



Northern Natural Gas Company
P.O. Box 3330
Omaha, NE 68103-0330
402 398-7200

January 18, 2021

Via eFiling

Ms. Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Re: Northern Natural Gas Company
Docket No. CP20-503-000
Northern Lights 2021
Response to EPA comments

Dear Ms. Bose:

On January 14, 2021, the U.S. Environmental Protection Agency (EPA) submitted comments on the record in this docket recommending the Federal Energy Regulatory Commission and Northern Natural Gas “identify the measures Northern would implement to prevent and reduce the spread of the coronavirus due to project construction related activities.” EPA recommends that these measures become mandatory if a certificate is issued. EPA also recommends Northern develop a project-specific plan in consultation with the Centers for Disease Control and the Minnesota Department of Health and in compliance with Occupational Safety and Health Administration standards.

In reply, Northern notes that the company has been proactive in responding to the coronavirus since the early stages of the COVID-19 pandemic. On March 19, 2020, Northern adopted its “COVID-19 Construction Plan Requirements” that applies to all contractors conducting construction activities for Northern. The Plan, which is attached, requires contractors to adopt protocols to prevent and detect the presence of the virus. Northern enforces contractor agreements rigorously and regularly determines on-site compliance with the Plan. Northern commits to the use of this Plan and agreements with the contractors working for Northern for the Northern Lights 2021 project. Further, Northern will abide by all state and local standards and guidance established in response to the COVID-19 pandemic.

As an example, Northern has attached the Infectious Disease Control Policy and Continuation of Work Plan used by a Northern contractor for construction projects in 2020; this document illustrates the measures implemented by Northern’s contractors to prevent and reduce the spread of the coronavirus.

Kimberly D. Bose, Secretary
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Northern requests FERC consider the measures discussed above and the implementation of the Plan and related agreements that Northern will have with Northern Lights 2021 project contractors to be responsive to EPA concerns.

/signed/ Michael T. Loeffler

Michael T. Loeffler
Senior Director, Certificates and External Affairs

cc: Parties of record

March 19, 2020

1. PURPOSE

Due to the continuously evolving nature of the ongoing pandemic, and the critical service Northern Natural Gas provides the communities it serves, all contractors completing work for Northern Natural Gas must have effective plans and procedures in place to address COVID-19 considerations. This communication documents the requirements for such plans.

2. PLAN ELEMENTS

2.1 Each contractor shall provide Northern Natural Gas its pandemic protocol, including preventative measures and plans, plans for individuals experiencing symptoms, plans for individuals exposed to those experiencing symptoms, plans for those exposed to individuals testing positive for COVID-19.

2.2 In addition to its general pandemic protocol, contractors shall provide Northern Natural Gas virus response plans for contracted construction work. The plans shall include the items listed below at a minimum. Plan elements can be general for all construction projects, but may need to be specific to specific constructions projects.

2.2.1 Any virus-related conditions that would preclude the contractor from mobilizing to the project site or would result in the contractor demobilizing from site prior to project completion.

2.2.2 Plans to mitigate virus transmission on project sites, including measures taken to support social distancing, personal hygiene (wash stations), symptom monitoring, disinfecting common areas, etc.

2.2.3 Plans to work around potential hotel restrictions or shortages.

2.2.4 Plans to manage potential road/travel restrictions.

2.2.5 Any project involving a critical facility outage must have a return-to-service plan to ensure facilities are returned to service effectively in the event construction activities are interrupted by virus-related conditions. This can include a general plan for how contractors will manage critical work in the event crews must demobilize due to contamination.

2.2.6 In addition to a general return-to-service plan, contractors must provide a specific return-to-service plan for projects involving critical outages. Put simply, if we cut into a pipeline or otherwise impose a critical facility outage, we must have a plan to return it to service in the event on a construction interruption. Northern Natural Gas will notify contractors when projects require a specific plan.

2.2.7 Plans to hold subcontractors to similar standards.

3. GENERAL

3.1 Through the entirety of the pandemic, contractors will not have access to Northern Natural Gas offices, restroom facilities, or any buildings not directly related to the scope of work constructed. Contractors must plan to provide their own office spaces, facilities, wash stations, etc., and will be asked to provide similar facilities for company inspectors.

