

COVID-19 Prevention Program

CASROVILLE CSD

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COVID-19 Prevention Program for Castroville CSD

COVID-19 PANDEMIC

The novel coronavirus, SARS-CoV-2, causes a viral respiratory illness called COVID-19, which can make people sick with flu-like and other symptoms. The virus spreads easily when an infected person sneezes, coughs, or speaks, sending tiny droplets into the air. These droplets can land in the nose, mouth, or eyes of someone nearby and cause illness. The virus can also be caught from airborne virus, when small particles of infectious virus remain suspended in the air and people inhale them. People can also become infected if they touch an infectious droplet on a surface and then touch their own nose, mouth, or eyes.

Some of the symptoms of COVID-19 are cough, fever, shortness of breath, and new loss of taste or smell. Some people with mild cases may have no symptoms at all yet still can spread the virus. Staying at least six feet away from people outside of your household, covering your nose and mouth with a face covering, and washing hands often with soap and water can help stop COVID-19 from spreading in the workplace.

COVID-19 PREVENTION PROGRAM

Castroville CSD is committed to protecting our employees and preventing the spread of COVID-19 at our workplace. We developed this program to reduce our workers' risk of catching and spreading this virus. We encourage employees to share information about potential COVID-19 hazards at our workplace and assist in evaluating these hazards. We will investigate all workplace illnesses and correct hazards that are identified. We stay informed on the virus presence in our community as well as recommendations made by national and local health agencies. We review and update this plan as necessary. This plan was last reviewed on (03/16/21).

DESIGNATION OF RESPONSIBILITY

(Plan Administrator – J. Eric Tynan, General Manager has the authority and responsibility for implementing this plan in our workplace. All managers and supervisors are responsible for implementing this plan in their assigned work areas and ensuring employees' questions are answered in a language they understand.

All employees are required to follow the policies and procedures laid out in this plan, use safe work practices, and assist in maintaining a safe work environment.

IDENTIFICATION AND EVALUATION OF COVID-19 HAZARDS

We evaluate our workplace and operations to identify tasks that may have exposure to COVID-19. The evaluation includes all interactions, areas, activities, processes, equipment, and materials that could present potential exposure to COVID-19. Assessments include employee interactions with all persons who may be present in the workplace: contractors, vendors, customers, and members of the public. Evaluations include:

- Identification of places and times when people may gather or come in contact with each other, even if they aren't working. Examples: meetings, trainings, workplace entrances, bathrooms, hallways, aisles, walkways, elevators, break or eating areas, cool-down areas, and waiting rooms.
- Employees' potential workplace exposure to all persons at the workplace. We will consider how employees and others enter, leave, and travel through the workplace. Examples: co-workers, employees of other businesses, the public, customers or clients, and independent contractors.
- Existing COVID-19 prevention measures and whether we need different or additional control measures.

Employee Participation - We encourage employees to participate in this evaluation. They can contact J. Eric Tynan to share information on potential COVID-19 hazards at our workplace or to assist in evaluating these hazards.

We will evaluate how to maximize the amount of outdoor air entering our indoor spaces and if it is possible to increase the filtration efficiency to the highest level possible for our ventilation system.

Employees may confidentially inform us if they have a higher risk for severe illness from COVID-19, such as those with conditions like lung disease, obesity, or cancer. They will have priority for lower exposure job assignments or working from home whenever possible.

The jobs/tasks/activities at Castroville CSD have been assessed as follows:

Table 1 – Risk Assessment

Job Title or Task	Description of Exposure Risk
Entering workplace	A couple of employees in close proximity to each other
Assisting water customer at counter	Close interaction with another person for extended period of time

CORRECTION OF COVID-19 HAZARDS

We treat all persons, regardless of symptoms or negative test results, as potentially infectious. We select and implement feasible control measures to minimize or eliminate employee exposure to COVID-19. We review orders and guidance COVID-19 hazards and prevention from the State of California and the local health department, including general information and information specific to our industry, location, and operations. We correct unsafe or unhealthy conditions, work practices, policies, and procedures in a timely manner based on the severity of the hazard.

