

Marcellus Metalcasters’ COVID-19 Written Exposure Control Plan

1. Overview:

- a. This COVID-19 Written Exposure Control Plan is established per the requirements set forth in Michigan Executive Order 2020-97 (COVID-19).
- b. Caitlin McMahan, Brad Ade, Ian Somerville, and Jeff Thomson will be the designated supervisors (ie: plant leaders), responsible for ensuring that this plan is implemented and followed to the best of their abilities.
- c. This is a living document and will be revised as new information regarding the coronavirus emerges. It will also be amended as necessary to maintain compliance with changes in federal, state, and local guidelines. The most up-to-date copy will be posted in the breakroom and additional digital copies will be shared upon request. The record of revisions to this document can be found in Appendix A.
- d. Marcellus Metalcasters, Inc. has determined that all its employees are considered medium exposure risk.

Job Role	Risk Level	Considerations
Molders	Medium	Close contact with other employees but minimal occupational exposure to the public
Sand Makers		
Core Makers		
Melters		
Grinders		
Maintenance		
Office Workers		

- e. This plan is structured to act as the record of requirements mandated by item 10 in Michigan Executive Order 2020-97 (COVID-19). Section 2a of this document covers the employee training per item 1 c of the executive order. Section 2c of this document covers the self-health screening questionnaire per item 1 d of the executive order. Section 3b of this document covers the contact log per item 1 k of the executive order.

2. Preventative Actions:

- a. TRAINING - Employees will be trained in the following topics. The training material can be found in Appendix B and the record of training can be found in Appendix C.
 - i. Workplace infection control practices
 - ii. The use of personal protective equipment, including the proper steps for putting it on and taking it off
 - iii. Steps to take to notify management of any symptoms of COVID-19 (whether suspected or confirmed)
 - iv. How to report unsafe working conditions
 - v. Routes by which the virus causing COVID-19 is transmitted from person to person
 - vi. Distance that the virus can travel in the air, as well as the time it remains viable in the air and on environmental surfaces
- b. HAND HYGINE - All employees are encouraged to wash their hands per the CDC’s guidelines with the soap provided, especially before touching their face, eating, or after touching shared equipment without gloves on, coughing or sneezing. Additionally, all employees are reminded to cough or sneeze into their shoulder or a tissue and away from

- others. Hands should be washed with warm water and soap for a minimum of 20 seconds, paying attention to all features of the hand, including nail beds, fingers and wrists.
- c. HEALTH SURVEILLANCE - Anyone entering the building, including employees, contractors, and other visitors must perform a daily self-screening, including a temperature check. Before entering the building, everyone is asked to review the questionnaire posted on the outside of all entrance doors. If an individual answers yes to any of the questions on the questionnaire, they are prohibited from entering the building and asked to contact their supervisor or sales rep (per the contact info on the questionnaire) for further instructions. A copy of the questionnaire is included in Appendix D.
 - i. Employees entering the building are required to enter through the main front door and can only do so after they have reviewed the questionnaire.
 - ii. Individuals that develop symptoms indicating COVID-19 or who fail to pass the self-check questionnaire will be considered to have a suspected COVID-19 case and will not be permitted inside the building.
 - iii. If an individual develops symptoms while in the building, they are asked to leave the premises immediately.
 - iv. All non-essential in-person visits are also suspended. Any visitors are required to sign in, providing the date of their visit, their name, and contact info.
 - d. SOCIAL DISTANCING - All individuals on site are asked to maintain 6 feet of distance between each other, to the maximum extent possible.
 - i. To support social distancing, the breakroom will be limited to two occupants at a time and occupants should maintain their distance. If necessary, chairs will also be set up outside the breakroom (near the time clock) for additional break space. Employees are also welcome to utilize the picnic table, benches near the library, or their cars when taking breaks or eating lunch.
 - e. PERSONAL PROTECTIVE EQUIPMENT - All employees have been provided with respirators/PAPR Units and safety glasses/shields/hoods as well as cleaning materials for them. Employees are asked to wear their respirators/PAPR Units and safety glasses/shields/hoods to the maximum extent possible, especially when within six feet of one another.
 - i. Employees should not share their PPE items with others. If an employee needs an article of PPE (as a replacement, for a new job duty, etc.) they should ask their supervisor for assistance.
 - ii. If an employee uses up the last of the cleaning supplies, they must inform someone in the office to ensure that the stock is replenished.
 - f. ENVIRONMENTAL SURFACE DISINFECTION - High-touch and shared surfaces will be cleaned in compliance with CDC guidelines. These items as well as a daily cleaning checklist are outlined in Appendix E.
 - i. Where employees/departments have their own tools or equipment, employees are asked to only use their (or their department's) tools, even if someone else's tools are more convenient.
 - g. ENGINEERING CONTROLS – Doors and windows should be open when and where possible and the overhead exhaust system shall be utilized during daily operations.

