

**PANDEMIC GUIDANCE DOCUMENT**

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3. OSHA Guidance (Alert May 2020) for Social Distance Requirements at work. See Attachment 24

<https://www.osha.gov/Publications/OSHA4027.pdf>

4. For specific information on self-check of the latest updates, please refer to [www.OSHA.gov](http://www.OSHA.gov)

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## PANDEMIC GUIDANCE DOCUMENT

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### SECTION 17: Vaccine

1. There are a number of pharmaceutical companies that have received FDA approval to start dispensing the COVID-19 vaccine. Since the Calpine workforce is considered essential workers, there are a number of initiatives underway at different levels of government by our legal and Government Regulatory teams to acquire the vaccine for our workforce.
  1. Additional information will be disseminated to the Power Operations team as information and timing of the vaccine become available.
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### SECTION 18: BEST PRACTICES

2. Plants have been randomly submitting best practices in their region. **Attachment 25** is offered for review.
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### SECTION 19: SCHEDULED MEETINGS AND MEMOS

1. The following weekly meetings have been established for review of plant status, open discussion of new topics, and other required communication. (All times are in CST). Meeting days will be adjusted based on need.
    - a. Monday @ 0830 AM: Central Plant Manager Regional Readiness Call
    - b. Tuesday @ 12:00 PM: East Plant Manager Regional Readiness Call
    - c. Monday @ 09:30 AM: North Central Plant Manager Regional Readiness Call
    - d. Monday @ 10:30 AM: West Plant Manager Regional Readiness Call + Rob Parker for Geysers
    - e. Monday @ 04:00 PM: Geysers Readiness Call
  2. MEMO issued by Mike Del Casale to all plant personnel on 26 March 2020 is provided as **Attachment 26**.
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# ATTACHMENTS

## **ATTACHMENT 1; Use of Masks: Recommendations and Guidance Rev 0**

**MASK GUIDANCE  
RECOMMENDED APPLICATIONS  
JANUARY 2021  
FINAL REV 0**

**Objective:** This document is intended to provide the minimum guidelines on when masks shall be worn at work. Individuals may exceed the requirements in this document. Please note that additional requirements may be invoked under local or state jurisdictional requirements that exceed the Calpine requirements. In each instance, the more restrictive requirement will apply.

**Application:** The most effective method of protection from infected/exposed individuals remains social distancing, wearing a mask, and frequently washing your hands (hygiene).

The best information available is that COVID-19 enters the human body through the face (eyes, nose, and mouth). Infection most commonly occurs by touching your hands to exposed surfaces and then touching your hands to your face, (which is why the recommendation is to frequently wash your hands), and through the air from respiratory or speech droplets. (which is what makes social distancing is so critical.)

To slow the spread of the disease, recommended CDC guidance incorporates the use of masks, including homemade cloth face coverings when social distancing is difficult to maintain. A secondary benefit is that wearing a mask may limit the action of touching your hands to your nose and mouth. A mask is not a replacement for washing your hands and social distancing but is an added step of protection.

Masks provide an increased level of protection for you and your family. The COVID-19 risks are real and we need to believe in our value system and hold true to our safety tenants.

Each plant has masks on hand and are readily available for use.

**WARNINGS:**

1. *The use of masks is not a substitute for washing your hands and the continuation of social distancing. In addition, care must be taken when wearing masks. If the mask requires constant adjustment or repositioning on your face, extreme care should be used when touching your hands to your face.*
2. *When selecting a type of mask to be worn, consideration must be given to the fogging of your safety glasses.*

## **Use of Masks**

1. Employees are requested to wear a mask at all time when on site. Employees are required to wear a mask inside all buildings at all times except when in your own office, in a conference room, or work area (including the Control Room) where six (6) feet or more of separation can be achieved. In these situations, the area should be disinfected prior to use and when you leave the area for any reason. Employees are also permitted to remove their masks at meal time but shall follow the same guidelines for sanitizing the area before and after use and shall ensure the proper physical separation is achieved.
2. When outdoors, employees shall wear a mask during the execution of their daily routines or assigned tasks when in the presence of others (Calpine and non-Calpine personnel) even if social distancing criteria of 6 feet or greater can be achieved. It is strongly recommended that each employee continue to wear their mask to maximize their protection when on site.

Each individual is requested to be guarded in their approach and use good judgement in protecting their health. Employees may wear homemade cloth masks made from bandanas, scarfs, or other optional sources.

3. Masks are only effective if properly worn. Please be sure that your mask covers your mouth and nose and fits snugly on the side of your face. Good hygiene should be reinforced whenever placing or removing your mask. Only handle your mask by the ear loops or straps to ensure cleanliness.
4. If there is a local jurisdictional obligation by local or state jurisdictional authorities that exceed the Calpine requirements, the more stringent obligations shall be met.
5. For your added protection, N95 masks are available for your use and are available for times when 6 foot social distancing requirements cannot be achieved. A supply of N95 masks is available at each facility so if elected for use, please maintain your mask appropriately.

## **Other Precautions**

1. Non-cloth face mask may be reused as long as it maintains its structural integrity and the filter material is not damaged, or contaminated with any substance. Please use great care after daily use, to dry masks and preserve them using hair dryers, some other hot air blowers, or other means of sterilization based on the type of mask and store in a plastic bag until the next time you are required to wear the mask.
2. If you are wearing cloth masks, please keep the masks clean so as not to exposure yourself to other contaminants. Wash and clean the cloth masks as required.
3. Please follow all proper protocols for donning and removing your mask using care not to cause an exposure. Wash your hands before and after the process.
4. Raise awareness and keep your PPE sterile and clean. Wash your safety glasses with hot water and soap for 20 seconds like your hands, especially after social distancing is not able to be

maintained.

5. Use care and raise awareness not to lay your mask on common surfaces.
6. Use sterile wipes to clean the inside/outside of your hard hat. Use care if you remove your mask and store it in your hard hat during breaks and meal periods. Be sure to wipe out your hard hat before and after this process. Please sustain a high level of awareness.

**Commitment**

Calpine will review this guidance as CDC information and recommendations become available. We will continue to monitor all of our resources from Calpine facilities and our industry contacts to ensure the safety and health of our team members.

**ATTACHMENT 2; Reporting Form for Management Receiving Contact from Employee**



**Power Plant Operations**

*COVID-19 Reporting Form for Management Receiving Contact from Employee*

<b>Notification Details</b>		
Date and time of notification:		
Employee information:	Name:	
	Job Title:	
Date and time when exposure occurred		
Work Location:		
Person to whom notification was made:	Name:	
	Job Title:	
Last Day Employee was at work facility:		
Has a COVID-19 test been performed and if so, on what date?		
<b>Incident Details</b>		
Notification received via	<input type="checkbox"/> Phone call <input type="checkbox"/> E-Mail <input type="checkbox"/> Text <input type="checkbox"/> Other	
Type of exposure	<input type="checkbox"/> Employee tested positive for COVID-19 (the novel coronavirus) <input type="checkbox"/> Employee exhibiting symptoms consistent with COVID-19 or flu/influenza type symptoms (such as fever, a cough, or shortness of breath) <input type="checkbox"/> Employee's family or household member tested positive for COVID-19 or exhibiting one or more symptoms described above <input type="checkbox"/> Employee has had contact with someone who tested positive for COVID-19 or exhibiting one or more symptoms described above (include as many details as possible below)	

	<ul style="list-style-type: none"> <li><input type="checkbox"/> A family member of someone employee lives with has been in contact with a confirmed or suspected case of COVID-19</li> <li><input type="checkbox"/> Employee reported to work, but notified you while at work that he/she is feeling ill (Complete applicable section below).</li> <li><input type="checkbox"/> Other</li> </ul>
<p>To Complete if Employee Notified you that he/she fell ill while at work</p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Please list the symptoms the employee reported experiencing at work:</li> <li><input type="checkbox"/> What specific locations has the employee worked over the past 72 hours while on site?</li> <li><input type="checkbox"/> Has the employee been using a mask during his/her time on site?</li> <li><input type="checkbox"/> Has the employee worked within 6 feet of any other employees? Include in the response all PPE that was in use and the total duration of time with each individual where PPE was not in use over the past 72 hours.</li> <li><input type="checkbox"/> Where did the employee take break and lunch?</li> <li><input type="checkbox"/> If known, which restroom did the employee use? Please include specific locations near location of his /her work.</li> </ul>
<p>Summary (Include all details. Do not speculate, quiz or ask specifics about employee medical situation, For secondary exposure, get as many details related to event, testing status, the status of the person contacted (self-quarantine etc. for use in determining next steps) and how the event occurred. Reminder that we cannot ask specific health questions but we can question circumstances:</p>	



<p><b>NOTES:</b></p> <p>As part of this summary, please ask the employee if he/she can confirm that during all time on site that they conformed to the mask requirements as outlined in the Pandemic Guidance, followed all social distancing protocols, and did not take any action to expose anyone with whom they came in contact at work. This would include all contact in lunch and break rooms, control rooms, individual offices, conference rooms, etc.</p> <p>What is the employee's answer to the above question?</p>	
<p>Response to employee (if you find cause for the employee to stay home):</p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Instruct the employee NOT to physically report to work</li> <li><input type="checkbox"/> If the employee is reporting his/her own illness, instruct the employee to seek medical advice</li> <li><input type="checkbox"/> Inform he/she will be contacted by their HRBP to provide further information</li> <li><input type="checkbox"/> Secure best contact number to reach employee</li> </ul> <p>Phone number: _____</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Tell employee to remain at home, take care and do not report to work until he/she receives clearance from his/her management team and HRBP to return to work</li> <li><input type="checkbox"/> Instruct the employee that their time will be recorded as PTO</li> </ul>
<p><b>Corrective Actions</b></p>	

<input type="checkbox"/> Immediately notify plant leadership, RVP & HRBP to report the situation <input type="checkbox"/> Determine where the individual has been working since his/her exposure or 3 days if he/she is showing symptoms (if Mechanic or Tech, tape areas around the individuals tools. If there is a community toolbox, use gloves and wipe down all tools.) <input type="checkbox"/> Sanitize all work areas that the employee could have been in contact with since the exposure or over the past 3 days if he/she is showing symptoms. <input type="checkbox"/> Interview employees who may have been in close contact with the employee that are identified above to complete contact tracing on those that were exposed. (Closer than 6 feet, and the cumulative exposure time was 15 minutes or greater over a 24 hour period ) over the prior three (3) days if employee is showing symptoms. Based on any exhibited symptoms or circumstances for the contacted individuals, further isolation and communications may be required. <input type="checkbox"/> Continuously reinforce all protocols and hygiene standards <input type="checkbox"/> Apply any other prudent steps based on conditions and industry guidance <input type="checkbox"/> Send e-Mail communication to all employees working at the same plant (Plant			
Requested/required follow-up action(s) or other relevant information:			
Report prepared by:		Signature:	

Please submit a copy of this completed form to your HRBP

**ATTACHMENT 3; Steps to be taken in Response to an Employee reporting COVID-19 Infection,  
Symptoms, or Exposure**



## **Power Plant Operations**

### **Steps to Be Taken in Response to Employee Reporting COVID-19 Infection, Symptoms or Exposure**

*Instructions for Plant Manager, Supervisor or Other Member of Management Receiving Contact from Employee*

1. In the coming days or weeks, a Plant Manager or direct supervisor or another member of Calpine management might receive a call, email, or text from an employee indicating the following:
  - a. The employee has tested positive for COVID-19 (the novel coronavirus).
  - b. The employee is exhibiting symptoms consistent with COVID-19 or the flu (such as fever, chills, a cough, or sore throat).
  - c. The employee has a family member or another member of the household that either has tested positive for COVID-19 or is exhibiting one or more of the symptoms described above.
  - d. The employee has had contact with some other individual who has tested positive for the COVID-19 virus or is exhibiting one or more of the symptoms described above.
  - e. A family member of someone you live with has been in contact with a confirmed case or suspected case of COVID-19

(Notably, if you do not hear from the employee directly but rather from a coworker or another person that any of the circumstances described above apply to an employee, you should immediately contact your plant leadership. Plant leadership should then concurrently reach out to their RVP and HR Business Partner for direction).
2. In the event you receive this kind of communication, whether it be a phone call, email or text, from an employee describing one of these situations, please write down the information the employee provides to you.
3. You should not quiz or otherwise ask the individual for more specifics about his or her specific medical situation. For situations of secondary exposure, please get as many details as possible regarding testing status, self-quarantine, etc for use in determining next steps.

