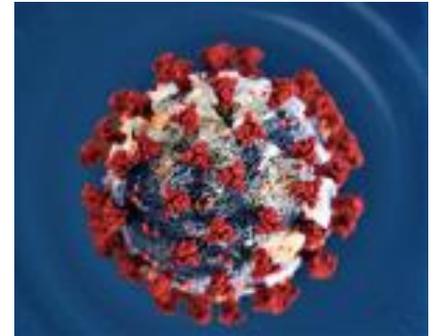


COVID-19: Guidance to Help Recyclers Operate Safely (as of March 21, 2020)

This document is intended to provide guidance to help recyclers operate safely and minimize the potential for exposure to COVID-19. It has been developed based on public information provided by CDC, OSHA, and other expert sources. However, as there is still a lot that is not known about COVID-19, ISRI encourages you to make sure to check both ISRI's COVID-19 resource page on its website (<https://www.isri.org/covid-19-resources>) and the CDC website (<https://www.cdc.gov/coronavirus/2019-ncov/index.html>) often for changes and updates. ISRI will also continue to send updated information directly to all members by email.



Basic Individual Hygiene Practices

The virus is thought to spread mainly from person-to-person.

- Between people who are in close contact with one another (within about 6 feet).
- Through respiratory droplets produced when an infected person coughs or sneezes. These droplets can land in the mouths or noses of people who are nearby or possibly be inhaled into the lungs.

Clean your hands often

- **Wash your hands** often with soap and water for at least 20 seconds especially after you have been in a public place, or after blowing your nose, coughing, or sneezing.
- If soap and water are not readily available, **use a hand sanitizer that contains at least 60% alcohol**. Cover all surfaces of your hands and rub them together until they feel dry.
- **Avoid touching your eyes, nose, and mouth** with unwashed hands.



Cover coughs and sneezes

- Cover your mouth and nose with a tissue when you cough or sneeze or use the inside of your elbow.
- Throw used tissues in the trash.
- Immediately wash your hands with soap and water for at least 20 seconds. If soap and water are not readily available, clean your hands with a hand sanitizer that contains at least 60% alcohol.



Place signs throughout your facility to remind employees, customers and others who may come to the facility of the above Hygiene Practices. The CDC website has numerous posters in PDF format that can be used: <https://www.cdc.gov/handwashing/posters.html>.

General Safety Checklist for Recycling Operations

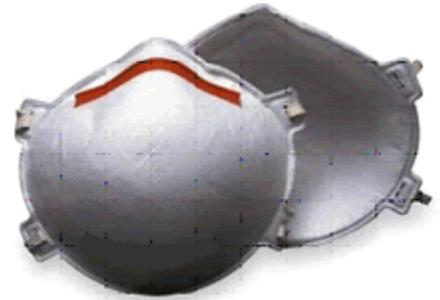
The COVID-19 pandemic requires an assortment of modified procedures and ways of doing business to keep employees, customers and visitors safe. This also provides an opportunity to reinforce existing safety practices, in addition to adapting to new concepts, such as social distancing.

If you already have an **Infectious Disease Response Plan**, utilize that document to guide you through what needs to be done in your operations to keep everyone safe, updated with the considerations contained within this guidance document. If you do not have such a Plan, document the steps you are taking in accordance with the information contained within this guidance document to provide the basics of such a Plan. As all operations are different and decisions are site specific, ISRI is providing the following checklist of items to consider in your specific operation:

