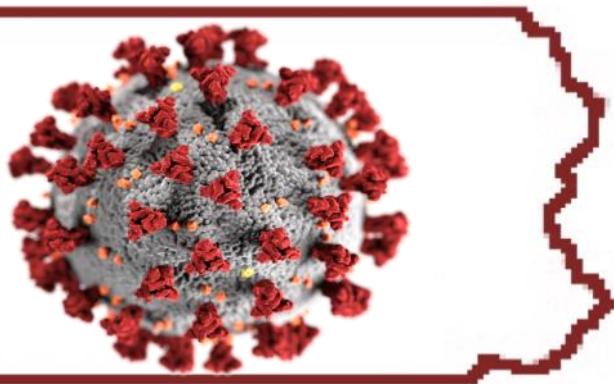




# Pennsylvania OSHA Consultation Program

## *The Pennsylvania Consultation Connection*

June 2020



### COVID-19 in Pennsylvania

***If you haven't recently visited our website at IUP please do so:***

**IUP Safe Return To Work/ COVID-19**

Like the PA Bureau of Workers Compensation PATHs training group, we too have worked hard the past several weeks to provide you with the most up-to-date COVID-19 related information at the state and federal level. You will also find numerous resources linked which will help your organization identify and control COVID-19 hazards as you transition to "green." SARS-CoV-2 turned "normal" upside down, and we have a long path ahead of us.

While Pennsylvania moving to "green" is great news on every front, for our own safety and to protect at-risk persons we might work, cohabitate, or interact with, all of us have a social responsibility to strictly adhere to the PA Department of Health guidelines. This means wearing face coverings, practicing social distancing, washing hands, sanitizing living and workspaces, and working virtually whenever and wherever possible.

This responsibility extends to visits with PA-OSHA Consultation. As we return to our work, which is wherever you work, please ensure you communicate all COVID-19 prevention expectations and requirements before your consultant arrives onsite. Face coverings, gloves, social distancing, etc., we are as best prepared as we can be and will follow all instructions you provide us while onsite.

In closing, I ask you to please submit the client surveys at the end of your written reports; your critical feedback is appreciated, and ensures we continually improve.

*John Mulroy, PhD, CSP*

Program Director

This past spring semester Mr. Sean Rhodes, a recent graduate of IUP's Applied Mathematics Program, helped evaluate our aggregate visit data. [Two interesting findings:](#)

1

Employers engaging us over multiple years have fewer serious hazards. That means your workers are at a lower risk of getting hurt, and your organization should see the benefits in increased productivity and possibly reduced workers compensation premiums.

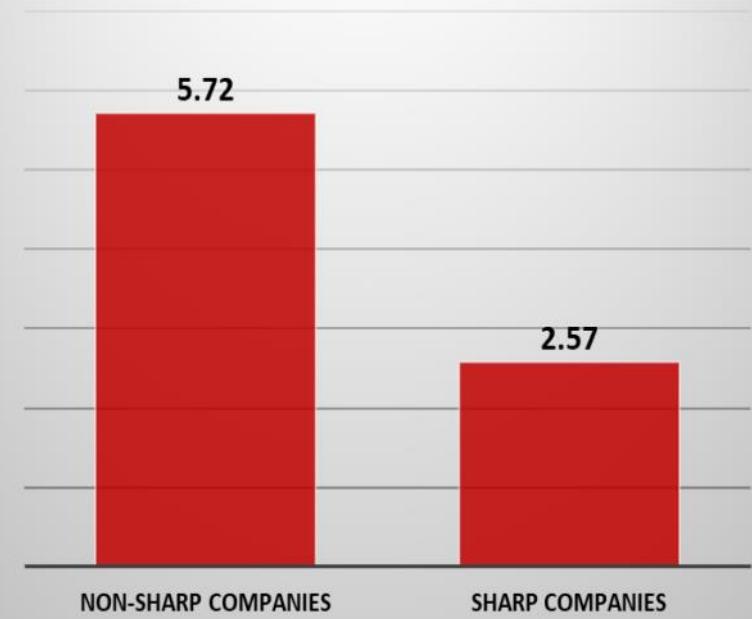
2

Have you considered SHARP and taking safety performance to the next level? Our visit data reveals consultants identify less than half the number of serious hazards during onsite visits with Pre-SHARP and SHARP employers compared to employers who are not in SHARP.

