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Returning to Work:
Small Manufacturing, Repair and Maintenance Shops

Guidance Document

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Overview

With stay at home and shelter-in-place restrictions beginning to lift, small manufacturing sites, repair and maintenance shops, etc. are faced with difficult questions that must be addressed as they transition back to normal operations, such as:

- How can we protect our employees, third parties, and customers from the disease?
- How can we minimize the risk of disease transmission if those that are ill or those who have had contact with positive COVID-19 in our workforce?
- What steps are needed if an employee had COVID-19 symptoms or a confirmed test for COVID-19?

Common examples of small manufacturing sites and maintenance shops include:

- Plants that directly manufacture, package, and transport material and goods for market
- Plants that manufacture parts, materials, and goods as parts that are sent to other manufacturers
- Welding shops, mechanical shops, small repair shops, etc.

What should an Employer do to protect themselves and their workers?

SARS-CoV-2, the virus that causes COVID-19, is thought to be spread primarily through respiratory droplets at close range. Airborne transmission from exposure to very small droplets over long distances is unlikely. However, there is evidence that this mode of transmission is possible, particularly in crowded, indoor spaces. People may also become infected by touching contaminated surfaces. The virus has been shown to survive in aerosols for hours and on surfaces for days. Infection can occur through eyes, nose, and mouth exposures. There is also strong evidence that people can spread the virus while pre-symptomatic or asymptomatic.

Small manufacturing sites, maintenance and repair shops, etc. should continually monitor global World Health Organization [WHO]), federal (Centers for Disease Control [CDC] and Occupational Safety and Health Administration [OSHA]), state, and local guidelines for changes in recommendations, disinfection strategies, worker protections and other best management practices.

Employers should consider the following strategies for reducing the risk of COVID-19 transmission in regards to physical distancing, ventilation, enhanced cleaning and disinfecting practices, restrooms, gathering areas and contact surfaces, personal hygiene, employee wellness, personal protective equipment (COVID-19 related protective equipment should include face coverings/masks and/or face shields for close contact activities, regular work gloves), training, waste and laundering, and communication. Employers should consider forming a knowledgeable team to monitor, assess, and implement new strategies as they become available.

Tips to Consider to Return to Normal Business Operations:

- Implement and inform employees of supportive workplace policies as applicable:
  – Flexible sick leave policies consistent with public health guidance. Providing paid sick leave is an important way to encourage employees to stay home when sick.
  – Consider not requiring a COVID-19 test result or a healthcare provider's note for employees who are sick to validate their illness in order to qualify for sick leave. If you do require a doctor's note from your employees to verify that they are healthy and able to return to work, be aware that healthcare provider offices and medical facilities

may be extremely busy and not able to provide such documentation in a timely manner. Get more information related to the Americans with Disabilities Act during the COVID-19 pandemic.

- Flexibility to stay home to care for a sick family member.

- Human resources policies consistent with public health guidance, and state and federal workplace laws. For more information on employer responsibilities, visit the Department of Labor's and the Equal Employment Opportunity Commission's websites.

- Employee assistance program and community resources to help employees manage stress and receive support.

- Encourage employees at increased risk for severe illness to request special accommodations to allow them to perform their job duties safely while also protecting sensitive employee health information.

- Post signs and reminders at entrances and in strategic places providing instruction on hand hygiene, respiratory hygiene, and cough etiquette. This should include signs with images for non-English readers, as needed.

- Encourage those who are sick or at greater risk to stay home. This includes:
  - People with underlying medical conditions.
  - People who live with elderly people or those who are at risk.
  - People with upper respiratory or flu-like symptoms or who live with someone with these clinical symptoms.
  - People with COVID-19, people who live with someone with COVID-19, or who have been exposed to someone with COVID-19.

- Employers should educate employees to recognize the symptoms of COVID-19 and provide instructions on what to do if they develop symptoms. At a minimum, any worker should immediately notify their supervisor, their health care provider, and the local health department, who will provide guidance on what actions need to be taken.

- Ask employees to consider the following if they commute to work using public transportation:
  - Use other forms of transportation if possible.
  - If taking public transportation, maintain physical distancing and wear a cloth or disposable face covering.
  - Change commute time to less busy times if possible.
  - Wash hands before and as soon as possible after their trip.

Best Management Practices Protocols

- If possible, stagger shifts to isolate and compartmentalize employees. This will allow protection of others if a breakout occurs and reduces/limits the number of people who are exposed at shift change. Having the same teams work together can limit the reach of a potential outbreak.