4. You instead should advise that individual, particularly if he or she is exhibiting symptoms or has been exposed to someone who has tested positive for COVID-19 or is exhibiting symptoms, to seek the prompt advice of the individual's health care provider.
5. You should inform the employee that you will have their HR Business Partner contact the employee to further discuss the concern, provide further information, and see what Calpine can do to help.
6. So that this follow-up communication from the HR Business Partner to the employee is readily achievable, please ask the employee about the best way to reach he or she on that particular day and the following day. (Assure that you receive very clear good contact information such as any and all important phone numbers).
7. Tell the employee to remain at home (unless specifically visiting a health care provider), take care of themselves, and do **not** report to work until he or she receives specific clearance from an HR Business Partner to return to work. Instruct the employee that their time will be recorded as PTO.
8. Immediately notify plant leadership, RVP, and call your HR Business Partner to report the situation and have your notes ready so you can describe in detail what you learned. (If you cannot reach the HR Business Partner on her or his cell phone, leave a voice message and then immediately send that HR Business Partner an email about the situation providing as many details as you can). Chart of HRBP contact information is attached to this document.

The Plant personnel shall immediately perform the following tasks;

- a. Determine where the individual has been working for the last 3 days. (If Mechanic or Tech, tape areas around the individuals tools. If there is a community tool box, and the individual would have had need to be in there, please use gloves and wipe down all tools.
  - b. All work areas shall be sanitized by cleaning staff or other acceptable methods.
  - c. Interview employees who may have been in contact closer than 6 feet over the prior 3 days. Based on any exhibited symptoms or circumstances, individuals may need to be isolated.
  - d. Continuously reinforce all protocols and hygiene standards.
  - e. Apply any other prudent steps based on conditions and industry guidance.
9. If employee reports that he or she (i)

- a. has tested positive for COVID-19,
- b. is exhibiting symptoms consistent with COVID-19, or
- c. has been exposed to a family member or another person who has tested positive for COVID-19 or is exhibiting symptoms consistent with COVID-19. then the following communication should be made, by the Plant Manager via electronic mail, to all employees working at the same plant: (The HR Business Partner will help the PM develop the communication.)

General guidelines on talking points. **Note that there will be multiple potential scenarios and we cannot capture them all here, but the following can be tailored according to the specific scenario.**

*“Out of an abundance of caution, we want to make you aware of the following:*

*One of your coworkers has been [insert as appropriate, tested positive for COVID-19, exhibited symptoms consistent with COVID-19, or been exposed to an individual testing positive for COVID-19 or exhibiting symptoms consistent with COVID-19*

*All employees assigned to your plant are receiving this communication - not just you or some limited group of plant employees.*

*As you may choose, you may want to contact your healthcare provider to inform that healthcare provider of this development*

*We are implementing all necessary precautions such as sanitizing the work area and practicing social distancing.*

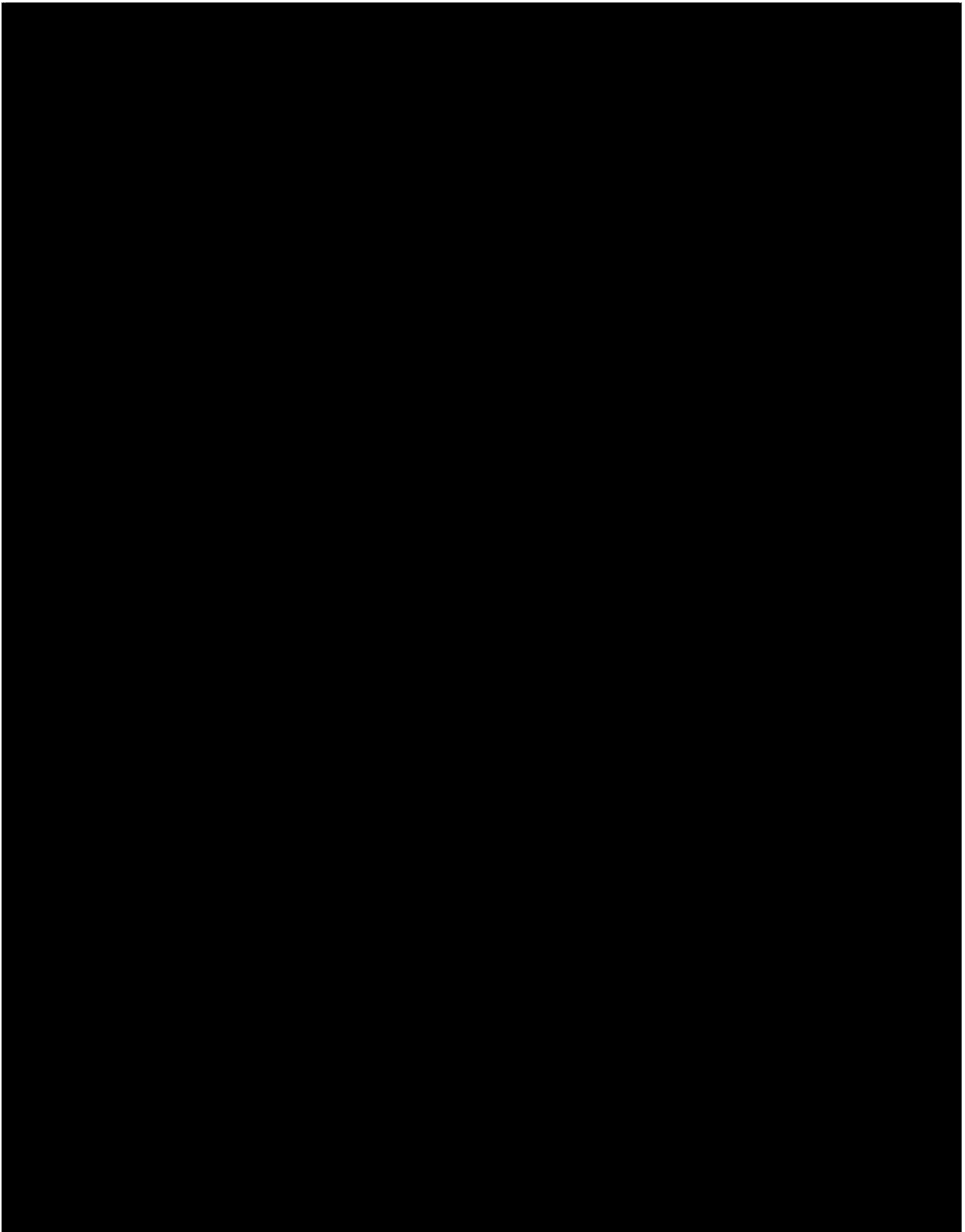
*Again, we are just making this communication to all plant employees out of an abundance of caution.*

*If you have questions, please contact me at my cell telephone number \_\_\_\_\_ or at my email address \_\_\_\_\_.*

*I am ready to answer any questions. The health and safety of Calpine employees is our number one priority and we are always ready to address any questions or concerns you may have.”*

**Attachment 4; PTO Reimbursement Request (Non-Union)**

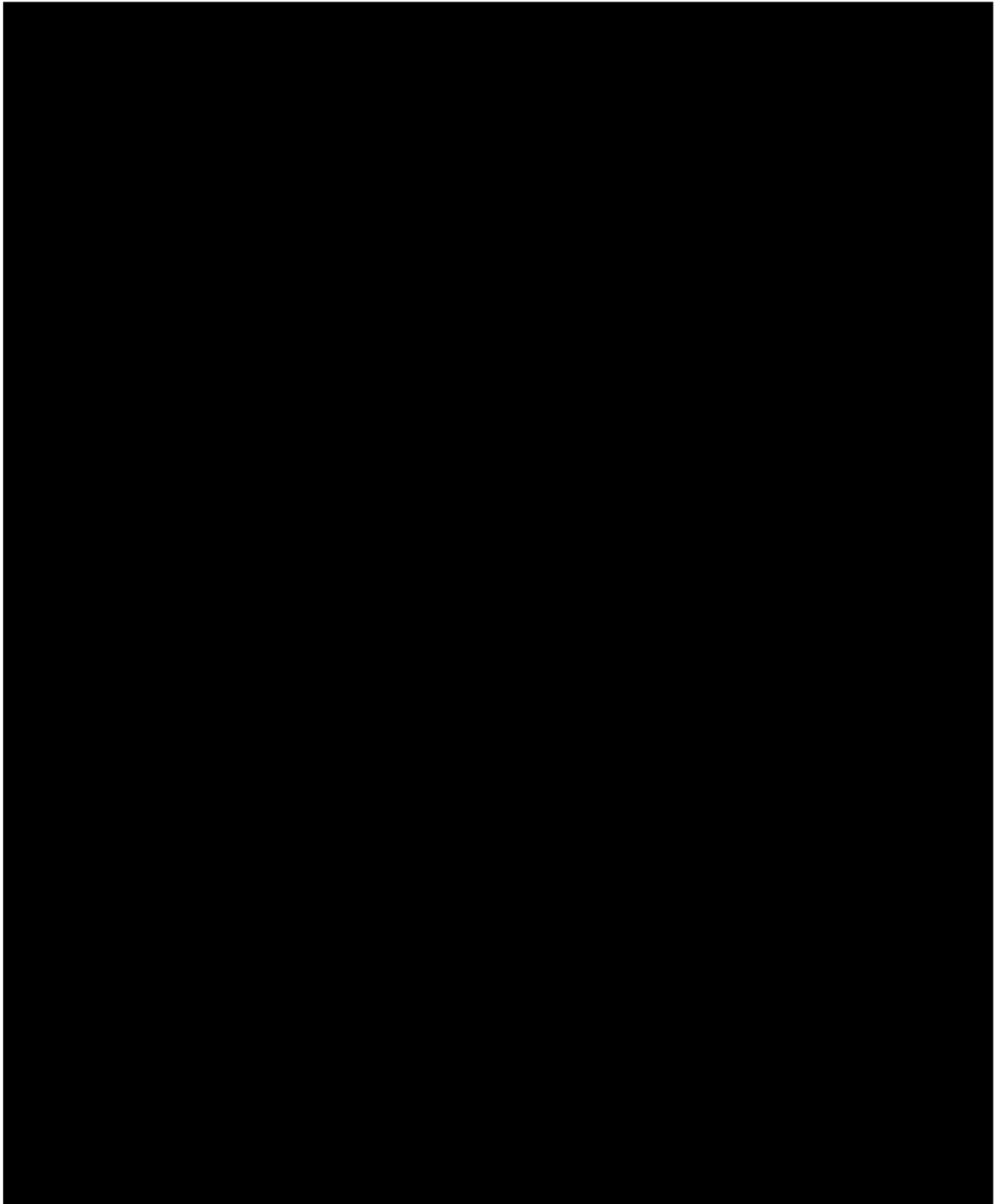
**\*\*\*\*\*PLEASE GO TO THE ONE CALPINE COVID PAGE FOR THE CURRENT VERSION\*\*\*\*\***





**Attachment 5; PTP Reimbursement Request (Union)**

**\*\*\*\*\*PLEASE GO TO THE ONE CALPINE COVID PAGE FOR THE CURRENT VERSION\*\*\*\*\***



## **ATTACHMENT 6; Administration Building Access Guidelines**

**ADMINISTRATION BUILDING ACCESS CONTROLS  
GUIDELINES  
JANUARY 2021  
FINAL R0**

**Objective:** This document is intended to provide requirements for access and process controls to be applied and implemented in the plant Administration Buildings (“Admin building”).

**Application:**

The most effective method of protection from infected/exposed individuals remains social distancing and frequently washing your hands. The best information available is that COVID-19 enters the human body through the face (eyes, nose, and mouth). Infection most commonly occurs by touching your hands to exposed surfaces and then touching your hands to your face, which is why the recommendation is to frequently wash your hands, and through the air (from respiratory or speech droplets), which is what makes social distancing so critical.

To slow the spread of the disease, and to protect the health of our plant teams, there is a need to isolate the administration buildings and even more so, the Control rooms from all non-essential business and internal and external visitors.

Plants are required to take the necessary precautions to isolate the plant work force from the contracted work force by setting up dedicated area for LOTO, breaks, and lunch rooms. Plants may, to support this effort, rent additional trailers and work spaces to execute this objective. If elected, plants are authorized to charge the Pandemic Cost codes developed for each plant.

