#  EPA COVID-19 Job Hazard Analysis (JHA) Supplement

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## Introduction

* The COVID-19 Public Health Emergency is very dynamic. Federal, state and local government guidance is updated frequently. There may be new CDC, OSHA or EPA guidance that will impact the current content of this JHA prior to the next update. As a result, *it is important to review the government links in this JHA for new information*. Additionally, due to possible differences in state or local health department requirements on COVID-19, the employee, supervisor and the SHEMP manager should review applicable state/local requirements before traveling and deployment to a site. These state/local requirements may be more flexible for essential workers that are traveling into the area, and EPA travel for field work may qualify as such essential travel.
* Prior to travel, assess the prevalence for [COVID-19 cases in the area(s) you are traveling to (and through)](https://covid.cdc.gov/covid-data-tracker/#cases_casesper100klast7days) in addition to where you will be performing site work. This assessment should include evaluation of whether the area has demonstrated a downward trajectory of positive tests and documented cases within a 14-day period. Including this will help staff determine how to “assess the prevalence.”.
* Specific COVID-19 information can be found on [state/territorial/local government and health department websites](https://www.cdc.gov/coronavirus/2019-ncov/php/open-america/hd-search/index.html). Available sources include the [CDC COVID-19 Tracker](https://covid.cdc.gov/covid-data-tracker/#cases_casesper100klast7days), [Johns Hopkins University Coronavirus Resource Center](https://coronavirus.jhu.edu/), [the COVID Tracking Project](https://covidtracking.com/data)1, the [U.S. Census Bureau’s Coronavirus (COVID-19) Pandemic Site](https://www.census.gov/topics/preparedness/events/pandemics/covid-19.html) and other expert sources.

1 Non-federal sites are included for informational purposes only and do not constitute any endorsement.

* Employees in consultation with their supervisor and SHEMP manager should use this JHA Supplement as a template to address COVID-19 health concerns. The Agency recommends this JHA Supplement be used for all field work until such time that the COVID-19 public health emergency is over.

## OSHA Worker Exposure Risk to COVID-19, Summary

[OSHA Guidance on Preparing Workplaces for COVID-19](https://www.osha.gov/Publications/OSHA3990.pdf) provides four COVID-19 exposure risk categories. The use of the term “workers” below includes EPA field staff that are on location or in transit to facilities/sites or field locations.:



