

COVID-19 HEALTH & SAFETY GUIDANCE

OPERATING & RE-OPENING PRACTICES

May 2020

Purpose

This guidance is designed to assist employers in making decisions during and in the aftermath of the COVID-19 pandemic, especially to protect vulnerable workers. State and local governments are issuing new safety protocols that sometimes go beyond federal guidance and include new mandates. This document provides ISRI members with:

- Federal OSHA and CDC guidelines for operating safely
- Risk assessment protocols for determining whether to open & operate post-COVID-19
- Links to [ISRI's COVID-19 State Reopening laws](#) along with H&S planning guidance
- Recommendations from ISRI members on how to best comply with new protocols

Getting Started

Employers have a general duty under OSHA Section 5(a)(1) to provide employees with a workplace free from recognized hazards likely to cause death or serious physical harm. Similar duties arise under state statutes and common law with respect to both employees and third parties who may enter a workplace, such as customers and visitors.

The global pandemic of COVID-19 poses an unprecedented public health challenge that led to state governors ordering the closure of schools, workplaces and nonessential businesses in a piecemeal approach with little consistency. To stem the rising economic harm, states are now seeking to reopen their economies while enforcing enhanced safety and health protocols.

- All business (essential and nonessential) are required now to implement new protocols
- State reopening plans are different from state-to-state and even by locality
- ISRI members can obtain links to all 50 (+DC) state reopening plans & EHS guidelines and mandates in one location: [COVID-19 State Reopening / H&S Updates](#)

⚠ As the COVID-19 situation evolves, it is important to check with state and local health officials and other partners to determine the most appropriate and current actions.

NOTE: *This document is not legal advice. Please consult an attorney or legal advisor regarding the application of state and local actions that could impact your businesses, including executive orders, public health orders, proclamations, laws, and regulations.*

Step One: Review OSHA Compliance

Employers are required by OSHA to have a plan that includes prevention of employee health hazard exposures and accidents. This *safety and health management system* is required for any business operating and those considering re-opening following a COVID-19 shutdown.

There are four basic elements to all good safety and health programs. These are as follows:

- 1. Management Commitment and Employee Involvement.** The manager or management team leads the way, by setting policy, assigning and supporting responsibility, setting an example and involving employees
- 2. Worksite Analysis.** The worksite is continually analyzed to identify all existing and potential hazards
- 3. Hazard Prevention and Control.** Methods to prevent or control existing or potential hazards are put in place and maintained
- 4. Training for Employees, Supervisors and Managers.** Managers, supervisors and employees are trained to understand and deal with worksite hazards

Business choosing to operate should implement and follow a hierarchy of controls to ensure a safe workplace. These controls should be addressed by employers in the following order:

- Engineering Controls
- Administrative Controls
- Safe Work Practices
- Personal Protective Equipment; and
- CDC Guidelines for operating under COVID-19

In light of COVID-19, employers are reminded they must also:

- Develop an infectious disease preparedness and response plan and,
- Develop policies and procedures for prompt identification and isolation of people who may have COVID-19 symptoms

Step Four of this guidance provides examples from industry EHS experts on how they are implementing these controls in their workplaces.

Step Two: Assess the Risk Level

To reduce the impact of COVID-19 outbreak conditions on businesses, workers, customers, and the public, it is important for all employers to have an operating plan prior to re-opening.

Employers should begin with assessing the situation. This assessment will help employers determine if it is possible to safely conduct business.

1. Review CDC and OSHA Guidance

- Assess worker risk level (see: "Reopening Workplaces During the COVID-19 Pandemic," CDC)
- How close do workers need to be with one-another will determine their risk levels. This is based on OSHA guidance - Guidance for Preparing Workplaces for COVID-19 and <https://www.osha.gov/Publications/OSHA3990.pdf>
- Does the community have specific guidance or mitigation requirements?

2. Should the business be operating?

- Review the community's health and readiness along with mitigation practices
- Assess the readiness to be able to comply with state and local executive orders
- Protections for vulnerable employees are planned and ready to implement

3. Are the required safety protocols and practices in place?

- Ample and ramped up workplace health & safety hygiene procedures & supplies
- Intensified cleaning, disinfection, and ventilation
- Specific and deliberate social distancing protocols, including staggered staffing
- Limited travel and telework policies
- Staff training program on all safety plans and programs

4. Is there a company protocol for ongoing monitoring in place?

- A plan for checking signs and symptoms of employees
- Policy for sick employees to stay at home & flexible leave policies
- Clear directions and protocols for when employees get sick
- Regular communications with local authorities and employees
- Monitoring system for absences
- Established plan in place in the event of a resurgence of the virus

Step Three: COVID-19 Health & Safety Planning

Employers face difficult choices as they seek to resume or ramp up operations after partial or total shutdowns due to the COVID-19 pandemic. Their ability to reopen quickly may be impaired by issues ranging from the availability of personal protective equipment (PPE) to the difficulty of implementing reasonable precautionary measures.

- COVID-19 safety and health practices are now required for all businesses in nearly every state with social distancing and cleaning being the most common, though many states and localities are adding PPE requirements such as face coverings and gloves.
- Individual State COVID-19 guidance and requirements are compiled in the [ISRI COVID-19 State Reopening/H&S Updates](#) available on the [ISRI.org/COVID-19 Resource Hub](#).
- Proper planning and procedures for the [discontinuation of quarantine and social isolation for persons with COVID-19](#) must be ready prior to reopening.

To assist ISRI members with rapidly changing COVID-19 specific health and safety developments, ISRI is carefully monitoring relevant data and resources to keep members informed on the latest safe operations, advocacy, state & local policy and economic resources relating to the COVID-19 pandemic.

