

AKOSH NARRATIVE REPORT

Friday, August 7, 2020
Copper River Seafoods
CSHO: Williamson, Dale

Inspection #:1487294

CSHO ID: E1584

HEALTH NARRATIVE

Copper River Seafoods
1400 E 1st Ave., Anchorage, AK 99501
907-522-7806

Inspection #: 1487294
Inspection Dates: 8/7/20
Closing Dates: 9/1/2020

Site Address: 1400 E 1st Ave., Anchorage, AK 99501

AKOSH Representatives:

<u>Name</u>	<u>Title/Position</u>
Dale Williamson	CSHO
Jim Pinder	CSHO
Jorge Gustavo Azpilcueta	CSHO

Management Officials:

<u>Name</u>	<u>Title/Position</u>
Chris LaCroix	Compliance Director
Terry Abarro	HR Director
Dan Dumlao	Chief Engineer

Union Officials:

<u>Name</u>	<u>Title/Position</u>
None	

History:

On 7/31/20 I, Dale Williamson, was assigned by the Chief of Enforcement, Ronald Larsen, to conduct an un-programmed inspection in response to a referral from the Department of Health and Social Services (DHSS). The referral from DHSS concerned a widespread outbreak of COVID-19 at Copper River Seafoods (CRS), as well as a lack of employee protections for workers from COVID-19. CSHO Pinder conducted a simultaneous safety inspection, which can be found in Inspection #1487336.

Copper River Seafoods is an Alaskan owned fish processing company with properties in Anchorage, Cordova, Kenai, Naknek, and Togiak.

Opening Conference:

On 8/7/20 CSHO Pinder and I arrived onsite at approximately 0945 hours and requested to speak with a member of management. After a brief period, we were brought inside the facility and met by Chris LaCroix. Mr. LaCroix requested that we undergo temperature screening, to which we agreed. He then escorted CSHO Pinder and me to his office for the opening conference. I began the opening conference at 1004 hrs. We introduced ourselves and presented our credentials. I explained the nature and purpose of the inspection as well as all of the items on the inspection checklist. Chris LaCroix granted me permission to proceed with the inspection. At the conclusion of the opening conference, Chris LaCroix discussed an email he had sent to Chief Financial Officer Rich Monroe on 8/2/20. In this email, Mr. LaCroix discusses 26 proposed action steps which CRS could use to reduce the

AKOSH NARRATIVE REPORT

Friday, August 7, 2020
Copper River Seafoods
CSHO: Williamson, Dale

Inspection #:1487294

CSHO ID: E1584

transmission of COVID-19 within its workforce. At this time, Mr. LaCroix stated he had sent an email to the same effect approximately three weeks earlier (placing that email at approximately July 17th). Mr. LaCroix stated that as of 8/7/20, he had not received any feedback from CRS management regarding any of the items from the email.

Walk-around:

At approximately 1013 hours the walk-around inspection started in the plant. Compliance Director Chris LaCroix, Production Supervisor Danilo Recinos, and Quality Control Officer Criselda Ting accompanied us. Chief Engineer Dan Dumlao was present intermittently. Two battery chargers were located in the loading bay next to an electric forklift which had the forks raised. After confirming that the electric forklift was charged in this location, Danilo Recinos indicated that the closest eyewash station was approximately 75 feet away through a door by the coolers. The path was obstructed. CRS had experienced an outbreak of COVID-19 in the month of July which affected 92 employees. When we observed the fish processing line, employees were observed to be working within 6 feet of each other. While employees were wearing face coverings, no physical barriers were in place. When asked about what discussions had taken place regarding additional precautions to protect employees from COVID-19 other than face coverings, Chris LaCroix stated that discussions had taken place and were ongoing, but CRS management had not determined what actions they were going to take.

