Recommended Controls to Reduce Worker Exposures to COVID-19

The USW’s Health, Safety & Environment Department continues to identify and support COVID-19 health and safety controls to assist in slowing and stopping the likelihood of workers contracting this virus. Some of these control measures are in place at USW-represented workplaces, and in some locations, they are working on implementing these protections.

Congratulations to USW local unions involved in the implementation of the protective measures. The USW is sharing what we have learned – illustrating how the “hierarchy of controls” put into practice protects our members and others in our workplaces.

Although particular controls may not work for all workplaces, we will continue to monitor and share controls and practices as a way of exchanging experiences, ideas and insights for safer workplaces as well as for building collective approaches and a stronger union.

Action Plans

- Development of an Infectious Disease Preparedness, Response and Control Plan with worker and union involvement, including a section for a potential spike in infection rates and action plans.

- Some workplaces are or will be returning to work. Prior to start-up, a management representative from the location should acknowledge that the employer’s start-up action plans be taken or planned, and have been completed accordingly. This acknowledgment should be documented in a Start-up Check Sheet and Acknowledgement sheet. Where any satisfactory acknowledgment (Yes response) on the form is not feasible, alternative actions should be determined, approved by the employer’s highest ranking safety official, and implemented; if those too are not feasible (No responses), re-starting should be prohibited. Employers, workers and their representatives must assess jobs/tasks for physical distancing and respond appropriately. As a last resort, if satisfactory distancing or worker protection (using the hierarchy of controls) cannot be achieved, the jobs/tasks should not be restarted.

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Engineering Controls

- Electronic Touch Screens – Computers, Tablets, Biometrics, etc.
  - Discontinue use of touch biometrics – use other means to clock in/out (see below)
  - Issue workers their own stylus pen for personal use
  - Provide alcohol-based wipes or sprays containing at least 70% alcohol and stored at stations for use on stylus pens and touch screens

- Provide No-Touch Doors and Bathrooms
  - Install motion activated:
    - Doors (where applicable)
    - Faucets
    - Paper towel dispensers
    - Foot pedal operated sinks and trash cans

- Discontinue use of turnstiles when entering and exiting the workplace – use large gates with ramped up security measures

- Increase outside air to ventilation systems wherever possible. Verify that outside air dampers are working on air handlers and are at least at minimums. If demand control outside air systems exist, change their set points to allow for more outside air. If economizer mode systems are installed verify that they are functioning.
  - If filters are changed make sure that this is done after hours with systems off and with personnel wearing proper PPE. Treat filters as infectious waste and make sure they are immediately bagged. Disinfect air handlers periodically along with air conditioning condensate drain pans.
  - Reference documents include: It is best for the ventilation system to run in 100% exhaust mode. https://www.epa.gov/coronavirus/there-hvac-guidance-building-and-maintenance-professionals-can-follow-help-protect-covid

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- Special ultraviolet germicidal lamps can be an effective means to disinfect surfaces including inside of air handlers.
  https://spaces.hightail.com/receive/9fg8xFwnJs/ZXJpY0Blcmljd29vZHJvb2YuY29t

- Use headset with noise reduction and microphones to improve communications and do on-the-job training (ideally, each person will have their own headset). Equipment must be kept clean and disinfected.

- Install and use pneumatic tubes (or capsule pipelines; also known as pneumatic tube transport) to share paperwork. These systems move cylindrical containers through networks of tubes by compressed air or by partial vacuum and prevent close contact.

- Using mobile devices to text supervision who will clock workers in and out of their shifts. This has eliminated the need for workers to use time clocks or computers, and the crowds around them

- Where applicable and in accordance with employer policies, using smart phones to report safety and health concerns to cut down on shared computers and maintain physical distancing

- Installing protective plexiglass screens where possible between workers in control rooms and other applicable areas to increase physical distancing

- Extra parking areas provided with additional entrances and exits. This allows workers to use their own cars to get close to the workplace, rather than having to ride transport that could require them to be in close contact with others.

