

Energy Sector COVID-19 Safety Planning Frequently Asked Questions (FAQ)

Below are the energy sector questions and WA State Labor and Industry (LNI) responses.

Any changes provided by LNI will be **Bold**. New questions and response will be at the top of the document and will also be **Bold**.

Secretary of Health and Washington Governor announced a public health mandate to wear face coverings in public places indoors and outdoors effective Friday, June 26th 2020. [Full information located here.](#)

Question: Are workers brought in to Washington State from non-contiguous states to perform emergency restoration operations required to follow the 14 day self-quarantine requirement found in the Phase 2 Construction COVID 19 Job Site Requirements?

Response: Most electrical emergency restoration operations performed in response to power outages caused by storms or other concurrent emergencies or disasters, such as electrical power restoration and substation repair, is performed by qualified electrical workers and regulated by WAC 296-45 Electric Power Generation, Transmission and this work is not subject to the Phase 2 Construction COVID-19 Job Site Requirements.

When emergencies or disaster including severe storms cause wide spread power outages, electric utilities will often have to bring in workers to Washington State from noncontiguous states to perform or directly support emergency restoration activity. Workers brought into Washington State from noncontiguous states to perform or directly support electric emergency restoration operations are not covered by the 14-day self-quarantine requirement in the Phase 2 Construction COVID-19 Job Site Requirements.

For all other emergency restoration activities included gas and liquid pipelines workers brought in from noncontiguous states would be subject to the 14 day quarantine because it is considered construction work and would fall under the scope of the Phase 2 Construction COVID-19 Job Site Requirements.

Question: Is "line crew maintenance work" included in the Phase 1 construction requirements? (Based on new and more recent guidance on masks, this response has been updated and reflected with responses to questions below).

Updated

August 26, 2020

References:

Public Health mandate for mask (6/23/2020 & updates)

Construction phase 1 & 2 restart requirements & other restart requirements phase 1 -2 currently.

Critical Infrastructure Safety Guide

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Response: Line crew maintenance work is NOT included in the Phase 1 construction document. Updated from guidance all employees are required to wear a mask, for specific questions and responses please continue to read below.

Question: Will the Bonneville Power Administration (BPA) need to comply with the phase 1 construction safety requirements if they are a federal entity but located in Washington State?

Response: Yes, compliance is not limited to just phase 1

Question: WAC code referenced regarding potable water does not specify water temperature whereas the DOSH requirements specify using hot and cold (or tepid) running water for cleansing.

When running water is not available, portable washing stations, with soap, are required, per WAC 296-155-140 2(a) – (f). Alcohol-based hand sanitizers with greater than 60% ethanol or 70% isopropanol can also be used, but are not a replacement for the water requirement.

Since providing hot water adds some complexity, we'd like clarification on whether hot water is needed on these worksites.

Response: #15 and #16 of the Phase 1 Construction Restart document state:

15. Soap and running water shall be abundantly provided on all job sites for frequent handwashing. Workers should be encouraged to leave their workstations to wash their hands regularly, before and after going to the bathroom, before and after eating and after coughing, sneezing or blowing their nose.

16. When running water is not available, portable washing stations, with soap, are required, per WAC 296-155-140 2(a) – (f). Alcohol-based hand sanitizers with greater than 60% ethanol or 70% isopropanol can also be used, but are not a replacement for the water requirement.

WAC 296-155-140(2)(a) states: You must provide clean, tepid wash water, between 70 and 100 degrees Fahrenheit, at all construction sites.

Given the Phase 1 document requires running water or if not available, a portable wash station, the exception in 155-140(2)(d) will not apply.

Phase 2 information - Hand-washing stations, with soap and running water, shall be abundantly provided on all job sites for frequent handwashing. When running water is not available, portable washing stations, with soap, are required.

Question: From the State FAQs, it appears Phase 1 is about residential construction projects. As a utility performing an existing approved function such as gas equipment activation and inspection outside. The new change of scope of a worksite definition within an "occupied home?" Are utilities required to disinfect gas/electric equipment components touched during an activation?

Response: Number 20 of the Phase 1, Phase 2 is number 17 Construction Restart document addresses requirements for performing work inside of a home/dwelling. If the activation/inspection took place in an occupied home (people are living in the home), then the requirement would have to be met.

