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**Purpose**

The Niagara Falls Water Board (NFWB) has operations that must be performed, or rapidly and efficiently resumed, in a declared public health emergency. While the impact of an emergency cannot be predicted, planning for operations under such conditions can mitigate the impact of the emergency on our people, our facilities, and our mission.

This plan for declared public emergency is designed to ensure that essential operations can be performed during a pandemic as required by Labor Law Section 27-c. These operations are the foundation upon which the plan is built, and it is an important resource in providing essential services to our customers during an emergency.


This plan will be updated periodically as required to incorporate new directives/strategies, new information technology, legislative changes, and procedural changes based on lessons learned and best practices identified during exercises and actual events. A full review, update, and approval of the plan will be conducted annually.

No content of this plan is intended to impede, infringe, diminish, or impair the rights of us or our valued employees under any law, rule, regulation, or collectively negotiated agreement, or the rights and benefits which accrue to employees through collective bargaining agreements, or otherwise diminish the integrity of the existing collective bargaining relationship. The NFWB will reserve the right to act unilaterally during a public health emergency to take such actions as a required to respond to an emergency situation and thereafter providing notice and/or negotiating with represented employees as required, but such unilateral emergency action will not be implemented except as may be required to respond to an imminent and bona fide emergency situation.

**Scope**


This Declared Public Health Emergency Plan includes the following:

- List and description of positions considered essential.
- Descriptions of protocols to follow to enable all non-essential employees to work remotely.
- Description of how the NFWB would stagger work shifts to reduce overcrowding.
- Protocols for PPE.
- Protocol for when an employee is exposed to disease.
- Protocol for documenting hours and work locations for essential workers.

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- Protocol for working with essential employees' localities for identifying emergency housing if needed.
- Any other requirement determined by the New York State Department of Health, such as testing and contact tracing.

This Plan also describes the NFWB protocols for basic infection prevention including respiratory and hand hygiene, social distancing, and general health screening. The plan is based on the currently best-known public health practices provided by the CDC, and NYS Department of Health.

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**Definitions**

Personal protective equipment - all equipment worn to minimize exposure to hazards, including gloves, masks, face shields, foot and eye protection, protective hearing devices, respirators, hard hats, and disposable gowns and aprons.

Public employer or employer - the state of New York, a county, city, town, village or any other political subdivision or civil division of the state, a public authority, commission or public benefit corporation, or any other public corporation, agency, instrumentality, or unit of government which exercises governmental power under the laws of this state, provided, however, that this subdivision shall not include any employer as defined in section twenty-eight hundred one-a of the education law.

Contractor - individual performing services as party to a contract awarded by the state of New York or any other public employer defined in paragraph b of this subdivision.

Essential - a designation made that a public employee or contractor is required to be physically present at a work site to perform his or her job.


Non-essential - a designation made that a public employee or contractor is not required to be physically present at a work site to perform his or her job.

Communicable disease - an illness caused by an infectious agent or its toxins that occurs through the direct or indirect transmission of the infectious agent or its products from an infected individual or via an animal, vector, or the inanimate environment to a susceptible animal or human host.

Retaliatory action - shall mean the discharge, suspension, demotion, penalization, or discrimination against any employee, or other adverse employment action taken against an employee in the terms and conditions of employment.

Disinfection – The process of killing (inactivating) harmful and objectionable bacteria, cysts and other microorganisms (pathogenic) by various agents such as chemicals, heat, ultraviolet light, ultrasonic waves, or radiation. Disinfection is usually considered a 99+% kill compared to sterilization that generally attains 100% kill.

Cleaning - usually refers to removing something unwanted: you clean your hands by washing them, then you can clean some grapes. This word has many meanings related to being pure or empty.


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**Personnel Plan**

At the height of a declared public health emergency (pandemic), absenteeism is much greater than normal. It is suggested that plans assume 40-50% of total staff are impacted. As such, delegations of authority are critical. The NFWB shall plan for delegations of authority that are at least three deep per responsibility to help assure continuity of operations over an extended period, i.e., 30-60-90 days. The organizational chart posted to the NFWB website shall serve as reference for such delegations of authority and shall be updated as needed.

