

## **Snowplow Safety and COVID-19**

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Managing the logistics of a snow and ice response plan is difficult enough without the threat of a COVID-19 outbreak affecting your workplace. As we all continue to focus on maintaining safe work conditions and healthy employees this winter, here are several tips to consider for the winter snow and ice season.

### **1. Define Snow and Ice Control Essential Functions and Protect Critical Infrastructure Workers –**

Government workers performing work necessary to continue essential operations were identified as exempt from portions of the Governor's stay at home executive orders. Although government agencies are still identified as critical infrastructure, employers are obligated to comply with mandates issued by the CDC, IDPH, and ILOSHA intended to protect workers who remain on the job during pandemic conditions. Each government body has previously determined its Essential Governmental Functions and identified those employees and/or contractors necessary to physically report to the job. Part of the identification process should include which jobs can be done remotely and the minimum number of staff needed to be on site for necessary functions including contingency circumstances such as winter weather response. Employers must ensure that performance of such functions still assures that health and safety measures are a priority in order to reduce the spread of COVID-19 to the greatest extent possible. All efforts should be made to comply with current social distancing, symptom identification, quarantine, and return to work guidance issued by the CDC, IDPH, and local health authorities. Work closely with local health departments to understand the best approach for outbreak control in the area. While there has been temporary enforcement guidance issued by OSHA, it is important to understand that this temporary guidance is not an opportunity to discontinue safety processes. Conversely, employers are expected to demonstrate that reasonable efforts were made to comply in full or partially to the largest extent possible.

#### **See:**

[IL Executive Order - Essential Governmental Functions Definition](#)

[CISA - Ensuring Essential Critical Infrastructure Workers Have the Ability to Work Safely](#)

[OSHA - COVID-19 Control and Prevention](#)

[OSHA - Citation Issued for Failure To Protect Workers](#)

[OSHA - Understanding Compliance with OSHA's Respiratory Protection Standard](#)

- ### **2. Stay Vigilant for New and Unexpected Issues –**
- Closely monitor updates and guidance for how pandemic related issues are affecting both employees and employers. Not only is this an important defense in workers compensation claims, but also for potential general liability claims. The pandemic and all the concerns surrounding it are not going away, therefore, we must not only prepare for the health of our employees and communities, but for the potential costs as some experts are projecting an increase in liability claims. In order to assure we have adequate defenses in place for any claims that may arise during the pandemic, IRMA advises members to be steadfast in their adherence to all applicable guidelines and to establish written procedures for all workers to adhere to. The failure to do so can increase exposure to all IRMA members. Consider now the conditions and scenarios that

may delay snow and ice operations such as observed or reported signs of illness or partial and complete shutdowns due to an outbreak. Also consider staffing issues related to current self-isolation protocols, delayed symptom reporting to deter being sent home, and impacts it may have on the public. Start with drafting a written COVID-19 response policy and include explicit plans to be executed in such events.

**See:**

[Preparing for the Flood of COVID-19 Liability Claims](#)

- 3. Identify and Isolate Suspected COVID-19 Cases.** – All individuals suspected or confirmed to have COVID-19 should be isolated from other workers and returned to work only in accordance with current CDC and IDPH guidance. Efforts should be made to limit the spread of infection by screening employees for symptoms prior to shift start, requiring the use of face coverings in common areas, and separating workers so they can remain socially distant during the workday. Extended measures could also be used such as wearing face coverings while in vehicles and staggering shift start times. Eliminate or at least greatly reduce the need for any worker coming in to perform essential functions while still under quarantine. The CDC has issued guidance for emergency responders that establishes level of exposure risk and how to safely bring back quarantined workers as needed. Returning workers sooner than guidance recommends is an exposure risk to employers and should only be considered as a last resort when all other measures to maintain adequate staffing have been exhausted. To eliminate the need for this risk, consider increasing the number of available workers to perform essential snow and ice response functions, prioritize and categorize routes based on necessity to be cleared, and schedule staff in a way that limits interaction amongst workers so infection does not spread across shifts. Also consider correspondence with the public on current road conditions and how route clearing times and staff availability due to COVID-19 may alter normal operations.
- 4. Secure external help** – Hire contract services or draft intergovernmental mutual-aid agreements with neighboring communities to offset staff shortages if an outbreak shuts down internal snow operations. Invest in contracted snow removal or other services to stagger employees being called out so they can maintain maximum social distance during breaks, eating, or sleeping. Train additional non-PW staff to use smaller snow removal equipment and have them available if primary snow staff are not available. Work with union representatives to ensure staffing strategies do not violate collective bargaining agreements.
- 5. Review the pandemic policy with employees** – Remind employees of the importance of monitoring and reporting symptoms even when snow response is happening. Have employees document their health screenings daily and to report any symptoms that arise during a shift. Indicate in policy that intentional delays in reporting or hiding illness symptoms to avoid being sent home is a terminable offense. Review with staff COVID-19 symptoms to watch for, how to report, and the current return to work protocols.

**See:**

[IRMA COVID-19 Sample Policy](#)

[IRMA - How to Safely Perform Health Screenings](#)

[IDPH - Health Screening Form Sample](#)

6. **Limit multiple users in one piece of equipment** – Social distance and limit sharing equipment amongst multiple operators to limit cross contamination. If the fleet is small and limited available equipment means that drivers will be rotating in and out of the seat, require use of face coverings in those vehicles and provide cleaning supplies and a cleaning checklist for drivers to sanitize before another driver gets in. Shared spaces such as break rooms, bathrooms, and kitchens should be thoroughly wiped down with disinfectant between users and capacity should be limited. Consider closing areas used for resting and sleeping during a snow event.

**See:**

[Hand Sanitizer Products](#)

[Aerapy - UV Disinfection Technology](#)

7. **Make Time for Cleaning** – Add to the regular routine more cleaning, sanitizing, and hand washing opportunities. Create a checklist for drivers to wipe down steering wheels, door handles, consoles, and radios before they turn in their vehicle. This will also help reduce the spread of other infectious diseases that could send someone home like the cold or flu. Encourage more hygiene practices by posting signs as reminder to clean and wash.
8. **Consider Ventilation Strategies** – The CDC has recommended increasing ventilation in facilities to reduce the spread of COVID-19 as well as decreasing the occupancy load within facilities causing a greater need for air exchange. Colder weather will make it difficult to keep windows and doors open to circulate in fresh air. Consult with HVAC experts to see if air exchange rates within the offices and common areas will be adequate for the winter season.

**See:**

[ASHRAE - Coronavirus \(COVID-19\) Response Resources from ASHRAE and Others](#)

[EPA - Ventilation and Coronavirus \(COVID-19\)](#)