

EPA COVID-19 Health & Safety Guidelines for Field Activities

Background

- The COVID-19 Health and Safety (H&S) Guidelines for Field Activities represent an integrated set of safety and health guidance that provide timely and consistent information for employees conducting field activities.
- The Guidelines merge several Agency program-specific COVID-19 H&S guidance documents into an overall document to address COVID-19 safety concerns applicable to field activities.
- The guidelines are specific to COVID-19 only and are not intended to supersede existing health and safety requirements or hazard assessments, such as Health and Safety Plans (HASP), the Emergency Responder Health and Safety Manual, Personal Protective Equipment (PPE) hazard assessment guidelines, Job Hazard Analysis (JHA), Job Safety Analysis (JSA), and mobile/vessel laboratory Chemical Hygiene Plans (CHP).



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Introduction

- Provides safety best practices for field work
- Incorporates guidance from CDC, NIOSH, ATSDR, OSHA, and FEMA
- Does not supersede existing health & safety requirements or hazard assessments
- Can be shared with contractors, federal, state, local, territorial and tribal organizations

Document Organization

- Respiratory Protection
- Safety Training and Medical Clearance
- Pre-Travel Considerations
- Travel-Related Recommendations
- Additional General Recommendations
- Workplace Illness and Injuries
- Resources, including JHA
- Inspections
- Site Work

Respiratory Protection



Cloth Face
Covering



Disposable
Surgical
Mask



N95
Respirator



Air
Purifying
Respirator



Powered
Air
Purifying
Respirator

Disposable Surgical Masks and Cloth Face Coverings

- Sufficient for most field activities
- Required when:
 - State or local jurisdiction requires use
 - Respirator use is not required and social distancing cannot be maintained
- Should not be worn if they create a new hazard (heat and physical stress)
 - Replace with different PPE
 - Use administrative and/or engineering controls
- Replace:
 - End of work shift
 - If wet, soiled, or visibly contaminated

Disposable Surgical Masks and Cloth Face Coverings

	Required or Voluntary Use
Hazard Assessment	No
Respiratory Protection Program	No
Medical Clearance	No
Fit Testing	No
Training	No

N95s and other Filtering Facepiece Respirators (FFR)

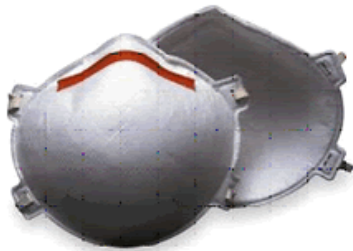
	Required Use	Voluntary Use
Respiratory Protection Program	Yes	No
Medical Clearance	Yes	No (FFRs)
Training	Yes	Appendix D & EPA's Training
Fit Testing	Yes	No
Hazard Assessment	Yes – Must identify that respirator use is required	No* - under the OSHA RP Standard (*EPA still requires field work to have a hazard assessment / JHA completed as per the OSHA PPE Standard.)
Other Requirements	None	Agency must ensure that the respirator is cleaned, stored, and maintained

APRs and PAPRs (Elastomeric)

	Required Use	Voluntary Use
Respiratory Protection Program	Yes	Yes
Medical Clearance	Yes	Yes (Elastomeric facepiece)
Training	Yes	Appendix D & EPA's Training
Fit Testing	Yes	No
Hazard Assessment	Yes – Must identify that respirator use is required	No* - under the OSHA RP Standard (*EPA still requires field work to have a hazard assessment / JHA completed as per the OSHA PPE Standard.)
Other Requirements	None	Agency must ensure that the respirator is cleaned, stored, and maintained

EPA's Voluntary-Use Respirator Training

- [SSD SharePoint training](#) on voluntary use of:
 - Filtering Facepiece Respirators (FFRs)
 - Air Purifying Respirators (APRs)



Safety and Medical Clearance

- Field Health & Safety Training*
- 24- or 40-hour HAZWOPER training for Superfund sites*
- Medical Clearance*
- Respiratory Protection Program
- Vaccines

*Temporarily extended by six months from the date of expiration

Safety Training

- Online safety training program is available (FedTalent):
 - 24 - hour Field safety training
 - 8 - hour safety refresher training (field or HAZWOPER).
- Virtual HAZWOPER safety training classes are available from HAZTRAIN through the ERT Training Program (ERTP).
- 40 - hour HAZWOPER training (part virtual/hands on) is currently under development.

