



SteelSummit



MAGIC★STEEL

INFECTIOUS DISEASE PREVENTION PLAN

COVID - 19



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1. PURPOSE AND INTENT

The purpose of this procedure is to provide a framework for a consistent response and strategy for epidemic and pandemic preparedness while protecting employees and making sure everyone stays safe, healthy and confident about returning to work.

This procedure constitutes a series of best practices, dealing with various Health, Safety, Environmental, and Public Health focused measures, designed to enhance the health and well-being of employees working in an outbreak/epidemic or pandemic environment.

The protocols set out in this document constitute recommendations, based on guidance provided by Occupational Safety and Health Administration (OSHA), World Health Organization (WHO), the Centers for Disease Control and Prevention (CDC), as well as various country specific public health authorities.

2. MANAGEMENT RESPONSE TEAM

The Management Response Team (MRT) will consist of members of management, supervisors, and key employees who have the following roles & responsibilities.

A. Senior Leadership Team

- i. Policy review and approval;
- i. Emergency planning;
- ii. Management review reports;
- iii. Information collection, consolidation, and reporting;
- iv. Customer, supplier, and contractor communications;
- v. Business risk evaluation;
- vi. Media/Social Media/ Website;

B. Human Resources / EHS

- i. Create policies and processes;
- ii. Internal Communication (Communication/Education/Training);
- iii. Interface with State and Local governments;

C. Production

- i. Daily checks (Social Distancing, Cleaning/Disinfecting /PPE);
- ii. Front line communication (Communication/Education/Training);
- iii. Workforce Scheduling (Social Distancing);
- iv. Establish inventory requirements for PPE;

- v. Ensure appropriate supplies for cleaning, disinfecting, and PPE;
- vi. Manage risk from shipping and receiving materials;

3. PERSONAL PROTECTIVE EQUIPMENT REQUIREMENTS

Depending on the assigned task, employees PPE requirements may change. The following must be established, assigned, and communicated with all appropriate parties.

- A. PPE Requirements listed below are in addition to the normally required PPE.
- B. An adequate Inventory level of PPE and cleaning supplies must be maintained based on the facilities workforce and footprint.
- C. Instructions will be given to the employees on the proper utilization of required PPE, which will include no sharing between employees.
- D. A procedure will be developed for collection and cleaning of reusable PPE such as uniforms, visitor’s safety glasses, hardhats, vests, etc.
- E. A procedure for disposal of non-reusable employee PPE will be developed.

	<u>Surgical Mask or Face Covering</u>	<u>Gloves (nitrile)</u>	<u>Protective Goggles OR Safety Glasses AND Face Shield</u>	<u>Protective Gown OR Cloth Coverall</u>	<u>N95 Respirator</u>
Member of Emergency Response Team in continuous close contact with an employee who has become ill at work	Required	Required	Required	Required	Required
Employees who become ill at work	Required				
Employee who has recovered from COVID and has residual cough	Required				
General Cleaning	Required	Required	Optional	Optional	
Individual conducting on-site thermal scanning for employees who do not know their temperature	Required	Optional	Optional	Optional	
Employees who must work in close quarters (< 6ft or 2m)	Required **				

	<u>Surgical Mask or Face Covering</u>	<u>Gloves (nitrile)</u>	<u>Protective Goggles OR Safety Glasses AND Face Shield</u>	<u>Protective Gown OR Cloth Coverall</u>	<u>N95 Respirator</u>
Shipping & Receiving (interaction with drivers)	Required **				
Decontamination of affected areas (Follow chemical specific requirements for PPE)	Required	Required	Required	Required	Required
Essential Visitors	<u>Required</u> if in close quarters (less than 6 feet) - (Conference Rooms -Enclosed offices)				
Offices	<u>Required</u> when in administrative or production offices except when sitting at the workstation that is separated by a wall or partition taller than the occupant of the workstation. **				
Off-site Visits (Customer Sites)	Follow Customer Site Requirements				
Company Travel (Planes, Trains, Automobiles)	Follow Travel Request Procedure Recommendations				

*** For those employees who have been vaccinated for COVID and it has been more than 2 weeks after the 2-shot vaccine or 1 shot vaccine, the Mask requirements for performing this task does not apply unless they are closer than 6 feet from another employee, visitor, or contractor.*

Mask mandate for visitors and guests will still apply whether or not they have been vaccinated for COVID.

