

## **AWO List of Situations in which Mask-Wearing May Create Risks**

AWO member companies have instituted safety and health policies and procedures to mitigate COVID-19 risks in the workplace – whether shoreside or in their fleets.

The Coast Guard's [MSIB 02-21 Change-1](#), as well as [CDC](#) and [Coast Guard](#) FAQs, provide the maritime industry with guidance on the CDC requirement for mask-wearing on commercial vessels and at seaports and emphasize that wearing a mask is not required if it would create a risk to workplace health, safety, or job duty as determined by the relevant workplace safety guidelines or federal regulations. To inform and help member companies to adapt their mask-wearing policies or guidance, AWO convened a working group of industry safety professionals to identify and document situations in which mask-wearing may create such risks for industry personnel.

This list is intended to be a resource for member companies, and as such, its use is voluntary. This list reflects the working group's consensus of common industry situations in which mask-wearing may create health, safety, or job duty risks, but does not purport to be a complete catalogue of all situations in which mask-wearing creates such risks. It is recommended that each company undertake a risk assessment that contemplates its own relevant workplace safety guidelines and federal regulations applicable to its operations, as well as its unique operational needs and the range of COVID-19 mitigation measures that may factor into the protection of its workforce (e.g., social distancing, ventilation, testing, vaccination, etc.).

**Note:** The CDC and Coast Guard FAQs clearly state that mask-wearing is **not required** when vessel crewmembers are alone in their cabin; when they are alone and are sleeping or resting; when they are eating or drinking; or when they are alone in a work area, whether indoors or outdoors.

### **When may mask-wearing create a risk to workplace health, safety, or job duty in the tugboat, towboat and barge industry?**

- When the working environment heat index is 91 degrees Fahrenheit or higher. [91 degrees is the threshold identified in [OSHA guidance](#) at which employers should implement precautions and heighten awareness of heat-related illness.]
- When an employee is experiencing one or more of the signs and symptoms of heat-related illness, including but not limited to: headache, nausea, dizziness, weakness, irritability, confusion, thirst, heavy sweating, or a high body temperature.
- When mask-wearing interferes with an employee's field of vision while conducting operational activities.
- When an employee is required to wear safety glasses or goggles, due to the risk of fogging interfering with the employee's field of vision.
- When an employee is required to wear other personal protective equipment that covers the nose and mouth, such as a respirator.
- When the muffling effect of a mask impedes the clear communication necessary for safe operations.

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- This may include: when doing tow work or engaging in other activities in which speech reception may be degraded by distance, exertion, and heavy breathing; when communicating by radio; or when around loud machinery that obstructs hearing.
- When an employee is in an environment in which chemical vapors are present that may be collected and concentrated by a mask.
- When an employee is smoking in a designated smoking area.

If you have questions or concerns, please contact your AWO Safety Team at [safety@americanwaterways.com](mailto:safety@americanwaterways.com).