



COVID-19 EXPOSURE PLAN

1.0 INTRODUCTION

Coronavirus Disease 2019 (COVID-19) is a respiratory disease caused by the SARS-CoV-2 virus. This document focuses on what John E. Green Company (JEG) management, supervisors, employees, and subcontractors need to do to implement engineering, administrative and work practice controls, and personal protective equipment (PPE). All JEG employees should use this document to help identify risk levels on projects and to determine any appropriate control measures to implement. The guidance for this document was supplied by OSHA regulations and CDC recommendations which were provided as this outbreak occurred. Additional instructions may be required as the COVID-19 outbreak conditions change, including new information about the virus, its transmission, and impacts, becomes available.

2.0 SYMPTOMS OF COVID-19

Symptoms associated with COVID-19 can cause illness ranging from the mild to severe, and in some cases, can be fatal. Symptoms typically include fever, cough, and shortness of breath. Some people infected with the virus have reported experiencing other non-respiratory symptoms. Other cases, referred to as asymptomatic cases, have experienced no symptoms at all. According to the CDC, symptoms of COVID-19 may appear in as few as 2 days or as long as 14 days after exposure.

3.0 HOW COVID-19 SPREADS

The virus is thought to spread from person to person, including:

- 3.1 Between people who are in close contact with one another (within about 6 feet).
- 3.2 Through respiratory droplets produced when an infected person coughs or sneezes. These droplets can land in the mouths or noses of people who are nearby or possibly be inhaled into the lungs.

It may be possible that 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. But this is not thought to be the primary way the virus is spread.

Persons are thought to be most contagious when they are most symptomatic (i.e., experiencing fever, cough, and/or shortness of breath). Some spread might be possible before people show symptoms; but this is also not thought to be the main way the virus spreads. The CDC website provides the latest information about COVID-19 transmission: www.cdc.gov/coronavirus/2019-ncov/about/transmission.html.

4.0 BASIC INFECTIOUS CONTROL MEASURES – UNIVERSAL PRECAUTIONS

In general, protecting employees will depend on emphasizing basic infection prevention measures. All JEG team members will implement good hygiene and infection control practices, including:

- 4.1 In the event that any employee is not feeling well, the employee is required to stay home.
- 4.2 Workers should attempt to distance themselves from others working nearby as much as possible. Supervisors should try to schedule work in areas with the least amount of people if possible. If not possible, maintaining a minimum of 6 feet distance from others will help minimize the potential for transmission. Wearing a mask is required when keeping a minimum 6 feet distance from others is not possible.
- 4.3 Workers should not use other's phones, desks, offices, or other work tools and equipment, when possible.
- 4.4 Any worker who has traveled internationally by airplane or other form a transportation that is prone to infection will not be allowed on a JEG project for a period of 14 days.
- 4.5 Eliminate sharing food on projects including donuts and vendor sponsored lunches.
- 4.6 Customary handshakes will be skipped, people will understand.
- 4.7 Wash your hands regularly with soap and water for at least 20 seconds, particularly prior to the start of shifts, prior to and after breaks and at the end of each day. If soap and running water are not immediately available, use alcohol-based hand sanitizer containing at least 60% alcohol. Hand sanitizing stations will be set up in common work areas.
- 4.8 Use proper respiratory etiquette (cough and sneeze cover) and hand hygiene.
- 4.9 Avoid touching your eyes, nose, and mouth.
- 4.10 Eat healthy and exercise.

5.0 IDENTIFICATION AND ISOLATION OF SICK PEOPLE

Prompt identification and isolation of potentially infectious individuals is a critical step in protecting workers. Whether provided by an owner, general contractor or JEG, all workers will be required to fill out daily a questionnaire similar to the example found in Attachment 1 as to their current status regarding three basic questions:

- 5.1 Has the employee experienced symptoms of fever, cough, shortness of breath, sore throat, or diarrhea?
- 5.2 Has the employee had close contact with an individual diagnosed with COVID-19?
- 5.3 Has the employee traveled via public transportation (airplane, train, bus, etc.) internationally in the last 14 days?

If an employee has answered YES to any of these questions, the following quarantines from JEG Company will be required:

- 5.4 If symptoms are present, a minimum of 10 days is required since symptoms first appeared. Employee must also have had 24 hours without fever without the use of fever-reducing medications, and improvement in respiratory symptoms.
- 5.5 14 days if the employee had close contact with an individual diagnosed with COVID-19. Close contact is considered being closer than 6 feet to another individual for a duration of 10 minutes or more.
- 5.6 14 days following international travel by public transportation (airplane, train, bus, etc.).