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- Mobile work-site trailers are brought in to provide additional spaces for offices, break areas, locker rooms, training and more – reducing crowded areas and allowing for at least 6-foot distancing while inside the trailers.

**Administrative Controls**

- Negotiated paid leave, voluntary layoff, etc. for COVID-19 related absences so workers do not have to choose between a paycheck and risking spread of the virus to others

- Negotiated COVID-19 absentee policies to keep workers home who are sick, have developed symptoms or were in close contact with a confirmed or suspected case; or they are high-risk. All should be eligible for sickness and accident benefits, sick days; FMLA and any other appropriate negotiated and paid leaves (in addition to any federal or state legislation that applies).

- Utilizing contract safety language, procedures and employer policies to speak up with collective support and take action around unsafe work without the fear of discrimination or harassment, including stop job/task authority

- COVID-19 related grievances are expedited for prompt resolution

- Employers notifying union representatives and workers of suspected and confirmed COVID-19 cases, while maintaining protections under privacy laws. Workers who have had close contact with those who have tested positive or showing symptoms of COVID-19 should engage in a 14-day quarantine, with pay and benefits.

- Negotiated wellness and fever checks in ways that keep at least 6 foot distance and more if possible.

- Temperature checks with a no-touch instrument for all who come to a workplace, including visitors, while still in their cars. When using these kinds of instruments be aware of the design focal length at which they are accurate, some are designed for being inches away and some for greater distances. Failure to use these at the right distances makes for inaccurate temperature readings. Try not to use industrial units with lasers, these can be dangerous to someone’s eyes.

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- In addition, verbal confirmation of health status from each person. The person using the instrument is in protective clothing and a respirator. Calibration, training and accuracy of the instrument must follow the manufacturer’s guidelines. Disposable temperature sticks can be an alternative.

- Explore using smart phones with “Body Temperature Apps” as part of an overall Infectious Disease Preparedness, Response and Control Plan. They should only be used for recording data. Some claim to take temperatures on the phone or with an external probe, but they are too inaccurate, to imprecise, or require touching the individual.


- Local unions and employers working together to identify potential upset conditions of critical operations and systems. This includes, but not limited to: staffing levels, boilers and critical gas fired operations, supply chains/parts, periodic, preventative and periodic maintenance, supplies, PPE, etc. that could/should cause operations to cease.

- Pushing back or scale down maintenance shutdowns or outages, except where essential or required by insurance

- Employers are providing union reps with paid employer time to meet (physically distanced) with members to increase communications and problem solve. Some local union officers are dealing solely with membership concerns and issues involving COVID-19 on a full-time basis. These reps are raising issues and working to solve concerns with employers on conference calls.

- Increase Union – Management leadership meetings via phone and/or WebEx (daily, every-other-day, three times per week, etc.)

- Holding workplace meetings via conference calls or doing them virtually using online platforms

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Administrative Controls (continued)

• Conduct worker and union rep-involved risk assessments of jobs/tasks to identify where and when workers come in less than 6 feet of each other, and redesign jobs and tasks to prevent this close contact. Where workplace changes are made, it must not create other hazards. For example, ergonomic stressors, having people working alone, unless there is at least one other person in seeing or hearing distance above the ambient noise.

• Installing markings with cones, painted lines or tape on the floor and signage to ensure at least 6 foot distance between people

• Negotiated staggering shift times and/or modified shifts to reduce personnel in the same space, at the same time

• Negotiated staggering breaks and meal times, to reduce personnel in the same space at the same time

• Adjusting break/conference room tables and chairs to maintain at least 6 foot physical distancing

• Delivery drivers stay in their trucks and do not enter the workplace using alternative communication procedures. The workplace also provides portable and maintained restrooms for these workers

• Training conducted by a variety of means including in-person (but keeping at least 6 foot distance), videos, written materials and computers. Training must continue to be in the language(s) and literacy level(s) of the workforce. Note: computer-based training is a limited tool and used only to supplement, not replace other trainings mentioned above.

