



COVID-19 Prevention Program

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COVID-19 Prevention Program for Therma

COVID-19 PANDEMIC

The novel coronavirus, SARS-CoV-2, causes a viral respiratory illness called COVID-19, which can make people sick with flu-like and other symptoms. The virus spreads easily when an infected person sneezes, coughs, or speaks, sending tiny droplets into the air. These droplets can be inhaled or land in the nose, mouth, or eyes of someone nearby and cause illness. COVID-19 is also considered airborne, meaning small particles of infectious virus remain suspended in the air and can infect people hours after the sick person has left the area.

Some of the symptoms of COVID-19 are cough, fever, shortness of breath, and new loss of taste or smell. Some people with mild cases may have no symptoms at all yet still can spread the virus. Avoiding crowded indoor spaces, improving indoor ventilation, staying at least six (6) feet away from people outside of your household, covering your nose and mouth with a face covering, and washing hands often with soap and water can help stop COVID-19 from spreading in the workplace.

COVID-19 PREVENTION PROGRAM

Therma is committed to protecting our employees and preventing the spread of COVID-19 at our workplace. We developed this program to reduce our workers' risk of catching and spreading this virus. We encourage employees to share information about potential COVID-19 hazards at our workplace and assist in evaluating these hazards. We will investigate all workplace illnesses and correct hazards that are identified. We stay informed on the virus presence in our community as well as recommendations made by national and local health agencies, including guidance from the California Department of Public Health (CDPH). Therma will regularly review the latest regulations and guidance and will update this plan as necessary.

This plan was last reviewed on 1/24/2024.

DESIGNATION OF RESPONSIBILITY

The Executive Leadership Team (ELT) has the authority and responsibility for implementing this plan in our workplace. All managers and supervisors are responsible for implementing this plan in their assigned work areas and ensuring employees' questions are answered in a language they understand.

All employees are required to follow the policies and procedures laid out in this plan, use safe work practices, and assist in maintaining a safe work environment.

IDENTIFICATION AND EVALUATION OF COVID-19 HAZARDS

We consider all persons to be infectious, regardless of symptoms, vaccination status, or negative COVID-19 test and periodically evaluate our workplace and operations to identify tasks that may have exposure to COVID-19. The evaluation includes all interactions, areas, activities, processes, equipment, and materials that could present potential exposure to COVID-19. Assessments include employee interactions with all persons who may be present in the workplace: co-workers, contractors, vendors, customers, and members of the public. Evaluations include:

- Treatment of COVID-19 as an airborne transmissible disease.

- Identification of places and times when people may gather or come in contact with each other for 15 minutes or more, even if they aren't working. Examples: meetings, trainings, workplace entrances, bathrooms, hallways, aisles, walkways, elevators, break or eating areas, cool-down areas, and waiting rooms.
- Employees' potential workplace exposure to all persons at the workplace. We will consider how employees and others enter, leave, and travel through the workplace, in addition to addressing stationary work. Examples: co-workers, employees of other businesses, the public, customers or clients, and independent contractors.
- Existing COVID-19 prevention measures and whether we need different or additional control measures.

Employee Participation - We encourage employees to participate in this evaluation. They can contact the Therma Safety Department to share information on potential COVID-19 hazards at our workplace or to assist in evaluating these hazards without fear of retaliation.

Employees may confidentially inform the Therma Safety Department if they have a higher risk for severe illness from COVID-19, such as those with conditions like lung disease, obesity, or cancer.

CORRECTION OF COVID-19 HAZARDS

We will treat all persons, regardless of symptoms, vaccination status, or negative test results, as potentially infectious. We select and implement feasible control measures, following the Hierarchy of Controls, to minimize or eliminate employee exposure to COVID-19. We review orders and guidance on COVID-19 hazards and prevention from the State of California and the local health department, including general information and information specific to our industry, location, and operations. We correct unsafe or unhealthy conditions, work practices, policies, and procedures in a timely manner based on the severity of the hazard.