4. SOCIAL DISTANCING PROTOCOLS

In order to decrease the transmission of infectious disease, we will practice physical and/or social distancing when the threat level requires it. In practice this means taking

steps to limit the number of people our employees come into close contact with, reducing the risk of transmitting the virus.

A. Employee, Visitor, Contractor, or Service Provider will:

- i. Staying 2m/6ft away from others as a normal practice;
- ii. Eliminating contact with others, such as handshakes or embracing coworkers, visitors, or friends;
- iii. Avoiding touching surfaces touched by others, to the extent feasible;
- iv. Avoiding anyone who appears to be sick, or who is coughing or sneezing.

B. Social Distancing Includes:

- i. Production lines, breakrooms, common areas, walkways, entrance/exit areas of work locations, and offices.

C. Limit Meetings

- i. Meetings will be limited to the number of people that can comfortable social distance. (6 feet from another person)
- ii. Encourage virtual meetings, even when attendees are in the facility.
- iii. Use phone/radio for communications.

D. Review Workplace Layout & Methods to Follow Social Distancing

- i. Utilize barriers and layout modification where possible.
- ii. Implement visual reminders such as signage and floor markings.
- iii. Provide distancing in common areas such as markings on the floor, separation of tables, etc.

E. Staggered Schedules

- i. Implement staggered shifts to limit the number of people onsite at any given time.
- ii. Review and adjust break and lunch schedules to minimize potential overlaps of workers.
- iii. If employees are required to line-up to enter the building for any reason, floor markings will be installed to ensure distancing is maintained.

5 CLEANING/DISINFECTING GUIDELINES

To protect our employee's general disinfection measures are taken to ensure the workplace surfaces, chairs, tables, etc. are properly disinfected.

A. Handwashing/Personal Sanitation

- i. Employees should wash hands for minimum of 20 seconds with soap and water after contact with high touch surfaces, coughing or sneezing, breaks and lunch. Utilize hand sanitizer when handwashing is not possible.
- ii. Public surfaces should be cleaned with disposable wipes before touching a public surface.
- iii. Clothing worn at work should be washed in hot water and detergent and completely dried in a hot dryer.

B. Cleaning Agents

- i. Only use cleaning agents that are approved by the EPA and CDC
- ii. Verify that cleaning agents are suitable for the surface they will be applied to by reading and following the manufacturer's labeling and SDS.
- iii. Ensure the product is not past its expiration date.

C. Personal Protective Equipment

- i. Use gloves and eye protection when cleaning tools, equipment and surfaces.
- ii. Use respiratory protection when there is a respiratory risk (selection of PPE should be based on a PPE assessment, the manufacturer's instructions, local regulations (e.g. NIOSH).
- iii. Ensure proper PPE is used and disposed of in accordance with the manufacturer's instructions and local regulations.
- iv. PPE should not be shared. This includes and is not limited to safety glasses, hard hats, fall arrest equipment, and respirators.
- v. Always read and follow the PPE manufacturer's cleaning and care instructions. Cleaning can damage some types of PPE. If PPE looks damaged, do not use it and report it to your supervisor.
- vi. Avoid touching the front of surface of the eyewear/face shield. Remove eyewear/face shield by tilting the head forward and lifting the head band or earpieces. Note: The outside of protective eyewear/face shields maybe contaminated.
- vii. Gloves should be removed so they are inside-out and properly disposed of.
- viii. Reusable protective eyewear should be placed into a container and washed in detergent and water and allowed to completely air dry.