**Essential Functions**

Priority	Essential Function
1	Water Treatment
2	Pumping & Storage
2	Distribution System Water Testing
3	Distribution System Repairs
3	Equipment Maintenance
4	Procurement, fiscal management, billing
4	Customer communication

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**Essential and Non-Essential Departments**

Department	Work Shift	Essential / Non-Essential	Remote Work Possible Yes/No	Rotating Schedule Possible Yes/No
<b>Water Treatment Plant</b>				
Laboratory	0700 - 1500	Essential	No	Yes
Operations	24/7	Essential	No	Yes
Maintenance/Trades	0700 – 1500	Essential	No	Yes
Meter Maintenance	0600 – 1500	Essential	No	Yes
Administrative	0800 – 1600	Essential*	Yes	Yes
Engineering	0700 – 1600	Essential*	Yes	Yes
IT	0700 - 1500	Essential*	Yes	Yes
<b>Wastewater Treatment Plant</b>				
Laboratory	0700 – 1600	Essential	No	Yes
Administrative	0700 – 1500	Essential*	Yes	Yes
Inside Maint.	0700 – 1500	Essential	No	Yes
Operations	24/7	Essential	No	Yes
Enforcement	0700 – 1500	Essential	No	Yes
Security	0700 – 1600	Essential	No	Yes
Outside Maint	Varies	Essential	No	Yes


\*Occasional on-site work is believed to be necessary for all positions to support mission-critical work, but these positions may be considered non-essential for tasks that can be completed by remote work.

**Physical Distancing**

NFWB employees shall maintain at least 6 feet distance between one another as much as practicable. Any time personnel are less than 6 feet apart or in a common area (hallway, break room, elevator, bathroom, etc.), they must wear a face covering. All NFWB personnel are required to carry a face covering on their person in the event that another individual unexpectedly comes within 6 feet.

**Occupancy Limits**

Chairs have been removed from conference rooms, break rooms and lunchrooms to reduce density and to discourage congregating. Occupancy limits are posted at the entrances to common rooms and elevators. Tight or “smaller” spaces shall be occupied by only one individual at a time, unless all occupants are wearing face coverings. If the space must be

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occupied by more than one person to maintain uninterrupted operations, occupancy must be kept at 50% of maximum capacity or less.

Common situations that may not allow for 6 ft. of distance between individuals include traveling through narrow process area aisles, stairwells and elevators. Face coverings are required by employees traveling through these common areas until they reach their work location. If 6 feet distance from another individual cannot be maintained at the work location, the employee must continue to wear their face covering. Work areas that are smaller in size and that likely will require a face covering when two or more employees are present include:

**WTP**

- Generator Room
- Sludge Building
- Clear Well Vent-House

**WWTP**


- Main Wet Well
- Bar Screen
- Pump Gallery
- Polymer Room
- Sludge Thickener Pump Area
- Effluent Building

Additionally, C&D team tasks typically require two or more employees to complete, particularly during an excavation. These employees must wear a face covering while working in the excavation in addition to their standard PPE (i.e., hard hat, safety glasses, hi-vis apparel). Additionally, no more than four employees will be permitted to work simultaneously in these areas unless absolutely necessary for uninterrupted operation.

The Supervisor, Crew Leader and EHS Specialist will periodically inspect work locations to ensure adherence to the face covering and occupancy policies. Furthermore, employees are required to thoroughly wash hands with soap and water or must use hand sanitizer upon job completion.

**Cross Training**

The NFWB will develop a plan to cross-train employees in advance of declared public health emergency (pandemic) so that back-up workers are available for essential functions. Employees in non-essential and essential positions should be trained to perform essential tasks that normally are performed by other workers. Discussions should be held with unions and human resource departments to prepare for these situations.

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**Alternate Work Schedules**


Regular work schedules may be modified in the event of a pandemic. Departments should review normal work schedules and determine how they can be modified to promote social distancing and continuity of operations. Where schedule modifications impact represented employees, these will be negotiated with employees’ collective bargaining representatives prior to their implementation unless unilateral action is required in the face of an emergency, in which case notice and an opportunity to bargain will be provided as soon as practicable under the emergency circumstances. During pandemics, overtime is probable, but meal and rest periods will still be required. Over working employees, or working in hazardous conditions, can worsen the situation – maintain the high levels of safety possible.