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- 3.2 If there are any potential implications not mentioned herein that contractors believe it or Northern Natural Gas should be considering in regards to construction projects during the pandemic, please advise in your specific plan.
- 3.3 Like Northern Natural Gas, its third-party installation contractors provide a critical service to supply a greater public need. While the ongoing pandemic creates a number of high-level inconveniences and necessitates an incremental level of preparedness and project planning, it is Northern Natural Gas' expectation that construction projects will proceed as planned, and that its contractors will meet their contractual obligations to complete projects timely and effectively.



Infectious Disease Control Policy **(COVID-19/Coronavirus)**

Michels Corporation (Michels) will take steps to protect the workplace in the event of an infectious disease outbreak. It is the goal of Michels during any such time period, to strive to operate at high levels of efficiency and to ensure that all essential services are continuously provided and that employees, subcontractors and the public are as safe and healthy as possible.

Michels is committed to monitoring various sources of data on infectious diseases/contagions (including but not limited to COVID-19) and we encourage our employees to actively do the same. We will strive to provide authoritative information about the nature and spread of infectious diseases, including symptoms and signs to watch for, as well as required steps to be taken in the event of an illness or outbreak. We will also attempt to monitor our supply chain partners to understand how they will manage any potential risks to their employees. We will also ask that they provide us with adequate assurance of their ability to perform and meet their obligations to Michels.

Preventing The Spread of Infection in The Workplace:

Michels will strive for a clean workplace, including the regular cleaning of objects and areas that are frequently used, such as; bathrooms, breakrooms, conference rooms, door handles and railings, drinking water dispensers, coffee pot handles, light switches, copier buttons etc. A committee led by the Executive Vice President or Vice President of Health, Safety & Environment (“HSE”), will be designated to monitor events and coordinate and/or modify this plan around an infectious disease outbreak, as well as, to create work rules that could be implemented to promote safety through infection control. This plan will be reviewed and updated as necessary to address evolving conditions and/or lessons- learned. Plan updates will be shared with employees as timely as possible by email or other mass communication tool and/or through discussion during regular scheduled meetings.

We will ask all employees to cooperate in taking steps to reduce the transmission of infectious disease in the workplace and will provide periodic training and/or guidance (i.e. tabletop exercise or mock situation response) to reduce the potential for same. The lessons learned from each pandemic situation, may be used as valuable takeaways for any future pandemic situations and training material. The best strategy is usually the most common—frequent hand washing with warm, soapy water; covering your nose and mouth whenever you sneeze or cough; and discarding used tissues in wastebaskets. We will also endeavor to supply sanitizer and/or antibacterial soap at all locations (contingent upon availability of same).

Unless otherwise notified, our normal attendance and leave policies will remain in place. Individuals who believe they may face particular challenges reporting to work during an infectious disease outbreak should take steps to develop any necessary contingency plans and communicate same to their immediate supervisors as soon as possible.



Consider The Necessity of Business Travel:

As with all other responsible business considerations and decisions, the necessity and practicality of air travel should be assessed and all nonessential travel should be avoided until further notice. Employees who travel as an essential part of their job should consult with management on appropriate actions.

Employees should avoid crowded public transportation when possible. Alternative scheduling options, ride-share resources and/or parking assistance may be provided on a case-by-case basis. Additional considerations include but are not limited to; are there alternative ways to accomplish the business needs (phone call, telepresence, or defer the meeting, etc.). Contact human resources for more information.

Personal Travel:

There is widespread, ongoing transmission of novel coronavirus worldwide (see [Global COVID-19 Pandemic Notice](#)). CDC recommends that travelers avoid all nonessential international travel.

- If an employee must travel they may be permitted to continue work following international travel, provided they remain asymptomatic and follow current applicable CDC guidelines for Critical Essential Infrastructure Workers (website: <https://www.cdc.gov/coronavirus/2019-ncov/community/critical-workers/implementing-safetypractices.html>) and only return if they are free of symptoms or, are medically cleared/fit for duty.
 - With the exception of where Michels, State or customer guideline requires more stringent protocols (i.e. a mandatory 14-day self-quarantine).
- Employees should self-monitor and stay home if they become symptomatic or ill with COVID-19.
- If an employee feels ill, or if someone observes an employee is exhibiting COVID-19 symptoms while at work, Human Resources must be contacted for further guidance.