- Consider a 4-day work week, or other variation where possible, to allow for 72 hours of downtime at the facility.
  - This allows for limited exposure to 4 days instead of 5 days and;
  - The CDC and other recent studies have shown COVID-19 can stay active up to 3 days on surfaces.

- Complete a task-based review/mapping of the business work areas to determine best strategies for physical distancing of at least 6 feet, and ensure employees have cloth or disposable face coverings as necessary.

- Identify all high touch surfaces and ensure they are cleaned and disinfected on a daily basis and between shifts.

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- For two person jobs, determine what additional PPE may be required besides cloth or disposable face coverings.

- Where individual workstations prevent 6-foot separation, utilize plastic partitions between employees.

- Reduce the number of individuals on the site to essential employees to complete the work. Temporary spaces (site/job trailers) should be cleaned and disinfected daily.

- Inform all customers, sales personnel and visitors to wear cloth or disposable face coverings and to abide by physical distancing requirements when on site.

- No handshake greetings.

- Eliminate non-essential visits, such as job tours, vendor demos, etc. Essential visits should be done in a dedicated, isolated space if available.

- Do not share clipboards, but rather use a white board to demonstrate the concept in the field.

- If you are symptomatic – do not visit the site and stay home.

- Establish an isolated area for all delivery companies to drop off materials and supplies. Require delivery and shipping personnel to wear cloth or disposable face coverings and gloves when arriving at the site.

- Consider wiping down/disinfecting all items to be shipped prior to pick up.

- Reduce tasks requiring a large number of people to be in one area.

- Weekly safety/toolbox talks should be virtual or in smaller groups. All hands meetings shall be reduced in frequency. Consider limiting meetings to 10 people or less, depending on the size of the room where the meeting will be conducted. Employees should consider using virtual meeting tools, including phone, TEAMS, VTC or WebEx, in lieu of in-person meetings, whenever possible.

- Employee teams or identified groups shall clean and disinfect their shared workstations and equipment after each use or shift.

- Do not share tools if possible. When tools are shared, ensure they are cleaned and disinfected before and after each use.

- All large shared equipment and tools shall be cleaned before and after use.

- Ensure toolbox talks have adequate spacing and only have one person note who is in attendance.

- Encourage employees to raise other measures that can be put into place to further reduce the potential spread of the virus.

- Modify break areas to allow for physical distancing. Stagger breaks to reduce people in break areas.

- Dining tables should be marked with "X"s to discourage people from sitting closer than 6 feet away from each other.

- Breakrooms should have chairs removed to minimize any chance of gathering.

- Janitorial employees should be disinfecting eating areas hourly or as frequently as possible.

- Reduce the number of people in company-owned vehicles or organized van pools.

- Encourage employees to wash clothes and face coverings daily on the warmest setting possible.

- If a positive COVID-19 case amongst the workforce is identified, quickly disinfect the employee's workspace.

- Maintain a daily approved visitor log. This log should include the date, time, and contact information of the visitor.

- Stop employees from walking floors, between floors, or buildings unnecessarily to reduce cross-contamination.

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- Consider wearable technology such as proximity devices worn on hard hats or wrist bands to monitor employee physical distancing and tracing of contacts.
- For close contact activities that cannot be adjusted for physical distancing, consider providing enhanced PPE or a face shield with a face covering while fully considering all the potential OSHA requirements.

- Health checks and reporting requirements of individuals infected with COVID-19 should be explained to employees prior to reopening and again once operations have resumed.

- Communicate to employees the importance of being vigilant when monitoring symptoms and staying in touch with their employer or manager if or when they start to feel sick.

- Provide for additional hand washing stations with soap and water in common areas and throughout the site.

- Make hand sanitizer stations available throughout work and public places. Stations should also be placed in convenient locations, such as at entrances, exits, near elevators, and restrooms. Touch-free hand sanitizer dispensers should be installed where possible.
  - Also provide hand sanitizer in vehicles such as forklifts and workstations.

- Employees should cover their mouths and noses with a tissue when they cough or sneeze and throw used tissues in the trash. If employees don't have a tissue, cough or sneeze into your elbow, not your hands. Immediately wash your hands after blowing your nose, coughing, or sneezing. Learn more about coughing and sneezing etiquette.