[Table 2 – Controls to Reduce Exposure

Job Title/Task/Work Area	Engineering Controls	Administrative Controls	PPE
Entering workplace	Use natural ventilation; have screening station set up outdoors	Stagger work shift start times when possible; provide visual cues and enforce physical distancing; face coverings required	Provide face shield for screener
Assisting water customer at counter	Install Plexiglas barriers between employee and customer	Face coverings required; encourage contact-less payment	Provide nitrile gloves for handling money

We inspect periodically to check that controls are effective, to identify unhealthy work conditions or practices, and to ensure compliance with this plan. Any deficiencies are corrected right away, and we update this plan if needed.

Engineering Controls – Equipment and Building Systems to Minimize Exposures

Our engineering controls for COVID-19 include:

- Evaluating if we can increase filtration efficiency to the highest level compatible with the existing ventilation system.
- Maximizing outdoor air for ventilation as much as feasible except when EPA’s Air Quality Index is greater than 100-or when increasing outdoor air would cause harm to employees, such as excessive heat or cold.
- Installing cleanable, solid partitions between coworkers or between workers and customers when 6 feet of distance cannot be maintained.

Administrative Controls – Policies, Procedures, and Practices to Minimize Exposure

Our administrative controls for COVID-19 are: (add more detail to these as needed to explain how they will be implemented at your workplace.)

- **Limiting Access** to the workplace to only necessary staff. Employees work from home whenever possible.
- **Screening Employees and Visitors** to our facility through the following methods:
 - € Home Screening - Employees self-screen using a [symptom screening form](#) prior to leaving for work.
 - € Onsite Screening - Face coverings are required during the screening process and non-contact thermometers are used.
 - € Self-Screening of Visitors - We have a symptom screening form posted at the entrances to our worksite and ask visitors to self-screen before entering the worksite.

We prohibit any employee or visitor sick with any potentially contagious from entering the workplace. Anyone exhibiting any potential symptoms of COVID-19 should contact J. Eric Tynan, General Manager and leave the worksite.

- **Physical Distancing:** Everyone must keep a six-foot distance from others at all times except where we can show that it is not possible or for brief times during the movement of people in the workplace. When six feet of distance cannot be maintained, people will be as far apart as possible. Methods for physical distancing include:
 - Reducing the number of persons in an area at one time (including visitors)
 - Visual cues such as signs and floor markings to show employee locations and paths of travel
 - Staggered arrival, departure, work, and break times
 - Adjusted work processes (such as reducing production speed) to allow greater distance between employees
 - Telework or other remote work arrangement
- **Wearing a Face Covering:** We provide face coverings to all employees and require they be worn when indoors, when outdoors if less than six feet from another person, and as required by the local health department or CDPH. We will not prevent any employee from wearing a face covering when required unless it would create a safety hazard, such as interfering with the safe operation of equipment. The face coverings provided will be cloth or woven material, fit snugly, and completely cover the nose and mouth. Face coverings must be clean and undamaged. **Face coverings are not respiratory protection and do not replace physical distancing requirements.**

Employees are not required to wear a face covering in the following situations:

- When an employee is alone in a room.
- While eating or drinking at the workplace, provided employees are at least six feet apart and outside air supply to the area has been maximized to the extent possible.
- When employees wear respiratory protection in accordance with Section 5144 or other Title 8 safety orders.
- When employees cannot wear face coverings due to a medical or mental health condition or disability. This includes a hearing-impaired person or someone using sign language to communicate. Employees exempted from wearing a face covering due to medical conditions, mental health conditions, or disability must wear an effective non-restrictive alternative, such as a face shield with a drape on the bottom that we will provide, if their condition or disability allows.
- When a specific task cannot be performed with a face covering. This exception is limited to the time period in which such tasks are being performed, and the unmasked employee shall be at least six feet away from all other persons unless unmasked employees are tested at least twice weekly for COVID-19.