Staying Home When Ill:

Many times, with the best of intentions, employees report to work even though they feel ill. During an infectious disease outbreak, it is critical that employees do not report to work while they are ill and/or experiencing the following symptoms. Employees who report to work ill will be sent home in accordance with these health guidelines.

- People with COVID-19 have had a wide range of symptoms reported – ranging from mild symptoms to severe illness. People with these symptoms may have COVID-19:
 - Fever (>100.4 degrees) or chills
 - Cough
 - Shortness of breath or difficulty breathing
 - Fatigue
 - Muscle or body aches
 - Headache
 - New loss of taste or smell
 - Sore throat
 - Congestion or runny nose
 - Nausea or vomiting
 - Diarrhea

- The CDC reports that symptoms of COVID-19 may appear in as few as 2 days or as long as 14 days after exposure to the virus.
- If you have a fever, cough or other symptoms you might have COVID-19. Most people have mild illness and are able to recover at home. Keep track of your symptoms. If you have an emergency warning sign (including trouble breathing), get medical attention right away.

Discontinuing Self-Isolation:

People **with suspected or confirmed COVID-19 who have stayed home (self-isolated)** may end their self-isolation under the following conditions:

- **If you have symptoms and ARE tested and receive a positive test result** you may leave home and return to regular work location only after the following three (3) things have occurred:
 - 24hrs with no fever (>100.4 degrees) without the use of fever reducing medicine **AND**
 - Respiratory symptoms have improved (e.g. cough, shortness of breath) **AND**
 - 10 days have passed since symptoms first appeared
- **If you are not symptomatic but are tested and receive a positive test result**, you may leave home/return to regular work location after:
 - 10 days have passed since test
 - You continue to have no symptoms
- **If you are tested and receive a negative test result**, you may leave home/return to regular work location after:
 - You no longer have a fever (>100.4 degrees) without the use of fever reducing medicine **AND**
 - Your other symptoms have improved (for example, when your cough or shortness of breath have improved)
- **If you are NOT tested but are symptomatic consistent with COVID-19** per current applicable CDC Guidelines you may leave the house/return to regular work location after all three (3) of the following things have occurred:
 - You have had **NO** fever (>100.4 degrees) for at least 24 hours (that is one full days of no fever without the use of fever reducing medicine) **AND**
 - your other symptoms have improved (for example, when your cough or shortness of breath have improved) **AND**
 - at least 10 days have passed since your symptoms first appeared

In all cases, follow the guidance of your healthcare provider and local health department. The decision to stop self-quarantine or self-isolation should be made in consultation with your healthcare provider and state and local health departments. Local decisions may depend on local circumstances.



Reporting Exposure/Potential Exposure:

Ensuring a safe and healthy workplace requires support, responsibility and personal accountability from all employees. At times, the anxiety and/or concern regarding the spread of an infectious disease may lead to many “what if” questions from our employees. Our COVID-19 Hotline (920.583.2929 or extension 1340) should be contacted for questions or to report a situation of potential exposure.

- Employees exhibiting the signs and symptoms listed above should stay home or leave work and seek medical attention and if necessary self-isolate until medically cleared.
- If you test positive for COVID -19 Michels expects and requires your cooperation in identifying any individuals with whom you have been in close contact with while at work so they can self-quarantine or self-isolate, if necessary. Close contact(s) should be considered starting from 72 hours before symptom onset (or, if you are asymptomatic, starting 72 hours prior to your positive test date) through the time you were able to isolate.
- Employees that were in close contact with a person that tested positive for COVID-19 should follow current applicable CDC guidelines for Critical Essential Infrastructure Workers (website: <https://www.cdc.gov/coronavirus/2019-ncov/community/critical-workers/implementing-safety-practices.html>) and only return if they are free of symptoms or, are medically cleared/fit for duty.
 - With the exception of where Michels, State or customer guidelines require more stringent protocols (i.e. a mandatory 14-day self-quarantine following confirmed or potential exposure).
- Employees that have had “close contact” with a person that may have been exposed should self-monitor and stay home if they become symptomatic or ill with COVID-19.
- Gauging Potential Exposure (aka: How do I know if I was exposed?)

