



Ross Valley Sanitary District (RVSD) COVID-19 Exposure Control Plan

Date Created: April 3, 2020

Updated July 17, 2020 and November 18, 2020

UPDATE: January 11, 2021

Introduction

This document establishes the Ross Valley Sanitary District (District) approach to coronavirus (COVID-19). This COVID-19 Exposure Control Plan (Plan) provides a response to enable the District to prepare for and, mitigate against the risk of COVID-19 exposure to the District's office staff and field workers. This Plan supplements the District's Injury and Illness Prevention Program (IIPP).

This document is intended to be a "living document" that will evolve as the Center for Disease Control (CDC), the Department of Labor Occupational Safety & Health Administration (OSHA) and State and Local health officials release new information about COVID-19.

Resources

California Services and Information on COVID-19

<https://covid19.ca.gov/>

County of Marin Health Department

<https://www.marinhhs.org/>

Department of Labor Occupational Safety & Health Administration (OSHA)

<https://www.osha.gov/SLTC/covid-19/controlprevention.html>

Center for Disease Control and Prevention (CDC)

<https://www.cdc.gov/coronavirus/2019-ncov/index.html>

California Water Environment Association (CWEA)

<http://cweawaternews.org/topics/coronavirus-safety-wastewater-workers/>

California Association of Sanitation Agencies (CASA)

<http://casaweb.org/covid-19/>

California Department of Public Health (CDPH)

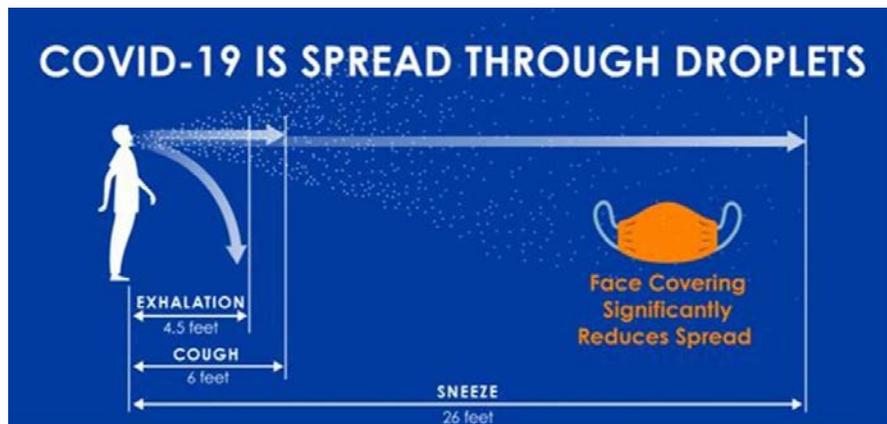
<https://www.cdph.ca.gov/>

California Department of Industrial Relations (DIR) COVID-19 Outbreaks

https://www.dir.ca.gov/title8/3205_1.html

Background

COVID-19 is a new disease, and the CDC continues to learn about how it is spread. COVID-19 is thought to spread mainly through close contact from person-to-person in respiratory droplets. There are two main routes of transmission of the COVID-19 virus, respiratory and contact. Respiratory droplets are generated when an infected person coughs or sneezes. Any person who is in close contact with someone who has respiratory symptoms (sneezing, coughing) is at risk of being exposed to potentially infective respiratory droplets. Droplets may also land on surfaces where the virus could remain viable; thus, the immediate environment of an infected individual can serve as a source of contact transmission.¹



District employees, vendors, contractors and visitors are all required to observe the following exposure control protocols:

- Do not enter the workplace if you have a cough or fever. *Stay home if you are sick.*
- Face coverings are required in accordance with State and local health orders.
- Maintain a minimum 6-foot distance between people at all times. Avoid unnecessary physical contact.
- Wash hands frequently, for a minimum of 20 seconds, or use hand sanitizer if soap and water are unavailable. Don't touch your face.

