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COVID-19 GUIDELINES FOR PORTABLE SANITATION



A MESSAGE FROM THE PSAI



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The Coronavirus-19 (COVID-19) pandemic has ushered in increased vigilance and care while the world works together to prevent and contain the virus.

As an essential industry during the pandemic, portable sanitation providers have been on the front lines every day. Our service personnel have worked tirelessly to ensure that each customer and job site receives the best resources we can offer during times in which critical supplies are short and need is great.

Although the pandemic is still affecting most areas, general precautions for preventing the spread of COVID-19 vary by region. It is likely these requirements will continue to evolve over the coming months as conditions change and the virus mutates.

Whatever is true where you live, work, or enjoy recreation, the Portable Sanitation Association International (PSAI) hopes that you have access to sanitation resources that help keep you safe. To that end, we offer the following guidance for portable sanitation during the time of COVID-19. It is our belief that until there is a widely accessible, reliable method of preventing this illness, these guidelines should be observed by everyone responsible for providing nonsewered sanitation services.

As COVID-19 circumstances continue to evolve, so will public health and safety recommendations and requirements. Because of this, our guidance will be updated periodically. Readers with questions are invited to contact the PSAI for more information.



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Disclaimer

Please be advised that some or all of the information contained in this document may not be applicable to some worksites and recreation areas. It also may lack information necessary for others.

Employers are ultimately responsible for ensuring that they are providing sanitation services in a manner that is consistent with the General Duty Clause of the Occupational Safety and Health Administration (OSHA) and any other applicable laws, rules, or guidance that may apply to their specific situation or geographical area. Event planners, government contractors and customers are similarly responsible for taking whatever steps are necessary to protect and preserve the health of portable sanitation users. The PSAI strongly advises that before implementing any of the practices and procedures contained herein, you carefully evaluate all of the information and consult with your own legal counsel and other advisors regarding the legality, applicability and potential efficacy for your needs. You will also want to determine whether other recommendations or requirements may apply.

Guidance for Work Sites

For decades portable sanitation on job sites had been underpinned by standards published by OSHA and by ANSI/PSAI Z4.3 covering nonsewered waste disposal systems.¹

Beginning in the late winter of 2020, various agencies and associations began issuing guidance on preventing the spread of COVID-19. On May 19, the US Centers for Disease Control (CDC) issued new guidance specifically for construction workers. This information focuses on how job site personnel and their employers can protect themselves and slow the spread of COVID-19.² Our growing body of knowledge about steps that are necessary to control the virus, taken together with the requirements of OSHA’s General Duty Clause that employers must “furnish...employment and a place of employment which are free from recognized hazards that are causing or are likely to cause death or serious physical harm to his employees,”³ have led to the following guidance for job sites.

Because it is unlikely that COVID-19 will ever be completely eradicated, there is no indication that a return to pre-COVID-19 conditions on job sites will be allowed even if a preventative vaccine is introduced. Consequently, leaders responsible for procuring portable sanitation and maintaining it on job sites should familiarize themselves with the guidance that follows and implement it for the foreseeable future.



OSHA/CDC REQUIREMENTS	GUIDANCE FOR JOB SITE LEADERS REGARDING PORTABLE SANITATION
<p>Limit close contact with others by maintaining a distance of at least 6 feet, when possible.</p>	<ul style="list-style-type: none"> • Ensure enough portable restroom units are on site so that lines do not form during breaks. • In no case should fewer units be present than the ANSI/PSAI Z4.3-2016 standard of 1 unit per 10 workers for a 40-hour work week. • When portable sanitation service technicians visit job sites, they will be wearing masks and face shields among other personal protective equipment (PPE). These will be left on while interacting within 6 feet of workers on the job site.
<p>Portable toilets should be cleaned and disinfected periodically through the shift, as well as at the beginning and end of every shift.</p>	<ul style="list-style-type: none"> • Toilets should be pumped no less than twice per week.⁴ • Talk with your portable sanitation provider about the need for frequent disinfection of the toilets and the products that are effective against COVID-19 according to CDC and the Environmental Protection Agency (EPA).⁵ • Be sure to document in the service agreement or some other formal manner: (1) how often your portable sanitation provider will be on your site to provide service, (2) what cleaning products they will use, (3) whether they will leave products with you so that ongoing cleaning can occur between their visits to your site between services, and (4) how the cleaning will be documented.
<p>Employers should have a COVID-19 response plan to protect workers</p>	<p>Ask to review your portable sanitation provider’s plan and discuss how it will affect service to your site.</p> <p>Similarly, educate your provider about the provisions of your company’s COVID-19 response plan so that your service technician can be informed about any special needs or concerns on the job site.</p>