An individual generally needs to be in “close contact” with a sick person to get infected. Close contact includes but is not limited to:

- Living in the same household as a sick person with COVID-19,
- Caring for a sick person with COVID-19,
- Being within 6 feet of a sick person with COVID-19 for 15 minutes cumulative in a 24 hour period), OR
- Being in direct contact with secretions from a sick person with COVID-19 (e.g., being coughed on, kissing, sharing utensils, etc.)

Note: *This is irrespective of whether the person with COVID-19 or the contact was wearing a facial covering/mask or whether the contact was wearing respiratory personal protective equipment (PPE)*

If an employee has not been in close contact with a sick person with COVID-19, they are at low risk for infection. The employee can continue to go to work and should monitor their health for 14 days since the contact and stay away from others if they get sick.

- If an employee feels ill, or if someone observes an employee is exhibiting COVID-19 symptoms while at work, Human Resources must be contacted for further guidance.



When possible, Michels will provide necessary notification to our sub-contractors, vendors, customers, and others that may have been exposed to a Michels employee that has become symptomatic and/or tested positive for COVID-19. Notification should also be provided if work is suspended or cancelled and when work resumes again per the contractual agreement (i.e. email, certified letter, etc.) we have with each party/customer.

Prevention:

There is currently no vaccine to prevent coronavirus disease 2019 (COVID-19). The best way to prevent illness is to avoid being exposed to this virus. However, the United States Centers for Disease Control and Prevention (CDC) and the World Health Organization (WHO) always recommends everyday preventive actions to help prevent the spread of respiratory diseases, including:

- Wash your hands often with soap and water for at least 20 seconds, especially after going to the bathroom; before eating; and after blowing your nose, coughing, or sneezing.
- If soap and water are not readily available, use an alcohol-based hand sanitizer with at least 60% alcohol.
- Avoid close contact with people who are sick.
- Stay home when you are sick.
- Avoid touching your eyes, nose, and mouth, and wash your hands before and after doing so.
- Keep noses and mouths covered with a tissue (then throw the tissue in the trash) or your bent elbow/forearm when coughing or sneezing.
- Clean and disinfect frequently touched objects and surfaces using a regular household cleaning spray or wipe.
- Put distance (6-10 feet/2-3 meters) between yourself and other people.
- If you have not yet had a flu shot or other appropriate immunization(s), consider contacting your doctor about getting one. Many national pharmacies also offer flu shots on a walk-in basis.
- Refrain from shaking or touching the hands of others.

Requests for Medical Information and/or Documentation:

If you are out sick or show symptoms of being ill, it may become necessary to request information from you and/or your health care provider. In general, we would request medical information to confirm your need to be absent, to show whether and how an absence relates to the infection, and to know that it is appropriate for you to return to work. As always, we expect and appreciate your cooperation if and when medical information is sought.

Confidentiality of Medical Information:

Our policy is to treat any medical information as a confidential medical record. In furtherance of this policy, any disclosure of medical information is in limited circumstances with supervisors, managers, first aid and safety personnel, and government officials as required by law.



Social Distancing Guidelines for Workplace Infectious Disease Outbreaks:

In the event of an infectious disease outbreak, Michels Corporation may implement additional social distancing guidelines to minimize the spread of the disease among personnel.

During the workday, employees are requested to:

1. When possible, avoid meeting people face-to-face. Employees are encouraged to use the telephone, online video conferencing, e-mail or instant messaging to conduct business as much as possible, even when participants are in the same building.
2. If a face-to-face meeting is unavoidable, minimize the meeting time, choose a large meeting room and sit at least 6 feet/3 meters from each other if possible; avoid person-to-person contact such as shaking hands.
3. Avoid any unnecessary travel and cancel or postpone nonessential meetings, gatherings, workshops and training sessions.
4. Avoid using other employees' phones, desks, offices, or other work tools and equipment, when possible. Clean and disinfect them before and after use.
5. Do not congregate in work rooms, pantries, copier rooms or other areas where people socialize.
6. Bring lunch and eat at your desk or away from others (avoid lunchrooms and crowded restaurants).
7. Encourage members and others to request or discuss information and orders via phone and e-mail in order to minimize person-to-person contact. Have the orders, materials and information ready for fast pick-up or delivery.
8. Wear a facial covering/mask while in common areas (such as; hallways, stairwells, around coffee stations, etc.) and/or at all times when social distancing is not possible or practical.

