

# **COVID-19**

## **Prevention Program**

*(Non-Emergency Plan)*



## **COVID-19 Prevention Program (CPP)**

### ***(Non-Emergency Plan)***

#### **Introduction**

The Leucadia Wastewater District (LWD) CPP has been developed to help reduce employees' risk of exposure to the SARS-CoV-2 virus that may occur in the workplace. This program is supplemental to LWD's Pandemic Preparedness Plan and its Injury and Illness Prevention Program (IIPP). Recommendations from the Centers for Disease Control and Prevention have been incorporated into this plan as well as the Cal/OSHA's established non-emergency "COVID-19 Prevention" standards in Title 8, Sections 3205 – 3205.4, of the California Code of Regulations. The program will be continuously implemented until February 3, 2025. This program is designed to be flexible, so LWD can adjust to changing conditions and recommendations from the World Health Organization, Centers for Disease Control and Prevention, and the California Department of Public Health.

#### **Authority and Responsibility**

The General Manager has overall authority and responsibility for implementing the provisions of the CPP in the workplace. In addition, all managers and supervisors are responsible for implementing and maintaining the CPP in their assigned work areas and for ensuring employees receive answers to questions about the program.

All employees are responsible for using and implementing safe work practices, following all directives, policies and procedures, and assisting in maintaining a safe work environment.

I, Paul J. Bushee, General Manager certify the COVID-19 Prevention Program for the Leucadia Wastewater District has been reviewed and adopted.

  
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Signature

#### **Identification, Evaluation and Prevention Controls**

COVID-19 is treated as an airborne infectious disease and a potential hazard in any workplace. All employees are treated as potentially infectious, regardless of symptoms, vaccination status, or negative COVID-19 test results. When determining measures to prevent COVID-19 transmission, identifying and correcting COVID-19 hazards in LWD's workplace, LWD will implement the following:

- Management will review applicable orders and guidance from the State of California, Cal/OSHA, CDC and the local health department related to COVID-19 hazards and prevention.
- Provide face coverings when required by CDPH.
- Notify affected employees of COVID-19 cases.
- Provide COVID-19 tests at no cost to employees who had close contact in the workplace.
- Provide this policy to all employees and train employees on LWD's COVID-19 policy.
- All employees, consultants and contractors working at any LWD building must self-screen before starting their workday. If employees or contractors experience symptoms of illness at any time

during the workday, they must return home immediately and contact their supervisors.

- Evaluate existing COVID-19 prevention controls in the workplace and the need for different or additional controls. COVID-19 prevention controls may include, but not limited to:
  - ✓ Remote work,
  - ✓ Physical distancing,
  - ✓ Reducing population density indoors,
  - ✓ Moving indoor tasks outside,
  - ✓ Implementing separate shifts and/or break times,
  - ✓ Restricting access to work areas,
  - ✓ Not sharing PPE (e.g., gloves, goggles and face shields),
  - ✓ Encouraging and allowing employees to wash their hands,
  - ✓ Providing employees with an effective hand sanitizer,
  - ✓ Ensure each Vector Combination truck has been fitted with water tanks that function as hand washing stations,
  - ✓ Ensure cleaning supplies, such as, disinfected wipes, are available in LWD vehicles, common areas and the lunchroom for employees to wipe down equipment, desks or surfaces after use,
  - ✓ Opening windows to allow fresh air to flow through the office(s), and
  - ✓ Replacing all HVAC filters regularly.

### **Procedures for Responding to COVID-19 Cases in the Workplace Include:**

*Management may amend this portion of the program by notifying staff in writing, without updating the documented program. Any amendments will be maintained by the Administrative Services Supervisor.*

Employees that test positive with COVID-19 symptoms will not return to work during the infectious period until all the following have occurred:

- ✓ At least 5 days have passed since COVID-19 symptoms first appeared, **and**
- ✓ At least 24 hours have passed since a fever of 100.4 or higher has resolved without the use of fever-reducing medications; **and**
- ✓ COVID-19 symptoms have improved; **and**
- ✓ That employee tests negative for COVID-19.

