

POLICY: Town of Wallingford, VT

COVID-19 Program and Exposure Control Plan

PURPOSE: The purpose of the COVID-10 Program and Exposure Control Plan (hereafter called Control Plan) is two fold:

1. To continue to protect the health and safety of our work force and by extension their families, and
2. To implement the **Mandatory Health and Safety Requirements for all Business, Nonprofits & Governmental Operations** as required by the Vermont Department of Health, Centers for Disease Control and Prevention (CDC) Guidelines, Vermont Occupational Safety and Health Administration (VOSHA) and The Vermont Agency for Commerce and Community Development. Using the measures provided by these agencies, the Town of Wallingford (Town) will strive to protect the health of our employees. This program will document the measures we use to comply with the provided guidelines.

DEFINITIONS:

COVID-19 - COVID-19 is a respiratory disease spread from person to person. SARS-CoV-2 is the virus that causes COVID-19.

RESPONSIBILITIES:

Health Officer:

Mandatory – All businesses must have a designated Health Officer for all shifts:

- Responsible for ensuring compliance with the Executive Order and the Addenda thereto and applicable ACCD Guidance.
- This person shall have the authority to stop or modify activities to ensure work conforms with the mandatory health and safety requirements

Town designated Health Officer(s) are the road foreman for the Highway Department, Jim Regula for the Transfer Station and the town administrator for Town Hall (or the town clerk and treasurer while the town administrator is working remotely).

The Health Officer in each department is responsible for the administration of the Control Plan including the following;

- Assess the hazards in this workplace (see Hierarchy of Controls in this document).
- Administer and update this program as necessary (with Selectboard final approval).
- Regularly review guidance from Agency of Commerce and Community Development (ACCD) and adhere to any updates.
- Review the effectiveness of this program.
- Participate in any investigation of employee complaints, failure to comply with Town rules.
- Provide effective training reference COVID-19 and the preventive measures the Town has taken and that the employee must follow.

Department Supervisors – Road foreman, Jim Regula and the town administrator

- Ensure that all employees follow the protective measures outlined in this program.
- Enforce compliance with this program using the existing disciplinary structure outlined in the Employee Handbook.
- Ensure training for COVID-19 protections has been completed and documented in accordance to the ACCD guidance.
- Those employees without an immediate supervisor – including assessor, zoning administrator and summer recreation co-directors – shall follow instructions detailed in this Control Plan.

Employees

- Follow all rules and practices created by the Town, including, but not necessarily limited to:
 - Participate in all trainings relative to COVID-19
 - Stay home if you are sick
 - Wash hands frequently
 - Practice Social Distancing – 6 foot minimum
 - Report to your Supervisor if you feel sick, have a temperature, or you have had close contact with a person suspected of having COVID 19
 - Wear protective PPE as outlined by the Town
 - Wear protective cloth mask as outlined by the Town
 - Temperature checks before every shift
 - Maintain a visitor log

EXPOSURE DETERMINATION - General Information

- ❖ This information is provided from the VOSHA's Mandatory Health and Safety Requirements for all Business, Nonprofits & Government Operation as required by the Vermont Dept of Health, CDC Guidelines and VOSHA <https://labor.vermont.gov/VOSHA>
- ❖ Workers in some sectors have a high risk of occupational exposure to COVID-19,

including:

- Healthcare and Laboratories –
- Emergency response –
- Mortuary services and other death care –
- Airline operations –
- Border protection and passenger screening –
- Critical retail operations (e.g., grocery stores, pharmacies)

❖ Workers who are in a medium exposure risk are:

- Jobs that require frequent (i.e., more than a few minutes) and/or close (i.e., within 6 feet) contact with people who may be infected with SARS-CoV-2, but who are **not** known or suspected COVID-19 patients.

Examples include:

- Critical retail workers, such as those in pharmacies and grocery stores.
- Transit workers, such as bus drivers, subway operators, and taxi drivers.
- Workers in other transportation operations.

❖ Workers who are in a low exposure risk are:

Jobs that do not require contact with people known to be or suspected of being infected with SARS-CoV-2, nor frequent close contact with (within 6 feet) of the general public. Workers in this category have minimal occupational contact with the public and other coworkers.

EXPOSURE DETERMINATION Town of Wallingford, VT

The first step the Town has taken is to conduct a hazard assessment to determine our risk level and exposure potential. The following was determined.