D. General Cleaning Guidelines

- i. Employees will be trained on cleaning process, including using any required PPE.
- ii. Disinfect all frequently touched surfaces daily including:

- Equipment controls (slitters and packing lines)
 - Crane Remotes
 - Coil car Remotes
 - Tablets
 - Phones
 - Keyboards
 - Mouse
 - Forklift Controls
 - Barcode Scanners
 - Conference Room Tables
 - Breakroom / Cafeteria Tables
 - Copier control panels (before and after use)
 - And any other devices used by more than one employee in the plant and offices.
- iii. Do not immerse electrical or battery-operated tools/equipment in solutions; wipe the outside of these objects with a disposable rag soaked with the solution and allow it to dry.

E. Cleaning Process

- i. Remove any visible soil from the surface with a detergent-based cleaner before applying a disinfectant.
- ii. Apply a mist of solution from a spray bottle, thoroughly wetting the area or use disposable wipes. Ensure area remains wet for the contact time specified on the product label.
- iii. For light switches, electronics, laptops, monitors etc. do not directly spray with the solution. Apply the solution to a rag and wipe the surface.
- iv. Wipe with a clean, dry paper towel and rag. After use, ensure correct disposal.
- v. Disinfect surfaces from high areas to low areas so that any dirt/dust that may contain microorganisms dislodged from above are removed when you clean the lower surfaces.
- vi. Disinfect surfaces from "clean" areas, such as office spaces, to "dirty" areas, such as bathrooms, to minimize cross-contamination.

F. Pre-shift / Post-shift and After-Use Workstation Cleaning

- i. High-touch points should be cleaned (palm buttons, touch screens, control panels, table-tops / work surfaces, stools / chairs etc.).
- ii. Employees should clean their assigned workstation at the start of their shift (or when initially assigned to that workstation), when transferring to a different workstation and, at the end of their shift/work period at their assigned station.
- iii. Tools and Equipment;
 - a. Dedicated equipment must be thoroughly cleaned/disinfected prior to and after each use.
 - b. Soap and clean water should be used when available.
 - c. If soap and water is not available, use EPA and CDC approved disinfectants.
- iv. Pre-use safety inspection checklists will be used to identify high-touch points (e.g. add a checkbox that includes acknowledgement that pre & post shift cleaning was completed).

G. Cleaning Guidelines for Decontamination of a confirmed case.

- i. An outside Cleaning Contractor will be used for decontamination and cleaning of a work area after having a confirmed case and conduct activity outlined in section (7,A) and (7,E).
- ii. Before commencing work, Cleaning Contractors will receive an appropriate site/plant orientation and provide proof of insurance, proof of workers compensation coverage, proof of PPE training, and other regulatory required training.
- iii. Cleaning contractors should wear an appropriate face mask, disposable gloves and gowns for all tasks in the cleaning process, including handling trash compatible with the disinfectant products being used.
- iv. Cleaning Contractor should immediately report breaches in PPE (e.g., tear in gloves) or any potential exposures to plant management.
- v. Cleaning Contractor should clean hands often, including immediately after removing gloves, by washing hands with soap and water for 20 seconds. If soap and water are not available and hands are not visibly dirty, cleaning crew should use an alcohol-based hand sanitizer that contains at least 60% alcohol.

H. Disinfection of Work Area of a confirmed case.

- i. The work area used by the ill person will be close off as long as practical before beginning cleaning and disinfection to minimize potential for

- exposure to respiratory droplets. Outside doors and windows will be opened to increase air circulation in the area. If possible, wait up to 24 hours before beginning cleaning and disinfection. (CDC)
- ii. Disinfect all areas used by affected employee before allowing anyone to return to area.
 - a. Disinfect work area including but not limited to workstations, touch screens, controls, computer screens and computer equipment.
 - b. Disinfect common / public areas including but not limited to cafeteria/breakrooms and restrooms including lockers, benches, wash basins etc.
 - iii. Cleaning Process
 - a. Surfaces should be disinfected using an approved agent or a household bleach solution (OSHA).
 - b. If surfaces are dirty, they should be cleaned using a detergent or soap and water prior to disinfection.
 - c. Thoroughly douse surfaces that have heavy deposits of contaminants and allow to stand for 3 minutes.
 - d. Wipe the contaminants from the surface with a paper towel and properly discard the towel.
 - e. Repeat cleaning procedure and allow surface to dry.

