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State of California—Health and Human Services Agency
California Department of Public Health



EDMUND G. BROWN JR.
Governor

April 5, 2018
Transmitted via email

Re: Preventing Occupational Valley Fever at Panoche Valley Solar Project

Dear Employer or Union Representative:

In October 2017, San Benito County Health Department, and the California Department of Public Health (CDPH) became aware that the California Division of Occupational Safety and Health (Cal/OSHA) was investigating a case of coccidioidomycosis (i.e., “Valley fever”) among a worker at the Panoche Valley Solar Project construction site in San Benito County, California. Cal/OSHA has since determined that there has been work-related Valley fever associated with the Panoche Valley Solar Project worksite and has issued a citation. CDPH has confirmed several cases of Valley fever in employees who worked on the Panoche Valley Solar Project and is investigating the details of the cases.

Valley fever is an illness that can be serious and debilitating. It is caused by the inhalation of fungal *Coccidioides* spores found in the soil in certain parts of California, including San Benito County. Soil disrupting work can lead to the inhalation of spores if proper precautions are not taken. Valley fever is not transmitted from person to person. Employees’ risk of infection may be decreased by the use of dust control measures and appropriate personal protective equipment while at work. During a 2011–2014 solar project in San Luis Obispo County, at least 44 employees were infected, of which nine were hospitalized, 34 missed work for a median of 22 days, and two developed severe disease that spread to the skin and bones (https://wwwnc.cdc.gov/eid/article/21/11/15-0129_article).

We recommend the following interim steps to prevent Valley fever among employees at this work location. Additional or revised recommendations may be provided at a later date. These recommendations include the following categories:

- Ensuring dust control;
- Ensuring access to personal protective equipment, including protective clothing and respiratory protection;
- Revising or implementing respiratory protection programs and providing additional medical clearances, fit testing, and training as necessary;

OCCUPATIONAL HEALTH BRANCH

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<https://www.cdph.ca.gov/Programs/CCDPHP/DEODC/OHB/Pages/OHB.aspx>



- Ensuring provision of prompt medical evaluation by employer-designated occupational medicine providers to any worker reporting symptoms, without fear of job loss or discrimination; and
- Ensuring provision of training/education and reporting of illness among workers.

Specifically, we recommend that you:

1. Fully implement measures to minimize worker exposure to dust including, but not limited to, stabilizing disturbed soil areas, increasing watering frequency, using soil binders, and covering soil piles.
2. Ensure water truck capacity and rapid response to dusty conditions when needed. When visible dust exceeds 20% opacity on-site, or water trucks cannot sufficiently wet the soil to suppress the dust, move workers out of the area and/or provide additional employee protection. Note that the 20% opacity criteria may not provide sufficient worker protection, as infection may be caused by inhalation of a very low number of spores, e.g., 10 or less.
3. Provide and use HEPA (High Efficiency Particulate Air) filtered, air conditioned, enclosed cabs exclusively on heavy equipment when possible. Verify that cabs are positive in pressure and have HEPA filters on air inlets. Also verify that employees remain inside the cabs with the windows closed, and implement a regular (at least weekly) cleaning schedule for cleaning dust from inside cabs of earth moving equipment. To minimize exposure to dust, use a wet mop, wet wipe, or HEPA-filtered vacuum. In the event that enclosed cabs are not possible, or if windows of the cabs are open for any reason, employees should wear a respirator (see Recommendation #4).
4. Provide National Institute for Occupational Safety and Health (NIOSH)-approved respiratory protection to all employees who work outside (unless they always remain inside a HEPA-filtered, air conditioned, enclosed cab with windows closed). Respirators should be equipped with particulate filters which are designated N95, N100, P100, or HEPA. All employees at the worksite need to be able to immediately put on respirators when conducting or in close proximity to soil-disturbing activities, or when exposed to wind-blown dust. Respiratory protection programs must comply with [Title 8 CCR Section 5144](#), including provision of medical clearance, fit testing, and training.
5. Employees should change out of their work clothes or coveralls and dusty shoes prior to getting into vehicles to go home and shower as soon as possible. We recommend providing coveralls daily to employees who disturb soil.
6. Provide training to staff on methods to prevent Valley fever. You should share this letter with employees who work at or visit the construction site and inform them that cases of Valley fever have likely occurred as a result of employment at the site. We recommend that you provide a copy of our [Preventing Work-Related Coccidioidomycosis \(Valley Fever\) Fact Sheet \(PDF\)](#) and our Outdoor Workers and Valley Fever Fact Sheet,

available in [English \(PDF\)](#) and [Spanish \(PDF\)](#). Contact our office if you would like printed copies. Additional information about occupational Valley fever may be found here: <https://www.cdph.ca.gov/Programs/CCDPHP/DEODC/OHB/Pages/Cocci.aspx>. Additional information in English, Spanish, and Tagalog about Valley fever in general may be found here: <https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/Coccidioidomycosis.aspx>.

7. Ensure that all employees are trained on the need to report to their employer any Valley fever-related symptoms so they may be promptly evaluated by an employer-contracted provider of occupational medicine services. Since employees may fear job loss or discrimination from seeking evaluation through the workers' compensation system, inform them that such retaliation is illegal and will not be tolerated.
8. Ensure that you and your contracted medical providers report Valley fever cases among employees to appropriate agencies.
 - All health care providers, who know of or are taking care of a confirmed or suspected case of Valley fever, must report cases to the local health officer for the jurisdiction where the patient resides. (Title 17 § 2500(b))¹
 - Every employer must immediately² report by telephone or fax to the [local Cal/OSHA district office](#) any serious injury, illness, or death occurring in a place of employment or in connection with any employment. A “serious injury or illness” is defined as one which requires inpatient hospitalization for a period in excess of 24 hours for other than medical observation, or in which an employee suffers a loss of any member of the body or suffers any serious degree of permanent disfigurement ([8 CCR 342](#), [8 CCR330\(h\)](#)).³
 - Every employer must also file a report, “Employer’s Report of Occupational Injury or Illness” (Form 5020) of each occupational Valley fever illness which results in “lost time” or medical treatment beyond first aid. (www.dir.ca.gov/t8/14001.html)
 - All cases of Valley fever must also be listed on the Cal/OSHA Form 300, “Log of Work-Related Injuries and Illnesses”.

Although we are sending this letter to all employers and union representatives known to CDPH and the San Benito County Health Department to be connected to the Panoche Valley Solar Project, we might not have a complete list of all employers. Therefore, we request that you distribute this letter to all subcontractors, union representatives, and contracted health care providers. We also recommend that all subcontractors distribute this letter to their subcontractors and union stewards, if any. If some employers are unprepared to implement these protective measures, we recommend that their work be postponed until these measures can be implemented to prevent additional illnesses from occurring.

Any questions regarding these recommendations should be directed to me at (510) 620-5730 or barbara.materna@cdph.ca.gov.

Sincerely,



Barbara Materna, Ph.D., CIH, Chief
Occupational Health Branch, CDPH

cc: See next page.

¹ Health care providers should send Confidential Morbidity Reports (<https://www.cdph.ca.gov/CDPH%20Document%20Library/ControlledForms/cdph110a.pdf>) to the jurisdiction where the patient resides. For San Benito County, this would be the following:

San Benito County Public Health Division
439 Fourth Street
Hollister, CA 95023
Phone: (831) 637-5367
Fax: (831) 637-9073

² “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 a 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. ([8 CCR 342](#))

³ This does not include an injury, illness, or death caused by commission of a Penal Code violation (except a violation of PC Section 385), or an accident on a public street or highway.

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