High Risk Employees or Job Descriptions

None

Medium Risk Employees or Job Descriptions.

Transfer Station Employees, the Town Clerk/Treasurer, the Assistant Town Clerk/Treasurer(s), Town Administrator (once no longer working from home), Assessor, Summer Recreation Co-directors, and Zoning Administrator.

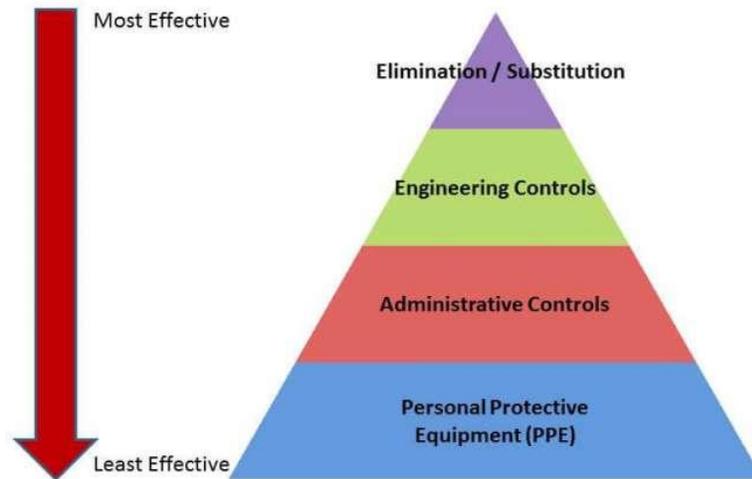
Low Risk Employees or Job Descriptions.

Highway Department.

Hazard Reduction

As with all hazards, it is the Town's goal to eliminate the hazard if possible. Using the Hierarchy of Controls and the VOSHA Mandatory Health and Safety Requirements for all Business it is our goal to minimize the hazard.

Hierarchy of Controls



A. Elimination

We have reviewed our tasks - the following practices have been evaluated:

1. Working Remotely - The State of Vermont Agency of Commerce and Community Development is requiring all business, non-profit and government operations work remotely whenever possible –
2. Meetings and trainings conducted via internet
3. Customer services done via internet
4. Other

The practices the Town eliminated and replaced with alternative methods are:

1. *Town Administrator, Assessor and other employees who can work remotely will work remotely.*
2. *All Committee/Commission meetings conducted via Zoom for public participation*

B. Engineering Controls

We have reviewed our tasks - the following suggested controls have been evaluated:

1. Physical barriers to prevent spread; – i.e. workstation barrier i.e. sneeze guards for cashiers
2. Isolation of tasks
3. Employee to employee contact reduced by spreading out workstations
4. Ventilation patterns and air change rates
5. Other

The Engineering Controls the Town has implemented are:

1. *Restricted use of the town garage and transfer station offices to one employee at a time and no public allowed.*
2. *Encouraged the increase of ventilation at all facilities with windows open and garage doors open whenever possible.*
3. *Provided or offered to provide cloth face masks to all employees.*
4. *Installed translucent barriers in the Town Clerk and Treasurer's Office and at the Town Administrator's desk to be used when not working remotely.*
5. *Restrict research appointments to Town Hall and denying public access to the area behind the Town Clerk/Treasurer office counter.*
6. *All municipal employees must adhere to 6-foot safe distancing practices.*
7. *Visitors must comply with 6-foot safe distancing rule.*
8. *Closed Elfin Lake for the 2020 season.*

C. Administrative Controls

It is believed that Administrative Controls / Work Practice Controls can be very effective in preventing the spread of COVID-19. We have reviewed our tasks and the following Administrative Controls have been evaluated:

1. Training
2. Behavior Modification - Social distancing of 6 feet apart. –
 - 2a. Personal Cleanliness: Hand washing.
 - 2b. Require employees to wipe down their area after use.
3. Work Surface Cleanliness
 - 3a. Wipe down surfaces such as door push bars, shopping carts, points of sale machines, chairs in waiting areas, and other areas that customers, visitors, or workers frequently touch.
4. Employee self-monitoring - stay home if feeling ill
5. Temperature testing
6. Reducing the number of people riding in a vehicle to 2
7. Staggered work shifts, break times to reduce employee and public contact
8. Limit staff travel between multiple sites.
9. Implement a safe process to receive supplies and deliveries.

