

Construction Industry Safety Coalition Recommendations:

COVID-19 Exposure Prevention, Preparedness, and Response Plan for Construction

D9 Systems, Inc. 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, we all must remain vigilant in mitigating the outbreak. This is particularly true for the construction industry, which has been deemed “essential” in many locations throughout the United States during this Declared National Emergency. To be safe and maintain operations, we have developed this COVID-19 Exposure Prevention, Preparedness, and Response Plan to be implemented throughout the Company and at all jobsites. We have also identified a team of employees to monitor available U.S. Center for Disease Control and Prevention (“CDC”) and Occupational Safety and Health Administration (“OSHA”) guidance on the virus.

This Plan is based on currently available information from the CDC and OSHA and is subject to change based on further information provided by the CDC, OSHA, and other public officials. The Company may also amend this Plan based on operational needs.

I. Responsibilities of Managers and Supervisors

All managers and supervisors must be familiar with this Plan and be 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.

II. Responsibilities of Employees

We are asking every one of our employees to help with our prevention efforts while at work. To minimize the spread of COVID-19 at our jobsites, we all must play our part. As set forth below, the Company has instituted various housekeeping, social distancing, and other best practices at our jobsites. 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.

OSHA and the CDC have provided the following control and preventative guidance to 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.

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

- Coughing;
- Fever of 100.4 degrees Fahrenheit or higher;
- Shortness of breath, difficulty breathing; and
- Early symptoms such as chills, body aches, sore throat, headache, diarrhea, nausea/vomiting, and runny nose.

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

III. Job Site Protective Measures

The Company 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. D9 Systems, Inc. may determine that taking employee/contractor/visitor temperatures at worksites is appropriate and restrict access based upon temperature readings. As an alternative to taking temperatures

at the worksite, D9 Systems, Inc. may request employees/contractors/visitors to take their own temperatures prior to coming to the worksite. (See Appendix A for additional information.)

- Safety meetings will be by telephone, if possible. If safety meetings are conducted in-person, attendance will be collected verbally, and the foreman/superintendent will sign-in each attendee. Attendance will not be tracked through passed-around sign-in sheets or mobile devices. During any in-person safety meetings, avoid gathering in groups of more than 10 people and participants must remain at least six (6) feet apart.
- Employees must avoid physical contact with others and direct employees/contractors/visitors to increase personal space to at least six (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.
- Employees will be encouraged to stagger breaks and lunches, if practicable, to reduce the size of any group at any one time to less than ten (10) people.
- The Company understands that due to the nature of our work, access to running water for hand washing may be impracticable. In these situations, the Company will provide, if available, alcohol-based hand sanitizers and/or wipes.
- Employees should limit the use of co-workers' tools and equipment. To the extent tools must be shared, the Company will provide alcohol-based wipes to 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.
- The Company will divide crews/staff into two (2) groups where possible so that projects can continue working effectively if one of the divided teams is required to quarantine.
- As part of the division of crews/staff, the Company will designate employees into dedicated shifts, at which point, employees will remain with their dedicated shift for the remainder of the project. If there is a legitimate reason for an employee to change shifts, the Company will have sole discretion in making that alteration.

- Employees are encouraged to minimize ride-sharing. While in vehicle, employees must ensure adequate ventilation and consider the use of face coverings.
- If practicable, employees should use/drive the same truck or piece of equipment every shift.
- In lieu of using a common source of drinking water, such as a cooler, employees should use individual water bottles. Use of tobacco products (chewing tobacco, smoking), vaping, sunflower seeds, etc., should be avoided.

B. Workers entering Occupied Building and Homes

- When employees perform construction and maintenance activities within occupied homes, office buildings, and other establishments, these work locations present unique hazards with regards to COVID-19 exposures. All such workers 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. The Company will provide alcohol-based wipes for this purpose.
- Employees should ask other occupants to keep a personal distance of six (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. If the visitor answers “yes” to any of the following questions, he/she should not be permitted to access the jobsite:
 - Have you been confirmed positive for COVID-19?
 - Are you currently experiencing, or recently experienced, any acute respiratory illness symptoms such as fever, cough, or shortness of breath?
 - Have you been in close contact with any persons who have been confirmed positive for COVID-19 and are also exhibiting acute respiratory illness symptoms?