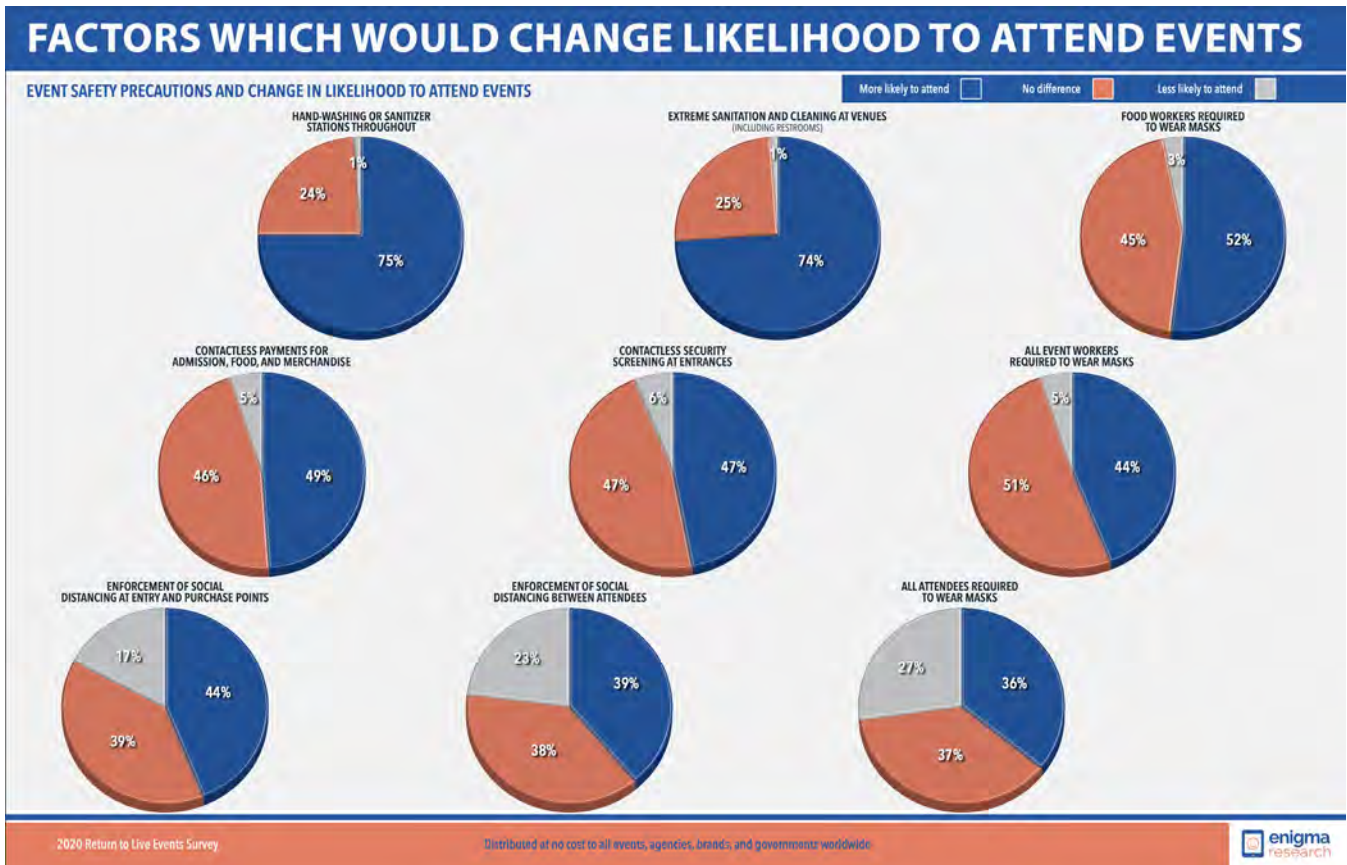
OSHA/CDC REQUIREMENTS	GUIDANCE FOR JOB SITE LEADERS REGARDING PORTABLE SANITATION
<p>Employers should provide employees with access to soap, clean running water, and materials for drying their hands, or if soap and water are not readily available provide alcohol-based hand sanitizers containing at least 60% alcohol at stations around the establishment for use by both workers and customers.</p> <ul style="list-style-type: none"> Facilities must support soap and water washes of at least 20 seconds multiple times a day or a similar number of uses of alcohol-based sanitizer containing at least 60% alcohol Place handwashing stations and/or hand sanitizers in multiple locations (including in or adjacent to portable restrooms) to encourage hand hygiene. Depending on the size or configuration of the job site, there may need to be multiple handwashing stations available to accommodate the workforce while maintaining social distancing, and stations may need to be restocked during the course of the day to maintain adequate handwashing supplies. 	<p>The PSAI believes changes in handwashing expectations and minimum standards are here to stay. In order to accommodate these changes you should:</p> <ul style="list-style-type: none"> Make sure you have enough hand wash facilities on your job site at all times. At a minimum, the PSAI suggests you assume each employee will need at least three washes per day and possibly more. This includes 1-2 times after using the toilet, once before a meal, and once at the end of the shift. Talk with your employees and assess how many washes per employee per day above three are likely, but don't let them assume fewer than three. <p>If you doubt people will wash their hands three times a day, update your training and procedures to ensure they wash after toileting and before eating. CDC recommends additional washes if hands are soiled, have been sneezed/coughed in, or if gloves have been changed.