Medical Clearance

- In March, SSD and FOH extended medical clearances for 6 months.
- SSD has been working with FOH to extend medical clearances for some employees who are now close to 18 months since last exam.
- SSD has piloted virtual exams between the FOH Physician and employees for further extension of medical and respiratory clearances beyond the current 6-month extension.
- Most FOH health units are now opening up and some are scheduling or conducting physical exams – check with local SEMP Manager
- Current discussions ongoing with FOH to offer the virtual exams for clearance extensions even when the health units become available.

Respiratory Clearance and Fit Testing

- Spirometry testing has been suspended by FOH during exam.
- Respiratory clearance based on overall outcome of physical exam.
- Respirator Fit testing currently suspended by SEMP Managers.
- Fit test protocol has recently been shortened by OSHA & EPA.
- ERT developed protocol for reduced contact fit testing during COVID-19.

Reduced Contact Respirator Fit Testing

- Only those in urgent need of a respirator fit test will be considered. All routine fit tests have currently been suspended.
- The fit test will only be conducted using the fit test subject's assigned respirator. If they don't have an assigned respirator, they need to obtain one.
- There will be No Sharing of respirator masks or fit test sample tubing.
- The fit test operator will wear a face covering and make every effort to reduce the contact time with the fit test subject, socially distancing when possible.
- Prior to beginning the fit test, the operator will disinfect the PortaCount and connect new sample tubing to the fit test subject's respirator.
- The fit test subject will don the respirator and follow the prompts for each step while the fit test operator socially distances during the test (can leave room).

OSHA Risk Categories

- **Very High Exposure Risk**
 - High potential for exposure to known or suspected sources of COVID-19 (healthcare, lab, or morgue workers)
 - PPE: Protective suit, gloves, face shield or goggles, face mask or respirator
- **High Exposure Risk**
 - High potential for exposure to known or suspected sources of COVID-19 (healthcare delivery and support staff, medical transport workers, mortuary workers)
 - PPE: Protective suit, gloves, face shield or goggles, face mask or respirator



PPE will vary by work task, including the results of hazard assessments

OSHA Risk Categories

- Medium Exposure Risk
 - Frequent or close contact with people who may be infected (workers in contact with the general public)
 - PPE: Protective suit, gloves, face covering, or face shield and goggles
- Lower Exposure Risk
 - Low potential for exposure; not in contact with general public
 - PPE: As required by other job tasks



PPE will vary by work task, including the results of hazard assessments

EPA Risk Categories (based on OSHA)

HIGH EXPOSURE RISK

- COVID-19 disinfection
- Law enforcement

MEDIUM EXPOSURE RISK

- Emergency response
- COVID-19 laboratory
- Laboratory inspections
- Facility inspections
- Site work with public interaction
- Community involvement
- Overnight travel

LOW EXPOSURE RISK

- Outside sampling/monitoring*
- General laboratory work
- Site work with low/no public interaction
- Virtual public meetings
- Local travel

*No public interaction

Workplace Illness and Injuries

- Call 911 immediately if there is a life-threatening emergency
- Follow HASP procedures if an employee or contractor becomes ill
- Report illnesses to supervisor and SHEMP manager
- Seek medical treatment for illness or injury
 - Do not provide private health insurance
 - Request a DOL Form CA-16
- Self-isolate if experiencing COVID-19 symptoms

