**COVID-19 Exposure Prevention, Preparedness,**

**and Response Plan for Recyclers**

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The purpose of this plan is to outline the steps that every employer and employee can take to reduce the risk of exposure to COVID-19. The plan describes how to prevent worker exposure to coronavirus, protective measures to be taken on the jobsite, personal protective equipment and work practice controls to be used, cleaning and disinfecting procedures, and what to do if a worker becomes sick.[[1]](#footnote-1)

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**[INSERT COMPANY NAME]** takes the health and safety of our employees very seriously. We all must remain vigilant in preventing the spread of the coronavirus or “COVID-19,” a respiratory disease caused by the SARS- CoV-2 virus. In order to be safe and maintain operations, we have developed this COVID-19 Exposure Prevention, Preparedness, and Response Plan to be implemented throughout the Company and at all of our jobsites. We have also identified a team of employees to monitor available U.S. Center for Disease Control and Prevention (“CDC”) and Occupational Safety and Health Administration (“OSHA”) guidance on the virus.

Worker risk of occupational exposure to SARS-CoV-2, the virus that causes COVID-19, during an outbreak may vary from very high to high, medium, or lower (caution) risk. The level of risk depends in part on the industry type, need for contact within 6 feet of people known to be, or suspected of being, infected with SARS-CoV-2, or requirement for repeated or extended contact with persons known to be, or suspected of being, infected with SARS-CoV-2. To help employers determine appropriate precautions, OSHA has divided job tasks into four risk exposure levels: very high, high, medium, and lower risk. See OSHA Protecting Workers: Guidance on Mitigating and Preventing the Spread of COVID-19 in the Workplace - [OSHA Guidance](https://www.osha.gov/coronavirus/safework), Updated August 2021.

This Plan is based on currently available information from the CDC and OSHA, and is subject to change based on further information provided by the CDC, OSHA, and other public officials. The Company may also amend this Plan based on operational needs.

**I. Responsibilities of Managers and Supervisors**

All managers and supervisors must be familiar with this Plan and be ready to answer questions from employees. Managers and supervisors must set a good example by following this Plan at all times. This involves practicing good personal hygiene and jobsite safety practices to prevent the spread of the virus. Managers and supervisors must encourage this same behavior from all employees.

**II. Responsibilities of Employees**

We are asking every one of our employees to help with our prevention efforts while at work. In order to minimize the spread of COVID-19 at our jobsites, we all must play our part. As set forth below, the Company has instituted various housekeeping, social distancing, and other best practices at our jobsites. All employees must follow these. In addition, employees are expected to report to their managers or supervisors if they are experiencing signs or symptoms of COVID-19, as described below. If an employee is unable to come to work due to COVID-19 they should follow normal call-in procedures, or alternate procedures that may have been put in place for this period of time. If you have a specific question about this Plan or COVID-19, please ask your manager or supervisor. If they cannot answer the question, please contact **[ADD TITLE HERE]**.

OSHA and the CDC has provided the following control and preventative guidance to all workers, regardless of exposure risk:

* Frequently wash your hands with soap and water for at least 20 seconds. When soap and running water are unavailable, use an alcohol-based hand rub with at least 60% alcohol.
* Avoid touching your eyes, nose, or mouth with unwashed hands.
* Follow appropriate respiratory etiquette, which includes covering for coughs and sneezes.
* Avoid close contact with people who are sick.
* Consider getting a COVID-19 vaccine.

In addition, employees must familiarize themselves with the symptoms of COVID-19:

* Coughing
* Fever
* Fatigue
* New loss of taste or smell
* Shortness of breath, difficulty breathing; and
* Early symptoms such as chills, body aches, sore throat, headache, diarrhea, nausea/vomiting, and runny nose.

If you develop a fever and symptoms of respiratory illness, such as cough or shortness of breath, DO NOT GO TO WORK and call your healthcare provider right away. Likewise, if you come into close contact with someone showing these symptoms, call your healthcare provider right away.

**III. Job Site Protective Measures**

The Company has instituted the following protective measures at all jobsites.

