

BWC Division of Safety & Hygiene Responsible RestartOhio FAQs and Resources

Frequently Asked Questions

Do I need to do anything before re-starting machinery (e.g., electrical, hydraulic, pneumatic, or mechanical energy issues) during the Responsible Restart of my business operations?

There are two main steps before restarting any machinery that has been idle for a while:

1. Control of hazardous energy – Follow the normal maintenance, inspection and testing procedures for each piece of equipment including any procedures for re-energizing equipment according to your workplace “lockout/tagout” policy and the equipment manufacturer instructions.
2. Disinfection of controls and high-contact surfaces – As you prepare to restart machinery and equipment, be sure to clean and disinfect the controls and high-contact surfaces.

What disinfectants can I use to clean surfaces that are effective against SARS-CoV-2, the virus that causes COVID-19?

The Ohio Department of Health (ODH) recommends use of a disinfectant listed by the United States Environmental Protection Agency (EPA) as effective against the SARS-CoV-2 virus (COVID-19). This list, known as List N, is available at <https://www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2>.

When using an EPA-registered disinfectant, follow the label directions for safe, effective use including any requirements for contact time and personal protective equipment (PPE). Follow the EPA [Six Steps for Safe & Effective Disinfectant Use](#).

If you cannot find a product on EPA List N, look at a different product’s label to confirm it is an [EPA registered disinfectant](#) effective against the human coronavirus.

How do I disinfect my workplace?

According to the CDC, if your workplace, school, or business has been unoccupied for 7 days or more, it will only need your normal routine cleaning to reopen the area. This is because the virus that causes COVID-19 does not appear to survive on surfaces longer than this time.

If your workplace requires surface disinfection, use an [EPA registered disinfectant](#) that is effective against SARS-CoV-2 (COVID-19) and follow the United States Centers for Disease Control and Prevention (CDC) guidance for [Reopening Guidance for Cleaning and Disinfecting Public Spaces, Workplaces, Businesses, Schools, and Homes](#).

The CDC recommends that if machinery or equipment are thought to be contaminated and cannot be cleaned, they can be isolated. Isolate papers or any soft (porous) surfaces for a minimum of 24 hours before handling.

After 24 hours, remove soft materials from the area and clean the hard (non-porous) surfaces per the cleaning and disinfection recommendations. Isolate hard (non-porous) surfaces that cannot be cleaned and disinfected for a minimum of 7 days before handling.

How often do I need to disinfect work surfaces?

If you have a confirmed case of COVID-19 identified at your workplace, the ODH Responsible Protocols require employers to perform a complete shut-down of the shop/floor for deep sanitation.

Each day employers must follow the Ohio Department of Health (ODH) Sector Specific Operating Requirements, which include:

- [Manufacturing, Distribution & Construction](#) employers must:
 - Conduct a daily deep disinfection of high-contact surfaces
 - To minimize risk of exposure ODH recommends the best practice of conducting a daily deep disinfection of the entire facility
- [Consumer, Retail, & Service](#) operations must:
 - Disinfect high-contact surfaces hourly
 - Clean merchandise before stocking whenever possible
- [General Office Environments](#) must:
 - Frequently disinfect desks, workstations, and high-contact surfaces
 - Disinfect common areas

If I shut down my facility as a result of a COVID-19 case or outbreak, what is the recommended way to clean and disinfect, and what is the appropriate timeframe to resume operations?

The CDC has issued guidance for cleaning and disinfection in specific [workplace sectors](#). The guidance includes:

- Wait 24 hours before cleaning and disinfecting to minimize potential for exposure to respiratory droplets. If 24 hours is not feasible, wait as long as possible.
- Open outside doors and windows to increase air circulation in the area.

Cleaning staff should clean and disinfect all areas including offices, bathrooms, and common areas, focusing especially on frequently touched surfaces.

- Clean dirty surfaces with soap and water prior to disinfection.
- Next, disinfect surfaces using products that meet EPA's criteria for use against SARS-Cov-2, the virus that causes COVID-19, and that are appropriate for the surface.
- Follow the manufacturer's instructions for all cleaning and disinfection products for concentration, application method, contact time, and required PPE.

Operations can resume as soon as the cleaning and disinfection are completed.

I have eyewash stations in my workplace, is there anything I need to do to make sure they provide an adequate flow of safe water?

Yes. It is important to properly maintain eyewash equipment and regularly flush water lines or drains and replace eyewash fluid to prevent sediment buildup and growth of bacteria and microorganisms in the water supply.

