



COVID-19 Prevention Program (CPP) for Victory Foam, Inc, 3 Holland, Irvine, Ca 92618.

This CPP is designed to control exposures to the SARS-CoV-2 virus that may occur in our workplace.

Date: 12/3/2020

Authority and Responsibility

Jim McKeown Safety Manager, Linda O'Donnell Finance and H.R. Manager, Brent Comerford Operations Manager and Miguel Alvarez Production Manager has overall authority and responsibility for implementing the provisions of this CPP in our 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 in a language they understand.

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

Identification and Evaluation of COVID-19 Hazards

We will implement the following in our workplace:

- Conduct workplace-specific evaluations using the **Appendix A: Identification of COVID-19 Hazards** form.
- Evaluate employees' potential workplace exposures to all persons at, or who may enter, our workplace.
- Review applicable orders and general and industry-specific guidance from the State of California, Cal/OSHA, and the local health department related to COVID-19 hazards and prevention.
- Evaluate existing COVID-19 prevention controls in our workplace and the need for different or additional controls.
- Conduct periodic inspections using the **Appendix B: COVID-19 Inspections form** as needed to identify unhealthy conditions, work practices, and work procedures related to COVID-19 and to ensure compliance with our COVID-19 policies and procedures.
- **Cleanse all hard surface areas 4 times daily-twice on each shift. Limit access to our building from outside vendors and customers. Temperatures will be checked daily. Gloves, Mask and cleansing products are provided. Mask and social distancing are required. Employees must follow the lunch breaks and breaks set forth by management to assure safety and self-distancing.**



Employee participation

Employees and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by: **Employees who test positive for Covid need to notify manager or supervisor immediately. Employees or temps will need a return to work slip from Doctor before they can return to work due to Covid-19. If employees feel sick, have a fever they should NOT come to work.**

Employee screening

We screen our employees by: **Taking temperatures before each shift. We have notices on entrances: Please do not enter if you have a cough or fever, maintain a minimum six-foot distance from other people, Sneeze or cough into your elbow, do not shake hands or engage in any unnecessary physical contact. Mask are encouraged and provided as well as gloves. We request all EMPLOYEES and TEMPS to wear mask.**

Correction of COVID-19 Hazards

Unsafe or unhealthy work conditions, practices or procedures will be documented on the **Appendix B: COVID-19 Inspections** form, and corrected in a timely manner based on the severity of the hazards, as follows:

Each Covid-19 case is handled independently. We require those that worked close or in an area by an infected person to be tested. Testing cost if any, time off to have test performed will be reimbursed if Victory Foam, Inc. request that they be tested.

Control of COVID-19 Hazards

Physical Distancing

Where possible, we ensure at least six feet of physical distancing at all times in our workplace by:

Staggered breaks, arrival, departure and work is monitored to keep distancing in mind.

Working remotely is allowed for those that are able to work from home if they or a family member has compromised health issues.

We have notices on entrances: Please do not enter if you have a cough or fever, maintain a minimum six-foot distance from other people, Sneeze or cough into your elbow, do not shake hands or engage in any unnecessary physical contact. Mask are encouraged and provided as well as gloves. We require outside vendors / customers to wear a mask upon entering.

Individuals will be kept as far apart as possible when there are situations where six feet of physical distancing cannot be achieved.



Face Coverings

We provide clean, undamaged face coverings and ensure they are properly worn by employees over the nose and mouth when indoors, and when outdoors and less than six feet away from another person, including non-employees, and where required by orders from the California Department of Public Health (CDPH) or local health department. **Employees see supervisors, managers or safety manager to request mask, protective eye wear, and gloves. Employees should and are required to stay 6 feet from anyone not wearing a mask. Disposal mask or cloth mask are provided. Employees can wear their own mask if they prefer.**

The following are exceptions to the use of face coverings in our workplace:

- When an employee is alone in a room.
- While eating and drinking at the workplace, provided employees are at least six feet apart and outside air supply to the area, if indoors, has been maximized to the extent possible.
- Employees wearing respiratory protection in accordance with CCR Title 8 section 5144 or other safety orders.
- Employees who cannot wear face coverings due to a medical or mental health condition or disability, or who are hearing-impaired or communicating with a hearing-impaired person. Alternatives will be considered on a case-by-case basis.
- Specific tasks that cannot feasibly be performed with a face covering, where employees will be kept at least six feet apart. Any employee not wearing a face covering, face shield with a drape or other effective alternative, or respiratory protection, for any reason, shall be at least six feet apart from all other persons unless the unmasked employee is tested at least twice weekly for COVID-19.