**Administration Building**

1. No contractors shall enter the Admin building. Only plant staff should be permitted in Admin building unless specifically authorized by the Plant Manager. In all cases, plant personnel shall meet or exceed all incremental steps for social distancing, wearing masks, hand washing and other best practices.
2. For plants that have uniquely configured Administration buildings that are used for a combination of purposes, the Admin Building is considered to include all Administrative staff offices (Admin, BM, PM, OPS Manger, Maintenance Manager offices), all conference rooms, lunch and break rooms, locker rooms, and rest rooms within the work area. In addition, this will include all access and egress points to the Control Room. If there is any doubt, please review with your RVP. In addition, the PM/GM may increase the controlled area as required.
3. Plant visitors that are approved to enter the Admin building by the Plant Manager, if not familiar with the expectations, shall receive an additional orientation using the RTW document. A visitor is someone who will be on site for 1 day or less. Each and every visitor shall have their temperature

checked. If the employee does not have an individual thermometer, the PM or plant contact shall offer a portable forehead thermometer or alternatively, have their temperature checked at the gate or by a member of the plant staff or third party assigned the monitoring tasks..

4. Calpine staff that are on site to support maintenance tasks shall require specific orientation using the Return to Work Document (RTW) and shall be expected to follow all plant protocols. If the employee does not have an individual thermometer, the PM or plant contact shall offer a portable forehead thermometer or alternatively the employees shall have their temperature checked using a non-contact thermometer by a member of the plant staff. Depending on the scope and time on site, a temporary trailer or other suitable work area outside the Administration building may be required if adequate office space is not available.
5. Any Calpine employee and visitors that were specifically approved by the PM to enter the Administration Building shall comply with all expectations for social distancing, hygienic measures, and shall wear a mask in accordance with the most recent guidance. If conditions are not met, the PM can request the visitor leave the property. Any Calpine employee asked to leave shall be reported to your RVP.
6. All visitors to your plants must be scheduled and business essential. The PM shall review any request for plant visits and confirm the work is essential for the plant needs. The RVP's are available to consult and discuss any concerns. All visitors shall complete the COVID-19 Visitor Questionnaire.

#### **Control Room**

1. Access to the Control Room shall be restricted to the control room operators and or on emergent basis, additional operating personnel and plant leadership on an as needed basis to support operations or monitor emerging conditions. The goal is to keep plant control operators isolated and healthy. If entry is required, all Pandemic protocols shall apply and all parties shall wear masks regardless of social distance requirements that can be achieved.. Any areas that are touched shall be cleaned when leaving.
2. If the Control Room was the plant's shelter in place requirement, please identify a new location where contractors and employees can be secure. This may be trailers or other locations.
3. Shift Turn-Over / Control Room Hygiene Protocols
  - a. The outgoing shift should wipe down the control room
  - b. The incoming shift should remain isolated from the outgoing shift by staying in an isolated location.
  - c. All details and shift turn over shall be by phone and using the logs. A dedicated conference room or some other area should be used. It will need to be wiped prior to use by the outgoing shift and also wiped down when use is completed.

- d. Individuals that turn over in labs or other areas shall follow the same procedures.
- e. Incoming shifts shall wipe down control rooms and all incoming areas.
- f. Repeat at each shift turnover.
- g. Require Control Room Operators to frequently wipe down all surfaces and key boards at the start and end of each shift (as a minimum)

#### **LOTO and Other Work Activities**

##### **4. LOTO Discussion**

- a. Minimize interaction in close proximity
- b. Maximize use of satellite lock boxes where and when possible
- c. Plant should consider placing lock on Master LOTO box
- d. Personnel will continue to be required to personally sign onto LOTO documents
- e. Establish separate LOTO area outside control room. For contracted work, a LOTO area outside the Admin building will be required.
- f. Use gloves and other PPE to ensure minimum contact.
- g. Create safe working areas using plexiglass or other methods for barriers.
- h. Only one individual shall be serviced at a time. All others need to stand back and retain a minimum of 6 feet of physical distance

Safe work and hot work permits shall be developed and issued using similar methods to the LOTO permits.

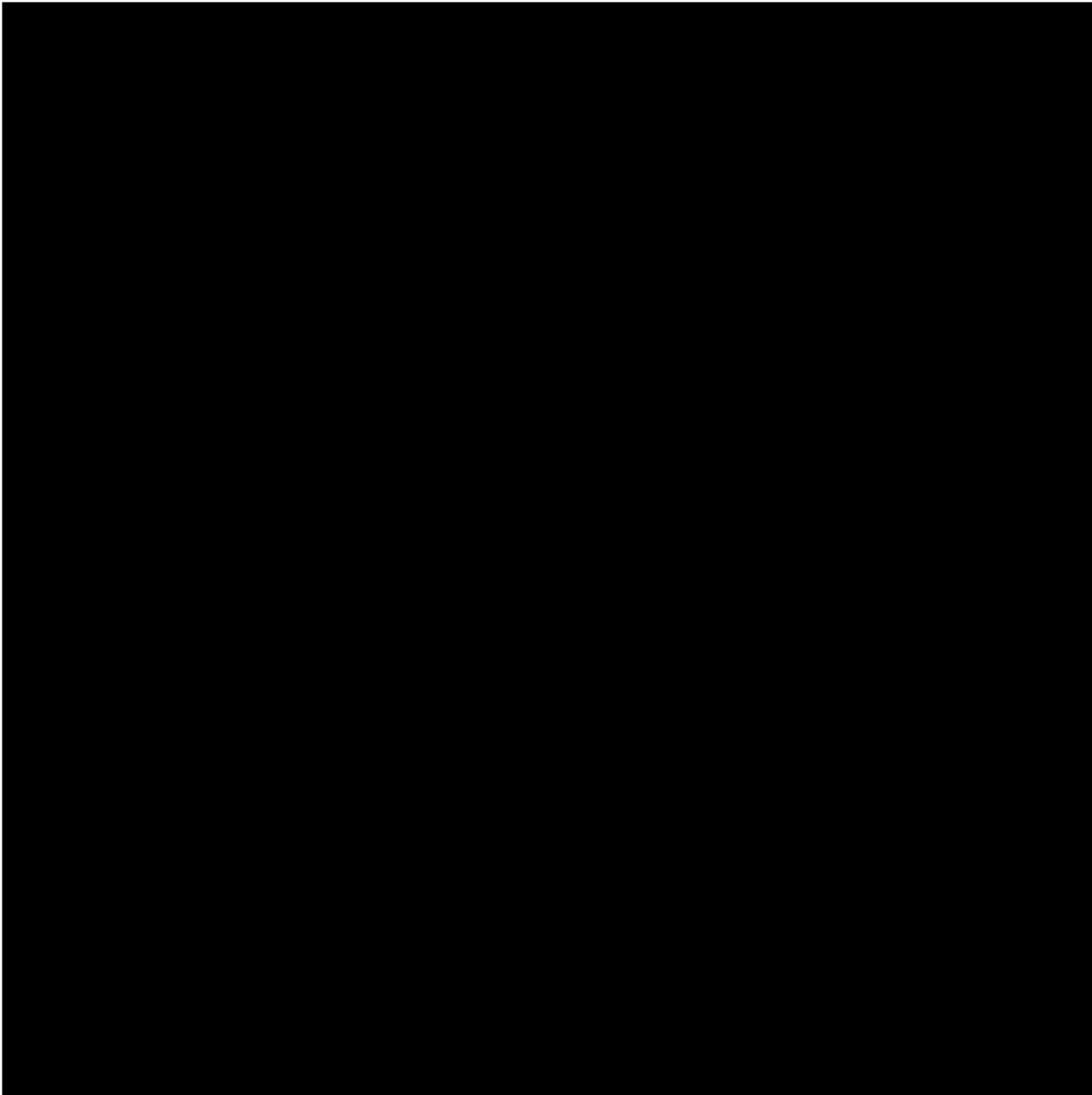
#### **Required Maintenance**

The need to perform maintenance and/or repair work in the control room will increase as COVID-19 precautions continue to extend. Although all plant configurations differ, in the event a 3<sup>rd</sup> Party contractor or external Calpine personnel need to come into the control room to conduct maintenance, the following processes shall apply;

- 1. Work scope and requirements need to be reviewed
- 2. The affected area required for to complete the maintenance or repair activities needs to be laid out. During this evaluation, include access and egress requirements for personnel, and equipment and material.
- 3. Masks must be worn by all those accessing the area
- 4. Social distancing requirements, even with a mask, must be observed
- 5. Areas should be wiped down at the start of work, break times, lunch, and at the end of each shift.

**ATTACHMENT 7; PTO Sell Form**

**\*\*\*\*\*PLEASE GO TO THE ONE CALPINE COVID PAGE FOR THE CURRENT VERSION\*\*\*\*\***





**ATTACHMENT 8; Work From Home Tracking Sheet**

1. Please complete the form for individuals at your plant that have been working from home on a full or part time basis. The EHS members will be managed through the EHS team.
2. For individuals that remain out, please just estimate a Return to Service
3. Some team members have been coming in on alternate schedules to support outages. For those employees, please have the employee complete the supplemental section
4. If there are any questions, please reach out to your HRBP.

DESCRIPTION	INFORMATION
Plant / EHS Department	
Employee Name:	
Employee ID No.	
Title	
Date Began Working from Home	
Date Returned to Work / Est return to work	

[illegible]

**ATTACHMENT 9; Pandemic Check Sheet (March 12, 2020)**

TASKS		STATUS	COMMENTS / UPDATES
I.	Safety - Reinforce Safety Expectation and Performance		
a.	We will not deviate from our value system. Our first obligation will remain to keep our personnel safe, protect the environment, and to preserve our equipment.		The action here is to confirm that our safety requirements have not changed, we need to follow our Aspire value system and our policies and procedures.
b.	During any step of the process, if we deem unsafe operating conditions, we will authorize the managers on site to shut down equipment until proper personnel or equipment conditions can be remediated		
c	Continue to monitor each other and make sure we protect ourselves from any exposure and protect our teams. No one is to take un-necessary risk		
II.	Preventative Measures - Review basic precautions with all team members		
a.	Reinforce basic steps that would be applied to prevent the spread of influenza virus		
b.	Follow all corporate guidelines regarding sickness, potential exposure, or other impacts. The HR Business partners and RVP are the first source for guidance in all sceneros		
c	Set up hand sanitizers at key locations throughout the plant		
d.	Stock cleaning supplies for an extended duration (30 – 60 days)		
e.	Eliminate non-critical sales calls and visits to the plant		

f,	Meeting with cleaning crews and review the use of sanitizers and cleaning products used to ensure they kill germs and contain alcohol or other key ingredients.		
g.	Require Control Room Operators to frequently wipe down all surfaces and key boards at the start and end of each shift (as a minimum)		
h.	Wipe down all surfaces and where required use gloves when interacting with contract personnel		
i.	Reduce face to face interactions and hand shaking		
j.	Contact doctors/pharmacy for extra 30 day supply of medication (Personal Recommendation)		
k.	If the meeting is required with OS, Engineering, or EHS, consider phone or video conferences		
l.	Recommend team members maintain a personal stock at home – N95, hand sanitizer, alcohol, etc.		
m.	For social concerns, a recommended social distancing of 6 feet to mitigate exposure.		
n.	Clean your PPE at the start of each shift and based on activities and exposures, during each shift as required.		
III.	Other Preparation Activities		
a.	Review BCMT documents and plan for an extended sequestration process.		Each plant is to confirm their response plans are current.
b.	Establish provisions for basic subsistence for hygiene, rest, and food supplies		
b.1	Do we need to rent and stage RV's at the plant [PM and RVP to manage]		

c.	Install or add freezers and/or refrigerators to allow for bulk storage of food to meet needs.		A minimum of 2 weeks of food is recommended
d.	Make sure there is an excess supply of toiletries, soap for showering, shampoo's, sanitizing and cleaning equipment		
d.1	Remember the concept is to prevent and isolate the plant from the outside world.		
e.	Based on preferences at each plant, establish a location for employees to decompress after working a shift.		
e.1	Could be movies, cards, games, video games, etc		
f.	Have Business Managers and/or Planners reach out to suppliers and set up secondary suppliers for consumables		
g.	Keep Chemical supplies topped off		
h.	For plant purchased materials, please reach out to suppliers to make sure deliveries are not impacted. Identify scopes and risk for any items that are identified.		
i.	Review key delivery schedule for outage parts and material. In the event of a pandemic, and outage is deferred due to lack of resources, be prepared for short term storage and preservation of material		
i.1	May include coatings, tarps, excess cribbing, etc		
IV.	Plant Staffing		
a.	Implementation will be declared on a plant by plant basis working with the BCMT and the location of the virus in the country.		

