

<p>Question Posed Prior to 4/30/2020 Manufacturing Webinar</p>	<p>Our Best Answer/ Explanation</p>
<p>Should we be taking the risk of performing industrial hygiene sampling during COVID-19?</p>	<p>For regularly scheduled (programmed) IH sampling and/or employee monitoring (i.e., formaldehyde sampling) there appears to be some guidance via the 4/16/20 "Enforcement Discretion" memo and examples listed in the Annex: https://www.osha.gov/memos/2020-04-16/discretion-enforcement-when-considering-employers-good-faith-efforts-during . For example, in many of the exceptions for training on time, performing audits, or performing audiograms or spirometry testing provided in the Annex, they list the challenge of physical distancing during the performance of these activities - which is potentially similar for IH sampling. For those items, the memo states that the employer shall undertake good faith efforts to ensure "rescheduling," and "implementation of alternative controls." The exception to this would be if there was an emergent concern (aka symptoms or complaint) that might need to be addressed sooner. A trained CIH should be consulted to determine appropriate measures for sampling during this time. Also consider: It depends, if performing sampling is a requirement due to over exposure to a substance specific substance then "yes," however, you must consider if your current workplace is unchanged from when the original sampling was performed. Are supplies to perform sampling available, is your lab open and accepting samples? All these aspects should be assessed and documented. If you can't get samples analyzed, then you need to document that conditions are unchanged in employee exposure and document that you are unable to perform the sampling due to disruption by COVID19. If worker exposure has changed due to work intensity or changes in employee physical density, then sampling could indicate that employees are no longer over exposed. You may need to do sampling where the employee puts on the sampling equipment with supervision from a distance. https://www.osha.gov/memos/2020-04-16/discretion-enforcement-when-considering-employers-good-faith-efforts-during</p>
<p>If there is any follow up material such as the guidelines, checklists, etc. these would be helpful to have as reference.</p>	<p>www.oshainfo.gatech.edu/resources ; https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-small-business.html</p>
<p>Interested in work resumption guidance</p>	<p>Basis of presentation and slide deck, but if you need additional guidance, please request a virtual visit with our safety and health team at www.oshainfo.gatech.edu</p>

Do you recommend all employees be required to wear a face mask?	Depends on the risk and if employees have to be in close proximity. If employees can distance themselves or if barriers are in place, then face masks may not be necessary. CDC provides advice on facemasks in public settings and where distance cannot be achieved, however OSHA does not have ruling of mandatory use.
How long should we conduct screenings? What is the recommended timelines for bringing individuals back from working remotely?	The current guidance remains that 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 AND between employees and others if state and local health authorities recommend the use of physical distancing strategies. (Source: OSHA) If the state and local health authorities change their guidance on continued need to physically distance and use face coverings, that would be a potential signal to reevaluate bringing individuals back to the office as usual.
Required vs. recommended vs. best practices for manufacturing facilities	Basis of presentation and slide deck; still need to adhere to OSHA standards for PPE, respirators, recordkeeping; safety regulations. CDC offers many best practices; however, if employees are becoming infected due to practices in the workplace then the facility could be cited under OSHA. Please refer to this website for OSHA standards that apply to COVID-19: https://www.osha.gov/SLTC/covid-19/standards.html
Where and how can we obtain N-95 masks?	OSHA provides enforcement guidance on extended use and reuse of respirators: https://www.osha.gov/memos/2020-04-03/enforcement-guidance-respiratory-protection-and-n95-shortage-due-coronavirus . Additionally, other approved respiratory protection devices may be used (refer to https://www.cdc.gov/coronavirus/2019-ncov/hcp/respirators-strategy/crisis-alternate-strategies.html as well as the counterfeit respirator list: https://www.cdc.gov/niosh/npptl/usernotices/counterfeitResp.html)
What are OSHA requirements—an employee has had a family member test positive—they are self-quarantining. Other than notification to employee and additional cleaning, what else needs to happen.	Check out this guidance: https://gamep.org/steps-to-take-when-employee-tests-positive-for-covid-19/
How long will the 6 ft. rule be in place? There is no answer, or until the COVID -19 is controlled with vaccines	Federal and state health departments will provide guidance as more information is produced.

Can we make facemasks mandatory?	Yes, you can make facemasks mandatory in your facility. However, it is suggested to include them in your PPE assessments. However, if respirators are used it is also mandatory that the facility adhere to the contents of the Respirator Standard 1910.134
Recommendations for handling reentry of personnel who have had COVID-19 and/or cared for someone who did to reduce stress for them and others.	Reintroduce slowly, if possible. If employees have been able to successfully work at home, then continue that practice. Recommendations also include rotating shifts and implementing engineering controls to partition employees and increase ventilation before employees return to work.
Overall Safety Guidelines	Follow all applicable OSHA standards; lockout tagout, fall protection, confined space
Requirements for warehouse operations?	Same guidance pertains as for other industry: physical distance, cleaning, managing of symptomatic employees, etc. Pay special attention to cleaning of shared surfaces (forklift steering wheels, keys, etc.). If there are logs that must be maintained, avoid sharing pens, clipboards, etc. EPA and CDC have issued (29 April) new guidance on cleaning and disinfecting public spaces, workplaces, businesses, etc. https://www.epa.gov/coronavirus/guidance-cleaning-and-disinfecting-public-spaces-workplaces-businesses-schools-and-homes
How to best screen employees?	Those who are monitoring temperatures should be provided with proper PPE, e.g., face shields, gloves, respirator, be trained on how to use it, change it, care for it. Applicable OSHA standards also may come into play such as respirator and PPE standards. A recommended practice would be to perform non-contact screening and then follow-up screening with higher validity thermometers for employees who read above the initial temperature limit.
How to best deal with employee concerns about how others are behaving as they have observed (dealing with rumors!)?	Listen closely and follow up. Provide training on new COVID-19 practices and perform audits to ensure that employees are following precautions and new practices.

I would like to know differences between OSHA requirements and CDC requirements for respirator guidance.	OSHA requirements are always going to pertain to protection of employees in the workplace and the employers' obligations. CDC guidance on respiratory protection is going to include recommendations for workplaces AND community. For example, CDC guidance is currently that ALL individuals who are unable to maintain a social distance of 6' or more use cloth facemasks (NOT respirators)—all respirators are to be directed to situations where the level of risk requires protection for the wearer. OSHA requirements for respiratory protection will follow the same type of risk assessment for whether an employee NEEDS a respirator due to the level of risk of the job task. For the purposes of this current situation, refer to the information in the blue-shaded box at https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/meat-poultry-processing-workers-employers.html
Does OSHA have a stance on CDC DIY masks?	For Meat Packing and Poultry Processing, please refer to the blue-shaded box at https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/meat-poultry-processing-workers-employers.html which specifically addresses this issue.
What will be the recommended masks by OSHA in the workplace	Depends on the hazard and risk to the employee. If employees are in high contact areas, it may be necessary for a respirator.
Face mask and respirator guidance.	CDC recommends guidance on face masks and OSHA regulates aspects of respirator use through 1910.134. Both agencies have issued guidance on addressing use during the pandemic. Our COVID-19 Resource page includes links to both Web sites and to several of their communications on these issues: https://oshainfo.gatech.edu/shes-covid-19-resource-page/
Social/physically distancing guidance on mfg. floor	Guidance says 6 feet apart or engineer in partitions of some sort. Refer to the chart/diagram on the interim meat-packing and poultry guidance document https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/meat-poultry-processing-workers-employers.html