• Slower speeds and production standards that allow for jobs to be done with at least 6-foot physical distancing and that allow for additional time for frequent handwashing

• Purchasing or renting more powered industrial trucks and vehicles to support one-person-to-a-vehicle policies. Extra time for cleaning if different people on different shifts will use vehicles, etc.

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• Adding additional, or portable, handwashing stations with soap and paper towels (motion or foot pedal activated). Workers must have the right to wash their hands or use hand sanitizer frequently.

• Buying hand sanitizer in bulk quantities (5 to 55-gallon drums) and dispensing it into smaller containers for workstations

• Making homemade hand sanitizers that follow the World Health Organizations guidelines https://www.who.int/gpsc/5may/Guide_to_Local_Production.pdf

• Putting In-house cleaning and disinfecting crew(s) put in place. Ample supplies of EPA listed disinfectants that can kill coronavirus, along with proper training and PPE. Cleaning schedule based on the size of the workplace and shifts in operation

• Developing checklists of areas that need cleaning and disinfecting, including mobile equipment, handrails, tools, machinery and controls, and a timetable for frequent cleaning; and ensuring that there is appropriate staffing to carry out tasks. https://www.usw.org/members/coronavirus-resources/resources/covid-19-disinfectants

• Purchasing cleaning chemicals that are effective in killing this virus but less hazardous and will not cause asthma, skin rashes, and other hazardous conditions. https://osha.washington.edu/sites/default/files/documents/FactSheet_Cleaning_Final_UWDEOHS_0.pdf

Personal Protective Equipment

• Respirators – Many workplaces have donated their supply of N95 respirators and other respirators to healthcare workers due to the short supply. We continue to encourage everyone to do so. Non-healthcare workers who need to use respiratory protection for other hazards, should continue to do so. https://www.osha.gov/laws-regps/regulations/standardnumber/1910/1910.134

Be aware of procedures for Donning (putting respirators on) and Doffing (removing them) along with fit testing. https://www.youtube.com/watch?v=kdqcKHSIrrM
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- Gloves – Be careful in selecting the proper types of gloves and in putting them on and removing them. [%PUBLIC%](https://www.youtube.com/watch?v=xTYioOo__6U)

**Additional Information**

- ‘Homemade’ cloth face coverings are only one part of a comprehensive infectious disease prevention and response plan who have to be at work. There is no way to determine the effectiveness of these loose fitting coverings. These coverings do not have any “approval” standards, testing, certification, or labeling requirements as PPE. Moreover, cloth face coverings do not do much to protect the wearer. The virus is sometimes carried by tiny particles that easily pass through cloth. However, a cloth face covering does help protect other people if the wearer has the virus and does not know it. A cloth face covering can catch big droplets from coughs and sneezes. It also slows down the tiny particles, so they do not project as far– they are essentially a source control.

  Make sure face coverings can be laundered and machine dried without damage or change to the shape. There has been a lot of false information released about cleaning cloth face coverings; including microwaving and sealing in a Ziplock bag. This could cause damage to the covering and might not even work. A washing machine or hand washing with soap and hot water works well. [%PUBLIC%](https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/diy-cloth-face-coverings.html) Cloth face coverings may give a false sense of security. They do not replace any of the other controls. Social distancing, frequent surface sanitation, hand washing, and other measures are still critically important.

*We recognize these controls may not work for all workplaces, we will continue to share controls and practices as a way of exchanging experiences, ideas, insights for safer workplaces as well as building a stronger union.*

*If you have controls you’d like to share with the USW’s Health, Safety & Environment Department, please email them to safety@usw.org*

More information is available at [%PUBLIC%](WWW.USW.ORG/COVID19)