6 HEALTH RISK SCREENING

To help reduce potential risk of infection posed by workers, contractors & visitors to our facilities, proactive screening protocols will be in use.

A. Vulnerable Workers

- i. Human Resources will send out a communication to employees educating them on the CDC definition of vulnerable workers, and if they want to self-report their status to Human Resources who will ensure this medical information is kept strictly confidential.
<https://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/people-at-higher-risk.html>
- ii. Human Resource will keep current with Federal, State, and Local requirements to further definition vulnerable workers and applicable accommodation requirements.
- iii. Some Vulnerable worker accommodation options are:
 - a. If possible, allow work from home.

- b. Work in isolation at workplace, including little to no contact with others.
- c. Offer job protected leave if possible or applicable.

B. Entry Points

- i. Entry points will be limited to ensure only screened personnel enter the facility.
- ii. Informational handouts will be given to employees on self-isolation and self-monitoring. (<https://www.cdc.gov/coronavirus/2019-ncov/if-you-are-sick/quarantine-isolation.html>)
- iii. The Plant Management, or their designate, will monitor and conduct health risk screenings.
- iv. A Symptom Assessment will be completed daily for all individuals entering the facility without exception.
- v. Temperature Checks will be completed daily for all individuals who are not able to self-check before entering the workplace.
- vi. Records will be kept identifying answers to the Symptoms Assessments and Temperature Checks of all employees, visitors, contractors and service providers.
- vii. Contact information (Phone Number) for visitors, contractors, and service providers will be recorded for contact tracing purposes.
- viii. These records will be kept confidential.

C. Screening

- i. Use a symptom assessment as a self-assessment tool daily for all employees.
- ii. Employee **Primary Symptom** Assessment questions are:
 - Do you have a Cough (uncontrollable)?
 - Do you have a Fever (100.4 or above)?
 - Do you have shortness of breath or difficulty breathing?
 - Are you feeling Fatigue?
- iii. Employee **Less Frequent Symptom** Assessment questions are:
 - Do you have Chills
 - Do you have repeated shaking with chills?
 - Do you have a headache?
 - Do you have loss of Taste or smell?
 - Do you have muscle aches and pains?
 - Do you have a sore throat?
 - Do you have a runny or stuffy nose?
 - Do you have diarrhea and / or feel nausea?

- iv. Employees experiencing **one** or more Primary Symptoms, or **two** or more Less Frequent Symptoms are sent home and not allowed to enter the site.
(exception would be if they are able to explain by a known medical or physical condition)
- v. Employees returning from international (where applicable) travel must participate in 14 days of self-isolation and monitor for symptoms.
- vi. On-site Temperature Checks will be taken on all employees, visitors, contractors, and service providers entering the facility if they were not able to self-check prior to entering the facility.
 - a. Temperature checks are to be performed by a designated member of the management team, such as the Operations Manager, or Supervisor (appropriate PPE must be worn as outlined in section 3.0 of the Infectious Disease Prevention Plan)
 - b. Handheld touchless thermometer will be utilized.
 - c. Any employee with a temperature of 38°C or 100.4°F or higher is considered to have a fever and will not be allowed to enter the site.
 - d. See "[Employee Temperature Screening and Symptom Assessment](#)" (Attachment A) for further information.

