and E2 stated they received training on the use of the machinery used, tools used, and what safety equipment to use.

During this observation the OIG identified that the cleaning crew did not utilize medical-grade nitrile gloves, and instead wore durable work gloves. When questioned regarding this practice, crew members stated that this was due to them handling other types of hazardous wastes such as sharp objects (needles), contaminated clothing in the cleaning area, contaminated trash in the cleaning area, etc.

The OIG also observed that the cleaning crew did not utilize face shield or safety glasses during cleaning. When asked, E1 stated that they use a face shield when using the vacuum excavator, which was not in use during the inspection due to the outside weather temperature being too cold to safely operate the machine without damage. The OIG observed E1 wearing sun glasses and E2 wearing prescription eye glasses during the inspection.

The OIG observed the use of other protective clothing and safety vests were used during this inspection. The OIG asked E1 how often their PPE was changed out. E1 stated that PPE is changed weekly or as needed. E2 stated they will change their suit when they notice fecal matter on it.

When asked how the contaminated PPE suits are disposed of, E1 stated they put the used PPE into the same bag being used to collect contaminated materials for that day before changing into a new suit.

The OIG observed several service locations which all fell under the “hard surfaces” definition as detailed above. At each location, the cleaning crew removed the bulk items and the contaminated human waste items (i.e., clothing, bottles, trash, etc.) into a trash bag. The crew then removed the bulk of the human waste present in the area, followed by spraying the affected area with what was identified as a mixture of bleach and water by the cleaning crew.

After spraying, the area was scraped until the human waste was removed and placed in the trash bag along with the other contaminated items. The bag was then loaded into the truck for later disposal. When asked where the contaminated materials were disposed at, E1 stated the trash bag is disposed of in a contaminated waste bin at the Edith Yard.

E1 shared that the tools used in the cleanup are cleaned with the same bleach and water mixture before they are put back into the truck.

OIG Observation: Follow Up

The OIG conducted a follow up inspection when the outside temperature was warmer in order to observe the use of the vacuum excavator. Additionally, the OIG also observed the waste water disposal process done by the cleaning crew. This disposal was done at the Bernalillo County Water Authority located at 4201 2nd St SW, Albuquerque NM 87105. During this inspection, the OIG observed E2 utilizing a face shield while operating and cleaning out the vacuum excavator.

This process consisted of draining blackwater waste from the vacuum excavator into a sewer drain designated for human wastewater disposal. E2 then utilized a clean water hose to rinse out the vacuum excavator until no visible blackwater discharge remained.

OIG and EDH Field Inspection

The OIG conducted a follow up inspection of the cleaning crew with the assistance of the Environmental Health Department (EHD) Public Health Compliance Manager (SME1) and Deputy Director (SME2).

The purpose of this follow up inspection was to utilize the knowledge and expertise of SME1 and SME2 to provide additional insight regarding the use of PPE and other operational practices observed during the cleanup. From the observation, SME1 provided the following summary¹ of their observations, independently from the OIG:

“City personnel performing human waste cleanup activities operate in environments with potential exposure to biological contaminants and infectious materials. While appropriate PPE was generally available during observed operations, opportunities exist to improve consistency in PPE utilization practices. Reinforcement of safety protocols, combined with enhanced use of waterproof latex gloves, rubber boots, and durable face shield may further reduce occupational exposure risks and support worker safety.”

SME1 included the following in their justification of their conclusion:

- **Improper Gear:** SME1 identified workers reuse porous leather gloves and lack impermeable rubber boots, which is not in line with Occupational Safety and Health Administration (OSHA), Center for Disease Control and Prevention (CDC) standards.
- **Contamination Risks:** SME1 identified current disposable face shield leak contaminated water, and soiled gear is stored alongside personal items like water coolers.

¹ Full Environmental Health Department Report attached as Exhibit 1

- **Procedural Gaps:** SME1 identified a lack of decontamination for boots, tools, and electronics used in the field.

SME1 provided the following recommendations to increase emphasis on based on their observations:

- Use of rubber boots, latex gloves, and reusable face shields.
- Use of tongs or grabbers to handle needles
- Decontamination of rubber boots and hands should be performed prior to entering the truck cabin.
- Coverall suits should be removed prior to entering the truck cabin.
 - o If not operationally feasible, the truck cabin should be equipped with a protective, washable covering that can be removed and decontaminated.
- Refresher training on proper donning and doffing of coverall suits and decontamination protocols.

Conclusion

Based on the field inspections conducted, the OIG determined that the cleaning crew generally adhered to the Solid Waste Department's policy regarding human waste cleanup operations. However, the OIG identified the following deviations from established practices:

- Work gloves made of durable material were used in place of medical-grade nitrile gloves.
- Face shields were utilized only when operating the vacuum excavator. No other safety glasses were observed in use; instead, employees relied on sunglasses and prescription eyeglasses while not operating the vacuum excavator equipment.