We inspect periodically to check that controls are effective, to identify unhealthy work conditions or practices, and to ensure compliance with this plan. Any deficiencies are corrected right away, and we update this plan if needed.

Engineering Controls – Equipment and Building Systems to Minimize Exposures

Our engineering controls for COVID-19 include:

- **Ventilation** - The California Department of Public Health (CDPH) Interim guidance for Ventilation, Filtration, and Air Quality in Indoor Environments will be referenced and used for the following:
 - Maximizing outdoor air for ventilation as much as feasible except when EPA's Air Quality Index is greater than 100 or when increasing outdoor air would cause harm to employees, such as excessive heat or cold.
 - In buildings with mechanical ventilation, increasing filtration efficiency to Minimum Efficiency Reporting Value (MERV)-13 or the highest level compatible with the existing ventilation system.
 - Using HEPA filtration units in indoor areas occupied by employees for extended periods, where existing ventilation is inadequate to reduce the risk of COVID-19 transmission.

Administrative Controls – Policies, Procedures, and Practices to Minimize Exposure

Our administrative controls for COVID-19 are:

- ***Wearing a Face Covering:*** We provide face coverings to all employees, and ensure they are worn by all employees when required by a CDPH regulation or order or if required when returning to work within 10 days of a COVID-19 infection (see Return to Work section below). We will not prevent any employee from wearing a face covering, including voluntary use of a filtering face piece respirator (such as a disposable N95), unless it would create a safety hazard, such as interfering with the safe operation of equipment. Face coverings provided will be a surgical mask, medical procedure mask, or cloth/woven material mask of at least two layers. All face coverings must fit snugly, have no holes or openings, completely cover the nose and mouth, and be secured to the head with ties, ear loops, or elastic bands that go behind the head. Gaiters must be folded over or designed to have two layers of fabric. Clear plastic face coverings for use by deaf/hard-of hearing employees that meet above requirements are allowed. Face coverings must be clean and undamaged. **Face coverings are not respiratory protection against hazardous chemicals or dusts.**

When employees are required to wear a face covering, the following exceptions will apply:

1. When an employee is alone in a room or vehicle.
2. While eating or drinking at the workplace, provided employees are at least six feet apart and outside or filtered air supply to the area has been maximized to the extent feasible.
3. When employees are required to wear respirators and in accordance with T8CCR Section 5144.
4. When employees cannot wear face coverings due to a medical or mental health condition or disability. This includes a hearing-impaired person or someone using sign language to communicate. Employees exempted from wearing a face covering due to medical conditions, mental health conditions, or disability must wear an effective non-restrictive alternative, such as a face shield with a drape on the bottom that we will provide, if their condition or disability allows.
5. When a specific task cannot be performed with a face covering. This exception is limited to the time period in which such tasks are being performed.

Situations where employees are not wearing a face covering or face shield with drape, under exceptions 4 or 5 above, will be further investigated to assess COVID-19 hazards and to identify additional actions which will minimize employee exposure.

Personal Protective Equipment (PPE) – Equipment Worn by Employees to Minimize Exposure

In general, employees will not be required to use respirators at Therma for protection from COVID-19. If a hazard assessment determines respirators are needed, they will be used in accordance with T8CCR Section 5144. Disposable N95 respirators for voluntary use will be provided upon request in the following situations:

- For all employees working indoors or in vehicles with more than one person.

When respirators are provided for voluntary use, we will encourage their use, provide the correct size, train employees how to properly wear the respirator and perform a user seal check, and ensure use is in compliance with T8CCR Subsection 5144(c)(2), which includes determining that respirator use will not in itself create a hazard and providing employees with training on Appendix D to Section 5144. Instructions on proper respirator use will include the fact that facial hair interferes with the respirator's seal to the face and may not provide the expected level of protection.