*A. General Safety Guidance*

* Any employee/contractor/visitor showing symptoms of COVID-19 will be asked to leave the jobsite and return home.
* Safety meetings should be socially distanced, if possible. If safety meetings are conducted in-person, practice covid-19 safety protocols.
* Employees will be encouraged to stagger breaks and lunches, if practicable, to reduce the size of any group at any one time.
* Employees are encouraged to limit the need for respirator use, by using engineering and work practice controls to minimize dust. Such controls include the use of water delivery and dust collection systems, as well as limiting exposure time.
* Employees are encouraged to minimize ride-sharing among the unvaccinated or otherwise at-risk workers.
* If practicable, employees should use/drive the same truck or piece of equipment every shift. Employee should wipe down controls of equipment before operating.
* In lieu of using a common source of drinking water, such as a cooler, employees should use individual water bottles.

**[INSERT ADDITIONAL PRECAUTIONS THAT MAY BE SPECIFIC TO YOUR BUSINESS/OPERATIONS/PROJECTS] *Additional Facility Safety Precautions Include:***

*B. Workers entering Occupied Buildings*

* When employees perform operations and maintenance activities within occupied areas, office buildings, and other establishments, these work locations present unique hazards with regards to COVID-19 exposures. All such workers should evaluate the specific hazards when determining best practices related to COVID-19.
* During this work, employees should sanitize the work areas upon arrival, throughout the workday, and immediately before departure. The Company will provide alcohol-based wipes, sanitizing spray, or other means for this purpose.
* Employees should ask other occupants to keep a personal distance of six (6) feet at a minimum. Workers should wash or sanitize hands immediately before starting and after completing the work.

*C. Job Site Visitors*

* The number of visitors to the job site, including the offices or operations and maintenance areas, will be limited to only those necessary for the work.
* All visitors will be screened in advance of arriving on the job site. If the visitor answers “yes” to any of the following questions, he/she should not be permitted to access the jobsite:
  + Have you been confirmed positive for COVID-19?
  + Are you currently experiencing, or recently experienced, any acute respiratory illness symptoms such as fever, cough, or shortness of breath?
  + Have you been in close contact with any persons who has been confirmed positive for COVID-19?
  + Have you been in close contact with any persons who have traveled and are also exhibiting acute respiratory illness symptoms?
* Site deliveries will be permitted but should be properly coordinated in line with the employer’s minimal contact and cleaning protocols.

*D. Personal Protective Equipment and Work Practice Controls*

* In addition to regular PPE for workers engaged in various tasks (fall protection, hard hats, hearing protection), employers will also provide:
  + Gloves: The type of glove worn should be appropriate to the task. If gloves are not typically required for the task. Employees should avoid sharing gloves.
  + Eye protection: Eye protection should be worn at all times while on-site.
  + Provide workers with face coverings or surgical masks, as appropriate, unless their work task requires a respirator or other PPE.
* Institute a rigorous housekeeping program to reduce dust levels on the jobsite.

**IV. Job Site Cleaning and Disinfecting**

The Company has instituted regular housekeeping practices, which includes cleaning and disinfecting frequently used tools and equipment, and other elements of the work environment, where possible. Employees should regularly do the same in their assigned work areas.

* Jobsite trailers and break/lunchroom areas should be cleaned at least once per day. Employees performing cleaning will be issued proper personal protective equipment (“PPE”), such as nitrile, latex, or vinyl gloves and gowns, as recommended by the CDC.
* Any trash collected from the jobsite must be changed frequently by someone wearing nitrile, latex, or vinyl gloves.
* Any portable jobsite toilets should be cleaned by the leasing company regularly. The Company will ensure that hand sanitizer dispensers are always filled. Frequently touched items (i.e. door pulls and toilet seats) will be disinfected frequently.
* Vehicles and equipment/tools should be cleaned at least once per day and before change in operator or rider.
* The Company will ensure that any disinfection shall be conducted using one of the following:
  + Common EPA-registered household disinfectant;
  + Alcohol solution with at least 60% alcohol; or
  + Diluted household bleach solutions (these can be used if appropriate for the surface).
* The Company will maintain Safety Data Sheets of all disinfectants used on site.