- h. ADMINISTRATIVE CONTROLS - Marcellus Metalcasters will continue using staggered shifts and break/lunch times.
 - i. Employees are reminded to utilize the Teladoc services provided by HealthiestYou and United Health Care if they need to seek advise from a medical professional.
 - i. Ask someone in the office if you are not currently on the health insurance or HealthiestYou and wish to be added.
 - j. When goods are received or delivered, paperwork will be pre-signed. Please inform delivery people that we do not need their signatures at this time to limit the exchanging of pens, paper, etc.
 - k. Employees are highly encouraged to follow the CDC's recommendations (such as hand washing and social distancing) as well as federal, state, and local laws when outside of work, including during one's commute.
 - l. Business related travel has been suspended to essential travel only.
- 3. In the Event of Confirmed or Suspected COVID-19 Cases:**
- a. In the event that one or more employees test positive for COVID-19, a deep cleaning of the building will be performed, with a special focus on cleaning and disinfecting high-touch, shared surfaces, and tools or equipment used by those employees. Cleaning will be performed per Appendix F.
 - b. If an employee tests positive for COVID-19, Marcellus Metalcasters management will, while maintaining patient confidentiality per HIPPA and ADA guidance, notify within 24 hours the parties listed below. Records of notification will be kept in Appendix G.
 - i. The local public health department (Cass County Public Health) at 269-621-3143
 - ii. Any co-workers, contractors, or suppliers who may have come into contact with that employee
 - iii. The other supervisors (plant leaders)
 - c. If an employee has a confirmed or suspected case of COVID-19, they must adhere to the following rules and procedures:
 - i. They are prohibited from entering the premises (or must leave the premises immediately, if symptoms develop while already on site)
 - ii. Must notify their supervisor within 8 hours of the scheduled start of their shift that they are calling in sick due to either a confirmed or suspected case of COVID-19.
 - iii. Once an individual calls in for a confirmed or suspected case of COVID-19, they are prohibited from re-entering the premises until they are no longer infectious, according to the latest guidelines from the CDC.
 - iv. Once an employee (salary or hourly) calls off work for a confirmed or suspected case of COVID-19, they will be put on sick leave. Reference the poster in Appendix I for more details.
 - 1. If employee leave exceeds the sick leave mandated by the Families First Coronavirus Response Act, they may be laid off and encouraged to collect unemployment, until such time that they can return to work, per the latest guidelines from the CDC. Individuals requiring assistance to apply for unemployment are encouraged to call the office at 269-646-0202 for help.

- v. Employees are encouraged to communicate with their supervisor on a timely basis, with frequent updates and honest, accurate information.
 - d. In the event that one or more individuals have confirmed or suspected cases of COVID-19, Marcellus Metalcasters management will, on a case by case basis, review the situation and respond accordingly. This may include sending some or all employees home for the day for cleaning, sending some or all employees home for longer periods of time, or shutting down operations indefinitely. If Marcellus Metalcasters shuts down for a week or more, all individuals will be formally laid off and encouraged to apply for unemployment.
 - i. Individuals requiring assistance to apply for unemployment are encouraged to call the office at 269-646-0202 and leave a message for help.
 - e. Cases of COVID-19 may need to be reported on the MIOSHA 300 Log. At the time a case is confirmed, the most up-to-date MIOSHA reporting guidelines will be referenced to determine if the case is reportable. These criteria may include:
 - i. The COVID-19 case is confirmed as defined by CDC
 - ii. Work-related as defined by MIOSHA
 - iii. Involves one or more of the general recording criteria
- 4. Returning to Work:**
- a. Employees with confirmed or suspected cases of COVID-19 will be allowed to return to work after they are no longer infectious according to the latest guidelines from the CDC.
 - b. If Marcellus Metalcasters has been shut down for a week or more, the building re-opening checklist in Appendix H will be used prior to allowing employees back into the building.
- 5. Other Considerations:**
- a. Employees that must take time off work to help care for family members with COVID-19 or who are concerned about their risk of contracting COVID-19 should communicate with their supervisor and management about taking time off.
 - i. Please reference the Families First Coronavirus Response Act poster in Appendix I for more information about what is covered under that act.
 - ii. Unemployment benefits are available to those that cannot work due to COVID-19 but are not otherwise covered by the Families First Coronavirus Response Act.