Interviews were conducted with employees via telephone due to COVID-19 concerns. During each interview employee confidentiality and whistleblower rights were explained. Some interviews were conducted by CSHO Azpilcueta as the employees were only fluent in Spanish. Interviews were also conducted with the Department of Health and Social Services, the Municipality of Anchorage Health Department, and Capstone Family Medicine employees via telephone.

Document Review

CRS's COVID-19 Action Plan and Infectious Disease Program was requested from CRS. CRS authored their first version of the COVID-19 Mitigation Plan as required by the State of Alaska on March 27, 2020. CRS received initial approval from the State of Alaska on July 6, 2020. The State of Alaska Medical Plan Review Task Force conducted an additional medical and epidemiological review of the plan and issued two findings regarding the work protection plan in a letter dated 7/6/20, stating: "Integrating findings from the medical and epidemiological review will strengthen protective measures already enacted while improving processes for reporting, transporting, protecting the workforce, and testing and treating workers with COVID-19. Protective measures and procedures are critical to safeguarding your employees and the citizens of the communities in which you operate, both this season and in future years". The two findings identified were: "Need to address the use of PCR testing" and "What happens if a positive case happens". Version 8 was provided, which was authored on August 5, 2020. Section VIII b ii states: "Where practical and in consideration for food safety, line employees are kept 6 feet from each other and/or have barriers between them when working <6 feet from another employee. IMPORTANT: see exemption note in section IV.c.ii". Section IV.c.ii does not exist within Version 8 of the document. Revision 6 of the COVID Mitigation Plan was also provided, which was dated July 23, 2020 (which was the day after the extensive COVID-19 testing had concluded at the work site). Section IV.c.ii within that plan states:

AKOSH NARRATIVE REPORT

Friday, August 7, 2020
Copper River Seafoods
CSHO: Williamson, Dale

Inspection #:1487294

CSHO ID: E1584

SPECIAL EXEMPTION

Copper River Seafoods, Inc. is considered a Critical Infrastructure Company. All employees of the company and all contracted workers who have been employed by the company to conduct Critical Infrastructure work are considered exempt from federal, state and local restrictions such as social distancing. The company will make every attempt to put social distancing protocols into place, however, due to equipment, workspace and other constraints, this may not be feasible in many situations.

When asked about this exemption, CRS stated that it was contained within a previous version of State of Alaska Health Mandate 10, Appendix 01 (previously known as Attachment A). According to the Department of Health and Social Services, no such exemption was ever written by the State of Alaska. Review of all publications authored by Federal entities also failed to provide such an exemption.

Payroll records were reviewed to determine the total number of employees who worked between July 12th, 2020, and August 7th, 2020. These dates were selected to correspond with DHSS recording the first confirmed COVID positive CRS employee (7/17/20) and the date of the onsite inspection (8/7/20).

CRS stated that according to their understanding, the main symptom to look for in employees was fever, and this was where they concentrated their efforts regarding employee screening. However, the temperature logs showed severe deficiencies to include as many as 35 out of 135 employees whose temperature was not taken for their shift (7/19/20), temperatures which if accurate would reflect 99 employees experiencing moderate to severe hypothermia on at least one day they worked, as well as four employees experiencing a fever at the time their temperature was taken. Of these four, one employee was documented on July 18, 2020 as having a fever and a cough and was still allowed to work for eight hours on that day. During an interview, a member of CRS management stated: "Frankly, there was no one who seemed to be sick with anything more than a common cold. During one of our pre-season meetings, our General Manager from Naknek had commented that he wasn't a doctor and asked if we're supposed to send people to be tested every time that they had a sniffle. I did not get the directive to have people tested if they had a cold: we were told to have employees not come in if they were sick". When compared to the payroll records which were submitted by CRS, 54 additional employees were listed on the temperature logs with no corresponding payroll records. Of the employees who were listed on the temperature logs but had no corresponding payroll records, 11 were listed on the OSHA 300 Log for 2020 as having tested positive for COVID-19. Also, 18 employees worked without having their temperature taken for the entire time period between 7/12/20 and 8/7/20. CRS stated that the facility was closed for approximately two weeks to perform cleaning of the facility and high touch surfaces. The exact dates are difficult to determine due to inconsistent statements from CRS management as well as payroll and temperature log discrepancies.