Pre-Travel Considerations

For workers with confirmed or potential exposure to COVID-19

GENERAL WORKERS

- Follow *CDC Interim Guidance for Businesses and Employers Responding to Coronavirus Disease 2019 (COVID-19)*
- Symptom-based criteria: At least 24 hours since last fever AND improvement in symptoms
- Test-based criteria: No longer recommended
- For workers with severe illness, isolate up to 20 days
- For asymptomatic workers, isolation can be discontinued 10 days after first positive test

CRITICAL INFRASTRUCTURE WORKERS

- *Implementing Safety Practices for Critical Infrastructure Workers Who May Have Had Exposure to a Person with Suspected or Confirmed COVID-19*
- Can work if asymptomatic
 - Pre-screen
 - Monitor symptoms
 - Social distance
 - Disinfect and clean workspaces

EPA Self-Assessment

- Do you feel well or have any of the following symptoms?
 - Temperature 100.4°F or higher
 - Fever or chills
 - Cough or shortness of breath
 - Muscle pain
 - Headache
 - Sore throat
 - New loss of taste or smell
 - Congestion or runny nose
 - Nausea or vomiting
 - Diarrhea
- Have you been in close contact of someone who has COVID-19 or has symptoms?
- Have you received instructions from a public health authority to quarantine?

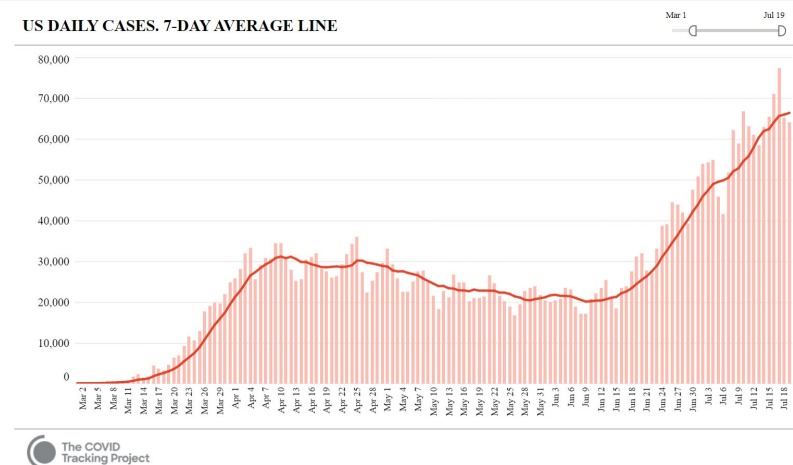
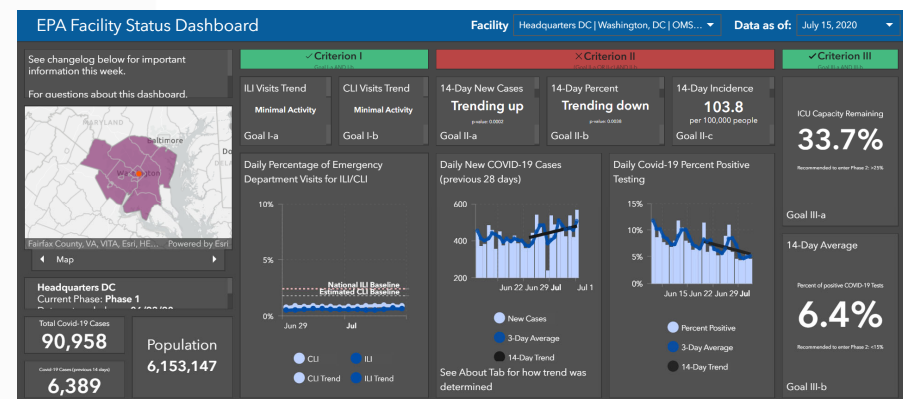


Pre-Travel Considerations

- Check local and state requirements
- Conduct hazard assessment for COVID-19
- Consult with SHEMP manager
- Obtain adequate supplies of cloth face coverings, PPE, and disinfectants
- Assess prevalence of COVID-19 in areas traveling to or through, or performing field work