</p> <ul style="list-style-type: none"> Note that portable handwash equipment varies in its capacity, so discuss the total number of washes or sanitizations each piece of equipment will provide. Note that hand sanitizer will kill COVID-19 if it contains at least 60% alcohol, but it is not as effective as a cleaning agent. If your employees have dirty hands, you will need hand wash stations instead of or in addition to sanitizer. Discuss the layout of the job site and the placement of the hand wash or sanitizer stations. Also discuss how they will be stocked and sanitized between services from your provider, who will provide the supplies/cleaners, and how cleaning will be documented.
<p>If proper hand wash stations cannot be obtained, employers are advised to "Provide a large (5+ gallon) bucket with a lid and tap that can be used to provide water for handwashing. If this method is used, the water tap should be regularly cleaned and disinfected, and the contaminated wastewater must be collected and treated in accordance with local laws and environmental regulations. Provide fresh clean water daily.</p>	<p>The CDC actually provides this guidance because so many job sites are having trouble getting enough hand wash facilities. How can your portable sanitation provider help?</p> <p>Even though your provider may be short of proper hand wash stations, ask about other options they can provide that are at least as good as the "large bucket" option CDC allows. Remember, they do this for a living and will be glad to help you problem-solve until the production of hand wash units catches up with demand.</p>