AVERAGE # SERIOUS HAZARDS IDENTIFIED OVER MULTIPLE VISITS



Average # Serious Hazards Identified per Visit  
(2014 - 2019)



A **SAFE** Pennsylvania workforce is a **COMPETITIVE** workforce

Investing your time in our **no-cost** compliance assistance services will pay off by improving OSHA compliance while reducing the risk of workplace injuries and illnesses.

**Interested in SHARP?**

Contact Us: **PA/OSHA Consultation Program**

Call Toll free: **1-800-382-1241**

Visit our website: **[www.iup.edu/pa-oshaconsultation](http://www.iup.edu/pa-oshaconsultation)**

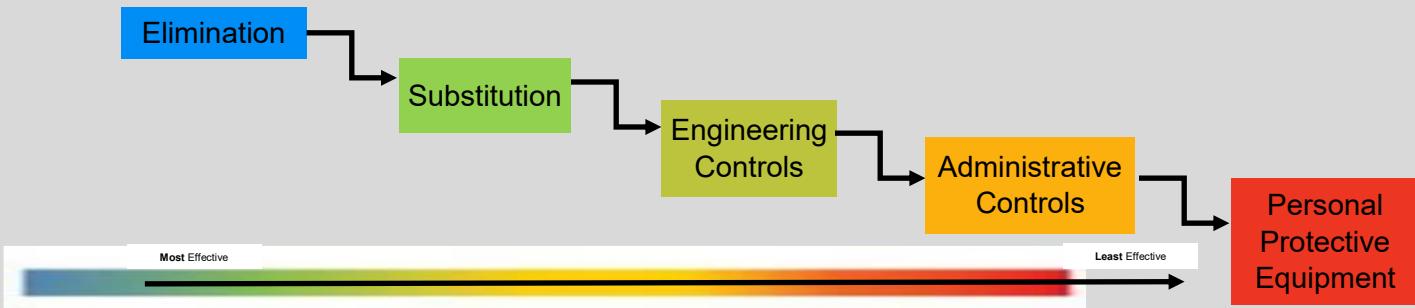


# Returning America Back to Work Within the Shadow of the COVID-19 Pandemic

As we move forward, we are slowly seeing what our new normal will look like in the places where we work. PA OSHA Consultation safety and health professionals can play a significant role in assisting employers with implementation of various controls to reduce the risk of COVID-19 within the workplace.

A biological hazard is evaluated using host susceptibility, agent pathogenicity, agent stability in the environment, and availability of therapeutic interventions. Coronavirus is the virus that causes COVID-19. More and more information is being obtained everyday about this virus but there is still limited immunity and no vaccine available. This is what makes the establishment of controls so critical as we reenter the workforce.

When looking at an approach to controlling this hazard one should go back to the basics of applying the hierarchy of controls as pictured below. These are (from most effective to least effective):



When evaluating an approach to applying controls keep in mind that the nature of the hazard is **biological** not chemical or physical. Guidelines for infection prevention and control should be reviewed as part of this evaluation. These guidelines describe how to minimize transmission and spread of the disease. These can be found at :

[http://www.hhs.gov/pandemicflu/plan/pdf/HHS\\_PandemicInfluenzaPlan.pdf](http://www.hhs.gov/pandemicflu/plan/pdf/HHS_PandemicInfluenzaPlan.pdf).

The guidelines include a plan that adopts controls based on:

- **droplet** transmission
- **contact** transmission
- **airborne** transmission

The Occupational Safety and Health Administration (OSHA) in their document [“Guidance on Preparing Workplaces for COVID-19”](#) has outlined

## FOUR RISK GROUP LEVELS (based on the industry)

- 1) VERY HIGH
- 2) HIGH
- 3) MEDIUM
- 4) LOW

The extent of controls for each of these risk groups will vary. These risk groups consider the:

- type of work performed,
- potential for interaction with people suspected or confirmed COVID-19 people, and
- contamination of the environment.