* **Very High Exposure Risk**
	+ Very high exposure risk jobs are those with high potential for exposure to known or suspected sources of COVID-19 during specific medical, postmortem, or laboratory procedures.
	+ Workers in this category include:
		- Healthcare workers (e.g., doctors, nurses, dentists, paramedics, emergency medical technicians) performing aerosol-generating procedures on known or suspected COVID-19 patients.
		- Healthcare or laboratory personnel collecting or handling specimens from known or suspected COVID-19 patients (e.g., manipulating cultures from known or suspected COVID-19 patients).
		- Morgue workers performing autopsies, which generally involve aerosol-generating procedures, on the bodies of people who are known to have, or suspected of having, COVID-19 at the time of their death.
	+ Personal Protective Equipment (PPE):
		- Most workers at very high exposure risk likely need to wear gloves, a protective suit, a face shield or goggles, and either a face mask or a respirator, depending on their job tasks and exposure risks.
		- Those who work closely with (either in contact with or within six feet of) people known to be, or suspected of being infected with COVID-19, should wear respirators.
* **High Exposure Risk**
	+ High exposure risk jobs are those with high potential for exposure to known or suspected sources of COVID-19.
	+ Workers in this category include:
		- Healthcare delivery and support staff (e.g., doctors, nurses, and other hospital staff who must enter patients’ rooms) exposed to known or suspected COVID-19 patients.
		- Medical transport workers (e.g., ambulance vehicle operators) moving known or suspected COVID-19 patients in enclosed vehicles.
		- Mortuary workers involved in preparing (e.g., for burial or cremation) the bodies of people who are known to have, or suspected of having, COVID-19 at the time of their death.
	+ Heightened Engineering Controls, Administrative Controls and Safe Work Practices Recommended (Discuss with SHEMP Manager)
	+ PPE:
		- Most workers at high exposure risk need to wear gloves, a protective suit, a face shield or goggles, and either a disposable surgical mask or a respirator, depending on their job tasks and exposure risks.
		- Those who work closely with (either in contact with or within 6 feet of) people known to be, or suspected of being, infected with COVID-19 and **should wear assigned respirators**.
* **Medium Exposure Risk**
	+ Medium exposure risk jobs include those that require frequent and/or close contact with (i.e., within six feet of) people who may be infected with SARS-CoV-2, but who are not known or suspected COVID-19 patients. In areas without ongoing community transmission, workers in this risk group may have frequent contact with travelers who may return from locations with widespread COVID-19 transmission. In areas where there is ongoing community transmission, workers in this category may have contact with the general public (e.g., in schools, high-population-density work environments, and some high-volume retail settings).
	+ Engineering Controls - Install physical barriers, such as clear plastic sneeze guards, where feasible.  Administrative Controls: Consider offering disposable surgical masks to ill employees to contain respiratory secretions until they are able leave the workplace (i.e., for medical evaluation/care or to return home).
		- Where appropriate, limit public’s access to the worksite, or restrict access to only certain workplace areas.
		- Consider strategies to minimize face-to-face contact (e.g., drive-through windows, phone-based communication, telework).
	+ PPE:
		- Workers with medium exposure risk may need to wear some combination of gloves, protective suit, a disposable surgical mask, and/or a face shield or goggles.
		- PPE ensembles for workers in the medium exposure risk category will vary by work task, the results of the employer’s hazard assessment, and the types of exposures workers have on the job.
		- In the event of a shortage of masks, a reusable face shield that can be decontaminated may be an acceptable method of protecting against droplet transmission. Ensure that when using a [face shield](https://www.cdc.gov/coronavirus/2019-ncov/hcp/ppe-strategy/face-masks.html) it covers the entire face (extends to the chin or below and reaches the sides of the face).
	+ **Note that a respirator is not recommended for jobs classified at medium risk**, unless it is part of the PPE normally recommended as part of the hazard assessment.
* **Lower Exposure Risk (Caution)**
	+ Lower exposure risk (caution) jobs are those that do not require contact with people known to be, or suspected of being, infected with SARS-CoV-2 nor frequent close contact with (i.e., within six feet of) the general public. Workers in this category have minimal occupational contact with the public and other coworkers.
	+ Engineering Controls & Administrative Controls
		- Additional engineering controls are not recommended for workers in the lower exposure risk group. Employers should ensure that engineering controls, if any, used to protect workers from other job hazards continue to function as intended.
		- Monitor public health communications about COVID-19 recommendations and ensure that workers have access to that information. Frequently check the CDC COVID-19 website: [www.cdc.gov/coronavirus/2019-ncov.](https://www.cdc.gov/coronavirus/2019-ncov/)
		- Collaborate with workers to designate effective means of communicating important COVID-19 information
	+ PPE
		- Additional PPE is not recommended for workers in the lower exposure risk group.
		- Workers should continue to use the PPE, if any, that they would ordinarily use for other job tasks.
		- **Note that a respirator is not recommended for jobs classified at low risk,** unless it is part of the PPE normally recommended as part of the hazard assessment**.**

## Pre-Travel Considerations

For pending site work, identify individuals who indicate:

* 1. Feeling well and show no signs of illness.
	2. Not exhibiting any COVID-19 [symptoms](https://www.cdc.gov/coronavirus/2019-ncov/symptoms-testing/symptoms.html) listed by the CDC, including, but not limited to fever, cough, shortness of breath, or difficulty breathing.
	3. [No contact with known or presumptive COVID-19 positive individual(s) in past 48 hours](https://www.cdc.gov/coronavirus/2019-ncov/community/critical-workers/implementing-safety-practices.html). Employees who have been in direct contact with a COVID-19 affected person must notify their supervisors.
	4. Completed self-quarantine if recent known or suspected exposure to COVID-19 (Follow [CDC guidance on discontinuation of isolation](https://www.cdc.gov/coronavirus/2019-ncov/hcp/disposition-in-home-patients.html)).
	5. Willing to be onsite for project duration, wear face covering (e.g., cloth face covering, disposable surgical mask) or respirator (when required) and social distance, etc.

The employee, supervisor and the SHEMP manager should consider when EPA employees are traveling from a population center with COVID-19 cases to a population/community with fewer cases as part of the hazard assessment. Not only is there a risk of EPA staff becoming exposed to COVID-19 during fieldwork, but EPA employees could transmit COVID-19 to communities that they visit. Since many of the EPA offices are in the largest cities in their Region with COVID-19 cases, EPA staff traveling to other communities could pose a risk to those communities that may outweigh the benefit of the fieldwork. Some state/local governments may impose restrictions on outsiders traveling into their jurisdiction, and EPA staff should comply with those restrictions. The state/local restrictions may be more flexible or not apply to essential work such as EPA field work.