5.7 **Options to reduce quarantine.** Local public health authorities determine and establish the quarantine options for their jurisdictions. CDC currently recommends a quarantine period of 14 days. However, based on local circumstances and resources, the following options to shorten quarantine are acceptable alternatives. In both cases, additional criteria (e.g., continued symptom monitoring and masking through Day 14) must be met and are outlined in the full text.

5.7.1 Quarantine can end after Day 10 without testing and if no symptoms have been reported during daily monitoring.

5.7.2 *When diagnostic testing resources are sufficient and available*, then quarantine can end after Day 7 if a diagnostic specimen tests negative and if no symptoms were reported during daily monitoring. The specimen may be collected and tested within 48 hours before the time of planned quarantine discontinuation (e.g., in anticipation of testing delays), but quarantine cannot be discontinued earlier than after Day 7.

6.0 CASE MANAGEMENT

To ensure that a consistent, informative approach is conducted for all site employees affected by a COVID-19 incident, the following case management scenarios will be adhered to as outlined by the CDC. Any actual case characteristics that do not fit the scenarios listed below will be discussed by the COVID-19 Case Management Team to decide safest path forward. While these guidelines are consistent with CDC recommendations, requirements outlined by customers may exceed the below listed case management steps (i.e., requiring additional testing, etc.).

6.1 **Close Contact** – For use in case management, the term “Close Contact” refers to the following guidelines:

6.1.1. Person who was within 6 feet of someone who has COVID-19 for a total of 15 minutes or more accumulatively over a 24-hour period

6.1.2 Person who provided care at home to someone who is sick with COVID-19

6.1.3 Person who had direct physical contact with the person (hugged or kissed them)

6.1.4 Person who shared eating or drinking utensils

6.1.5 Another person sneezed, coughed, or somehow got respiratory droplets on person

6.2 **Scenario #1 – Employee Tests Positive for COVID-19**

An employee under this scenario would isolate for 10 days since the onset of their symptoms. Prior to returning, the employee must have completed their 10-day isolation period, be fever free for 24 hours without the aid of fever reducing medication, and have other symptoms improving.

6.3 **Scenario #2 – Employee Tests Positive for COVID-19 and is Asymptomatic**

An employee under this scenario would isolate for 10 days from date of positive test. If the employee becomes symptomatic during the isolation period, refer to Section 6.2. The employee may return to work if they remain asymptomatic throughout the 10-day isolation period.

6.4 Scenario #3 – Employee Has Symptoms Possibly Related to COVID-19

This employee would get tested immediately and quarantine until results are received:

- 6.4.1 If Positive – Isolate for 10 days from onset of symptoms including 24 hours fever free without the use of fever reducing medication and have other symptoms improving.
- 6.4.2 If Negative – Return to Work once symptoms have reduced within reasonable range for working on site.

6.5 Scenario #4 – Employee Has Come in Close Contact with Someone Exhibiting Possible Symptoms

An employee under this scenario would be able to stay on site until the test results of the individual being tested are received if they are willing to wear an N95 mask and continue social distancing protocols. If the test comes back positive the employee would then have to quarantine for 14 days from the date of last contact with the positive employee. If allowed by local health department and project client, quarantine options may include a 10-day quarantine without any sign of symptoms or a 7-day quarantine if a negative test is achieved on or after day 5 of quarantine as outlined in Section 5.7.

6.6 Scenario #5 – Employee has Come in Close Contact with Someone Who Tested Positive Who They Do Not Live With

The employee would be quarantined for 14 days from the date of last contact with the positive employee. If allowed by local health department and project client, quarantine options may include a 10-day quarantine without any sign of symptoms or a 7-day quarantine if a negative test is achieved on or after day 5 of quarantine as outlined in Section 5.7.

6.7 Scenario # 6 – Employee has Come in Close Contact with Someone Who Tested Positive Who They Do Live With

The employee would quarantine for 14 days beginning on the date that all personnel in the household are no longer contagious with COVID-19.

6.8 Secondary Contact

Secondary contact would be considered contact with a person who had close contact with someone who has tested positive for the virus or who is exhibiting COVID-19 symptoms. No quarantining is required for secondary contact scenarios, however, at the discretion of the employee, testing may be considered a reasonable option.

7.0 WORKPLACE CONTROLS

The best way to control any hazard is to systematically remove it from the workplace, rather than relying on workers to reduce their exposure. This systematic approach is called the “hierarchy of controls” and is designed to emphasize controls that work without exposing employees to the hazard. During the COVID-19 outbreak, when it may not be feasible to eliminate the hazard, the most effective protection measures (listed from most effective to least effective) are: engineering controls, administrative controls and safe work practices and PPE. In most cases, a combination of control measures will be necessary to protect workers from exposure to COVID-19.