Assessing Prevalence

- EPA Facility Status Dashboard
- CDC State, Territorial, Local and Tribal Health Department Search Tool
- CDC COVID-19 Tracker
- Johns Hopkins University Coronavirus Resource Center
- COVID Tracking Project
- U.S. Census Bureau Coronavirus (COVID-19) Pandemic Site



Travel Recommendations

- Drive, don't fly
 - One person per vehicle
 - Separate passengers and wear face coverings if multiple passengers
 - Disinfect vehicle prior to and during use
 - Check TSA requirements and guidance if driving isn't an option
- Hotel
 - Procure lodgings with refrigerator, microwave, and/or kitchen
 - Disinfect your room
 - Use the "No Housekeeping" sign
 - Avoid the hotel breakfast buffet

Travel Recommendations

- Dining
 - Prepare meals at the hotel
 - Use meal delivery service, takeout, or curbside service
 - Consider alternatives to indoor seating at restaurants
- Clothing
 - Change out of field gear and wash it in hot water upon returning home
 - Keep gear that can't be laundered outside (in a plastic bag in a vehicle or garage)

Additional Recommendations

- Avoid large crowds
- Practice social distancing
- Contact supervisor or SHEMP manager if there's an unsafe situation
- Wash hands frequently
- Limit restroom use in convenience stores, gas stations and public facilities (e.g., rest stops). Use the disinfectant wipes and hand sanitizer that are provide in the GOV if use of public restrooms is required.
- Don't share coolers
- Don't shake hands

Additional Recommendations

- Don't share items (pens, cameras, clipboards, equipment)
- Keep meetings to a minimum or use virtual tools
- Doff PPE and disinfect prior to moving between work locations
- Disinfect equipment that is handled by multiple people
- Clean or disinfect work areas daily
- Disinfect vehicles daily

Supplemental Information

■ Resources

- COVID-19 JHA
- Vehicle Utilization, Cleaning, and Disinfecting Recommendations
- Voluntary FFR User Training
- Reduced Contact Fit Test Protocol (draft)
- Example Health and Safety Plan (under development)

■ Appendices

- Civil Inspections, On-site Compliance Monitoring, Compliance and Technical Assistance
- Superfund Site, Resource Conservation and Recovery Act (RCRA) Corrective Actions, Oil, and Emergency Response Work

Appendix A - Inspections

- Applies to all EPA inspectors and inspections & non-compliance field staff
- Decision on inspections should be consistent with applicable Agency priorities and OECA guidance
- Conduct hazard assessment using COVID JHA, and comply with all other normal safety requirements
- Notify facility at least 24 hours before
- Comply with facility requirements (health screening, face coverings, gloves, hand sanitization) unless requirements for EPA personnel are more rigorous than those for facility employees and visitors
- Complete a Site Safety Plan

