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	Production Procedures Safety	Effective Date: March 30, 2020
	VI - 445	Reviewed by: Dave Whitcomb
	Title: High Frequency Interaction	Approved by: Gina Facca

Purpose

This policy is to provide direction to all personnel on Vigor premises on maintaining business focus while controlling the potential of an illness outbreak to move through the Vigor business units. This is a part of the business continuity plan which will allow Vigor to continue to provide services to our customers while providing protection to our employees and their families.

These requirements apply to all personnel entering Vigor Controlled Facilities or Locations

Discussion

High frequency interaction personnel (employees or others) encounter many different personnel throughout the performance of their work. These interactions are typically brief, but will likely include distances less than six (6) feet. While Vigor will seek to limit these situations there are instances where it is necessary to perform work safely. Where possible 6-foot “social distancing” will be implemented, however due to the nature of the work it is not always possible to maintain that distance. Examples of these personnel may include facility guards, receiving personnel, pay check distribution, food service personnel, health care providers and other instances where there is a high frequency of contact with many different individuals.

Expectations

In order to mitigate the potential spread of contagions between these frequent interactions employees, Vigor is instituting the following requirements.

- Where possible establish physical barriers between these individuals and those interacting with them.
- Where possible, eliminate exchange of information via passing of paper or other items: i.e., use affixed electronic or large signage.
- Minimize time of interaction – i.e., do not fill out paperwork in presence of high frequency people, request that they step away.
- If absolutely required, only pass items **TO** those being provided services with gloved hand.
- If items must be returned, they shall be placed in a drop box and left for a period of time deemed adequate based on published life span of virus on material in question.
- Work area(s) of high frequency persons shall be cleaned and disinfected with an EPA List N germicidal cleaner at least 1x/hour; counter tops, desks, screens, touch items, etc.
- High frequency contact person shall wash or sanitize hand no less than 1x/hour.
- High frequency contact person shall wear gloves when handing material to others.

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- High frequency contact person shall evaluate other barriers and wear cloth face covering or respiratory protection as described in VI-447 Face Coverings, as a final barrier to prevent infection both directions.

Actions

There are certain work situations where you will not be able to maintain a 6-foot distance or reduce the time that you are spending with another person in the work area. In those instances, you can wear your half face respirator (you need to shave and be fit tested) with P100 pancake cartridges, or you can wear a cloth face covering with a face shield (one that attaches to your hard hat is available in the vending machines or warehouse) or you can wear an N95 mask (we have limited supply of these) with a face shield. These face coverings will help reduce the potential of exposure if there are live viruses in the area.

Here are some of scenarios that you may encounter where you can use a respirator, a cloth face covering with a face shield or an N95 mask and a face shield to help you reduce your exposure:

#1 – You are working with a co-worker in an articulated basket at height. You will be spending the next two hours in the basket working on your assignment. In this instance, at the minimum, you must wear a cloth face covering and a face shield or you must wear your respirator to control potential exposure. When you come down, wash your hands with soap and water before touching your face, eating, or going to the bathroom.

#2 – You are working in a ship and the passageways are narrow. When you look down the ladder you see several people at the bottom waiting to come up. Signal them to come up and then move away from the stairs so they can come up and pass by you with minimal contact. The same applies when you look down a passageway and seeing someone else walking toward you. Wait to enter the passageway in a side passage so that contact is kept to a minimum. If you are working in close quarters, your respirator or a cloth face covering with a face shield must be worn to limit your exposure.

#3 – Your craft is closely following another craft working in an enclosed space. Since all spaces can't be cleaned following each person who leaves it, you must wear your respirator, and/or a face shield with a cloth face covering plus gloves to limit your potential exposure to frequently touched surfaces.

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#4 – You are part of a team packing shipping boxes with customer parts. The parts are heavy and it takes two people to move the parts into place. Wearing a cloth face covering and a face shield and/or your respirator is required to limit your exposure.

If your task assignment requires the use of a respirator to protect your health (hot work, blasting, painting, etc.) then you can wear that respirator with P100 pancake filters with confidence that your health will be protected from the coronavirus as well.

If your task requires you to be in a close work area with multiple people in order to accomplish the assignment AND you are not painting, blasting or doing hot work, the recommended technique for limiting your potential exposure is wearing a face shield in addition to wearing a cloth face covering.

Supervisors are responsible to ensure personnel maintain social distances while at the workplace. Compliance with social distancing guidelines is mandatory (no different than any other key safety requirement) – social distancing applies to all personnel on Vigor properties at all times. Our Ops Management and the Safety Team will proactively engage with monitoring compliance with these requirements and provide immediate corrective coaching and notification to supervision.