

EPA Comments on Field Program COVID-19 Management Plan, Prepared by Anchor QEA, LLC

Comments dated April 3, 2020

Following are the U.S. Environmental Protection Agency's comments on the Field Program COVID-19 Management Plan prepared by Anchor QEA, LLC for use at the Gasco Sediments Site.

General Comments on Field Program COVID-19 Management Plan:

None.

Specific Comments on Field Program COVID-19 Management Plan:

1. **Introduction, 4th paragraph:** Suggest removing "Until the CDC declares a pandemic" since most agencies, including the CDC, have declared it a pandemic. Simply state screening is optional, if it is for Anchor QEA employees.
2. **Prior to Coming to Site:** In 1st bullet, clarify that exposure to, or close contact with, an infected individual means being within 6 feet of that person for an extended time or being exposed to their cough or sneeze.
3. **Prior to Coming to Site:** In 2nd bullet, clarify that symptoms include cough, difficulty breathing, fever, losing sense of taste or smell, or common cold or flu symptoms.
4. **Prior to Coming to Site:** Add a bullet which states you will not report to site work if you have been informed that you were potentially exposed to COVID-19. You will need to self-quarantine and obtain medical release prior to returning.
5. **Prior to Coming to Site:** Add a bullet with states you will not report to site work if you share a household with a healthcare professional that may have been exposed to COVID-19. You will need to self-quarantine and obtain medical release prior to returning.
6. **Prior to Coming to Site:** Add a bullet which states that in general, a sick employee may return to the site once their health care provider has given them a medical release to return to duty. Employees that test positive for COVID-19 will need to test negative two consecutive times before returning.
7. **Confirmed Case Response and Equipment & Facility Decontamination:** Add that when an employee is in self-quarantine, a safety employee or manager will check in on that individual twice a day for a wellness update. This update will include a self-reported temperature reading. Potential evacuation of the site will be evaluated on a case-by-case basis.
8. **General Measures/Guidance:** In 2nd bullet, include that hand shaking will be avoided, using non-contact greetings.
9. **General Measures/Guidance:** In 4th bullet regarding hand washing, add that hands should be washed thoroughly for a minimum of 20 seconds.
10. **General Measures/Guidance:** In 6th bullet, revise the 1st sentence to clarify that any time in large groups or crowds will be avoided, whether inside or outside. And state that any field activities, whether inside or outside, should be planned to minimize employee density in that location.
11. **General Measures/Guidance:** Regarding the 2nd to last bullet about employees having their own PPE, clarify that in event respirators must be shared, they must be fully sanitized in between uses. Also, that respirators and PPE will be cleaned/disinfected when doffing, along with a thorough arm, hand, and face washing when exiting.

12. **General Measures/Guidance:** Suggest adding a bullet about avoiding use of shared beverage (e.g., coffee pots, water coolers) or food setups (e.g., pizza, buffets). For instance, bring an individual water bottle.
13. **General Measures/Guidance:** Suggest adding the following bullets:
 - a. Limit air travel and avoid mass transit services. Avoid carpooling.
 - b. Masks or similar are encouraged to prevent face touching and distribution of sneezed particles; N95 masks are less effective with facial hair present.
 - c. The virus may live on a variety of surfaces for many days; closely follow the cleaner/disinfectant contact time. Avoid combining products that are incompatible and may create toxic byproducts.
 - d. Avoid restaurants if open; use drive-in or take out services.
 - e. When at hotels, disinfect your own room with EPA registered cleaners or alternatives, and use the NO HOUSEKEEPING sign to minimize the people coming into your room.
 - f. Catch coughs and sneezes with a disposable tissue, etc. and throw away, then wash hands. If tissue not available, direct coughs and sneezed into elbow.