The OSHA 300 logs were reviewed and found to be incomplete: two CRS employees whose names were not listed on the Log required hospitalization, and of these two employees, one ultimately suffered an amputation.

DHSS Records were also reviewed: When compared with CRS timesheets and OSHA 300 Logs, three employees were confirmed to be within their ten day minimum required quarantine period and working at the facility on the day of the walkaround inspection (8/7/20).

Using provided information (DHSS Records, CRS payroll and OSHA 300 Log), 68.7% of CRS's employees became infected with COVID-19 between July 17, 2020, and 7/29/20.

AKOSH NARRATIVE REPORT

Friday, August 7, 2020
Copper River Seafoods
CSHO: Williamson, Dale

Inspection #:1487294

CSHO ID: E1584

Closing Conference:

On 9/1/20 at approximately 1300 hours, a Closing Conference was held over the phone with myself, CSHO Pinder, Terry Abarro, Dan Dumlao, Leonard Wheeler, Criselda Ting, Marco Pasion, Robert Dyett, Chris LaCroix, and Hershey Lagaya in attendance. During the conference the 9 items on the closing conference worksheet were read aloud with an emphasis on employee Whistleblower protections and the 15 working day contest period. I explained and encouraged the use of consultation and training available through AKOSH. Copies of the closing conference, employer responsibilities, OSHA consultation fact sheet, request for consultation, workers compensation memo, the CDC Checklist for Seafood Processing Worksites, and safety websites were provided.

Evaluation of Health and Safety Program

Code:	0 = Nonexistent	1 = Inadequate	2 = Average	3 = Above Average
A. Written Program	X			
B. Communication to Employee		X		
C. Enforce Program		X		
D. Safety Program				
E. Health Program		X		
F. Injuries Investigated	X			
G. Preventative or Corrective Action	X			

Conclusions:

Based on the inspection findings and employee interviews the follow alleged violations were noted.

- Willful General Duty Clause: CRS made minimal efforts to protect their employees against COVID-19 both prior to and subsequent to experiencing a widespread outbreak at their facility. After returning to work from the outbreak, CRS made no changes to facility practices (social distancing) or configuration (the installation of physical barriers where social distancing was not possible).
- Respiratory Protection Program: No written program existed at the time of the inspection.
- Respiratory Protection: No medical evaluation or fit test for at least one employee, no employee training
- Eyewash: Battery chargers were being used on the loading dock with the closest eyewash station located through a door approximately 75' away with an obstructed path.
- HazCom: No employee training.
- Repeat Failure to report: CRS was aware of one employee who was hospitalized with COVID-19 and failed to make report within 8 hours. CRS had no knowledge of another employee who was still

Violation Worksheet

Print Date: January 5, 2021

		Inspection Number	1487294		
		Opt. Insp. Number			
Establishment Name	Copper River Seafoods, INC.				
DBA Name	Copper River Seafoods, INC.				
Type Of Violation	Willful-Serious	Citation Number	1	Item/Group	1
Standard	AS 18.60.075(a)(4)				
Alleged Violation Description	<p>AS 18 Health Safety and Housing</p> <p>60 Safety</p> <p>075 Safe Employment</p> <p>(a) An employer shall do everything necessary to protect the life, health, and safety of employees including, but not limited to</p> <p>(4): furnishing to each employee employment and a place of employment that are free from recognized hazards that, in the opinion of the commissioner, are causing or are likely to cause death or serious physical harm to the employees.</p> <p>EXAMPLE: Employees are exposed to health hazards including, but not limited to: death, permanent disability, lung damage, and temporary illness as a result of the employer's failure to protect employees from SARS-CoV-2 (Novel Coronavirus). In July 2020, 92 CRS employees were infected with Novel Coronavirus. After shutting the plant down and performing a thorough surface cleaning, CRS reopened the plant with no additional precautions taken: Employees continue to work within six feet of each other with no physical barriers in place or other additional measures taken to ensure that they did not spread the virus.</p>				
Recommended Abatement Action	Follow Federal, State, and local guidelines to protect employees against the spread of COVID-19 to include social distancing, disallowing employees who are showing symptoms to work, and install physical barriers where social distancing is not possible.				
# Instances	1	# Exposed	92		
Special Enforcement Type		Related Event Code (REC)	Referral		
General Duty Key Words	COVID-19	Employer's Relation to Hazard	All		