During the Responsible Restart of your business operations, follow the manufacturer instructions for flushing or draining/refilling this important safety equipment to ensure it meets the requirements of [ANSI/ISEA Z358.1 – 2014, American National Standard for Emergency Eyewash and Shower Equipment](#).

What is the difference between a surgical mask and an N-95 respirator?

The CDC has an infographic that explains the differences between face coverings, face masks, and respirators: <https://www.cdc.gov/niosh/nppt/pdfs/UnderstandDifferenceInfographic-508.pdf>

Surgical masks and N-95 respirators are critical items primarily reserved at this time for healthcare workers.

How are face coverings different from surgical masks and N-95 respirators?

Facial coverings or masks can assist in a safer return to work for the community and reduce chances of transmission of the virus. The intent of facial coverings is not to protect the wearer, but to serve as a source control to reduce the spread of potentially infectious particles in people before they become symptomatic.

Facial coverings supplement procedures like increased hand washing, social distancing, and increased monitoring of workers' health. Facial coverings will allow business to return to a functioning state with minimized risk of disease spread.

More information about face coverings can be found at <https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/diy-cloth-face-coverings.html>

N-95 respirators offer a higher level of protection and are in short supply. Therefore, these should be reserved for health care workers treating patients.

The CDC cautions that face coverings are not respirators and are not appropriate substitutes for them in workplaces where masks or respirators are recommended or required.

Should I require my employees to wear facial coverings in my workplace?

The ODH Responsible RestartOhio Protocols require employees to wear facial coverings.

All employees must wear a facial covering, unless they meet one of the following exceptions:

- Facial coverings in the work setting are prohibited by law or regulation
- Facial coverings are in violation of documented industry standards
- Facial coverings are not advisable for health reasons
- Facial coverings are in violation of the business's documented safety policies
- Facial coverings are not required when the employee works alone in an assigned work area
- There is a functional (practical) reason for an employee not to wear a facial covering in the workplace.

[ODH has a handout](#) that explains the use of cloth facial coverings.

Do I have to pay for required face coverings?

There is currently no requirement for employers to pay for required facial coverings. Since facial coverings do not protect the wearer from the virus, they do not meet the criteria for required Personal Protective Equipment (PPE) under OSHA or PERRP regulations. Therefore, under these regulations employers are not obligated to provide or pay for this equipment or establish a respiratory protection program. However, the CDC encourages employers to monitor employee facial coverings to make sure they are replaced as necessary.

Do my employees need to wear any specific personal protective equipment (PPE) when we restart our business?

Most business do not require specialized PPE beyond the equipment already required for the safe performance of normal job duties.

If you have employees that will disinfect your workplace, follow the label directions for any PPE required for safe application. This may include gloves, goggles, a faceshield, or protective outer wear.

However, ODH protocols may require the use of facial coverings or other items primarily to prevent the spread of the virus. Although sometimes referred to as PPE, technically they are not.

CDC does not recommend the use of PPE in workplaces where it is not routinely recommended. Facilities can use the [hierarchy of controls](#), such as engineering and administrative controls – these strategies are even more effective at preventing exposures than wearing PPE.

How do employees prevent fogging of safety glasses and glasses with corrective lenses when they wear a face covering, face mask, or N95 respirator?

Manufacturers of safety glasses and corrective lenses make lenses with coatings that minimize fogging. There are also sprays and pastes that help reduce lens fogging.

Frequently, employees can minimize lens fogging by shaping their face mask around the bridge of their nose to prevent exhaled air from traveling upward into or onto their glasses. If employees make their own cloth face covering, they can improve the "seal" around the upper part of their nose by attaching a pipe cleaner, a small rolled up piece of aluminum foil, or similar material that will hold its shape to the top, underside, or in the upper fold of the face covering.

Do my employees need to wear gloves in my workplace?

Unless you previously required gloves for specific work tasks (e.g., food preparation, handling chemicals, performing health care procedures, etc.) your employees do not need to wear gloves for protection from COVID-19, according to the CDC. However, you must provide access to handwashing and hand sanitizing stations in your workplace.

If you choose to provide gloves for specific work tasks, follow the glove manufacturer instructions and any instructions on the Safety Data Sheet (SDS) for the product being handled when you select the glove type and material.

What OSHA or PERRP standards should I be paying extra attention to during COVID-19?