b.	Draft Plan for each facility - modifications are allowed but shift change durations should be as long as reasonably possible		
b.1	Work 7 days on, 7 days off		
b.2	2 qualified shifts at the site (Make Roster for all shifts)		
b.3	2 qualified shifts at home resting (Make Roster for all shifts)		
b.3.i	We would need to encourage the "at home" employees to stay as isolated as possible to ensure readiness for each shift.		
b.4	Maintenance staffs would be split between 7 day "A" and "B" shifts		
b.5	Plant and Line managers would split. PM would be assigned to the "A" shift, the Ops and MM would be assigned to the "B" Shift		
b.6	All non-essential personnel would work from home (BM, Admins, etc)		
c.	c. Cross Training		THIS IS ON HOLD AT THIS TIME
c.1	A supplemental shift would be trained using personnel from a nearby plant.		
c.2	Key personnel from the "B" shift at each facility will be cross trained at a nearby facility. In the event that an individual were affected, a replacement would be available		
c.3	In the event additional ICE techs or Mechanics were needed, we would dispatch individuals from non-affected plants or regions. Travel plans would need to be scrutinized.		

d.	Identify Plant for Cross Training Teams		THIS IS ON HOLD AT THIS TIME
e.	Develop Key Training Roster		THIS IS ON HOLD AT THIS TIME
f.	Plant Staffing – Geysers (Make Roster for all shifts)	N/A	FOR THE GEYSERS ONLY
f.1	Allocate Geysers Operating Teams into 4 shifts	N/A	
f.2	Based on allocation, break out a 5 <sup>th</sup> partial shift for relief	N/A	
f.3	Allocate Ops Managers per shift	N/A	
f.4	Maintenance staff will be proportioned across the shift allocation	N/A	
f.5	Similar strategy to be in effect for Steam Field	N/A	
f.6	Similar strategy to be in effect for Control 1	N/A	
g.	For Union Plants, the RVP and PM's shall set up meeting with local union representation to discuss execution plans		
V.	EHS Team		
a.	Develop a procedure including required PPE for receiving chemical or other material deliveries to the site in the event a Sequestration event is declared.	For Information Only	
b.	Work with BCMT to provide daily updates on virus status, CDC updates, local and regional key information	For Information Only	
c.	Develop process with Cyber Security team to gain access to all CEMs DAS systems to allow for uninterrupted reporting to all state and federal agencies to prevent the need for plant visits.	For Information Only	



d.	EHS team will present a recommended Sanitation Procedure	For Information Only
VI.	Sourcing Team	
a.	Reach out to Chemical suppliers to inquire about preparations being put in place to insure an uninterrupted supply of chemicals in the event a Pandemic is declared	For Information Only
b.	Reach out to secondary suppliers in the event a break in service were to occur and establish blanket agreements.	For Information Only
c.	Confirm all Calpine facilities have Tier I designations for chemical deliveries	For Information Only
d.	Work with local BM to identify potential sources for leasing RV's if deemed necessary.	For Information Only
VII.	HR Benefits / Prescription Drugs	
a.	Review any restrictions on having individuals obtain additional advances on prescription drugs	For Information Only
b.	Develop pay practices for plant personnel not working to ensure readiness.	For Information Only
VIII.	Other Activities - Talking Points	
a.	Regional Cost codes for labor, training, and material purchases will be issued today. Costs will be rolled up to the CPO level but will be traceable and reports will be generated for each plant.	For Information Only
b.	OS and Engineering will be preparing execution plans to allow for continued support based on critical work	For Information Only

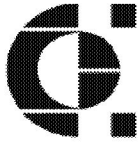
c.	All of the Shared Services team will be assessing their personnel for who can effectively work from Home	For Information Only	
d.	SCS will be distributing a memo to all BM for working details with vendors. (See attachment)	For Information Only	
e.	In the event of a pandemic, there is an expectation that maintenance activities could be deferred.	For Information Only	
e.1	OS will need to prioritize work scope if limited resources are available	For Information Only	
e.2	We will need develop an isolation program if 3 <sup>rd</sup> party contractors are required on site	For Information Only	
e.3	Plant and OS teams need to review key deliveries and monitor milestone dates to ensure readiness for extended storage and preservation.	For Information Only	
IX.	ATTACH ROSTERS	STATUS	COMMENTS / UPDATES
	'A' - Shift (Days) / Include Manager		
	'A' - Shift (Nights)		
	' B' - Shift (Days) / Include Manager		
	' B' - Shift (Nights)		
	Cross Training Roster		THIS IS ON HOLD AT THIS TIME

## **ATTACHMENT 10; Cost Template for Pandemic Costs**

## PANDEMIC COST SHEET

Sequestration:													
	Jan	Feb	Mar	April	May	Jun	July	Aug	Sep	Oct	Nov	Dec	FY Forecast
RV Trailer Rentals	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast
Set up and Demob cost for RVs													-
Other rental equipment													-
Infrastructure Improvements													-
Non outage related equipment													-
Consumables													-
Sleeping Equipment, towels, rugs, etc													-
Sanitation Services													-
PPE													-
	0	0	0	0	0	0	0	0	0	0	0	0	-
Outage Support Cost for Social Distancing													-
Additional Office/OTO/Break Area for Contractors													-
Setup Costs for additional office/OTO/Break Area													-
Additional Rental (include fuel)													-
Gate Attendant Temperature Monitoring													-
Sanitation Services													-
Other Plant equipment													-
	0	0	0	0	0	0	0	0	0	0	0	0	-
	0	0	0	0	0	0	0	0	0	0	0	0	-
Total	0	0	0	0	0	0	0	0	0	0	0	0	0

**ATTACHMENT 11; Temporary Worker/Independent Contractors (contingent workforce)**



## Calpine Corporation

March XX, 2020

To Whom It May Concern:

This letter is to verify that [CONTRACTOR NAME], is employed by [CONTRACT AGENCY NAME] and currently working a contract assignment for Calpine Corporation at our [PLANT NAME] located in [CITY, ST].

Calpine is engaged in electricity production and provides an essential service in ensuring the reliability of America's electricity grid. [CONTRACTOR NAME] performs critical services to ensure the on-going operations of Calpine Corporation and is required to travel to and from work at Calpine Corporation as well as to and from any necessary supplier, vendor or third-party that provides essential support for the operation and maintenance of our electrical generation facilities.

If you have any questions regarding the information provided, please do not hesitate to contact me at [PLANT MANAGER TELEPHONE] or via email at [PLANT MANAGER E-MAIL].

Sincerely,

PLANT MANAGER NAME  
TITLE

## **ATTACHMENT 12; Shop Services, Contractors, Vendors or Other 3<sup>rd</sup> Party Service**





## Calpine Corporation

March XX, 2020

To Whom It May Concern:

This letter is to verify that [INDIVIDUAL NAME], is employed by [REPAIR SHOP NAME] and currently performing services for Calpine Corporation at our [PLANT NAME] located in [CITY, ST].

Calpine is engaged in electricity production and provides an essential service in ensuring the reliability of America's electricity grid. [REPAIR SHOP NAME] performs critical services to ensure the on-going operations of Calpine Corporation and is required to travel to and from work at Calpine Corporation as well as to and from any necessary supplier, vendor or third-party that provides essential support for the operation and maintenance of our electrical generation facilities.

If you have any questions regarding the information provided, please do not hesitate to contact me at [PLANT MANAGER NAME] or via email at [PLANT MANAGER E-MAIL ADDRESS].

Sincerely,

[PLANT MANAGER NAME]  
[PLANT MANAGER TITLE]



## Calpine Corporation

March XX, 2020

To Whom It May Concern:

This letter is to verify that [REPAIR SHOP NAME] is currently performing services for Calpine Corporation at our [PLANT NAME] located in [CITY, ST].

Calpine is engaged in electricity production and provides an essential service in ensuring the reliability of America's electricity grid. [REPAIR SHOP NAME] performs critical services to ensure the on-going operations of Calpine Corporation and is required to travel to and from work at Calpine Corporation as well as to and from any necessary supplier, vendor or third-party that provides essential support for the operation and maintenance of our electrical generation facilities.

If you have any questions regarding the information provided, please do not hesitate to contact me at [PLANT MANAGER NAME] or via email at [PLANT MANAGER E-MAIL ADDRESS].

Sincerely,

[PLANT MANAGER NAME]  
[PLANT MANAGER TITLE]

**ATTACHMENT 13; COVID-19 Questionnaire for Visitors (English)**



### COVID-19 Questionnaire for Visitors/Contractors

For the purpose of the health protection of all employees and visitors, no person suspected of being COVID-19 infected should access Calpine facilities. All Calpine premises should avoid non business-related visitors for the time being.

This questionnaire must be filled in completely and truthfully and signed by every visitor who wants to receive access.

If the questionnaire has not been filled-in completely or if questions numbered 1 through 5 have been answered with "YES", access must be denied.

#### Visitor Information:

Last Name:		First Name:	
Phone Number:		Email:	
Company:		Location:	
Invited By:			
Date:			

#### COVID-19-related Questions:

	Question	Yes	No
1.	Is your visit non business-related?	<input type="checkbox"/>	<input type="checkbox"/>
2.	Have you conducted personal travel in the past 14 days to a location outside your work or residence state or county that has jurisdictional travel restrictions or outside the United States?	<input type="checkbox"/>	<input type="checkbox"/>
3.	Within the last 14 days, have you knowingly been in close contact (within 6 feet for 15 minutes or more) with someone who has tested positive for COVID-19?	<input type="checkbox"/>	<input type="checkbox"/>
4.	Within the last 14 days, have you tested and been found positive for COVID-19?	<input type="checkbox"/>	<input type="checkbox"/>
5.	Are you currently experiencing influenza-like symptoms, such as fever or chills and cough or sore throat?	<input type="checkbox"/>	<input type="checkbox"/>
6.	Do you agree to report to your Calpine site contact any changes in your physical symptoms or exposure to confirmed cases of	<input type="checkbox"/>	<input type="checkbox"/>

	COVID-19 for the duration of your visit(s) to Calpine?		
--	--	--	--

Signature Visitor: \_\_\_\_\_

Date: \_\_\_\_\_

**REMINDER: All individuals on this site should maintain a minimum six-foot distance from one another, practice increased hygienic steps such as washing their hands more frequently, sneezing into a tissue or their elbow, and not shake hands or engage in any unnecessary physical contact.**

Approval (to be completed by Calpine party)
Access has been granted: YES <input type="checkbox"/> NO <input type="checkbox"/>
Date and Signature Reception Desk or Inviting Host:

**ATTACHMENT 14; COVID-19 Questionnaire for Visitors (Spanish)**



### Cuestionario sobre COVID-19 para visitantes y contratistas

Con fines de protección de la salud de todos los empleados y visitantes, ninguna persona que se sospecha que está infectada con COVID-19 debería acceder a las instalaciones de Calpine. Por el momento, todas las instalaciones de Calpine deben evitar las visitas ajenas a la actividad comercial.

Cada visitante que desee recibir acceso deberá llenar este cuestionario de forma completa y sincera y deberá firmarlo.

Si el cuestionario no ha sido completado en su totalidad o si ha respondido "Sí" a las preguntas numeradas del 1 al 5, el acceso deberá ser denegado.

#### Información del visitante:

Apellido:		Nombre:	
Teléfono:		Correo electrónico:	
Compañía:		Ubicación:	
Invitado(a) por:			
Fecha:			

#### Preguntas relacionadas con el COVID-19:

	Pregunta	Sí	No
1.	¿Su visita es ajena a la actividad comercial?	<input type="checkbox"/>	<input type="checkbox"/>
2.	¿Ha realizado algún viaje personal en los últimos 14 días a un lugar fuera de su estado o condado de residencia o trabajo que tenga restricciones de viajes jurisdiccionales o fuera de los Estados Unidos?	<input type="checkbox"/>	<input type="checkbox"/>
3.	En los últimos 14 días, ¿ha estado a sabiendas en contacto estrecho (menos de 6 pies [2 m] durante 15 minutos o más) con alguien que haya resultado positivo para COVID-19?	<input type="checkbox"/>	<input type="checkbox"/>
4.	En los últimos 14 días, ¿se ha sometido a la prueba de COVID-19 y ha resultado positivo?	<input type="checkbox"/>	<input type="checkbox"/>
5.	¿Actualmente está experimentando síntomas parecidos a los de la gripe, como fiebre o escalofríos y tos o dolor de garganta?	<input type="checkbox"/>	<input type="checkbox"/>

6.	¿Acepta informar a su contacto de Calpine de cualquier cambio en sus síntomas físicos o exposición a casos confirmados de COVID-19 durante su(s) visita(s) a Calpine?	<input type="checkbox"/>	<input type="checkbox"/>
----	---	--------------------------	--------------------------

Firma del visitante: \_\_\_\_\_

Fecha: \_\_\_\_\_

**RECORDATORIO:** En este lugar, todas las personas deberán mantener una distancia mínima de seis pies (dos metros) entre sí, mantener mayores medidas de higiene como lavarse las manos con más frecuencia, estornudar en un pañuelo descartable o en el codo y no estrecharse las manos ni tener contacto físico innecesario.