Any PPE used to protect against COVID-19, such as eye protection, face coverings, respirators, and gloves, is selected based on function, fit, and availability. Employees are trained when and why PPE is necessary, how to properly put on and take off PPE, and how to clean, maintain, and store reusable PPE. Job hazard assessments are performed by supervisors to identify any PPE required for a specific job. Supervisors are responsible for ensuring that adequate supplies of PPE are available.

COVID-19 Testing

The CDPH no longer recommends testing for all close contacts and instead recommends testing only for:

- All people with new COVID-19 symptoms.
- Close contacts who are at higher risk of severe disease or who have contact with people who are at higher risk of severe disease.

We will make COVID-19 testing available at no cost and during paid time to employees who have close contact, except for asymptomatic employees who recently recovered from COVID-19.

INVESTIGATING AND RESPONDING TO COVID-19 CASES IN THE WORKPLACE

Investigating Illness at the Workplace

We investigate all COVID-19 cases in the workplace. Our investigation will include determining the day and time the COVID-19 case was last present at the workplace and, to the extent feasible, when the COVID-19 case tested positive or was diagnosed, and the date the COVID-19 cases first experienced symptoms if present. We encourage employees to report COVID-19 symptoms and stay home when ill.

Exclusion from the Workplace

To limit transmission in the workplace, COVID-19 cases will be excluded from the workplace until the Return to Work criteria below are met. Information on available benefits under legally mandated sick leave, workers' compensation law, local government requirements, and Therma leave policies will be provided at the time of exclusion.

Return to Work

Criteria for returning to work after positive test/diagnosis for COVID-19 or being excluded during an outbreak (see Appendix A and B of this plan) are as follows:

- **For COVID-19 cases with symptoms, it is a minimum of 24 hours from the day of symptom onset:**
 - COVID-19 cases may return if 24 hours have passed with no fever, without the use of fever-reducing medications, AND
 - Their symptoms are mild and improving.
- **For COVID-19 cases with no symptoms, there is no infectious period for the purpose of isolation or exclusion. If symptoms develop, the criteria above will apply.**

Therma will provide face coverings and ensure they are worn by employees who return to work when CDPH requires their use.

- **COVID-19 cases who return to work must wear a face covering indoors for 10 days from the start of symptoms.**
- **If the person did not have COVID-19 symptoms, they must wear a mask 10-days from the date of their first positive COVID-19 test.**

Notification

Following notification of a positive test/diagnosis, we will immediately take the following actions:

1. Notify employees, independent contractors, and any other employer employees who had a close contact. Unless otherwise defined by CDPH, close contact means:
 - a. In indoor spaces of 400,000 ft³ or fewer per floor, sharing the same indoor airspace as a COVID-19 case for a cumulative total of 15 minutes or more over a 24-hour period during the COVID-19 case's infectious period, regardless of use of face coverings.
 - b. In indoor spaces greater than 400,000 ft³ per floor, being within six (6) feet a COVID-19 case for a cumulative total of 15 minutes or more over a 24-hour period during the COVID-19 case's infectious period, regardless of use of face coverings.
2. When Labor Code section 6409.6 or any successor law is in effect, we will provide notice of a COVID-19 case in a form readily understandable to employees. This notice will be given to all employees, employers, and independent contractors at the worksite. If applicable, this notice will also be provided to authorized representatives of the COVID-19 case, close contacts, and all employees on the same worksite premises as the COVID-19 case within the infectious period.

REPORTING, RECORDKEEPING, AND ACCESS

Reporting

The Therma Safety Department will report to Therma's workers' compensation claims administrator when an employee has tested positive for COVID-19. This report will be made within three days of knowledge of an employee's positive test result.

Cal/OSHA Recording/Reporting - We will record on our 300 log all work-related COVID-19 cases that meet one of the following criteria: death, days away from work, restricted work or transfer to another job, medical treatment beyond first aid, loss of consciousness, significant injury or illness diagnoses by a physician or other licensed health care professional.

We will report any serious COVID-19 illness that required inpatient hospitalization or resulted in death to our local Cal/OSHA office as soon as possible, but in no case more than eight hours after knowledge.

