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# COVID-19 EXPOSURE PREVENTION, PREPAREDNESS, AND RESPONSE PLAN

April 29, 2020



**Contractors and Engineers**



## **COVID-19 EXPOSURE PREVENTION, PREPAREDNESS, AND RESPONSE PLAN**

APG takes the health and safety of our employees very seriously. With the spread of the coronavirus or COVID-19, a respiratory disease caused by the SARS-CoV-2 virus, APG must remain vigilant in mitigating the outbreak. We are a proud part of the construction industry, which has been deemed essential during this Declared National Emergency. In order to be safe and maintain operations, we have developed this COVID-19 Exposure Prevention, Preparedness, and Response Plan to be implemented, to the extent feasible and appropriate, throughout APG and at all of our jobsites.

This plan is based on information available from the CDC and OSHA at the time of its development, and is subject to change based on further information provided by the CDC, OSHA, and other public officials. APG may also amend this plan based on operational needs.

We will comply with Owner's and General Contractor's specific COVID-19 related PPE or health requirements which may not be included in this plan.

### **Responsibilities of Managers and Supervisors**

All managers and supervisors must be familiar with this plan and ready to answer questions from employees. Managers and supervisors must set a good example by following this plan at all times. This involves practicing good personal hygiene and jobsite safety practices to prevent the spread of the virus. Managers and supervisors must encourage this same behavior from all employees.

### **Responsibilities of Employees**

APG is asking every one of our employees to help with our prevention efforts while at work. In order to minimize the spread of COVID-19 at our jobsites, everyone must do their part. As set forth below, APG has instituted various housekeeping, social distancing, and other best practices at our jobsites and our offices. All employees must follow these. In addition, employees are expected to report to their managers or supervisors if they are experiencing signs or symptoms of COVID-19, as described below. If you have a specific question about this plan or COVID-19, please ask your manager or supervisor. If they cannot answer the question, please contact Safety Director Sean Hendry.

OSHA and the CDC have provided the following control and preventative guidance for all workers, regardless of exposure risk:

- Frequently wash your hands with soap and water for at least 20 seconds. When soap and running water are unavailable, use an alcohol-based hand rub with at least 60% alcohol.
- Avoid touching your eyes, nose, or mouth with unwashed hands.
- Follow appropriate respiratory etiquette, which includes covering for coughs and sneezes.
- Avoid close contact with people who are sick.

The CDC defines a close contact as anyone who has been within 6 feet of a person infected with the virus for a prolonged period of time, or has had direct contact with the infected person's secretions. This could

also include work colleagues. Ensure the social distancing rule of 6 feet if at all possible. When it is not possible, ensure that you are wearing a protective covering over your mouth and nose.

In addition, employees must familiarize themselves with the symptoms of COVID-19, which include the following:

- Coughing
- Fever
- Shortness of breath and/or difficulty breathing
- Chills, body aches, sore throat, headache, diarrhea, nausea/vomiting, runny nose

If you develop a fever and symptoms of respiratory illness, such as a cough or shortness of breath, **DO NOT GO TO WORK** and call your supervisor and healthcare provider right away. Likewise, if you come into close contact with someone showing these symptoms, call your supervisor and healthcare provider right away.

### **Job Site and Office Protective Measures**

APG Electric has instituted the following protective measures at all jobsites.

#### A. General Safety Policies and Rules

- Any employee/contractor/visitor showing symptoms of COVID-19 will be asked to leave the jobsite and return home.
- Work attendance along with pre-task and weekly safety stand downs will be done verbally to avoid common area contact at sign-in sheets. Employees will keep a distance of 6 feet apart or be wearing face masks.
- Employees must avoid physical contact with others and shall direct others (co-workers/contractors/visitors) to increase personal space to at least 6 feet, where possible. Where work trailers are used, only necessary employees should enter the trailers and all employees should maintain social distancing while inside the trailers.
- All in-person meetings will be limited. To the extent possible, meetings will be conducted by telephone or conference platform (ZOOM).
- APG understands that due to the nature of our work, access to running water for hand washing may be impracticable at times. In these situations, APG will provide, if available, alcohol-based hand sanitizers. Please note that APG is utilizing every resource available to obtain all PPE related to COVID-19.
- Employees should limit the use of co-workers' tools and equipment. To the extent tools must be shared, clean tools before and after use. When cleaning tools and equipment, consult manufacturing recommendations for proper cleaning techniques and restrictions.
- Employees are encouraged to limit the need for N95 respirator use, by using engineering and work practice controls to minimize dust. Such controls include the use of water delivery and dust collection systems, as well as limiting exposure time.