C. Restricted Entry

- i. At a minimum, Inbound and outbound truck driver will be subject to a Symptom Assessment performed daily by their employer and kept on file at their employer's facility. These will be made available upon request.
- ii. Fed-x, UPS, USPS, or other expedited service will not be allowed to enter the facility but will have a designated location to drop packages.
- iii. Facility tours will be limited. Prior approval must be granted by the facilities VP of Operations.
- iv. Non-essential visitors will be limited. Prior approval must be granted by the facilities VP of Operations.
- v. Business essential visitors, contractors or service providers must seek approval from the VP of Operations before accessing the facility and will be required to complete a Symptom Assessment and go through a Temperature Check.
- vi. Visitors, contractors or suppliers who have known exposure to COVID-19 or who are experiencing symptoms of illness will not be permitted entry to the facility.

E. Inbound Parts / Materials / Packages Guidance

- i. Parts in transit for more than 3 days (72 hours):
 - a. These parts have a very low risk of supporting survivability of the virus.
 - b. If there is concern about possible surface contamination, employees can use gloves as they see fit.
- ii. Expedited packages that have transit time less than 3 days:
 - a. If there is concern about possible surface contamination, employees can use gloves as they see fit.

7 ISOLATION GUIDANCE AND RESPONSE

Should an employee show symptom, come in contact with a person showing symptoms, come in contact with a person who tested positive, or the employee tested positive, the following steps will be followed.

A. Employee Showing Symptoms

- i. Should one of our employees show symptoms of the COVID 19 virus (listed in section C) which may appear 2-14 days after exposure to the virus SSH will take the following actions:
 - a. SSH requires the employee to notify their Human Resource Manager immediately. SteelSummit Ohio & SteelSummit TN. Michelle Petersen 615.779.0609
 - b. Magic Grand Rapids & Magic Decatur: Brenda Ritsema 616.532.1347
 - d. If notification by the employee is made through their supervisor, it is the responsibility of the supervisor to notify the Human Resource Manager.
- ii. The company will ensure the employee that he/she will not be identified by name to their co-workers as showing symptoms while keeping in compliance with the Americans With Disabilities Act ("ADA") and HIPPA.
- iii. Instruct the employee to seek medical attention (The Company's Health Joy App is an option) and self-isolate for a minimum of 10 days and 24 hours after the fever is gone without fever reducing medicine and the symptoms have significantly improved
- iv. If a COVID 19 test is administered 5 or more days after the onset of the symptoms, and the employee does not have COVID 19, then the employee

may return to work providing they have a return to work note from a medical professional.

- v. If a COVID 19 test is administered and the employee test positive for the COVID 19 virus, then SSH will follow the guidelines in section 7E of the Infectious Disease Prevention Plan.
- vi. Arrangements will be made for the employee whose job function allows them to work remotely from home. For those non-exempt hourly employees that cannot work remotely, the employee will receive compensation according to SSH and Federal Guidelines.

B. Employee having close contact with person showing symptoms

- i. Should one of our employee come in close contact with a person, including family members, (Face-to-face contact within 6 feet greater than 15 minutes within a 24 hour period) who is showing symptoms (listed in 7A of the Infectious Disease Prevention Plan), or the person is in the process of being tested for the COVID 19 virus, SSH will take the following action:
- ii. SSH requires the employee to notify their Human Resource Manager immediately
 - a. SteelSummit Ohio & SteelSummit TN. Michelle Petersen
615.779.0609
 - b. Magic Grand Rapids & Magic Decatur: Brenda Ritsema
616.532.1347
 - c. If notification by the employee is made through their supervisor, it is the responsibility of the supervisor to notify the Human Resource Manager.
- iii. The company will ensure the employee that he/she will not be identified by name to their co-workers as showing symptoms while keeping in compliance with the Americans With Disabilities Act ("ADA") and HIPPA.
- iv. The employee will be instructed to stay at home and self-quarantine for 10 days at which time they will be allowed to return to work providing they are not showing symptoms.
- v. If the test results for the person they came in contact with is negative for the COVID 19 virus, the SSH employee may return to work providing the test of the person they came in contact with was performed 5 days after the onset of their symptoms.

- vi. If the employee has a COVID test performed 5 days after the initial exposure to a person having symptoms and the SSH employee's results are negative, the employee may return 7 days after self-quarantine.