Photo/Video Number	2369, 2370, 2371, 5505-5518	Substance Codes	
---------------------------	-----------------------------	------------------------	--

Penalty

Severity			
Severity Justification			
Probability			
Probability Justification			
Gravity		Size	
Gravity based Penalty		Good Faith	
# Times Repeated		History	
Multiplier		Quick Fix	
Calculated Penalty		Proposed Penalty	
Proposed Penalty Justification			

Abatement Details

# Days to Abate	15 working days	Abatement Status	
Abatement Due Date		Date Abated	
Abatement Documentation Required?	Yes	Date Verified	
Abatement Completed Description			

Multi-Step Abatement

Type/Other Type	# Days to Abate	Abatement Due Date	Completed (Status)	Verify Date

Employee Exposure

Violation Instance	# Exposed to Instance	Employer	Name and Address Telephone Numbers	Duration	Frequency	Proximity
	45	Copper River Seafoods,		7 Day(s)	8 hrs/day	Within 6 feet

		INC.	[REDACTED]			
	5	Copper River Seafoods, INC.	[REDACTED]	4 Month(s)	8 hrs/day	Within 6 feet
	91	Copper River Seafoods, INC.	[REDACTED]	7 Day(s)	8 hrs/day	Within 6 feet
	25	Copper River Seafoods, INC.	[REDACTED]	7 Day(s)	8 hrs/day	Within 6 feet
	1	Copper River Seafoods, INC.	[REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet
	91	Copper River Seafoods, INC.	[REDACTED]	7 Day(s)	8 hrs/day	Within 6 feet
	11	Copper River Seafoods, INC.	[REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet
	83	Copper	[REDACTED]	7 Day(s)	8 hrs/day	Within 6

		River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:			feet
2		Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet
3		Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet
4		Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet
6		Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet
7		Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet
8		Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet
9		Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet

			Home Phone: Personal Mobile:			
	10	Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet
	12	Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet
	13	Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet
	14	Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet
	15	Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet
	16	Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet
	17	Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet
	18	Copper	[REDACTED]	7 Day(s)	8 hrs/day	Within 6

		River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:			feet
19		Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet
20		Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet
21		Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet
22		Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet
23		Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet
24		Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet
26		Copper River Seafoods, INC.	[REDACTED] [REDACTED]	7 Day(s)	8 hrs/day	Within 6 feet

			Home Phone: Personal Mobile:			
27	Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet	
28	Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet	
29	Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet	
30	Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet	
31	Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet	
32	Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet	
33	Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet	
34	Copper	[REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6	

		River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:			feet
	35	Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet
	36	Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet
	37	Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet
	38	Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet
	39	Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet
	40	Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet
	41	Copper River Seafoods, INC.	[REDACTED] [REDACTED] [REDACTED]	7 Day(s)	8 hrs/day	Within 6 feet

			Home Phone: Personal Mobile:			
	42	Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet
	43	Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet
	44	Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet
	46	Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet
	47	Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet
	48	Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet
	49	Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet
	50	Copper	[REDACTED]	7 Day(s)	8 hrs/day	Within 6