Question: Does the Phase 1 construction requirements cover sub-contractors as well? (If contractors are meeting the job site requirements is there a need to double/triple efforts by subcontractors?)

Response: The Phase 1 Construction Restart requirements apply to all construction activities. Employers engaged in a construction activity are required to comply with the requirements. There are cases where a sub-contractor may not have to specifically meet a requirement. For example: where a general contractor has developed and posted an exposure control, mitigation, and recovery plan and a sub-contractor has reviewed that plan, communicated that plan to their employees, a sub-contractor would not have to develop a duplicative plan.

Question: Does the "COVID Site Supervisor" have to be a person from management side of the business or can it be anyone within a company's organization? Is this person's main job to be a social distancing monitor or are there other tasks they should be doing? Do we need a "COVID site supervisor" on jobs with fewer than seven people on site? Does it apply to residential and commercial?

Response: The Phase 1 Construction Restart document applies to all construction activities in Washington. #1 of the Phase 1 Construction Restart document states:

A site-specific COVID-19 Supervisor shall be designated by the contractor at every job site to monitor the health of employees and enforce the COVID-19 job site safety plan. A designated COVID-19 Supervisor must be present at all times during construction activities, except on single-family residential job sites with 6 or fewer people on the site.

The COVID Supervisor can be any person the employer designates.

Phase 2 states:

A site-specific COVID-19 Supervisor shall be designed by the contractor at every job site to monitor the health of employees and enforce the COVID-19 job site safety plan. A designated COVID-19 Supervisor must be present at all times during construction activities, except on single-family residential job site with 6 or fewer people on the site. The name and contact information for the site specific COVID-19 Supervisors must be clearly displayed on all jobsite COVID-19 required postings.

Question: Are masks required at all times or just when social distancing cannot be maintained?

Response: Masks must be worn at all times by every employee on the worksite.

Question: We'd like some clarification from the Critical Infrastructure Safety Planning Guidance since not all critical infrastructure work can be done outside of the 6-foot distance requirements. What is the best way to provide this clarification for LNI inspectors and for the energy sector?

Response: In situations where the language in WAC 296-45 mandates that two qualified electrical workers are required for specific tasks and the nature of the work means that the mandatory six feet of social distancing can't be maintained (such as performing line work from a bucket truck or working in enclosed network and URD vaults) the employer must provide and make sure the qualified electrical workers use appropriate personal protective equipment for the hazards of the work activity.

Determining the appropriate level of COVID-19 protection must be included in the employers hazard assessment for the particular task. If the hazard assessment determines that wearing an FR face covering and face shield or safety glasses would create a greater hazard, the employer must make sure the qualified workers wear at least an arc flash face shield that is rated for the potential arc flash hazard.

This only applies to work covered by WAC 296-45 that requires two qualified electrical workers to perform. Previously issued guidance about enforcing Gov. Inslee's executive order on wearing face covers is still in effect for workers performing any activity that fall under the scope of other safety and health standards.

Question: Has Washington, specifically LNI High Voltage Department, adopted the use of masks other than in the links below? [WA Coronavirus Hazard Considerations for Employers](#) [WA DOH Guidance on Cloth Face Coverings](#)

Response: This is addressed in the above new response from LNI.

Question: Labor and Industry guidance for protection from COVID-19 has consistently mentioned face shields as acceptable for limiting the spread of the virus. Is it acceptable for Construction employees to use a face shield in lieu of a face mask? This will help minimize the added breathing resistance posed by a mask and help reduce the impact of working in warm or hot weather. The sector is concerned that 100% use of face masks could increase the risk of heat related illness with the temperatures increasing.

Response: The cloth facial coverings do not cover enough of the body to be included in the heat stress rule as other facial respiratory protection is not covered as well. If the employer would like to apply the heat stress rule for cloth facial coverings at 77 Degrees they could effectively manage any heat stress concerns. Remember to drink water and provide adequate breaks.

Based upon information from the Washington State Department of Health and the Center for Disease Control, face coverings are to be tight to the face without leaving gaps. This keeps any droplets that are released into the air from reaching the nose and mouth. A face shield is not tight to the face and although would provide adequate protection from the direct front of the wearer, it would not provide protection from the side.

Question: Crews are returning to work and requesting clarification on new criteria that goes into effect on June 8th for critical infrastructure workers who have already been working. Are they now required to wear a face mask unless they working alone. Clarification on what qualifies working alone.