C. Employee having casual contact with a person showing symptoms or tested positive for COVID 19

- i. Should one of our employee have casual contact (greater than 6 feet and less than 15 minutes within a 24 hour period) with a person showing symptoms (listed in 7A of the Infectious Disease Prevention Plan), in the process of being tested for the COVID 19 virus, or has tested positive for the COVID 19 virus, SSH will take the following action:
- ii. SSH requires the employee to notify their Human Resource Manager immediately
 - d. SteelSummit Ohio & SteelSummit TN. Michelle Petersen
615.779.0609
 - e. Magic Grand Rapids & Magic Decatur: Brenda Ritsema
616.532.1347
 - f. If notification by the employee is made through their supervisor, it is the responsibility of the supervisor to notify the Human Resource Manager.
- vii. The company will ensure the employee that he/she will not be identified by name to their co-workers as having come in contact with a person, showing symptoms, or testing positive for the virus, while keeping in compliance with the Americans With Disabilities Act ("ADA") and HIPPA.
- viii. The employee will be asked to closely monitor their health for the symptoms listed in 7A of the Infectious Disease Prevention Plan.
- ix. Should they develop any symptoms they will need to contact their Human resource Manager and SSH will follow the guidelines listed in 7A of the Infectious Disease Prevention Plan.

D. Employee having close contact with a person tested positive for COVID 19

- i. Should one of our employees come in close contact with a person, including family members, that has tested positive for the COVID-19 virus SSH will take the following actions:
- ii. SSH requires the employee to notify their Human Resource Manager immediately
 - a. SteelSummit Ohio & SteelSummit TN. Michelle Petersen
615.779.0609

- b. Magic Grand Rapids & Magic Decatur: Brenda Ritsema
616.532.1347
 - c. If notification by the employee is made through their supervisor, it is the responsibility of the supervisor to notify the Human Resource Manager.
 - iii. The company will ensure the employee that he/she will not be identified by name to their co-workers as having come in contact with a person testing positive for the virus, in compliance with the Americans With Disabilities Act (“ADA”) and HIPPA.
 - iv. Instruct the employee to self-quarantine for 10 days.
 - v. Should the employee develop symptoms during the 10-day period, they will be required to contact a qualified health care provider (The Company’s Health Joy App is an option).
 - vi. Arrangements will be made for the employee whose job function allows them to work remotely from home. For those non-exempt hourly employees that cannot work remotely, the employee will receive compensation according to SSH and Federal Guidelines.
 - vii. Providing the employee shows no symptoms and they will be allowed to return to work following the 10-day self-quarantine period.
 - viii. Should the employee decide to have a COVID 19 test, and it is negative, the employee will be allowed to return to work after a 7 day self-quarantine period, providing the test was performed 5 days after the onset of the contact period.
 - ix. Should the employee test positive for the COVID 19 virus, then SSH will follow the guidelines in section 7E of the Infectious Disease Prevention Plan.

E. Employee tests positive

- i. Should one of our employees test positive for the COVID-19 virus SSH will take the following actions:
- ii. SSH requires any employee who has tested positive for the COVID 19 virus to notify their Human Resource Manager immediately.
 - a. SteelSummit Ohio & SteelSummit TN. Michelle Petersen
615.779.0609
 - b. Magic Grand Rapids & Magic Decatur: Brenda Ritsema
616.532.1347

