

EPA COVID-19 Job Hazard Analysis (JHA) Supplement, July 6, 2020, Final

Table of Contents

1. [Introduction](#)
2. [OSHA Worker Exposure Risk to COVID-19, Summary](#)
3. [Pre-Travel Considerations](#)
4. [EPA COVID-19 Job Hazard Analysis \(JHA\) Supplement Instructions](#)
5. [EPA COVID-19 Job Hazard Analysis \(JHA\) Supplement Template](#)
6. [EPA COVID-19 OLEM Job Hazard Analysis Supplement Example](#)

1. 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 \(and through\)](#) 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](#). Available sources include the [CDC COVID-19 Tracker](#), [Johns Hopkins University Coronavirus Resource Center](#)¹, the [COVID Tracking Project](#)¹, the [U.S. Census Bureau’s Coronavirus \(COVID-19\) Pandemic Site](#) and other expert sources. EPA also developed the EPA Facility Status [Dashboard](#) aid in facility reopening decisions. The Dashboard provides information on the status of each gating criterion in the commuting area surrounding our facility locations.
- 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.

2. OSHA Worker Exposure Risk to COVID-19, Summary

¹ Non-federal sites are included for informational purposes only and do not constitute any endorsement by EPA or its employees.

[OSHA Guidance on Preparing Workplaces for COVID-19](#) 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.



Occupational Risk Pyramid for COVID-19

- **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](#) 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.
- 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.

3. Pre-Travel Considerations

For pending site work, identify individuals who indicate:

- a) Feeling well and show no signs of illness.
- b) Not exhibiting any COVID-19 [symptoms](#) listed by the CDC, including, but not limited to fever, cough, shortness of breath, or difficulty breathing.
- c) [No contact with known or presumptive COVID-19 positive individual\(s\) in past 48 hours](#). Employees who have been in direct contact with a COVID-19 affected person must notify their supervisors.
- d) Completed self-quarantine if recent known or suspected exposure to COVID-19 (Follow [CDC guidance on discontinuation of isolation](#)).
- e) 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.
- f) 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.

4. EPA COVID-19 JHA Supplement Instructions:

- a) 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).
- b) 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.
- c) 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).
- d) Note that some but not all possible hazards are listed at the bottom of the first page, along with some possible controls.
- e) 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.
- f) Make sure to list all feasible engineering and administrative controls being considered. If they are not feasible, list the reason(s).
- g) 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).
- h) 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.
- i) 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.

5. EPA COVID-19 Job Hazard Analysis (JHA) Supplement - Template

	Job Hazard Analysis (JHA) COVID-19 Supplement	Supervisor Name:	
		Supervisor Signature:	
		SHEMP Manager Name:	
		SHEMP 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			
<input type="checkbox"/> Appropriate Basic PPE (Safety glasses, safety shoes, hard hat, gloves)			
<input type="checkbox"/> Safety glasses	<input type="checkbox"/> Respirator, Type _____	<input type="checkbox"/> Welding gloves/ leathers	<input type="checkbox"/> Safety shoes
<input type="checkbox"/> Goggles	<input type="checkbox"/> Hard hat	<input type="checkbox"/> Protective suit	<input type="checkbox"/> Other rubber boots _____
<input type="checkbox"/> Face shield	<input type="checkbox"/> Hearing protection	<input type="checkbox"/> Lab Coat &/or Apron	<input type="checkbox"/> Portable GFCI
<input type="checkbox"/> Disposable surgical mask	<input type="checkbox"/> Appropriate gloves	<input type="checkbox"/> Fall protection	<input type="checkbox"/> High visibility vest
<input type="checkbox"/> Other _____	<input type="checkbox"/> Other _____	<input type="checkbox"/> Other _____	<input type="checkbox"/> 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.