¹ World Health Organization, Interim guidance (March 19, 2020)

Essential Worker Status

In accordance with Executive Order N-33-20, the State Public Health Officer has designated a list of “Essential Critical Infrastructure Workers”. District staff are designated as essential workers under the Water and Wastewater Sector, as well as the Government Operations and Other Community-Based Essential Functions.

Designation of Responsibility

The District designates one person to have overall responsibility to administer this Exposure Control Plan. The District has ensured that this person is knowledgeable in principles and practices as they apply to our facilities, services, and operation.

The administrator of the Plan is Operations and Maintenance Manager Stephen Miksis

The administrator is responsible for ensuring the following:

- Communicating this Plan to all District workers.
- Disseminating COVID-19 Safety Communications to all District workers and Labor Unions.
- Engaging District employees to solicit their feedback and concerns.
- Implementing the COVID-19 preventive measures identified in this plan.
- Convening a COVID-19 Employee Safety Committee to receive, document and respond to employee concerns.
- Updating this Plan to incorporate newly published COVID-19 information.

Exposure Risk Assessment

Based on available information from the CDC and OSHA, the District conducted a risk assessment of work it performs and has determined that work performed by District employees who work in an office setting and in the field are in low to medium risk exposure categories.

Low Exposure Risk

Low exposure risk jobs are those that do not require contact with people known to be, or suspected of being, infected with COVID-19 or frequent close contact with (i.e., within 6 feet of) the general public.

Medium Exposure Risk

Medium exposure risk jobs include those that require frequent and/or close contact with (i.e., within 6 feet of) people who may be infected with COVID-19, but who are not known or suspected COVID-19 patients.

District office workers have brief contact with the general public (mail and other deliveries only) and minimal contact with other District employees.

District field workers may have brief contact with the general public and minimal contact with other District employees.

District field and office environments are both considered low exposure risk.

For low risk exposure jobs, the CDC recommends that employers continue to use existing health and safety practices to prevent the spread of COVID-19.²

Where possible, the District will implement additional measures in the field and office environments to control potential exposure to COVID-19.

² See *Guidance on Preparing Workplaces for COVID-19* OSHA 2990-03-2020, at 21

Exposure Controls for Office Work Environments

- Health self-checks are required for all personnel prior to coming to work.
- Face coverings are required in accordance with State and local health orders.
- Personnel are required to maintain a minimum 6-foot distance between people at all times, and to avoid unnecessary physical contact.
- Personnel are asked to wash hands their hands frequently, for a minimum of 20 seconds, or use hand sanitizer regularly.

Additional exposure control measures for office work environments:

- Close the office to the general public. Establish email and telephone customer service processes.
- Provide employees with disposable wipes or equivalent cleaning supplies to clean commonly used surfaces (for example, doorknobs, keyboards, remote controls, desks).
- Provide daily janitorial cleaning of all frequently touched surfaces in the workplace, such as countertops, door handles, and sink faucets.
- Provide hand sanitizer for employees and visitors.
- Provide tissues and/or paper towels to use as barriers between hands and high touch surfaces such as door handles, microwave and coffee control panels, refrigerators, etc.
- Install physical barriers where feasible, such as cubicle office walls, in areas where workers are seated within six feet of one another.
- Install high efficiency air filters and increase ventilation in office environments.
- All visitors are given temperature checks and must pass health pre-screening questions prior to entering District work offices.

Exposure Control for Field Work Environments

According to online OSHA publications, there is no evidence to suggest that additional COVID-19-specific protections are needed for employees involved in wastewater management operations. OSHA recommends that employers ensure workers follow routine practices to prevent exposure to wastewater, including using exposure controls, safe work practices, and PPE normally required for work tasks when handling untreated wastewater.

- Health self-checks are required for all personnel prior to coming to work.
- Face coverings are required in accordance with State and local health orders.
- Personnel are required to maintain a minimum 6-foot distance between people at all times, and to avoid unnecessary physical contact.
- Personnel are asked to wash hands their hands frequently, for a minimum of 20 seconds, or use hand sanitizer regularly.

There is no evidence to suggest that additional COVID-19-specific protections are needed for employees involved in wastewater management operations. The District currently provides employees job-specific safety hazard exposure trainings. All District employees are responsible for complying with safe and healthful work practices outlined in those trainings.