Even though the new CDC/OSHA guidance does not have the force of law in the same manner that a regulation or statute does, it should be heeded at all job sites going forward—as should the recommendations in the Occupational Safety and Health Administration (OSHA) Guidance on Preparing Workplaces for COVID-19.⁶

Following CDC and OSHA guidance will improve the safety of your workers and reduce the transmission of COVID-19. It will also insulate you from the consequences of failing to implement these important changes. If you don't implement these things, you risk dissatisfaction from workers and/or their unions on the job site, increased worker's comp claims, as well as civil actions from workers and their families who get sick. Your portable sanitation professional is ready to help. Ask for assistance in these matters; it will help you in more ways than one.

Guidance for Events

Whether you are planning an event for fifty people or thousands, things will definitely be different than they were before COVID-19 was a fact of life. While some people may not worry much about catching or spreading the virus, many are rightly concerned about that. They will make decisions about whether to attend your event and how long to stay based on the quality and availability of the sanitation you provide. In a report published by Enigma Research titled “2020 Return to Live Events Survey: What Will Attendees Expect?” data showed that the two factors that would make attendees most likely to return to events are the presence of hand washing or sanitizer stations throughout the venue and “extreme” sanitation and cleaning at events at venues, including restrooms.⁷



So it just makes good sense on many levels to ensure that your event site is properly outfitted with enough portable sanitation and hand washing facilities, in the right locations and with the right amount of cleaning, to keep everyone safe and feeling confident that you are committed to ensuring their event experience does not unnecessarily expose them to COVID-19. The following guidance is based on information from the CDC and the PSAI’s previously published standards for events.^{8,9}



CDC REQUIREMENTS/PSAI STANDARD	GUIDANCE FOR EVENT PLANNERS
<p>Require frequent employee and attendee handwashing (e.g., before, during, and after taking tickets; after touching garbage) with soap and water for at least 20 seconds and increase monitoring to ensure adherence.</p>	<ul style="list-style-type: none"> • Make sure you have enough hand wash facilities on your event site at all times. You will need them while your team is setting up the event, during the event, and afterward while the event is being torn down. • At a minimum, the PSAI suggests you assume each employee will need at least 6 washes per day and possibly more. This includes once on arrival, 1-2 times after using the toilet, once before a meal, and once at the end of the shift, and 1-2 times throughout the shift after engaging in activities that increase exposure. • Assume attendees will need hand washing at least 3 times in a 2-3-hour visit: once on arrival, once when eating or toileting, and once when they exit. • Discuss the capacity of each hand wash station with your portable sanitation provider. While all equipment varies, and some users may run more water than others, a good rule of thumb for a hand wash station is about 300 washes.
<p>Supplement hand wash stations with hand sanitizer when sinks with running water are not available. Ensure the sanitizer being used contains at least 60% alcohol.</p>	<ul style="list-style-type: none"> • Hand sanitizer is a good substitute for killing the COVID-19 virus. Note, though, that it does not actually clean the hands. Consequently, sinks with running water are a better choice if they are available.
<p>Make sure you have an adequate number of toilets and hand wash units, properly supplied with soap, water, hand sanitizer containing at least 60 percent alcohol, paper towels, tissues, disinfectant wipes, and no-touch trash cans, placed throughout the venue to encourage frequent use and discourage congregating in lines where COVID-19 is more likely to be spread. Distances of at least 6 feet between people should be possible when lines form.</p>	<ul style="list-style-type: none"> • Hand wash stations should be placed, at a minimum, at the points of entry and departure to your event, as well as near restrooms and food venues. • Ensure that you have adequate no-touch trash receptacles near all hand wash stations and toilets. • When considering the number toilets to get, think about capacity (roughly 200 uses per toilet), placement, and lines. You will need enough units, spaced far enough apart, to keep lines and close congregating to a minimum.
<p>Ensure that restrooms and other high touch surfaces such as hand wash stations, countertops and diaper changing tables are cleaned and disinfected regularly with EPA-approved disinfectants against COVID-19.</p>	<ul style="list-style-type: none"> • Make a plan for frequent cleaning of toilets and hand wash stations. The interior surfaces and door handles of restrooms should be cleaned multiple times a day, preferably between users. Hand wash stations should also be wiped down multiple times a day with EPA-approved disinfectants. • If your event will last multiple days, consider having the toilets pumped at the end of each day. Even if they are not heavily used, attendees experience a pumped toilet as cleaner than one that had been used the day before, and during the pandemic their expectations for "extreme sanitation and cleaning" are high. Of course if the units have been used 200 times or more they need to be pumped regardless. • Your portable sanitation provider will be glad to discuss cleaning and pumping options with you. These may include providing an attendant on site to do the cleaning or providing you with cleaners and procedures to do it yourself.

CDC REQUIREMENTS/PSAI STANDARD	GUIDANCE FOR EVENT PLANNERS
<p>Be sure you abide by the Americans with Disabilities Act (ADA).</p>	<ul style="list-style-type: none"> • Work with your portable sanitation provider to ensure you have the right ratio of ADA equipment required for public events. • Remember: it cannot be more difficult to reach an ADA unit than to reach a standard unit. So you may need extra ADA equipment around the venue so that persons covered under the ADA do not have to travel further to reach this equipment than able-bodied people must travel. • Also be sure that your paths of travel to the ADA equipment are accessible, avoiding curbs, soft terrain, and other things that would make it hard to reach.