OSHA created a standards reference page that highlights standards that may apply to worker exposure to the novel coronavirus, SARS-CoV-2, that causes Coronavirus Disease 2019 (COVID-19). You can review the information here: <https://www.osha.gov/SLTC/covid-19/standards.html>

Do I need to develop and implement a workplace exposure control plan (ECP) for COVID-19 like an ECP for bloodborne pathogens?

There are no regulatory requirements in Ohio for developing and implementing an ECP for airborne transmitted diseases like COVID-19. The Bloodborne Pathogens standard (29 CFR 1910.1030) only applies to occupational exposure to human blood and other potentially infectious materials (OPIM). This standard doesn't typically apply to respiratory secretions that may contain SARS-CoV-2 (unless visible blood is present). However, the provisions of the standard offer a framework that may help control some sources of the virus, including exposures to body fluids (e.g., respiratory secretions) not covered by the standard.

If I have a confirmed case of COVID-19 in my workplace, do I have to record it on my OSHA 300 or PERRP 300P Log of Work-Related Injuries and Illnesses?

Maybe. Given the nature of the disease and its widespread community spread, it remains difficult to determine whether a COVID-19 illness is work-related, especially when an employee has experienced potential exposure both in and out of the workplace.

Because of the difficulty with determining work-relatedness, OSHA and PERRP are exercising enforcement discretion to assess employers' efforts in making work-related determinations.

OSHA and PERRP will apply the following considerations to determine work-relatedness for COVID-19 cases:

1. The reasonableness of your investigation into work-relatedness.
2. The evidence reasonably available to you as an employer.
3. The evidence that the COVID-19 illness was contracted at work.

For example:

- An employee case IS LIKELY work-related if several cases of workers with confirmed cases who work together and there is no other reasonable explanation;

- An employee case IS LIKELY work-related if contracted following lengthy close exposure in the workplace to the general public or a co-worker with a confirmed case and there is no other reasonable explanation;
- An employee case IS LIKELY work-related if their job duties require close exposure to the general public in an area with ongoing community transmission and there is no other reasonable explanation;
- An employee case IS NOT LIKELY work-related if they are the only worker to contract COVID-19 in the facility and the worker does not interact with the general public;
- An employee case IS NOT LIKELY work-related if outside the workplace, closely and frequently associates with someone (e.g., a family member, significant other, or close friend) who (1) has COVID-19; (2) is not a coworker, and (3) exposes the employee during the period in which the individual is likely infectious.

OSHA and PERRP will consider evidence of causation about an employee illness provided by medical providers, public health authorities, or the employee. If you cannot determine whether it is more likely than not that a workplace exposure was one of the causes for a particular case of COVID-19 then you are not required to record the illness on your Log.

During the recent Ohio stay-at-home order, I was unable to comply with OSHA or PERRP required audit, assessment, inspection, testing, or training requirements. What do I need to do to make sure my workplace continues to meet those requirements?

Current [OSHA enforcement policy](#) states, in part, that “in instances where an employer is unable to comply with OSHA-mandated training, audit, assessment, inspection, or testing requirements because local authorities required the workplace to close, the employer should demonstrate a good faith attempt to meet the applicable requirements as soon as possible following the re-opening of the workplace.”

“Where the employer cannot demonstrate any efforts to comply, a citation may be issued as appropriate under existing enforcement policy. However, where an employer has made attempts to comply in good faith, Area Offices shall take such efforts into strong consideration in determining whether to cite a violation. Where enforcement discretion is warranted, Area Offices will ensure that sufficient documentation (e.g., notes on the efforts the employer made to comply, letters or other documentation showing that providers had closed) is provided in the case file to support the decision.”

PERRP will follow the OSHA enforcement policy for Ohio public sector workplaces.

Do I need to clean or sanitize my Heating, Ventilating, or Air Conditioning (HVAC) units during the Responsible Restart of my business operations? What ongoing maintenance do I need to perform on my HVAC system to minimize the risk of spreading the COVID-19 virus in my workplace?

The [American Society of Heating, Refrigerating and Air-Conditioning Engineers \(ASHRAE\)](#) developed a series of [Frequently Asked Questions](#) and [Occupancy Guides](#) to ensure your HVAC system operates safely, effectively, and efficiently.

The guidelines and FAQs contain specific information about how to return an HVAC system to normal operation following an extended shut-down. Look in the “buildings” tab on the [ASHRAE COVID-19 Preparedness Resources page](#) for guidance on your type of facility. There are guidelines for buildings in the following sectors: [Healthcare](#), [Residential](#), [Commercial](#), as well as [Schools and Universities](#).