Recordkeeping

Therma maintains records of the steps taken to implement this written program. These records include but are not limited to training, inspections, and hazard identification; these records will be retained for at least the duration of the regulation (through Feb 3, 2025).

We keep a record of and track all COVID-19 cases. These records will be retained for at least two (2) years and include the employee's:

- Name
- Contact information
- Occupation
- Location where the employee worked
- Date of the last day at the workplace
- Date of positive COVID-19 test or diagnosis

We keep records of all employee and contractor notifications of COVID-19 close contacts for at least three (3) years.

We will not reveal any personally identifiable information or employee medical information to any person or entity unless required by law (such as Cal/OSHA, local health department, and local law enforcement).

Access

This program will be made available at the workplace to employees, authorized employee representatives, and to representatives of Cal/OSHA.

COMMUNICATION SYSTEMS

We ask all employees to confidentially report, without fear of discrimination or retaliation, any symptoms, potential exposures, and possible hazards relating to COVID-19 at the workplace. Employees should make these reports to the Therma Safety Department.

We communicate information about COVID-19 hazards and our COVID-19 policies and procedures to employees and other employers, persons, and entities that come in contact with our workplace. Other employers must ensure their employees follow our plan or equivalent to ensure protection of both their and our employees. When our employees are at another worksite, we will verify that procedures at the other worksite are protective of our employees, such as adequate ventilation and excluding COVID-19 cases.

EMPLOYEE TRAINING AND INSTRUCTION

We provide all employees training and instruction on the symptoms of COVID-19 illness and exposure control methods in place at Therma including:

- Information on how COVID-19 spreads, including airborne and asymptomatic transmission.
- The fact that viral particles can travel more than 6 feet, especially indoors, so increased ventilation, physical distancing, and face coverings can decrease the spread of COVID-19 but are most effective when used in combination.
- Symptoms of COVID-19.
- The importance of getting a COVID-19 test and staying out of the workplace if you have symptoms.
- Information on our COVID-19 policies, how to access COVID-19 testing and vaccination, and the fact that vaccination is effective at protecting against serious illness or death.
- Risk of exposure to COVID-19 on the job.
- Control measures to protect employees from exposure and infection:
 - Requiring employees to stay home when sick.
 - Conditions that require the use of face coverings at the workplace, and how to request face coverings at the workplace.
 - Proper use of a face covering when required and the fact that a face covering is NOT respiratory protection. Face coverings are source control used to contain infectious particles and protect others; respirators protect the wearer from infectious airborne particles.
 - Covering coughs and sneezes.
- Acceptable PPE and proper use.
- Policies for providing respirators and the right of employees to request a respirator for voluntary use. When respirators are provided for voluntary use:
 - How to properly wear the respirator provided, and
 - How to perform a user seal check each time the respirator is donned, and

- Facial hair can interfere with the seal of the respirator and reduce the amount of protection provided.
- Information on COVID-19-related leave benefits available under legally mandated sick leave, if applicable, workers' compensation law, local governmental requirements, Therma leave policies, and leave guaranteed by contract.
- The contents of this plan.

APPENDIX A - COVID-19 OUTBREAKS

The following procedures will be followed in addition to our CPP whenever three (3) or more employee COVID-19 cases within an exposed group (as defined in section 3205(b)) have visited our workplace during their infectious period within a 14-day period or when the number of cases at the worksite meets another definition of outbreak as defined by CDPH regulation or order. These procedures can be stopped when one or fewer new COVID-19 cases are detected in the exposed group for a 14-day period.

Testing

Therma will make testing available to employees within the exposed work group, regardless of vaccination status, at no cost during working hours except for:

- Employees not present during the 14-day outbreak period defined above.
- Returned cases - COVID-19 cases who have returned to work after meeting the Return to Work criteria and do not develop symptoms after returning. This designation will apply for 30 days after initial onset of symptoms or positive test, whichever was first. If a period other than 30 days is required by CDPH regulation or order, that period will apply.

