

MANUAL #2

THE HAZARDOUS MATERIALS, SUBSTANCES AND WASTES PANDEMIC PREPAREDNESS AND PREVENTION PLAN: TRAINING AND INFORMATION LINKS

OSHA's Guidance on Preparing Workplaces for COVID-19

<https://www.osha.gov/Publications/OSHA3990.pdf>

The National Response Team's Integrated Contingency Plan Guidance ("one plan"). <https://www.nrt.org/sites/2/files/NRT%20ICPG.pdf>

Personal protective equipment (PPE) is a main source of protection for all workers. Depending on the type of situation an employee could be involved in emergency which may include flooding, hurricanes, fire, electricity, structural collapse, falls, terrorism, earthquakes, tornadoes, extreme temperatures, diseases, among others including influenza type outbreaks. It is necessary to protect all workers from physical, chemical and biological hazards. Routes of exposure include inhalation, dermal contact, ingestion or contact through mucous membranes. Therefore, main protective equipment includes respirators, eye protection, hearing protection and protective clothing. Depending on the hazard, the recommendations on the use of PPE change.

- Some examples of PPE include: gloves, goggles, face shields, face masks, and respiratory protection, when appropriate.

Personal Protective Equipment

(<https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910SubpartI>)

Eye Protection such as face shields or goggles. Eyes are always at risk of exposure to different hazards that may include contact with dust, metal particles, debris, glass particles, gas, chemicals, blood borne pathogens and thermal hazards. Exposure to these hazards may lead to the development of adverse illness that affect eyesight which can include eyeball lacerations,

affectations to the cornea such as corneal abrasions, conjunctivitis, and burns. Eye protection is vital to provide an appropriate response and assure health and safety of workers. Eye protection should be properly cleaned and disposed of when use is completed.

Link to OSHA 1910.133 Eye and Face Protection

<https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.133>

Surgical Masks/face masks/face shields are used by workers to protect themselves against splashes and sprays containing infectious agents. These are also placed on sick individuals to prevent respiratory infections that spread by large droplets; worn by surgeons to avoid contaminating surgical sites. May not protect against airborne transmissible infectious agents due to loose fit and lack of seal. They can be used by almost anyone, regardless of training. Should be properly disposed of after use.

Link to OSHA 1910.133 Eye and Face Protection

<https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.133>

Respirators are one of the most important pieces of personal protective equipment for workers when other control systems are not feasible to protect the health and safety of workers.

Respirators cover as minimum the nose and mouth of users and remove contaminants from the air by filtering airborne particles, infectious agents or chemical agents from air.

The selection of an appropriate respirator depends on the type of particle, infectious agent or chemical it is protecting from, users should perform fit testing prior to use and have appropriate medical evaluations and monitoring, cleaning and oversight by a knowledgeable staff member.

Link to CDC Respirator Medical Evaluation and OSHA Video:

https://www.cdc.gov/niosh/npptl/topics/respirators/disp_part/respsource3medical.html

Link to CDC/NIOSH Respirator descriptions/uses:

<https://www.cdc.gov/niosh/topics/respirators/default.html>

Link to OSHA 1910.134 Respiratory Protection:

<https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.134>

Link to Federal Register 9/26/2019 OSHA Additional Ambient Aerosol CNC Quantitative Fit Testing Protocols: Respiratory Protection Standard:

<https://www.federalregister.gov/documents/2019/09/26/2019-20686/additional-ambient-aero-sol-cnc-quantitative-fit-testing-protocols-respiratory-protection-standard>

Link to OSHA 1910.120 Hazardous waste operations and emergency response:

<https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.120>

All types of PPE must be:

- Selected based upon the hazard to the worker.
- Properly fitted and periodically refitted, as applicable (e.g., respirators)
- Consistently and properly worn when required.
- Regularly inspected, maintained, and replaced, as necessary.
- Properly removed, cleaned, and stored or disposed of, as applicable, to avoid contamination of self, others, or the environment.

****Employers are obligated to provide their workers with PPE needed to keep them safe while performing their jobs.**

****Check with the CDC for Risk Exposure Levels and suggested PPE usage as they may differ with each pandemic event.**

More Information:

Below are several recommended websites to access the most current and accurate information:

- Occupational Safety and Health Administration website: www.osha.gov
- Centers for Disease Control and Prevention website: www.cdc.gov
- National Institute for Occupational Safety and Health website: www.cdc.gov/niosh

OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION

Visit www.osha.gov/complianceassistance/cas or call 1-800- 321-OSHA (6742) to contact your local OSHA office.

For more information or to find the local On-Site Consultation office in your state, visit www.osha.gov/consultation, or call 1-800-321-OSHA (6742).

All OSHA publications are free at www.osha.gov/publications and www.osha.gov/ebooks. You can also call 1-800-321-OSHA (6742) to order publications.

