



Michigan Department of Labor and Economic Opportunity
Michigan Occupational Safety and Health Administration
Consultation Education and Training Division

COVID-19 Preparedness & Response Plan For Lower and Medium Exposure Risk Employers

General

The following COVID-19 preparedness & response plan has been established for Spiral Industries, Inc. in accordance with the requirements in the [Executive Orders \(EOs\)](#) for COVID-19 signed by Governor Gretchen Whitmer, the OSHA [Guidance on Preparing Workplaces for COVID-19](#), and the latest [guidance](#) from the US Centers for Disease Control and Prevention (CDC). The purpose of this plan is to minimize or eliminate employee exposure to SARS-CoV-2.

The EOs, OSHA guidance, and CDC guidance for COVID-19 have general safeguards applicable for all workplaces and specific safeguards for certain industries. Brandon Shouse – Plant Manager, has read these guidance documents carefully, found the safeguards appropriate to Spiral Industries, Inc. based on its type of business or operation, and has incorporated those safeguards into this COVID-19 preparedness and response plan.

As the COVID-19 situation evolves, the EOs and CDC guidance are periodically updated. Brandon Shouse – Plant Manager will be responsible for visiting the EO webpage and CDC guidance webpage regularly (for example, weekly) for the latest information and for revising the plan as necessary. [Click here for the EOs](#). [Click here for the CDC guidance documents](#). This plan reflects the EOs and CDC guidance as of 9/1/2020.

Spiral Industries, Inc. has designated one or more worksites supervisors to implement, monitor, and report on the COVID-19 control strategies developed in this plan. The worksite supervisor(s) is Brandon Shouse. The supervisor will remain on-site at all times when employees are present on site. An on-site employee may be designated to perform the supervisory role.

The plan will be made readily available to employees and labor unions. The plan will be made available via Spiral Industries, Inc. website (<https://spiralindustries.com/covid-19-safety-plan/>), posted on company bulletin board, kept within internal network, and/or hard copy distributed to all employees.

Exposure Determination

Spiral Industries, Inc. has evaluated routine and reasonably anticipated tasks and procedures for all employees to determine whether there is actual or reasonably anticipated employee exposure to SARS-CoV-2. Brandon Shouse was responsible for the exposure determination.

Spiral Industries, Inc. has determined that its employees' jobs fall into only the lower exposure and medium exposure risk categories as defined by the OSHA Guidance on Preparing Workplaces for COVID-19:

- **Lower Exposure Risk Jobs.** These jobs do not require contact with known or suspected cases of COVID-19 nor frequent close contact (for example, within six feet) with the general public. Workers in this category have minimal occupational contact with the public and other coworkers. Examples are small offices, small manufacturing plants (less than 10 employees), small construction operations (less than 10 employees), and low-volume retail establishments, provided employees have infrequent close contact with coworkers and the public.
- **Medium Exposure Risk Jobs.** These jobs are those that require frequent or close contact (for example, within six feet) with people who may be infected with SARS-CoV-2, but who are not known or suspected COVID-19 patients. Examples are most jobs at manufacturing plants, construction sites, schools, high-volume retail settings, and other high-population-density work environments.



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Brandon Shouse – Plant Manager verifies that Spiral Industries, Inc. has no high risk exposure jobs. High exposure risk jobs have high potential for exposure to known and suspected cases of COVID-19. Examples are most jobs in healthcare, medical transport, nursing homes and residential care facilities, mortuaries, law enforcement, and correctional facilities. This sample plan is not intended for employers who have high exposure risk jobs.

Spiral Industries, Inc. has categorized its jobs as follows:

(NOTE: Some jobs may have more than one type of exposure risk depending on the task or qualifying factors.)

Job/Task	Exposure Risk Determination (Lower or Medium)	Qualifying Factors (For Example, No Public Contact, Public Contact)
Bending	Low Risk	No Public Contact
Hose Cutter	Low Risk	No Public Contact
Welding	Low Risk	No Public Contact
Testing / Laboratory	Low Risk	No Public Contact
Special Order (S.O.)	Low Risk	No Public Contact
Saw	Low Risk	No Public Contact
Packing	Low Risk	No Public Contact
Flare and Beadlock	Low Risk	No Public Contact
Drill and Spotweld	Low Risk	No Public Contact
Cell	Low Risk	No Public Contact
Press	Low Risk	No Public Contact
Assembly	Low Risk	No Public Contact
Warehouse	Low Risk	No Public Contact
Shipping and Receiving	Medium Risk	Controlled Public Contact
Front Desk	Medium Risk	Controlled Public Contact
Engineering / R&D	Low Risk	No Public Contact
Sales and Marketing	Low Risk	No Public Contact
Accounting / HR	Low Risk	No Public Contact
Information Technologies	Low Risk	No Public Contact
Administration	Low Risk	No Public Contact

Engineering Controls

Spiral Industries, Inc. has implemented feasible engineering controls to minimize or eliminate employee exposure to SARS-CoV-2. Engineering controls involve isolating employees from work-related hazards using ventilation and other engineered solutions. In workplaces where they are appropriate, these types of controls reduce exposure to hazards without relying on worker behavior and can be the most cost-effective solution to implement.

