

# **ISRI Town Hall: Handling EHS Issues During COVID-19 Pandemic**

## **Pandemic Update**

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Program Open

Welcome

EHS Introduction & COVID-19 update

ISRI Resource Overview Update

Summary of Critical Dates

COVID-19 & Outreach Services

Safety Stand-Down Day & Virtual ISEC

Transportation Update

Environmental Issues

Q&A/Lessons Learned

Wrap Up

Chuck Carr

Robin Wiener/Brian Shine

Scott Wiggins

Scott Wiggins

Scott Wiggins

Tony Smith

Tony Smith

Commodor Hall

David Wagger

Chuck Carr/\*Rebecca Turner

Robin Wiener/Brian Shine

## Recyclers Guide for Safe Operations

- **ISRI COVID-19 posters (Spanish version available this week)**
- **COVID-19 Exposure Prevention Preparedness and Response Plan (17 pp, MS Word)**
- **ISRI Safety Alert on Case Recordability**

# Issues to Be Determined

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- 1. Economic impact of COVID-19 and SREA**
- 2. OSHA Post Pandemic Enforcement of Standards (Respiratory Protection)**
- 3. OSHA Post Pandemic Response to Employee Complaints**
- 4. Return To Work Protocols (see April 13 update)**

# Epidemiologic Scenarios

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- 1.No known cases
- 2.Confirmed cases, but no **known community transmission**
- 3.Confirmed cases, limited community transmission
- 4.Confirmed cases, widespread community transmission

# Critical EHS Dates 2020

- April 17, 2020 **Transportation Town Hall (2 PM - 3 PM)**
- May 12, 2020 **OSHA Whistleblower Stakeholder Meeting (Call-in only)**
- May 15, 2020 **Deadline for ISRI Transportation Safety & COSE Occupational Safety Awards**
- May 15, 2020 **\$10 Price Increase on SREA Reports**
- June 23, 2020 **Medical Surveillance Offered to Employees Exposed to Respirable Silica > Action Level**
- June 17, 2020 **ISRI Safety Stand-Down Day/Virtual ISEC Week (June 15 - 19)**
- August 10 – 16, 2020 **OSHA Safe + Sound Week**
- September 7, 2020 **Dust Hazard Analysis Deadline**
- November 3 – 10, 2020 **Drowsy Driving Prevention Week – [drowsydriving .org](http://drowsydriving.org)**
- December 1 – 31, 2020 **Holiday Season / Drunk Driving Campaign – [NHTSA.ORG](http://NHTSA.ORG)**

<https://www.cdc.gov/coronavirus/2019-ncov/hcp/return-to-work.html>

Return to work criteria updated April 13, 2020

<https://www.cdc.gov/coronavirus/2019-ncov/community/critical-workers/implementing-safety-practices.html>

Interim guidelines for essential infrastructure workers to return to work following suspected exposure.

<https://www.isri.org/docs/default-source/covid19/covid-19-exposure-prevention-preparedness-and-response-plan.docx?sfvrsn=0>

COVID-19 Exposure Prevention Preparedness and Response Plan (17 pp, MS Word)

<https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/businesses-employers.html>

Resources for businesses and employers

<https://youtu.be/28ZLRQOKHFc>

CDC update by Dr. Jay Butler, MD April 6, 2020

<https://www.osha.gov/enforcement/directives/nep>

Link to OSHA's current list of national emphasis programs with additional link to regional local emphasis programs

[https://www.cdc.gov/niosh/npptl/topics/respirators/disp\\_part/n95list1-a.html](https://www.cdc.gov/niosh/npptl/topics/respirators/disp_part/n95list1-a.html)

NIOSH approved list of N95 respirators by manufacturer

<https://www.cdc.gov/coronavirus/2019-ncov/hcp/respirators-strategy/index.html>

Strategies for Optimizing the Supply of N95 Respirators

<https://www.osha.gov/memos/2020-03-14/temporary-enforcement-guidance-healthcare-respiratory-protection-annual-fit>

Waiver of annual fit testing requirement for N95 respirators (but not waiver of initial fit testing)



## Sources of N95 Respirators

**Q2. Can respirators approved under standards used in other countries, such as KN95, be used in the US during the COVID-19 pandemic?**

<https://www.fda.gov/medical-devices/personal-protective-equipment-infection-control/faqs-shortages-surgical-masks-and-gowns>

**March 27, 2020, EUA for Non-NIOSH-Approved Imported FFRs** <https://www.fda.gov/news-events/press-announcements/coronavirus-covid-19-update-fda-takes-action-help-increase-us-supply-ventilators-and-respirators>