- At minimum, employees should wash their hands after they have been in a public place, after touching their face covering, after blowing their nose, coughing, or sneezing, after using the restroom, after touching any common contact surfaces, and before eating. **Avoid touching eyes, nose, or mouth with unwashed hands.**

- Employees should wash hands with clean, running water, apply soap, lather and scrub for at least 20 seconds, then rinse. Dry hands using a clean paper towel or air dry. When soap and water can't be used, use an alcohol-based hand sanitizer that contains at least 60% ethanol or 70% isopropyl alcohol. Any use of alcohol-based hand sanitizers should follow local and State guidelines.

Screening and Temperature Check

- Conduct employee temperature screening and wellness checks before each shift. **(NOTE: be sure to comply with OSHA's Access to Employee Exposure Medical Records standard for confidentiality.)**
  - Temperature screening methods can include manual (use non-contact infrared thermometers) or thermal camera meeting FDA recommendations. Additional screening information/guidance can be found on the CDC website.
  - Assign an employee to manage and conduct the temperature screenings while following CDC guidelines in the above link. If this is not possible, employees can self-check their own temperature.
  - Screening should be done in a manner such that the privacy of employees is respected.
  - Perform a visual inspection for other signs of illness (e.g., flushed cheeks, rapid or difficulty breathing without recent physical activity, fatigue, extreme fussiness, cough).
  - Employees who have a fever of 100.4˚ F (38˚C) or above, or other signs of illness should not be admitted to the facility.

- Employers can consider incorporating a wellness questionnaire with questions such as:
  - Have you, or a person you have been in close contact with, been diagnosed with COVID-19

within the last 14 days? (close contact is 6 feet or less for more than 10 minutes.)

– Have you experienced any cold or flu-like symptoms in the last 72 hours (to include fever, shortness of breath, cough, sore throat, difficulty breathing, nausea, vomiting, and diarrhea)?

– Have you traveled to an international or domestic "hot" spot in the last 14 days?

– There are a number of examples available for wellness questionnaires (see Resources below).

- Require employees who have symptoms or signs (i.e., fever, cough, or shortness of breath) or who have a sick family member at home with COVID-19 to notify their supervisor and stay home.

- Sick employees should follow the CDC-recommended steps. Employees should not return to work until the criteria to discontinue home isolation are met in consultation with healthcare providers and state and local health departments. Consider waiving requirements for medical documentation during the pandemic, as CDC has advised people with mild illness NOT to go to the doctor's office or emergency room.

- If employee is sick or receives positive COVID-19 test results, results should be reported to employer. In the case of a positive COVID-19 test result, the employee must stay home until cleared for physical return to the workplace by their medical provider, following the CDC's Discontinuation of Isolation for Persons with COVID -19 Not in Healthcare Settings.

- If an employee tests positive:

– Follow federal, state, and local recommendations for reporting and communicating cases, while remaining compliant with regulations and guidelines pertaining to protecting private health information such as confidentiality required by the Americans with Disabilities Act (ADA). See OSHA for guidance on reporting workplace exposures to COVID-19.

– Engage HR immediately and enforce all applicable HR rules and regulations.

– The employee shall be isolated to the area they are in currently and removed from the work site for a minimum of 14 days.

– Any individuals having "close contact" (within approximately 6 feet) with the sick employee should also be isolated from the work site for 14 days; and all other employees should continue to follow physical distancing rules. Communicate and reinforce with employees, while maintaining PII and HIPAA requirements, that they may have been exposed and to closely monitor their health, temperature, and current symptoms as identified by the CDC. Contact tracing and sharing of employee information should be done under the guidance of Human Resources due to privacy requirements of HIPAA, ADA, and EEOC. See the CDC's "Coronavirus Disease 2019 (COVID-19) General Business Frequently Asked Questions".

– Enhanced cleaning and disinfecting should be done immediately by trained personnel, who should wear face coverings and gloves, dispose of gloves after use, and wash hands and face when complete. Visibly dirty surfaces shall be cleaned using a detergent or soap and water PRIOR to disinfection.

– For disinfection, use only EPA-registered disinfectants on List-N.

- For transparency, each contractor should notify the client of the situation (involving your HR professional to ensure privacy requirements are followed and maintained).

- Employer Human Resources engages to provide supportive care to worker and family.

- Follow CDC guideline and exposure protocol for Critical Infrastructure Workers.

– CDC interim guidance

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Enhanced Cleaning and Disinfecting Practices

- Select appropriate disinfectants – consider effectiveness and safety.