Aprobación (deberá ser completada por un integrante de Calpine)
Se ha otorgado el acceso: SÍ <input type="checkbox"/> NO <input type="checkbox"/>
Fecha y firma de un integrante de la Recepción o del anfitrión que realizó la invitación



## **ATTACHMENT 15; Temperature Screening for Contractors / Visitors**

**TEMPERATURE SCREENING FOR CONTRACTORS/VISITORS  
GUIDELINES  
JANUARY 2021  
FINAL R0**

**Objective:** The document is intended to provide guidance to screen all contractors and visitors entering the Calpine Generating Facilities.

**Application:** The temperature screening applies to all contractors and visitors to the Calpine Property. Note that all Calpine employees (plant and non-plant) may be excluded from gate screenings but shall be required to complete a temperature measurement prior to starting work. If gate screenings are established, Calpine visitors may elect to go through the screening process. Please note, the Calpine visitor may also request a forehead thermometer to allow the employee to self-monitor their temperatures.

**Recommended Use**

There are a number of different temperature measurement devices currently in use across the fleet. Regardless of the type of device, it is the expectation that the individual executing the measurement know the details of how the device functions and its proper use.

Where self-check stations are established for employees and Calpine visitors, please be sure to include a set of instructions at the self-check station.

Generally, the non-contact thermometers should be used 1.5-2.5 inches from the temple of the person being tested. If equipped with a laser, the laser should be turned off. The measurement should take 1 – 2 seconds.

**Contractor and Visitor Temperature Measurements:**

The following steps shall be initiated;

1. FOR USE WHEN MAJOR REPAIRS OR OUTAGE WORK IS ONGOING (>15 Contractors).  
Establish a location at or outside the plant gate to measure the contractor or non-Calpine visitor's temperature on the person's temple. Each plant shall have flexibility in the configuration of its testing area and shall at all times implement all hygienic procedures and precautions necessary to keep the contractors, visitors and the person taking the measurements healthy and safe.
2. FOR USE WHEN MINOR REPAIRS OR MAINTENANCE WORK IS ONGOING (<15 Contractors).  
Establish a location at the muster point of the plant to measure the contractor or visitor's temperature on the person's temple. The muster area must not be in the admin building. Each plant shall have flexibility in the configuration of its testing area and shall at all times implement all hygienic procedures and precautions necessary to keep the contractors, visitors and the

person taking the measurements healthy and safe.

3. For the purpose of the Geysers, the contractor screening shall take place at the GAC, WAC, WFO, the U14 gate, or other morning muster locations as required. For work within a plant, the expectations of Item 1 and 2 above apply.
4. Calpine visitors may be screened at the gate or perform self-checks as prescribed for all Calpine employees. If specific stations are set up by a plant its staff, the Calpine visitor shall follow the same protocols as the plant team unless a gate screening was performed.
5. For exceptions or deviations from Items 1 and 2, please contact the RVP.
6. All of the items below apply in all cases;
  - a. Follow the measuring instructions and the distance requirements defined by the thermometer OEM.
  - b. The measurement should be taken by a trained individual. It does not have to be someone medically trained, just someone trained on the use of the device. This could be a Security Guard or plant staff member assigned by plant leadership.
  - c. No readings should be written down.
  - d. Anyone with a temperature that measures at or above 100.4°F should be requested to step aside while the line is cleared. Please treat the individual with dignity and respect. Remember you are taking skin temperature so ambient air temperature or other forms of exertion on the body can raise or lower the individuals skin temperature. In lieu of measuring the actual temperature to protect individuals, an alternative may be to set an alarm point at 100.4°F.
  - e. For any person measured at 100.4°F or greater, please repeat the test after the line is cleared and at least 5 minutes have elapsed since the first temperature reading was taken. If the person is still shown to have a fever, please ask the individual to remain outside the gate, contact the individual's supervisor or manager and the plant manager or designee. Please honor all social distancing requirements. The Plant Manager or their designee should meet with the contractor's manager or supervisor and explain why the individual cannot report to work or visit the plant. The PM or designee should review the return to work policy of the contractor and seek guidance from the RVP and HRBP.
  - f. If a person refuses to have their temperature measured, please ask the individual to step aside and have his/her manager or supervisor come to the gate. Contractors and visitors who do not have their temperatures taken cannot enter the plant or if in the plant, shall be asked to leave the premises.
  - g. The person taking the contractor and visitor's temperatures shall wear a mask and gloves being sure not to touch their face. The person shall decontaminate himself and the area of the measurement location using appropriate wipes or sprays. In addition, the person taking the measurements should wear a face mask or other PPE as required.

### **Other Considerations**

1. Prior to a contractor mobilizing, or during the negotiation phase when possible, each plant shall notify their contractors and service providers to discuss the temperature monitoring requirements. If the contractor representative has any concerns, please contact your RVP and follow up discussion with legal and HR will be contacted.
2. For outages where Calpine Outage Services and/or Calpine Engineering will have contractors on site, please ensure the respective Calpine point of contact has reached out to their counterparties "prior" to coming on to site to notify of them of the temperature screening requirement (as required).
3. For larger outages, stagger the start times of your contracted work force so as not to cause a line at the gate while continuing to practice social distancing by all workers.

**ATTACHMENT 16; Temperature Screening for Contractors / Visitor in San Diego County**

**SAN DIEGO COUNTY ONLY**  
**TEMPERATURE SCREENING FOR CONTRACTORS/VISITORS**  
**GUIDELINES**  
**JANUARY 2021**  
**FINAL R0**

**Objective:** The document is intended to provide guidance to screen all contractors and visitors entering the Security gate at all Calpine Generating Facilities.

**Application:** The temperature screening applies to all contractors and visitors to the Calpine Property. Note that all Calpine employees (plant and non-plant) may be excluded from gate screenings but shall be required to complete a temperature measurement prior to starting work. If gate screenings are established, Calpine visitors may elect to go through the screening process. Please note, the Calpine employee visitor may also request a forehead thermometer to allow the employee to self-monitor their temperature..

**Recommended Use**

There are a number of different temperature measurement devices currently in use across the fleet. Regardless of the type of device, it is the expectation that the individual executing the measurement know the details of how the device functions and its proper use.

Where self-check stations are established for employees and Calpine visitors, please be sure to include a set of instructions at the self-check station.

Generally, the non-contact thermometers should be used 1.5-2.5 inches from the temple of the person being tested. If equipped with a laser, the laser should be turned off. The measurement should take 1 – 2 seconds.

**Contractor and Visitor Temperature Measurements:**

The following steps shall be initiated;

1. FOR USE WHEN MAJOR REPAIRS OR OUTAGE WORK IS ONGOING (>15 Contractors).  
Establish a location at or outside the plant gate to measure the contractor or non-Calpine visitor's temperature on the person's temple. Each plant shall have flexibility in the configuration of its testing area and shall at all times implement all hygienic procedures and precautions necessary to keep the contractors, visitors and the person taking the measurements healthy and safe.

2. FOR USE WHEN MINOR REPAIRS OR MAINTENANCE WORK IS ONGOING (<15 Contractors). Establish a location at the muster point of the plant to measure the contractor or visitor's temperature on the person's temple. The muster area must not be in the admin building. Each plant shall have flexibility in the configuration of its testing area and shall at all times implement all hygienic procedures and precautions necessary to keep the contractors, visitors and the person taking the measurements healthy and safe.
3. For exceptions or deviations from Items 1 and 2, please contact the RVP.
4. Calpine visitors may be screened at the gate or perform self-checks as prescribed for all Calpine employees. If specific stations are set up by a plant its staff, the Calpine visitor shall follow the same protocols as the plant team unless a gate screening was performed.
5. All of the items below apply in all cases;
  - a. Follow the measuring instructions and the distance requirements defined by the thermometer OEM.
  - b. The measurement should be taken by a trained individual. It does not have to be someone medically trained, just someone trained on the use of the device. This could be a Security Guard or plant staff member assigned by plant leadership.
  - c. No readings should be written down.
  - d. Anyone with a temperature that measures at or above 100.0°F should be requested to step aside while the line is cleared. Please treat the individual with dignity and respect. Remember you are taking skin temperature so ambient air temperature or other forms of exertion on the body can raise or lower the individuals skin temperature. In lieu of measuring the actual temperature to protect individuals, an alternative may be to set an alarm point at 100.0°F.
  - e. For any person measured at 100.0°F or greater, please repeat the test after the line is cleared and at least 5 minutes have elapsed since the first temperature reading was taken. If the person is still shown to have a fever, please ask the individual to remain outside the gate, contact the individual's supervisor or manager and the plant manager or designee. Please honor all social distancing requirements. The Plant Manager or their designee should meet with the contractor's manager or supervisor and explain why the individual cannot report to work or visit the plant. The PM or designee should review the return to work policy of the contractor and seek guidance from the RVP and HRBP.
  - f. If a person refuses to have their temperature measured, please ask the individual to step aside and have his/her manager or supervisor come to the gate. Contractors and visitors who do not have their temperatures taken cannot enter the plant or if in the plant, shall be asked to leave the premises.
  - g. The person taking the contractor and visitor's temperatures shall wear a mask and gloves being sure not to touch their face. The person shall decontaminate himself and the area of

the measurement location using appropriate wipes or sprays. In addition, the person taking the measurements should wear a face mask or other PPE as required.

#### **Other Considerations**

4. Prior to a contractor mobilizing, or during the negotiation phase when possible, each plant shall notify their contractors and service providers to discuss the temperature monitoring requirements. If the contractor representative has any concerns, please contact your RVP and follow up discussion with legal and HR will be conducted.
5. For outages where Calpine Outage Services and/or Calpine Engineering will have contractors on site, please ensure the respective Calpine point of contact has reached out to their counterparties "prior" to coming on to site to notify of them of the temperature screening requirement (as required).
6. For larger outages, stagger the start times of your contracted work force so as not to cause a line at the gate while continuing to practice social distancing by all workers.



**ATTACHMENT 17; Questionnaire: COVID-19 Reporting form for Management Receiving  
Notification from a Contract Employee**



**Power Plant Operations Contractor Event**

*COVID-19 Reporting Form for Management Receiving Notification by On-Site Contractor*

<b>Notification Details</b>		
Date and time of notification:		
Contractor Notification (Contract Employee Info):	Contractor	
	Name:	
	Job Title	
Job Function:		
Date(s) Contract Employee Was on Site:		
Work Location / Unit / Grade Elev (HRSG or Rack):		
Contractor POC:	Name:	
	Job Title:	
	Phone No.	
	Email:	
Calpine Employee Taking Report:	Name	
	Job Title	
	Phone No.	
<b>Actions / Questions for Contractor Interview (To be completed by the Calpine Manager)</b>		
<b>Question 1:</b>	<input type="checkbox"/> Provide summary of imminent contractor actions based on home office guidance including current employee location and path forward (i.e. What is the contractors protocol under these circumstances:	

<b>Question 2:</b>	<input type="checkbox"/> What specific locations has the contractor employee worked over the past 72 hours while on site:
<b>Question 3:</b>	<input type="checkbox"/> Has the contractor employee been using a mask during his/her time on site?
<b>Question 4:</b>	<input type="checkbox"/> Has the contractor employee worked within 6 feet for a cumulative total of 15 minutes or more over a 24-hour period starting from 2 days before illness onset (or, for asymptomatic patients, 2 days prior to test specimen collection) until the time the patient is isolated of any other contract employees? Include in the response all PPE that was in use.
<b>Question 5:</b>	<input type="checkbox"/> Where did the contractor employee take break and lunch?
<b>Question 6</b>	<input type="checkbox"/> If known, which porta-john or portable toilet did the contractor employee use? Please include specific locations near location of his /her work.