**April 3 2020, EUA for non-NIOSH approved FFRs manufactured in China:**  
<https://www.fda.gov/media/136664/download>

**Appendix A List of FFRs**  
<https://www.fda.gov/media/136663/download>

# Certification Audits in the Time of COVID

1. Keeping certificates relevant and up-to-date is the first priority after the health and safety of all stakeholders!
2. Virtual audits can be conducted and are being encouraged;
  - A. Surveillance audits will (for the most part) be honored and not require follow-up in person;
  - B. Re-Certification audits may require in person follow up;
3. New certifications may occur where necessary in a virtual format, but will almost definitely require in person, on-site follow-up;
4. Certification Bodies have been given discretion regarding use of virtual tools, ANAB is providing oversight and retains the ability to not accept the CBs recommendation;
5. When the crisis is behind us, there will be chaos and auditors will be BUSY!

\*\*\*In general, our industry and the schemes that apply have been accommodating regarding changes and use of virtual options. If you hold standards that are associated with other industries (healthcare, aerospace, food, etc) these assumptions may not apply!

# **ISRI Town Hall: Handling EHS Issues During COVID-19 Pandemic**

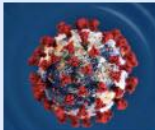
## **Safety Outreach**

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Tony Smith  
Director of Safety Outreach  
Institute of Scrap Recycling Industries (ISRI)

- COVID-19 Exposure Prevention Preparedness and Response Plan
- Basic Individual Hygiene Practices, Safety Guidelines, Mental Health Guidance, Posters, and Videos
- ISRI's State and Local Policy Dashboard and Resources <https://www.isri.org/covid-19/covid-19-state-business-resource>

**Guidance to Help Recyclers Operate Safely**  
COVID-19



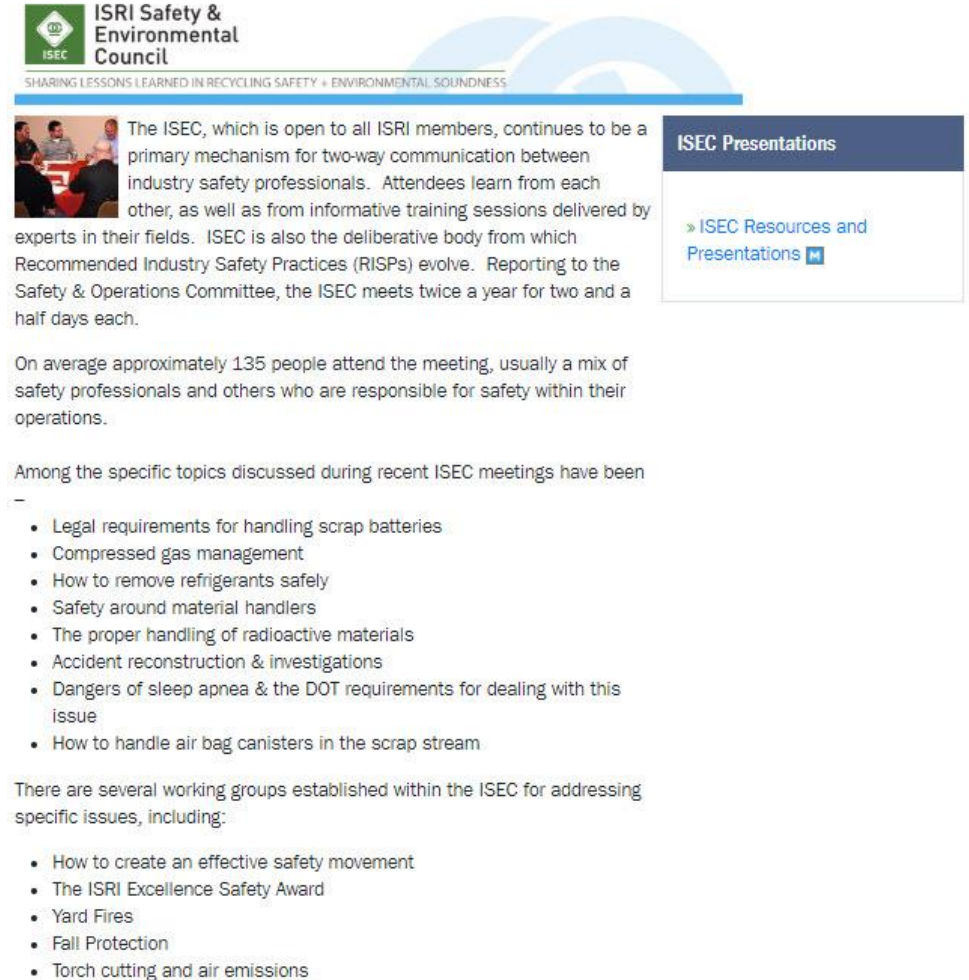
This document is intended to provide guidance to help recyclers operate safely and minimize the potential for exposure to COVID-19. It has been developed based on public information provided by CDC, OSHA and other expert sources. However, as there is still a lot that is not known about COVID-19, ISRI encourages you to make sure to check both ISRI's COVID-19 resource page on its [website](#) and the [CDC website](#) often for changes and updates. ISRI will also continue to send updated information directly to all members by email.