COVID-19 Resources

The following resources are provided to help employers find answers to their workplace specific questions.

[Ohio Department of Health \(ODH\) Resources](#)

- Ohio Department of Health (ODH) Coronavirus resource page: <https://coronavirus.ohio.gov/wps/portal/gov/covid-19/home>
- ODH — Responsible RestartOhio <https://coronavirus.ohio.gov/wps/portal/gov/covid-19/responsible-restart-ohio/welcome/responsible-restart-ohio>
- ODH — Responsible Protocols <https://coronavirus.ohio.gov/wps/portal/gov/covid-19/responsible-restart-ohio/responsible-protocols/responsible-protocols>
- ODH — Responsible Protocol for [Manufacturing, Distribution & Construction](#) workplaces: <https://coronavirus.ohio.gov/static/responsible/Manufacturing-Distribution-Construction.pdf>
- ODH — Responsible Protocol for [Consumer, Retail, & Service](#) workplaces: <https://coronavirus.ohio.gov/static/responsible/Consumer-Retail-Services.pdf>
- ODH — Responsible Protocol for [General Office Environments](#) workplaces: <https://coronavirus.ohio.gov/static/responsible/General-Office-Environments.pdf>

[United States Centers for Disease Control and Prevention \(CDC\) Resources](#)

- CDC — Coronavirus resource page: <https://www.cdc.gov/coronavirus/2019-nCoV/index.html>
- CDC — [General Business Frequently Asked Questions](#)
- CDC — [Information for Healthcare Professionals about Coronavirus \(COVID-19\)](#)
- CDC — [Reopening Guidance for Cleaning and Disinfecting Public Spaces, Workplaces, Businesses, Schools, and Homes](#): <https://www.cdc.gov/coronavirus/2019-ncov/community/reopen-guidance.html>
- CDC — [Cleaning & Disinfecting Decision Tool](#): https://www.cdc.gov/coronavirus/2019-ncov/community/pdf/ReOpening_America_Cleaning_Disinfection_Decision_Tool.pdf

[Occupational Safety and Health Administration \(OSHA\) Resources](#)

- OSHA Coronavirus resource page: <https://www.osha.gov/SLTC/covid-19/>
- OSHA poster: [Ten Steps All Workplaces Can Take to Reduce Risk of Exposure to Coronavirus Poster](#). (April 6, 2020).
- OSHA Alerts:
 - [COVID-19 Guidance for Restaurants & Beverage Vendors Offering Takeout or Curbside Pickup \(Spanish\)](#)
 - [COVID-19 Guidance for the Construction Workforce \(Spanish\)](#)
 - [COVID-19 Guidance for the Manufacturing Industry Workforce \(Spanish\)](#)
 - [COVID-19 Guidance for the Package Delivery Workforce \(Spanish\)](#)
 - [COVID-19 Guidance for Retail Workers \(Spanish\)](#)
 - [Prevent Worker Exposure to Coronavirus \(COVID-19\) \(Spanish\)](#)

[National Institute for Occupational Safety and Health \(NIOSH\) Resources](#)

- NIOSH Coronavirus resource page: https://www.cdc.gov/niosh/emres/2019_ncov.html
- CDC and OSHA [guidance for meat and poultry processing workers and employers](#)
- CDC NIOSH [Industry Specific Factsheets](#)

[United States Environmental Protection Agency \(EPA\) Resources](#)

- EPA CDC — [Guidance for Cleaning and Disinfecting Public Spaces, Workplaces, Businesses, Schools and Homes](#)
- EPA — List (List N) of approved disinfectants against SARS-CoV-2 (COVID-19) <https://www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2>
- EPA — Label Guidance for Specific Types of Pesticides: <https://www.epa.gov/pesticide-labels/label-guidance-specific-types-pesticides>

[American Society of Heating, Refrigerating and Air-Conditioning Engineers \(ASHRAE\) Resources](#)

ASHRAE — Coronavirus (COVID-19) Response Resources page: www.ashrae.org/covid19

ASHRAE — Frequently Asked Questions and Glossary of Terms: <https://www.ashrae.org/technical-resources/frequently-asked-questions-faq>

[Johns Hopkins Bloomberg School of Public Health, Center for Health Security Resources](#)

[Operational Toolkit for Businesses Considering Reopening or Expanding Operations in COVID-19](#)