Based on current information published by the CDC, wastewater workers should use standard practices, practice basic hygiene precautions, and wear personal protective equipment (PPE) as prescribed for current work tasks.³

In accordance with the District's Injury and Illness Prevention Program (IIPP), employees are required to protect themselves from hazardous exposures/conditions by using the proper personal protective equipment (PPE) when required or necessary for to complete their current job tasks.

³ <https://www.cdc.gov/coronavirus/2019-ncov/community/sanitation-wastewater-workers.html> Page last reviewed May 28, 2020. Content source: National Center for Immunization and Respiratory Diseases (NCIRD), Division of Viral Diseases

The District provides puncture-resistant gloves and face and eye protection to prevent worker exposure to job hazards. To prevent COVID-19 exposure, the District is requiring its employees to continue using these PPE preventions.

The District is actively monitoring the CDC, OSHA and State and Local health offices for emerging PPE COVID guidance. The District will update this plan when these agencies public new information and guidance.

Vehicle Assignments and Vehicle Use by District Employees

- Vehicle occupancy shall be restricted to one person at a time. If multiple occupants in one vehicle is unavoidable, all occupants of the vehicle must wear a face mask plus goggles or a face mask plus face shield.
- If multiple occupants in one vehicle is unavoidable, and the total driving time is 15 minutes or less, occupants of the vehicle may substitute safety glasses for goggles or face shield.
- To the extent possible, staff shall be assigned the same vehicle on subsequent days.
- Staff will wash their hands before entering a vehicle.
- Staff are required to clean vehicles after use.
- Staff will notify their Supervisor if cleaning supplies need to be restocked in the vehicle.

Other Safe Work Practices

To further reduce potential exposure to COVID-19, the District engages in the following additional safe work practices:

- Discontinue non-essential in-person meetings.
- Conduct remote COVID-19 prevention trainings.
- Conduct regular work meetings by teleconference or by phone, including public meetings such as Board of Directors meetings.

- Limit any and all in-person meetings to 3 persons and require participants to follow CDC social distancing guidelines.
- Allow teleworking and/or alternative work shifts for certain job functions.
- Discontinue non-essential travel.
- No eating with each other unless outdoors and greater than 6 feet apart.
- No communal food in common areas. Food may not be brought in for sharing.
- No congregating in the kitchen or bathrooms. One person at a time.
- Minimize congregation in the Landing, Kerner, and PS13 crew rooms.
- No spending more than 15 consecutive minutes indoors with any other individual, with exceptions for some maintenance activities.
- No using PS13 bathrooms unless on the pump crew.
- If no place indoors available to wait during donning and doffing, wait in a vehicle.

Travel Advisory Updated November 13, 2020

The incidence of COVID-19 is increasing in many states and countries. Persons arriving in California from other states or Californians returning from other states or countries could increase the risk of COVID-19 spread. In addition, travel itself can be a risk for exposure to COVID-19, particularly travel through shared conveyance such as air, bus or rail travel.

Travel Advisory for Non-Essential Travel ^[1]

1. Persons arriving in California from other states or countries, including returning California residents, should practice self-quarantine for 14 days after arrival. These persons should limit their interactions to their immediate household. This recommendation does not apply to individuals who cross state or country borders for essential travel.^[2]

2. Californians are encouraged to stay home or in their region and avoid non-essential travel to other states or countries. Avoiding travel can reduce the risk of virus transmission and bringing the virus back to California.