Except for our healthcare, medical transport, and mortuary industries most of the manufacturing and construction workplaces will fall into a medium to low risk category.



As we return to work, **a summary of recommendations using the hierarchy of controls** are listed on the following page.

OSHA, CDC, and AIHA all have developed industry specific return to work guidance documents. Refer to their websites or the [PA OSHA Consultation’s COVID-19 resources page](#).

# Summary of Recommendations Using the Hierarchy of Controls

Most Effective

## Elimination Physically remove the hazard

- ✓ Establish work from home policies and videoconferencing for group meetings.
- ✓ Emphasize to employees to stay at home if sick.

## Substitution Replace the hazard

- ✓ A treatment method or vaccine would need to be developed.
- ✓ Currently, no way to implement this control

## Engineering Isolate people from the hazard

- ✓ Optimize ventilation and filtration techniques for very high to high risk groups
- ✓ Establish an isolation room.
- ✓ Install physical guards between other employees or the public for medium to low risk groups

## Administrative Change the way people work

- ✓ Implement site access control and entry procedures.
- ✓ Establish social distancing rules of 6 feet away from other people.
- ✓ Mark floors on where to stand.
- ✓ Stagger shifts and breaks so social distancing can be maintained.
- ✓ Clean major touch points twice per day.
- ✓ Disinfect or sterilize equipment or areas used within the very high and high risk groups. \*
- ✓ Post signage on proper hand washing techniques.

## Personal Protective Equipment (PPE)

### Protect the worker

- ✓ Conduct a PPE hazard assessment for very high to high risk groups based on the task to be performed.
- ✓ Determine the type of respiratory protection necessary. Follow OSHA's respiratory protection standard (29 CFR 1910.134).
- ✓ Issue a face covering or surgical mask for medium to low risk groups