Guidance for Agriculture

The requirements for portable sanitation on agricultural work sites vary considerably even when COVID-19 is not a factor. In addition to the usual OSHA guidelines¹⁰ and recommendations from various food-handling trade groups, most states have their own rules around good agricultural practices (GAP) as they pertain to tending and harvesting crops for food. In some cases, counties within states have even more stringent guidelines. You should always check your local rules as they may pertain to agriculture and follow whatever is the most stringent set of requirements that apply to your area. What follows is based on guidance for agricultural sites published by the CDC, ANSI/PSAI Standard Z4.4 providing minimum standards for sanitation in field and temporary labor camps, the PSAI’s previously published guidance for GAP pertaining to portable sanitation with updated information in light of COVID-19.^{11,12,13}

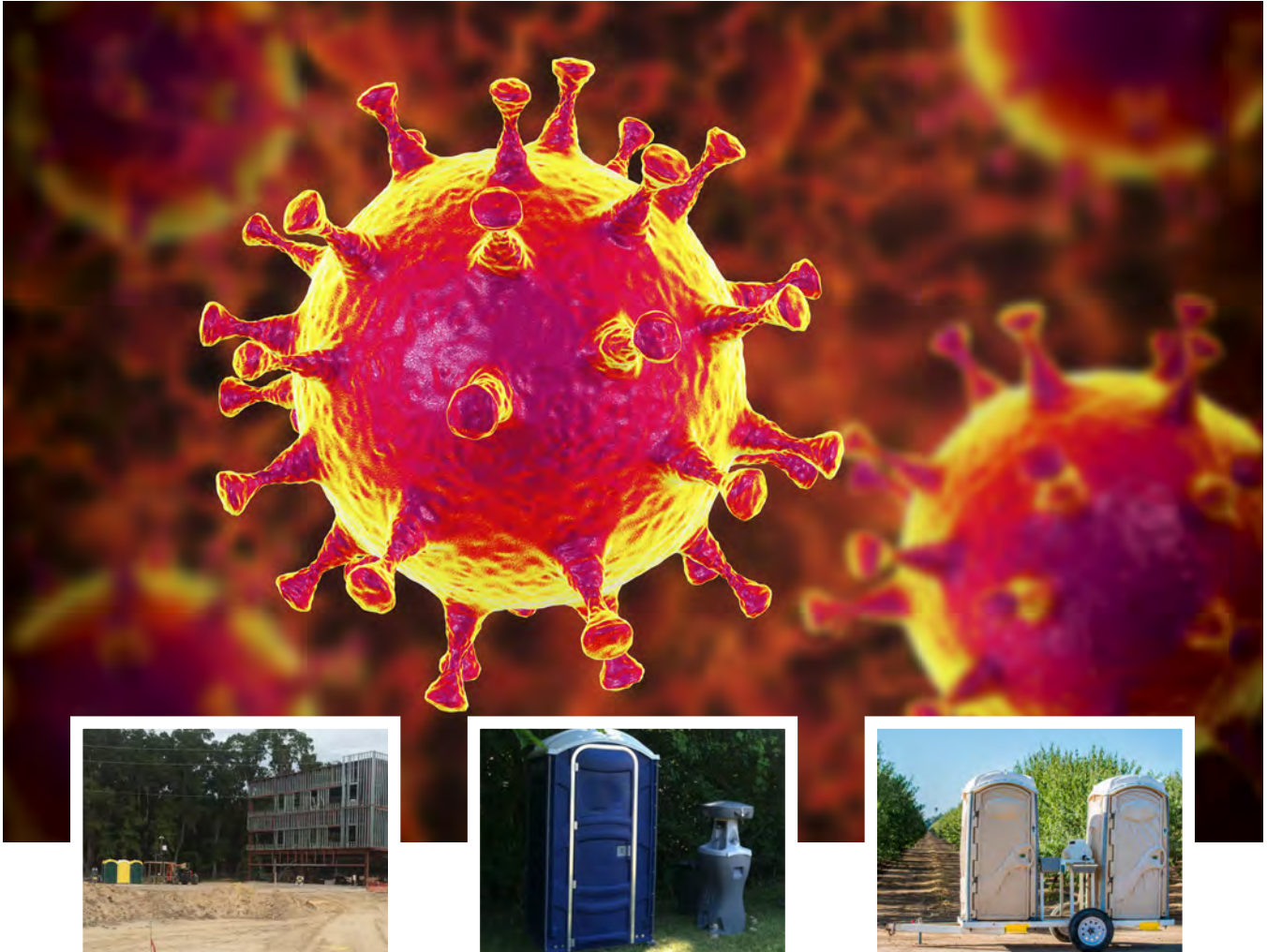


CDC REQUIREMENTS/PSAI STANDARD	GUIDANCE FOR AGRICULTURAL JOB SITES
<p>Encourage farmworkers to wash their hands often with soap and water for at least 20 seconds.</p>	<ul style="list-style-type: none"> • Make sure you have enough hand wash facilities on your job site at all times. At a minimum, the PSAI suggests you assume each employee will need at least 5 washes per day and possibly more. This includes once when arriving on the job, 1-2 times after using the toilet, once before a meal, and once at the end of the shift. <p>If you doubt people will wash their hands 5 times a day, update your training and procedures to ensure they wash upon arrival and exit, after toileting and before eating. CDC recommends additional washes if hands are soiled, have been sneezed/ coughed in, or if gloves have been changed.</p> <ul style="list-style-type: none"> • Note that portable handwash equipment varies in its capacity, so discuss the total number of washes or sanitizations each piece of equipment will provide. A rule of thumb is 300 washes per unit. • Note that hand sanitizer is not an acceptable substitute in agricultural settings because it kills bacteria but does not actually clean the hands. It can only be used if hands are not “visibly soiled or dirty.”
<p>Farmworkers must have reasonable access to permanent and/or temporary hand washing facilities equipped with soap, potable water, and clean, single-use towels. Easy access is especially important in areas where multiple farmworkers are working; increase the number of hand washing stations to minimize the distance to a station and the likelihood of crowding at stations. Sanitizing stations should be in multiple locations on the farm, if feasible, such as the point of entry or exit to a farm field, the location where farmworkers clock in/out, and, if possible, in individual containers made available to workers in field settings.</p>	<ul style="list-style-type: none"> • Discuss the layout of the job site and the placement of the hand wash or sanitizer stations on your site. Also discuss how they will be stocked and sanitized between services from your provider, who will provide the supplies/cleaners, and how cleaning will be documented. • Make sure that your provider is using soap and sanitizer that is approved for use with food products.