For COVID-19 cases without COVID-19 symptoms, employees will not return to work during the infectious period until all the following has occurred:

- ✓ At least 5 days have passed since the date of specimen collection of their first positive COVID-19 test.
- ✓ A negative COVID-19 test is required for an employee to return to work.

Regardless of a previous infection, or lack of COVID-19 symptoms, a COVID-19 case must wear a face covering in the workplace until 10 days have passed since the date that COVID-19 symptoms began or, if the person did not have COVID-19 symptoms, from the date of their first positive COVID-19 test.

If LWD has a COVID-19 case in the workplace, LWD will follow the Centers for Disease Control's (CDC)

guidelines and implement the following cleaning and disinfection measures for frequently touched surfaces:

- If possible, office windows will be opened to allow for air circulation in the area.
- If common areas such as bathrooms or shared items have already been routinely cleaned, no additional action is needed.
- Shared work spaces will be numbered and a checklist provided nearby indicating when/if said station has been disinfected.

### **Close Contact Cases**

*Management will continue to review current [California Department of Public Health \(CDPH\)](#) guidance for persons who had close contacts, including any guidance regarding quarantine or other measures to reduce transmission.*

Employees who had a close contact, but **never** developed symptoms must get tested 5 days after exposure. If they test positive, they should follow isolation procedures above.

### **Notice of COVID-19 Cases**

Employees and independent contractors who had a close contact, as well as any employer with an employee who had a close contact, will be notified as soon as possible, and in no case longer than the time required to ensure that the exclusion requirements listed in the previous section are met. LWD will communicate to employees and/or independent contractors by:

- Providing a notice of COVID-19 case, in a form readily understandable to all that maybe affected. The notice will be given to all employees, employers, and independent contractors at the worksite.

### **Face Coverings**

*Management may amend this portion of the program by notifying staff in writing, without updating the documented program. Any amendments will be maintained by the Administrative Services Supervisor.*

LWD will provide clean, undamaged face coverings and ensure they are properly worn by employees when:

- Required by orders from California Department of Public Health (CDPH) or the local health department, or
- During any outbreaks, or
- An employee(s) returns to work after having COVID-19 until 10 days have passed since the date of when their COVID-19 symptoms began or, if the person did not have COVID-19 symptoms, from the date of their positive COVID-19 test, or from the date of a close contact.
- Face coverings should be worn when outdoors and less than six feet away from another person, including visitors, vendors, delivery personnel, contractors and where required by orders from the California Department of Public Health (CDPH) or local health department. LWD will provide face coverings if an employee, visitor, vendor or contractor does not have one at the time of their visit.
- LWD will not prevent any employee from wearing a face covering when it is not required unless it would create a safety hazard, such as interfering with the safe operation of equipment.
- Disposable masks should be used for single day use. Cloth masks should be washed frequently and must be kept clean by employee.

## Investigating and Correction of COVID-19 Hazards

Procedures to investigate COVID-19 cases in the workplace include:

- ✓ Completing the Investigating COVID-19 Cases form (Appendix A), which includes determining the date and time a COVID-19 case first had one or more COVID-19 symptoms.

Employees who had potential COVID-19 exposure in the workplace will be:

- Offered COVID-19 testing at no cost during their working hours for all employees.
- Notified as soon as possible of District knowledge of a COVID-19 case that people at the worksite may have been exposed to COVID-19. This notice will be readily understandable to employees and provided to:
  - all employees,
  - independent contractors
  - other employers at the worksite during the high-risk exposure period

### Correction of COVID-19 Hazards

Unsafe or unhealthy work conditions, practices or procedures will be documented on the IIPP's Report of Unsafe Condition or Practice form, and corrected in a timely manner based on the severity of the hazards, as follows:

- Inspection forms with the corrected hazards must be forwarded by the Managers/Supervisors to Human Resources.
- Hazards identified as a result of a periodic worksite inspection or during normal operations must be corrected by the supervisor in control of the work area, or by cooperation between the department in control of the work area and the supervisor of the employees working in that area. Supervisors of affected employees are expected to correct unsafe conditions as quickly as possible after discovery of a hazard, based on the severity of the hazard. Specific procedures that can be used to correct hazards include but are not limited to the following:
  - Closing areas off when being disinfected.
  - Stopping unsafe work practices and providing retraining and documentation on proper procedures before work resumes.
  - Reinforcing and explaining the need for and/or proper use of personal protective equipment and ensuring its availability.

## Reporting, Recordkeeping, and Access

It is LWD's procedure to:

- Use the *Appendix A: Investigating COVID-19 Cases* form to keep a record of and track all COVID-19 cases. The information will be made available to employees, or as otherwise required by law, with personal identifying information removed.
- Report information about COVID-19 cases at LWD's workplace to the San Diego County Health Services, when required by law and provide any related information requested by the local health department.
- Report information about COVID-19 cases at LWD's workplace to LWD's workers compensation administrator within 3 days of the known case(s).
- Maintain and retain records for two years beyond the period in accordance with CCR, Title 8,

sections 3205, 3205.1, 3205.2, 3205.3 and Labor Code section 6409.6.

- Make LWD's written CPP available at the workplace to employees and to representatives of Cal/OSHA immediately upon request.
- Employee(s) vaccination status and all other CPP related forms are confidential and will be maintained as separate confidential medical records within the Human Resources department.

### **Training and Instruction**

LWD provides effective COVID-19 employee training and instructions via online, web-based (virtual) training software and in person, and will be provided to new employee(s), all employees, or when:

- this CPP was first established.
- given a new job assignment involving COVID-19 hazards and they have not been previously trained.
- new COVID-19 hazards are introduced.
- LWD is made aware of new or previously unrecognized COVID-19 hazards.
- Supervisors need to familiarize themselves with the COVID-19 hazards to which employees under their immediate direction and control may be exposed.

## **Additional Consideration #1**

This section will be effective when three or more employee COVID-19 cases within an exposed group visited the workplace during their infectious period at any time during a 7-day period, unless a CDPH regulation or order defines outbreak using a different number of COVID-19 cases and/or a different time period.

### **Multiple COVID-19 Infections and COVID-19 Outbreaks**

This section of CPP will stay in effect until there are no new COVID-19 cases detected in the LWD workplace for a 7-day period.

#### **Exclude from Work**

All COVID-19 cases, as well as employees who had close contacts but do not take a COVID-19 test, will be sent home until the infectious period has ended.

#### **COVID-19 Testing**

LWD will immediately provide COVID-19 testing available at no cost to our employees within the exposed group during employees' paid time, and continue to make test available to employees at least weekly until there are one or fewer new COVID-19 cases detected in the exposed group for a 14-day period.

Employees who had close contact and remain at work will be required to take a COVID-19 test within three to five days after the close contact. Those who test positive for COVID-19 will be sent home for 5 days and a negative COVID-19 test is required for that employee to return to work.

#### **Face Coverings**

Employees in the exposed group, will wear face coverings when indoors, or when outdoors and less than six feet from another person, unless one of the exceptions in our CPP applies.

#### **Respirators**

Employees will be notified of their right to request and receive a respirator for voluntary use, as stipulated in our CPP.

### **COVID-19 investigation, review, and hazard correction**

LWD will perform a review of potentially relevant COVID-19 policies, regulations, procedures and controls, and implement changes as needed to prevent further spread of COVID-19 when this addendum initially applies and periodically thereafter. The investigation, review, and changes will be documented and include:

- Our leave policies and practices and whether employees are discouraged from remaining home when sick.
- Our COVID-19 testing policies.
- Insufficient supply of outdoor air to indoor workplaces.
- Insufficient air filtration.
- Insufficient physical distancing.
- Any changes implemented to reduce the transmission of COVID-19 based on the investigation and review, which may include:

- Moving indoor tasks outdoors or having them performed remotely.
- Increasing the outdoor air supply when work is done indoors.
- Improving air filtration.
- Increasing physical distancing to the extent feasible.
- Requiring respiratory protection in compliance with CCR, Title 8 section 5144.
- Other applicable controls.

