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Work and COVID-19

OSHA Fundamentals for the Oil and Gas Industry

OSHA issued new guidance on July 8, 2020, for the oil and gas industry as part of its ongoing series of industry-specific guidance for mitigating occupational exposure risks to COVID-19. This guidance supplements OSHA's Guidance on Returning to Work and the Interim Guidance from the CDC and OSHA for Manufacturing Workers and Employers, which applies to certain oil and gas operations, including refineries.

Hazard Assessment and Exposure Risk Levels

The first step in the OSHA guidance is to conduct a detailed hazard assessment to identify exposure risks in the workplace. The guidance states that most anticipated work tasks in the oil and gas industry are associated with lower and medium exposure risk levels, and the "high" and "very high" exposure risk categories likely are not applicable. Specifically, for oil and gas drilling, servicing, production, distribution, and/or processing tasks that do not require frequent close contact with coworkers, contractors, customers, or the public, the guidance states such tasks have a lower exposure risk. But for those tasks that require close contact (within 6 feet) with coworkers, contractors, customers, or the general public, such tasks have a medium exposure risk level.

Engineering Controls

The guidance states that changes in production practices may be necessary to maintain appropriate social distancing among workers. Redefining distances among workers may include reconfiguring communal work environments so that workers are spaced at least 6 feet apart. Other engineering controls include modifying the alignment of workstations, including control panels/boards so that workers do not face each other. Employers should consider using floor markings and signs to remind workers to maintain appropriate distancing at all times, including while on breaks.

Other physical barriers, such as strip curtains, plexiglass, or other impermeable dividers should be used, if feasible, to separate workers from each other where doing so does not create additional safety hazards, such as reduced visibility in or around work vehicles or other equipment.

Additionally, the guidance recommends that facilities consider consulting with an HVAC engineer to ensure adequate ventilation in work areas to help minimize occupational exposures. Opening windows and internal doors, where possible, and the use of fans are encouraged. If fans are used in a facility, employers should take steps to minimize air from fans blowing from one worker or workstation directly at another.

Administrative Controls

In addition to the engineering controls, employers are encouraged to do the following to promote social distancing:

- Stagger arrival, departure, and break times to avoid workers congregating in common areas, including parking areas, locker and shower rooms, smoking areas, and control rooms;
- Encourage single-file movement with at least 6 feet between all workers throughout the facility;
- Provide floor markings and signs to remind workers to maintain social distancing at all times;
- Designate workers to monitor and facilitate distancing;
- Limit occupancy in doghouses (shelters), control rooms, and other operating areas;
- Limit meeting sizes and/or hold meetings virtually or outside;
- Remove or rearrange break rooms, controls rooms, and other areas (e.g., removing chairs or tables, etc.) to increase worker separation. This may require identifying alternative areas to accommodate overflow volume, such as training and conference rooms or using outside tents for shaded break and lunch areas;
- Encourage workers to avoid carpooling to and from work and job sites. If carpooling or using company shuttles is necessary, limit the number of people per vehicle as much as possible, encourage proper hand hygiene, open vehicle windows when possible, encourage the use of face coverings, and clean and disinfect commonly touched surfaces (door handles, handrails, seatbelt buckles) after each carpool or shuttle trip;
- Consider keeping the same workers assigned to the same shifts;
- Establish a system for employers to safely alert their supervisors if they are experiencing signs or symptoms of COVID-19 or if they have had recent close contact with a suspected or confirmed COVID-19 case;
- Provide training on COVID-19 related safety protocols;
- Provide handwashing stations equipped with soap, running water, and single-use paper towels, or in the alternative, alcohol-based hand sanitizers in multiple locations;
- Clean and disinfect shared equipment such as headsets, operating terminals, and other routinely-touched items between shifts;
- Provide disposable drinking water cups or individual bottles of water in hydration stations and disposable plates and silverware in breakrooms.

Face Coverings and PPE

OSHA's guidance also states that oil and gas workers should wear cloth face coverings, especially in common areas like the drill deck, doghouse, control rooms, and office spaces in trailers. Employers should ensure all cloth face coverings:

- Fit over nose and mouth and fit snugly against the side of the face;
- Are secured with ties or ear loops;
- Include multiple layers of fabric;
- Allow for breathing without restriction;
- Can be laundered using the warmest appropriate water setting and machine dried daily after the shift, without damage or change to shape;
- Are not used if they become wet or contaminated;
- Are replaced with clean replacements, provided by the employer, as needed;
- Are handled as little as possible to prevent transferring infectious materials to the cloth; and
- Are not worn with or instead of respiratory protection when respirators are needed.

The guidance acknowledges that most oil and gas workers in normal work environments are unlikely to need PPE beyond what they use to protect themselves during routine job tasks. A hazard assessment, however, should be conducted to determine the proper PPE for industrial hazards. Employers should consider whether gloves, face, or eye protection should be used when certain work activities require workers to be within 6 feet of one another and other engineering or administrative controls cannot prevent worker exposure. Employers must also consider possible new hazards created by new PPE in the work environment (PPE catching in machinery, limiting worker dexterity or vision, etc.).