1. **Tell all Employees who are sick to stay home.** If someone in their immediate household is sick, or they have otherwise been exposed to someone who is sick, also ask them to stay home. Designate someone within your operation for your employees to call if they are sick or experiencing symptoms of COVID-19 been developed. 
2. **Consider developing procedures for immediately isolating people who have signs and/or symptoms of COVID-19.** Priority should be to retail areas and other points of contact with the public. Move potentially infectious people to a location away from workers, customers, and other visitors. Although most worksites do not have specific isolation rooms, designated areas with closable doors may serve as isolation rooms until potentially sick people can be removed from the worksite.
3. **Consider whether any employees can work remotely.** Consider allowing any employee whose job function can be done remotely to do so, to minimize the number of people who are physically present at your operation.
4. **Keeping Safe Distances.** Current recommendation is that a minimum of 6 feet is maintained between people. Consider what **points of contact** exist between people in your operation and whether changes can be made to avoid contact.
 - a. Look for any opportunities to separate employees within your operation by a minimum of 6 feet
 - b. Consider constructing a flow chart showing the movement of people, material, and documents within your facility. This will help identify areas of interaction and potential exposure.
 - c. Consider staggering breaks for employees
 - d. Consider closing retail operations if exposure cannot be avoided.
 - e. Discourage workers from using other workers' phones, desks, offices, or other work tools and equipment, when possible.
5. **Clean and disinfect frequently touched surfaces daily.** This includes tables, hand-read time clocks, doorknobs, light switches, countertops, handles, desks, phones, keyboards, toilets, faucets, and sinks.
 - a. Consider what parts of your equipment (e.g., controls) and tools (e.g., handles) are exposed and need to be disinfected regularly.

- b. Be sure to sanitize and clean common or high traffic areas frequently. This includes break rooms, kitchens, and reception areas.
 - c. If surfaces are dirty, clean them: Use detergent or soap and water before disinfection.
 - d. The CDC recommends the following options for disinfecting surfaces:
 - Diluting your household bleach.
To make a bleach solution, mix:
 - 5 tablespoons (1/3rd cup) bleach per gallon of water
 - OR
 - 4 teaspoons bleach per quart of waterFollow the manufacturer's instructions for application and proper ventilation. Check to ensure the product is not past its expiration date. Never mix household bleach with ammonia or any other cleanser. Unexpired household bleach will be effective against coronaviruses when properly diluted.
 - Alcohol solutions. Ensure the solution has at least 60% alcohol.
 - Other common EPA-registered household disinfectants. Products with [EPA-approved emerging viral pathogens pdf iconexternal icon](#) claims are expected to be effective against COVID-19 based on data for harder to kill viruses. Follow the manufacturer's instructions for all cleaning and disinfection products (e.g., concentration, application method and contact time, etc.).
6. **Consider how scale tickets, shipping documents, and other paperwork are handled in your operations.** When paperwork, "handle with care," and immediately wash your hands following handling. If your employees use an electronic device, it should be disinfected after a customer has handled it, and the employee should immediately wash his or her hands.
7. **Ensure continued use of all Personal Protective Equipment (PPE)** and make sure that Face shields and protective eyewear are cleaned frequently due to the close proximity of an infection pathway (the eyes).
- a. Provide gloves to all employees
 - b. Have all employees wearing a respirator, met all the OSHA requirements for a respiratory protection program to include initial fit testing? Following is the NIOSH approved list of respirators: <https://www.cdc.gov/niosh/npptl/topics/respirators/factsheets/respsars.html>
 - c. On March 14th, OSHA issued temporary enforcement guidelines on respirator fit testing for healthcare workers, which are to remain in effect until further notice. One of the reasons for the temporary enforcement guidelines stems from the fact that there was a national shortage of N95 masks for healthcare workers prompting many to use surgical masks. Surgical masks do little to protect the employee and are designed to protect the patient from the medical worker. N95 masks, due to their ability to seal around the face, provide protection in both directions.
 - d. The following is a very good YouTube video which covers the requirements for voluntary respirator use in the workplace per the OSHA standard: <https://www.youtube.com/watch?v=QW3bjPkdRzM>. The voluntary use alternative, while it sounds good on the surface, is really not that dissimilar from the full respiratory protection regulation. Additionally, the temporary guidance removes the requirement for annual fit testing but not for the initial fit testing.