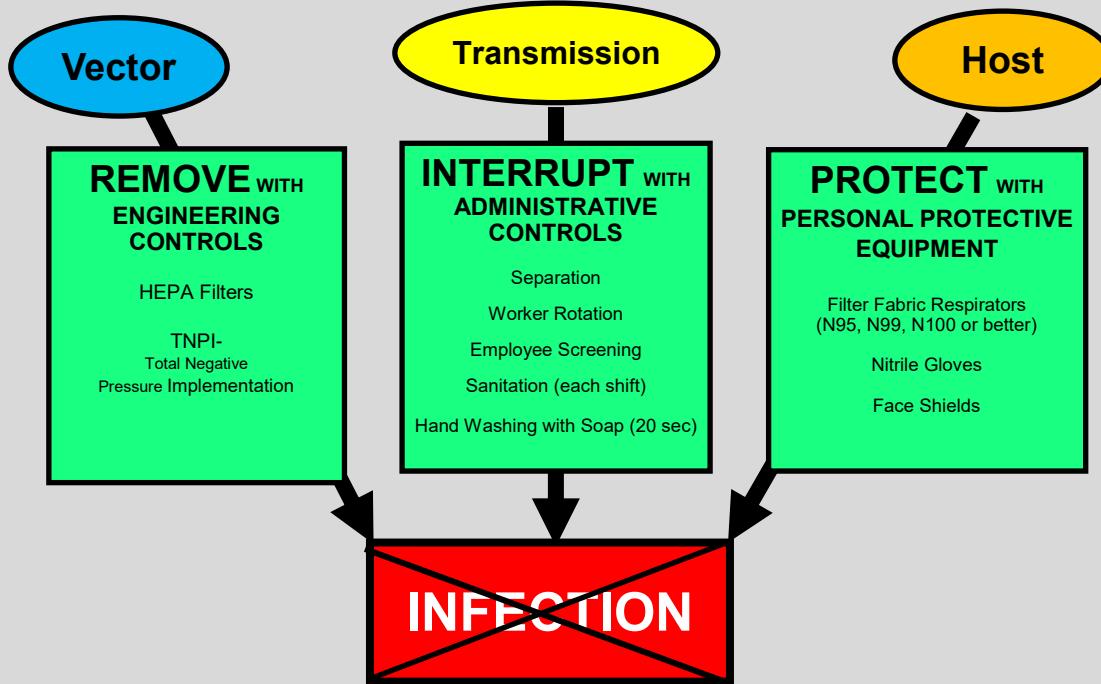
Least Effective

# What OSHA Requirements Apply to Employers During a Health Epidemic/Pandemic?

The Infection Model

= Vector + Transmission Route + Host

All three factors must all be present for an infection to move from one end of the model to the other. Thus, the goal of the employer is to “interrupt” the model. Remove the “Vector” from the workplace by use of Engineering controls—HEPA Filters, TNPI-Total Negative Pressure Implementation. Interrupt the “Transmission Route” using Administrative Controls—separation, worker rotation, employee screening (take temperature at start of shift), sanitization (using the EPA “N” list of products-each shift). Remove or Protect the “Host” through Administrative Controls-Personal Protective Equipment (filter-fabric respirators (N95, N99, N100 or better), nitrile gloves, face shields, hand sanitizer, hand washing with soap (20 secs min).



OSHA can use the General Duty Clause, Section 5(a)(1), of the Occupational Safety and Health Act to ensure that workers are protected from recognized safety and health hazards that may cause serious harm. A contagious virus/bacteria/fungus that can be spread in the workplace via surface transfer, air, or water (in cases of wet processes) would be considered a health hazard under these guidelines.

**Below are specific regulations that could apply to your circumstances/processes, depending on your business.**

Personal Protective Equipment (29 CFR 1910 subpart I), including:	General Environmental Controls (29 CFR 1910 subpart J),	Hazard Communication (29 CFR 1910.1200)
PPE General Requirements (1910.132)	Sanitation (1910.141)	Access to Employee Exposure & Medical Records (29 CFR 1910.1020)
Eye and Face Protection (1910.133)	Toxic and Hazardous Substances (29 CFR 1910 subpart z), including:	Occupational Exposure to Hazardous Chemicals in Laboratories (29 CFR 1910.1450)
Respiratory Protection (1910.134)	Bloodborne Pathogens (29 CFR 1910.1030)	Recording and reporting occupational injuries & illnesses (29 CFR part 1904)
Hand Protection (29 CFR 1910.138)		

The most effective way to prevent an OSHA citation is by implementing a **proactive** prevention model including an Employer Health & Safety Policy, Workplace Hazard Survey—including epidemiological sources, and enacting and enforcing procedures/best practices to address the hazards found or suspected.

Questions? Visit our website: [www.iup.edu/pa-oshaconsultation](http://www.iup.edu/pa-oshaconsultation)

# Respiratory Protection and the Dental Industry During COVID-19 Pandemic



Due to the nature of work involved with dental hygiene facilities, the potential for exposure to COVID-19 is much greater. The industry uses various instruments that result in the creation of visible spray and droplets containing water, saliva, blood, microorganisms, and other debris. The typical use of surgical masks in the industry does provide some level of protection but does not necessarily protect against airborne illnesses such as COVID-19. Due to this, the Occupational Safety and Health Administration has established recommendations for the use of personal protective equipment for dental practices based upon either the general pandemic guides or when providing emergency care to a patient with a suspected or confirmed case of COVID-19. The following is the table that has been developed as guidance:

Well Patients		Patients with Suspected or Confirmed COVID-19	
Dental procedures <b>not</b> involving aerosol-generating procedures	Dental procedures that <b>may</b> or are known to generate aerosols	Dental procedures <b>not</b> involving aerosol-generating procedures	Dental procedures that <b>may</b> or are known to generate aerosols
<ul style="list-style-type: none"><li>▲ Work clothing, such as scrubs, lab coat, and/or smock, or a gown</li><li>▲ Gloves</li><li>▲ Eye protection (e.g., goggles, face shield)</li><li>▲ Face mask (e.g., surgical mask)</li></ul>	<ul style="list-style-type: none"><li>▲ Gloves</li><li>▲ Gown</li><li>▲ Eye protection (e.g., goggles, face shield)</li><li>▲ NIOSH-certified, disposable N95 filtering facepiece respirator or better</li></ul>	<ul style="list-style-type: none"><li>▲ Gloves</li><li>▲ Gown</li><li>▲ Eye protection (e.g., goggles, face shield)</li><li>▲ NIOSH-certified, disposable N95 filtering facepiece respirator or better</li></ul>	<ul style="list-style-type: none"><li>▲ Gloves</li><li>▲ Gown</li><li>▲ Eye protection (e.g., goggles, face shield)</li><li>▲ NIOSH-certified, disposable N95 filtering facepiece respirator or better</li></ul>