Employees not wearing a face covering, face shield with drape, or respirator, for any reason, will stay at least six feet away from all other people in the workplace unless they are tested twice a week for COVID-19.

Signs are posted at the entrance to the workplace to communicate the requirement for face coverings by any non-employees entering the workplace. We provide face coverings to members of the public if necessary and instruct employees to remain at least six feet away from members of the public who will not wear a face covering.

- **Practicing Good Hygiene.** Wash hands with soap and water for at least 20 seconds, or use alcohol-based hand sanitizer with at least 60% alcohol. Hand sanitizer stations and hand hygiene signage are placed throughout the workplace. J. Eric Tynan, General Manager is responsible for ensuring hand hygiene stations are readily accessible and stocked with soap and paper towels, or sanitizer.
- **Prohibiting the Sharing of PPE and Other Workplace Equipment** such as phones, computers, and tools. If items must be shared, they are disinfected between uses by different people. Sharing of vehicles is minimized as much as possible.
- **Cleaning and Disinfecting Frequently.** Surfaces, especially frequently touched surfaces, will be disinfected with products that meet the [EPA's criteria for use against coronavirus](#). Disinfectants are used according to manufacturer's directions. Employees are trained on the hazards of the disinfectants, to use only in well-ventilated areas, any PPE that is required, and to never mix chemicals. Surfaces are disinfected according to the following schedule:

Table 3 – Disinfection Practices

Surface/Area	Disinfection Method/Product	Frequency
Bathrooms - sinks, soap and paper towel dispensers, door handles, stall locks, toilet seat and flush, toilet paper dispensers	<ol style="list-style-type: none"> 1. Use soap and water so surface is clean to sight and touch. 2. Apply dilute bleach solution (1/3 cup bleach per gallon of room temp water) to wet surface. 3. Allow to sit for at least 1 minute. 4. Wipe dry with a clean paper towel. 	Every four hours
Kitchen counter, sink, refrigerator	<ol style="list-style-type: none"> 1. Use soap and water so surface is clean to sight and touch. 2. Apply dilute bleach solution (1/3 cup bleach per gallon of room temp water) to wet surface. 3. Allow to sit for at least 1 minute. 4. Wipe dry with a clean paper towel 	Every four hours
Office Doors, Customer Counter top, employees desk	<ol style="list-style-type: none"> 1. Use soap and water so surface is clean to sight and touch. 2. Apply dilute bleach solution (1/3 cup bleach per gallon of room temp water) to wet surface. 3. Allow to sit for at least 1 minute. 4. Wipe dry with a clean paper towel 	Every two hours

Personal Protective Equipment (PPE) – Equipment Worn by Employees to Minimize Exposure

In general, employees WILL NOT use respirators at Castroville CSD for protection from COVID-19. If a hazard assessment determines respirators are needed, they will be used in accordance with [Title 8, Section 5144](#). Any PPE used to protect from COVID-19, such as gowns, face masks, and gloves, is selected based on function, fit, and availability. Employees are trained when and why PPE is necessary, how to properly put on and take off PPE, and how to clean, maintain, and store reusable PPE. Job hazard assessments are performed by supervisors to identify any PPE required for a specific job. Supervisors are responsible for ensuring that adequate supplies of PPE are available.

INVESTIGATING AND RESPONDING TO COVID-19 CASES IN THE WORKPLACE

Illness at the Workplace

We investigate all COVID-19 cases in the workplace. Our investigation includes verifying COVID-19 case status, obtaining information on COVID-19 test results and symptom onset, identifying and recording COVID-19 cases, and reporting when required by the regulations.

We maintain a daily log or other method to keep track of all employees and visitors at our workplace. This includes name, contact number, date, time in, time out, person(s) contacted, and area of the workplace accessed. We will use this information to identify individuals to contact following notification of a COVID-19 case at our workplace.

