

**State of California**

Department of Industrial Relations  
Division of Occupational Safety and Health  
Foster City District Office  
1065 East Hillsdale Blvd, Suite 110  
Foster City, CA 94404  
Phone: (650) 573-3812 Fax: (650) 573-3817

**Inspection #:** 1483438  
**Inspection Dates:** 07/15/2020 - 12/22/2020  
**Issuance Date:** 12/23/2020  
**CSHO ID:** C8043  
**Optional Report #:** 006-21



**Citation and Notification of Penalty**

**Company Name:** Mills-Peninsula Medical Center  
**Establishment DBA:**

and its successors

**Inspection Site:** 1501 Trousdale Dr.  
Burlingame, CA 94010

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

**Title 8 CCR Section 342(a). Reporting Work-Connected Fatalities and Serious Injuries.**

Every employer shall report immediately to the Division of Occupational Safety and Health any serious injury or illness, or death, of an employee occurring in a place of employment or in connection with any employment. The report shall be made by the telephone or through a specified online mechanism established by the Division for this purpose. Until the division has made such a mechanism available, the report may be made by telephone or email.

Immediately means as soon as practically possible but not longer than 8 hours after the employer knows or with diligent inquiry would have known of the death or serious injury or illness. If the employer can demonstrate that exigent circumstances exist, the time frame for the report may be made no longer than 24 hours after the incident.

Serious injury or illness is defined in section 330(h), Title 8, California Administrative Code. {Ref Title 8 Section 330(h) Serious injury or illness means any injury or illness occurring in a place of employment or in connection with any employment that requires inpatient hospitalization for other than medical observation or diagnostic testing, or in which an employee suffers an amputation, the loss of an eye, or any serious degree of permanent disfigurement, but does not include any injury or illness or death caused by an accident on a public street or highway, unless the accident occurred in a construction zone.}

The Employer failed to immediately report to the Division of Occupational Safety and Health the serious illness suffered by an employee who was hospitalized with COVID-19 for about two days starting on or about April 7, 2020.

**Date By Which Violation Must be Abated:** January 04, 2021  
**Proposed Penalty:** \$5000.00

**State of California**

Department of Industrial Relations  
Division of Occupational Safety and Health  
Foster City District Office  
1065 East Hillsdale Blvd, Suite 110  
Foster City, CA 94404  
Phone: (650) 573-3812 Fax: (650) 573-3817

**Inspection #:** 1483438  
**Inspection Dates:** 07/15/2020 - 12/22/2020  
**Issuance Date:** 12/23/2020  
**CSHO ID:** C8043  
**Optional Report #:** 006-21

**Citation and Notification of Penalty**

**Company Name:** Mills-Peninsula Medical Center

**Establishment DBA:**

and its successors

**Inspection Site:** 1501 Trousdale Dr.  
Burlingame, CA 94010

---

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

**Title 8 CCR Section 5199(h)(6)(C). Aerosol Transmissible Diseases.**

**(h) Medical Services.**

**(6) Exposure Incidents.**

**(C) Each employer who becomes aware that his or her employees may have been exposed to an RATD case or suspected case, or to an exposure incident involving an ATP-L shall do all of the following:**

**1. Within a timeframe that is reasonable for the specific disease, as described in subsection (h)(6)(B), but in no case later than 72 hours following, as applicable, the employer's report to the local health officer or the receipt of notification from another employer or the local health officer, conduct an analysis of the exposure scenario to determine which employees had significant exposures. This analysis shall be conducted by an individual knowledgeable in the mechanisms of exposure to ATPs or ATPs-L, and shall record the names and any other employee identifier used in the workplace of persons who were included in the analysis. The analysis shall also record the basis for any determination that an employee need not be included in post-exposure follow-up because the employee did not have a significant exposure or because a PLHCP determined that the employee is immune to the infection in accordance with applicable public health guidelines. The exposure analysis shall be made available to the local health officer upon request. The name of the person making the determination, and the identity of any PLHCP or local health officer consulted in making the determination shall be recorded.**

**2. Within a timeframe that is reasonable for the specific disease, as described in subsection (h)(6)(B), but in no case later than 96 hours of becoming aware of the potential exposure, notify employees who had significant exposures of the date, time, and nature of the exposure.**