- Have you been in close contact with any persons who have traveled and are also exhibiting acute respiratory illness symptoms?
- D9 Systems, Inc. may determine that taking visitor temperatures at worksites is appropriate and restricting access based upon temperature readings. As an alternative to taking temperatures at the worksite, D9 Systems, Inc. may request visitors take their own temperatures prior to coming to the worksite. (See Appendix A for more information.)
- 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 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), employers will also provide:
 - Gloves: Gloves should be worn at all times while on-site. The type of glove worn should be appropriate to the task. If gloves are not typically required for the task, then any type of glove is acceptable, including latex gloves. Employees should avoid sharing gloves.
 - Eye protection: Eye protection should be worn at all times while on-site.
 - **NOTE:** The CDC is currently not recommending that healthy people wear N95 respirators to prevent the spread of COVID-19. Employees should wear N95 respirators if required by the work and if available.
- Due to the current shortage of N95 respirators, 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.

- To the extent that shortages of N95 respirators continue to occur, the Company will take the following steps in accordance with OSHA guidance to continue to protect employees where respirator use is required by other OSHA standards:
 - *Extended use or reuse of N95s* – If extended use or reuse of N95 respirators becomes necessary, the same employee is permitted to extend use of or reuse the respirator, as long as the respirator maintains its structural and functional integrity and the filter material is not physically damaged, soiled, or contaminated.
 - *Use of expired N95s* – If N95s are not available and extended use or reuse of N95s is not possible, employees may use previously NIOSH-certified *expired* N95s.
 - *Non-NIOSH approved respirators* – If N95s are not available, extended use or reuse of N95s is not possible, and expired N95s are not available, employees may use respirators that are either certified under certain standards of other countries; or previously certified under the standards of other countries but beyond their manufacturer’s recommended shelf life. OSHA directs that respirators certified by the People’s Republic of China be used only after respirators from other countries are sought.

E. Face Coverings

D9 Systems, Inc. has reviewed OSHA’s workplace classification scheme for worker exposure potential to COVID-19. While construction work could generally be considered “low risk” for viral transmission, some construction tasks or activities may involve working with others in proximity closer than six feet, including sitting in the same vehicle, and therefore might be considered as “medium risk” under the Agency’s risk pyramid.

Due to this and CDC recommendations, we are implementing a face covering policy for certain work activities for the foreseeable future, including those situations where (1) it is mandated by state or local rule, or (2) employees must work in proximity of six (6) feet from other employees. A face covering is a cloth, bandana, or other type of material that covers a person’s nose and mouth. The CDC lists five criteria for “cloth face coverings”: the face covering should:

- fit snugly but comfortably against the side of the face;
- be secured with ties or ear loops;
- include multiple layers of fabric;
- allow for breathing without restriction; and
- be able to be laundered and machine-dried without damage or change to shape.

Use of a face covering is not a substitute for other workplace preventative techniques that are outlined in this Plan.

IV. Job Site Cleaning and Disinfecting

The Company has instituted regular housekeeping practices, which includes 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.

- Any trash collected from the jobsite must be changed frequently by someone wearing nitrile, latex, or vinyl gloves.
- Vehicles and equipment/tools should be cleaned at least once per day and before change in operator or rider.
- The Company will ensure that any disinfection shall be conducted using one of the following:
 - Common EPA-registered household disinfectant;
 - Alcohol solution with at least 60% alcohol; or
 - Diluted household bleach solutions (these can be used if appropriate for the surface).
- The Company will maintain Safety Data Sheets of all disinfectants used on site.

V. Jobsite Exposure Situations

- **Employee Exhibiting COVID-19 Symptoms**

If an employee exhibits COVID-19 symptoms, the employee must remain at home until he or she is symptom free for 72 hours (3 full days) without the use of fever-reducing or other symptom-altering medicines (e.g., cough suppressants). The Company will similarly require an employee that reports to work with symptoms to return home until they are symptom free for 72 hour (3 full days). To the extent practical, employees are required to obtain a doctor's note clearing them to return to work.