Appendix A – Table of Revisions

Revision Level	Revisions	Date	Author
A	Initial Publication	6/1/2020	Caitlin McMahan

Appendix B – Employee Training

In accordance with Michigan Executive Order 2020-97 (COVID-19), employees must be trained on a variety of topics pertaining to COVID-19 and measures required for safety.

Workplace Infection Control Practices

COVID-19 is caused by coronavirus, which is a highly contagious virus. To reduce the spread of coronavirus, employers have been asked to draft and implement Written Exposure Control Plan documents to help guide business operations. The Marcellus Metalcasters Written Exposure Control Plan outlines the steps being taken to help control workplace infections.

These measures include reviewing the body of the Written Exposure Control Plan with employees, making copies of the plan available to employees, and making updates to the plan as new information and regulations pertaining to coronavirus become available.

Proper Use of PPE Including the Proper Steps for Putting it On and Taking it Off

While Marcellus Metalcasters requires that employees wear a wide variety of PPE to be safe on the premises, two pieces of PPE that are already mandatory are also especially helpful in fighting the spread of COVID-19. These are respirators (or PAPR units) and safety glasses (or prescription glasses with side shields, welding hoods, PAPR hoods, or face shields).

Although we review the proper use and storage of these items of PPE annually, MIOSHA is requiring an additional review as part of our COVID-19 Written Exposure Control Plan.

Please ensure respirators or their equivalent are worn at all times while on the shop floor for protection from both respiratory crystalline silica and potential COVID-19 transmission. In the event that it is necessary to remove a respirator for communication, a job task, etc., ensure that you are standing at least 6 feet from everyone else and that they are wearing their respirators. Now more than ever, PPE supplies are difficult to acquire so ensure that respirators are stored properly and kept clean and operational. When not being worn, respirators should be stored in a clean bag (such as a gallon ziplock) and put out of harm's way, such as in a locker. Ensure that your equipment is clean before putting it on and wash your hands after taking it off. Windex and alcohol swabs have been provided to ensure that equipment can be disinfected and kept clean. If you use up the last of the cleaning products, please notify someone in the office so that they can be replenished.

Please ensure that safety glasses or their equivalent are worn at all times while on the shop floor for protection from both flying debris and potential COVID-19 transmission. When not being worn, safety glasses should be stored in a clean environment out of harm's way, such as a locker. Ensure that your equipment is clean before putting it on and wash your hands after taking it off. Windex and alcohol swabs have been provided to ensure that equipment can be disinfected and kept clean. If you use up the last of the cleaning products, please notify someone in the office so that they can be replenished.

Steps to Take to Notify Management of Any Symptoms of COVID-19 (Whether Suspected or Confirmed)

In the event that you test positive for COVID-19 or have symptoms of COVID-19, you are asked to follow the procedures outlined in Section 3.

How to Report Unsafe Working Conditions

First and foremost, report unsafe working conditions to your supervisor and management. Management will review the situation and determine which next steps are appropriate to rectifying the situation.

If you feel that the unsafe working condition has not been resolved adequately, you can contact MIOSHA for further guidance. Complaints can be filed electronically on the MIOSHA website. You can also call MIOSHA toll-free at 800-TO-MIOSH (800-866-4674) to have a complaint form mailed to you.

Routes by Which the Virus Causing COVID-19 is Transmitted From Person to Person

Per the CDC, there are several methods by which COVID-19 can be transmitted from Person to Person, namely exposure to respiratory droplets from someone who is infected, such as from talking, coughing, or sneezing.

It may be possible that a person can get COVID-19 by touching a surface or object that has SARS-CoV-2 on it and then touching their own mouth, nose, or possibly their eyes, but this is not thought to be the primary way the virus spreads.

People without symptoms can also spread the virus.