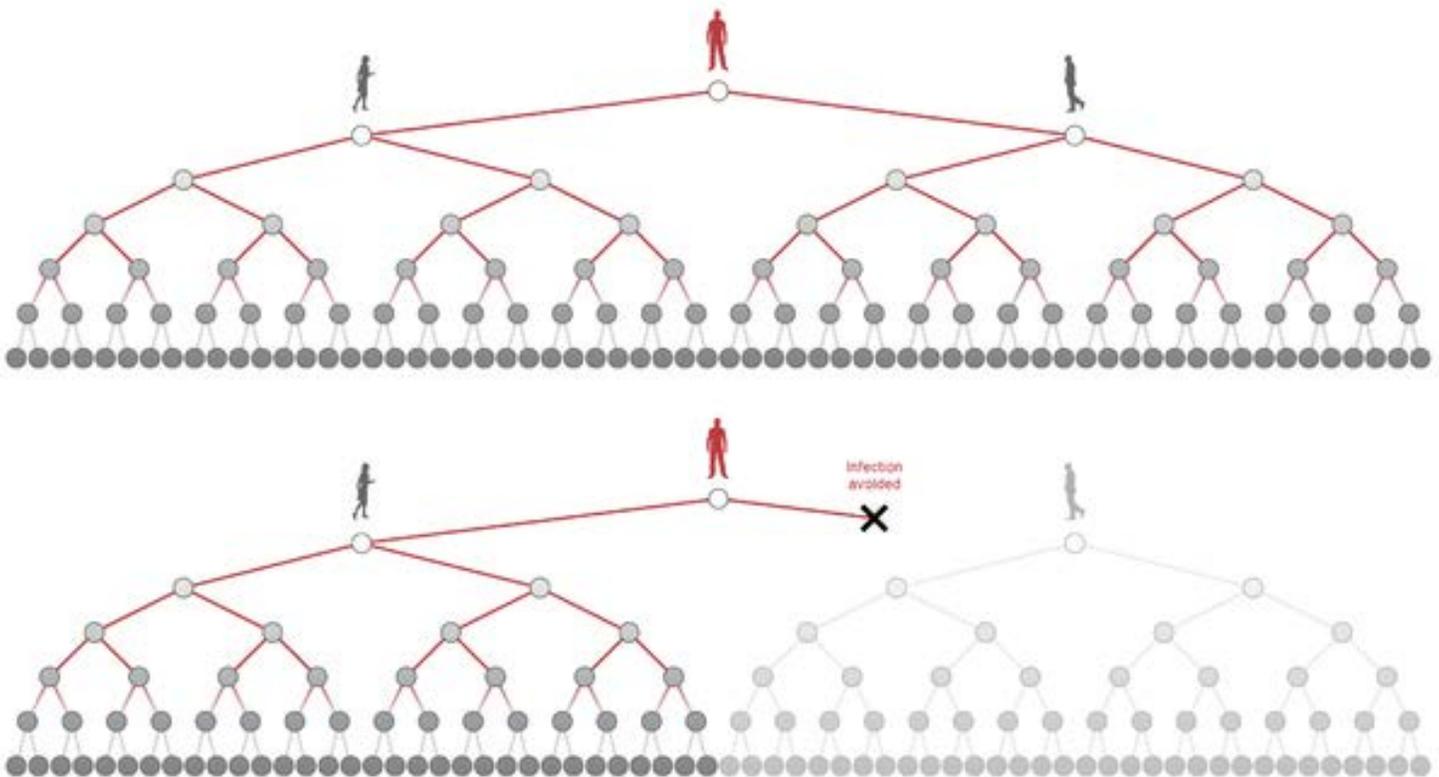
[1] "Non-essential travel" includes travel that is considered tourism or recreational in nature.

[2] "Essential travel" includes: work and study, critical infrastructure support, economic services and supply chains, health, immediate medical care, and safety and security.

Other Safe Work Practices, cont.

- Limit person-to-person contact within the workplace. Assign work "pods" or "cohorts" to limit the number of staff exposed to each other at any one time. To the greatest extent feasible, staff should limit their exposure to other staff outside of their assigned work pods or cohorts.