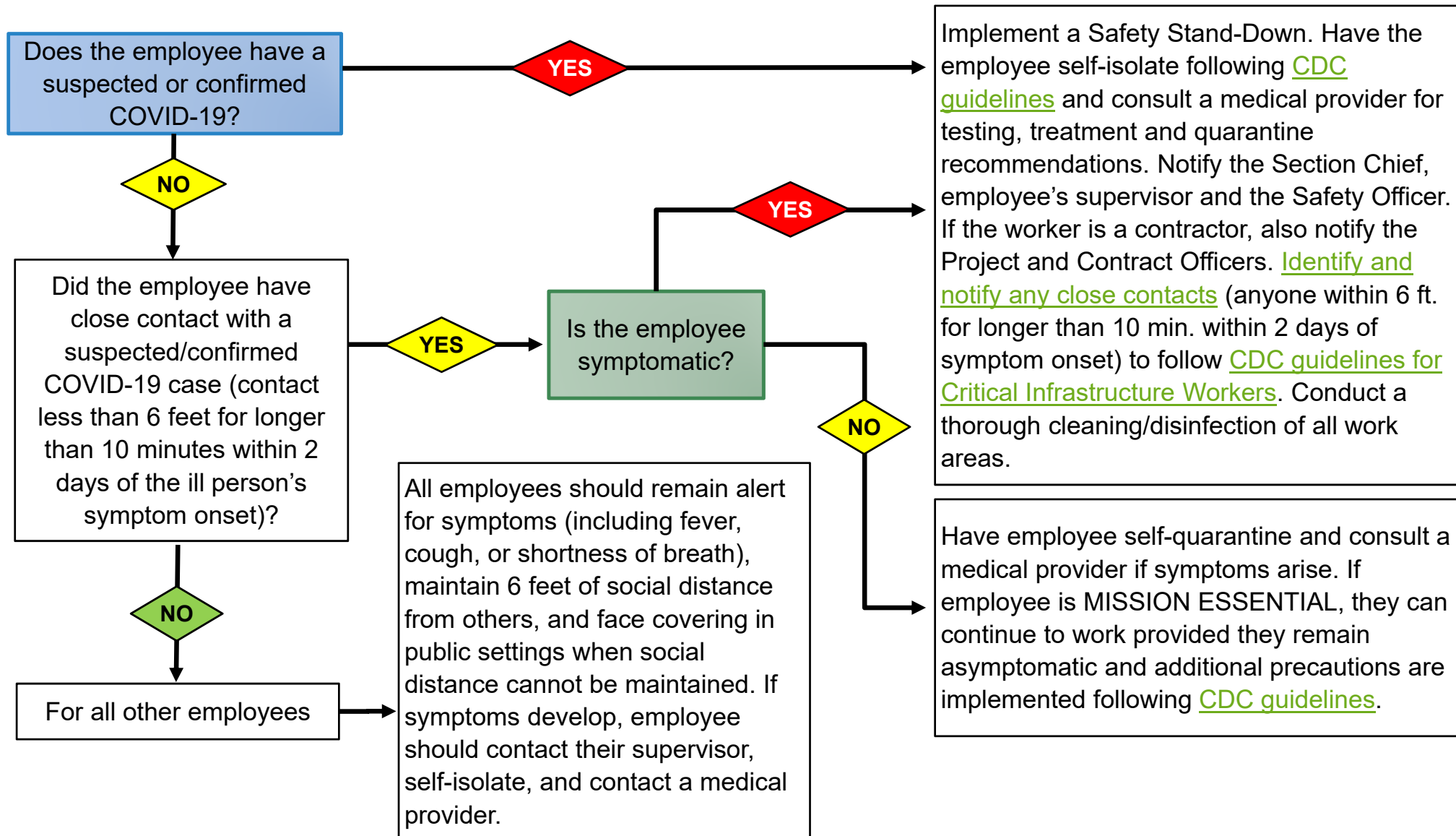
Appendix A - Inspections

- Conduct opening and closing conferences remotely (if possible)
- Review facility documents before the inspection
 - Avoid reviewing documents in a small confined space where social distancing isn't possible
 - Wash hands or use hand sanitizer after touching documents or materials
- Limit the number of personnel present during the inspection
- Conduct meetings outdoors in or large indoor spaces

Appendix B – Site Work

- Pre-screen workers for symptoms and conduct regular symptom monitoring
- Large-scale responses or sites, consider using an EMT if available and adding a safety team that focuses on COVID-19 screening and risk reduction
- Suspended after-hours group recreational activities
- Do not hold in-person public meetings
- Mobilize portable toilets and handwashing stations even if site activities are a short duration

[illegible]



Appendix B – Site Work



35th Avenue PAH/Arsenic Site, Birmingham, AL

- Use multiple office trailers
- Disinfect site trailers, toilet facilities and handwashing stations daily
- Don't share respiratory protection equipment; assigned SCBAs, SARS, PAPRs to the employee for the duration of the activity. Thoroughly disinfect, following manufacturer recommendations, prior to issuing to a different employee.