**[INSERT ADDITIONAL CLEANING REQUIREMENTS IF YOU USE HAZARDOUS CHEMICALS ON SITE] *Additional Cleaning and Disinfection Guidelines Include:***

**V. Jobsite Exposure Situations**

* **Employee Exhibiting COVID-19 Symptoms**

If an employee exhibits COVID-19 symptoms, the employee must remain at home until he or she is symptom free for 72 hours (3 full days) without the use of fever-reducing or other symptom-altering medicines (e.g., cough suppressants). The Company may similarly require an employee that reports to work with symptoms to return home until they are symptom free for 72 hour (3 full days). To the extent practical, employees are required to obtain a doctor’s note clearing them to return to work.

* **Employee Tests Positive for COVID-19**

An employee that tests positive for COVID-19 will be directed to self-quarantine away from work. Employees that test positive and are symptom free may return to work when the designated number of days set forth by the employer have passed since the date of his or her first positive test, and they have not had a subsequent illness. Employees that test positive and are directed to care for themselves at home may return to work when: (1) at least 72 hours (3 full days) have passed since recovery;[[2]](#footnote-2) and (2) at least fourteen (14) days have passed since symptoms first appeared. Employees that test positive and have been hospitalized may return to work when directed to do so by their medical care provider. The Company may require an employee to provide documentation clearing their return to work.

* **Employee Has Close Contact with a Tested Positive COVID-19 Individual**

Employees that have come into close contact with a confirmed-positive COVID-19 individual (co-worker or otherwise), will be directed to self-quarantine for 14 days from the last date of close contact with the carrier, unless they have been fully vaccinated. Close contact is defined as six (6) feet for a cumulative total of 15 minutes or more over a 24-hour period of time.

Employees who are fully vaccinated do NOT need to quarantine after contact with someone who had COVID-19 unless they have symptoms. However, fully vaccinated employees should get tested 3-5 days after their exposure, even if they don’t have symptoms and wear a mask indoors in public for 14 days following exposure or until their test result is negative.

(See CDC Guidance - [Quarantine & Isolation](https://www.cdc.gov/coronavirus/2019-ncov/your-health/quarantine-isolation.html))

**VI. OSHA Recordkeeping**

If a confirmed case of COVID-19 is reported, the Company will determine if it meets the criteria for recordability and reportability under OSHA’s recordkeeping rule. (see - [Recording Workplace Exposures to COVID-19](https://www.osha.gov/coronavirus/standards)) OSHA requires general industry employers to record work-related injuries and illnesses that meet certain severity criteria on the OSHA 300 Log, as well as complete the OSHA Form 301 (or equivalent) upon the occurrence of these injuries. For purposes of COVID-19, OSHA also requires employers to report to OSHA any work-related illness that (1) results in a fatality, or (2) results in the in-patient hospitalization of one or more employee. “In-patient” hospitalization is defined as a formal admission to the in-patient service of a hospital or clinic for care or treatment.

OSHA has made a determination that COVID-19 should *not* be excluded from coverage of the rule – like the common cold or the seasonal flu – and, thus, OSHA is considering it an “illness.” However, OSHA has stated that only confirmed cases of COVID-19 should be considered an illness under the rule. Thus, if an employee simply comes to work with symptoms consistent with COVID-19 (but not a confirmed diagnosis), the recordability analysis would not necessarily be triggered at that time.

If an employee has a confirmed case of COVID-19, the Company will conduct an assessment of any workplace exposures to determine if the case is work-related. Work-relatedness is presumed for illnesses that result from events or exposures in the work environment, unless it meets certain exceptions. One of those exceptions is that the illness involves signs or symptoms that surface at work but result solely from a non-work-related event or exposure that occurs *outside* of the work environment. Thus, if an employee develops COVID-19 *solely* from an exposure outside of the work environment, it would *not* be work-related, and thus not recordable.