For lower exposure risk jobs, new engineering controls are not required. For medium exposure risk jobs, engineering controls can include:

- Installing physical barriers (such as clear plastic sneeze guards) between coworkers or between workers and customers.
- Installing a drive-through window for customer service.
- Increasing the amount of ventilation in the building.
- Increasing the amount of fresh outdoor air that is introduced into the building.

The Operations Manager will be responsible for seeing that the correct engineering controls are chosen, installed, maintained for effectiveness, and serviced when necessary.



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The following engineering controls have been implemented:

Job/Task	Engineering Control
Shipping and Receiving	Exterior Sign with Instructions & Contact Number, Exterior Doorbell, Locked Door
Front Desk	Exterior Sign with Instructions & Contact Number, Physical Glass Barrier in Front Lobby, Doorbell in Front Lobby, Locked Door

Administrative Controls

Administrative controls are workplace policies, procedures, and practices that minimize or eliminate employee exposure to the hazard. Brandon Shouse will be responsible for seeing that the correct administrative controls are chosen, implemented and maintained for effectiveness.

The following administrative controls have been established for Spiral Industries, Inc.:

(Choose the controls below that are feasible for your workplace. Delete the controls that are not feasible or applicable. Add additional rows for other feasible administrative controls that will be implemented. In the first column, indicate which jobs or tasks will use each administrative control.)

Job/Task	Administrative Control (For Example, Workplace Distancing, Remote Work, Notifying Customers)
All employees	Maintain at least six feet from everyone on the worksite.
	Use ground markings, signs, and physical barriers to prompt employees to remain six feet from others.
	Promote remote work (telecommuting) to the fullest extent possible.
	Promote flexible work hours (staggered shifts) to minimize the number of employees in the facility at one time.
	Establish alternating days or extra shifts to reduce the total number of employees in the facility at a given time.
	Restrict business-related travel for employees to essential travel only.
	Restrict face-to-face meetings. Communicate with others through phone, email, teleconferencing, and web conferencing.
	Restrict the number of customers in the establishment at any given time.
	Minimize the sharing of tools, equipment, and items.
	Provide employees with non-medical grade face coverings (cloth face coverings).
	Require employees to wear cloth face coverings when they cannot consistently maintain six feet of separation from other individuals in the workplace.
	Require customers and the public to wear cloth face coverings.
	Keep customers informed about symptoms of COVID-19 and ask sick customers to stay at home until healthy again. Encourage sick customers to use drive-through services, curbside pickup, or home delivery.
	Provide customers and the public with tissues and trash receptacles.
	Encourage customers to place orders for merchandise or services through the phone or web.
	Promote curbside and home delivery to minimize contact with customers.
	Encourage proper cough and sneeze etiquette by employees, including covering coughs and sneezes and coughing and sneezing in one's elbows rather than hands.
	Ensure that sick leave policies are flexible and consistent with public health guidance, so employees do not go to work sick.
Do not require a healthcare provider's note for employees who are sick with acute respiratory illness to validate their illness.	
Maintain flexible policies that permit employees to stay home to care for a sick family member.	



Hand Hygiene

Operations Manager will be responsible for seeing that adequate handwashing facilities are available in the workplace and that regular handwashing is required. Frequency of such handwashing will be determined in part by factors such as when and how often the employees’ hands are potentially exposed to SARS-CoV-2. When handwashing facilities are not available, Spiral Industries, Inc. shall provide employees with antiseptic hand sanitizers or towelettes. Spiral Industries, Inc. will provide time for employees to wash hands frequently and to use hand sanitizer.

Disinfection of Environmental Surfaces

Spiral Industries, Inc. will increase facility cleaning and disinfection to limit exposure to COVID-19, especially on high-touch surfaces (for example, door handles), paying special attention to parts, products, and shared equipment (for example tools, machinery, vehicles). Spiral Industries, Inc. will make cleaning supplies available to employees upon entry and at the worksite.

Operations Manager will be responsible for seeing that environmental surface in the workplace are cleaned and disinfected. Frequency of such disinfection will be determined in part by factors such as when and how often the environmental surfaces are potentially exposed to SARS-CoV-2. When choosing cleaning chemicals, Spiral Industries, Inc. will consult information on Environmental Protection Agency (EPA)-approved disinfectant labels with claims against emerging viral pathogens. Products with EPA-approved emerging viral pathogens claims are expected to be effective against SARS-CoV-2 based on data for harder to kill viruses. The manufacturer’s instructions for use of all cleaning and disinfection products will be strictly adhered to.

The following is a list of environmental surfaces, methods used to disinfect, and the frequency of such disinfection:

Surface	Method/Disinfectant Used	Schedule/Frequency
Desk, Computer Keyboard/Mouse, Door Knobs, Hand Rails	Diluted Clorox Bleach Spray (Sodium Hypochlorite)	2 times per day Monday, Tuesday, Wednesday, Thursday
Bathroom Toilets, Sinks and Door Handles	Diluted Clorox Bleach Spray (Sodium Hypochlorite)	1 time per day Monday, Tuesday, Wednesday, Thursday

Spiral Industries, Inc. will perform enhanced cleaning and disinfection after persons confirmed to have COVID-19 have been in a work area. In the interim, that work area will be temporarily closed, and employees will be sent home or relocated. Brandon Shouse – Plant Manager will be responsible for seeing that this protocol is followed.