		River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:			feet
51		Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet
52		Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet
53		Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet
54		Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet
55		Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet
56		Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet
57		Copper River Seafoods, INC.	[REDACTED] [REDACTED] [REDACTED]	7 Day(s)	8 hrs/day	Within 6 feet

			Home Phone: Personal Mobile:			
58	Copper River Seafoods, INC.	[REDACTED] [REDACTED]	Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet
59	Copper River Seafoods, INC.	[REDACTED] [REDACTED]	Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet
60	Copper River Seafoods, INC.	[REDACTED] [REDACTED]	Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet
61	Copper River Seafoods, INC.	[REDACTED] [REDACTED]	Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet
62	Copper River Seafoods, INC.	[REDACTED] [REDACTED]	Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet
63	Copper River Seafoods, INC.	[REDACTED] [REDACTED]	Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet
64	Copper River Seafoods, INC.	[REDACTED] [REDACTED]	Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet
65	Copper	[REDACTED]		7 Day(s)	8 hrs/day	Within 6

		River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:			feet
66		Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet
67		Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet
68		Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet
69		Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet
70		Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet
71		Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet
72		Copper River Seafoods, INC.	[REDACTED] ANCHORAGE AK 99501	7 Day(s)	8 hrs/day	Within 6 feet

			Home Phone: Personal Mobile:			
73	Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet	
74	Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet	
75	Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet	
76	Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet	
77	Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet	
78	Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet	
79	Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet	
80	Copper	[REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6	

		River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:			feet
81		Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet
82		Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Week(s)	8 hrs/day	Within 6 feet
84		Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet
85		Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet
86		Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet
87		Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet
88		Copper River Seafoods, INC.	[REDACTED] [REDACTED]	7 Day(s)	8 hrs/day	Within 6 feet

			Home Phone: Personal Mobile:			
	89	Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet
	90	Copper River Seafoods, INC.	[REDACTED] [REDACTED] Home Phone: Personal Mobile:	7 Day(s)	8 hrs/day	Within 6 feet

Worksheet Details

A) Hazards-Operation/Condition-Accident: Operating a fish processing plant with employees who were exhibiting symptoms consistent with COVID-19, no social distancing, no physical barriers, no effective employee screening, and continuing the same practices after experiencing a large outbreak among employees.

B) Equipment: Fish processing equipment.

C) Location: 1400 E. 1st Ave., Anchorage, AK 99501.

D) Injury/Illness (and Justifications for Severity and Probability): Exposure to Novel Coronavirus can cause death and/or permanent disability; In July 2020, 92 CRS employees became infected with COVID at the facility.

E) Measurements: Less than six feet between employees on the production line and throughout the facility.

F) Employer Knowledge: CRS authored their first version of the COVID-19 Mitigation Plan as required by the State of Alaska on March 27, 2020. CRS received initial approval from the State of Alaska on July 6, 2020. The State of Alaska Medical Plan Review Task Force conducted an additional medical and epidemiological review of the plan and issued two findings regarding the work protection plan in a letter dated 7/6/20, stating: "Integrating findings from the medical and epidemiological review will strengthen protective measures already enacted while improving processes for reporting, transporting, protecting the workforce, and testing and treating workers with COVID-19. Protective measures and procedures are critical to safeguarding your employees and the citizens of the communities in which you operate, both this season and in future years". The two findings identified were: "Need to address the use of PCR testing" and "What happens if a positive case happens". Version 8 was provided, which was authored on August 5, 2020. Section VIII b ii states: "Where practical and in consideration for food safety, line employees are kept 6 feet from each other and/or have barriers between them when working <6 feet from another employee. IMPORTANT: see exemption note in section IV.c.ii". Section IV.c.ii does not exist within Version 8 of the document. Revision 6 of the

