

Consultants Update

COVID-19

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June 24, 2020

Discussion Topics

- OSHA's COVID-19 risk categories
- OSHA's min. requirements
- OSHA's inspection process during COVID-19
- Preparation for inspections
- OSHA Enforcements
- OSHA Recordkeeping

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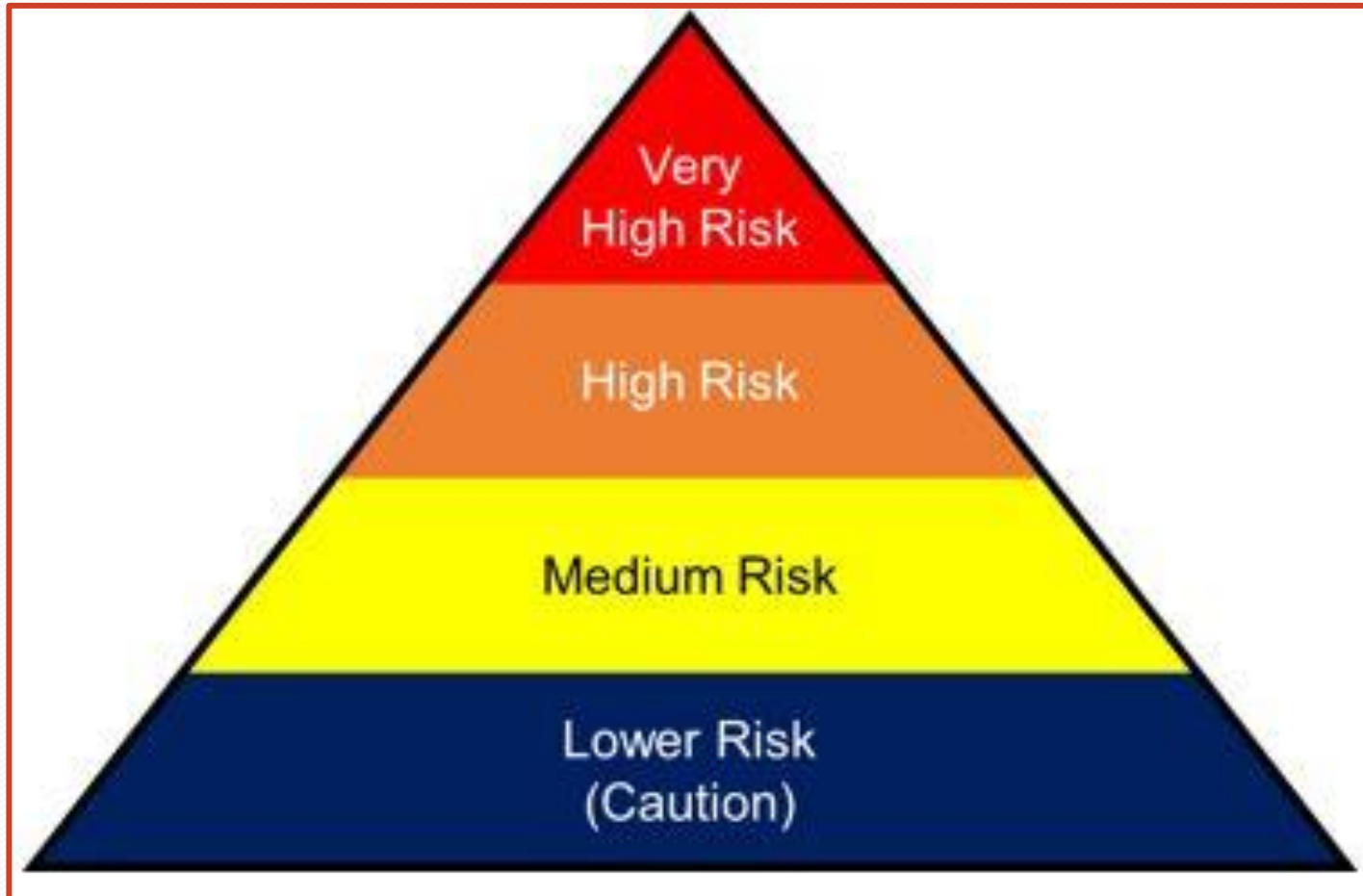
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OSHA Says:

- The General Duty Clause, **Section 5(a)(1)** of the **Occupational Safety and Health (OSH) Act of 1970**, 29 USC 654(a)(1), which requires employers to furnish to each worker "employment and a place of employment, which are free from recognized hazards that are causing or are likely to cause death or serious physical harm."

What Risk for Employees?



OSHA COVID-19 REQUIREMENTS

OSHA's Personal Protective Equipment (PPE) standards: using gloves, eye and face protection, and respiratory protection when job hazards warrant it.

Respirators = Respiratory PROGRAM!

Inspection Process

Opening Conference

Review

Pandemic Program

Hazard Assessments: use of Hierarchy of Controls!

Protocols for PPE

Respiratory protection program, if respirators used

Training Documents

Documentation of purchase and provide adequate PPE

ENFORCEMENT

- 29 CFR Part 1904, Recording and Reporting Occupational Injuries and Illness.
- 29 CFR § 1910.132, General Requirements - PPE
- 29 CFR § 1910.133, Eye and Face protection.
- 29 CFR § 1910.134, Respiratory Protection.
- 29 CFR § 1910.141, Sanitation.
- 29 CFR § 1910.145, Specification for Accident Prevention Signs and Tags.
- 29 CFR § 1910.1020, Access to Employee Exposure and Medical Records.
- Section 5(a)(1), General Duty Clause

OSHA Recordkeeping

Evidence that a COVID-19 illness was contracted at work. ... if there is no other alternative explanation , other than:

- 1. Workers work closely Together*
- 2. Illness occurred shortly after lengthy, close exposure to a particular customer or co-worker with COVID-19*
- 3. Employee's job duties have frequent, close exposure to the general public in an area with ongoing community transmission*

NOT WORK RELATED IF:

Only worker to contract COVID-19 in her vicinity and job duties do not include frequent contact with general public

if employee closely and frequently associates with someone who is

- 1. Has COVID-19*
- 2. Not a coworker*
- 3. exposes the employee during the period the person is infectious*

Contact Info

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