<b>Question 7</b>	<input type="checkbox"/> How did the contractor employee get to the work site? Were there any other individuals that rode to work in the same vehicle?
<b>Exposure type</b>	<b>Please complete the following to the best of your ability regarding any other information relative to the contract employee's condition. Please circle the appropriate response:</b>
<b>Type of exposure</b>	<div data-bbox="548 674 1463 766"> <input type="checkbox"/> Tested positive for the COVID 19 Virus  Yes / No / Unknown: </div> <div data-bbox="548 825 1463 989"> <input type="checkbox"/> Employee exhibiting symptoms consistent with COVID-19 or flu/influenza type symptoms (Such as fever, a cough, or shortness of breath)  Yes / No / Unknown: </div> <div data-bbox="548 1047 1463 1173"> <input type="checkbox"/> Contractor employee's family or household member tested positive for COVID-19 or exhibiting one or more symptoms described above  Yes / No / Unknown: </div> <div data-bbox="548 1253 1463 1417"> <input type="checkbox"/> Contractor employee has had contact with someone who tested positive for COVID-19 or exhibiting one or more symptoms described above (include as many details as possible below)  Yes / No / Unknown: </div> <div data-bbox="548 1497 1463 1623"> <input type="checkbox"/> A family member of someone contractor employee lives with has been in contact with a confirmed or suspected case of COVID-19  Yes / No / Unknown: </div>

**Any other Comments /  
Relevant Information**  
**(Fact based only)**

**Corrective / Required Actions: Contractor Supervisor**

- ☐ Support the Calpine management team investigation and cooperate to develop as much information to keep the work areas safe.
- ☐ Conform all actions to the more restrictive requirements of the contractor's company / corporate policy or Calpine's protocols.
- ☐ Recognize and agree that the contractor employees cannot return to site until conditions have been met that are in compliance with Contractor's corporate / company protocols. Contractor shall submit in writing the requirement for Return to Work status based on their own corporate / company protocols and shall demonstrate alignment with CDC guidelines. (Once received, review the conditions submitted with your HRBP for alignment with Calpine's requirements.)
- ☐ Without sharing any detailed medical records on the individual, as information becomes available, please update any information that may be available and would affect the work status of other contractors on site.
- ☐ If other contractor employees were directly contacted by the individual, and if the contractor wants to keep the individuals working on site, an additional Power Plant Operations Contractor Form shall be completed and submitted to the PM for consideration. It will be treated as an independent event and based on the contractor employer's requirements and the Calpine requirements, a determination for site access will be performed.
- ☐ If there were direct contact of any Contractor employees or Calpine employees and the individual tests positive, please provide notification to the Plant Manager so proper follow up actions can be implemented as required.

**Corrective Actions / PM-GM or designated Manager**

*NOTE: The items below provide general minimum guidance for response in the event an action occurs at your facility. It is not possible to make the list all-inclusive for all actions that need to be implemented. Please use care and be conservative in your response.*

- ❑ Immediately notify plant leadership, RVP & HRBP to report the situation
- ❑ Communicate sufficient aspects of the event to the on-site power ops team so that the initial response can be implemented. Assign specific tasks to individuals as required. Use care not to violate the individual's rights. (i.e.: "We have a contractor that is showing signs of illness. The contractor has been taken off site and the following steps need to be implemented.")
- ❑ Determine where the individual has been working since his/her exposure for the last 3 days if he/she is showing symptoms. Stop all work in those areas and barricade with tape.
- ❑ Sanitize all work areas that the contractor could have been in contact with since the exposure or over the past 3 days if he/she is showing symptoms. (use professional services as required)
- ❑ Sanitize the area where the contractor ate lunch and took breaks. Close off areas until a cleaning of area can be performed.
- ❑ Continuously reinforce all protocols and hygiene standards with all Calpine employees and other contractors on site.
- ❑ Apply any other prudent steps based on conditions and industry guidance.
- ❑ Send e-Mail communication to all employees working at the same plant (Plant Manager shall work with HRBP to develop communication. Content may vary based on actual conditions and care must be used when sharing information)
- ❑ Working with the HRBP and Legal as required, make notice to the Contractor supervisor (point of contact) on site at the time of the event. The content and message will vary with each situation.

Notes / Requested/required follow-up action(s) / or other relevant actions:

Report prepared by:		Signature: e:	
---------------------	--	------------------	--

Please submit a copy of this completed form to your HRBP

## **ATTACHMENT 18; Buying Groceries On-line**



## **BUYING GROCERIES ON LINE – WHOLE FOODS**

You may purchase groceries (Whole Foods) via Calpine's Amazon Business Prime Account. Those of you who already have an account can place grocery orders to secure provisions for your site.

To get to the Whole Foods page, you can type in Whole Foods in the 'search' bar.

When you check out, under the Shipping Address, please Edit the Delivery Instructions and in the Delivery Instructions box, add **Calpine Corp. for Essential Critical Infrastructure Workforce**.

For those who do not have an account yet, please notify me so I can add your name to Calpine's Amazon Business Prime account. You will then receive a notification to sign up.

If you have any questions or concerns, please let [Ziba](#) know.

When signing in to [www.amazon.com](http://www.amazon.com), please ensure Calpine's Amazon account is being populated:



## **BUYING GROCERIES ON LINE – SYSCO**

Each plant will receive an Account /User ID information on a separate email.

Please access <https://www.esysco.net> and register your plant. The default password is [REDACTED]. You are prompted to change the password upon login.

The screenshot shows the Sysco MySysco Order website. The header includes the Sysco logo and 'ORDER' text. The main content area is divided into several sections: a 'Login' section on the left with fields for 'Customer User ID' (containing 'esysco123') and 'Password', and buttons for 'Log In' and 'Forgot Password?'; a 'MySysco Order - Our Premier Ordering Application' section with a video and text about the app; a 'Become a Customer' section with a photo of a Sysco employee and text about Sysco's services; and a 'System Requirements' section at the bottom. The footer contains copyright information for 2010-2011 Sysco Corporation and links to Privacy Policy, Terms of Use, Contact, and Locations.

***You may or may not receive the following message about cookie policy when accessing esysco.net. I have double checked with Annessa, and it is OK to click "Accept."***



You can create an internal Blanket Purchase Order using Sysco's VID [REDACTED]. The PO number and mailstop can be entered when creating an order.

Example: TM020-200000XXXX-TMG

## **ATTACHMENT 19; Guidance for Plant Deliveries**

**CHEMICALS AND OTHER DELIVERIES  
GUIDELINES  
JANUARY 2021  
FINAL R0**

**Objective:** This document is intended to provide guidance on methods Calpine sites may use to limit exposure of employees to COVID-19 during the delivery of materials, chemicals, and equipment to the sites. This guidance is not intended to replace existing Standards, but to provide sites with options to evaluate and implement where it makes sense to do so.

**Application:** The temperature screening applies to all contractors and visitors to the Calpine Property. Note that all Calpine employees (plant and non-plant) may be excluded from gate screenings but shall be required to complete a temperature measurement prior to starting work. If gate screenings are established, Calpine visitors may elect to go through the screening process. Please note, the Calpine employee visitor may also request a forehead thermometer to allow the employee to self-monitor their temperatures.

**General Guidance**

1. Delivery personnel that enter the facility must complete the screening checklist and temperature check list prior to entering the plant.
2. Delivery personnel should not enter the administration building. Masks shall be worn at all times.
3. Contact with delivery personnel should be made in an outdoor environment whenever possible.
4. Contact with delivery personnel should occur while maintaining a minimum of 6-foot separation. The driver can set the bill of lading or receipt notifications down and the Calpine personnel can review and sign and repeat the process. :
  - i.
5. At all times, and especially during interaction with any delivery personnel, avoid touching your eyes, nose and mouth.
6. After any interaction, wash your hands with soap and water for at least 20 seconds. If soap and water is not readily available use an alcohol – based hand sanitizer with at least 60% alcohol.
7. Be polite yet firm in implementing the procedures your site adopts. Remind delivery personnel this is being done for their safety as well as ours.
8. Consider keeping delivery documents in a remote location to avoid the possibility of introducing the virus into normally occupied areas.

**Signing for packages**

1. If the package needs to be signed for, the person signing the delivery documents should wear disposable nitrile gloves (or similar) as PPE. If possible, do not share writing utensils.
2. The person should remove and appropriately dispose of used gloves, PPE (if applicable) and cleaning materials as described above.
3. Personnel handling the package should wash their hands with soap and water or use alcohol-based hand sanitizer if soap and water are not readily available.

**Routine Daily Deliveries**

1. Sites should establish a location near the front gate of the plant where deliveries can be dropped off while being monitored from the Control Room or through the use of a guard when one is present. Consider using a Jobox or similar equipment as a drop-off location, to protect deliveries from weather. (some sites have set up tented areas)
2. Caution; Individuals picking up boxes shall check the weight and size of the package. Where and when needed, seek assistance to avoid physical injury.

**Large deliveries**

1. Confirm the material is intended for the site, was ordered by Calpine personnel or a contractor working on site, prior to accepting delivery.
2. For material being delivered to a site contractor currently working on site, contact the contractor.
3. For Calpine deliveries, escort the delivery personnel to the delivery location the delivery. If possible, establish a delivery in an open environment. Follow all protocols.
4. Ask that the delivery person remain in their vehicle unless absolutely necessary. All drivers shall wear masks and any other appropriate PPE based on the material being delivered.

**Bulk Chemical Deliveries**

1. Follow all Standard Operating Procedures and enhance with the appropriate Pandemic protocols.
2. Upon notification a delivery is at the gate, the CRO should follow all Standard operating protocols for chemical deliveries with enhancements, where required for the Pandemic protocols.
3. Depending on the chemicals, confirm the driver is wearing the appropriate PPE. If supplemental PPE is not required, the driver, at a minimum, shall wear a mask. :
  - a.
4. Remember your protocols.

- a. Unless supplemental respiratory PPE is required, wear masks, follow social distance requirements
  - b. Protect your hands
- 5. Upon completion of the delivery:
  - a. Once complete, the area shall be cleaned/disinfected to include any object or equipment touched by the delivery personnel.
  - b. Wash your hands with soap and water or use alcohol-based hand sanitizer if soap and water are not readily available.

## Appendix

### Glove Removal Guidance from the CDC

# How to Remove Gloves

To protect yourself, use the following steps to take off gloves



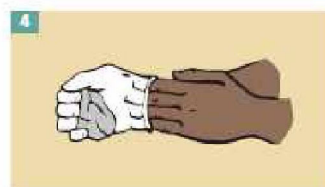
Grasp the outside of one glove at the wrist.  
Do not touch your bare skin.



Peel the glove away from your body,  
pulling it inside out.



Hold the glove you just removed in  
your gloved hand.



Peel off the second glove by putting your fingers  
inside the glove at the top of your wrist.



Turn the second glove inside out while pulling  
it away from your body, leaving the first glove  
inside the second.



Dispose of the gloves safely. Do not reuse the gloves.



Clean your hands immediately after removing gloves.



**ATTACHMENT 20; Return to Work (RTW) or Non-Essential Employees**

**PLANT EMPLOYEE  
RETURN TO WORK  
ORIENTATION AND MORE  
JANUARY 2021  
FINAL 0**

**Objective:** This document is intended to provide guidance to all employees that have been working from home upon their Return to Work at the worksite.

**Application:** Employees that have had extended periods working at home shall review this document upon their return to the worksite. Based on the individual's job responsibilities, review of this document does not relieve the obligation to familiarize themselves with the applicable sections of the Pandemic Guidance Document.