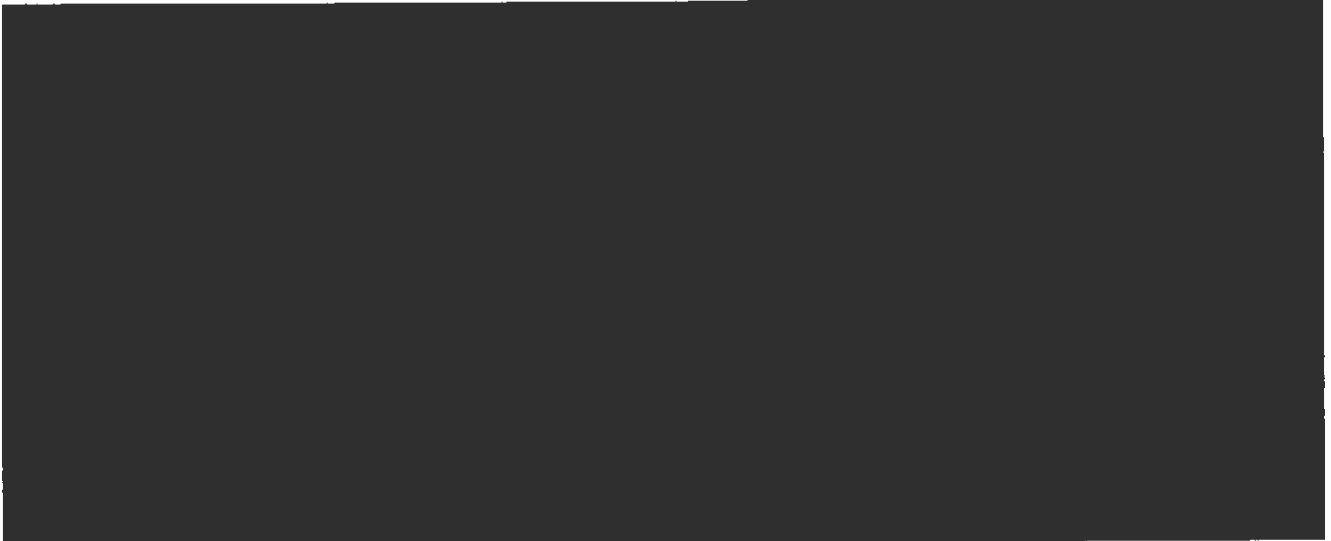
COVID Mitigation Plan was also provided, which was dated July 23, 2020 (which was the day after the extensive COVID-19 testing had concluded at the work site). Section IV.c.ii within that plan states:

SPECIAL EXEMPTION

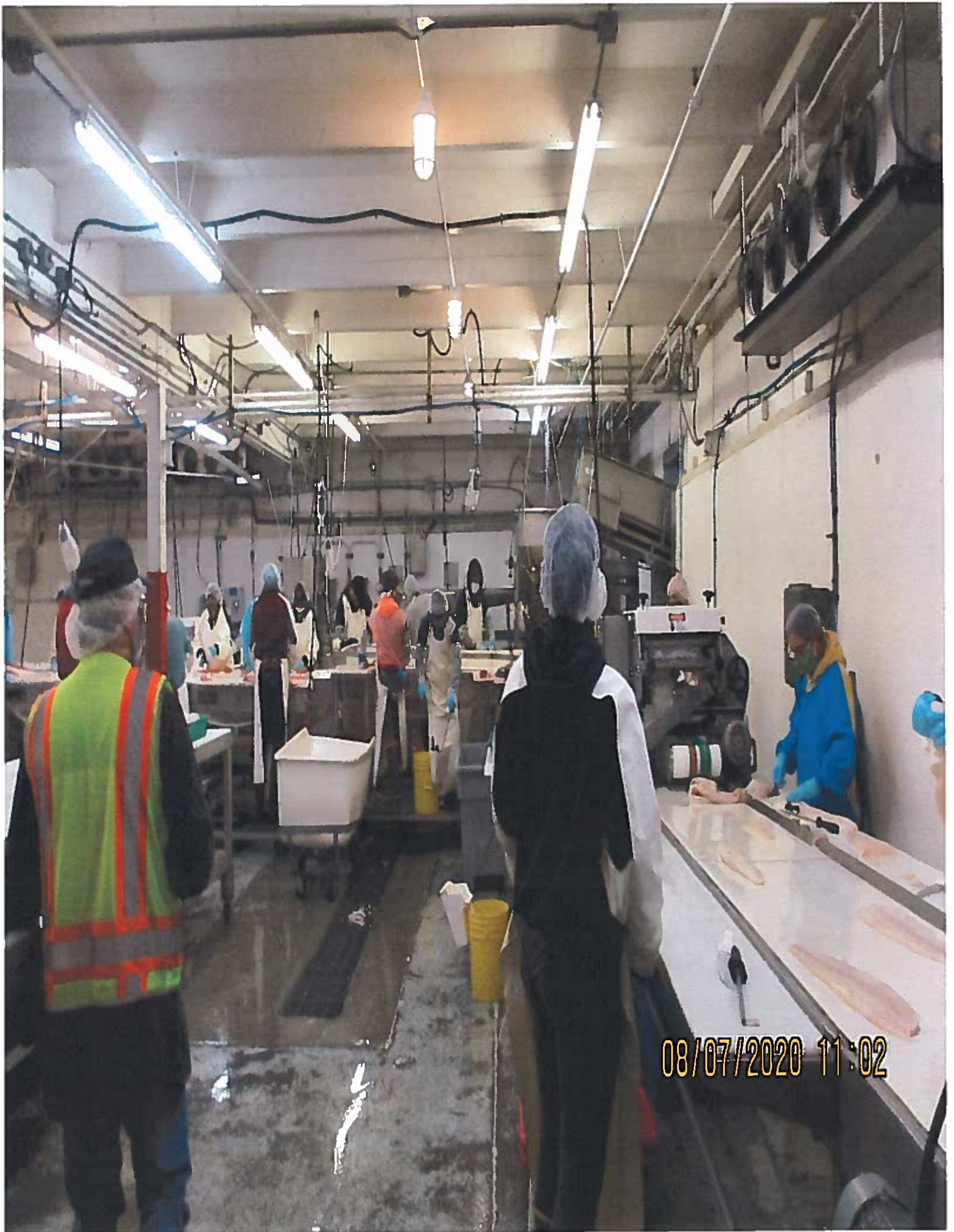
Copper River Seafoods, Inc. is considered a Critical Infrastructure Company. All employees of the company and all contracted workers who have been employed by the company to conduct Critical Infrastructure work are considered exempt from federal, state, and local restrictions such as social distancing. The company will make every attempt to put social distancing protocols into place, however, due to equipment, workspace, and other constraints, this may not be feasible in many situations.

