

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

Comments dated April 10, 2020

Following are the U.S. Environmental Protection Agency's supplemental 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:

Per EPA's updated COVID-19 Safety Protocol: *"Every effort should be made to ensure that there is a Site Safety Officer (SSO) onsite who has Emergency Medical Technician (EMT) training or access to an EMT on site. Possible sources of personnel with EMT training include response contractors, the USCG Strike Team and local fire departments. The Site Safety Officer shall make daily observations of all staff on the response, including taking body temperatures and monitoring for other symptoms. For a large response conducted during this COVID-19 Pandemic, a Paramedic support unit should be requested from local emergency services, if available. It is critical that all response personnel are continuously monitored and strictly follow the site Health and Safety Plan (HASP)"*

Consider working this recommendation for site safety officers into the document wherever appropriate.

Specific Comments on Field Program COVID-19 Management Plan:

1. **Prior to Coming to Site:** Add that prior to departing for the site, employees should obtain EPA-registered disinfectants, wipes, and hand sanitizers.
2. **Onsite Preventative Measures:** Include the protocol of conducting a daily health status screening and temperature screening of site workers. For any employee check-ins or screening, only one person should log it in, ideally doing this electronically. Do not pass around a clipboard or pen. Question reporting personnel as to previous travel and health. Follow HIPAA requirements to safeguard medical and other personal information.
3. **Onsite Preventative Measures:** Include at mention of EPA registered cleaners, that employees should consult EPA List-N Disinfectants list for recommendations. Region 10 has provided the following table as a summary from the list:

Sanitizer Information Sheet				
Cleaning Solution	Suggested Use	Contact Time	Pros	Cons
70% alcohol wipes	Sanitizing surfaces and equipment	5 minutes or until product evaporates	Easy to use, no mixing or diluting. Safe for use on equipment	Limited quantities. May go through a lot of wipes in a day
70% Isopropyl Alcohol Solution	Sanitizing surfaces and equipment	5 minutes or until product evaporates	Safe for use on equipment.	Flammability risk, expensive ingredients
10% Bleach in Water Solution	Sanitizing surfaces <i>Note: Use in well ventilated areas</i>	1 minute to 10 minutes and let air dry <i>Note: we have a few brands of bleach available at the LCs. Please read the label; contact times vary per manufacturer</i>	Cheap, abundant quantities in R10	Corrosive. Can be damaging to metal, plastic, and rubber surfaces. Can bleach porous materials. Not recommended for equipment. Longer process time with air drying. Incompatible with quaternary (ammonium containing) agents.