The Company’s assessment will consider the work environment itself, the type of work performed, risk of person-to-person transmission given the work environment, and other factors such as community spread. Further, if an employee has a confirmed case of COVID-19 that is considered work-related, the Company will report the case to OSHA if it results in a fatality within 30 days or an in-patient hospitalization within 24-hours of the exposure incident occurring.

**VII. Confidentiality/Privacy**

Except for circumstances in which the Company is legally required to report workplace occurrences of communicable disease, the confidentiality of all medical conditions will be maintained in accordance with applicable law and to the extent practical under the circumstances. When it is required, the number of persons who will be informed of an employee’s condition will be kept at the minimum needed not only to comply with legally-required reporting, but also to assure proper care of the employee and to detect situations where the potential for transmission may increase. A sample notice to employees is attached to this Plan. The Company reserves the right to inform other employees that a co-worker (without disclosing the person’s name) has been diagnosed with COVID-19 if the other employees might have been exposed to the disease so the employees may take measures to protect their own health.

**COVID-19 Checklist for Employers and Employees**

**Know the Symptoms of COVID-19**

* Coughing, fever, shortness of breath, new loss of taste or smell and difficulty breathing.
* Early symptoms may include chills, body aches, sore throat, headache, diarrhea, nausea/vomiting, and runny nose. If you develop a fever and symptoms of respiratory illness, DO NOT GO TO WORK and call your health-care provider immediately.

**Employer Responsibilities**

* Develop a COVID-19 Exposure Action Plan.
* Access to the job site and work trailer will be limited to only those necessary for the work.
* All visitors will be pre-screened to ensure they are not exhibiting symptoms.
* Employees, contractors, and visitors will be asked to leave the jobsite and return home if they are showing symptoms.
* Provide hand sanitizer and maintain Safety Data Sheets of all disinfectants used on site.
* Provide protective equipment (PPE) to any employees assigned cleaning/disinfecting tasks.
* Talk with business partners about your response plans. Share best practices with other businesses in your communities (especially those in your supply chain), chambers of commerce, and associations to improve community response efforts.

**Employee Responsibilities**

* Become familiar with the Exposure Action Plan and follow all elements of the Plan.
* Maintain social distance practice at all times.
* Practice good hygiene: wash hands with soap and water for at least 20 seconds. If these are not available, use alcohol-based hand rub with at least 60% alcohol. Avoid touching your face, eyes, food, etc. with unwashed hands.

**Cleaning/Disinfecting Job Sites and Other Protective Measures**

* + Clean and disinfect frequently used tools and equipment on a regular basis. This includes other elements of the jobsite where possible. Employees should regularly do the same in their assigned work areas.
* Clean shared spaces such as trailers and break/lunchrooms at least once per day.
* Disinfect shared surfaces (door handles, machinery controls, etc.) on a regular basis.
* Avoid sharing tools with co-workers. If not, disinfect before and after each use.
* Arrange for any portable job site toilets be cleaned by the leasing company at least twice per week and disinfected on the inside.
* Trash collected from the jobsite must be changed frequently by someone wearing gloves.

**Personal Protective Equipment and Alternate Work Practice Controls**

* Provide and wear the proper PPE.
* Keep the dust down by using engineering and work practice controls, specifically through the use of water delivery and dust collection systems.

**COVID-19 Toolbox Talk**

**What is COVID-19?**

The novel coronavirus, COVID-19 is one of seven types of known human coronaviruses. COVID-19, like the MERS and SARS coronaviruses, likely evolved from a virus previously found in animals. The remaining known coronaviruses cause a significant percentage of colds in adults and children, and these are not a serious threat for otherwise healthy adults.

Patients with confirmed COVID-19 infection have reportedly had mild to severe respiratory illness with symptoms such as fever, cough, and shortness of breath.