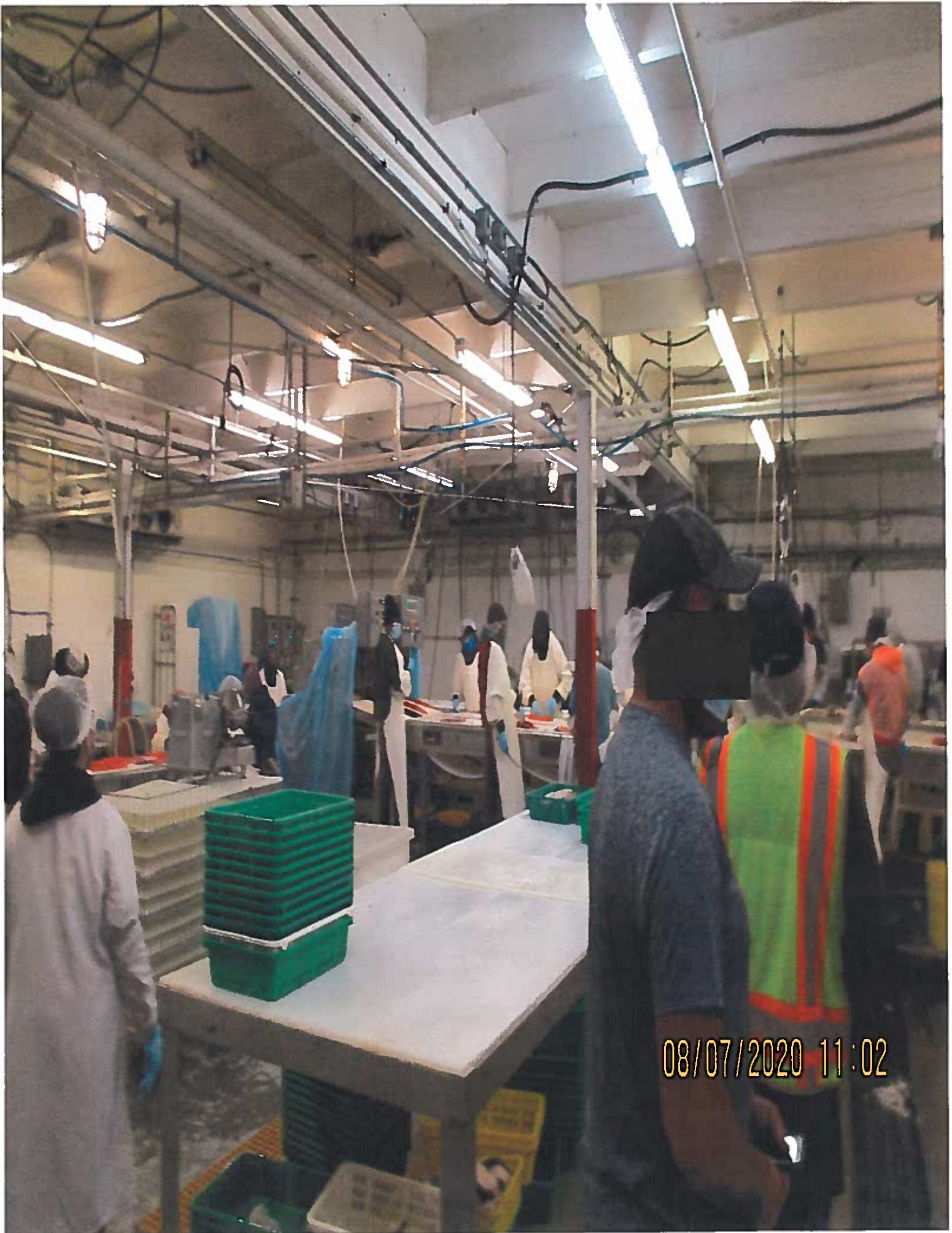
When asked about this exemption, CRS stated that it was contained within a previous version of State of Alaska Health Mandate 10, Appendix 01 (previously known as Attachment A). According to the Department of Health and Social Services, no such exemption was ever written by the State of Alaska. A review of all publications authored by Federal entities also failed to provide such an exemption. The plan required employees' temperatures to be screened at the beginning of their shift. Temperature logs submitted showed severe deficiencies to include as many as 35 out of 135 employees whose temperature was not taken for their shift (7/19/20), temperatures which if accurate would reflect 99 employees experiencing moderate to severe hypothermia on at least one day they worked, as well as four employees experiencing a fever at the time their temperature was taken. Of these four, one employee was documented on July 18, 2020, as having a fever and a cough and was still allowed to work for eight hours on that day. Despite the facility experiencing a COVID outbreak that infected 92 employees, no additional precautions were taken once the facility reopened. CRS demonstrated employer knowledge of the need for barriers when they installed them in the reception area of the plant, and they demonstrated knowledge of administrative controls when they began controlling access to the plant and requiring visitors to have their temperature checked.

G) Comments: In employee interviews, employees stated: "



H) Other Employer Information: N/A





08/07/2020 11:02



















