



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

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 Governor Executive Order:

<https://covid19.ca.gov/img/Executive-Order-N-33-20.pdf>

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/>

Background

COVID-19 is a new disease and the CDC continues to learn about how it is spread. At this moment in time, 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

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.

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.
- Communicating Employee COVID-19 cases to health authorities in accordance with federal and state laws.
- Updating this Plan to incorporate newly published COVID-19 information.

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

Exposure - Risk Assessment (Site, Job, Worker)

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, including those at wastewater treatment facilities. OSHA recommends that employers ensure workers follow routine practices to prevent exposure to wastewater, including using the engineering and administrative controls, safe work practices, and PPE normally required for work tasks when handling untreated wastewater.

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, locations are in low to medium risk exposure categories.

Low Exposure Risk – Work Conditions

Low exposure risk (caution) jobs are those that do not require contact with people known to be, or suspected of being, infected with COVID-19 nor frequent close contact with (i.e., within 6 feet of) the general public. District office workers in this category have no occupational contact with the general public and minimal contact with other District employees.

Medium Exposure Risk- Work Conditions

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. In areas where there is ongoing community transmission such as Marin County, District field workers may have contact with the general public (e.g., schools, high-population-density work environments, some high-volume retail settings).

Engineering Controls

There is no evidence to suggest that additional, COVID-19-specific protections are needed for employees involved in wastewater management operations, including those at wastewater treatment facilities. Wastewater treatment plant operations should ensure workers follow routine practices to prevent exposure to wastewater, including using the engineering and administrative controls, safe work practices, and PPE normally required for work tasks when handling untreated wastewater.²

² <https://www.osha.gov/SLTC/covid-19/controlprevention.html> (April 4, 2020)

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.

For low risk exposure jobs, the CDC recommends that employers such as the District continue to use its existing health and safety practices to prevent the spread of COVID-19.³

For medium risk exposure jobs, the District will implement the following measures wherever possible to control worker exposure to COVID-19:

Field Work Setting:

- Limit entrants to confined spaces and excavations.
- Size worksites to allow distancing between employees.
- Create defensible field worker zones (6ft diameter radius).
- All personnel are required to wear a face covering anywhere the public or other coworkers are present.

Office Work Setting:

- 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.
- Increase ventilation rates in office environments.
- Close the office to the public in accordance with State and local health orders.
- Establish electronic mail and telephone customer service processes.
- Provide hand sanitizers for employee and visitors.
- All personnel are required to wear a face covering when working in or walking through common areas such as hallways, stairways, or parking areas, and anywhere the public or other coworkers are regularly present.

Administrative Controls

Administrative controls are changes in work procedures such as written safety policies, rules, supervision, schedules, and training with the goal of reducing the duration, frequency, and severity of exposure to hazardous situations such as COVID-19.

³ See *Guidance on Preparing Workplaces for COVID-19* OSHA 2990-03-2020, at 21

To prevent the spread of COVID-19 and to protect its workers the District has considered and will carry out the following changes in work procedures where appropriate:

- Allow flexible workplace locations.
- Update leave policies in accordance with state and federal legislation.
- Facilitate flexible work hours (e.g. staggered work shifts).
- Allow teleworking for certain job functions by entering into telecommuting agreements with employees whose job descriptions are conducive to being performed remotely.
- Discontinue non-essential travel.
- Establish employee-based Remote Meeting Protocols.
- 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 participants to follow CDC social distancing guidelines.

Safe Work Practices

To further reduce exposure to COVID-19, the District will actively engage in the following safe practices at the Kerner Office and Larkspur Landing facilities:

- Follow CDC social distancing guidelines to maintain a minimum 6 feet distance between employees and between people visiting the office.
- Ensure that adequate cleaning supplies are available.
- Routinely clean all frequently touched surfaces in the workplace, such as workstations, countertops, and door handles.
- Provide employee with disposable wipes or equivalent cleaning supplies to clean commonly used surfaces (for example, doorknobs, keyboards, remote controls, desks).
- Remind employees to cover their mouths and noses when coughing and sneezing, using crook of their elbow instead of hands.
- Provide employees with tissues and waste bins lined with a plastic bag so that they can be emptied without touching the contents.
- Instruct employees to clean their hands frequently with soap and water for at least 20 seconds.

- Encourage workers not to share their phones, computers, desks, tools and equipment.
- Disinfect tools and equipment between users.
- Wipe down vehicle handles and interior surfaces after every use.
- Avoid shaking hands; nod or wave instead.
- Require employees to stay at home if they are sick.
- Require employees who develops flu-like symptoms (i.e. cough, shortness of breath, fever) while at work, to go home immediately. If there is any reason, an employee suspects that they may have been in contact with COVID-19, they should follow CDC and local health officials' procedures.
- Discontinue non-essential in-person meetings.
- Use hand sanitizers or wash hands immediately after exchanging any documents with employees and office visitors.

Personal Protective Equipment (PPE)

Based on current information published by the CDC, wastewater and sewage workers should use standard practices, practice basic hygiene precautions, and wear personal protective equipment (PPE) as prescribed for current work tasks.⁴

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.

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.

Absenteeism

⁴ <https://www.cdc.gov/coronavirus/2019-ncov/php/water.html>; Page last reviewed: April 3, 2020
Content source: National Center for Immunization and Respiratory Diseases (NCIRD), Division of Viral Diseases

The District has developed procedures to maintain critical operations when necessary because of employee absences resulting from personal illness, caring for ill family members, and dismissal of early childhood programs and K-12 schools.

The District will implement the following actions:

- Cross-train employees to carry out essential functions so the workplace can operate when essential staff are out.
- Identify alternative providers through mutual aid, contracts to support operations.
- Identify personnel backfill options (reinstate retirees, hire new employees, hire from temporary agencies, utilize personnel from other agencies, etc.).
- Develop priority operations based on critical operating functions.
- Prepare to temporarily suspend certain non-essential work.

District Communications with Employees

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

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 and Other Employers Regarding Infection

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.

The District will also communicate this status with other employers whose employees were also exposed to the individual, such as those involved with transportation or care of the patient.

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 and the means by which 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 electronic mail).
- 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 the incident, and the medical follow-up necessary.