Engineering controls

We implement the following measures for situations where we cannot maintain at least six feet between individuals: **Mask are required.**

We maximize, to the extent feasible, the quantity of outside air for our buildings with mechanical or natural ventilation systems by:

Roll up doors can be opened or closed, Fans and exhaust fans will be used in areas that have exhaust fans. A.C. in the office building is provided. If the smoke is heavy and air quality is poor, we close production and office until air quality has improved and is no longer a hazard.

Cleaning and disinfecting

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

- **Ensuring adequate supplies and adequate time for disinfecting to be sure disinfecting is done properly.**
- **Informing the employees and authorized employee representatives of the frequency and scope of cleaning and disinfecting**



Should we have a COVID-19 case in our workplace, we will implement the following procedures:

We will stop and thoroughly clean with disinfectant. We are training our employees on cleaning and disinfecting.

Shared tools, equipment and personal protective equipment (PPE)

PPE must not be shared, e.g., gloves, goggles and face shields.

Items that employees come in regular physical contact with, such as phones, headsets, desks, keyboards, writing materials, instruments and tools must also not be shared, to the extent feasible. Where there must be sharing, the items will be disinfected between uses by **cleaning/sanitizing crew employed within Victory Foam, Inc. or at times we will provide the employees with the materials and training to do it themselves.**

Sharing of vehicles will be minimized to the extent feasible, and high-touch points (for example, steering wheel, door handles, seatbelt buckles, armrests, shifter, etc.) will be disinfected between users.

Hand sanitizing

In order to implement effective hand sanitizing procedures, we allow our employees to take restroom breaks and breaks to wash hands as needed.

- **Evaluating handwashing facilities.**
- **Determining the need for additional facilities.**
- **Encouraging and allowing time for employee handwashing.**
- **Providing employees with an effective hand sanitizer, and prohibit hand sanitizers that contain methanol (i.e. methyl alcohol).**
- **Encouraging employees to wash their hands for at least 20 seconds each time.]**

Personal protective equipment (PPE) used to control employees' exposure to COVID-19

We evaluate the need for PPE (such as gloves, goggles, and face shields) as required by CCR Title 8, section 3380, and provide such PPE as needed.

When it comes to respiratory protection, we evaluate the need in accordance with CCR Title 8 section 5144 when the physical distancing requirements are not feasible or maintained. **[reference section 3205(c)(E) for details on required respirator and eye protection use.]**

We provide and ensure use of eye protection and respiratory protection in accordance with section 5144 when employees are exposed to procedures that may aerosolize potentially infectious material such as saliva or respiratory tract fluids.



Investigating and Responding to COVID-19 Cases

This will be accomplished by using the **Appendix C: Investigating COVID-19 Cases** form.

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

- **Offered COVID-19 testing at no cost during their working hours.**
- **If they test positive, they are paid 80 hours of COVID pay. (For VFI employees only).**

System for Communicating

Our goal is to ensure that we have effective two-way communication with our employees, in a form they can readily understand, and that it includes the following information:

- Who employees should report COVID-19 symptoms and possible hazards to, and how: They should report Covid-19 hazards to their immediate supervisor or manager in person, or via email or phone call.
- That employees can report symptoms and hazards without fear of reprisal.
- Our procedures or policies for accommodating employees with medical or other conditions that put them at increased risk of severe COVID-19 illness.
- Where testing is not required, how employees can access COVID-19 testing **Check with your health care provider, California has partnered with Verily and OptumServe to provide free, confidential testing statewide. Tests are available for everyone, including underserved communities and individuals who are at high risk. The purpose is to make sure if you are showing any symptoms of COVID-19 that you get tested immediately and to reduce the likelihood of bringing the virus to work. This type of voluntary testing will not be provided by the employer**
- In the event we are required to provide testing because of a workplace exposure or outbreak, we will communicate the plan for providing testing and inform affected employees of the reason for the testing and the possible consequences of a positive test; **Employees that may have been affected by a positive Covid-19 employee will be ask to go to a testing facility and Victory Foam, Inc. will pay for the testing and the time taken to be tested. This applies to Victory Foam, Inc. employees only.**
- Information about COVID-19 hazards employees (including other employers and individuals in contact with our workplace) may be exposed to, what is being done to control those hazards, and our COVID-19 policies and procedures.
- **Notices are placed at entrances and we discourage vendor and customers coming in the facility. Only vendors and customers with pre-arranged appointments are visiting the facility during the Covid-19 pandemic.**



