



Via email (Bruce.Fletcher@state.ma.us)

August 14, 2020

Mr. Bruce Fletcher  
Industrial Health and Safety Inspector II  
MA Department of Labor Standards  
Workplace Safety & Health Program for Public Employees  
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Office 617-626-5560  
Bruce.fletcher@mass.gov  
www.mass.gov/dols/wshp

**Re: RESPONSE TO NOTICE OF WARNING AND ORDER TO CORRECT FOR NON-COMPLIANCE WITH COVID19 SAFETY STANDARDS DLS FILE # 21C-10115**

Dear Mr. Fletcher,

In response to the DLS FILE # 21C-10115, Cumberland Farms, Inc. is prepared to take the following corrective actions:

- Convert all remaining Cumberland Farms beverage stations that are currently self-serve to full-serve using the protocol as described in the document Full Service Coffee Program which is enclosed herewith as Attachment 1. This protocol has been readily accepted by numerous Boards of Health representing Massachusetts towns and cities.

Execution of the corrective action described above will be completed by **August 21, 2020**.

At your earliest convenience, kindly confirm receipt of this correspondence, together with the referenced attachment. I look forward to continuing to work with you in resolving these matters prior to the next follow-up public health inspections.

Sincerely yours,

CUMBERLAND FARMS, INC.

A handwritten signature in blue ink, appearing to read "Jeremy Zenlea".

Jeremy Zenlea  
Director, Food Safety

Enc.



**Cumberland Farms, Inc.**  
165 Flanders Road, Westborough, MA 01581  
508-270-1400  
www.cumberlandfarms.com



cc: Mr. Unkovic, SVP and General Counsel  
Mr. Hill. SVP Operations



Attachment 1: Full Service Coffee Program

Full Service Coffee Program	
<b>Purpose</b>	To provide Team Members procedures and safety guidelines for full service coffee in locations that are not allowed to offer self-service dispensed beverages.
<b>Details</b>	<ul style="list-style-type: none"> <li>*This program will be provided to EG America Stores where a ban has been enacted for self-serve dispensed beverages.</li> <li>*The execution of this program in any EG America Stores will be communicated through the Operations chain of command.</li> </ul>
<b>Setting up</b>  	<ul style="list-style-type: none"> <li>*Your coffee/beverage area needs to be "blocked off" using the signs provided by advertising.</li> <li>*An "Order Here" area will need to be identified for taking Guests beverage orders.</li> <li>*A "Pick Up Area" will need to be identified for placing finished beverages for Guests to take their order.</li> <li>*The guest side of the coffee island/area that is not blocked off, should be set up with single use sugar, sweeteners and creamers.</li> </ul> <p>NOTE: Keep the stirrers and straws behind the full service area. These will be provided to the guests when placing the product in the pick-up area.</p> 
<b>Cleaning and Sanitizing Prior to Starting and During Serving</b>	<ul style="list-style-type: none"> <li>*The entire dispensed beverage area must be cleaned and sanitized using the "Enhanced Cleaning and Sanitizing" instructions.</li> <li>*At least once per hour it is mandatory to clean and sanitize the dispensed beverage area.</li> <li>*A checklist will be provided for tracking the cleaning and sanitizing of the area during service.</li> </ul>
<b>Clean Hands and Gloves</b>	<ul style="list-style-type: none"> <li>*Prior to touching anything in the dispensed beverage area, or taking any Guest orders, Team Members MUST wash their hands and put on clean gloves.</li> <li>*Hands MUST be rewashed and gloves changed: <ul style="list-style-type: none"> <li>-IF a Team Member has made contact with a Guest or any items/surfaces outside of the blocked dispensed beverage area.</li> <li>-Prior to coming into the dispensed beverage area if the Team Member had to leave for any reason.</li> <li>-IF a Team Members gloves have become soiled or ripped.</li> <li>-Immediately after completing a cleaning and sanitizing of the beverage area.</li> </ul> </li> </ul>
<b>Step 1</b>	*Ask the Guest which dispensed beverage they would like: Hot Coffee, Iced Coffee, Cappuccino, Fountain Soda, Frozen Beverage, etc....
<b>Step 2</b>	*Ask the Guest what size they would like.
<b>Step 3</b>	*Fill the cup with the product.
<b>Step 4</b>	*Securely place the lid on the beverage.
<b>Step 5</b>	<ul style="list-style-type: none"> <li>*Place the beverage, with the straw/stirrer onto the designated "Pick Up" area and direct them to the creamers and sweeteners for the guest to add to their own beverages.</li> </ul> 