**RECEIVABLES**

**Upon their return, please make sure all individuals have the following items;**

1. Masks will be provided
2. Cleaning Supplies
3. Temperature Measuring devices

**GUIDANCE**

18. Your safety and the safety of your teams are of utmost importance. Please take the necessary steps to stay focused and take the time necessary to work safely.
19. Stay safe. The most effective method of protection from infected/exposed individuals remains social distancing and frequently washing your hands. The best information available is that COVID-19 enters the human body through the face (eyes, nose, and mouth). Infection most commonly occurs by touching your hands to exposed surfaces and then touching your hands to your face, which is why the recommendation is to frequently wash your hands, and through the air (from respiratory or speech droplets) , which is what makes social distancing so critical.
20. At the start of each shift, in a private location, each employee is requested to check their temperature. If your temperature is at or above 100.4°F or 38°C (following the thermometer instructions when taking the measurement), please continue to practice social distancing and immediately contact your manager or the first available manager at your facility. (For Otay Mesa, the limitation is 100.0°F.)
21. As required, each employee is requested to honor their community's shelter in place requirements, social restrictions, curfews, travel restrictions, or any other control measures put in position. . . By minimizing exposures and refraining from community interaction, the chances of being exposed are

mitigated. If you do need to go out or interact with contracted maintenance staff, please take all necessary precautions that includes social distancing, washing your hands frequently, avoid contact with surfaces or other elements that increase exposure, and adhere to all community guidance for face masks (if applicable). If you do have to travel on PTO, shift breaks, or time off of work, please let your Manager know if you would have to answer yes to any of the following;

- e. Conducted personal travel in the past 14 days to a location outside your work or residence state or county that has jurisdictional travel restrictions or inside or outside the US?
  - f. Have you knowingly been in close contact (within 6 feet for 15 minutes or more over a 24 hour period) with someone who has tested positive for COVID-19?
  - g. Have you tested and been found positive for COVID-19 and not received clearance to return to work by your supervisor or HR Business Partner? Please maintain communication with your manager and/or your HRBP.
  - h. Are you currently experiencing influenza-like symptoms such as fever, cough, and shortness of breath?
22. Please use great care when you are away from work to wear a mask, wash your hands, and watch your distance to protect your health and the health of your family. As we do with many of our safety practices, carry them home to decrease the potential for risk. As our communities open up, please remain vigilant and keep yourselves safe.
23. Remember to clean your work station at the start of your shift, and the end of your shift, and during the day if others have been in contact with your work area.
24. Do not enter anyone else's office or conference rooms without the ability to maintain the social distancing requirements.
25. Please stay out of the control room without specific approval from the PM/GM.
26. When in common areas, be sure to wipe down before and after each use. (This includes vending machines, coffee pots, microwave ovens, stove tops, etc.)
27. Remember to clean your PPE at the start of each shift and as required during your shifts.
28. Employees are required to wear a mask inside all buildings (except when you are alone in your own office), whenever social distancing requirement cannot be met indoors or outdoors, or as directed by local, state, or federal jurisdictional requirements. . This includes during the execution of daily routines at the plant when in the presence of others (Calpine and non-Calpine personnel). Even if social distancing criteria of 6 feet or greater can be achieved, it is strongly recommended that each employee wear their mask to maximize their protection.
29. For your added protection, N95 masks are available for your use and are available for times when 6 foot social distancing requirements cannot be achieved. A supply of N95 masks is available at each facility so if elected for use, please maintain your mask appropriately.

***Caution: The use of masks is not a substitute for washing your hands and the continuation of social distancing. In addition, care must be taken when wearing masks. If the mask requires constant adjustment or repositioning on your face, extreme care should be used when touching your hands to your face.***

30. Other Pre-cautions when wearing masks;

- l. A non-cloth face mask may be reused as long as it maintains its structural integrity and the filter material is not damaged, or contaminated with any substance. Please use great care after daily use, to dry masks and preserve them using hair dryers, some other hot air blowers, or other means of sterilization based on the type of mask and store in a plastic bag until the next time you are required to wear the mask.
  - m. If you are wearing cloth masks, please keep the masks clean so as not to exposure yourself to other contaminants. Wash and clean the cloth masks as required.
  - n. Please follow all proper protocols for donning and removing your mask using care not to cause an exposure. Wash your hands before and after the process.
  - o. Raise awareness and keep your PPE sterile and clean. Wash your safety glasses with hot water and soap for 20 seconds like your hands, especially after social distancing is not able to be maintained.
  - p. Use care and raise awareness not to lay your mask on common surfaces.
-

## **ATTACHMENT 21: State / County / Local Jurisdictional Links**

# Calpine

## List of Location Health Departments For COVID-19 Reporting

December 21, 2020

1. Alabama

<https://www.alabamapublichealth.gov/index.html>

<https://www.alabamapublichealth.gov/morgan/> (Morgan Co.)

2. Arizona

<https://www.azdhs.gov/>

<https://www.mohavecounty.us/ContentPage.aspx?id=127> (Mohave Co.)

<https://www.navajo-nsn.gov/> (Navajo Reservation)

3. Arkansas

<https://healthy.arkansas.gov/>

<https://www.healthy.arkansas.gov/health-units/detail/jefferson-county-health-unit-pine-bluff> (Jefferson)

4. California

<https://www.cdph.ca.gov/>

<https://acphd.org/> (Alameda Co.)

<https://cchealth.org/public-health/> (Contra Costa Co.)

<https://kernpublichealth.com/> (Kern Co.)

<http://health.co.lake.ca.us/> (Lake Co.)

<https://www.co.monterey.ca.us/government/departments-a-h/health>  
(Monterey Co.)

<https://dhs.saccounty.net/PUB/Pages/PUB-Home.aspx> (Sacramento Co.)

<https://www.sandiegocounty.gov/hhsa/programs/phs/> (San Diego Co.)

<https://www.sccgov.org/sites/phd/Pages/phd.aspx> (Santa Clara Co.)

<https://www.solanocounty.com/depts/ph/default.asp> (Solano Co.)

[https://www.suttercounty.org/doc/government/depts/hs/ph/hs\\_public\\_health](https://www.suttercounty.org/doc/government/depts/hs/ph/hs_public_health)

(Sutter)

5. Delaware

<https://www.dhss.delaware.gov/dhss/dph/index.html>

<https://www.dhss.delaware.gov/dhss/dph/index.html> (New Castle)

6. Dist. of Columbia

<https://dchealth.dc.gov/>

7. Illinois

<https://www.dph.illinois.gov/>

<https://www.dupagehealth.org//> (DuPage Co.)

<https://www.lakecountyil.gov/148/Health-Department-Community-Health-Cente>  
(Lake Co.).

8. Louisiana

<https://ldh.la.gov/>

<https://ldh.la.gov/index.cfm/directory/detail/4838/catid/232> (Washington Parish)

9. Maine

<https://www.maine.gov/dhhs/>

<https://www.maine.gov/dhhs/mecdc/public-health-systems/lphd/district2/council-main.shtml> (Cumberland Co)

10. Maryland

<https://health.maryland.gov/pages/home.aspx>

<https://somersethealth.org/> (Somerset Co)

11. Massachusetts

<https://www.mass.gov/orgs/departments-of-public-health>

<http://www.virtualnorfolk.org/boards-committees/board-of-health/> (Norfolk Co.)

12. Michigan

<http://www.virtualnorfolk.org/boards-committees/board-of-health/>

<https://www.oakgov.com/health/information/covid-19/Pages/default.aspx>  
Oakland Co

13. New Hampshire

<https://www.dhhs.nh.gov/>

<https://www.rockinghamcountypublichealth.org/> (Rockingham Co.)

14. New Jersey

<https://www.nj.gov/health/>

<http://www.middlesexcountynj.gov/Government/Departments/PSH/Pages/default.aspx>  
(Middlesex Co.)

<http://www.co.cumberland.nj.us/ccdoh>  
(Cumberland Co.)

15. New York

<https://health.ny.gov/>

<https://www.nassaucountyny.gov/1652/Health-Department> (Nassau Co.)

<https://www.suffolkcountyny.gov/health> (Suffolk Co.)



<https://www1.nyc.gov/site/doh/index.page> (Queens)

16. Oregon

<https://www.oregon.gov/oha/ph/pages/index.aspx>

<http://www.co.umatilla.or.us/health/> (Umatilla)

17. Pennsylvania

<https://www.health.pa.gov/Pages/default.aspx>

<https://www.health.pa.gov/topics/programs/WalkWorks/Pages/Northampton-County.aspx> (Northampton Co.)

<https://www.health.pa.gov/topics/programs/WalkWorks/Pages/York-County.aspx>  
(York Co.)

18. Texas

<https://dshs.state.tx.us/>

<https://www.dshs.state.tx.us/region7/default.shtm> (Bosque Co.)

<https://www.co.chambers.tx.us/page/health.department> (Chambers Co.)

<https://www.fbchhs.org/> (Fort Bend Co.)

<http://www.co.freestone.tx.us/> (Freestone Co.)

<https://www.gchd.org/about-us/news-and-events/2019-novel-coronavirus-2019-ncov>  
(Galveston Co.)

<https://dshs.state.tx.us/region8/cty14.shtm> (Guadeloupe County)

<https://publichealth.harriscountytexas.gov/> (Harris Co.)

<https://www.hidalgocounty.us/1032/Health-and-Human-Services> (Hidalgo Co.)

<https://www.cctexas.com/health> (Nueces Co.)

19. Virginia

<https://www.vdh.virginia.gov/>

<https://www.co.accomack.va.us/departments/human-resources/employee-resources/health-wellness/coronavirus-disease-covid-19> (Accomack Co.)

[https://www.co.northampton.va.us/residents/healthy\\_northampton/coronavirus\\_covid-19](https://www.co.northampton.va.us/residents/healthy_northampton/coronavirus_covid-19) (Northampton Co.)

**ATTACHMENT 22; OSHA Discretion Enforcement / Good Faith Efforts**

Enforcement Memos

/ Discretion in Enforcement when Considering an Employer's Good Faith Efforts During the Coronavirus Disease 2019 (COVID-19) Pandemic

April 16, 2020

**MEMORANDUM FOR:**

REGIONAL ADMINISTRATORS  
STATE PLAN DESIGNEES

**THROUGH:**

AMANDA EDENS  
Deputy Assistant Secretary

**FROM:**

PATRICK J. KAPUST, Acting Director  
Directorate of Enforcement Programs

SCOTT KETCHAM, Director  
Directorate of Construction

**SUBJECT:**

Discretion in Enforcement when Considering an Employer's Good Faith Efforts During the Coronavirus Disease 2019 (COVID-19) Pandemic

In light of the coronavirus disease 2019 (COVID-19) pandemic, OSHA understands that some employers may face difficulties complying with OSHA standards due to the ongoing health emergency. Widespread business closures, restrictions on travel, limitations on group sizes, facility visitor prohibitions, and stay-at-home or shelter-in-place requirements may limit the availability of employees, consultants, or contractors who normally provide training, auditing, equipment inspections, testing, and other essential safety and industrial hygiene services. Business closures and other restrictions and limitations may also preclude employee participation in training even when trainers are available. In other situations, access to medical testing facilities may be limited or suspended.

For example, the American College of Occupational and Environmental Medicine issued a recommendation that occupational spirometry testing be suspended because of concerns about spreading droplets containing the COVID-19 virus during spirometry maneuvers. In addition, the Council for Accreditation in Occupational Hearing Conservation issued a recommendation that audiometric evaluations be suspended until normal operations have resumed, in order to minimize the risk to healthcare workers and conserve personal protective equipment.

During the course of an inspection, OSHA Area Offices will assess an employer's efforts to comply with standards that require annual or recurring audits, reviews, training, or assessments (see Annex below for some examples). Compliance Safety and Health Officers (CSHOs) should evaluate whether the employer made good faith efforts to comply with applicable OSHA standards and, in situations where compliance

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<https://www.osha.gov/memos/2020-04-16/discretion-enforcement-when-considering-emplo...> 6/2/2020

was not possible, to ensure that employees were not exposed to hazards from tasks, processes, or equipment for which they were not prepared or trained. As part of assessing whether an employer engaged in good faith compliance efforts, CSHOs should evaluate whether the employer thoroughly explored all options to comply with the applicable standard(s) (e.g., the use of virtual training or remote communication strategies). CSHOs should also consider any interim alternative protections implemented or provided to protect employees, such as engineering or administrative controls, and whether the employer took steps to reschedule the required annual activity as soon as possible.

In instances where an employer is unable to comply with OSHA-mandated training, audit, assessment, inspection, or testing requirements because local authorities required the workplace to close, the employer should demonstrate a good faith attempt to meet the applicable requirements as soon as possible following the re-opening of the workplace.

Where the employer cannot demonstrate any efforts to comply, a citation may be issued as appropriate under existing enforcement policy. However, where an employer has made attempts to comply in good faith, Area Offices shall take such efforts into strong consideration in determining whether to cite a violation. Where enforcement discretion is warranted, Area Offices will ensure that sufficient documentation (e.g., notes on the efforts the employer made to comply, letters or other documentation showing that providers had closed) is provided in the case file to support the decision.