The Administrative Controls the Town has implemented are:

1. *Restricted municipal vehicle use to no more than two employees at a time. Employees SHALL wear face masks while in a vehicle together.*
2. *Required safe distancing of 6 feet apart and frequent hand washing.*
3. *Provided VOSHA Training on COVID-19.*
4. *Required all employees to self-administer a Respiratory Illness Survey and Report before every shift, every day.*
5. *Require all surfaces to be wiped down before and after every shift. Tools and equipment must be wiped down before transferring to another employee. All research records at Town Hall must be wiped down between uses.*
6. *Employees are instructed to self-monitor for illness and stay home if ill.*
7. *Deliveries at Town Hall are limited to the Taft Terrace entrance with detailed instructions*

- for drivers posted on the door. No deliveries at the Town Garage or Transfer Station at this time. Highway Department special deliveries will be to the job site whenever possible.*
8. *Researchers visiting Town Hall must schedule a time to enter the building.*

D. Personal Protective Equipment

General Information: what is and what is not considered PPE

Things that are PPE;

Gloves: various gloves protect against varying hazards, most commonly, medical grade Nitrile or latex gloves are used to protect against pathogenic hazards

Body Protection; Most often varying forms of protective suits are worn to protect from pathogenic hazards. In the case of facilities with direct contact of known or suspected COVID-19 infectious subjects, Tyvek, full body suits can be worn. However! To be impervious to the maximum of the design, all seams should be sealed

Eye/face protection; Eye protection should also be worn for those involved in the direct contact of known or suspected COVID-19 infectious subjects. Eye protection should provide side protection at the least.

Face shield make excellent protection, especially when used in conjunction with eye protection.

Respirators - are tight fitting and considered personal protective equipment.

If N95 masks are used voluntarily, there is no need to have a fit test conducted (but need to provide mandatory Appendix D) If respirators are required in a workplace, a fit test must be complete, and the employer needs a full and detailed protection program (1910.134) Respirators must be used if involved in medical procedures when exposed to aerosolized virus (intubating, treatment of coughing, etc.) (See Appendix D of the respiratory standard at the conclusion of this document – Attachment 2.

Face Mask - Cloth – Often homemade, but not considered PPE, have been determined to be helpful in protecting others from coughing, sneezing or spraying droplets when talking.

<https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/diy-cloth-face-coverings.html>

Mandatory Requirements

The following are mandatory requirements:

Mandatory - Employees must wear cloth face coverings over their nose and mouth when in the presence of others.

We have accomplished this by the following practices;

- 1) *Required all employees to wear face masks when in the presence of others and provided, or offered to provide, cloth face masks to all municipal employees.*

Mandatory Requirement - All employees must observe strict social distancing of 6 feet while on the job, unless noted, and should refrain from touching their faces. •

No congregation of employees is allowed. All common areas excluding restrooms are closed.

We have accomplished this by:

- 1) *Restricting the town garage and transfer station offices to one employee at a time.*
- 2) *Work stations are at least 6 feet apart.*
- 3) *Prohibited use of break rooms and common areas.*
- 4) *Closed the Town Hall restroom to the public.*
- 5) *No more than 2 employees allowed behind the counter in the Town Clerk/Treasurer office.*
- 6) *Limit the Zoning/Assessor and Town Administrator offices to one employee and one visitor at a time. Fire District #1 Office limited to two employees and one visitor at a time.*
- 7) *Limit total occupation of Town Hall to 10 people (including employees and visitors) and restrict researchers to appointment only visits. All employees and visitors must observe 6-foot safe distancing.*

Mandatory Requirements - When working inside, open doors and windows to promote air flow to the greatest extent possible and limit the number of people occupying a single indoor space.

We have accomplished this by the following:

- 1) *Encourage Town Hall and town garage windows and doors to be open as often as weather permits. .*

Mandatory Requirements – Restrict access to vehicles when conducting work, and shall wear face coverings when riding together.

We have accomplished this by the following:

- 1) *No more than 2 people shall occupy a municipal vehicle when on duty. Both occupants SHALL wear face masks at all times.*

Mandatory Requirements - All common spaces and equipment, including bathrooms, frequently touched surfaces and doors, tools and equipment, and vehicles must be cleaned and disinfected at the beginning, middle and end of each shift and, when possible, prior to transfer from one person to another. <https://www.cdc.gov/coronavirus/2019-ncov/community/disinfecting-building-facility.html>

We have accomplished this by the following housekeeping procedures.