- **Employee Tests Positive for COVID-19**

An employee that tests positive for COVID-19 will be directed to self-quarantine away from work. Employees that test positive and are symptom free may return to work when at least seven (7) days have passed since the date of his or her first positive test, and have not had a subsequent illness. Employees that test positive and are directed to care for themselves at home may return to work when: (1) at least 72 hours (3 full days) have passed since recovery;¹ and (2) at least seven (7) days have passed since symptoms first appeared. Employees that test positive and have been hospitalized may return to work when directed to do so by their medical care provider. The Company will require an employee to provide documentation clearing their return to work.

- **Employee Has Close Contact with a Tested Positive COVID-19 Individual**

Employees that have come into close contact with a confirmed-positive COVID-19 individual (co-worker or otherwise), will be directed to either: (1) continue to work, provided they remain asymptomatic in accordance with Section III above; or, if they are symptomatic or the Company chooses to follow more conservative protocols, (2) self-quarantine for 14 days from the last date of close contact with the carrier. Close contact is defined as six (6) feet for a prolonged period of time.

If the Company learns that an employee has tested positive, the Company will conduct an investigation into co-workers that may have had close contact with the confirmed-positive employee in the prior 14 days and direct those individuals that have had close contact with the confirmed-positive employee to either continue to work, provided they remain asymptomatic in accordance with Section III above, or, if they are symptomatic or the Company chooses to follow more conservative protocols, to self-quarantine for 14 days from the last date of close contact with the carrier. 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.

VI. OSHA Recordkeeping

For purposes of recording cases of COVID-19, the Company is responsible for recording a case, if:

- The case is a tested-positive confirmed case of COVID-19, as defined by the CDC; and

¹ Recovery is defined as: (1) resolution of fever without the use of fever-reducing medications; and (2) improvement in respiratory symptoms (e.g., cough, shortness of breath).

- The case is “work-related,” which is defined as an event or exposure that either caused or contributed to the resulting condition or significantly aggravated a pre-existing injury or illness; and
- The case involves one or more of the following:
 - Death;
 - Days away from work;
 - Restricted work or transfer to another job;
 - Medical treatment beyond first aid;
 - Loss of consciousness; and
 - A significant injury or illness diagnosed by a physician or other licensed health care professional, even if it does not result in death, days away from work, restricted work or job transfer, medical treatment beyond first aid, or loss of consciousness.

However, per OSHA recent guidance, the Company will consider a COVID-19 positive case to be work-related only where:

- There is objective evidence that a COVID-19 case may be work-related. For example, a number of cases developing among workers who work closely together without an alternative explanation; and
- The evidence was reasonably available to the Company. For example, the Company was given information by employees or the Company learns of information regarding employees’ health and safety in the ordinary course of business.

For purposes of reporting the case to OSHA, the Company will report any work-related confirmed cases if they result in a fatality within 30 days or an in-patient hospitalization within 24-hours of the exposure incident occurring.

VII. Confidentiality/Privacy

Except for circumstances in which the Company 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 of an employee's condition will be kept at the minimum needed not only to comply with legally-required reporting, but also to assure proper care of the employee and to detect situations where the potential for transmission may increase. A sample notice to employees is attached to this Plan. The Company reserves the right to inform other employees that a co-worker (without disclosing the person's name) 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.

VIII. General Questions

Given the fast-developing nature of the COVID-19 outbreak, the Company may modify this Plan on a case by case basis. If you have any questions concerning this Plan, please contact Your supervisor.

Employee Notification

DATE: [DATE]
TO: [CLOSE CONTACT EMPLOYEE]
FROM: Bill Gibson

We have been informed by one of our [employees/customer/vendor/etc] working at [JOBSITE] that he/she has a confirmed case of COVID-19, commonly known as “Coronavirus,” based on test results obtained on [DATE]. Per company policy, this [EMPLOYEE/CUSTOMER/VENDOR] has been directed to self-quarantine until permitted to return to work.