<p>Limit close contact with others by maintaining a distance of at least 6 feet, when possible.</p>	<ul style="list-style-type: none"> • Ensure enough portable restroom units are on site so that lines do not form during breaks. • In no case should fewer units be present than the ANSI/PSAI Z4.4-2016 standard of 1 unit per 10 workers for a 40-hour work week. <p>When portable sanitation service technicians visit job sites, they will be wearing masks and face shields among other personal protective equipment (PPE). These will be left on while interacting within 6 feet of workers on the job site.</p>

CDC REQUIREMENTS/PSAI STANDARD	GUIDANCE FOR AGRICULTURAL JOB SITES
<p>Portable toilets should be cleaned and disinfected periodically through the shift, as well as at the beginning and end of every shift.</p>	<ul style="list-style-type: none"> • Toilets should be pumped no less than twice per week.¹⁴ • Talk with your portable sanitation provider about the need for frequent disinfection of the toilets and the products that are effective against COVID-19 according to CDC and the Environmental Protection Agency (EPA), taking into account whether they are safe in proximity to food products if your operation handles food.¹⁵ <p>Be sure to document in the service agreement or some other formal manner: (1) how often your portable sanitation provider will be on your site to provide service, (2) what cleaning products they will use, (3) whether they will leave products with you so that ongoing cleaning can occur between their visits to your site between services, and (4) how the cleaning will be documented.</p>
<p>Do not move portable toilets on your agriculture site unless they have been pumped first.</p>	<p>While it is unclear whether COVID-19 can be spread via fecal matter, it is known that the virus resides in waste, as do a host of other bacteria that could contaminate the food supply. Moving a portable unit with waste in it dramatically increases the chances of a spill and should be avoided whenever possible.</p> <p>Work with your portable sanitation provider to ensure you have enough units placed strategically over your work area so that they do not have to be moved between pumping services.</p>
<p>If proper hand wash stations cannot be obtained, employers are advised to “Provide a large (5+ gallon) bucket with a lid and tap that can be used to provide water for handwashing.” If this method is used, the water tap should be regularly cleaned and disinfected, and the contaminated wastewater must be collected and treated in accordance with local laws and environmental regulations. Provide fresh clean water daily.</p>	<p>The CDC actually provides this guidance because so many job sites are having trouble getting enough hand wash facilities. How can your portable sanitation provider help?</p> <p>Even though your provider may be short of proper hand wash stations, ask about other options they can provide that are at least as good as the “large bucket” option CDC allows. Remember, they do this for a living and will be glad to help you problem-solve until the production of hand wash units catches up with demand.</p>