To supplement the OIG's inspection, the Environmental Health Department provided subject matter expertise regarding personal protective equipment (PPE), decontamination practices, and worker safety considerations. The Environmental Health Department concluded that personnel generally had access to appropriate PPE and demonstrated awareness of its importance while performing human waste cleanup activities. However, opportunities were identified to improve the consistency of PPE utilization practices.

Recommendations included reinforcing PPE protocols, emphasizing the use of appropriate protective equipment such as latex gloves, rubber boots, and durable face shields, ensuring proper decontamination procedures, and providing refresher training related to PPE use, hand hygiene, and occupational exposure prevention.

Overall, while the observed operations generally complied with departmental requirements, implementation of the Environmental Health Department's recommendations would further strengthen worker safety practices, reduce the potential for occupational exposure to workplace hazards, and promote greater consistency in the use of protective measures during human waste cleanup activities.

The OIG would like to thank the Environmental Health Department staff who participated in the field inspections and provided valuable subject matter expertise for this inspection. The OIG also

extends its appreciation to Solid Waste Department staff for their cooperation, professionalism, and assistance during the inspection process.

Recommendation

The Solid Waste Department should strengthen oversight and training to ensure employees consistently utilize appropriate PPE during human waste cleanup operations and evaluate the implementation of the Environmental Health Department's recommendations to further reduce occupational exposure risks.

Management Response

This summary is provided in response to recommendations identified by the OIG and the EHD regarding field operations conducted by the SWMD Cleaning Team. SWMD is committed to implementing corrective actions to improve employee safety, prevent contamination, and ensure compliance with established health and safety standards.

In addition to the corrective actions listed below, SWMD will implement an updated training program beginning June 22, 2026. All affected employees will receive the training, followed by mandatory biannual refresher training to reinforce procedures and maintain compliance.

Finding and Corrective Actions

1. Poly Suits Worn for Extended Periods of Time

Corrective Action:

SWMD will provide training emphasizing the importance of changing disposable protective suits after each cleanup event. Supervisors will monitor compliance to ensure consistency and proper use.

2. Entering Truck Cab Without Proper Decontamination

Corrective Action:

SWMD will provide disinfectant spray and establish decontamination procedures that must be completed before entering the vehicle cab following cleanup operations.

3. Failure to Wash Hands After Cleanup Activities

Corrective Action:

SWMD will provide disinfecting hand wipes and evaluate the implementation of a mobile handwashing station on service vehicles to ensure proper hand hygiene following each cleanup.

4. Use of Leather Gloves Instead of Disposable Gloves

Corrective Action:

SWMD will implement a double-glove policy. Employees who prefer leather gloves will be required to wear disposable latex or nitrile gloves additionally to provide an appropriate contamination barrier.

5. PPE Cross-Contamination

Corrective Action:

SWMD will provide removable storage containers to separate clean and contaminated equipment. Additional training will be conducted on proper PPE donning and doffing procedures to reduce the risk of cross-contamination.

6. Lack of PPE Cleaning and Sanitization During Workday

Corrective Action:

SWMD will provide training covering the importance of regularly cleaning and sanitizing reusable PPE throughout the workday and at the conclusion of operations.

7. Failure to Sanitize Electronic Tablets

Corrective Action:

SWMD will provide disinfectant wipes for all electronic devices and implement procedures requiring routine sanitization of tablets and other frequently handled equipment.

8. Improper Use of Disposable Face Shields

Corrective Action:

SWMD will provide refresher training on the proper wear and adjustment of face shields and facial protection to ensure adequate coverage and protection from contaminated liquids.

9. Poly Suits Not Properly Sealed

Corrective Action:

SWMD will provide training on the proper fitting, sealing, and inspection of disposable protective suits to ensure employees receive the maximum level of protection.

10. Rubber Boots Not Utilized

Corrective Action:

Effective June 18, 2026, all cleaning crew members will be sized for impermeable protective footwear, and appropriate footwear will be ordered and issued. Once issued, the use of rubber boots will be mandatory during cleanup operations.

Conclusion

SWMD appreciates the observations and recommendations provided by OIG and EHD. The department is committed to addressing all identified deficiencies through enhanced training, improved equipment availability, strengthened procedures, and increased supervisory oversight. These corrective actions are intended to improve employee safety, reduce contamination risks, and ensure continued compliance with health and safety requirements.

SWMD will continue to evaluate the effectiveness of these corrective measures and make additional improvements as necessary.