We are alerting you to this development because, based on the Company’s investigation, we believe that you may have come into contact with the confirmed-positive case, on or about [DATE]. D9 Systems, Inc. will permit you to work provided you remain asymptomatic. In addition, we are implementing the following practices:

- Measuring temperature of employees before they enter the worksite;
- Regularly monitoring asymptomatic employees;
- Ensuring employees maintain social distancing as work duties permit; and
- Routinely disinfecting workspaces.

You are also required to wear a face covering at all times while at the worksite for at least 14 days. Please inform D9 Systems, Inc. if any of the following occur to you during the next 14 days: you experience flu-like symptoms, including fever, cough, sneezing, or sore throat; or you test positive for COVID-19.

We also want to take this opportunity to remind you that one of our core values as a company is respect for and among our employees. We will treat information regarding the identity of employees with suspected or confirmed cases of COVID-19 as confidential to the extent practicable and will comply with applicable laws regarding the handling of such information. Further, per Company policy, we will not tolerate harassment of, or discrimination or retaliation against employees.

Please contact Bill Gibson if you have any questions or concerns.

For more information about COVID-19, please visit the CDC website at: <http://www.cdc.gov/coronavirus/2019-ncov/index.html>

COVID-19 Checklist for Employers and Employees

Know the Symptoms of COVID-19

- Coughing, fever, shortness of breath, and difficulty breathing.
- Early symptoms may include chills, body aches, sore throat, headache, diarrhea, nausea/vomiting, and runny nose. If you develop a fever and symptoms of respiratory illness, DO NOT GO TO WORK and call your health-care provider immediately. Do the same thing if you come into close contact with someone showing these symptoms.

Employer Responsibilities

- Develop a COVID-19 Exposure Action Plan.
- Conduct safety meetings (toolbox talks) by phone if possible. If not, instruct employees to maintain 6-feet between each other. The foreman/supervisor will track attendance verbally rather than having employees sign an attendance sheet.
- Access to the job site and work trailer will be limited to only those necessary for the work.
- All visitors will be pre-screened to ensure they are not exhibiting symptoms.
- Employees, contractors, and visitors will be asked to leave the jobsite and return home if they are showing symptoms.
- Provide hand sanitizer and maintain Safety Data Sheets of all disinfectants used on site.
- Provide protective equipment (PPE) to any employees assigned cleaning/disinfecting tasks.
- Talk with business partners about your response plans. Share best practices with other businesses in your communities (especially those in your supply chain), chambers of commerce, and associations to improve community response efforts.

Employee Responsibilities

- Become familiar with the Exposure Action Plan and follow all elements of the Plan.
- Practice good hygiene: wash hands with soap and water for at least 20 seconds. If these are not available, use alcohol-based hand rub with at least 60% alcohol. Avoid touching your face, eyes, food, etc. with unwashed hands.

Cleaning/Disinfecting Job Sites and Other Protective Measures

- Clean and disinfect frequently used tools and equipment on a regular basis. This includes other elements of the jobsite where possible. Employees should regularly do the same in their assigned work areas.
- Clean shared spaces such as trailers and break/lunchrooms at least once per day.
- Disinfect shared surfaces (door handles, machinery controls, etc.) on a regular basis.
- Avoid sharing tools with co-workers. If not, disinfect before and after each use.
- Arrange for any portable job site toilets be cleaned by the leasing company at least twice per week and disinfected on the inside.
- Trash collected from the jobsite must be changed frequently by someone wearing gloves.

Personal Protective Equipment and Alternate Work Practice Controls

- Provide and wear the proper PPE.
- Keep the dust down by using engineering and work practice controls, specifically through the use of water delivery and dust collection systems.

COVID-19 Toolbox Talk

What is COVID-19?

The novel coronavirus, COVID-19 is one of seven types of known human coronaviruses. COVID-19, like the MERS and SARS coronaviruses, likely evolved from a virus previously found in animals. The remaining known coronaviruses cause a significant percentage of colds in adults and children, and these are not a serious threat for otherwise healthy adults.

Patients with confirmed COVID-19 infection have reportedly had mild to severe respiratory illness with symptoms such as fever, cough, and shortness of breath.