## COVID-19 JHA Supplement Instructions

1. Complete all information as requested on the form below, such as supervisor/SHEMP name and signature; date of JHA, JHA number, name of activity, department, location and other information (name of participating employees other than the supervisor).
2. Review the existing JHA for the task, the OSHA COVID-19 risk levels above, and the listed PPE. Check off any that apply to this job’s tasks.
3. For task steps considered OSHA Medium, High and Very High risk, list out the basic task steps, the actual COVID-19 hazard, and the projected hazard control (PPE, engineering control, administrative control).
4. Note that some but not all possible hazards are listed at the bottom of the first page, along with some possible controls.
5. Note that under the box containing the checklist of PPE is a section that documents that engineering controls and administrative controls were considered and review this section after completing the rest of the JHA.
6. Make sure to list all feasible engineering and administrative controls being considered. If they are not feasible, list the reason(s).
7. Complete the column for Basic Tasks or Steps for the job being performed. It is not necessary to list minor insignificant steps or non-COVID-19 related hazards (Non-Covid-19 hazards are included in the original JHA).
8. Complete the column for Corrective Action or Hazard Controls for each Task or Step listed. Make sure to list specific control methods such as engineering controls, administrative controls and specific PPE.
9. Consider other additional risk such as working indoors, tight spaces, performing strenuous activity or working in high heat and/or humidity environments.

**Points to remember**: This is to be used as a supplement to existing JHAs to document important controls for COVID-19 related hazards that may be present during specific work tasks. A supervisor and employee that performs the job should complete this form together; to ensure they agree as to the actual steps involved in this job, in conjunction with the local SHEMP Manager.

|  |  |  |
| --- | --- | --- |
| **Job Hazard Analysis (JHA)****COVID-19 Supplement** | **Supervisor’s Name** |  |
| **Supervisor’s Signature** |  |
| **S&H Manager Name** |  |
| **S&H Manager Signature** |  |
| **Date** |  |
| **Job/Activity Name**: COVID-19 Supplement – Attach the job specific JHA used for the job task to this supplemental JHA to document the OSHA risk level provided below for the job.  | **JHA #:** COVID Supplement to existing JHA (please attach)  |
| **Division/Branch:**  | **Area /Location(s)**:  | **Other Information** (JHA participating employees):  |
| **REQUIRED PERSONAL PROTECTIVE EQUIPMENT FOR ENTIRE JOB** ☐ Appropriate Basic PPE (Safety glasses, safety shoes, hard hat, gloves)  |
| ☐ Safety glasses  | ☐ Respirator, Type \_\_\_\_\_\_\_\_\_\_\_\_\_  | ☐ Welding gloves/ leathers  | ☐ Safety shoes  |
| ☐ Goggles  | ☐ Hard hat  | ☐ Protective suit  | ☐ Other rubber boots\_\_\_\_\_\_\_\_  |
| ☐ Face shield  | ☐ Hearing protection  | ☐ Lab Coat &/or Apron  | ☐ Portable GFCI  |
| ☐ Disposable surgical mask  | ☐ Appropriate gloves  | ☐ Fall protection  | ☐ High visibility vest  |
| ☐ Other\_\_\_\_\_\_\_\_\_\_\_\_  | ☐ Other\_\_\_\_\_\_\_\_\_\_\_\_  | ☐ Other\_\_\_\_\_\_\_\_\_\_\_\_  | ☐ Other\_\_\_\_\_\_\_\_\_\_\_\_  |

Follow the steps outlined in the EPA Self-Assessment to Stop the Spread of COVID-19 tool to make sure employees are not ill or symptomatic. Perform this self-assessment prior to departing and daily before reporting to work.

**Always consider Engineering or Administrative Controls before use of PPE.** These controls were considered: ☐YES, ☐NO, if not feasible explain why:

|  |  |  |
| --- | --- | --- |
| **Basic Tasks or Steps**  | **Hazards**  | **Corrective Action or Hazard Controls**  |
| 1.  | 1.  | 1.  |
| 2.  | 2.  | 2.  |
| 3.  | 3.  | 3.  |
| 4.  | 4.  | 4.  |
| 5.  | 5.  | 5.  |

**Comments:** This JHA is a supplement to the standard JHA that has been previously completed for typical work activities and is to be used to establish the level of COVID-19 risk. This should be used with a site Health and Safety Plan, Field Work Control Plan, Vessel Float Plan, Dive Safety Plan, etc. The level of risk determined by using this form helps to identify if additional protective equipment or work practice controls are needed due to COVID-19 risk.