Training and Instruction

We will provide effective training and instruction that includes:

- Our COVID-19 policies and procedures to protect employees from COVID-19 hazards.
- Information regarding COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws.
- The fact that:
 - COVID-19 is an infectious disease that can be spread through the air.
 - COVID-19 may be transmitted when a person touches a contaminated object and then touches their eyes, nose, or mouth.
 - An infectious person may have no symptoms.
- Methods of physical distancing of at least six feet and the importance of combining physical distancing with the wearing of face coverings.
- The fact that particles containing the virus can travel more than six feet, especially indoors, so physical distancing must be combined with other controls, including face coverings and hand hygiene, to be effective.
- The importance of frequent hand washing with soap and water for at least 20 seconds and using hand sanitizer when employees do not have immediate access to a sink or hand washing facility, and that hand sanitizer does not work if the hands are soiled.
- Proper use of face coverings and the fact that face coverings are not respiratory protective equipment - face coverings are intended to primarily protect other individuals from the wearer of the face covering.
- COVID-19 symptoms, and the importance of obtaining a COVID-19 test and not coming to work if the employee has COVID-19 symptoms.
- **Will be mention weekly- reminder to work safe via email and all leads and Supervisors need to instruct employees beneath them.**

Appendix D: COVID-19 Training Roster will be used to document this training.

Exclusion of COVID-19 Cases

Where we have a COVID-19 case in our workplace, we will limit transmission by:

- Ensuring that COVID-19 cases are excluded from the workplace until our return-to-work requirements are met.
- Excluding employees with COVID-19 exposure from the workplace for 14 days after the last known COVID-19 exposure to a COVID-19 case.
 - Continuing and maintaining an employee's earnings, seniority, and all other employee rights and benefits whenever we've demonstrated that the COVID-19 exposure is work related. This will be accomplished by **continuing to cover employee's health, dental and life insurance while employees of Victory Foam, Inc. are out on Covid-19 leave. 80 hours of Covid-19 will be paid 1 time to cover the time of quarantine. Employee will need to bring a Doctor's release to work in order to return to work after being off for Covid-19. We have to make sure that employee is no longer contagious.**
- Providing employees at the time of exclusion with information on available benefits.



Reporting, Recordkeeping, and Access

It is our policy to:

- Report information about COVID-19 cases at our workplace to the local health department whenever required by law, and provide any related information requested by the local health department.
- Report immediately to Cal/OSHA any COVID-19-related serious illnesses or death, as defined under CCR Title 8 section 330(h), of an employee occurring in our place of employment or in connection with any employment.
- Maintain records of the steps taken to implement our written COVID-19 Prevention Program in accordance with CCR Title 8 section 3203(b).
- Make our written COVID-19 Prevention Program available at the workplace to employees, authorized employee representatives, and to representatives of Cal/OSHA immediately upon request.
- Use the **Appendix C: Investigating COVID-19 Cases** form to keep a record of and track all COVID-19 cases. The information will be made available to employees, authorized employee representatives, or as otherwise required by law, with personal identifying information removed.

Return-to-Work Criteria

- COVID-19 cases with COVID-19 symptoms will not return to work until all the following have occurred:
 - At least 24 hours have passed since a fever of 100.4 or higher has resolved without the use of fever-reducing medications.
 - COVID-19 symptoms have improved.
 - At least 10 days have passed since COVID-19 symptoms first appeared.
 - COVID-19 cases who tested positive but never developed COVID-19 symptoms will not return to work until a minimum of 10 days have passed since the date of specimen collection of their first positive COVID-19 test.
 - A negative COVID-19 test will not be required for an employee to return to work.
 - If an order to isolate or quarantine an employee is issued by a local or state health official, the employee will not return to work until the period of isolation or quarantine is completed or the order is lifted. If no period was specified, then the period will be 10 days from the time the order to isolate was effective, or 14 days from the time the order to quarantine was effective.
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Frank Comerford, Brent Comerford, Linda O'Donnell