Coronavirus Chain of Transmission
Without and with limiting social contacts

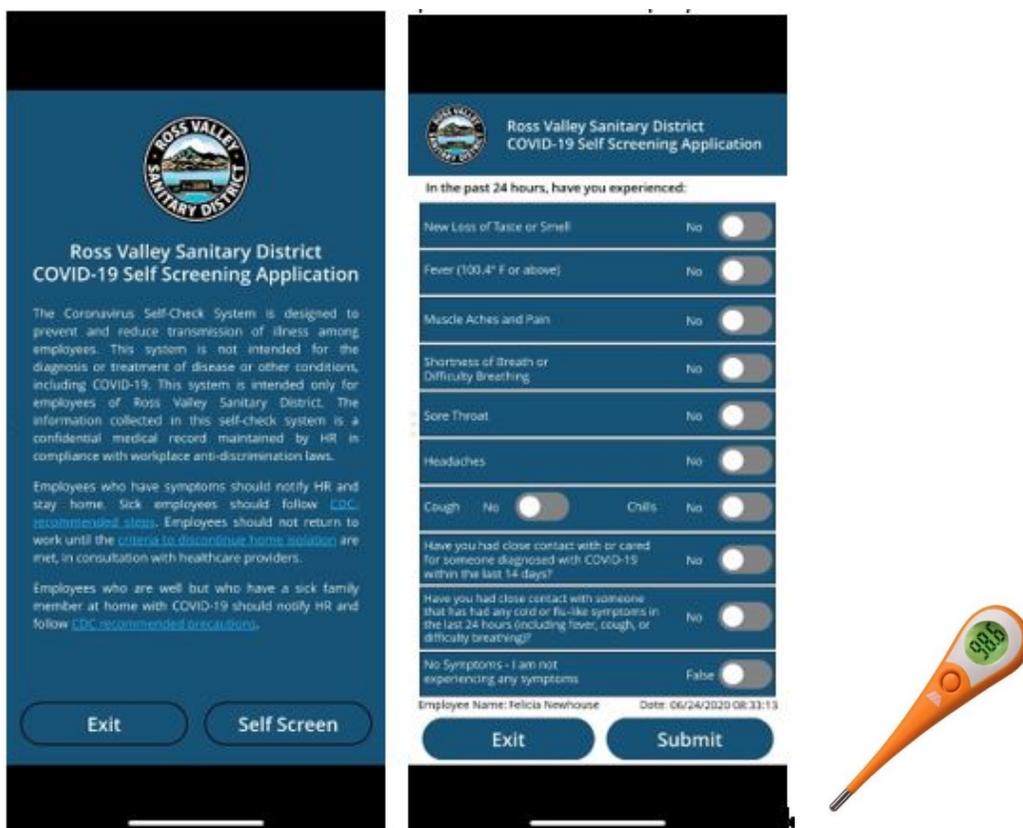


Health Self-Screening

Health self-screenings are required for all staff prior to reporting to work.

Using MS SharePoint PowerApps, the District has designed and implemented a self-screening questionnaire for employees.

Employees have the app installed on their work phone and use the self-screening questionnaire every day before reporting to the workplace. The questionnaire includes a fever check, and employees have been issued individual quick-read thermometers to take their own temperature each day.



The app has been updated to include a question regarding out-of-state travel.

If the employee answers one of the questions that causes a “fail” result, they are directed to contact HR. HR staff, and the employee, are the only ones who have access to the results, pass or fail. HR and the employee confidentially discuss next steps, depending on the specifics of the self-screening answers.

District Communications with Employees

The District will provide employees regular informational updates via remote meetings, phone calls and emails.

District communications may include the following types of information:

- Newly published CDC and OSHA COVID-19 prevention techniques.
- District operational status.
- New employee COVID-19 personnel policies and procedures.
- Changes in hours of operations, work assignments and employee work schedules.
- Essential meeting schedule (i.e. COVID-19 and worker safety trainings).
- Requests for employee involvement to update this Plan.

Procedures to Communicate with Employees Regarding Infection, Contact Tracing and Quarantine

To ensure District employees use appropriate precautions, the District will communicate with them regarding the suspected or confirmed infectious disease status of persons with whom they were exposed during their duties.

Under the Americans with Disabilities Act (ADA), employers are required to maintain the confidentiality of any medical information they receive, including the name of the affected employee. The District will not release any information and is required to maintain the confidentiality of any medical information it receives, including the name of the affected employee.