If staggering shifts is required, the following guidelines will be used:

- Splitting staff into teams with alternate days working from home (if applicable) or splitting across a day and night shift.
- As far as possible, where staff are split into teams, fixing these splits (cohorting), so that where contact is unavoidable, this happens between the same individuals.
- Spreading out standard processes, so that only one team needs to be on the premises to complete a task at a given time.
- Where it is possible to remain 6 feet apart, using signage such as floor markings to facilitate compliance, particularly in the most crowded areas. This includes entry points to buildings, toilets, and communal break areas where queues may form.
- Stagger breaks and lunch breaks
- Avoid the use of hot-desking where possible to reduce the risk of infection
- Position workers facing away from each other where possible, again to reduce the risk of infection.

**Telecommuting Policy**

Telework, aka Telecommuting can be an integral part of plans and procedures to maintain essential functions and services in a pandemic. NFWB has implemented remote-access capabilities for the employees identified above as capable of performing remote work (i.e. AnyDesk) and the capabilities of the Verizon desk phones to send voicemail messages to email has been enabled. IT will continue to analyze capabilities for teleworking and will provide necessary instructions for personnel who can perform essential functions by teleworking during a pandemic (see Essential and Non-Essential Departments above). The IT Department will develop and evaluate telework plans, procedures, and capabilities through reviews, testing, post-incident reports, lessons learned, performance evaluations, and exercises. Procedures

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shall be established to ensure that corrective action is taken on any deficiency identified in the evaluation process.

On-site employees will continue to use the time clock system, with markings on the floor near the clock to assist in maintaining social distancing. Remote workers' hours will be tracked through electronically submitted time sheets in a format acceptable to supervisors and management, or through an agreement by the employee at issue to maintain their normal hours and to document time off via email to the supervisor. Verification of employee working status may be completed through phone calls, e-mail check ins, or other reasonable means.

**Personal Protective Equipment and Supplies to Stock**

The EHS Specialist will ensure that there is an adequate and stable supply of required PPE that includes, but is not limited to masks, respirators, gloves, safety glasses, face shields and goggles. The EHS Specialist also will ensure the proper use and maintenance of PPE through documented employee training and by field auditing.


In addition to supplying the required PPE for relevant work tasks, the NFWB will provide face coverings to all NFWB employees at no cost to the employee. We will continuously maintain a minimum of 575 face coverings onsite so that each of 115 employees will have a minimum of 5 masks each. The EHS Specialist maintains the stock of PPE and tracks distribution and procurement.

Each employee is responsible for the maintenance and care of their face coverings and other PPE (1/2-face respirators, gloves) that is issued to them. Employees must attend training specific to the care and maintenance and proper donning/doffing of PPE (training class attendance is recorded and maintained by EHS Specialist). NFWB employees in need of additional PPE will communicate their need(s) to the EHS Specialist or to their Supervisor so that the proper PPE can be obtained and distributed.

**Basic Hygiene**

The NFWB will provide a work environment that promotes personal hygiene. Hand soap, alcohol-based (at least 60%) hand sanitizer, disinfecting wipes and disposable paper towels will be provided to reduce the transmission and risk of employee exposure to COVID-19 and other respiratory viruses. All employees are required to implement the following good hygiene and infection control practices:



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- Frequently and thoroughly wash your hands with soap and water for at least 20 seconds; if soap and running water are not immediately available, use an alcohol-based hand sanitizer (containing at least 60% alcohol).
- Practice respiratory etiquette, including coughing or sneezing into the crook of your arm, or covering your cough or sneeze with a tissue and then throwing the tissue in the trash (followed by thoroughly washing your hands).
- Avoid touching your eyes, nose, and mouth.
- Clean and disinfect frequently touched objects and surfaces such as your keyboard, mouse, phone, office door handle, light switches, etc. and other elements of your work environment.