We will not reveal any personally identifiable information or employee medical information to any person or entity unless required by law (such as Cal/OSHA, local health department, and local law enforcement).

Notification

Employees must alert J. Eric Tynan, General Manager if they are having symptoms of COVID-19, had a possible COVID-19 exposure, were diagnosed with COVID-19, or are awaiting test results. We do not discriminate or retaliate against employees for reporting positive test results or symptoms.

Following notification of a positive test/diagnosis, we will immediately take the [following actions](#):

1. Determine the day and time the COVID-19 case was last present at the workplace, the date of the positive test/diagnosis, and the date the COVID-19 case first experienced symptoms.
2. Determine who may have had exposure to the COVID-19 case by reviewing the case's activities during the high-risk period. The high-risk period for persons who develop symptoms is from two days before they first develop symptoms until 10 days after symptoms first appeared and 24 hours have passed with no fever, without the use of fever-reducing medications, and symptoms have improved. The high-risk period for persons who test positive but never develop symptoms is from two days before until 10 days after their first positive test for COVID-19 was collected.
3. Within one day of becoming aware of a positive diagnosis, J. Eric Tynan, General Manager will notify in writing all employees and their authorized representatives, independent contractors and other employers onsite who were potentially exposed. Individuals with close contact will be instructed to quarantine at home. CDC defines [close contact](#) as being within six feet of an infected person for 15 cumulative minutes or more over a 24-hour period, starting 2 days prior to symptom onset until the sick person is isolated. When providing notice under this section, we will not disclose the identity of the infected person(s).
4. We will provide employees with potential COVID-19 exposure information about access to [COVID-19 testing](#), which will be offered at no cost during working hours, and isolation requirements resulting from a positive test.
5. Investigate whether any workplace factors contributed to the infection and how to further reduce that potential exposure.

We will provide information about [COVID-19 related leave benefits](#). Confidentiality will be maintained at all times.

We keep a record of and track all COVID-19 cases to include: employee's name, contact information, occupation, location where the employee worked, the date of the last day at the workplace, and the date of a positive COVID-19 test. This information is kept confidential.

Disinfection after Positive Test/Diagnosis

If it has been less than seven days since the sick employee has been in the facility, we will close off any areas used for extended periods of time by the sick individual and allow to air out up to 24 hours. The area will then be thoroughly cleaned and disinfected.

Exclusion from the Workplace

The following employees will be excluded from the workplace:

- Employees that have been exposed to COVID-19 until 10 days after the last known exposure.
- Employees who test positive for COVID-19 until the Return to Work criteria in the next section are met.

Employees excluded from work due to a positive diagnosis from a workplace exposure, or identified as exposed in the workplace, but are otherwise able and available to work will maintain their earnings, seniority, and all other rights and benefits. Information on available benefits will be provided at the time of exclusion.

Return to Work

Criteria for returning to work after testing positive for COVID-19 are as follows:

- Employees who tested positive and had symptoms can return to work when:
 - At least 10 days have passed since symptoms began, **AND**
 - At least 24 hours have passed with no fever (100.4°F or above) without the use of fever-reducing medications, **AND**
 - Other COVID-19 symptoms have improved.
- Employees who test positive but never have symptoms can return to work:
 - After at least 10 days have passed since the date of positive specimen collection.
- Employees who have completed an order to isolate or quarantine by a local or state health official. If the period of time was not specified, then it is 10 days from the issuance of an order to isolate or an order to quarantine.
- Employees that have approval from Cal/OSHA on the basis that removal of the employee would create undue risk to a community's health and safety. In these instances, effective control measures such as isolation or respiratory protection will be implemented to prevent infection of other employees at the workplace.

A negative test result is not required for an employee to return to work.

REPORTING, RECORDKEEPING, AND ACCESS

Reporting

[Reporting to the Local Health Department \(LHD\)](#) – This requirement also complies with AB 685.

