

Commenter: Petrina Jones Wroblewski, Columbia Gas of Virginia

Comments on Proposed Emergency Temporary Standard/Emergency Regulation Relative to COVID-19

On behalf of Columbia Gas of Virginia, Inc., we request your consideration of the following recommendations to the proposed Emergency Temporary Standard/Emergency Regulation, Infectious Disease Prevention, SARS-CoV-2 Virus That Causes COVID-19. Columbia Gas of Virginia, Inc., a natural gas utility, serves over 275, 000 residential, commercial and industrial customers across the Commonwealth of Virginia and employs over 450 employees. Columbia Gas of Virginia operates seven local offices in Buena Vista, Chester, Fredericksburg, Lynchburg, Staunton, Suffolk and Warrenton.

Columbia Gas of Virginia, Inc.

COMMENTS

Emergency Temporary Standard/Emergency Regulation, Infectious Disease Prevention, SARS-CoV-2 Virus That Causes COVID-19

Columbia Gas of Virginia, Inc. ("Columbia") is a party interested in the promulgation of the referenced Emergency Temporary Standard/Emergency Regulation and offers the following as public comment:

1. Section 40 Mandatory requirements for all employers:
 - A. Section 40 (F) provides, in pertinent part, that "where the nature of an employee's work or the work area does not allow them to observe physical distancing requirements, employers shall ensure compliance with respiratory protection and personal protective equipment standards applicable to its industry..."

This Section recognizes what is commonplace in the gas utility industry, that it is not always possible or practicable to maintain physical distancing requirements; however,

- B. Section 30 "Definitions" on p. 12; #5 promulgates that "employee use of face coverings for close contact (inside six feet of) with coworkers, customers, or other persons is not an acceptable administrative or work practice control to achieve minimal occupational contact"

Sections 30 and 40 quoted above appear to conflict; as such Columbia urges DOLI to adopt the standard at Section 40(F) and align the provisions of Section 30 and any other similar provisions with Section 40(F).

2. Section 40 Mandatory requirements for all employers:
 - A. Sections 40 A (6), (7) and (8) address issues of employee protection when exposed to or having contracted COVID-19. It is noteworthy that these standards differ from CDC guidance on these topics. Columbia currently meets these proposed standards as well as CDC standards; however, Columbia urges DOLI to align all of Section 40(A) to CDC guidance for ease of administration and compliance.
3. Section 60 Requirements for hazards or job tasks classified as "medium" exposure risk:
 - A. Columbia seeks to clarify that the provisions of Section 60(A) apply to the installation of air-handling systems (prospective installation) and are not a requirement to retrofit existing systems, which could only be done at an extraordinary cost, require considerable time to complete, and present an undue hardship to employers.