This testing will be made available immediately after determination of an outbreak, and then on a weekly basis to all employees in the exposed group who remain at the workplace.

Employees who refuse to test and have symptoms must be excluded for at least 24 hours from symptom onset and can return to work only when they have been fever-free for at least 24 hours without the use of fever-reducing medications, and symptoms are mild and improving.

Additional Controls to Correct COVID-19 Hazards

In addition to the controls listed in our CPP, we will do the following:

- Notify employees in the exposed group that they can request a respirator for voluntary use.
- In buildings or structures with mechanical ventilation, we will maximize the outdoor air supply, and filter recirculated air with MERV-13 or higher efficiency filters if compatible with the ventilation system. If MERV-13 or higher filters are not compatible, we will use filters with the highest compatible filtration rating. We will use HEPA filtration units in indoor areas occupied by employees for extended periods where ventilation is inadequate to reduce the risk of COVID-19 transmission.

Workplace Investigation, Review, and Hazard Correction

We will investigate all workplace illness to determine potential factors in the workplace that could have contributed to the COVID-19 outbreak. Additionally, we will review our relevant COVID-19 policies, procedures, and controls and we will implement changes needed to prevent further virus spread.

All investigations and reviews will be documented to include:

- Investigation of new or unabated COVID-19 hazards.
- Review of our leave policies and practices, including whether employees are discouraged from staying home when sick.
- Review of our COVID-19 testing policies.
- Investigation of the sufficiency of outdoor air.
- Investigation of the sufficiency of air filtration.
- Investigation into feasibility of physical distancing.

These reviews will be updated every 30 days that this appendix is in effect with new information, new or previously unrecognized COVID-19 hazards, or as necessary. We will make changes based on investigations and reviews to reduce the spread of COVID-19. This will include considering such actions as moving work tasks outdoors, allowing employees to work remotely, increasing outdoor air supply to our indoor workplaces, improving air filtration to the highest MERV rating compatible with our air handling system, increasing physical distancing as much as feasible, requiring respiratory protection in compliance with T8CCR Section 5144, or other applicable control measures.

APPENDIX B – MAJOR COVID-19 OUTBREAKS

The following procedures will be followed in addition to our CPP and Appendix A – COVID-19 Outbreaks, whenever 20 or more employee COVID-19 cases within an exposed group (as defined in section 3205(b)) have visited our workplace during their infectious period within a 30-day period. These procedures can be stopped when one or fewer new COVID-19 cases are detected in the exposed group for a 14-day period.

Testing

Therma will continue to provide testing as described in Appendix A of our CPP except that testing will be required of all employees in the exposed group, regardless of vaccination status. Employees who refuse to test and have symptoms must be excluded for at least 24 hours from symptom onset and can return to work only when they have been fever-free for at least 24 hours without the use of fever-reducing medications, and symptoms are mild and improving.

Reporting

Therma must report major outbreaks to Cal/OSHA.

Additional Controls to Correct COVID-19 Hazards

In addition to the controls listed in our CPP and Appendix A, we will do the following:

- Provide respirators for voluntary use (such as a disposable N95) to employees in the exposed group, encourage use, and provide training in their use. Voluntary use of respirators will be according to T8CCR Section 5144(c)(2).
- Any employee in the exposed work group not wearing a respirator required by Therma in compliance with section 5144 will be separated from other people by at least six (6) feet except when demonstrated to not be feasible or when they are momentarily closer than six (6) feet during movement. When it is not feasible to maintain six (6) feet of distance, individuals will be as far apart as feasible. Methods for physical distancing include:
 - Reducing the number of persons in an area at one time (including visitors)
 - Visual cues such as signs and floor markings to show employee locations and paths of travel
 - Staggered arrival, departure, work, and break times
 - Adjusted work processes (such as reducing production speed) to allow greater distance between employees
 - Telework or other remote work arrangement