Within 48-hours of knowledge, J. Eric Tynan, General Manager will notify the [local health department](#) (LHD), County of Monterey at (831) 755-4500, of any workplace outbreak of COVID-19. An outbreak reportable to our LHD is defined as at least three COVID-19 cases among workers at the same worksite within a 14-day period. We will work with the LHD to carry out contact tracing and follow all LHD recommendations including temporary closure of our business if advised.

[Reporting to our Claims Administrator – SB 1159](#) (This section applies to employers with five or more employees)

J. Eric Tynan, General Manager will report to the Sedgwick reporting portal at <https://intake.sedgwick.com/u/outbreak/postiveresult> or contact SDRMA at claims@sdrma.or or call, 1-800-537-7790 if you have any question when an employee has tested positive for COVID-19. This report will be made within three days of knowledge of an employees' positive test result.

[CAL/OSHA Recording/Reporting](#) - We will record on our 300 log all work-related COVID-19 cases that meet one of the following criteria: death, days away from work, restricted work or transfer to another job, medical treatment beyond first aid, loss of consciousness, significant injury or illness diagnoses by a physician or other licensed health care professional.

We will report any serious COVID-19 illness that required inpatient hospitalization or resulted in death to our local Cal/OSHA office as soon as possible, but in no case more than eight hours after knowledge.

Recordkeeping

Castroville CSD maintains records of the steps taken to implement this written program. These records include but are not limited to training, inspections, hazard identification, etc.

We keep a record of and track all COVID-19 cases. These records include the employee's:

- Name
- Contact information
- Occupation
- Location where the employee worked
- Date of the last day at the workplace
- Date of positive COVID-19 test

All medical information will be kept confidential. The log of COVID cases, with names and contact information removed, will be made available to employees, authorized employee representatives, or as otherwise required by law.

Access

This program will be made available at the workplace to employees, authorized employee representatives, and to representatives of Cal/OSHA.

COMMUNICATION SYSTEMS

We ask all employees to confidentially report, without fear of discrimination or retaliation, any symptoms, potential exposures, and possible hazards relating to COVID-19 at the workplace. Employees should make these reports to J. Eric Tynan, General Manager.

We explain to all employees how we accommodate employees at higher risk of severe COVID-19 illness. An employee can make a confidential report of his/her own high risk condition to J. Eric Tynan, General Manager.

If an employee is suspected of having a workplace exposure to COVID-19, we will provide information about access to COVID-19 testing at no cost. We will inform affected employees of the reason for testing and the potential consequences of a positive test. Local COVID-19 testing is available in our area through the following:

- Pinnacle HealthCare, 2 Rossi Circle, Salinas, CA 93907, (831) 387-7177. Note: Additional communication requirements may apply depending upon severity of outbreak. See Appendix A for multiple COVID-19 infections and outbreak procedures. See Appendix B for major outbreak procedures.

We communicate information about COVID-19 hazards and our COVID-19 policies and procedures to employees and other employers, persons, and entities that come in contact with our workplace. Other employers must ensure their employees follow our plan or equivalent to ensure protection of both their and our employees. When our employees are at another worksite, we will verify that procedures at the other worksite are protective of our employees, such as mask wearing and social distancing.

EMPLOYEE TRAINING AND INSTRUCTION

We provide all employees training and instruction on the symptoms of COVID-19 illness and exposure control methods in place at Castroville CSD including:

- Information on how COVID-19 spreads and infects people.
- Symptoms of COVID-19
- The importance of getting a COVID-19 test and staying out of the workplace if you have symptoms.
- Our symptom screening procedures for employees and all other visitors to the workplace
- Risk of exposure to COVID-19 on the job.
- Cleaning and disinfection schedules and procedures for our workplace.
- Control measures to protect employees from exposure and infection:
 - Requiring employees to stay home when sick.
 - Physical distancing. Employees must maintain at least 6' of separation from other individuals in the workplace. Since infectious aerosols can travel further than 6', face covering are required along with physical distancing at all indoor workplaces.
 - Frequent handwashing with soap and water for at least 20 seconds, or using hand sanitizer when handwashing sinks are not readily accessible.
 - Proper use of a face coverings and the fact that a face covering is NOT respiratory protection.
 - Covering coughs and sneezes.
- Acceptable PPE and proper use.
- What to do if they are sick and how to obtain a COVID-19 test.
- Information on COVID-19-related leave benefits available under workers' compensation law, the federal Families First Coronavirus Response Act, Labor Code sections 248.1 and 248.5, Labor Code sections 3212.86 through 3212.88, local governmental requirements, the Castroville CSD leave policies, and leave guaranteed by contract.
- The contents of this plan.