- c. If notification by the employee is made through their supervisor, it is the responsibility of the supervisor to notify the Human Resource Manager.
- iii. Ensure the infected employee that he/she will not be identified by name to their co-workers as having contracted the virus, as such would run afoul of the Americans With Disabilities Act ("ADA") and HIPPA.
- iv. Instruct the infected employee to self-isolate for a minimum of 10 days from the beginning of the symptoms and 24 hours after the fever is gone without fever reducing medicine and other symptoms have significantly improved. SSH will also require the employees to contact a qualified health care provider to provide return to work documentation.
- v. The infected employee will be asked (to the best of their recollection) to identify all office and manufacturing areas where they were physically present during the 48 hours before the symptoms were first noticed. SSH will have those areas sanitized immediately by a professional contractor and in accordance with CDC guidelines.
- vi. CDC Guidelines
 - a. It is recommended to **close off areas used by the ill persons and wait as long as practical before beginning cleaning and disinfection** to minimize potential for exposure to respiratory droplets.
 - b. **Open outside doors and windows to increase air circulation in the area.** If possible, wait up to 24 hours before beginning cleaning and disinfection.
 - c. **Outside Cleaning Provider should clean and disinfect all areas (e.g., offices, bathrooms, and common areas) used by the ill persons,** focusing especially on frequently touched surfaces.
- vii. Those employees identified as coming in close contact with the infected employee, (Face-to-face contact within 6 feet greater than 15 minutes within a 24 hour period) will be advised that an individual that has been physically present in their work area has tested positive for the virus. Therefore, out of an abundance of caution, SSH requests they stay at home for the next 10 days at a minimum and encourage them to self-isolate.
- viii. Arrangements will be made for the employee whose job function allows them to work remotely from home. For those non-exempt hourly employees that cannot work remotely, the employee will receive compensation according to SSH and Federal Guidelines.

- ix. We also encourage the impacted employees to reach out to a qualified health care provider to seek advice as to what additional steps, if any, should be taken at that time—including whether the 10 or 14-day isolation period is enough.
- x. The impacted employees will be required to provide return to work documentation before returning to work.

F. Employee who has had the COVID Vaccine.

- i. Should an employee who has had the COVID vaccine exhibit any of the symptoms or be involved in any of the situations listed in A thru E of section 7, they will need to contact their Human Resource Manager for further evaluation and instructions.

G. Human Resource Reporting Requirements

- i. Human Resource will complete the COVID 19 Case Reporting form and submit it to the Corporate EHS Manager as soon as practicable after receiving information for COVID cases meeting the definitions listed in A thru F of Section 7 of this Plan. (See [Attachment C – Covid Case Reporting Form](#))

8 COMMUNICATION / EDUCATION & TRAINING

Comprehensive and regular communication with employees, coupled with the proactive education of workplace leaders and employee will help achieve support for these protocols among workers.

A. Comprehensive Communication Plan

- i. There will be periodic communications regarding the ongoing progress of the Infectious Disease Prevention Plan
- ii. Communication will include changes to the plan, changes in the requirements set forth by the Federal, State, and Local Government Agencies
- iii. Multiple methods will be used to reinforce the requirements of the Infectious Disease Prevention Plan.
 - a. Bulletin boards,
 - b. Posters,
 - c. Signage,
 - d. Lunchroom & lobby TV's
 - e. Other employee communication methods, yet to be determined

B. Comprehensive Training Program.

- i. Training requirements will be based on job / tasks

- ii. The Operations Manager is responsible to ensuring the training material is reviewed with the employees
- iii. The EHS Manager will be responsible for developing the training material for all relevant sections of the Infectious Disease Prevention Plan to include new controls, procedures and protocols that will be used at the facility.
- iv. Small group training classes, digital media, and self-pace study guide will be used to ensure compliance to safety protocol;

C. Employee STOP Work Program

- i. Roles and Responsibilities
 - a. Senior Management:
 - Create a culture that promotes STOP WORK
 - Establishes expectations and responsibilities
 - Demonstrates support without potential for retribution
 - Resolves conflict as they arrive
 - Holds employees and contractors accountable for full compliance with the program
 - b. Supervisors and Managers:
 - Promotes a culture where STOP WORK is freely exercised
 - STOP requests are honored and resolved before resuming operations
 - Ensures necessary follow-up is completed
 - c. EHS Department:
 - Provides training, support, documentation and monitors compliance with the program.
 - d. Employees:
 - Initiate STOP WORK (in good faith) and supports STOP WORK initiated by other employees.
- ii. Process
 - a. Initiate the STOP WORK when the employee perceives the condition(s) or behavior(s) poses imminent danger to person(s), equipment or the environment
 - b. Notify the supervisor of the STOP WORK action
 - c. Investigate the concern with the appropriate personnel and determine if modifications need to be made or the employee was unaware of certain information or circumstance that render the action or condition safe.