Basic Individual Hygiene Practices	COVID-19 Safety Guidelines
<p>The virus is thought to spread mainly from person-to-person.</p> <ul style="list-style-type: none"> <li>• Between people who are in close contact with one another (within about 6 feet).</li> <li>• 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.</li> </ul> <p><b>Clean your hands often</b></p> <ul style="list-style-type: none"> <li>• <b>Wash your hands</b> 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.</li> <li>• If soap and water are not readily available, <b>use a hand sanitizer that contains at least 60% alcohol</b>. Cover all surfaces of your hands and rub them together until they feel dry.</li> <li>• <b>Avoid touching your eyes, nose, and mouth</b> with unwashed hands.</li> </ul>  <p><b>Cover coughs and sneezes</b></p> <ul style="list-style-type: none"> <li>• Cover your mouth and nose with a tissue when you cough or sneeze or use the inside of your elbow.</li> <li>• Throw used tissues in the trash.</li> <li>• 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.</li> </ul> <p>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: <a href="https://www.cdc.gov/handwashing/posters.html">https://www.cdc.gov/handwashing/posters.html</a>.</p>	<ul style="list-style-type: none"> <li> <a href="#">ISRI Safety Guidelines COVID 19 (English)</a></li> <li> <a href="#">ISRI Safety Guidelines COVID 19 (Spanish)</a></li> </ul>
<p><b>COVID-19 Safety Posters</b></p> <p>Slow the spread! ISRI developed these COVID-19 safety and readiness tips into a displayable format for members to use in break rooms, offices, and shops. <a href="#">Download</a> and send to your local print shop.</p> 	

<https://www.isri.org/covid-19/covid-19-guidance-to-help-recyclers-operate-safely>

- Mobile Equipment Train-the-Trainer classes
- OSHA Susan Harwood Grant Hazard Recognition classes
- Safety Blueprints & Transportation Assessments
- Other

- Monday June 15, 2020 – Safety Leadership at All Levels of the Company
- Tuesday June 16, 2020 – Perspectives on fire issues from the insurer and from the field level expert
- Wednesday June 17, 2020 – ISRI Safety Stand Down Day
- Thursday June 18, 2020 – Current Environmental Issues
- Friday June 19, 2020 – Transportation Safety Issues from a Service Provider’s point of view



**ISRI Safety & Environmental Council**  
SHARING LESSONS LEARNED IN RECYCLING SAFETY + ENVIRONMENTAL SOUNDNESS

**ISEC Presentations**

» [ISEC Resources and Presentations](#)

The ISEC, which is open to all ISRI members, continues to be a primary mechanism for two-way communication between industry safety professionals. Attendees learn from each other, as well as from informative training sessions delivered by experts in their fields. ISEC is also the deliberative body from which Recommended Industry Safety Practices (RISPs) evolve. Reporting to the Safety & Operations Committee, the ISEC meets twice a year for two and a half days each.

On average approximately 135 people attend the meeting, usually a mix of safety professionals and others who are responsible for safety within their operations.