### **Ventilation**

LWD will filter recirculated air with Minimum Efficiency Reporting Value (MERV) 13 or higher efficiency filters, if compatible with the ventilation system. If MERV-13 or higher filters are not compatible, LWD will use filters with the highest compatible filtering efficiency. LWD will also evaluate whether portable or mounted High Efficiency Particulate Air (HEPA) filtration units or other air cleaning systems would reduce the risk of transmission and, if so, implement their use to the degree feasible.

These ventilation requirements will continue to be implemented after the outbreak has passed and CCR, Title 8 section 3205.1 is no longer applicable.

### **Major Outbreaks**

The following will be done while CCR, Title 8 section 3205.1 applies if 20 or more employee COVID-19 cases in an exposed group visited the worksite during their infectious period within a 30-day period:

- Exclude COVID-19 cases as well as employees in the exposed group who do not take a COVID-19 test.
- Immediately ensure that all employees in the exposed group who remain at work are tested for COVID-19 at least twice weekly until there are one or fewer new COVID-19 cases detected in the exposed group for a 14-day period. Employees in the exposed group that do not take the COVID-19 test will be sent home until our return-to-work criteria have been met.
- Report the outbreak to Cal/OSHA.
- Provide respirators for voluntary use to employees in the exposed group, encourage their use, and train employees according to CCR, Title 8 section 5144(c)(2) requirements.
- Any employees in the exposed group who are not wearing face coverings as required will be sent home until the infectious period has ended.

Methods of physical distancing include:

- Telework or other remote work arrangements.
- Reducing the number of persons in an area at one time, including visitors.
- Visual cues such as signs and floor markings to indicate where employees and others should be located or their direction and path of travel.
- Staggered arrival, departure, work, and break times.
- Adjusted work processes or procedures, such as reducing production speed, to allow greater distance between employees.

When it is not feasible to maintain a distance of at least six feet, individuals will be as far apart as feasible.



## **Appendix A: Investigating COVID-19 Cases**

All personal identifying information of COVID-19 cases or symptoms will be kept confidential, with the exception of unredacted information on COVID-19 cases that will be provided immediately upon request to the local health department, CDPH, Cal/OSHA, the National Institute for Occupational Safety and Health (NIOSH), or as otherwise required by law.

**Date:**

**Name of person conducting the investigation:**

**Name of COVID-19 case (employee or non-employee\*) and contact information:**

**Occupation (if non-employee\*, why they were in the workplace):**

\*If LWD is made aware of a non-employee COVID-19 case in LWD's workplace

**Names of employees/representatives involved in the investigation:**

**Date investigation was initiated:**

**Locations where the COVID-19 case was present in the workplace during the high-risk exposure period, and activities being performed:**

**Date and time the COVID-19 case was last present and excluded from the workplace:**

**Date of the positive or negative test and/or diagnosis:**

**Date the case first had one or more COVID-19 symptoms, if any:**

**Information received regarding COVID-19 test results and onset of symptoms (attach documentation):**

Summary determination of who may have had a close contact with the COVID-19 case during the high-risk exposure period. Attach additional information, including:

- The names of those found to be in close contact.
- When testing was offered, including the results and the names of those that were exempt from testing because they were infected within the prior 30 days.

Notice will be given by the General Manager via electronic means (within one business day, in a way that does not reveal any personal identifying information of the COVID-19 case) of the potential COVID-19 exposure to:

1. All employees who were in close contact.

**What were the workplace conditions that could have contributed to the risk of COVID-19 exposure?**

**What could be done to reduce exposure to COVID-19?**