**How is COVID-19 Spread?**

COVID-19, like other viruses, can spread between people. Infected people can spread COVID-19 through their respiratory secretions, especially when they cough or sneeze. According to the CDC, spread from person-to-person is most likely among close contacts (about 6 feet). Person-to-person spread is thought to occur mainly *via* respiratory droplets produced when an infected person coughs or sneezes, like how influenza and other respiratory pathogens spread. These droplets can land in the mouths or noses of people who are nearby or possibly be inhaled into the lungs. It is currently unclear if a person can get COVID-19 by touching a surface or object that has the virus on it and then touching their own mouth, nose, or possibly their eyes.

In assessing potential hazards, employers should consider whether their workers may encounter someone infected with COVID-19 in the course of their duties. Employers should also determine if workers could be exposed to environments (e.g., worksites) or materials (e.g., laboratory samples, waste) contaminated with the virus.

Depending on the work setting, employers may also rely on identification of sick individuals who have signs, symptoms, and/or a history of travel to COVID-19-affected areas that indicate potential infection with the virus, in order to help identify exposure risks for workers and implement appropriate control measures.

**COVID-19 Prevention and Work Practice Controls:**

Worker Responsibilities

* Frequently wash your hands with soap and water for at least 20 seconds. When soap and running water are unavailable, use an alcohol-based hand rub with at least 60% alcohol. Always wash hands that are visibly soiled.
* Cover your mouth and nose with a tissue when you cough or sneeze or use the inside of your elbow.
* Avoid touching your eyes, nose, or mouth with unwashed hands.
* Avoid close contact with people who are sick.
* Employees who have symptoms (i.e., fever, cough, or shortness of breath) should notify their supervisor and stay home—DO NOT GO TO WORK.
* Sick employees should follow [CDC Recommended Steps](https://www.cdc.gov/coronavirus/2019-ncov/your-health/quarantine-isolation.html). Employees should not return to work until the criteria to [discontinue home isolation](https://www.cdc.gov/coronavirus/2019-ncov/hcp/disposition-in-home-patients.html) are met, in consultation with healthcare providers and state and local health departments.

General Job Site / Office Practices

* Clean AND disinfect frequently touched objects and surfaces such as workstations, keyboards, telephones, handrails, and doorknobs. Dirty surfaces can be cleaned with soap and water prior to disinfection. To disinfect, use [products that meet EPA’s criteria for use against SARS-CoV-2external icon](https://www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2), the cause of COVID-19, and are appropriate for the surface.
* Avoid using other employees’ phones, desks, offices, or other work tools and equipment, when possible. If necessary, clean and disinfect them before and after use.
* Clean and disinfect frequently used tools and equipment on a regular basis.
  + This includes other elements of the jobsite where possible.
  + Employees should regularly do the same in their assigned work areas.
* Clean shared spaces such as trailers and break/lunchrooms at least once per day.
* Disinfect shared surfaces (door handles, machinery controls, etc.) on a regular basis.
* Avoid sharing tools with co-workers if it can be avoided. If not, disinfect before and after each use.
* Arrange for any portable job site toilets to be cleaned by the leasing company at least twice per week and disinfected on the inside.
* Any trash collected from the jobsite must be changed frequently by someone wearing gloves.
* In addition to regular PPE for workers engaged in various tasks (fall protection, hard hats, hearing protection), employers will also provide:
  + Gloves: Gloves should be worn at all times while on-site. The type of glove worn should be appropriate to the task. Gloves should not be shared if at all possible.
  + Eye protection: Eye protection should be worn at all times while on-site.

1. This template COVID-19 Exposure Prevention, Preparedness, and Response Plan for Scrap Recyclers has been developed through research acquired from various sources. This document is a “template” that individual companies should review carefully and tailor to their own work and jobsites. **It does not constitute legal advice and should not be construed on its own as fulfilling a company’s overall obligations to ensure a safe and healthful work environment.** As the COVID-19 outbreak develops, the information and recommendations contained in this document may change and thus, recyclers should continue to monitor developments in this area. [↑](#footnote-ref-1)
2. Recovery is defined as: (1) resolution of fever with the use of fever-reducing medications; and (2) improvement in respiratory symptoms (e.g., cough, shortness of breath). [↑](#footnote-ref-2)