

State of California

Department of Industrial Relations
Division of Occupational Safety and Health
American Canyon District Office
3419 Broadway Street Ste H8
American Canyon, CA 94503
Phone: (707) 649-3700 Fax: (707) 649-3712

Inspection #: 1520047
Inspection Dates: 03/16/2021 - 07/07/2021
Issuance Date: 07/07/2021
CSHO ID: S0358
Optional Report #: 019-21



Citation and Notification of Penalty

Company Name: Transition Nutrition Inc
Establishment DBA:

and its successors
Inspection Site: 20 Pamaron Way
Novato, CA 94949

Citation 1 Item 1 Type of Violation: **General**

T8 CCR Section 3205(c):

(c) Written COVID-19 Prevention Program. Employers shall establish, implement, and maintain an effective, written COVID-19 Prevention Program, which may be integrated into the employer's Injury and Illness Program required by section 3203, or be maintained in a separate document. The written elements of a COVID-19 Prevention Program shall include:

- (1) System for communicating. The employer shall do all of the following in a form readily understandable by employees.**
- (2) Identification and evaluation of COVID-19 hazards.**
- (3) Investigating and responding to COVID-19 cases in the workplace.**
- (4) Correction of COVID-19 hazards. Employers shall implement effective policies and/or procedures for correcting unsafe or unhealthy conditions, work practices, policies and procedures in a timely manner based on the severity of the hazard. This includes, but is not limited to, implementing controls and/or policies and procedures in response to the evaluations conducted under subsections (c)(2) and (c)(3) and implementing the controls required by subsection (c)(6) through (c)(8).**
- (5) Training and instruction. The employer shall provide effective training and instruction to employees.**
- (6) Physical distancing.**
- (7) Face coverings.**
- (8) Other engineering controls, administrative controls, and personal protective equipment.**
- (9) Reporting, recordkeeping, and access.**
- (10) Exclusion of COVID-19 cases. The purpose of this subsection is to limit transmission of COVID-19 in the workplace.**
- (11) Return to work criteria.**

Prior to and during the course of inspection, including but not limited to, on March 16, 2021, the employer failed to have established a written COVID-19 Prevention Program that included the elements set forth in Subsections (c)(1) through (c)(11).

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| Date By Which Violation Must be Abated: | Corrected During Inspection |
| Proposed Penalty: | \$350.00 |

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Citation 1 Item 2 Type of Violation: **General**

T8 CCR Section 3205(c):

(c) Written COVID-19 Prevention Program. Employers shall establish, implement, and maintain an effective, written COVID-19 Prevention Program, which may be integrated into the employer's Injury and Illness Program required by section 3203, or be maintained in a separate document. The written elements of a COVID-19

(6) Physical distancing.

(A) All employees shall be separated from other persons by at least six feet, except where an employer can demonstrate that six feet of separation is not possible, and except for momentary exposure while persons are in movement. Methods of physical distancing include: telework or other remote work arrangements; reducing the number of persons in an area at one time, including visitors; visual cues such as signs and floor markings to indicate where employees and others should be located or their direction and path of travel; staggered arrival, departure, work, and break times; and adjusted work processes or procedures, such as reducing production speed, to allow greater distance between employees.

Prior to and during the course of inspection, including but not limited to, on March 16, 2021, the employer failed to ensure that employees were separated from other employees by at least six feet while working in the sorting area and during lunch in the breakroom.

Date By Which Violation Must be Abated: **Corrected During Inspection**
Proposed Penalty: **\$350.00**

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Citation 1 Item 3 Type of Violation: **General**

T8 CCR Section 3205(c):

(c) Written COVID-19 Prevention Program. Employers shall establish, implement, and maintain an effective, written COVID-19 Prevention Program, which may be integrated into the employer's Injury and Illness Program required by section 3203, or be maintained in a separate document. The written elements of a COVID-19

(7) Face coverings.

(A) Employers shall provide face coverings and ensure they are worn by employees over the nose and mouth when indoors, when outdoors and less than six feet away from another person, and where required by orders from the CDPH or local health department. Employers shall ensure face coverings are clean and undamaged. Face shields are not a replacement for face coverings, although they may be worn together for additional protection. The following are exceptions to the face coverings requirement:

1. When an employee is alone in a room.
2. While eating and drinking at the workplace, provided employees are at least six feet apart and outside air supply to the area, if indoors, has been maximized to the extent possible.
3. Employees wearing respiratory protection in accordance with section 5144 or other title 8 safety orders.
4. Employees who cannot wear face coverings due to a medical or mental health condition or disability, or who are hearing-impaired or communicating with a hearing-impaired person.
5. Specific tasks which cannot feasibly be performed with a face covering. This exception is limited to the time period in which such tasks are actually being performed, and the unmasked employee shall be at least six feet away from all other persons unless unmasked employees are tested at least twice weekly for COVID-19.

Prior to and during the course of inspection, including but not limited to, on March 16, 2021, the employer failed require or ensure the use of face coverings by employees when working in the sorting area and while in the breakroom

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| Proposed Penalty: | \$350.00 |

Perry Churchill / Kathy Lynn Garner
Compliance Officer / District Manager