- e. If an employer does choose to have a voluntary use program, each employee must receive a copy of appendix D of the standard which can be found at: <https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.134AppD>
- f. The N95 facemask typically has a metal strip at the nose bridge noted above in red. This metal strip needs to be fitted around the nose bridge during the fitting process.



8. **Consider a review of engineering controls** for possible ways to minimize potential exposures. Considerations include:
 - a. Installing high-efficiency air filters
 - b. Increasing ventilation rates in the work environment.
 - c. Installing physical barriers, such as clear plastic sneeze guards.
 - d. Installing a drive-through window for customer service
9. **Document** all the steps you are taking within your operations to keep everyone safe.
 - a. If there are changes you are making to standard processes and practices within your operations to address COVID-19, document those changes and the reason for doing so.
10. **Handling UBCs.**
 - a. Unfortunately, a lot is still not known about how long COVID-19 can live on metal and plastic surfaces. While some have determined that 3 days is the limit, this has not been confirmed and there have been others suggesting it may be as long as a week.¹
 - b. There are a number of options that recyclers can consider:
 - Not accepting UBCs at this time;
 - Put in administrative controls where you accept and hold the material for 3 days or more. Again, the specific duration of time is not known at this time. In addition, employees should keep a safe distance from the customer while UBCs are being weighed; once they are properly weighed or checked in to the company system, the retail scale operator could direct the customer to a designated area where the material will be quarantined for a safe period of time; or
 - Suit up the retail worker in nitrile gloves, leather gloves, long sleeves, mask, etc. However, these items (gloves & masks) are quickly becoming scarce, which will limit this option.
11. **Constantly remind employees to stay focused.** This is especially important for line workers and drivers on the road. With all that is going on now, distraction and fatigue from stress and worry is challenge for everyone.
12. **Conserve safety supplies.** We will likely be challenged to find additional safety supplies in the weeks ahead, so consider talking to employees about the importance of treating all safety supplies with extra care.

¹ As for the life of the virus on surfaces, this study from NEJM - <https://www.nejm.org/doi/full/10.1056/NEJMc2004973> and this one from the NIH - <https://www.nih.gov/news-events/news-releases/new-coronavirus-stable-hours-surfaces> show that it can be stable for hours and/or days depending on the surface (copper, plastic, stainless, cardboard, etc.).

Specific Guidance for Truck Operations

In the interest of combating the threat of COVID-19, hand washing, social distancing, and regularly wiping down the inside of the vehicle is a good start for a driver. Yet, many additional risks and problems will still need to be addressed.

- **Avoid Contact/Practice Social Distancing:**

When at a shipper, receiver, restaurant, or service facility, drivers need to know to maintain a safe distance from other people (6 feet or more). They should also avoid touching anything they are not required to touch. When leaving a facility, drivers should wash their hands (20-seconds with warm soapy water) before getting in the vehicle.

Germs are spread through contact with droplets, either directly or droplets that were left on a surface, so drivers, in general, should always wash their hands immediately before getting in their vehicles. This should help drivers avoid contaminating the surfaces in the cab that they routinely touch. It does drivers no good to be disciplined about washing their hands if they don't avoid contaminating the inside of the vehicle.

- **Handling Shipping Documents and Other Paperwork:**

When handling shipping documents and other paperwork, drivers should "handle with care," and immediately wash their hands. If your drivers use an electronic delivery device, it should be disinfected after a customer has handled it, and the driver should immediately wash his or her hands. Another possibility is having the driver sign the electronic device on the customer's behalf if that is possible in your operating environment.

- **Restaurants and Food:**

Drivers need to give more thought than usual to a basic need: food. With restaurants all over the country closing, drivers are finding it difficult to find a meal. Many of the restaurants used by drivers are now carry-out only, but drivers need to know which restaurants are still providing food. Providing a tool for drivers to share information on where food is available might be something to consider. Also, drivers should try to get food only at reputable restaurants. One advantage of large chain restaurants (fast food) is that they typically have well-established sanitizing policies. Additionally, to avoid parking issues a driver may want to consider a large chain restaurant at a truck stop.