APPENDIX A - MULTIPLE COVID-19 INFECTIONS AND OUTBREAKS

The following procedures will be followed whenever there are three or more COVID-19 cases in our workplace within a 14-day period or the workplace has been identified by the Local Health Department (LHD) as the location of a COVID-19 outbreak. These procedures can be stopped only after no new COVID-19 cases are detected at our workplace for a 14-day period.

Testing

Castroville CSD will provide [testing to all employees](#) at no cost during working hours except for those not present during the outbreak period defined above. This testing will be done immediately after determination of an outbreak, and then again one week later; negative test results will not change the quarantine or health order status of any individual. Following these two tests, we will provide continuous testing to employees in the workplace during the defined outbreak period at least once a week, or more frequently if recommended by the LHD. We will provide additional testing as required by the Division in accordance with any special order from Cal/OSHA.

Exclusion from the Workplace

The following employees will be excluded from the workplace during an outbreak:

- Positive cases until return to work requirements are met.
- Employees that have been exposed to COVID-19 until 10 days after the last known exposure.

Employees excluded from work due to positive diagnosis or exposure but otherwise able and available to work will maintain their earnings, seniority, and all other rights and benefits. Information on available benefits will be provided at the time of exclusion.

Workplace Investigation, Review, and Hazard Correction

We will investigate all workplace illness to determine potential factors in the workplace that could have contributed to the COVID-19 outbreak. Additionally, we will review our relevant COVID-19 policies, procedures, and controls and we will implement changes needed to prevent further virus spread.

All investigations and reviews will be documented to include:

- Investigation of new or continuing COVID-19 hazards.
- Review of our leave policies and practices, including whether employees are discouraged from staying home when sick.
- Review of our COVID-19 testing policies.
- Investigation of the sufficiency of outdoor air.
- Investigation of the sufficiency of air filtration.
- Investigation into feasibility of physical distancing.

These reviews will be updated every 30 days that an outbreak continues with new information, new or previously unrecognized COVID-19 hazards, or as necessary. We will make changes based on investigations and reviews to reduce the spread of COVID-19 and consider such actions as moving work tasks outdoors, allowing employees to work remotely, increasing outdoor air supply to our indoor workplaces, improving air filtration to the highest MERV rating compatible with our air handling system, increasing physical distancing as much as possible, providing respiratory protection, or other possible control measures.

Notifications to the Local Health Department (LHD)

As soon as possible but at least within 48-hours of knowledge, J. Eric Tynan, General Manager will notify our LHD, County of Monterey Health Department, whenever there are three or more COVID-19 cases. We will work with the LHD to carry out contact tracing and follow all LHD recommendations including temporary closure of our business if advised. We will provide the LHD the total number of cases and for each case the following:

- Name
- Contact information
- Occupation
- Workplace location
- Business address
- Hospitalization and/or fatality status
- North American Industry Classification System (NAICS) code of the workplace
- Any other information requested

We will continue to update the LHD with additional case information during the outbreak period until there have been no detected COVID-19 cases for 14 days.

APPENDIX B – MAJOR COVID-19 OUTBREAKS

The following procedures will be followed whenever there are 20 or more COVID-19 cases in our workplace within a 30-day period. These procedures can be discontinued only after no new COVID-19 cases are detected at our workplace for a 14-day period.