Upon confirmation of a positive COVID-19 case, the District will conduct contact tracing and quarantining of close contacts of confirmed cases in the workplace. A close contact is someone who spent 15 minutes or more within 6 feet of an individual with COVID-19 infection during their infectious period, which includes the 48 hours, at a minimum, before the individual developed symptoms. Close contacts will be instructed to quarantine at home for 14 days from their last known contact with the worker with COVID-19. Close

contacts should be tested for COVID-19 when possible. Close contacts may return to work prior to 14 days if they receive a written determination from their medical provider.

Contact Tracing Protocol

Contact tracing is the systematic identification of persons who have come into close contact with a confirmed case of COVID-19. RVSD may be required to administer this protocol when it receives notice of a confirmed COVID-19 case in its community, and the local and/or federal Department of Public Health are unable to conduct contact tracing. The Contact Tracing Protocol is included as Appendix A of this Exposure Control Plan.

Procedures to Communicate with County Health Department and OSHA Regarding Infection

The District will notify the Marin County Health and Human Services (County Health Department) after awareness of three or more laboratory-confirmed cases of COVID-19 in the workplace within a two-week period. The Cal/OSHA district office shall be immediately notified but not longer than 8 hours if the person is admitted to the emergency room for severe symptoms. Cal/OSHA prefers calls by phone but will also accept email reports (caloshaaccidentreport@tel-us.com). Details on reporting (www.dir.ca.gov/dosh/coronavirus/Reporting-Requirements-COVID-19.html), contact information for district offices (www.dir.ca.gov/dosh/districtoffices.htm), and the Title 8 section 342 requirement (www.dir.ca.gov/title8/342.html) are available online. The local Cal OSHA number is (707) 649-3700.

Temporary Suspension of Operations due to COVID-19 Infection in the Workplace

The District may elect to voluntarily suspend operations at one or more of its locations (2960 Kerner Blvd., 2000 Larkspur Landing Circle, or Pump Station 13 in Bon Air Center, Greenbrae) when a case of COVID-19, exposure to COVID-19, or an outbreak (i.e., three or more cases) has occurred in the workplace. This will allow investigation of the exposure, thorough cleaning and disinfection, and an adequate amount of quarantining to reduce risk of transmission to an acceptable level, while still providing essential services to the community.

California Department Of Public Health Guidance: Determining When It Is Appropriate For Cases Or Contacts Of Cases To Return To Work

Minimum Criteria for Return to Work <i>(As of September 18, 2020)</i>		CDC Reference Page <i>(The most recent CDC guidance should be consulted prior to allowing the worker to return to work)</i>
<p>Symptomatic Positive</p> <p>Workers with symptoms who are laboratory confirmed to have COVID-19</p>	<p>At least 10 days have passed <i>since symptoms first appeared</i>; and at least 24 hours have passed <i>since last fever</i> without the use of fever-reducing medications; and symptoms (e.g., cough, shortness of breath) have improved.</p>	<p>For worker cases who did not require hospitalization: www.cdc.gov/coronavirus/2019-ncov/hcp/disposition-in-home-patients.html</p> <p>For worker cases who require hospitalization: www.cdc.gov/coronavirus/2019-ncov/hcp/disposition-hospitalized-patients.html</p>
<p>Asymptomatic Positive</p> <p>Workers who never had symptoms and are laboratory confirmed to have COVID-19</p>	<p>A minimum of 10 days have passed since the date of their first positive COVID-19 test. If they develop symptoms, then the criteria for laboratory confirmed cases with symptoms apply.</p>	<p>www.cdc.gov/coronavirus/2019-ncov/hcp/disposition-in-home-patients.html</p>
<p>Symptomatic Negative</p> <p>Workers who had symptoms of COVID-19 but test result returned negative</p>	<p>Use the same criteria for return to work as laboratory confirmed cases.</p>	