Residential Site Work

- Keep the number of personnel entering the home to a minimum
- Limit face-to-face interactions
 - Use the phone instead of knocking or ringing the doorbell
 - When knocking, knock, then step back from the doorway
- Use electronic access agreements
- Cancel final walk-throughs unless the property owner insists on one
- If relocating residents, encourage relocation with family or friends




35th Avenue PAH/Arsenic Site, Birmingham, AL

JHA

- Vehicle travel
- Air travel
- Accommodations
- Site work

6. EPA COVID-19 OLEM Job Hazard Analysis Supplement - ILLUSTRATIVE EXAMPLE

	Job Hazard Analysis (JHA) COVID-19 Supplement (OLEM EXAMPLE)	Supervisor Name:	
		Supervisor Signature:	
		SHEMP Manager Name:	
		SHEMP Manager Signature:	
		Date:	
Job/Activity Name: COVID-19 Supplement – Attach the job specific JHA used for the job task to this supplemental JHA to document the OSHA risk level provided below for the job.		JHA #: COVID Supplement to existing JHA (please attach)	
Division/Branch: SEMD/ERRB	Area /Location (s): Removal Site, COVID-19 Medium Risk	Other Information (JHA participating employees):	
REQUIRED PERSONAL PROTECTIVE EQUIPMENT FOR ENTIRE JOB <input checked="" type="checkbox"/> Appropriate Basic PPE, (Safety glasses, safety shoes, hart hat, gloves)			
<input type="checkbox"/> Safety glasses	<input type="checkbox"/> Respirator, Type _____	<input type="checkbox"/> Welding gloves/ leathers	<input checked="" type="checkbox"/> Safety shoes
<input checked="" type="checkbox"/> Goggles	<input checked="" type="checkbox"/> Hard hat	<input checked="" type="checkbox"/> Protective suit	<input type="checkbox"/> Other rubber boots _____
<input type="checkbox"/> Face shield	<input type="checkbox"/> Hearing protection	<input type="checkbox"/> Lab Coat &/or Apron	<input type="checkbox"/> Portable GFCI
<input checked="" type="checkbox"/> Disposable surgical mask	<input checked="" type="checkbox"/> Appropriate gloves	<input type="checkbox"/> Fall protection	<input checked="" type="checkbox"/> High visibility vest
<input type="checkbox"/> Other _____	<input type="checkbox"/> Other _____	<input type="checkbox"/> Other _____	<input type="checkbox"/> Other _____

Follow the steps outlined in the [EPA Self-Assessment to Stop the Spread of COVID-19](#) tool to make sure employees are not ill or symptomatic. Perform this self-assessment prior to departing and daily before reporting to work.

Always consider Engineering or Administrative Controls before use of PPE. These controls were considered: ☒ YES, ☐ NO, if not feasible explain why:

EPA COVID-19 JHA Supplement Instructions

- Complete all information as requested on the form
- Review the existing JHA for the task, the OSHA COVID-19 risk levels above, and the listed PPE.
- For tasks considered Medium, High and Very High risk, list out the basic task steps, the actual COVID-19 hazard, and the projected hazard control (PPE, engineering control, administrative control).
- Not all hazards and controls are listed at the bottom of the first page
- Determination of required engineering controls, administrative controls, and PPE is needed

EPA COVID-19 JHA Supplement Instructions

- It is not necessary to list minor insignificant steps or non-COVID-19 related hazards
- Complete the column for Corrective Action or Hazard Controls for each Task or Step listed.
- Consider other additional risk such as working indoors, tight spaces, performing strenuous activity or working in high heat and/or humidity environments.

EPA COVID-19 JHA Supplement Instructions

- **Points to remember**

- This is to be used as a supplement to existing JHAs to document important controls for COVID-19 related hazards that may be present during specific work tasks.
- A supervisor and employee that performs the job should complete this form together; to ensure they agree as to the actual steps involved in this job, in conjunction with the local SHEMP Manager.



Questions

- Contact your local SEMP manager