- Employees are encouraged to minimize ride-sharing. While in vehicles, employees must ensure adequate ventilation. If at all possible, minimize number of employees inside transportation vans to comply with social distancing. If this is not possible, please ensure that all employees are wearing a face covering at all times while in the van.
- If practicable, only one employee should drive the same truck or use the same piece of equipment every shift (not sharing it with others). If this is not possible, ensure that the piece of equipment is disinfected when you are finished with it.
- In lieu of using a common source of drinking water, such as a cooler, employees should use individual water bottles.

#### B. Workers Entering Occupied Medical and Office Buildings

- Construction and maintenance activities within occupied medical or office buildings and other establishments, present unique hazards with regards to COVID-19 exposure. Everyone working within such establishments should evaluate the specific hazards when determining best practices related to COVID-19.
- During this work, employees must sanitize the work areas upon arrival, throughout the workday, and immediately before departure.
- Employees should ask other occupants to keep a personal distance of 6 feet at a minimum. Workers should wash or sanitize hands immediately before starting and after completing the work.

#### C. Job Site Visitors

- The number of visitors to the job site, including the trailer or office, will be limited to only those necessary for the work.
- All visitors will be screened in advance of arriving on the job site and/or office. If the visitor answers "YES" to any of the following questions, he/she should not be permitted to access the jobsite and/or office:
  - Have you been confirmed positive for COVID-19?
  - Are you currently experiencing, or have you recently experienced, any acute respiratory illness symptoms such as fever, cough, or shortness of breath?
  - Have you been in close contact with any person who has been confirmed positive for COVID-19?
  - Have you been in close contact with any persons who have traveled and are also exhibiting acute respiratory illness symptoms?
- Site deliveries will be permitted but should be properly coordinated in line with the employer's minimal contact and cleaning protocols. Delivery personnel should remain in their vehicles if at all possible.

#### D. Personal Protective Equipment and Work Practice Controls

- In addition to regular PPE for workers engaged in various tasks (fall protection, hard hats, hearing protection), APG will also provide:

- Gloves. Employees should avoid sharing gloves. Dispose of nitrile or latex gloves immediately after each use.
- Eye protection should be worn at all times while on site.
- APG will provide face coverings for its employees. The type of coverings shall include gaiters, face masks, surgical masks and/or dust particulate masks.  
NOTE: The CDC is currently recommending some sort of face covering to be used. The CDC is however not recommending that healthy people wear N95 respirators to prevent the spread of COVID-19. N95 respirators are used by first responders and medical professionals overseeing patients who have tested positive for COVID-19 and/or potentially infected COVID-19 patients. The N95 masks will be reserved for such tasks that require particulate filtration.
- The Following Work Practice Controls should be followed:
  - Keep dust down by using engineering and work practice controls, specifically through the use of water delivery and dust collection systems.
  - Limit exposure time to the extent practicable.
  - Isolate workers in dusty operations by using a containment structure or distance to limit dust exposure to those employees who are conducting the tasks, thereby protecting nonessential workers and bystanders.
- Institute a rigorous housekeeping program to reduce dust levels on the jobsite.

### **Job Site and Office Cleaning and Disinfecting**

APG has instituted regular housekeeping practices, which include cleaning and disinfecting frequently used tools and equipment and other elements of the work environment, where possible. Employees should regularly do the same in their assigned work areas. It is the responsibility of the Project Manager, the General Superintendent's Frontline Supervisor, and/or the Safety Team member to ensure that all of the following are adhered to:

- Job site trailers and break/lunchroom areas will be cleaned at least once per day. Employees performing cleaning will be issued proper personal protective equipment (PPE), such as nitrile, latex, or vinyl gloves and gowns, as recommended by the CDC.
- Any trash collected from the jobsite must be changed frequently by someone wearing nitrile, latex, or vinyl gloves.
- Any portable job site toilets (the responsibility of the General Contractor in most cases) should be cleaned by the leasing company at least twice per week and disinfected on the inside. The General Contractor must ensure soap stations and cleaning water are readily available in these areas as well.
- APG will ensure that internal office wall-mounted foaming hand sanitizer dispensers and/or individual sanitizers provided to our employees are always filled. Frequently touched items (i.e. door pulls and toilet seats) will be disinfected frequently.
- Vehicles and equipment/tools should be cleaned at least once per day and before a change in operator, rider, and/or user.
- OSHA has indicated that a reliable report that an employee has tested positive for COVID-19 does not typically require an employer to perform special cleaning or decontamination of

work environments, unless those environments are visibly contaminated with blood or other bodily fluids.

