HBI SAFETY & HEALTH MANAGEMENT PLANS

COVID-19 Cleaning Crew Health & Safety Considerations

Concern over the spread of COVID-19 (coronavirus) has led many companies to expand daily and deep cleaning activities. In addition to the expanded cleaning efforts underway many businesses are using new chemicals or more powerful or concentrated cleaning solutions to clean and disinfect their facilities. Consequently, employees responsible for these cleaning activities may be exposed to infectious materials and chemicals for which they are not fully prepared. Employers should review and consider the protective measures necessary for dealing with the sanitation activities required for COVID-19 response.

OSHA recommends that workers who conduct cleaning and sanitization tasks be protected from potentially infectious materials including potential COVID-19 contamination. Protection from exposure to infectious materials is covered under OSHA's Bloodborne Pathogens standard (29 CFR 1910.1030). OSHA also mandates that employees be protected from exposure to hazardous materials, including cleaning supplies, through the Hazard Communication standard (29 CFR 1910.1200). Both infectious material and hazardous chemical protections rely heavily on PPE measures which are detailed in OSHA 1910 Subpart I.

Part of every employer's safety review before beginning enhanced cleaning and sanitization work should include a review of applicable OSHA regulations. This review should be completed prior to assigning work and then reviewed with all exposed or affected workers. All employees are entitled to a workplace safe from recognized hazards by the OSHA General Duty Clause.

According to the Bloodborne Pathogens regulations when the potential exists for exposure to human blood, certain body fluids, or other potentially infectious materials employers must:

- Provide workers with training including information about how to recognize tasks that may involve exposure and the methods to reduce exposure
- Provide employees with reasonable protective measures and PPE
- Create a written exposure control plan, a document used as a source of information for answering bloodborne pathogen-related questions and to help ensure exposure control activities are in place
- Monitor employee health and provide any health care required due to workplace exposures

Under OSHA's Hazard Communication Standard, employers are required to make employees aware of possible chemical or materials hazards and the necessary precautions required for work with those materials, employers also must:

- Obtain Safety Data Sheets (SDS) from providers of hazardous chemicals and make these SDS accessible to the workers
- Ensure that materials are properly labeled
- Provide for proper use and storage conditions
- Provide training relevant to each chemical or material hazard including the methods by which an employee can reduce or prevent exposure
- Provide any health care treatment or monitoring required as a result of chemical exposure
- Create and maintain written exposure control plans as well as work plans for hazardous materials and tasks utilizing those materials including non-routine and emergency work processes

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While most employers are familiar with OSHA's PPE Standard there are some special considerations that employers need to be aware of during the COVID-19 pandemic response:

- Employers must perform and document a hazard assessment of the workplace to determine if hazards exist that make PPE necessary
- Employers must provide all specialty PPE required
- Employers are required to provide training to employees on the proper use, selection, care, and limitations of PPE
- Employers are also responsible for completing any additional PPE tasks referenced by other OSHA standards

We encourage all employers to engage with their safety processes to determine the best protections for their employees during this disruptive time. As your trusted partner Henderson Brothers will continue to provide expert advice on the COVID-19 outbreak as it relates to employee health and safety.

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