Signup for QuickTakes, OSHA's free, twice-monthly online newsletter with the latest newscast about OSHA initiatives and products to assist in finding and preventing workplace hazards. To sign up, visit www.osha.gov/quicktakes

In recent years, our country has seen numerous “pandemic” type events (e.g., Cholera, Smallpox, Polio, H1N1(Swine Flu), SARS, seasonal influenza and most recently the 2019 COVID-19). These pandemics caused society to experience numerous lifestyle changes. Many of our modern day experiences were also felt back in medieval times, when people practiced social distancing and quarantine to avoid contracting “Black Death”.

With the population of our country and the ever changing environmental and chemical technology factors imposed on our daily lives, we know that pandemics will never be a “thing of the past” but, an ongoing battle for scientists, governments and citizens as they will continue to affect us in different ways/strains. As history shows, our military has fought many battles, which caused injuries, many lost lives, psychological issues/stress, loss of monies/jobs, business closures, decrease in government funds etc. much like our pandemics. Our armed forces have taken those losses and continue to learn from them by creating new technology in hopes of being better equipped for the next battle.

This is what we, as citizens and business people, need to keep in mind. Like our military learns from each battle, businesses need to learn and hopefully better ourselves each time we struggle through a pandemic event, as each event can and often does cause havoc to everyday businesses. Many things happen to businesses, both large and small, loss of employees thru illness or needed layoffs, decrease of business sales, safety/security of business and unfortunately, because of diminishing income, some business closures.

Businesses, within their means, must do their best to be proactive and strive to make changes to avoid these great losses from happening. That is why it is so important for businesses to **BE PREPARED** for such a pandemic event, should one arise. This Pandemic Guide is meant for you to utilize as a reference tool. You should adjust it to your company's specific needs as you have done in the past with your Emergency Plans, although each company's Pandemic Event Preparedness Plan may be different in format, they will all supply personnel with the tools they need in the event of an Emergency.

There are twenty-eight [OSHA-approved State Plans](#), operating state-wide occupational safety and health programs. State Plans are required to have standards and enforcement programs that are at least as effective as OSHA's and may have different or more stringent requirements.

Example as seen below California goes one step further:

The California Division of Occupational Safety and Health (Cal/OSHA) [Aerosol Transmissible Diseases \(ATD\)](#) standard is aimed at preventing worker illness from infectious diseases that can be transmitted by inhaling air that contains viruses (including SARS-CoV-2), bacteria or other disease-causing organisms. While the Cal/OSHA ATD standard is only mandatory for certain healthcare employers in California, it may provide useful guidance for protecting other workers exposed to SARS-CoV-2.

****So, Please remember that this packet is informational and all regulatory laws made by OSHA/CDC and other local/state and/or federal government health agencies that change/update throughout the event MUST be followed.**

Now, let's get started.

First off we need to understand that a **pandemic** is defined as a global disease outbreak and can be caused by a variety of agents, including influenza and coronaviruses. During a pandemic, transmission can be anticipated in the workplace not only from patients to workers in healthcare settings, but also among co-workers and between members of the general public and workers in other types of workplaces.

So, personalize your Pandemic Event Preparedness Plan to your company and know that it needs to be reviewed on a regular basis and updated to any changes within the company, and also any specific guidance from federal, state, local, tribal, and/or territorial health agencies. In the event you need to activate your Pandemic Event Preparedness Plan, you will then be able to have a document that you can refer to for guidance, only needing to update it to address the specific exposure risks, sources of exposure, routes of transmission, and other unique characteristics to that current pandemic. After which time an event has occurred, you should revisit your Pandemic Event Preparedness Plan and update/change it in accordance to things that transpired, this will make your plan even better the next time it is utilized.

Remember- a lack of continuity planning can result in a cascade of failures as employers attempt to address challenges with insufficient resources and workers who might not be adequately trained for jobs they may have to perform under pandemic conditions.

Prepare to Implement Basic Infection Prevention Measures

For most employers, protecting workers will depend on emphasizing basic infection prevention measures. As appropriate, all employers should implement good hygiene and infection control practices, including:

- Promote frequent and thorough hand washing, including by providing workers, customers, and worksite visitors with a place to wash their hands. If soap and running water are not immediately available, provide alcohol-based hand rubs containing at least

60% alcohol. **Follow current advice from CDC/OSHA for best source for soap and water replacement.**

- Encourage workers to stay home if they are sick.
- Encourage respiratory etiquette, including covering coughs and sneezes.
- Provide customers and the public with tissues and trash receptacles.
- Employers should explore whether they can establish policies and practices, such as flexible worksites (e.g., telecommuting) and flexible work hours (e.g., staggered shifts), to increase the physical distance among employees and between employees and others if state and local health authorities recommend the use of social distancing strategies.
- Discourage workers from using other workers' phones, desks, offices, or other work tools and equipment, when possible.
- Maintain regular housekeeping practices, including routine cleaning and disinfecting of surfaces, equipment, and other elements of the work environment. **When choosing cleaning chemicals, employers should consult information on Environmental Protection Agency (EPA)-approved disinfectant labels with claims against current event emerging pathogens.** Follow the manufacturer's instructions for use of all cleaning and disinfection products (e.g., concentration, application method and contact time, PPE). **Follow current advice from CDC/OSHA for best source for soap and water replacement.**
- Link to Sanitation [1910.141](#).