Testing

Castroville CSD will provide [testing to all employees](#) present at the workplace during the relevant 30-day period and who remain at the workplace at no cost during working hours. Testing will be provided twice a week or more frequently if recommended by the Local Health Department (LHD).

Exclusion from the Workplace

The following employees will be excluded from the workplace:

- Positive cases until return to work requirements are met.
- Employees that have been exposed to COVID-19 until 10 days after the last known exposure.
- Employees excluded from work due to positive diagnosis or exposure but otherwise able and available to work will maintain their earnings, seniority, and all other rights and benefits. Information on available benefits will be provided at the time of exclusion.

Investigation of Workplace COVID-19 Illnesses

We will implement effective procedures for verifying COVID-19 case status, receiving information regarding COVID-19 test results and onset of COVID-19 symptoms, and identifying and recording COVID-19 cases. Upon notification of a COVID-19 case, we will do the following:

1. Determine the day and time the COVID-19 case was last present at the workplace, the date of the positive test/diagnosis, and the date the COVID-19 case first experienced symptoms.
2. Determine who may have had exposure to the COVID-19 case by reviewing the case's activities during the high risk period.
 - The high-risk period for persons who develop symptoms is from two days before they first develop symptoms until 10 days after symptoms first appeared and 24 hours have passed with no fever, without the use of fever-reducing medications, and symptoms have improved.
 - The high-risk period for persons who test positive but never develop symptoms is from two days before until 10 days after their first positive test for COVID-19 was collected.
3. Within one day of becoming aware of a positive diagnosis, J. Eric Tynan, General Manager will notify in writing all employees, and subcontracted employees, who were potentially exposed and instruct individuals with close contact to quarantine at home.
 - CDC defines [close contact](#) as being within six feet of an infected person for 15 cumulative minutes or more over a 24-hour period starting 2 days prior to symptom onset until the sick person is isolated.
4. Employees with potential COVID-19 exposure will be provided with information about access to COVID-19 testing, which will be offered at no cost during working hours, and the possible consequences of a positive test.
5. Investigate whether any workplace factors contributed to the risk infection and how to further reduce that potential exposure.

We will ensure that all personal identifying information and employee medical records are kept confidential and that testing and medical services will be provided in a manner that ensures confidentiality of our employees. Non-redacted information on COVID-19 cases shall be provided to the local health department, CDPH, the Division, the National Institute for Occupational Safety and Health (NIOSH), or as otherwise required by law immediately upon request.

COVID-19 Hazard Correction

In addition to the engineering controls, administrative controls, and PPE provisions of our COVID-19 Prevention Program, we will do the following:

- Filter recirculated air with Minimum Efficiency Reporting Value (MERV) 13 or higher efficiency filters if compatible with our ventilation system. If MERV 13 or higher efficiency filters are not compatible with our system, we will use the highest MERV rated filter possible.
- Evaluate the benefits that portable or mounted High Efficiency Particulate Air (HEPA) filtration units, or other air cleaning systems, may offer in reducing the risk of transmission and implementing wherever possible.
- Evaluate the need for respiratory protection or changes to current respiratory protection in use. Any respiratory use will be in accordance with 8CCR5144.
- Implement any other control measures necessary by the issuance of an Order to Take Special Action by the Division in accordance with 8CCR332.3.

Notifications to the Local Health Department (LHD)

As soon as possible but at least within 48-hours of knowledge, J. Eric Tynan, General Manager will notify our LHD, County of Monterey Health Department, whenever there are three or more COVID-19 cases. We will work with the LHD to carry out contact tracing and follow all LHD recommendations including temporary closure of our business if advised. We will provide the LHD the total number of cases and for each case the following:

- Name
- Contact information
- Occupation
- Workplace location
- Business address
- Hospitalization and/or fatality status
- North American Industry Classification System (NAICS) code of the workplace
- Any other information requested

We will continue to update the LHD with additional case information during the outbreak period until there have been no detected COVID-19 cases for 14 days.