Supplies: Disinfectant sprays, wipes, and paper towels in the bathroom at the town garage, in the storage closet at Town Hall and under the counter in the Town Clerk/Treasurer's office, in the office at the transfer station, and in the concession stand at Elfin Lake.

Schedule: Employees shall wipe down surfaces at the beginning, middle and end of their shifts daily as well as between uses of a book, tool, research material, equipment, municipal vehicle, office product, copier or other shared items.

Mandatory Requirements - Employees must have easy and frequent access to soap and water or hand sanitizer during duration of work, and handwashing or hand sanitization is required frequently including before entering, and leaving, job sites.

We have accomplished this by the following practices:

- 1) Town Hall and the town garage have easy access to sinks, water and soap. Frequent hand washing is encouraged.*
- 2) A hand sanitizer station will be installed at Town Hall for visitors and employees.*
- 3) Hand sanitizer is supplied to the town garage and transfer station.*

Mandatory Requirements - Businesses shall ask Customers, and the public in general, to wear face coverings any time they are interacting with others from outside their household.

Update on New Work Safe Additions to the Stay Home, Stay Safe Order:
<https://accd.vermont.gov/news/update-new-worksafe-additions-stay-home-stay-safe-order>

We have accomplished this by the following practices:

- 1) Require all visitors inside Town Hall to wear face masks.*
- 2) Prohibit visitors inside the town garage and transfer station offices.*
- 3) Encourage visitors to the transfer station and the parking area of the town garage to wear face masks.*

Mandatory - Signs must be posted at all entrances clearly indicating that no one may enter if they have symptoms of respiratory illness.

We have accomplished this by the following practices:

- 1) Posted signs at Town Hall, the transfer station and town garage.*

To the extent feasible, prior to the commencement of each work shift, prescreening or survey, including temperature checks shall be required to verify each employee has no symptoms of COVID-19. Symptoms include;

- Cough
- Shortness of breath or difficulty breathing

Or at least two of these symptoms:

- Fever ($\geq 100.0^{\circ}\text{F}$ or subjective fever)

- Prior to the commencement of each work shift, pre-screening, including temperature checks and health survey shall be required to verify each employee has no symptoms of respiratory illness (fever, cough, and/or shortness of breath). At the present time non-contact thermometers are in short supply, however employers shall immediately order, and use their best efforts to obtain, thermometers in order to conduct routine temperature checks.

- Chills

- Repeated shaking with chills
- Muscle pain
- Headache
- Sore throat
- New loss of taste or smell

We have accomplished this by the following practices:

- 1) *Provided all employees with a Respiratory Illness Survey and Report and required it be self-administered before every shift every day.*
- 2) *Posted a sign on the bulletin board at the Town Garage and provided memos to transfer station and Town Hall employees regarding pre-screening for these symptoms.*

The person responsible for ensuring employees are self-administering is: the Road Foreman at the Town Garage, Jim Regula at the transfer station, and the town administrator at Town Hall.

Mandatory - Employees shall not report to, or be allowed to remain at, work or job site if sick or symptomatic (with fever, cough, and/or shortness of breath). • Non-symptomatic COVID-19 positive workers are not allowed on site and any worker(s) who have contact with a worker or any other person who is diagnosed with COVID-19 are required to quarantine for 14 days.

We have accomplished this by the following practices:

- 1) *Provided all employees with a Respiratory Illness Survey and Report and required it be self-administered before every shift every day.*
- 2) *Posted a sign on the bulletin boards at the Town Garage and provided memos to transfer station and Town Hall employees regarding pre-screening for these symptoms.*

The person responsible for ensuring employees are self-administering is: the Road Foreman at the Town Garage, Jim Regula at the transfer station, and the town administrator at Town Hall and Elfin Lake concessions.

Employee Training

All employees, including those already working (except healthcare workers, first responders, and others already trained in infection control, personal protective/universal precautions) must complete training by May 4, 2020.

VOSHA has provided a Power Point to assist with this endeavor. <https://labor.vermont.gov/document/protecting-safety-and-health-workers-vosha>

We have been given the option of using a different program that meets or exceeds VOSHA's.

We have chosen to use the following training: VOSHA's training via hard copy supplied to employees with Certificates signed and dated upon completion.

The Town Administrator will either train, or arrange for training, in the required elements of the VOSHA COVID-19 requirements. Training will be provided at no cost to the employee and

during working hours.

