## May 7, 2020

**FMG Concrete Cutting COVID-19 Exposure Prevention Plan, Preparedness, and Response**

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As we all know every construction project, we undertake is different. What is feasible and appropriate for any one project depends on its size, location and other unique characteristics. As the situation evolves, we should continue to monitor the jobsites where our people and subcontractors are working so we can react accordingly.

FMG Concrete Cutting 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 must remain vigilant in mitigating the outbreak. 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.

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. FMG Concrete Cutting 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 or forward questions to upper management. Managers and supervisors must set a good example by following this Plan. 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

FMG Concrete Cutting 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 play their part. As set forth below, FMG has instituted various housekeeping, social distancing, and other best practices while at work. 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 Joe or Frank.

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.

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

• Coughing;

• Fever;

• 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 supervisor and reach out to your heathcare provider for further guidance. Likewise, if you come into close contact with someone showing these symptoms, call your supervisor and healthcare provider right away.

III. Job Site –(General Conduct)

A. General Safety Awareness

Any employee/contractor/visitor showing symptoms of COVID-19 will be asked to leave the jobsite and return home.

Employees must avoid physical contact with others and shall direct all others 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.

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. You can eat in your truck to minimize exposure.

Employees should always keep a few gallons of water in their water tank located in their truck to wash their hands. Soap will be provided.

Employees should limit the use of other worker’s tools and equipment. To the extent tools must be shared, FMG will provide sanitizing spray and towels to clean tools before and after use. When cleaning tools and equipment, please consult Vince or Frank for proper cleaning techniques and restrictions.

Employees are encouraged to use best 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 are encouraged to wear the masks provided and open windows to ensure adequate ventilation.

If practicable, each employee should use/drive the same truck or piece of equipment. If using a backer, please wipe down controls, handlebars, and other contact items as needed.

In lieu of using a common source of drinking water, such as a cooler, employees should use individual water bottles.

*Additional Jobsite Safety Precautions Include:*   
Additional Precautions that May be Appropriate for Specific Companies, Business Operations or Projects

B. Workers entering Occupied Building and Homes

Construction and maintenance activities within occupied homes, office buildings, and other establishments, present unique hazards with regards to COVID-19 exposures. Everyone working within such establishments should evaluate the specific hazards when determining best practices related to COVID-19.

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. What to expect on the Job. The new norm for Site Procedures

Screening:

Questionnaire-

All employees may be screened in advance of arriving on the job site. If the visitor answers “yes” to any of the following questions, he/she will not be permitted to access the jobsite:

1. Have you been confirmed positive for COVID-19?
2. Are you currently experiencing, or recently experienced, any acute respiratory illness symptoms such as fever, chills, cough, or shortness of breath?
3. Have you been in close contact with any persons who has been confirmed positive for COVID-19?
4. Have you been in close contact with any persons who have traveled and are also exhibiting acute respiratory illness symptoms?

Temperature screening-

Once an employee arrives on site their temperature may be checked by a safety person with an infrared thermometer. Anyone whose temperature is at 100.4 degrees Fahrenheit or higher will not be allowed on site. The employee must stay home, call a physician, and not come to work until free of symptoms for at least 72 hours, without the use of medicine, or as recommended by the CDC. Refer to CDC guideline

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), FMG Concrete Cutting will provide:

* Gloves: Gloves should be worn at all times where applicable. 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.
* Employees must wear face mask or respirators.

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.

VI. Jobsite Exposure Situations

**Employee Exhibits COVID-19 Symptoms**

If an employee exhibits COVID-19 symptom, 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).

**Return to work for Displaying Symptoms**

Once an employee does not display any signs of COVID-19 symptoms for 3 consecutive (full) days they may return to work which also requires the employee to obtain a doctor’s note clearing them to return to work when practical.

**Employee Tests Positive for COVID-19**

An employee who tests positive for COVID-19 will be directed to self-quarantine away from work and contact their health provider. 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 who 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; and (2) at least seven (7) days have passed since symptoms first appeared. Employees who test positive and have been hospitalized may return to work when directed to do so by their medical care providers. FMG will require an employee to provide documentation clearing his or her return to work.

**Return to work for Positive cases**

The employee must obtain a doctor’s note clearing them to return to work.

**Employee Has Close Contact with an Individual Who Has Tested Positive for COVID-19**

Employees who have come into close contact with an individual who has tested positive for COVID-19 (co-worker or otherwise) will be directed to self-quarantine for 14 days from the last date of close contact with that individual. Close contact is defined as six (6) feet for a prolonged period of time.

**Disclosure Procedure**

If FMG learns that an employee has tested positive, FMG will conduct an investigation to determine co-workers who may have had close contact with the confirmed positive employee in the prior 14 days and direct those individuals who have had close contact with the confirmed-positive employee to self-quarantine for 14 days from the last date of close contact with that employee. If applicable, FMG 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 those individuals.

**Reaction Process**

Employees who develop symptoms during their shift must be immediately isolated and referred to a medical professional. Any and all areas where the employee was working will be immediately disinfected.

**Re-entry Process**

Any employee who temperature is deemed unacceptable will be subjected to standard above listed as Employee Exhibits COVID-19 Symptoms.

VII. OSHA Recordkeeping

If a confirmed case of COVID-19 is reported, FMG will determine if it meets the criteria for recordability and reportability 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 employee. “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 recordability analysis is not necessarily triggered at that time.

If an employee has a confirmed case of COVID-19, FMG 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.

The Company’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 COVID19 that is considered work-related, FMG 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.

VIIII. General Questions

Given the fast-developing nature of the COVID-19 outbreak, FMG Concrete Cutting may modify this Plan on a case by case basis. If you have any questions concerning this Plan, please contact Joe or Frank.

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 supervisor and health-care provider immediately. Do the same thing if you come into close contact with someone showing these symptoms.

*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.

CDC Guidelines - Mask Reuse Recommendations:

There is no way of determining the maximum possible number of safe reuses for an N95 respirator as a generic number to be applied in all cases. Safe N95 reuse is affected by a number of variables that impact respirator function and contamination over time. (18, 19) However, manufacturers of N95 respirators may have specific guidance regarding reuse of their product. The recommendations below are designed to provide practical advice so that N95 respirators are discarded before they become a significant risk for contact transmission or their functionality is reduced.

If reuse of N95 respirators is permitted, respiratory protection program administrators should ensure adherence to administrative and engineering controls to limit potential N95 respirator surface contamination (e.g., use of barriers to prevent droplet spray contamination) and consider additional training and/or reminders (e.g., posters) for staff to reinforce the need to minimize unnecessary contact with the respirator surface, strict adherence to hand hygiene practices, and proper PPE donning and doffing technique, including physical inspection and performing a user seal check.

<https://www.cdc.gov/niosh/topics/hcwcontrols/recommendedguidanceextuse.html>