Develop Policies and Procedures for Prompt Identification and Isolation of Sick People, if Appropriate

Prompt identification and isolation of potentially infectious individuals is a critical step in protecting workers, customers, visitors, and others at a worksite.

- Employers should inform and encourage employees to self-monitor for signs and symptoms, if they suspect possible exposure.
- Employers should develop policies and procedures for employees to report when they are sick or experiencing symptoms.

- Where appropriate, employers should develop policies and procedures for immediately isolating people who have signs and/or symptoms, and train workers to implement them. 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.
- Take steps to limit spread of the respiratory secretions of a person who may have been infected. Provide a face mask, if feasible and available, and ask the person to wear it, if tolerated. Note: A face mask (also called a surgical mask, procedure mask, or other similar terms) on a patient or other sick person should not be confused with PPE for a worker; the mask acts to contain potentially infectious respiratory secretions at the source (i.e., the person's nose and mouth).
- If possible, isolate people suspected of having condition separately from those with confirmed cases of the virus to prevent further transmission—particularly in worksites where medical screening, triage, or healthcare activities occur, using either permanent (e.g., wall/different room) or temporary barrier (e.g., plastic sheeting).
- Restrict the number of personnel entering isolation areas.
- Protect workers in close contact with a sick person or who have prolonged/repeated contact with such persons by using additional engineering and administrative controls, safe work practices, and PPE. Workers whose activities involve close or prolonged/repeated contact with sick people are addressed further in later sections covering workplaces classified at medium and very high or high exposure risk.

Develop, Implement, and Communicate about Workplace Flexibilities and Protections

- Actively encourage sick employees to stay home.
- Ensure that sick leave policies are flexible and consistent with public health guidance and that employees are aware of these policies.
- Talk with companies that provide your business with contract or temporary employees about the importance of sick employees staying home and encourage them to develop non-punitive leave policies.

- Do not require a healthcare provider's note for employees who are sick with acute respiratory illness to validate their illness or to return to work, as healthcare provider offices and medical facilities may be extremely busy and not able to provide such documentation in a timely way. (company discretion/government protocol)
- Maintain flexible policies that permit employees to stay home to care for a sick family member. Employers should be aware that more employees may need to stay at home to care for sick children or other sick family members than is usual.
- Recognize that workers with ill family members may need to stay home to care for them. **See CDC's Interim Guidance.**
- Be aware of workers' concerns about pay, leave, safety, health, and other issues that may arise during infectious disease outbreaks. Provide adequate, usable, and appropriate training, education, and informational material about business-essential job functions and worker health and safety, including proper hygiene practices and the use of any workplace controls (including PPE). Informed workers who feel safe at work are less likely to be unnecessarily absent.
- Work with insurance companies (e.g., those providing employee health benefits) and state and local health agencies to provide information to workers and customers about medical care in the event of an outbreak.

Implement Workplace Engineering and Administrative Controls

Occupational safety and health professionals use a framework called the “**hierarchy of controls**” to select ways of controlling workplace hazards. In other words, the best way to control a hazard is to systematically remove it from the workplace, rather than relying on workers to reduce their exposure. When it may not be possible to eliminate the hazard, the most effective protection measures are (listed from most effective to least effective): engineering controls, administrative controls, safe work practices (a type of administrative control), and PPE.

There are advantages and disadvantages to each type of control measure when considering the ease of implementation, effectiveness, and cost. In most cases, a combination of control measures will be necessary to protect workers from exposure. Please refer to CDC recommendations with each different scenario.

Engineering Controls- Engineering controls involve isolating employees from work related hazards. In workplaces where they are appropriate, these types of controls reduce exposure to

hazards without relying on worker behavior and can be the most cost-effective solution to implement.

Administrative Controls- Administrative controls require action by the worker or employer. Typically, administrative controls are changes in work policy or procedures to reduce or minimize exposure to a hazard.

Safe Work Practices- Safe work practices are types of administrative controls that include procedures for safe and proper work used to reduce the duration, frequency, or intensity of exposure to a hazard.

Pandemic preparedness is most effective if it is built on general principles.
Remember that:

- Pandemic preparedness, response and evaluation should be built on generic preparedness platforms, structures, mechanisms and plans for crisis and emergency management like To the extent possible, pandemic preparedness should aim to strengthen existing systems rather than developing new ones.