Minimum Criteria for Return to Work <i>(As of September 18, 2020)</i>		CDC Reference Page <i>(The most recent CDC guidance should be consulted prior to allowing the worker to return to work)</i>
<p>Asymptomatic Negative</p> <p>Workers who never had symptoms but were tested due to close contact with a laboratory-confirmed case patient and were negative</p>	<p>Workers should quarantine at home for 14 days after the last known close contact with the case patient. Symptoms can develop even after testing negative within 14 days after exposure. The LHD may consider allowing earlier return to work only for a worker in a critical infrastructure industry in which the essential operations of the workplace would be compromised by quarantine of the worker and no alternate staff can perform the same role.*</p>	
<p>Symptomatic Untested</p> <p>Workers who had symptoms of COVID-19 but were not tested</p>	<p>Testing is highly recommended. If the worker cannot be tested, use the same criteria for return to work as laboratory confirmed cases.</p>	
<p>Asymptomatic Untested</p> <p>Workers who had close contact to a laboratory-confirmed case patient at work, home, or in the community and</p>	<p>Workers should be quarantined at home for 14 days after the last known close contact with the case patient. Testing is highly recommended; if testing has not occurred, the LHD may consider allowing a worker who had close contact to a confirmed case to continue to work only in a</p>	<p>www.cdc.gov/coronavirus/2019-ncov/hcp/disposition-in-home-patients.html</p> <p>www.cdc.gov/coronavirus/2019-ncov/community/critical-workers/implementing-safety-practices.html</p>

Minimum Criteria for Return to Work <i>(As of September 18, 2020)</i>		CDC Reference Page <i>(The most recent CDC guidance should be consulted prior to allowing the worker to return to work)</i>
<p>do not have symptoms.</p> <p>OR</p> <p>Workers who refuse or are unable to be tested after close contact with a laboratory-confirmed case, despite recommendation for testing from LHD or healthcare provider, and do not have symptoms.</p>	<p>critical infrastructure industry in which the essential operations of the workplace would be compromised by quarantine of the worker and no alternate staff can perform the same role.*</p> <p>Workers who develop symptoms of COVID-19 while in quarantine should contact their healthcare provider. Even if they are not tested, the same criteria for return to work should be used as laboratory-confirmed cases.</p>	

COVID-19 Testing After Infection

If a positive case of COVID-19 is identified for a District employee, until there are no new COVID-19 cases detected in the workplace for 14 days, the District will provide for COVID-19 testing for all employees at the exposed workplace except for employees who were not present during the period of an infection. COVID-19 testing is provided at no cost to employees during employees' working hours. The employee is responsible for scheduling the test and the District has furnished employees information from Marin County Health and Human Services about free testing locations in Marin County. All employees in the exposed workplace will be tested and then tested again one week later. The District will provide COVID-19 testing of employees who remain at the workplace at least once per week, or more frequently if recommended by the local health department, until this section no longer

applies when 14 days have passed since the most recent COVID-19 positive case identification.

Training

The District will provide trainings to all employees about this Plan. Trainings may be conducted in-person (with limited number of persons), or via remote meetings.

The trainings will include an opportunity for employees to ask questions. If employees are absent on the day of their scheduled training, the District will provide a make-up training.

Training includes the following:

- An explanation of the District's Exposure Control Plan, how the employee can obtain a copy of the written plan, and how they can provide input as to its effectiveness (i.e. electronically through an employee webpage or through email).
- A general explanation about COVID-19.
- How to identify signs and symptoms of COVID-19.
- An explanation of the modes of COVID-19 transmission and applicable source control procedures.
- An explanation of the basis for selection of personal protective equipment, its uses and limitations, and the types, proper use, location, removal, handling, cleaning, decontamination, and disposal of the items of personal protective equipment employees will use.
- An explanation of the procedure to follow if exposed to COVID-19, including the method of reporting, and any necessary medical follow-up.

APPENDIX A

RVSD CONTACT TRACING PROTOCOL

Contact Tracing Protocol

Contact tracing is the systematic identification of persons who have come into close contact⁴ with a confirmed case of COVID-19.⁵ Due to the increased number of cases, RVSD may be required to administer this protocol when it receives notice of a confirmed COVID-19 case in its community, and the local and/or federal Department of Public Health are unable to conduct contact tracing.