Other Steps:

Depending on the severity of the infectious disease outbreak where we operate and details of our operations, Michels reserves the right to implement additional measures and work rules to provide a safe work place.



Continuation of Work Plan

Michels Corporation (Michels) will take steps to protect the workplace in the event of an infectious disease outbreak. It is the goal of Michels during any such time period to strive to operate effectively and ensure that all essential services are continuously provided and that employees and subcontractors are safe and healthy within the workplace. This Continuation of Work Plan is intended to supplement the most current version of *Michels Infectious Disease Control Policy*.

Michels is committed to monitoring various sources of data on infectious diseases/contagions (including but not limited to COVID-19) and we encourage our employees to do the same. We will strive to provide authoritative information about the nature and spread of infectious diseases, including symptoms and signs to watch for, as well as required steps to be taken in the event of an illness or outbreak. We will also attempt to monitor our supply chain partners to understand how they will manage any potential risks to their employees. We will also ask that they provide us with adequate assurance of their ability to perform and meet their obligations to Michels.

Preventing the Spread of Infection in the Workplace

Site Access:

In an effort to keep our employees and others working at our remote or field locations as safe and healthy as possible, Michels will not be permitting outside visitors, vendors, or sales calls to enter our work location/site without an appointment.

Each employee/visitor seeking access to our work location may have to answer questions or provide information regarding signs, symptoms, and/or exposure/potential exposure to the COVID-19 disease. Individuals are not permitted to access the work area unless they are free of the signs and symptoms of COVID-19 or other infectious diseases and have not knowingly been in contact with anyone showing the signs and symptoms within the last 14 days. These symptoms include but are not limited to; fever (100.4° F [38.0° C] or greater using an oral thermometer), signs of a fever, and cough or shortness of breath.

- Individuals that are not permitted access due to health concerns should seek medical attention and avoid contact with others (self-quarantine) until speaking with a healthcare professional.
- Individuals that are not permitted access are expected to return to their point of origin and make contact with a health care professional. Do not go to the hospital or clinic unless advised to do so by a health care professional.

Because the situation of an infectious disease spread can change quickly it is recommended to leave the site each day secure and able to be left unattended for an extended period of time should a delay in work occur without warning (i.e. safety and silt fencing installed, parts trailers closed and locked, etc.).

Staying Home When Ill:

Many times, with the best of intentions, employees report to work even though they feel ill. During an infectious disease outbreak, it is critical that employees do not report to work while they are ill and/or experiencing symptoms associated with COVID-19. Refer to Michels Infectious Disease Policy for guidance pertaining to return-to-work protocols. Employees who report to work ill will be sent home in accordance with these health guidelines.

- Signs and symptoms of COVID-19:
 - Fever (>100.4 degrees) or chills
 - Cough
 - Shortness of breath or difficulty breathing
 - Fatigue
 - Muscle or body aches
 - Headache
 - New loss of taste or smell
 - Sore throat
 - Congestion or runny nose
 - Nausea or vomiting
 - Diarrhea

General Hygiene:

There is currently no vaccine to prevent coronavirus disease 2019 (COVID-19). The best way to prevent illness is to avoid being exposed to this virus. However, the United States Centers for Disease Control and Prevention (CDC) and the World Health Organization (WHO) always recommends everyday preventive actions to help prevent the spread of respiratory diseases, including:

- Wash your hands often with soap and water for at least 20 seconds, especially after going to the bathroom; before eating; and after blowing your nose, coughing, or sneezing.
- If soap and water are not readily available, use an alcohol-based hand sanitizer with at least 60% alcohol.
- Keep noses and mouths covered with a tissue (then throw the tissue in the trash) or your bent elbow/forearm when coughing or sneezing,
- Clean and disinfect frequently touched objects and surfaces using a regular household cleaning spray or wipe.
- If you have not yet had a flu shot or other appropriate immunization(s), consider contacting your doctor about getting one. Many national pharmacies also offer flu shots on a walk-in basis.