Distance that the Virus Can Travel in the Air, As Well As the Time it Remains Viable in the Air and On Environmental Surfaces

Per the CDC, the coronavirus can be spread by traveling through the air and from being on environmental surfaces. Although new information continues to emerge, at this time we believe that the virus can 13 feet or more through the air and can remain viable for anywhere from 8 minutes to 3 hours, depending on the scenario.

Some early data suggests that the virus can also live on environmental surfaces for long periods of time, although little is known about how long it remains infectious. While the data is preliminary, the approximate times, by material type, are below:

Material	Examples	Time
Aluminum	Foil, window frames, ladders	2-8 hours
Paper	Mail, tissues, toilet paper, magazines, newspapers	3 hours
Copper	Coins, jewelry, wire	4 hours
Cardboard	Shipping boxes, food packaging	24 hours
Cloth	Bags, bedding, blankets, carpet	2 days
Wood	Furniture, tabletops	2-4 days
Plastic	Light switches, credit cards, food packaging, ATM buttons	3-7 days
Stainless steel	Utensils, keys, pots, door handles	3-7 days
Glass	Glasses, stemware, windows, mirrors	4 days

Appendix D – Daily Self-Screening Questionnaire



DO NOT ENTER THE BUILDING UNTIL YOU HAVE TAKEN THE FOLLOWING QUESTIONNAIRE

Please review the following questions before entering the building. This is a checklist to help ensure that you are not showing signs of a possible COVID-19 infection. This checklist must be performed daily. **If you answer yes to any of the following questions you are not permitted to enter the building.**

Do you have any new and unusual instance of any of the following symptoms:

- Difficulty breathing or shortness of breath? Y/N
- Cough? Y/N
- New loss of taste or smell? Y/N

Have you had contact with anyone that has or is suspected of having COVID-19? Y/N

Have you travelled internationally within the last 14 days? Y/N

If you answered **no** to **all** of the questions above, please enter the building and follow the instructions inside for taking your temperature.

If you answered **yes** to **any** of the questions above:

- You are **not** permitted to enter the building
- Contact your supervisor, Caitlin (248-807-0502) or Brad (616-366-1048)

We sincerely appreciate your help with these efforts!



**DO NOT ENTER THE BUILDING UNTIL YOU HAVE TAKEN THE
FOLLOWING QUESTIONNAIRE**

Please use the attached touchless thermometer to take your temperature. Point the sensor toward your forehead, holding it 1-2" away from the surface. Press the scan button and wait 1 second. Read the temperature on the display.

Is your temperature over 100.4 F?

Y/N

If **no** (your temperature is below 100.4 F), please proceed to work as usual.

If **yes** (your temperature is over 100.4 F):

- You are **not** permitted to enter the building
- Contact your supervisor, Caitlin (248-807-0502) or Brad (616-366-1048)

We sincerely appreciate your help with these efforts!

Appendix E – High-Touch/Shared Surfaces Cleaning Checklist

High-Touch/Shared Surfaces Cleaning Checklist	Date:	Cleaned By:
Building Location & Surface	Cleaned?	
Front doorknob (inside and out)		
Thermometer		
Atrium to office doorknob (inside and out)		
Atrium to shop doorknob (inside and out)		
Reception keyboard and mouse		
Shipping keyboard, mouse, and computer power button		
Light switches		
Reception phone		
Reception printer buttons		
Brad and Caitlin’s office phone		
Brad’s keyboard and mouse		
Caitlin’s keyboard and mouse		
Brad and Caitlin’s office light switch		
Jeff and Ian’s office light switch		
Jeff and Ian’s office doorknobs (inside and out)		
Jeff’s keyboard and mouse		
Ian’s keyboard and mouse		
PAPR chargers		
PAPR batteries		
Locker for respirator filters		
Drawer pulls for PAPR filters		
Black cabinet handles		
Lab doorknob (inside and out)		
Lab keyboard and mouse		
Lab lightswitch		
Airset computer keyboard and mouse		
Toyota steering wheel		
Clark steering wheel		
TCM steering wheel		
Grinding cabinet doors		
Melt computer keyboard and mouse		
Melt refrigerator door		
Melt west man doorknob (inside and out)		
Scale weights and slider		
Desk scale screen		
Melt north man doorknob (inside and out)		
Overhead door controls		
Core area computer keyboard and mouse		
Women’s room doorknob (inside and out)		