Each employee and each work truck are provided with a personal 2-oz bottle of hand sanitizer that can be refilled when necessary by the Maintenance Manager, Supervisor or by the EHS Specialist. Wall-mounted hand sanitizer stations are installed in the WWTP (control room entrance, maintenance, lab lunchroom entrance and C&D Team garage). Additionally, sanitizing wipes and sprays are located throughout NFWB facilities:

<b>WTP</b>	<b>WWTP</b>	<b>C&amp;D Garage</b>
customer service lobby	administrative building	main office
lunchroom	lunchroom	lunchroom
conference room	conference room	
control room	control room	
maintenance office	maintenance office	
meter shop		

Signs promoting frequent and proper hand washing with soap and water are posted on bulletin boards and restrooms throughout the NFWB facilities.

### **Disinfection & Cleaning**

The Maintenance Manager will direct the Cleaning/Disinfection Team to ensure adherence to our routine of daily or more frequent cleaning and disinfection of high transit areas, restrooms, common areas, handrails, and other “high-touch” areas. The Maintenance Manager or his designee will ensure that an adequate and stable supply of required disinfectants (hand sanitizer, sanitizing wipes, disinfectant sprays), cleaning supplies (hand soap, detergent, floor and bathroom cleaners, etc.) and paper products (toilet tissue, paper towels) are available. Cleaning and disinfectant supplies will be obtained from established vendors (i.e., Lawson, Morgan, Grainger, others) and the products used (i.e., HUSKY 814) will be EPA-approved and contain a statement of effectiveness against COVID-19 (or the pandemic disease then present). Safety Data Sheets and statements of effectiveness are maintained by the EHS Specialist and

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are provided in common areas for employee general knowledge in accordance with the NFWB Written Hazard Communication Plan (EHS-4).

The Maintenance Manager will maintain cleaning/disinfection logs for NFWB facilities through detailed cleaning PMs (planned maintenance) work orders that will be tracked using Lucity (NFWB computerized maintenance management system).

**Emergency Housing**

The NFWB has shower and basic kitchen facilities and has purchased cots and bedding materials to facilitate on-site temporary housing/shelter in place by operations and maintenance staff in the event such measures are determined to be necessary to contain the spread of disease.

**Limit Public Access, Travel Restrictions and Social Distancing**

Limit or prohibit customers from interacting with employees as much as possible. Require bill payment to occur through mail, electronic means or through a drop box. Educate staff about *Social Distancing*, a measure to increase the space between people and decrease the frequency of contact among people. Travel will be restricted or eliminated according to local plans for alert levels.


**Restricted Access**

**NFWB Employees** - Entrance to control rooms in each facility is restricted to allow only authorized personnel (i.e. operators and those having a legitimate business need). Additionally, the WTP courtyard entrance (south wall) leading to the WTP control room should be used only by WTP operations staff.

**Customers and Visitors** - The public is encouraged to conduct business with the NFWB via phone call and to make an appointment to visit onsite only if necessary (instructions are posted on the main entrance door to the WTP). If needing to come onsite, the individual must be questioned/screened regarding their health and their contact with others known to be infected. Visitors and customers must wear a face covering while occupying the WTP common reception areas.

A sign-in log is kept in the main lobby at the customer service table which is separated from the customer service receptionist/representative by an acrylic partition. Customer service ensures that visitors sign-in; the Operator on duty and the Maintenance Manager ensure that contractors sign in.

Contractors and visitors at the WWTP are questioned/screened by security regarding their health and their contact with others known to be infected. Security ensures that

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the visitor or contractor has a face covering available prior to permitting entry through the gate. While inside our buildings, visitors and contractors must wear a face covering in our common administrative areas unless attending a meeting in our conference room and a minimum of 6 feet can be maintained from another individual.

A sign-in log is kept in the East Gate main entrance security guard house. Visitors and contractors must have valid business to be permitted entrance to the facility by the Security Guard on duty, or by the Shift Operations Supervisor (SOS) after hours. The log will be maintained by Security (archived logs are maintained by the EHS Specialist).