  - The U.S. Environmental Protection Agency (EPA) has developed a list of products that meet EPA's criteria for use against SARS-CoV-2.

  - Do not mix different EPA registered chemicals together. The combination could be toxic by inhalation. Be particularly careful when using any products containing ammonia, sodium hypochlorite (bleach), or hydrogen peroxide.

  - Review product labels and Safety Data Sheets (SDS) and follow manufacturer specifications for cleaning/disinfecting.

  - Consider consulting an Occupational and Environmental Health and Safety (OEHS) Science Professional or Industrial Hygiene expert if additional advice is needed. AIHA has a consultants list of such qualified professionals.

- Establish a disinfection routine.

  - Ensure disinfection protocols follow product instructions for application and contact time. All items should be allowed to dry thoroughly after cleaning and disinfecting.

  - Use disposable wipes or rags when available. If not available, ensure rags are maintained, handled, and cleaned per product instructions.

- Consider developing a standard operating procedure, a checklist, or audit system to consistently train employees on enhanced cleaning and disinfecting practices or to track when and how cleaning and disinfecting is conducted. Note that this may be a requirement in some states or local jurisdictions.

- Single-use items and used disinfection materials can be treated as regular waste, following regular safety guidelines.

- Any reused cloth materials should be washed and dried on the highest temperature setting allowable for the fabric.

- Deeper cleaning and disinfecting protocols should be developed and implemented in cases where confirmed cases of COVID-19 are discovered. Refer to AIHA's Workplace Cleaning for COVID-19.

- Provide Safety Data Sheets (SDS) for cleaning and disinfection products and ensure employees are aware of the hazards of use. Incorporate new hazards into existing OSHA Hazard Communications Program.

- Employees should receive, at minimum, awareness training on cleaning and disinfection products used in the workplace following OSHA Hazard Communication Standards. For employees who will use cleaning and disinfecting products, training should also include proper use, PPE, disposal, and all precautionary measures.

Ventilation

- Provide natural ventilation by opening windows and doors whenever possible to increase air flow. If windows and doors cannot remain open, provide good indoor air quality by:

  - Keeping HVAC system operational to maintain thermal comfort and maximize outdoor air based on system design.

  - Maintaining the relative humidity at 40-60%.

  - Limiting the use of portable pedestal or overhead ceiling fans.

- If you need assistance on HVAC issues, ask an HVAC professional and see the American Society of Heating, Refrigerating, and Air-Conditioning Engineers' (ASHRAE) COVID-19 (Coronavirus) Preparedness Resources updates for more information.

  - AIHA Occupational and Environmental Health and Safety (OEHS) Science Professionals and industrial hygienists are also well versed in general

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dilution ventilation. AIHA has a consultants list of such qualified professionals.

Restrooms (NOTE: See Supplement guidance on use of air dryers)

- Post signage limiting restroom occupancy to allow for proper physical distancing and to remind employees and visitors to wash hands before and after using the restroom.

- Minimize touchpoints entering and existing restrooms, if possible.

- If the door cannot be opened without touching the handle, provide paper towels and a trash can by the door so a paper towel can be used when touching the handle and then discarded.

  – Consider controlling access to bathrooms with a key so disinfection measures can be better managed. If a key is used, consider disinfecting it after each use.

- Doors to multi-stall restrooms should be able to be opened and closed without touching handles if possible.

- Place signs indicating that toilet lids (if present) should be closed before and after flushing.

- Use no-touch faucets, towel dispensers, soap dispensers, and waste receptacles when possible.

- Hand soap should be readily available for use by occupants.

- Provide paper towels and air dryers in restrooms.[1]

  – The WHO and CDC currently state that hands can be dried using a paper towel or hand dryer.

  – Due to current uncertainties surrounding the transmission of SARS-CoV-2, care should be taken when using a hand dryer or paper towel.

  – The use of touch or push hand dryers is discouraged due to possible surface contamination. If hand dryers are used, consider touchless devices.

- Businesses and employers should work with HVAC professionals to ensure that bathrooms are well ventilated, and if filtration is used, that proper filtration practices are being followed.

- Increase frequency and efforts to keep bathrooms clean and properly disinfected and maintain a record of sanitary work practices.

What should an Employee do to protect themselves?