- **Obtaining a DOT Physical/Renewing a commercial driver's license (CDL):**

While not a day-to-day concern, obtaining a DOT medical exam or renewing a CDL may become an issue. As the medical industry and government agencies become stressed, it will become harder to get an appointment for a physical or to renew a CDL. Because of this, drivers and carriers need to think ahead, schedule appointments well in advance, and be prepared for delays and reschedules. Also, call ahead of the appointment to check on protocols in place for social distancing at the location where license renewal takes place to help avoid exposure.

- **Hours-of-Service and Dealing with Fatigue:**

There is a temporary exemption related to COVID-19 that allows drivers to ignore the limits and logging requirements. However, this exemption is narrowly focused, as it only applies to drivers hauling in direct support of an emergency related to the outbreak. This includes hauling necessary supplies, restocking empty grocery stores, and hauling supplies for temporary housing set up due to the virus.

Even if not operating under the emergency declaration, drivers can be under pressure to work as many hours as possible. However, carriers must keep the risk of driver fatigue as a top priority. In addition to being less safe on the road, a person suffering from fatigue will generally be more susceptible to infection. If a driver becomes fatigued, allow the driver to rest, no matter what the operational circumstance.

- **Reassigning Equipment:**

Finally, one consideration is moving drivers from vehicle to vehicle. If one driver is infected and has been in four different vehicles, you now have four vehicles that need to be disinfected and at least four other drivers that have been exposed. Consideration should be given to going to an assigned vehicle model and developing in-house procedures for disinfecting vehicles after every shift when drivers are assigned a different vehicle.

Mental Health

During this time, the mental wellbeing of employees is particularly important. It is a very stressful time for everyone. The CDC has a very good website with resources to help people at home and at work manage stress related to COVID-19 that can be found at <https://www.cdc.gov/coronavirus/2019-ncov/prepare/managing-stress-anxiety.html>.

If you have an **Employee Assistance Program (EAP)**, it is important to remind employees as to its availability and how to access it. EAPs are

If you do not have an EAP, there are many good resources for reducing anxiety and helping people reduce stress during this time, including:

- National Alliance on Mental Health: <https://www.nami.org/getattachment/Press-Media/Press-Releases/2020/COVID-19-and-Mental-Illness-NAMI-Releases-Importan/COVID-19-Updated-Guide-1.pdf?lang=en-US>
- American Psychological Association: <https://www.apa.org/practice/programs/dmhi/research-information/pandemics>
- World Health Organization: https://www.who.int/docs/default-source/coronaviruse/mental-health-considerations.pdf?sfvrsn=6d3578af_8
- Mental Health America: <https://mhanational.org/covid19>

And remember, taking care of your own emotional health during an emergency, such as this one, will help you think clearly and react to the urgent needs to protect yourself, your employees, and your family!!

Additional Resources:

- Centralized updates from ISRI: <https://www.isri.org/covid-19-resources>
- The latest updates from the CDC: <https://www.cdc.gov/coronavirus/2019-nCoV/index.html>
 - Interim Guidance for Preventing the Spread of COVID-19 in Homes and Residential Communities: www.cdc.gov/coronavirus/2019-ncov/hcp/guidance-prevent-spread.html
- From OSHA:
 - *Guidance on Preparing Workplaces for COVID-19*: <https://www.osha.gov/Publications/OSHA3990.pdf>
 - OSHA's resource page on COVID-19: <https://www.osha.gov/SLTC/covid-19/>
- The U.S. Department of Homeland Security's Pandemic Planning resources: <https://www.ready.gov/pandemic>

And, of course, please reach out to any of ISRI's Safety Staff with questions about any of the items in this document, or any other questions you might have regarding safety and the recycling industry:

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