In order to ensure the safety of the employee who may be required to don a NIOSH-certified N95 filtering facepiece respirator (or better), the employer must implement a full respiratory protection program as outlined in 29 CFR 1910.134. **(Note: The voluntary use of a filtering facepiece respirator does not require the following elements.)** This includes the development of a written program that will be implemented by a suitably trained program administrator. This program will need to be evaluated periodically to ensure effectiveness.

All employees who will be required to use the aforementioned respiratory protection during the pandemic must also be given a medical evaluation. This evaluation must be conducted by a physician or other licensed health care professional (PLHCP) to perform medical evaluations using a medical questionnaire or equivalent. A copy of the medical questionnaire may be obtained in [Appendix C](#) of 1910.134. Upon completion the employer must follow any restrictions set forth by the PLHCP.

Only after a medical evaluation is completed and the PLHCP approves the user for the designated respirator may the required annual fit test be conducted. This may be done either by qualitative or quantitative methods. Guidance for conducting the annual fit testing can be found in [Appendix A](#) of 1910.134.

Additionally, employees who will be required to don respiratory protection must be trained annually. This training must be comprehensive and understandable. The training must include the applicable information contained in 1910.134(k). If employees are not required to use, but are using respirators on a voluntary basis, then the information contained in [Appendix D](#) of the standard must be provided.

Reference:

Occupational Safety and Health Administration, COVID-19- Control and Prevention/Dental Workers and Employers, OSHA, viewed 5 May 2020, <https://www.osha.gov/SLTC/covid-19/dentistry.html>

Centers for Disease Control and Prevention, Guidance for Dental Settings, CDC, viewed 5 May 2020, <https://www.cdc.gov/coronavirus/2019-ncov/hcp/dental-settings.html>

Occupational Safety and Health Administration. (1998). Occupational safety and Health Standards: Personal Protective Equipment (Standard 1910.134) Retrieved from <https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.134>

# Tree Care Work: Falls, Electrocution, and Other Hazards

The **FOUR** leading causes of fatalities in the tree trimming and clearing industry

## Falls From Elevations

falls from

- trees,
- lifts,
- ladders;
- bucket trucks



## Struck By

struck by

- falling trees
- limbs
- motorized equipment



## Caught – In or Between

being caught

- in chippers
- between motorized equipment



## Electric Shock

electrical shock

- while working in the vicinity of overhead power lines.



There are many serious hazards in tree care work...

According to the Bureau of Labor Statistics, injury and illness rates in this industry are higher than in other industry sectors, and include sprains and strains from manual handling of tools and materials, electrical hazards from working in close proximity to power lines, falls from bucket trucks and trees, struck-by from working around motor vehicles and falling trees/limbs, and heat stress from extended periods of time outdoors.

# Tree Care Work: Falls, Electrocution, and Other Hazards

## Before beginning any tree care operation, employers need to:

**Assess the work site for fall and falling object hazards.**



- Is the ground sloped that could cause falls from equipment overturns and ladder slippage; Any nearby overhead objects or structures?
- Any weather-related hazards?

**Determine if workers will need to climb or use aerial lifts.**



- Ensure ladders are well maintained, visually inspected and not defective.
- Aerial lifts are used according the manufactures' instructions and not used as cranes to lift or hoist tree parts.

**Ensure workers who climb trees are trained on:**



- Climbing techniques,
- Using climbing spurs and gaffs, and
- Lifting and lowering hand tools and equipment.
- Inspecting all equipment for safe operation before starting work.
- Only use climbing equipment approved by the manufacturer for tree care work, including climbing lines, safety lines, personal fall protection equipment,

**Ensure that all workers at a tree care operation are trained in hazard recognition.**



- Prevent falls from elevation and
- Identify falling object hazards, the use of personal protective equipment, such as hard hats, to protect against injury from overhead falling objects.

