

RISK MANAGEMENT DURING THE COVID-19 PANDEMIC

Information on the novel coronavirus (a.k.a., SARS-CoV-2 or COVID-19) continues to evolve, therefore, it is important for employers to keep up-to-date by checking federal, state, provincial, territorial and local government sites for the latest information on community transmission and mitigation measures that may impact the workplace.

Reducing the risk and spread of the disease is a top priority. Proactive measures, such as the ones below, may go a long way to help you prevent the spread.

- Create a pandemic plan and procedures to address communication, training and workplace practices
- Assess job specific hazards for potential exposure risk
- Provide regular communication and training to employees to keep them informed
- Establish daily screening measures (e.g., questionnaires, temperature recording at start of the day and quarantine measures for employees who have been exposed or tested positive)
- Discourage people who are ill from entering the workplace
- Promote preventive measures to reduce risk
 - Hand washing and respiratory etiquette
 - Daily cleaning and disinfecting of workspaces, common surfaces, computers and equipment
 - Wearing masks when 6-foot (2-meter) distancing is difficult to maintain
 - Maintaining a supply of masks, hand sanitizer, disinfectants, wipes, gloves, etc.
 - Posting procedures and signage at all entrances
 - Establish regular communication with employees to keep them informed
- Maintain supplies (hand sanitizer, disinfectants, wipes, masks, gloves, etc.)
- Promote physical distancing - 2 meters / 6 feet
- Improve ventilation
- Modify practices to reduce how long employees and customers are in contact with each other
 - Staggered work shifts
 - Separating workspaces and seating (6-foot/2-meter distance, plexiglass/wall partitions)
 - Teleworking, when possible
 - Virtual meetings
 - Limiting visitors to essential visits only

If you are looking for additional information to further develop your company's existing COVID-19 prevention plans, check out the following sites:

- U.S. OSHA – [Guidance for Preparing Workplaces for COVID-19](#), [Guidance on Returning to Work](#) and the [COVID-19](#) website (<https://www.osha.gov/SLTC/covid-19/>).
- Canada – [Risk Mitigation Tool for Workplaces](#) and [Coronavirus Disease \(COVID-19\)](#)
- Centers for Disease Control and Prevention - [Manufacturing Workers and Employers](#)
- World Health Organization - [Coronavirus Disease \(COVID-19\) Pandemic](#)

EPA – 2020 CDR (FORM U) REPORTING – Due November 30, 2020 *(extended date)*

Per 40 CFR Part 711, US EPA's Chemical Data Reporting (CDR) rule requires information to be submitted on manufacturing, processing and use of chemical substances on the TSCA list that were manufactured (and/or imported) over a 25,000-pound threshold at a single site. A reduced threshold of 2,500 pounds applies to a small number of chemicals subject to specific TSCA actions.

Formerly called the Inventory Update Report (IUR), the CDR report (Form U) provides key information on the use and potential exposures of chemicals that will help EPA establish priorities for TSCA risk evaluation activities. The reporting period covers substances manufactured in the United States (or imported into the United States) from 2016 – 2019 and is due **every four years**. Note: The due date for the 2020 CDR report has been extended from September 1 until November 30.

The submission must be done electronically through EPA's Central Data Exchange (CDX) reporting portal. Don't wait too long, check the portal to make sure you are registered - <https://cdx.epa.gov/> and if there are any problems send an email to helpdesk@epacdx.net . For further information and answers to common questions on the CDR rule, see EPA's [2020 Chemical Data Reporting Frequent Questions](#).

EPA – RCRA HAZARDOUS WASTE GENERATOR IMPROVEMENTS RULE AND SMALL QUANTITY GENERATOR RE-NOTIFICATION – Due September 1, 2021

The US EPA 2016 Hazardous Waste Generator Improvements Rule revised regulations on hazardous waste to make them easier to understand and provide for greater flexibility in how wastes are managed. One improvement is to allow Very Small Quantity Generators (VSQGs, formerly referred to as CESQGs) of hazardous waste (less than 220 pounds per month) and Small Quantity Generators (SQGs) of hazardous waste (between 220 and 2200 pounds per month) to retain their current generator status for an unusual event, such as a one-time clean out of hazardous waste or an act of nature that results in a the monthly limit being exceeded. The rule is being followed in 27 states (see EPA's map showing where the final rule is in effect <https://www.epa.gov/hwgenerators/where-hazardous-waste-generator-improvements-rule-effect>).

The rule updates the layout and language of the regulations making them easier to understand. It allows VSQGs to send their hazardous waste to a Large Quantity Generator (LQG) if under the control of the same person. It also requires SQGs to submit a re-notification of their generator status by **September 1, 2021** and every 4 years thereafter. Re-notification can be done by submitting EPA Form 8700-12 or by using the myRCRAid tool in EPA's RCRA information portal [RCRAInfo Industry](#). For more information on setting up a login, see [RCRAInfo Industry - Creating a User Account](#) and check with your state for their preference on how to report.

See EPA's [Fact Sheet About the Hazardous Waste Generator Improvements Final Rule](#) for further information on the rule.

CANADA ZERO PLASTIC WASTE BY 2030

Environment and Climate Change Canada (ECCC) is acting towards implementing its Zero Plastic Waste Initiative to eliminate plastic waste by 2030. The aim of the plan is to reduce pollution, increase collection and improve recycling of plastics in order to protect wildlife and waters, reduce greenhouse gas emissions, and create jobs. The first step proposed is to ban the use of single-use plastic bags, straws, stir sticks, six-pack rings, cutlery and hard-to-recycle food ware by the end of 2021. Comments from the public and stakeholders on this proposal will be accepted until December 9, 2020.

Note: Potential impacts to the composites industry are not clear at this point, so stay tuned. For further information see the recent news release ["Canada one-step closer to zero plastic waste by 2030"](#) on the ECCC website.

Ask the Compliance Expert

For questions related to the content in this bulletin, as well as any other regulatory issues, please email us at compliance.expert@compositesone.com. Or visit us at <http://www.compositesone.com/people/health-safetyenvironment/regulatory-assistance/> for more information or to submit an inquiry. We will make every effort to answer your request within 24 – 48 hours.