**3. As soon as feasible, provide post-exposure medical evaluation to all employees who had a**

**significant exposure. The evaluation shall be conducted by a PLHCP knowledgeable about the specific disease, including appropriate vaccination, prophylaxis and treatment. For M. tuberculosis, and for other pathogens where recommended by applicable public health guidelines, this shall include testing of the isolate from the source individual or material for drug susceptibility, unless the PLHCP determines that it is not feasible.**

**4. Obtain from the PLHCP a recommendation regarding precautionary removal in accordance with subsection (h)(8), and a written opinion in accordance with subsection (h)(9).**

**5. Determine, to the extent that the information is available in the employer's records, whether employees of any other employers may have been exposed to the case or material. The employer shall notify these other employers within a time frame that is reasonable for the specific disease, as described in subsection (h)(6)(B), but in no case later than 72 hours of becoming aware of the exposure incident of the nature, date, and time of the exposure, and shall provide the contact information for the diagnosing PLHCP. The notifying employer shall not provide the identity of the source patient to other employers.**

Prior to and during the course of inspection, the employer failed to investigate and provide notifications after an exposure incident that occurred in the Emergency Department on or about April 7, 2020, in the following instances:

Instance 1) Employer failed to conduct an exposure analysis to determine whether any employees had significant exposures to a co-worker who was a confirmed case of COVID-19. [5199(h)(6)(C)1]

Instance 2) The employer did not notify employees who had a significant exposure to a co-worker who was a confirmed COVID-19 case within 96 hours of becoming aware of the potential exposure. [5199(h)(6)(C)2]

Instance 3) The employer did not provide post-exposure medical evaluations to all employees who had a significant exposure to a co-worker who was a confirmed case of COVID-19, as soon as feasible. [5199(h)(6)(C)3]

Instance 4) The employer did not obtain from the PLHCP a recommendation regarding precautionary removal of employees who had a significant exposure to a co-worker who was a confirmed case of COVID-19 in accordance with subsection (h)(8), and a written opinion in accordance with subsection (h)(9). [5199(h)(6)(C)4]

Instance 5) The employer did not notify the other employer [Kaiser Redwood City Medical Center] of an employee's significant exposure to COVID-19, no later than 72 hours of becoming aware of the exposure incident. [5199(h)(6)(C)5]

**Date By Which Violation Must be Abated:  
Proposed Penalty:**

**January 08, 2021  
\$13500.00**

**State of California**

Department of Industrial Relations  
Division of Occupational Safety and Health  
Foster City District Office  
1065 East Hillsdale Blvd, Suite 110  
Foster City, CA 94404  
Phone: (650) 573-3812 Fax: (650) 573-3817

**Inspection #:** 1483438  
**Inspection Dates:** 07/15/2020 - 12/22/2020  
**Issuance Date:** 12/23/2020  
**CSHO ID:** C8043  
**Optional Report #:** 006-21



**Citation and Notification of Penalty**

**Company Name:** Mills-Peninsula Medical Center  
**Establishment DBA:**

and its successors

**Inspection Site:** 1501 Trousdale Dr.  
Burlingame, CA 94010

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

**Title 8 CCR Section 5199(i)(4)(G). Aerosol Transmissible Diseases.**

**(i) Training.**

**(4) The training program shall contain at a minimum the following elements:**

**(G) An explanation of the basis for selection of personal protective equipment, its uses and limitations, and the types, proper use, location, removal, handling, cleaning, decontamination and disposal of the items of personal protective equipment employees will use.**

Prior to and during the course of the inspection, including but not limited to the month of June 2020, the employer failed to provide effective training to employees on the explanation of the basis of personal protective equipment, its uses and limitations and the types, proper use, location, removal, and handling of gowns for use while caring for COVID-19 positive patients, in that the nurses on 3 West night shift engaged in the practice of donning, doffing, and storing their gowns inside of the COVID-19 positive patient rooms throughout their shift.

**Date By Which Violation Must be Abated:**  
**Proposed Penalty:**

**Corrected During Inspection**  
**\$6750.00**

Barbara Kim  
Compliance Officer / District Manager