Personal Protective Equipment (PPE)

Spiral Industries, Inc. will provide employees with personal protective equipment for protection from SARS-CoV-2 appropriate to the exposure risk associated with the job. The PPE policy will follow the CDC and OSHA guidance applicable to the industry and types of jobs at the workplace, and it will be in accordance with latest EOs.

All types of PPE are to be:

- Selected based upon the hazard to the worker.
- Properly fitted and periodically refitted as applicable.
- Consistently and properly worn.
- Regularly inspected, maintained, and replaced, as necessary.
- Properly removed, cleaned, and stored or disposed of, as applicable, to avoid contamination of self, others, or the environment.

Spiral Industries, Inc. will provide non-medical grade face coverings (cloth face coverings) to employees. (Cloth face coverings are technically not considered PPE.) Spiral Industries, Inc. will require employees to wear face coverings when they cannot consistently maintain six feet of separation from other individuals in the workplace. Spiral Industries, Inc. will consider face shields when employees cannot consistently maintain three feet of separation from other individuals in the workplace.

The following type(s) of PPE have been selected for use:



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Job/Task	PPE
All Positions	MedGuard Face Mask
Manufacturing Positions	Latex Gloves
Manufacturing Positions	Protective Eyeglasses

Health Surveillance

Spiral Industries, Inc. has implemented a screening protocol to identify known or suspected cases of COVID-19 among employees and isolate them from the remainder of the workforce. Operations Manager will be responsible for ensuring that all required health surveillance provisions are performed.

As workers enter the place of employment at the start of each work shift, Spiral Industries, Inc. will have employees self-screen for COVID-19. Spiral Industries, Inc. will have employees complete a questionnaire covering the signs and symptoms of COVID-19 and their exposure to people with suspected or confirmed COVID-19. When obtainable, a no-touch thermometer will be used for temperature screening of employees. Spiral Industries, Inc. will similarly screen contractors, suppliers, and any other individuals entering the worksite.

Employees have been directed to promptly report any signs and symptoms of COVID-19 to the Operations Manager before and during the work shift. Spiral Industries, Inc. has provided employees with instructions for how to make such a report to the employer.

The specific instructions for employee reporting signs and symptoms of COVID-19 are as follows:

(LIST REPORTING INSTRUCTIONS PROVIDED TO EMPLOYEES)

Spiral Industries, Inc. will physically isolate any employees with known or suspected COVID-19 from the remainder of the workforce, using measures such as, but are not limited to:

- Not allowing known or suspected cases to report to or remain at their work location.
- Sending known or suspected cases to a location (for example, home) where they are self-isolating during their illness.
- Assigning known or suspected cases to work alone at the location where they are self-isolating during their illness.

Spiral Industries, Inc. will not discharge, discipline, or otherwise retaliate against employees who stay at home or who leave work when they are at particular risk of infecting others with COVID-19.

When an employee is identified with a confirmed case of COVID-19, Brandon Shouse will notify the local public health department immediately, and any co-workers, contractors, or suppliers who may have come into contact with the person who is the confirmed case of COVID-19, within 24 hours. When notifying coworkers, contractors, and suppliers, Spiral Industries, Inc. will not reveal the name or identity of the confirmed case.

Spiral Industries, Inc. will allow employees with a confirmed or suspected case of COVID-19 to return to the workplace only after they are no longer infectious according to the latest guidelines from the CDC.

Training

Operations Manager shall coordinate SARS-CoV-2 training and ensure compliance with all training requirements.

Spiral Industries, Inc. will train workers on, at a minimum:

1. Routes by which the virus causing COVID-19 is transmitted from person to person.
2. Distance that the virus can travel in the air, as well as the time it remains viable in the air and on environmental surfaces.
3. Symptoms of COVID-19.
4. Workplace infection-control practices.
5. The proper use of PPE, including the steps for putting it on and taking it off.



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6. Steps the worker must take to notify the business or operation of any symptoms of COVID-19 or a suspected or confirmed diagnosis of COVID-19.
7. How to report unsafe working conditions.

Operations Manager shall create a record of the training. The record will list the names of the employees trained, the training date, name of trainer, and content of training.

Recordkeeping

Spiral Industries, Inc. will maintain the following records as they relate to the COVID-19 preparedness and response plan:

1. Training records.
2. A record of daily entry self-screening results for all employees or contractors entering the workplace, including a questionnaire covering signs and symptoms of COVID-19 and exposure to people with suspected or confirmed COVID-19.
3. When an employee is identified with a confirmed case of COVID-19, record when the local public health department was notified; as well as any co-workers, contractors, or suppliers who may have come into contact with the person who was the confirmed case of COVID-19.

Operations Manager will ensure that the records are kept.