According to the U.S. Department of Health and Human Services/Centers for Disease Control and Prevention (“CDC”), Chinese authorities identified an outbreak caused by a novel—or new—coronavirus. The virus can cause mild to severe respiratory illness. The outbreak began in Wuhan, Hubei Province, China, and has spread to a growing number of other countries—including the United States.

How is COVID-19 Spread?

COVID-19, like other viruses, can spread between people. Infected people can spread COVID-19 through their respiratory secretions, especially when they cough or sneeze. According to the CDC, spread from person-to-person is most likely among close contacts (about 6 feet). Person-to-person spread is thought to occur mainly *via* respiratory droplets produced when an infected person coughs or sneezes, like how influenza and other respiratory pathogens spread. These droplets can land in the mouths or noses of people who are nearby or possibly be inhaled into the lungs. It is currently unclear if a person can get COVID-19 by touching a surface or object that has the virus on it and then touching their own mouth, nose, or possibly their eyes.

In assessing potential hazards, employers should consider whether their workers may encounter someone infected with COVID-19 in the course of their duties. Employers should also determine if workers could be exposed to environments (e.g., worksites) or materials (e.g., laboratory samples, waste) contaminated with the virus.

Depending on the work setting, employers may also rely on identification of sick individuals who have signs, symptoms, and/or a history of travel to COVID-19-affected areas that indicate potential infection with the virus, in order to help identify exposure risks for workers and implement appropriate control measures.

There is much more to learn about the transmissibility, severity, and other features associated with COVID-19, and investigations are ongoing.

COVID-19 Prevention and Work Practice Controls:

Worker Responsibilities

- 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. Always wash hands that are visibly soiled.
- Cover your mouth and nose with a tissue when you cough or sneeze or use the inside of your elbow.
- Avoid touching your eyes, nose, or mouth with unwashed hands.
- Avoid close contact with people who are sick.
- Employees who have symptoms (i.e., fever, cough, or shortness of breath) should notify their supervisor and stay home—DO NOT GO TO WORK.
- Sick employees should follow [CDC-recommended steps](#). Employees should not return to work until the criteria to [discontinue home isolation](#) are met, in consultation with healthcare providers and state and local health departments.

General Job Site / Office Practices

- Clean AND disinfect frequently touched objects and surfaces such as workstations, keyboards, telephones, handrails, and doorknobs. Dirty surfaces can be cleaned with soap and water prior to disinfection. To disinfect, use [products that meet EPA's criteria for use against SARS-CoV-2external icon](#), the cause of COVID-19, and are appropriate for the surface.
- Avoid using other employees' phones, desks, offices, or other work tools and equipment, when possible. If necessary, clean and disinfect them before and after use.
- Clean and disinfect frequently used tools and equipment on a regular basis.
 - This includes other elements of the jobsite where possible.
 - Employees should regularly do the same in their assigned work areas.
- Clean shared spaces such as trailers and break/lunchrooms at least once per day.
- Disinfect shared surfaces (door handles, machinery controls, etc.) on a regular basis.
- Avoid sharing tools with co-workers if it can be avoided. If not, disinfect before and after each use.
- Arrange for any portable job site toilets to be cleaned by the leasing company at least twice per week and disinfected on the inside.
- Any trash collected from the jobsite must be changed frequently by someone wearing gloves.
- In addition to regular PPE for workers engaged in various tasks (fall protection, hard hats, hearing protection), employers will also provide:
 - Gloves: Gloves should be worn at all times while on-site. The type of glove worn should be appropriate to the task. If gloves are not typically required for the task, then any type of glove is acceptable, including latex gloves. Gloves should not be shared if at all possible.
 - Eye protection: Eye protection should be worn at all times while on-site.

- Some employees may be required to wear face coverings, including in those situations where (1) it is mandated by state or local rule, or (2) employees must work in proximity of six (6) feet from other employees. A face covering is a cloth, bandana, or other type of material that covers a person's nose and mouth. The CDC lists five criteria for "cloth face coverings": the face covering should: fit snugly but comfortably against the side of the face; be secured with ties or ear loops; include multiple layers of fabric; allow for breathing without restriction; and be able to be laundered and machine-dried without damage or change to shape. Use of a face covering is not a substitute for other workplace preventative techniques that are outlined in this Plan.