- Employees should evaluate their health continuously; if they are sick, have a fever or symptoms, or someone at home is sick, then they should remain home. **NOTE: Employer HR Policies, HIPAA guidelines and other laws should be followed at all times.**

- If an employee tests positive for COVID-19:

  – Stay home and isolate until cleared for physical return to the workplace by your medical provider, following the CDC's Discontinuation of Isolation for Persons with COVID -19 Not in Healthcare Settings.

  – Contact your supervisor and report your results as soon as possible.

  – Notify your supervisor about others in the workplace with whom you came into contact.

- Depending on local requirements, in alignment with CDC recommendations, wear a cloth or disposable face covering whenever physical distancing cannot be maintained (indoors or outdoors). Ensure the face covering is properly maintained and cleaned. Additional information on cloth face coverings can be found on CDC's website. **(NOTE: Cloth or disposable face coverings primarily protect other people. A cloth or disposable face covering is not a substitute for physical distancing.)**

[1]NOTE VERSION CHANGE: In version 1 of this guidance document, in the section titled "Restrooms" it stated to disconnect or tape off the hand dryer. NOTE: See Supplement guidance on use of air dryers.

- Maintain cloth or disposable (or better if you have it) face covering, clean or replace frequently, and use at minimum when unable to maintain physical distancing of 6-feet.

- With the exception of children less than two, and individuals who have difficulty breathing, are unconscious, or otherwise unable to remove a face covering without assistance, CDC recommends that all people wear a cloth or disposable face covering in public settings and when around people who don't live in their household, especially when other physical distancing measures are difficult to maintain.

- Non-medical cloth or disposable face coverings or masks are NOT Personal Protective Equipment (PPE), but they do offer some protection to others and should be worn while near other people in common spaces or shared workspaces. They are not a substitute for physical distancing, engineering controls, cleaning and disinfecting, proper hygiene, or staying home while sick.

- Remove cloth or disposable face coverings correctly and wash hands after handling or touching a used face covering.

- Wash cloth face coverings after each use. Cloth face coverings can be included with regular laundry. Use regular laundry detergent and the warmest appropriate water setting for the cloth used to make the face covering. Use the highest heat setting and leave in the dryer until completely dry. If air drying, lay flat and allow to completely dry. If possible, place in direct sunlight.

NOTE: If an employer chooses to provide or the employee supplies their own N95 respirator, please fully consider all the potential OSHA requirements.

- At minimum, employees should wash their hands after they have been in a public place, after touching their face covering, after blowing their nose, coughing, or sneezing, after using the restroom, after touching any common contact surfaces,

and before eating. **Avoid touching eyes, nose, or mouth with unwashed hands.**

- Maintain good hygiene practices (washing hands with soap and water for 20 seconds or a hand sanitizer with at least 60% ethanol or 70% isopropyl alcohol). For more information, refer to CDC's handwashing guidelines.

- If an employee tests positive for COVID-19:

  – Stay home and isolate until cleared for physical return to the workplace by your medical provider, following the CDC's Discontinuation of Isolation for Persons with COVID -19 Not in Healthcare Settings.

  – Contact your supervisor and report your results as soon as possible.

  – Notify your supervisor about others in the workplace with whom you came into contact.

- Let your employer know if you have concerns about personal protective equipment (PPE) that may be provided to you and that you are properly instructed on how to use it. The CDC has recommended sequences for donning and doffing PPE.

Worker Rights

AIHA believes that basic protections are worker rights, as well as an essential ingredient of occupational health and safety systems, and that employers must provide a safe and healthful work environment.

Resources

- AGC: The Construction Association – Pro- active Measures for Addressing COVID-19 / Pre-Screening Questionnaire

- AGC: The Construction Association - COVID-19 Recommended Practices for Construction Jobsites

- **Cybersecurity and Infrastructure Security Agency CISA resource on Critical Infrastructure Workers**

