## Mask Ordinance Action Plan

Regarding Ordinance 187134 Sec. 187134 (b) on the use of masks “except where it would be physically hazardous to do so due to the type of work performed.”; I re-read the LADWP’s Injury Illness and Prevention Plan (October 30, 201 version) on the identification of hazards.

There are three forms that exist to identify and begin the analysis and corrective process for a job-site hazard:

* Safety Inspection Checklist
* Safety Inspection Action Item Log Form
* Jobsite Hazard Analysis

If we mass-report (using one or more of these forms) the existence of hazardous conditions using a mask (i.e. CO2 concentrations of 5000 PPM and/or O2 below 19.5%) to our supervisors or managers, that will (1) show solidarity; and, (2) create a huge bureaucratic burden. Both will allow us to use our power as workers to influence management for the benefit of the health and safety of our fellow employees and the public.

Is there a recommended form to start with? Is there a recommendation as to whom to submit a form, or a written safety concern to? Is there a recommendation regarding the viability of this idea?

## Discussion

Masks do not stop aerosolized transmissible diseases. Engineering controls (dispersal and destruction) work best; followed by half- and full-face respirators.

If a mask is sealed up enough to make a difference stopping an aerosolized virus, it becomes a hazardous environment – less than 19.5% Oxygen and/or CO2 concentrations at or above 5000 PPM.

The above can be argued in court – which is expensive, and slow.

The department’s Injury and Illness Prevention Program provides a pathway to raise a concern regarding the hazardous conditions created by masks fitted to reduce exposure to COVID-19. First, there is a “**safety inspection checklist**” supervisors and managers use in scheduled inspections; next, a “**Safety Inspection Action Item Log Form**” for each action item identified by a supervisor or brought to that supervisors attention; after that, a **Job Hazard Analysis** form is completed to begin the analysis and potential corrective action for an identified hazard.

## Reference

### Los Angeles Ordinance 187134

Sec. 4.703. Other Requirements

(b) **Masks and Physical Distancing** Employees who are unvaccinated, partially vaccinated, or have an unreported status for any reason shall, in compliance with City standards and nothwithstanding public policy guidelines, continue to wear masks and adhere to physical distancing protocols while present at any City worksite or facility or interacting with members of the public, *except where it would be physically hazardous to do so due to the type of work performed.*

### Power System Injury and Illness Prevention Program (IIPP) dated October 30, 2017, Section 4 (“System for identifying and evaluating hazards”), Subsection 4.1 (“Identification”).

“Managers and supervisors have ultimate responsibility to ensure that workplace hazards are identified and corrected.”

[…]

“Scheduled Inspections

“Scheduled inspections […] using the attached **general health and safety inspection checklist or other checklist approved by System Safety**.”

[…]

“Action items […] shall be documented on a **Safety Inspection Action Item Log Form”** which shall be submitted to their respective manager within five (5) working days of the inspection. System/Division Safety offices may authorize substitute forms that provide the necessary information.”

### Power System Injury and Illness Prevention Program (IIPP) dated October 30, 2017, Section 4 (“System for identifying and evaluating hazards”), Subsection 4.2 (“Evaluation”).

“**Job Hazard Analysis (JHA) Development**

JHA forms shall be developed for all equipment and specific work taks/operations that present safety hazards or concerns.

Managers and supervisors are responsible for ensuring JHA forms are developed for work task/operational hazards to which employees under their direction may be exposed. Managers and supervisors may call upon employees familiar with equipment and work tasks/processes to participate in completing JHAs.”