1. Initial Protocol Considerations

- This is a confidential process. **The name of the individual who has tested positive shall not be disclosed to a close contact**, or any other individual or entity outside of the Department(s) of Public Health, nor should sufficient details be provided that makes their identity readily identifiable.
- Protocol administered through Human Resources, Organization’s health officer or other designated individual (“Tracing Officer”).
- Protocol is administered in coordination with the UPDATED *RVSD Exposure Control Plan*, dated _____, 2021.

2. Upon notification of a confirmed COVID-19 case at RVSD

- Contact your local Department of Public Health (DPH) to inform it of the confirmed case and determine if it will conduct the contact tracing process. If the local DPH does not return the Organization’s call within three (3) hours, contact the State Department of Public Health.
- If the local DPH is going to conduct the tracing, provide it with the confirmed case’s contact information.
- If not, the Organization’s Tracing Officer should confirm with the local DPH that Organization will conduct contact tracing in accordance with this Protocol.

3. Initiate Contact Tracing

- Contact the confirmed COVID-19 case and complete the *Contact Tracing Reporting Form*, including identifying all individuals the confirmed case came in close contact with at RVSD during their period of infectivity.⁶
- Contact those that had close contact with the confirmed case during the period of infectivity. Indicate: (a) that they have been identified as coming in close contact with a confirmed case of COVID-19; and (b) the date and location of the close contact.

⁴ Defined as (a) being within approximately 6 feet of a COVID-19 case for a prolonged period of time (at least 15 minutes); or (b) having direct contact with infectious secretions of a COVID-19 case (e.g., being coughed on).

⁵ Individuals who have tested positive for the virus that causes COVID-19.

⁶ Defined as the date the COVID-19 patient developed symptoms up to the time the patient went into isolation.

- Instruct close contact(s) to contact their health care provider and self-quarantine for up to 14 days or as directed by their health care provider.
- Inform close contact(s) that upon completing their period of self-quarantine they will require a doctor's note indicating they are cleared to return to work.
- Inform local DPH of notification to close contacts. Provide information to local DPH as requested.

Contact Tracing Reporting Form

(1) Confirmed Case Information

Name	
Age	
Telephone	
Email	
Date last onsite or at Organization event	
Date of first symptoms (infectivity)	
Date of positive test results	
Identify who conducted the testing	

(2) Close Contacts Identified by the Confirmed Case

Name of close contact	
Date of close contact	
Location of close contact	
Length of close contact	

Name of close contact	
Date of close contact	
Location of close contact	
Length of close contact	

Name of close contact	
Date of close contact	
Location of close contact	
Length of close contact	

(3) Close Contact Information Obtained by Tracing Officer

Name of close contact	
Inform of close contact with confirmed case	<input type="checkbox"/>
Instruct to contact health care provider	<input type="checkbox"/>
Instruct to self-quarantine up to 14 days or as directed by health care provider	<input type="checkbox"/>
Inform of written medical clearance to return to work	<input type="checkbox"/>
Experiencing symptoms (sore throat, cough, body aches, shortness of breath)?	<input type="checkbox"/> Yes <input type="checkbox"/> No

Name of close contact	
Inform of close contact with confirmed case	<input type="checkbox"/>
Instruct to contact health care provider	<input type="checkbox"/>
Instruct to self-quarantine up to 14 days or as directed by health care provider	<input type="checkbox"/>
Inform of written medical clearance to return to work	<input type="checkbox"/>
Experiencing symptoms (sore throat, cough, body aches, shortness of breath)?	<input type="checkbox"/> Yes <input type="checkbox"/> No

Name of close contact	
Inform of close contact with confirmed case	<input type="checkbox"/>
Instruct to contact health care provider	<input type="checkbox"/>
Instruct to self-quarantine up to 14 days or as directed by health care provider	<input type="checkbox"/>
Inform of written medical clearance to return to work	<input type="checkbox"/>
Experiencing symptoms (sore throat, cough, body aches, shortness of breath)?	<input type="checkbox"/> Yes <input type="checkbox"/> No