6. EPA COVID-19 OLEM Job Hazard Analysis Supplement - ILLUSTRATIVE EXAMPLE

	Job Hazard Analysis (JHA) COVID-19 Supplement (OLEM EXAMPLE)	Supervisor Name:		
		Supervisor Signature:		
		SHEMP Manager Name:		
		SHEMP 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: SEMD/ERRB	Area /Location (s): Removal Site, COVID-19 Medium Risk	Other Information (JHA participating employees):		
REQUIRED PERSONAL PROTECTIVE EQUIPMENT FOR ENTIRE JOB				
<input checked="" type="checkbox"/> Appropriate Basic PPE, (Safety glasses, safety shoes, hart hat, gloves)				
<input type="checkbox"/> Safety glasses	<input type="checkbox"/> Respirator, Type _____	<input type="checkbox"/> Welding gloves/ leathers	<input checked="" type="checkbox"/> Safety shoes	
<input checked="" type="checkbox"/> Goggles	<input checked="" type="checkbox"/> Hard hat	<input checked="" type="checkbox"/> Protective suit	<input type="checkbox"/> Other rubber boots _____	
<input type="checkbox"/> Face shield	<input type="checkbox"/> Hearing protection	<input type="checkbox"/> Lab Coat &/or Apron	<input type="checkbox"/> Portable GFCI	
<input checked="" type="checkbox"/> Disposable surgical mask	<input checked="" type="checkbox"/> Appropriate gloves	<input type="checkbox"/> Fall protection	<input checked="" type="checkbox"/> High visibility vest	
<input type="checkbox"/> Other _____	<input type="checkbox"/> Other _____	<input type="checkbox"/> Other _____	<input type="checkbox"/> 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. Vehicle Travel	Contact with person infected with COVID-19, potential spread to others (Note: Same hazard for all activities)	<ul style="list-style-type: none"> a) For EPA or rental vehicle, follow EPA Disinfection Guidance (EPA OMS-SSD Vehicle Utilization, Cleaning, and Disinfecting Recommendations 4/27/20). b) Obtain adequate EPA-registered disinfectants and hand sanitizers for duration of project (vehicle disinfection kits) from Regional or Program equipment/supply managers. c) Clean and disinfect “common touch” vehicle surfaces, e.g., door handles, console, touch screen, steering wheel, inside of door, before and after use. Disinfect/sanitize before and after use by new driver. d) For EPA-owned or rental vehicle, document name and date of initial disinfection/sanitization. e) Travel should be limited to one person per vehicle. If the project requires multiple personnel in one vehicle, don cloth face covering or disposable surgical mask, maximize outside air flow and attempt to separate occupants by at least six feet. f) Minimize fuel fill-ups: wear nitrile gloves and use cloth face cover or disposable surgical masks, when within six-feet of another person; if not wearing gloves, use disinfectant wipe on gas station touch screen before and after use.
2. Air Travel		<ul style="list-style-type: none"> a) Purchase online electronic ticket to limit unnecessary social interactions in airport. b) Practice social distancing and use a cloth face covering in airport and on plane. c) Avoid touching surfaces but when necessary use hand sanitizer or wash hands with soap and water if available. d) Social distancing may not be possible due to proximity of other passengers in plane. When possible choose window seat and try to sit at least two rows or two seats away from other passengers. e) Limit trips to bathroom. f) Wipe down common touch surfaces, e.g., seat cover, tray table, armrest, seat-back pocket, headrest, seat-back screen, overhead air vent, in-flight entertainment screen with EPA List N approved disinfectant or wear gloves. Travel kits should be provided to employees on official government travel. g) Current information supports directing air from air vent directly at you in order to create positive pressure envelope (Commercial aircraft use HEPA filter zones). h) For other public travel (cab, bus, and train, etc.), wearing a cloth face covering is required to help protect others and carrying approved disinfectant for

Basic Tasks or Steps	Hazards	Corrective Action or Hazard Controls
Site Work, continued	<p>Contact with person infected with COVID-19, potential spread to others (Note: Same hazard for all activities)</p>	<ul style="list-style-type: none"> h) Require face coverings for all outdoor operations where social distancing cannot be consistently maintained. Similar to administrative and engineering controls implement during Level A, B and C PPE use, if the face covering causes a hazard to a worker (e.g. heat and physical stress while performing strenuous work), implement administrative or engineering controls to limit the hazard caused by the face covering. If field activities prevent social distancing (e.g. assisting in donning and doffing of PPE, composite water sampling), use of a cloth face covering is recommended. i) Even when social distancing is maintained, EPA recommends following the respective state or local jurisdiction. j) Site personnel should always routinely carry a small container of hand sanitizer with at least 60% alcohol, a face covering that covers the nose and mouth, and nitrile gloves. k) In indoor residential environments, site personnel cannot control actions of resident(s). Face coverings are required for all work in residential properties. Site personnel should avoid surface contact whenever possible and should wear nitrile gloves. With the permission of residents, site personnel should wipe down all surfaces that were touched by them before departing residence. l) For site work that involves multiple locations, disinfect or replace equipment, PPE, and personal items before moving to next location. m) Do not shake hands. Use other forms of non-contact greeting. n) Avoid touching face. o) Site personnel should be attentive to handwashing upon arrival at the site, after exiting exclusion zone, prior to taking a break, prior to eating lunch, after use of the bathroom, using shared items and upon leaving the site for the day, etc. Encourage adherence to prescribed handwashing guidelines. p) Augment site handwashing equipment. Make sure soap and water handwashing facilities are readily available onsite. Do not rely on hand sanitizer alone. q) Avoid sharing items with others. This includes personal items such as pen and paper. r) When equipment must be shared (e.g., monitoring and sampling equipment), disinfect touch surfaces (following manufacturer’s instructions) before providing to other individual for use and wear nitrile gloves.

Basic Tasks or Steps	Hazards	Corrective Action or Hazard Controls
	Contact with person infected with COVID-19, potential spread to others (Note: Same hazard for all activities)	<ul style="list-style-type: none"> s) Whenever PPE such as protective suits, boots, air-purifying respirators are needed, attempt to don PPE without an attendant. If an attendant is needed, the attendant should wear a face covering and nitrile gloves. t) When trailers are necessary, separate smaller trailers are preferable to single large trailers in order to facilitate separate space and social distancing of personnel. u) When weather permits, store equipment outside to limit confinement of personnel and number of entries and exits from trailers. v) When possible, use Skype, MS Teams or other virtual communications tools to limit personnel meetings. w) Site trailers, command post, port-a-johns, handwash stations, etc. must be cleaned and disinfected with an EPA List N approved disinfectant daily or more frequently with high use, with special attention to common touch points. x) For rental of select items (e.g. port-a-johns), periodic disinfection may be included. When this is not the case, select site personnel will be designated with this responsibility. y) Do not share respirators or cartridges.
If recommended actions indicated in this JHA are not being followed on-site, please point out importance of following JHA to non-compliant workers. Report any incidents of non-compliance to the Site Safety Officer and/or Site Supervisor.		

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.