Describe what training you have provided: See VOSHA Training Manual attached.

Training Documentation:

Documentation must include the name of the employee, date of training, summary of training and the name of the trainer/s. We maintain our training records for at least (3) years or for the duration of the employment, whichever is longer.

- a. Training records required by the VOSHA standard are made available to employees, employee representatives, or to VOSHA representatives for examination and copying.

Recording Workplace to COVID-19 Illnesses in the Workplace

- a. OSHA recordkeeping requirements (29 CFR Part 1904) mandate covered employer record certain injuries and illnesses on the OSHA 300 log.
- b. COVID-19 can be a recordable illness if a worker is infected as a result of performing their work-related duties. However, employers are only responsible for recording cases of COVID-19 if all of the following are true:
 - 1. The case is a confirmed case of COVID-19 (see CDC information on persons under investigation and presumptive positive and laboratory-confirmed cases of COVID-19):
 - 2. The Case is work-related (as defined by 29 CFR 1904.5) and
 - 3. The case involves one or more of the general recording criteria set forth in 29 CFR 1904.7 (e.g. medical treatment beyond first aid, days away from work).

Additional information can be found at OSHA’s Enforcement Guidance for Recording Case of COVID-19.

Medical Records

- a. Medical records shall be maintained for at least the duration of employment plus 30 years.
- b. If the Town of Wallingford ceases to do business and there is no successor employer to receive and retain the records for the prescribed period, the employer shall notify the Director of NIOSH, US Department of Health and Human Services, at least three months prior to their disposal and transmit them to the Director, if required by the Director to do so, within that three month period.

Issue Date: June 1, 2020

Reissue
Date:

Signature
of Board of
Health
Officers:

Signature
of
Selectboard
Chair

TRAINING PROGRAM Attachment 1

Our Training Program includes the following elements (at a minimum)

An explanation of the modes of transmission of COVID-19

A general explanation of the symptoms of COVID -19

An explanation of the modes of transmission of COVID -19

An explanation of the Town of Wallingford exposure Control Plan and the means by which employees can get a copy of the plan

Instruction on how to properly put on and take off gloves, N95's and cloth masks

An explanation on the basis for the selection of PPE

Information of how to contact someone if the employee has a temperature or does not feel well

What to do if the employee traveled to high risk areas or have been exposed to possible COVID-19 cases

Hand washing techniques

Cleaning schedules

Pre-screening before work

Attachment 2

Appendix D of Respirator Standard CFR 1910.134

Appendix D to Sec. 1910.134 (Mandatory) Information for Employees Using Respirators When Not Required Under the Standard

Respirators are an effective method of protection against designated hazards when properly selected and worn. Respirator use is encouraged, even when exposures are below the exposure limit, to provide an additional level of comfort and protection for workers. However, if a respirator is used improperly or not kept clean, the respirator itself can become a hazard to the worker. Sometimes, workers may wear respirators to avoid exposures to hazards, even if the amount of hazardous substance does not exceed the limits set by OSHA standards. If your employer provides respirators for your voluntary use, or if you provide your own respirator, you need to take certain precautions to be sure that the respirator itself does not present a hazard.

You should do the following:

1. Read and heed all instructions provided by the manufacturer on use, maintenance, cleaning and care, and warnings regarding the respirators limitations.
2. Choose respirators certified for use to protect against the contaminant of concern. NIOSH, the National Institute for Occupational Safety and Health of the U.S. Department of Health and Human Services, certifies respirators. A label or statement of certification should appear on the respirator or respirator packaging. It will tell you what the respirator is designed for and how much it will protect you.
3. Do not wear your respirator into atmospheres containing contaminants for which your respirator is not designed to protect against. For example, a respirator designed to filter dust particles will not protect you against gases, vapors, or very small solid particles of fumes or smoke.
4. Keep track of your respirator so that you do not mistakenly use someone else's respirator.

References: Note – requirements are continually changing. This document was prepared 5/1/2020. Changes will occur that are not reflected in this document.

<https://accd.vermont.gov/news/update-new-work-safe-additions-stay-home-stay-safe-order>
<https://labor.vermont.gov/VOSHA>
<https://labor.vermont.gov/document/protecting-safety-and-health-workers-vosha>
<https://www.cdc.gov/coronavirus/2019-ncov/community/disinfecting-building-facility.html>