Additional Guidance for field/shop locations:

- Practice social distancing during work activities, which should include;
 - Avoid sharing or passing items between individuals when feasible (i.e. meeting rosters, JSA/Toolbox forms, pens, ID's, paperwork, etc.)
 - Only one person should complete necessary forms/permits to begin work and record attendance. The forms can be communicated verbally to the group to avoid physically sharing the document(s) for signatures or review.
 - Avoid personal contact such as handshakes
 - Avoid doubling-up personnel on tasks that only require one person to safely complete
 - Maintain at least 6ft. of separation between individuals when feasible. If 6 feet of separation is not feasible then ensure adequate hazard controls (i.e. good hygiene)



habits, increased frequency of disinfecting hands and work areas/tools, face coverings, etc.) are in place to protect the individuals

- Face coverings are required to be worn when;
 - An individual is in a public or common area where 6 feet of separation could be unintentionally breached by others entering the area, such as lobbie, hallways, stairways, restrooms, office trailers, or shared vehicles,
 - In a room/office where social distancing cannot be maintained and physical barriers are not in place
 - Outdoors and 6 feet of distance cannot be maintained.
 - Where required by state or local order and/or required by owner company (property owner).
- We ask that the supervisor (i.e. Foreman or Straw-boss) be responsible for, or designate a “social distancing coordinator” to help ensure we maintain a safe separation between team memebbers while working.
- Do not congregate at work or lunch breaks and avoid “common” areas when possible
- Attempt to limit groups or gatherings and maintain at least 6 feet of separation. Training classrooms should be set up to allow for social distancing. Wash hands or use hand sanitizer upon entry and as exiting rooms/office trailers
- Meetings should be held outside with participants facing upwind when possible.
- Admittance to office trailers and warehouse trailers should be limited to only necessary personnel (i.e. those whom have desks in the office) and social distancing should be practiced.
- Frequently clean/sanitize tools, equipment, and common surfaces throughtout the work area

Reporting Exposure/Potential Exposure

Ensuring a safe and healthy workplace requires support, responsibility and personal accountability from all employees. At times, the anxiety and/or concern regarding the spread of an infectious disease may lead to many “what if” questions from our employees. Our Human Resource Hotline (920.583.2929 or extension 1340) should be contacted for questions or to report a situation of potential exposure.

When possible, Michels will provide necessary notification to our sub-contractors, vendors, customers, and others that may have been exposed to a Michels employee that has become symptomatic and/or tested positive for COVID-19. Notification of work delays or suspensions will be made as required per contractual agreements.

Lodging and Travel Restrictions

Though the situation regarding COVID-19 is ever-changing, Michels intends to provide continuous service to our employees, our customers, and our sub-contractors. At this time we do not foresee any interruptions in the service we are providing, however it is possible that we may be faced with travel bans, food and lodging shortages, and/or projects being delayed due to actions taken by governmental offices to reduce the spread of COVID-19. A few of these



concerns are listed below with our plan of action at this time. This list is not all inclusive and our specific plan of action may be altered given the situation at the time. We also ask that Northern Natural Gas support our efforts in ensuring uninterrupted service.

- Road/Travel Restrictions
 - Our operations team will continue to work with our internal Logistics Coordinator for all routes, uses, bonding, and permitting of roads and haul routes. If these routes change due to restrictions we will seek alternate routes and ensure permitting and bonding is in place when needed.
 - Michels also asked that Northern Natural Gas assist in our continuation of work/travel through our partnership and the ongoing need for essential businesses to remain open and working.
- Hotel/Lodging Shortages
 - To ensure lodging for our team members, Michels may contact service providers (i.e. hotels, motels, campgrounds, etc.) and secure lodging for the expected duration of the project. This may require additional commute time each day but we intend to locate suitable lodging for our crews.
 - When necessary, lodging may be brought to the area for our crews using mobile bunkhouses or similar products/services.
- Evacuation or Quarantine of Crew
 - Michels has a robust roster of qualified professionals that can be quickly mobilized anywhere in the country. Though we never wish to change teams mid-project, we can accommodate that situation if necessary.

Medical Information and/or Documentation

Requests for Medical Information and/or Documentation:

If you are out sick or show symptoms of being ill, it may become necessary to request information from you and/or your health care provider. In general, we would request medical information to confirm your need to be absent, to show whether and how an absence relates to the infection, and to know that it is appropriate for you to return to work. As always, we expect and appreciate your cooperation if and when medical information is sought.

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Other Steps

Depending on the severity of the infectious disease outbreak where we operate and details of our operations, Michels reserves the right to implement additional measures and work rules to provide a safe work place.