**Identify electrical hazards.**



- If workers cannot remain at least 10 feet from electric lines to perform tree care operations, contact the utility company to de-energize and ground the lines.

**Ensure steps are taken to protect workers from falling object hazards:**



- Establish and mark drop zones with equipment, such as cones, where there is a hazard of objects falling.
- Ensure that all workers receive training on procedures for entering the drop zone and
- Ground workers must maintain a distance away from the tree-felling operations that is at least two times the height of the tree.

**Establish a visual or audible communication system.**



- Effectively communicate when employees who are beneath overhead tree workers should stand clear of the drop zone, and
- Communicate when it is safe to approach a drop zone.

**Have emergency procedures in place prior to the start of the tree care operation.**



- Determine if the worksite location has cellular telephone coverage
- Verify that every worker knows the address of the worksite.
- Establish a retreat path for ground workers so they can escape from falling trees.

For additional information, please visit the following links:

Electricity and Tree Care Work – A Deadly Combination <https://www.osha.gov/Publications/OSHA3861.pdf>

Tree Trimming – Fact Sheet [https://www.osha.gov/OshDoc/data\\_Hurricane\\_Facts/trim.pdf](https://www.osha.gov/OshDoc/data_Hurricane_Facts/trim.pdf)

Landscape and Horticultural Services <https://www.osha.gov/SLTC/landscaping/additionalinformation.html>

Line-Clearance Tree Trimming Operations eTool [https://www.osha.gov/SLTC/etools/electric\\_power/overheadlinework\\_lineclearance.html](https://www.osha.gov/SLTC/etools/electric_power/overheadlinework_lineclearance.html)

Working Safely with Chainsaws [https://www.osha.gov/OshDoc/data\\_Hurricane\\_Facts/chainsaws.pdf](https://www.osha.gov/OshDoc/data_Hurricane_Facts/chainsaws.pdf)

Chipper Machine Safety [https://www.osha.gov/OshDoc/data\\_Hurricane\\_Facts/chipper\\_machine.pdf](https://www.osha.gov/OshDoc/data_Hurricane_Facts/chipper_machine.pdf)

# Questions?

Call us Toll Free: **1-800-382-1241**

Or

Check out the [\*\*PA OSHA Consultation Website\*\*](#)

## *Training and Information*

The Pennsylvania OSHA Consultation Program has developed [\*\*\*Focal Point Series\*\*\*](#).

The Focal Point Series provides information on the top 25 areas identified by the Occupational Safety and Health Administration. The Series provides videos as well as presentation materials and employee handouts. The Focal Point Series can be found on our website and all materials are **free**. The materials for the topics can be found at :

<https://www.iup.edu/pa-oshaconsultation/focal-points/>

**Aerial Lifts**

**Bloodborne Pathogens**

**Confined Spaces- Construction**

**Confined Spaces- General Industry**

**Electrical Safety**

**Emergency Plans**

**Fall Prevention/Protection**

**Focus Four**

**Hand and Power Tools**

**Hazard Communication**

**Hot Work**

**Lockout/Tagout**

**Machine Guarding**

**Occupational Noise**

**Overhead Cranes**

**Personal Protective Equipment- Construction**

**Personal Protective Equipment- General Industry**

**Portable Fire Extinguishers**

**Powered Industrial Trucks**

**Respiratory Protection**

**Scaffolds**

**Silica**

**Stairways and Ladders**

**Trenching and Excavations**

**Walking/Working Surfaces**

Additionally, PA OSHA Consultation conducts [\*\*\*quarterly webinars\*\*\*](#) on prevalent topics in safety and health. These webinars are performed by our experienced safety and health consultants and may be viewed live during the presentation or the video and materials are available after via our website.

These materials may be found at <https://www.iup.edu/pa-oshaconsultation/webinars/> .

**PA OSHA Consultation also hosts a Facebook and Twitter account.** Weekly our consultants will post news and safety and health related articles that will be useful to employees and employers.



The Facebook account may be found at

<https://www.facebook.com/Pennsylvania-OSHA-Consultation-Program-548810235234647/>



Twitter account is at [https://mobile.twitter.com/pa\\_osa](https://mobile.twitter.com/pa_osa)