- APG will ensure that all disinfection will be conducted using one of the following:
  - Common EPA-registered household disinfectant;
  - Alcohol solution with at least 60% alcohol; or
  - Diluted household bleach solutions (if appropriate for the surface).
- APG will maintain Safety Data Sheets of all disinfectants used on site.
- Shared offices or work spaces should be cleaned when you are finished for the day in that area.
- All office break rooms will be cleaned on a regular basis each day.

**Note:** Additional cleaning requirements may be appropriate if hazardous materials are used on site.

### **Exposure Situation**

If an employee has tested positive for COVID-19, APG will conduct an investigation to find co-workers who may have had close contact with the confirmed positive employee in the prior 14 days. We will direct those individuals to self-quarantine for 14 days from the last date of close contact with the confirmed positive employee. If applicable, APG will also notify any sub-contractors, vendors/suppliers, or visitors who may have had close contact with the confirmed positive employee. If an employee learns that he or she has come into close contact with a confirmed positive individual outside of the workplace, he/she must alert a manager or supervisor of the close contact and self-quarantine for 14 days from the last date of close contact with that individual.

Please contact Safety Director Sean Hendry with any questions regarding exposure situations.

### **OSHA Recordkeeping**

If a confirmed case of COVID-19 is reported, APG will determine if it meets the criteria for recordable and reportable under OSHA's recordkeeping rule. OSHA requires construction employers to record work-related injuries and illnesses that meet certain severity criteria on the OSHA 300 Log, as well as complete the OSHA Form 301 (or equivalent) upon the occurrence of these injuries. For purposes of COVID-19, OSHA also requires employers to report to OSHA any work-related illness that (1) results in a fatality, or (2) results in the in-patient hospitalization of one or more employees. In-patient hospitalization is defined as a formal admission to the in-patient service of a hospital or clinic for care or treatment.

OSHA has made a determination that COVID-19 should not be excluded from coverage of the rule – like the common cold or the seasonal flu – and, thus, OSHA is considering it an illness. However, OSHA has stated that only confirmed cases of COVID-19 should be considered an illness under the rule. Thus, if an employee simply comes to work with symptoms consistent with COVID-19 but is not a confirmed diagnosis, the recordable analysis is not necessarily triggered at that time.

If an employee has a confirmed case of COVID-19, APG will conduct an assessment of any workplace exposures to determine if the case is work-related. Work-relatedness is presumed for illnesses that result

from events or exposures in the work environment, unless it meets certain exceptions. One of those exceptions is that the illness involves signs or symptoms that surface at work but result solely from a non-work related event or exposure that occurs outside of the work environment. Thus, if an employee develops COVID-19 solely from an exposure outside of the work environment, it would not be work-related, and thus not recordable.

APG's assessment will consider the work environment itself, the type of work performed, the risk of person-to-person transmission given the work environment, and other factors such as community spread. Further, if an employee has a confirmed case of COVID-19 that is considered work-related, APG will report the case to OSHA if it results in a fatality within 30 days or an in-patient hospitalization within 24-hours of the exposure incident.

### **Confidentiality/Privacy**

Except for circumstances in which APG is legally required to report workplace occurrences of communicable disease, the confidentiality of all medical conditions will be maintained in accordance with applicable law and to the extent practical under the circumstances. When it is required, the number of persons who will be informed that an unnamed employee has tested positive will be kept to the minimum needed to comply with reporting requirements and to limit the potential for transmission to others. APG reserves the right to inform other employees that an unnamed co-worker has been diagnosed with COVID-19 if the other employees might have been exposed to the disease so the employees may take measures to protect their own health. APG also reserves the right to inform sub-contractors, vendors/suppliers, or visitors that an unnamed employee has been diagnosed with COVID-19 if they might have been exposed to the disease so those individuals may take measures to protect their own health.

### **General Questions**

Given the fast developing nature of the COVID-19 outbreak, APG may modify this plan on a case-by-case basis. If you have any questions concerning this plan, please contact Safety Director Sean Hendry at (727) 243-3090.