In order to ensure that corrective actions have been taken once normal activities resume, OSHA will develop a program to conduct monitoring inspections from a randomized sampling of cases where violations were noted but not cited. To accommodate this, CSHOs shall enter the code N-10-ABATEMENT DEFERRED in the OSHA Information System to denote such cases. Additional guidance on monitoring will be provided at a later date.

This memorandum will take effect immediately and remain in effect until further notice. This guidance is intended to be time-limited to the current public health crisis. Please frequently check OSHA's webpage at [www.osha.gov/coronavirus](http://www.osha.gov/coronavirus) for updates.

cc: DCSP  
DTSEM  
DSG

[Correction 4/22/2020]

#### **Annex**

##### ***Examples of Situations Where Enforcement Discretion Should be Considered***

*(Note: Some standards referenced may be applicable to multiple industries.)*

##### ***Annual Audiograms***

An employer contracts with a service that provides a mobile audiometric testing facility. The service was scheduled to arrive at the employer's facility on March 27, 2020, but due to on-site visitor restrictions and social distancing protocols, the employer cancelled the arrival of the mobile facility. OSHA will not cite the employer for failing to conduct annual audiograms, provided the employer considered alternative options for compliance, implemented interim alternative protective measures, where possible, and shows a good faith effort to reschedule the mobile facility as soon as possible.

***[Annual] Process Safety Management Requirements (Process Hazard Analysis (PHA) Revalidation, Review of Operating Procedures, and Refresher Training)***

<https://www.osha.gov/memos/2020-04-16/discretion-enforcement-when-considering-emplo...> 6/2/2020

An employer contracts with a consultant to conduct process hazard analysis (PHA) revalidations. A PHA revalidation for the employer's ammonia refrigeration process was due to be completed by April 1, 2020, but because of travel restrictions and shelter-in-place orders, the consultant was unable to fly to the employer's location. OSHA will not cite the employer for failing to meet the [three-year five-year] requirement for conducting a PHA revalidation, provided the employer considered alternative options for compliance, implemented interim alternative protective measures, where possible, and shows a good faith effort to reschedule the PHA revalidation as soon as the travel restrictions and shelter-in-place orders are lifted.

#### ***Hazardous Waste Operations Training***

An employer operating a site where there is potential for the release of hazardous materials uses a contractor for emergency response and containment. That same contractor also conducts training for all employees working on site that may be exposed to hazardous substances during a release. The annual training was scheduled to take place at the end of March 2020, but was cancelled due to the plant shutdown following state and local mandates. OSHA will not cite the employer for failing to conduct the annual refresher training, provided the employer shows a good faith effort to reschedule the training as soon as the shutdown has been lifted.

#### ***Respirator Fit Testing and Training***

As part of an employer's manufacturing operations, employees use spray booths to apply a finishing coat to products, requiring the use of respirators. The employer scheduled annual refresher training for April 1, 2020, but the consultant was unable to conduct the training because of travel restrictions. OSHA will not cite the employer for failing to conduct the annual refresher training, provided that the employer considered alternative options for compliance; implemented interim alternative protective measures, where possible; and shows a good faith effort to reschedule the training as soon as the restrictions are lifted. (For more information refer to OSHA's April 3, 2020 memorandum, Enforcement Guidance for Respiratory Protection and the N95 Shortage Due to the Coronavirus Disease 2019 (COVID-19) Pandemic. For specific guidance related to healthcare workers, see OSHA's March 14, 2020 memorandum, Temporary Enforcement Guidance - Healthcare Respiratory Protection Annual Fit-Testing for N95 Filtering Facepieces During the COVID-19 Outbreak.)

#### ***Maritime Crane Testing and Certification***

An employer contacts an OSHA Accredited Cargo Gear Company to have the employer's cargo gear inspected and certified because its OSHA 71 certificate is about to expire. The inspection is scheduled to take place at the employer's facility, but due to travel restrictions, on-site visitor constraints, and social distancing protocols, the inspection cannot take place. OSHA will not cite the employer for not having current cargo gear accreditation certificates (OSHA 71s), provided the employer considered alternative options for compliance, implemented interim alternative protective measures, where possible, and shows a good faith effort to reschedule the cargo gear inspection as soon as possible.

#### ***Construction Crane Operator Certification***

An operator certified in accordance with 29 CFR 1926 Subpart CC (Cranes and Derricks) is unable to undergo a re-certification or re-licensing examination due to travel restrictions or social distancing protocols. OSHA will not cite the operator's employer for allowing the operator to work with an expired certification as long as the employer considered alternative options for compliance, implemented interim

alternative protective measures, where possible, and can show good faith in its effort to reschedule and complete the operator's recertification as soon as possible through a certification or licensing body that meets the requirements of OSHA's standard.

**Medical Evaluation**

Along with engineering controls, an employer operating a plywood manufacturing facility provides employees with respirators to prevent exposure to formaldehyde. In order to conduct a medical evaluation to determine if employees are cleared to wear respirators, the employer contracts with medical professionals to conduct pulmonary function testing, or spirometry. However, because of the American College of Occupational and Environmental Medicine's recommendation, such testing is suspended. OSHA will not cite the employer for failing to conduct the periodic [medical] monitoring if the employer implemented interim alternative protective measures, where possible, and shows a good faith effort to reschedule the spirometry testing once the suspension is lifted.

UNITED STATES  
DEPARTMENT OF LABOR

Occupational Safety & Health Administration  
200 Constitution Ave NW  
Washington, DC 20210  
800-321-6742 (OSHA)  
TTY  
[www.OSHA.gov](http://www.OSHA.gov)

**FEDERAL GOVERNMENT**

White House  
Severe Storm and Flood Recovery  
Assistance  
Disaster Recovery Assistance  
[DisasterAssistance.gov](http://DisasterAssistance.gov)  
[USA.gov](http://USA.gov)  
No Fear Act Data  
U.S. Office of Special Counsel

**OCCUPATIONAL  
SAFETY & HEALTH**

Frequently Asked  
Questions  
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**ATTACHMENT 23; OSHA Updated Enforcement Response Plan (May 19, 2020)**



# U.S. Department of Labor Adopts Revised Enforcement Policies For Coronavirus

United States Department of Labor sent this bulletin at 05/19/2020 04:49 PM EDT

News Release from OSHA

Having trouble viewing this email? [View it as a Web page.](#)



## News Release

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U.S. Department of Labor | May 19, 2020

### U.S. Department of Labor Adopts Revised Enforcement Policies For Coronavirus

**WASHINGTON, DC** – The U.S. Department of Labor's Occupational Safety and Health Administration (OSHA) has adopted revised policies for enforcing OSHA's requirements with respect to coronavirus as economies reopen in states throughout the country.

Throughout the course of the pandemic, understanding about the transmission and prevention of infection has improved. The government and the private sector have taken rapid and evolving measures to slow the virus's spread, protect employees, and adapt to new ways of doing business.

Now, as states begin reopening their economies, OSHA has issued two revised enforcement policies to ensure employers are taking action to protect their employees.

<https://content.govdelivery.com/accounts/USDOL/bulletins/28e71b5>

5/20/2020

First, OSHA is increasing in-person inspections at all types of workplaces. The new enforcement guidance reflects changing circumstances in which many non-critical businesses have begun to reopen in areas of lower community spread. The risk of transmission is lower in specific categories of workplaces, and personal protective equipment potentially needed for inspections is more widely available. OSHA staff will continue to prioritize COVID-19 inspections, and will utilize all enforcement tools as OSHA has historically done.

Second, OSHA is revising its previous enforcement policy for recording cases of coronavirus. Under OSHA's recordkeeping requirements, coronavirus is a recordable illness, and employers are responsible for recording cases of the coronavirus, if the case:

- Is confirmed as a coronavirus illness;
- Is work-related as defined by 29 CFR 1904.5; and
- Involves one or more of the general recording criteria in 29 CFR 1904.7, such as medical treatment beyond first aid or days away from work.

Under the new policy issued today, OSHA will enforce the recordkeeping requirements of 29 CFR 1904 for employee coronavirus illnesses for all employers. Given the nature of the disease and community spread, however, in many instances it remains difficult to determine whether a coronavirus illness is work-related, especially when an employee has experienced potential exposure both in and out of the workplace. OSHA's guidance emphasizes that employers must make reasonable efforts, based on the evidence available to the employer, to ascertain whether a particular case of coronavirus is work-related.

Recording a coronavirus illness does not mean that the employer has violated any OSHA standard. Following existing regulations, employers with 10 or fewer employees and certain employers in low hazard industries have no recording obligations; they need only report work-related coronavirus illnesses that result in a fatality or an employee's in-patient hospitalization, amputation, or loss of an eye.<sup>11</sup>

For further information and resources about the coronavirus disease, please visit OSHA's coronavirus webpage.

Under the Occupational Safety and Health Act of 1970, employers are responsible for providing safe and healthful workplaces for their employees. OSHA's role is to help ensure these conditions for America's working men and women by setting and enforcing standards, and providing training, education and assistance. For more information, visit [www.osha.gov](http://www.osha.gov).

The mission of the Department of Labor is to foster, promote and develop the welfare of the wage earners, job seekers and retirees of the United States; improve working conditions; advance opportunities for profitable employment; and assure work-related benefits and rights.

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[1] See 29 C.F.R. §§ 1904.1(a)(1), 1904.2.

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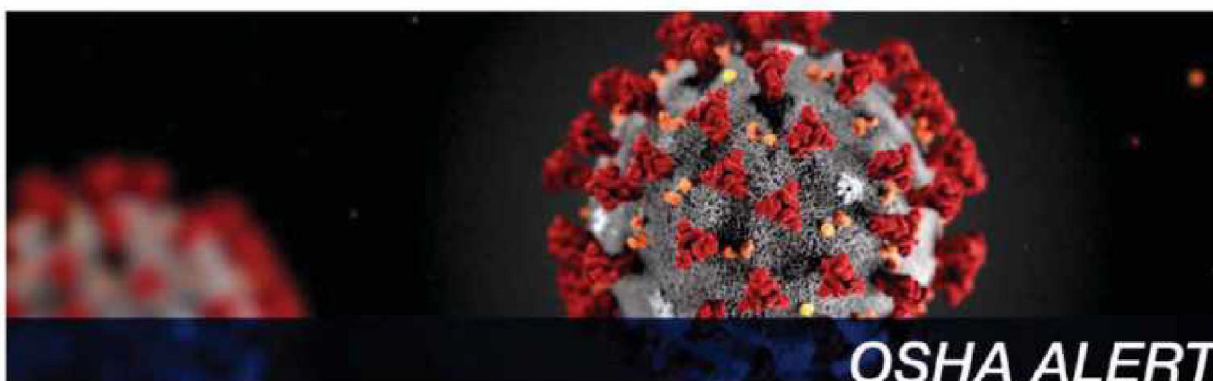
U.S. Department of Labor news materials are accessible at <https://www.dol.gov>. The Department's [Reasonable Accommodation Resource Center](#) converts departmental information and documents into alternative formats, which include Braille and large print. For alternative format requests, please contact the Department at (202) 693-7826 (voice) or (800) 877-8339 (federal relay).

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**ATTACHMENT 24; OSHA Alert – May 2020**



## COVID-19 Guidance on Social Distancing at Work

OSHA is committed to protecting the health and safety of America's workers and workplaces during these unprecedented times. The agency will be issuing a series of alerts designed to keep workers safe.


Social (physical) distancing involves maintaining at least six feet of distance between people and is an effective way to help reduce the risk of exposure to the coronavirus. The following steps can help employers implement social distancing in the workplace:

- Encourage workers to stay home if they are sick.
- Isolate any worker who begins to exhibit symptoms until they can either go home or leave to seek medical care.
- Establish flexible worksites (e.g., telecommuting) and flexible work hours (e.g., staggered shifts), if feasible.
- In workplaces where customers are present, mark six-foot distances with floor tape in areas where lines form, use drive-through windows or curbside pickup, and limit the number of customers allowed at one time.
- Stagger breaks and rearrange seating in common break areas to maintain physical distance between workers.
- Move or reposition workstations to create more distance, and install plexiglass partitions.
- Encourage workers to bring any safety and health concerns to the employers' attention.

For more information, visit [www.osha.gov/coronavirus](https://www.osha.gov/coronavirus) or call 1-800-321-OSHA (6742).

*OSHA issues alerts to draw attention to  
worker safety and health issues and solutions.*



• [osha.gov/coronavirus](https://www.osha.gov/coronavirus) • 1-800-321-OSHA (6742) • @OSHA\_DOL 

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