- ISRI urges members to review the [ISRI COVID-19 Operating Guidelines](#) available on the [ISRI COVID-19 Resource Hub](#).
- The guidelines are based on CDC and OSHA recommendations, though many state and local authorities have incorporated these into executive orders that make them.

Practically speaking, employers must plan for and manage health and safety risks and issues as they resume operations. At the same time, because best practices and guidance will continue to evolve, any plan will require flexibility until a new “normal” emerges or risks and concerns diminish.

- As this is a fluid situation, consider a soft opening when restarting the business, which can provide all of those involved an opportunity to acclimate to the situation.
- It is important to get various personnel from across the company involved when creating a COVID-19 health and safety plan in order to provide many different perspectives on how the plan will affect the business.
- Top down leadership is extremely important to help employees adapt to this COVID-19 culture change in the workplace.

Step Four: Seek Advice from Industry EHS Professionals

The following represents recommendations from recycling industry EHS professionals who shared with ISRI how their companies are implementing COVID-19 health and safety protocols and practices in line with the CDC and OSHA guidelines and many state & local requirements.

The information is presented in the categories in which most of the federal and state guidance materials have listed for safe operations.

Social Distancing (*Administrative Controls*)

- 1.** Split personnel into shifts to enable better distancing & comply with state rules
- 2.** Control and/or stagger customers coming in to the business
- 3.** Consider moving staff with work stations near high pedestrian traffic areas or put plexiglass up in these areas
- 4.** Hold regular tailgate/toolbox talk meetings to keep team informed
- 5.** Stagger breaks
- 6.** Break Room Adjustments:
 - Change breaks to limit the number of employees in the break room
 - One person per table in the break room
 - Remove chairs from break room tables to create more space between people
- 7.** Implement a Call First Policy – call desk to desk to limit visitation unless mandatory
- 8.** Designate one person to move around to and through all departments (mail delivery, messaging, etc.) to minimize movement and possible spread of virus
- 9.** Consider going “cashless” and “paperless” to the extent possible in order to avoid transmission of virus
- 10.** Controlled Entrance/Exit:
 - Badged entrance is one employee at a time
 - Permanently open all pass-through doors so no touching required
 - Implement hand sanitizer area at (SwipeClock)
 - No touch temperature detection upon entry for all outside guests.
- 11.** Consider banning smoking from premises to prevent or slow down hands-to-face/mouth movements

Sanitation/Cleaning/Hygiene Practices (*Safe Work Practice Controls*)

- 1.** Have sufficient wipes/disinfectant - consider alternatives since they're in short supply
- 2.** Wipe down & sanitize portable and stationary toilets regularly; place disinfectant in all restrooms
- 3.** Wipe down and sanitize all hand rails and high touch areas, and cleanse high traffic doorknobs and door pads twice daily
- 4.** Cleanse microwave, refrigerator, and sink handles, and paper towel dispensers multiple times daily (breakroom)
- 5.** Place cleansing wipes in all First-aid locations
- 6.** Place hand sanitizer in all work areas for employee use
- 7.** Wipe down and sanitize shared equipment and motor vehicles
- 8.** Maintain and understand SDS's for all cleaning supplies
- 9.** Make hand sanitizer and/or hand soap available
- 10.** Sanitize tables, chairs, phones multiple times daily
- 11.** Cleanse regular doorknobs (not in high-traffic areas) once daily
- 12.** When using cleaning solutions on surfaces, let them air dry after applying. If you apply, then immediately wipe them down the disinfectant may become ineffective

Personal Protective Equipment (*Preventative Controls*)

- 1.** Gloves
- 2.** Install worker partitions
- 3.** Install sneeze guards
- 4.** Face Coverings / Masks
 - ▲** Check state & local authorities for face covering mandates
 - N95 masks as required
 - Disposable masks as applicable
 - Employee-made masks as appropriate

All OSHA rules on masks/respirators continue to apply

Health Screening Practices (*Administrative Controls*)

- 1.** Take employee temperatures daily at start of shift
 - Maintain and calibrate temperature sensing device
 - Follow your local/state guidelines for temperature readings
 - Consider using a temperature sensing device that maintains distancing rules and set it up on tripod
 - Employee who takes temperatures of others is in full PPE
 - No touch temperature detection or other means of detection upon entry to jobsite
 - Keep confidential records of temperatures separate from employees' HR files
- 2.** Keep confidential weekly logs of screening data collection for individual employees
- 3.** Question employees if household members are experiencing COVID-19 symptoms
- 4.** Ask employees regularly if they are experiencing any COVID-19 symptoms
- 5.** Organize an opening event. Create a relationship that might allow cross-promotions.

Signage Practices (*Administrative Controls*)

- 1.** Signage should be clear and understandable
 - Customer signage outlining business policies posted conspicuously
 - Clearly mark customer waiting areas and line standing positions
 - 2.** Employee signage placed throughout the facility
 - Post Family First Coronavirus Response Act (FFCRA) – required poster
 - Post Covid-19 symptoms flyers (Via email and flyers throughout business)
 - Post Social Distancing and preventative practices flyers throughout business
- ⚠** *Many states now mandate employers post specific signage; Find your requirements at [ISRI's COVID-19 State Reopening and H&S Updates](#)*

Response to Possible or Positive COVID-19 Test Result

- Conduct a risk assessment for exposure (is there a possible problem area)?
- Implement action plan to stop/minimize additional exposure
- Identify control measures to contain the spread
- Follow [OSHA guidance on discontinuation of isolation for persons with COVID-19](#)