Conclusion

Every day brings new information about preventing the spread of COVID-19. Even when we ultimately develop treatments and vaccines that reduce its impact on health, the above measures just make sense. They will not only help control the spread of COVID-19, they will help prevent the spread of other communicable diseases such as cold, flu, hepatitis, e coli, and others that are common where people gather. The PSAI strongly urges you to implement the above recommendations during the current pandemic and to adopt them in the future for the good of everyone.



Sources

- ¹ See, for example, Part 1910.141 – OSHA Standards, General Environmental Controls, Sanitation, Part 1910.142 – OSHA Standards, General Environmental Controls, Temporary Labor Camps , and Part 1928.110 – OSHA Standards, General Environmental Controls, Field Sanitation among others at <https://osha.gov>, as well as ANSI/PSAI Z4.3-2016 Sanitation - Nonsewered Waste-Disposal Systems – Minimum Requirements at <https://ansi.org>.
- ² See <https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/construction-workers.html>
- ³ See <https://www.osha.gov/laws-regs/oshact/section5-duties>
- ⁴ This twice a week minimum standard is required by state-level OSHA requirements and is also supported by the Association of General Contractors (AGC) in some areas (see <https://osha.oregon.gov/covid19/Pages/covid-19-contractors.aspx> and <https://www.agc.org/sites/default/files/Files/Safety%20%26%20Health/COVID%2019%20job-site%20practices.pdf> for example). In other areas, AGC does not specify frequency beyond saying contractors should “request additional/ increased sanitation” of portable restrooms over pre-COVID-19 levels (see, for example, <https://www.agcwi.org/covid-19.html>). Regardless, both CDC and OSHA are clear that more frequent cleaning of toilets is required than usual. Thus the prior once a week standard must be increased to at least twice a week to meet the spirit of the CDC/OSHA guidance.
- ⁵ See <https://www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2-covid-19>
- ⁶ See <https://www.osha.gov/Publications/OSHA3990.pdf>
- ⁷ Enigma Research 2020 Return to Live Events Survey <https://www.fairsandexpos.com/files/galleries/ReturnToLiveEventsSurvey.pdf>
- ⁸ See CDC’s guidance on mass gatherings at https://www.cdc.gov/coronavirus/2019-ncov/downloads/Mass-Gatherings-Document_FINAL.pdf and <https://www.cdc.gov/coronavirus/2019-ncov/community/large-events/considerations-for-events-gatherings.html>
- ⁹ See PSAL resources at <https://psai.org/renting-portable-units/>
- ¹⁰ See <https://www.osha.gov/laws-regs/regulations/standardnumber/1928/1928.110> and <https://www.govinfo.gov/content/pkg/CFR-2019-title40-vol26/xml/CFR-2019-title40-vol26-sec170-411.xml>
- ¹¹ See ANSI/PSAI Z4.3-2016 American National Standard for Sanitation-Fields and Temporary Labor Camps – Minimum Requirements at <https://ansi.org>.
- ¹² See CDC guidance at https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-agricultural-workers.html?deliveryName=USCDC_2082-DM30458#cleaning
- ¹³ See PSAL Good Agricultural Practices related to portable sanitation <https://psai.org/wp-content/uploads/2020/06/GAP-updated-6-2020.pdf>
- ¹⁴ Both CDC and OSHA are clear that more frequent cleaning of toilets is required than usual. Thus the prior once a week standard must be increased to at least twice a week to meet the spirit of the CDC/OSHA guidance.
- ¹⁵ See <https://www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2-covid-19>



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