7.1 Engineering Controls

Engineering controls involve isolating employees from work-related hazards. These types of controls reduce exposure to hazards without relying on worker behavior and are generally cost effective. Engineering controls for COVID-19 on JEG projects may include:

- 7.1.1 Install high-efficiency air filters.
- 7.1.2 Increase ventilation rates.
- 7.1.3 Install physical barriers, such as clear plastic sheeting.

7.2 Administrative Controls

Administrative controls require actions by the worker or employer. Administrative controls are change in work policy or procedures to reduce or minimize exposure to a hazard. Administrative controls for COVID-19 on JEG projects will include:

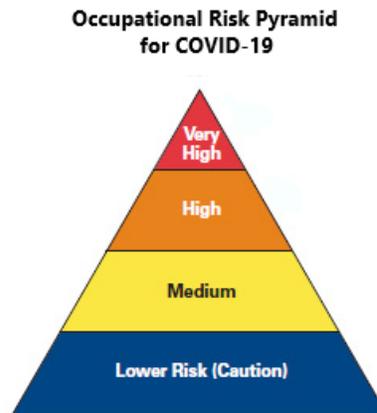
- 7.2.1 Sick workers are required to stay home.
- 7.2.2 Minimize contact among workers, clients, and the public by replacing face-to-face meetings with virtual communications and implementing telework when feasible.
- 7.2.3 Discontinue nonessential travel to locations with ongoing COVID-19 outbreaks.
- 7.2.4 Provide workers with up-to-date education and training on COVID-19 risk factors and possible barriers (covering mouth when coughing, etc..).
- 7.2.5 Train workers who need to use protective clothing and equipment on how to put it on, use/wear it, and take it off correctly, including in the context of their current and potential duties.
- 7.2.6 Employees will fill out a daily questionnaire as described in Section 5.0 Identification and Isolation of Sick People.
- 7.2.7 Social distancing will require workers to stay a minimum of 6 feet from other works as described in Section 4.0 Basic Infectious Control Measures.
- 7.2.8 When feasible, stagger start times and breaks that reduce the number of employees in an area at a given time, allowing them to maintain distancing requirements. This includes the use of transportation (bus or 15 passenger vans) on to or off a jobsite.
- 7.2.9 Use signage as needed to identify areas of concern throughout a project and to keep visitors and the public from entering work areas.
- 7.2.10 JEG will provide a work environment that promotes personal hygiene to include hand soap and washing facilities when feasible, and/or hand sanitizer with at least 60% alcohol content, disinfectants, and disposable towels for workers to clean surfaces.

7.3 Personal Protective Equipment

While engineering and administrative controls are considered more effective in minimizing exposure to COVID-19, PPE may also be needed to prevent certain exposures. While correctly using PPE can prevent some exposures, it should not take the place of other prevention strategies.

Examples of PPE include: Gloves, safety glasses, goggles, face shields, Tyvek suits (coated and non-coated) and respiratory protection to include N95 and surgical masks. Recommendations for PPE during the COVID-19 outbreak should be selected based on task risk and information on PPE effectiveness in preventing exposure. Owners rules may elect to require additional PPE than is listed in this plan. Follow the guidelines from the CDC in Attachment 2 below for properly putting on and taking off any PPE item.

Each task performed at JEG during the COVID-19 outbreak needs to be categorized into one of the following categories:



Task Risk Assessments:

Tasks at JEG should be assessed for transmission risk as follows:

- 7.3.1 **Low Risk** – general work on most projects – follow Universal Precautions as outlined above. If you must work within 6 feet of another individual, you are required to wear a mask with a filtration equal to or greater than surgical Level 1.
- 7.3.2 **Medium Risk** – working in hospitals or on projects that include high public traffic – these projects will require the use of nitrile gloves and a mask with a filtration equal to or greater than surgical Level 1.
- 7.3.3 **High Risk** – working on active sanitary lines and inside air handling units - these employees will be required to wear Tyvek suits (if working on sanitary lines use coated Tyvek) including hoods and booties, safety glasses with face shield, two layers of nitrile gloves and a N95 dust mask.
- 7.3.4 **Very High Risk** – these jobs are those with high potential for exposure to known sources of COVID-19 and do not normally include work JEG conducts. These jobs are generally performed by health care workers. The JEG Safety Director should be contacted immediately if a worker is being asked to perform work within this risk level.