Exhibit 1: Environmental Health Department Observation Report

The following is the report, in its entirety from SME1 with the EHD that is referenced in the report above:

Human Waste Cleanup Operation Observation Report

Background

On May 14, 2026, SME1, conducted field observations of City personnel performing human waste cleanup activities within the City of Albuquerque. The purpose of the observation was to evaluate work practices related to personal protective equipment (PPE) usage and overall worker safety during exposure to human excrement and potentially infectious materials.

Observations

During the observation period, personnel assigned to cleanup activities were wearing PPE appropriate for the tasks being performed; however, deficiencies in the proper utilization of such PPE were observed.

PPE utilized during the activities included leather gloves, polypropylene coveralls, face masks, disposable face shields, work boots, and additional protective clothing intended to minimize direct exposure to contaminated materials and surfaces.

- Upon questioning, employees mentioned the reuse of a single polypropylene coverall suit for a period of up to two weeks before replacing it, unless observable ruptures or damage to the suit are present.
- Employees were observed entering the City truck cabin without removing the polypropylene coverall suit, and no proper decontamination of footwear or handwashing was observed prior to entering the vehicle cabin.
- Handwashing was not observed following each human waste cleanup activity.
- Employees reuse leather gloves during cleanup activities in place of the disposable latex gloves available to them. Leather gloves were preferred by employees due to the fact that they also pick up sharps and needles.
- Leather gloves are stored in a bucket containing the face shield, creating the potential for contamination of equipment intended to protect facial features.
- Personal belongings are kept in the bucket mentioned previously, this bucket along with a personal water cooler are kept in proximity to the vacuum excavator and tools utilized for human waste cleanup and not in the vehicle's cabin.

- No cleaning or sanitizing of the face shield, leather gloves, or boots was observed during the course of field activities.
- No cleaning or decontamination of the electronic tablet used for pictures and documentation was observed.
- The face shield currently utilized is of a disposable type and was observed to allow contaminated water to leak onto the employee's face, neck, and chest during cleanup operations.
- Gaps in the interface between the protective coverall suit, gloves, and boots were observed, which may reduce the effectiveness of the PPE barrier against contamination.
- Rubber boots or impermeable protective footwear were not part of the standard PPE utilized during the cleanup activities.

Applicable Guidance and Best Practices

According to the Occupational Safety and Health Administration (OSHA), PPE is required to minimize exposure to workplace hazards that may result in injury or illness. OSHA guidance further notes that workers with potential exposure to infectious materials should utilize appropriate protective barriers, including gloves and protective footwear.

The Centers for Disease Control and Prevention (CDC) recommends that workers handling human waste or sewage utilize waterproof gloves and rubber boots to reduce exposure risks and prevent contamination during cleanup operations.

Additionally, the City of Albuquerque Environmental Health Department Human Excrement Cleanup Guidance specifically recommends the use of rubber boots and gloves during feces cleanup activities.

Recommendations

Overall, staff demonstrated awareness of the importance of PPE use while performing cleanup operations and did not express any concern or dissatisfaction. However, opportunities were identified to improve consistency in PPE utilization practices throughout field activities.

We recommend the following:

- Reinforce proper and consistent PPE utilization practices among personnel performing human waste cleanup activities.
- Continue ensuring the availability of appropriate PPE for all workers assigned to these duties.
- Polypropylene coverall suits should be disposed of after each human waste cleanup activity and not reused.

- Polypropylene coverall suits should be removed prior to entering the truck cabin. If this is not operationally feasible, truck cabin seats should be equipped with a protective, washable covering that can be routinely removed and decontaminated.
- Due to the nature of the work environment, which may include contact with wet, contaminated, or splash-prone surfaces, the use of rubber boots is highly recommended to further reduce the potential for occupational exposure and contamination.
- Decontamination of rubber boots and handwashing should be performed prior to entering the truck cabin.
- Provide employees with reusable, durable face shields appropriate for splash-prone environments.
- Increase emphasis on the use of:
 - Latex gloves
 - Pick up needles or sharps with grabbers/tongs/pliers or tweezers, keeping the needle tip pointed away from employee
 - Rubber boots or impermeable footwear
- Provide refresher training regarding:
 - Proper donning and doffing of PPE
 - Hand hygiene practices
 - Decontamination procedures
 - Prevention of occupational exposure to biological hazards

Conclusion

City personnel performing human waste cleanup activities operate in environments with potential exposure to biological contaminants and infectious materials. While appropriate PPE was generally available during observed operations, opportunities exist to improve consistency in PPE utilization practices. Reinforcement of safety protocols, combined with enhanced use of waterproof latex gloves, rubber boots, and durable face shield may further reduce occupational exposure risks and support worker safety.