Women's room toilet handle	
Women's room sink handles	
Women's room light switch	
Men's room toilet handle	
Men's room urinal handle	
Men's room sink handles	
Men's room light switches	
Slop sink faucet handles	
Slop sink soap dispensers	
Breakroom doorknob (inside and out)	
Breakroom light switch	
Breakroom refrigerator and freezer handles	
Breakroom microwave handles	
Pop machine buttons	
Breakroom tables	
Timeclock surface	
Pattern shop door handle (inside and out)	

Appendix F – Deep Cleaning Checklist

Deep Cleaning Checklist	Date:	Cleaned By:
Specific Areas of Concern:		
Building Location & Surface	Cleaned?	
Items on daily cleaning checklist		
Equipment/tools in employee’s station		
Equipment/tools in employee’s department		
Employee’s locker		

Appendix G – Confirmed Case Contact Records

Exposure Date:		Infected Employee:	
Person Contacted	Exposure Risk/Details	Time Contacted	Date Contacted
Cass County Health Department	<i>Informational Only</i>		
Caitlin McMahan			
Brad Ade			
Jeff Thomson			
Ian Somerville			
<i>Others as needed</i>			

Appendix H – Building Reopening Checklist

Task	Completed?
All areas inspected for damage or changes since building was closed	
Eye wash stations flushed	
Sinks flushed	

Appendix I – FFCRA Poster



The Families First Coronavirus Response Act (FFCRA or Act) requires certain employers to provide their employees with paid sick leave and expanded family and medical leave for specified reasons related to COVID-19. These provisions will apply from April 1, 2020 through December 31, 2020.

► **PAID LEAVE ENTITLEMENTS**

Generally, employers covered under the Act must provide employees:

Up to two weeks (80 hours, or a part-time employee’s two-week equivalent) of paid sick leave based on the higher of their regular rate of pay, or the applicable state or Federal minimum wage, paid at:

- 100% for qualifying reasons #1-3 below, up to \$511 daily and \$5,110 total;
- ⅔ for qualifying reasons #4 and 6 below, up to \$200 daily and \$2,000 total; and
- Up to 12 weeks of paid sick leave and expanded family and medical leave paid at ⅓ for qualifying reason #5 below for up to \$200 daily and \$12,000 total.

A part-time employee is eligible for leave for the number of hours that the employee is normally scheduled to work over that period.

► **ELIGIBLE EMPLOYEES**

In general, employees of private sector employers with fewer than 500 employees, and certain public sector employers, are eligible for up to two weeks of fully or partially paid sick leave for COVID-19 related reasons (see below). *Employees who have been employed for at least 30 days prior to their leave request may be eligible for up to an additional 10 weeks of partially paid expanded family and medical leave for reason #5 below.*

► **QUALIFYING REASONS FOR LEAVE RELATED TO COVID-19**

An employee is entitled to take leave related to COVID-19 if the employee is unable to work, including unable to telework, because the employee:

<ol style="list-style-type: none"> 1. is subject to a Federal, State, or local quarantine or isolation order related to COVID-19; 2. has been advised by a health care provider to self-quarantine related to COVID-19; 3. is experiencing COVID-19 symptoms and is seeking a medical diagnosis; 4. is caring for an individual subject to an order described in (1) or self-quarantine as described in (2); 	<ol style="list-style-type: none"> 5. is caring for his or her child whose school or place of care is closed (or child care provider is unavailable) due to COVID-19 related reasons; or 6. is experiencing any other substantially-similar condition specified by the U.S. Department of Health and Human Services.
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► **ENFORCEMENT**

The U.S. Department of Labor’s Wage and Hour Division (WHD) has the authority to investigate and enforce compliance with the FFCRA. Employers may not discharge, discipline, or otherwise discriminate against any employee who lawfully takes paid sick leave or expanded family and medical leave under the FFCRA, files a complaint, or institutes a proceeding under or related to this Act. Employers in violation of the provisions of the FFCRA will be subject to penalties and enforcement by WHD.



WAGE AND HOUR DIVISION
UNITED STATES DEPARTMENT OF LABOR

For additional information
or to file a complaint:
1-866-487-9243
TTY: 1-877-889-5627
dol.gov/agencies/whd



WH1422 REV 03/20