Response: Current definition of "working alone", Someone is considered to be working alone when they're isolated from interaction with other people and have little or no expectation of in-person interruption. How often a worker is able to work alone throughout the day may vary.

Examples of working alone include:

- A lone worker inside the enclosed cab of a crane or other heavy equipment, vehicle, or harvester.
- A person by themselves inside an office with four walls and a door.
- A lone worker inside of a cubicle with 4 walls (one with an opening for an entryway) that are high enough to block the breathing zone of anyone walking by, and whose work activity will not require anyone to come inside of the cubicle.

- A worker by themselves outside in an agricultural field, the woods or other open area with no anticipated contact with others.

Barriers:

- Barriers block any direct path between faces.
- Any open air path between two people (around the barrier) must be greater than 6 feet.
- Barriers should extend upward to prevent coughing or sneezing over the barrier.
- Barriers must extend at a minimum 12 inches above the head of people using the barrier.
- The barrier must cover the full range of motion for the people relying on the barrier
- Ventilation patterns need to be checked to ensure fresh air is getting to all users and that air currents are not flowing around the barrier in a way that could carry contamination around it.
- Barriers can be useful even if they do not provide complete isolation, to enforce distancing and limit exposure.
- We are allowing people to remove their cloth facial coverings under these circumstances

Question: And do cubicles count as an “office”? We have not had our administrative employees come back to work yet, but they are still critical infrastructure employees as we understand it, would they be required to wear masks?

Response: If a worker is at their desk (cubicle) or office and is maintaining social distancing from others then they can be considered working alone, however if they were to get up and go interact with any other person then they would no longer be working alone and would need to wear a cloth facial covering.

Question: Clarification on working alone and new guidance that everyone should be wearing a mask while working for a few specific situations for the energy sector.

Example 1 - Electrical workers working on power lines where immediate and direct communication is critical for safety measures, communication occurs via "shouting" and at times via radio and the concern that masks could impact the ability for what is being shouted to be understood by the spotters for person in the bucket. The specific situation would be to have three people (1 in the bucket, & 2 spotters on the ground all of them maintaining more than 6 feet apart outside, estimate 30 feet apart). Based on the recent guidance that all persons should wear a mask while working would it still apply in this situation, or does this demonstrate the ability to maintain more than enough distance outside and masks would not be required during this particular situation?

Response: This is covered by the updated response just above when the work is covered by high voltage rules in WAC 296-45. Face coverings would be required for workers doing work covered by other safety and health rules.

Example 2 - Where there are 2-10 people working in a large power house facility or other large warehouse sized facility working in different areas, would this qualify as working alone based on previous responses and the ability to maintain 6 feet physical distance.

Response:

The answer depends on several different factors:

- If workers are effectively separated by barriers, including cubicle walls, they may be considered alone. The barriers need to separate the worker from workers in all directions, including people who may walk by.
- If there are no barriers, the workers must be at workstations which are clearly 6 feet apart. People move around in their station, so desks, workbenches, or assembly work stations need to be about 12 feet or more apart to allow for people to move around and maintain 6 foot separation. For more mobile work, the worker's personal workspace may be designated with floor markings or other means so that they are separated from other worker's stations and any common travel paths around their area.
- Air flow in the area should be checked to make sure air does not move quickly between workstations or around barriers.
- When workers are outside their assigned workstation, they need to wear their mask when they may encounter others.
- If a supervisor or other worker is entering someone else's workstation, they need to alert the worker their so that they can don their mask.
- In general it would be easier and safer for everyone to wear a mask or other face covering

Question: The question from Phase 2 construction guidance - Any worker performing construction craft work in Washington from any state that is not contiguous to Washington must self-quarantine for 14 days to become eligible to work on a job site in Washington. As an alternative to the quarantine provisions of this section, any worker performing construction craft work entering the state from a non-contiguous state, shall be considered eligible for work upon receipt of negative test results for COVID-19 administered within Washington State.

Response: "If the work crews that arrive come from outside of Idaho or Oregon and would be conducting work that falls under the scope of the construction safety rules from Chapter 155, the requirements of the 14 day quarantine or proof of a negative test will apply. If the work is not covered by Chapter 155 the requirements would not apply".