Among the specific topics discussed during recent ISEC meetings have been

- Legal requirements for handling scrap batteries
- Compressed gas management
- How to remove refrigerants safely
- Safety around material handlers
- The proper handling of radioactive materials
- Accident reconstruction & investigations
- Dangers of sleep apnea & the DOT requirements for dealing with this issue
- How to handle air bag canisters in the scrap stream

There are several working groups established within the ISEC for addressing specific issues, including:

- How to create an effective safety movement
- The ISRI Excellence Safety Award
- Yard Fires
- Fall Protection
- Torch cutting and air emissions

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## Transportation Safety Update

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Transportation Safety Director  
Institute of Scrap Recycling Industries (ISRI)

- **FMCSA Declaration, Date 03/13/20:** DOT issued a national emergency declaration for commercial vehicles delivering relief in response to the COVID-19 (HOS regulatory relief, effective until the termination of the emergency or until April 12, 2020).
- **FMCSA Declaration, Date 03/18/20:** DOT issued an expanded declaration to include immediate precursor raw materials, i.e. paper, plastics, and alcohol to be used for the manufacture of essential items, fuel, and persons necessary to provide other medical or emergency services.
- **FMCSA Guidance, Date 03/23/20:** DOT provided guidance on drug and alcohol testing e.g., whenever possible. **On 03/25/20, FMCSA provided additional Guidance** on Disruptions to Drug and Alcohol Testing in response to COVID-19, in effect until June 30, 2020 (specifically addressed all types of testing for CDL drivers, and refusal to test).



# COVID-19 Implications for DOT Enforcement

- **FMCSA Guidance Date 03/24/20:** DOT granted waivers for expired CDLs, CLPs, and medical cards. The waivers are effective from March 20 – June 30, 2020.
- **ISRI Petition for Consideration Date 03/25/20:** ISRI submitted a petition of consideration to the FMCSA requesting emergency relief for the transportation of ferrous and non-ferrous metals as an essential item to be included in emergency declaration for commercial vehicles delivering relief in response to COVID-19.
- **FMCSA Declaration Date 04/09/20:** DOT issued an extension and an expansion to the declaration. Extending the exemption through May 15, 2020 and expanding the relief to cover liquefied gases to be used in refrigeration or cooling systems.
- **ATA Hub Update 04/01/20:** In response to the COVID-19 Outbreak, the ATA is tracking the following issues across the 50 states e.g., Closures of state driver license agencies, CDL expiration date extensions, new CLP and CDL issuance / testing restrictions, increased size and weight limits and rest area availability. <https://www.trucking.org/COVID19/state-declarations>

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## **Environmental Aspects**

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- U.S. EPA Memo dated 3/26/2020, effective retroactively 3/13/2020
- “temporary policy regarding EPA enforcement of environmental legal obligations during” COVID-19 pandemic
- Federal policy for U.S. EPA to exercise “enforcement discretion” if facility operators follow the policy.
- State authorities may develop their own enforcement policy, which may differ.
  - Check with your state authority for its enforcement policy.
- End of Temporary Federal Policy not known yet

- Temporary Federal Policy does **not**...
  - apply to criminal violations, Superfund or RCRA corrective actions, or imports.
  - apply to noncompliance **unrelated** to COVID-19.
  - provide automatic forgiveness of noncompliance for qualifying activities.
  - envision “catch-up” compliance by facility operators that received enforcement discretion for compliance activities that were missed.
- To benefit from Temporary Federal Policy, facility operators should...
  - “make every effort to comply with their environmental compliance obligations”.
  - use existing regulatory procedures to report noncompliance caused by COVID-19.
  - document and maintain information about noncompliance caused by COVID-19.

# Temporary Reporting Advisory for Stormwater

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- U.S. EPA Memo dated 3/31/2020 (effective 3/13/2020) to States and EPA Regions
- Reporting advisory on Federal and State NPDES (e.g., stormwater) reporting requirements as supplement to Temporary Federal Policy and its requirements
- Stormwater monitoring, sampling, and reporting requirements at issue
- When submitting electronic reports,
  - use No Data Indicator (NODI) Code Z (COVID-19) if available, otherwise Code K (Natural Disaster).
  - add “COVID-19” as comment to Discharge Monitoring Report (DMR) form.
- Waivers from electronic reporting due to COVID-19 available from U.S. EPA / State

# Temporary Reporting Advisory for Stormwater

**Table 2 – Example Scenarios Created by COVID-19 Pandemic**

Scenario	Recommended Response by the Permittee
1) A permittee can report, but not electronically	Request a waiver from electronic reporting and report on paper
2) A permittee is not able to sample or monitor, but can report electronically	Report as required; use applicable NODI code where needed; include comment on DMR form
3) A laboratory is not available to complete analyses of samples	
4) A permittee is not able to sample, monitor and report	Follow criteria set forth in the Temporary Policy and report when possible, which might include use of NODI codes with necessary comments and attachments.
5) No authorized official is available to sign a required form or report	See 4). In lieu of report with actual signature, a scanned version should be sent in accordance with existing procedures to expedite processing.

# **QUESTIONS & ANSWERS**

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## **Lessons Learned**

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