- CDC Health Screening ["Should we be screening employees for COVID-19 symptoms?" section](#) of General Business Frequently Asked Questions
- Numerous wellness questionnaire examples are available online (e.g., [South Dakota Department of Health's COVID-19: Employee Screening Questions and Guidelines](#))
- The EPA has developed a [list of disinfectants](#) for use against SARS-CoV-2.
- American Society of Heating, Refrigeration, Air-conditioning Engineers [ASHRAE COVID 19](#) resource for ventilation
- [CDC Interim Critical Infrastructure Guidelines](#)
- Foundation for Manufacturing Excellence's [COVID-19 Guidance & Resources for Small and Medium Manufacturers](#)
- AIHA's Indoor Environmental Quality Committee developed these guidance documents about re-opening and cleaning buildings after closures due to COVID-19: [Recovering from COVID-19 Building Closures](#) and [Workplace Cleaning for COVID-19](#).
- [American Cleaning Institute's COVID-19 Resources](#)
- AIHA's [Considerations on the Safe Use of UVC Radiation](#)
- AIHA's [Focus on Construction Health: COVID-19](#)
- AIHA's [Effective and Safe Practices: Guidance for Custodians, Cleaning and Maintenance Staff](#)
- AIHA's [Employers Guide to COVID-19 Cleaning & Disinfection in Non-Healthcare Workplaces](#)
- AIHA's [Reducing Risk of COVID-19 Using Engineering Controls](#)
- AIHA's [PPE for SARS-CoV-2](#)
- AIHA's [Use of Real Time Detection Systems](#)
- AIHA's [Proper Use of Respirators for Healthcare Workers & First Responders](#)
- AIHA's [Workers Rights White Paper](#)

Disclaimer

AIHA is not legally responsible and shall be held harmless from all claims, causes of action, and demands, whatsoever, any third party may incur on account of damage, loss or injury resulting from adhering to these guidelines.

These guidance documents were primarily developed for those smaller business that don't have readily available occupational health and safety resources, and designed to help business owners, employers, employees and consumers implement science-backed procedures for limiting the spread of the coronavirus. They are subject to any local, state, or federal directives, laws, or orders about operating a business and should only be used if they do not conflict with any such orders. These documents are subject to revision and shall be updated accordingly.

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AIHA is the association for scientists and professionals committed to preserving and ensuring occupational and environmental health and safety (OEHS) in the workplace and community. Founded in 1939 as the American Industrial Hygiene Association® (AIHA®), we support our members with our expertise, networks, comprehensive education programs and other products and services that help them maintain the highest professional and competency standards. More than half of AIHA's nearly 8,500 members are Certified Industrial Hygienists (CIH), and many hold other professional designations. AIHA serves as a resource for those employed across the public and private sectors, as well as to the communities in which they work. For more information, visit AIHA.org.

About Occupational and Environmental Health and Safety Professionals

Occupational and environmental health and safety (OEHS) professionals (also known as industrial hygienists) practice the science of anticipating, recognizing, evaluating, controlling and confirming workplace conditions that may cause workers' injury or illness. Through a continuous improvement cycle of planning, doing, checking and acting, OEHS professionals make sure workplaces are healthy and safe.

- Get additional resources at AIHA's Coronavirus Outbreak Resource Center.
- Find a qualified industrial hygiene and OEHS professionals near you in our Consultants Listing.

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Periodically scan this QR Code to check if any new versions of AIHA's guidance documents have been posted, as well as to find guidance documents for other businesses and industries.

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Communication

Posters that are visible through the workspace for general public and employees or as a quick take-away.
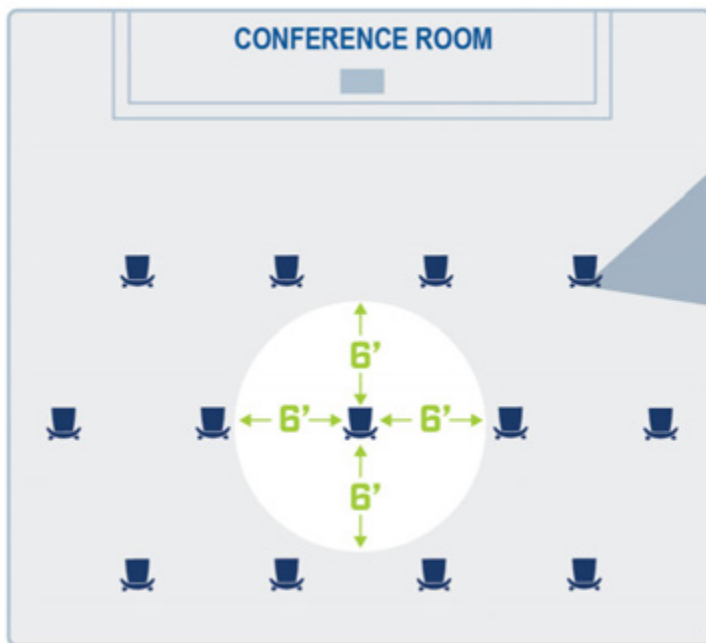
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