- d. Make modifications needed to render the condition or behavior safe.
- e. Resume operations after the employee and management agree the modifications, were adequate.
- f. Follow-up with a root cause analysis to identify any additional opportunities for improvement.

D. Emergency Evacuation Plan

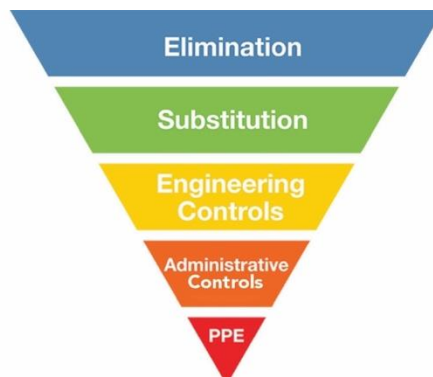
- i. The facility existing Emergency Evacuation Plan will be utilized with the following exceptions:
 - a. Social distancing will be maintained while exiting the plant and heading to the evacuation assembly point.
 - b. Social distancing will be maintained at evacuation assembly point
 - c. Face Coverings will be worn while at the evacuation point if social distancing cannot be accomplished.

E. Regulatory Requirements

- i. The EHS Manager will stay current with regulations/requirements from the Federal, State, and Local Agencies and communicate any changes to the Senior Leadership and Management that apply to the current and future status of the Infectious Disease Prevention Plan.

9 CONTROL & PREVENTION

The Hierarchy of controls is a systematic process used to minimize or reduce exposure to hazards. Using a sequence of elimination, starting at the base and working down to the apex of the triangle, controls are ordered by priority and in decreasing effectiveness.



- i. **Elimination:** remove the hazard from the workplace
 - ii. **Substitution:** replace hazardous materials or process with less hazardous ones
 - iii. **Engineering Controls:** includes designs or modifications to plants, equipment, ventilation systems, processes etc. that reduce the source of exposure
 - iv. **Administrative Controls:** controls that alter the way work is done, including timing of work, policies, work practices, equipment maintenance and personal hygiene practices
 - v. **Personal Protective Equipment:** equipment worn by individuals to reduce exposure such as contact with chemicals or exposure to noise.
- A. Examples of Additional Controls include:
- i. Plexi glass or other barriers to separate employees in close working proximity
 - ii. Replacement of light switches with motion detected sensors.
 - iii. Replacement of bathroom fixtures with no-touch fixtures.
 - iv. Remove doors (or leave open) to eliminate doorknob touch points.
 - v. Touchless door openers

10 AUDIT PROCEDURE

Audits will be performed to verify compliance with the Infectious Disease Prevention Plan.

A. Audit Process

- i. Audits will cover sections of this Infectious Disease Prevention Plan.
- ii. The EHS Manager will be responsible for the development and issuance of the audits. Level 1 & 2 Bi-monthly, Level 3 & 4 Quarterly.
- iii. Level 1 audits will cover employee observation of social distancing on the plant floor, breakroom, and in the offices. It will also include employee observations to ensure proper PPE is being worn.
- iv. Level 2 audits will cover the facilities 3rd party cleaning service and the office/plant employees cleaning practices during their shift
- v. Level 3 audits will evaluate the screening process, facility posting and communication practices
- vi. Level 4 audit will cover the audit process and follow-up on corrective actions identified during any of the Level 1 thru Level 3 audits.

- vii. Members of Management who will be responsible for performing these audits
 - a. Level 1 & 2 – Operations Manager, VP of Operations, or EHS Manager
 - b. Level 3 & 4 - EHS Manager
- viii. Audit templates can be found in [Attachment B – IDPP Level 1-4 Audit Templates.](#)