**Considerations for Remote Workers – Working in Public  
(C&D Team, Meter Shop, Industrial Monitoring, X-Connection Inspector)**

NFWB employees must avoid entering private residences as much as feasible. If the service is necessary to ensure that the rate-payer is compliant, the following process will be followed:

Prior to responding to a service call, customer service will screen the individual(s) that is seeking assistance by inquiring:

- Are you or any occupants in the dwelling currently ill or experiencing symptoms associated with COVID-19?
- Have you or any occupants in the dwelling experienced COVID-19 symptoms in the past 14 days?
- Have you or any occupants in the dwelling traveled (domestically or internationally) within the past 14 days?
- Have you or any occupants in the dwelling tested positive for COVID-19 in the past 14 days? and
- Have you or any occupants in the dwelling had close contact with someone confirmed to be or suspected of being infected with COVID-19 in the past 14 days?

NFWB employees will not enter residences if there is a positive response to any of the above questions. The service must be rescheduled to a later date. Responses will be documented by customer service. **This script will be revised based on information known about the then-current pandemic.**

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The employee(s) must ask the same questions (above) when arriving at a residence to ensure that conditions have not changed. The service will be rescheduled if a positive response is given to any of the above questions.

Should employees need to enter a residence, the employees must maintain 6 feet social distance as much as possible. Regardless of social distance, the **mandatory minimum PPE for entering residences** is:

- Face Covering (or N-95 or KN-95 respirator if available)
- Nitrile gloves
- Safety Glasses

For C&D Team tasks, social distance cannot typically be maintained. Therefore C&D Team employees must wear a face covering in public during these instances.

**Disinfection Response to Positive Pandemic Disease Case and Leave:**


If an NFWB employee tests positive for COVID-19 or a future pandemic disease, the following cleaning & disinfection protocol will be followed:

The areas known to be contaminated will be cordoned off to restrict access. Doors and windows will be opened to increase ventilation to the extent feasible. We will wait approximately 24 hours (if possible) prior to sending in our cleaning & disinfection team that will spray Husky 814 (or another Husky brand product effective against the current pandemic disease) throughout the areas. At the Maintenance Manager’s discretion, we will contact one of our established vendors (Ozone Prime, ServPro) for professional deep cleaning.

All NFWB full-time employees are provided with paid sick leave in addition to vacation or other paid leave, and FMLA leave may be available for circumstances where extended leave is required. During a public health emergency, policies prohibiting taking time off when an employee has exhausted accruals will be waived on a case-by-case basis where necessary, including where an employee exhibits symptoms or where otherwise necessary to prevent the spread of communicable disease in the workplace. HR staff will be kept informed of special emergency leave provisions from the State or Federal governments (such as the FFCRA and NYS Paid COVID Leave that were enacted during the COVID-19 pandemic).

**Communication**

If an NFWB employee tests positive for COVID-19 or a future communicable disease during a declared pandemic, we must immediately notify the Niagara County Department of Health and cooperate with contact tracing efforts, including notification of potential contacts such as workers or visitors who had close contact with the individual, while maintaining confidentiality required by state and federal law and regulations. Where it is not possible to interview the individual involved regarding potential close contacts, information on potential close contacts

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will be gathered from supervisors or co-workers. Reference can be made to time clock “punches” to determine workers on site at the same time as infected employees.

General Counsel or his designee will be responsible for providing notification to the Niagara County Department of Health, and to the NYS DOH if directed to do so. Close contacts of the infected employee will be informed that they may have been exposed to COVID-19 (or another pandemic disease) by the Deputy Director of Administrative Services or his designee upon instruction by the Niagara County Department of Health contact tracers as appropriate.

**REFERENCES**

Center for Disease Control (CDC) COVID-19 Response, [www.cdc.gov](http://www.cdc.gov)

NYS Department of Health (NYSDOH) *Reopening NY, Guidance for Office-Based Work During the COVID-19 Public Health Emergency*, May 28, 2020

USDOL OSHA *Guidance on Preparing Workplaces for COVID-19*, OSHA 3990-03 2020

**RESOURCES**

Resource A [COVID-19 Health Screening Self-Assessment and Entry Survey](#)

Resource B [Return to Work after COVID-19 Illness](#)

Resource C [Proper Donning/Doffing Respirator or Mask](#)