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

California Water Environment Association (CWEA)

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. 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)
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

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.

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.

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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.
Exposure Control for Field 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 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.

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.
- 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.
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.

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**

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.
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.