The local JEG branch safety manager should be contacted if there is any question whether a given task is associated with a certain risk level.

8.0 DISINFECTING GUIDELINES

Research suggests that COVID-19 can live on various surfaces for a few hours up to several days, depending on the type of surface. Therefore, it is safe to assume that it could live for several days on jobsite tools, equipment, and building materials, as well as many surfaces in trailers, and office buildings. If surfaces can remain untouched for 7 days, it is safe to assume that there is no exposure potential. General cleaning of commonly used surfaces (phones, doorknobs, hand rails, keyboards and tools) where there is no known exposure should occur at least daily. Should cleaning and disinfecting be required following a known case of COVID-19, a third-party organization will be contacted to complete the cleaning process.

8.1 Delay Cleaning and Disinfecting Surfaces

Giving surfaces some time prior to starting the cleaning and disinfecting process increases the likelihood that any virus that is present will lose its potency before being exposed to it. Tools returning from high risk projects (sanitary or from inside air handling units) should remain in the toolboxes for a minimum of 7 days prior to opening. After completing this quarantine period, tools should be cleaned and disinfected as other surfaces outlined below.

8.2 Soaps, Detergents and Disinfectants

Any type of soap or detergent is acceptable for cleaning surfaces. For disinfectants, any alcohol-based solutions must contain at least 70% alcohol or use a bleach solution where 1/3 cup of bleach is diluted in a gallon of water. The EPA also provides a list of recommended disinfectants at <https://www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2>.

8.3 Process for Cleaning General Commonly Used Areas and Surfaces

If dirty, clean commonly used surfaces with detergent or soap and water before disinfecting them. Use the following process for cleaning surfaces:

- 8.3.1 Wear safety glasses.
- 8.3.2 Wear nitrile inner gloves.
- 8.3.3 Wear flexible rubber outer gloves.
- 8.3.4 Use a sponge or microfiber cleaning cloth to saturate, wipe down, and clean the surfaces.
- 8.3.5 Use a clean wet sponge or microfiber cleaning cloth to rinse the cleaned surfaces.
- 8.3.6 Let the surfaces air dry for a few minutes before disinfecting them.

8.4 Process for Disinfecting Commonly Used Surfaces

- 8.4.1 Keep all the personal protective equipment that were used for cleaning the surfaces in place.
- 8.4.2 Use a sponge or microfiber cleaning cloth saturated in the chemical disinfectant solution to thoroughly wipe down all surfaces.
- 8.4.3 Frequently wring out the sponge or cleaning cloth into an empty bucket and re-saturate with the disinfectant solution.
- 8.4.4 Allow the disinfected surface to air dry.
- 8.4.5 Ensure that employees follow the CDC recommendations found in Attachment 2 for removing any PPE.

9.0 POTENTIAL OR CONFIRMED CASE OF COVID-19 ON PROJECT

If an employee states that they feel sick or has had contact with someone in their household who is sick and possibly infected with COVID-19, follow this procedure:

- 9.1 Move potentially infectious person to an isolated area and restrict individuals work area.
- 9.2 Provide employee with a mask and surgical gloves.
- 9.3 Isolate tools that individual was using.
- 9.4 Have any personnel who have come in contact with individual immediately and thoroughly wash their hands.
- 9.5 Direct individual to leave work and go home or to a health center.
- 9.6 Individual to follow quarantine instructions found in Section 5.0 of this plan.
- 9.7 Contact JEG Branch Superintendent who will contact JEG Safety Department immediately for further instructions.

10.0 TRAINING

JEG will conduct training on this plan to include testing to ensure that specific points of this training are understood. Training will be conducted as soon as possible to ensure employees receive it in a timely manner.

11.0 JEG COVID-19 AUDITS

Projects will be audited weekly to ensure that this plan is being followed on jobsites. If areas of this plan are not being completed correctly, additional training will be required for all onsite employees on the portion of the plan where needed.

12.0 VACCINATIONS

In general, vaccinations will not be mandatory at JEG. However, JEG reserves the right to meet any customer and/or any local/state/national government requirements that mandate a vaccination for JEG employees for specific projects. Should an employee refuse a mandatory vaccination due to health or religious reasons, the JEG HR Department should be contacted immediately.

To maintain business continuity and per CDC recommendations, JEG will keep record of employees who complete the vaccination process. Employees will be asked to provide visual proof of vaccination showing employee name and date of vaccination completion once the final vaccination dose is administered. This information will be recorded and kept confidential by the JEG Safety/HR Departments.