COVID-19
Exposure Prevention, Preparedness, and Response Plan
Developed by Construction Industry Safety Coalition (CISC) March 25, 2020
Revised by The Associated General Contractors of America (AGC) March 31, 2020
Adapted by Pioneer Engineering & Environmental Services, LLC April 8, 2020

This document is not intended to be a definitive statement of the protocols and procedures that are applicable to each and every project. Nor are they endeavoring to provide legal or other professional advice. This document should NOT be construed as legal advice or any other expression of the scope or nature of a contractor's legal obligation to provide employment and a safe place of employment to its employees, particularly under the unprecedented circumstances that the COVID-19 outbreak has created. In addition, new and better information could well supersede the information included in this document. As the situation evolves, contractors/employees should continue to monitor the environment in which they are working and related developments and react accordingly.

Pioneer Engineering & Environmental Service, LLC (hereinafter “Pioneer”) takes the health and safety of its employees very seriously. With the spread of the coronavirus or “COVID-19,” a respiratory disease caused by the SARS-CoV-2 virus, Pioneer must remain vigilant in mitigating the outbreak. Pioneer is a proud partner of the construction and real estate industries, which Illinois has 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 Pioneer, at all of our jobsites, and in the office. Pioneer has also identified specific employees to monitor the related guidance that U.S. Center for Disease Control and Prevention (“CDC”) and Occupational Safety and Health Administration (“OSHA”) continue to make available.

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

Pioneer is asking every one of its employees to help with virus prevention efforts while at work. In order to minimize the spread of COVID-19 at our jobsites and office, everyone must play their part. As set forth below, Pioneer has instituted various housekeeping,
social distancing, and other best practices at our jobsites and at the office. 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 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 with your elbow.
- 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; or difficulty breathing; and early symptoms such as chills, body aches, sore throat, headache, diarrhea, nausea/vomiting, and runny nose.

If you develop any of the above symptoms, 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.

III. Office and Job Site Protective Measures

Pioneer has instituted the following protective measures at all jobsites, as well as in the office.

A. General Safety Policies and Rules

- Any employee/contractor/visitor showing symptoms of COVID-19 will be asked to leave the jobsite/office and return home.
- Safety meetings will be by telephone or video conference, if possible. If safety meetings are conducted in-person, attendance will be collected verbally and the field manager 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 shall direct others (co-
workers/contractors/visitors) to increase personal space to at least six (6) feet, where
possible. Where work trailers are used by other site workers, Pioneer employees
should not enter the trailers unless specifically directed to 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.

• Pioneer understands that, due to the nature of our work, access to running water for
hand washing may be impracticable. In these situations, Pioneer 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, Pioneer 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 minimize ride-sharing. While in vehicles, employees
must ensure adequate ventilation.

• If practicable, each employee 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.

B. Inspectors/Workers entering Occupied Building and Homes

• Construction and inspection activities within occupied homes, office buildings, and
other establishments, present unique hazards with regard 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, when practicable, employees must sanitize the work areas upon
arrival, throughout the workday, and immediately before departure. Pioneer 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. Inspectors/workers should wash or sanitize hands immediately before
starting and after completing the work.

C. Office Visitors

• The number of visitors to the office will be limited to only those necessary.
All visitors will be screened in advance of arriving at the office. If the visitor answers "yes" to any of the following questions, he/she should not be permitted to enter the building:

- 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 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?

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), Pioneer 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 when necessary while on-site.

**NOTE:** The CDC is currently not recommending that healthy people wear N95 respirators to prevent the spread of COVID-19 in order to reserve these masks for the healthcare industry. However, cloth face coverings in public settings where other social distancing measures are difficult to maintain is recommended for healthy people. Nevertheless, employees must 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.
IV. Job Site and Office Cleaning and Disinfecting

Pioneer 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.

- Break/lunchroom areas will be cleaned at least once per day. Employees/contractors 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 office or jobsite must be changed frequently by someone wearing nitrile, latex, or vinyl gloves.
- Pioneer will ensure that hand sanitizer dispensers are available. 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 change in operator or rider.
- OSHA has indicated in a reliable report that an employee testing positive for COVID-19 does not typically require that an employer perform special cleaning or decontamination of work environments, unless those environments are visibly contaminated with blood or other bodily fluids. Notwithstanding, Pioneer will clean those areas of the office that a confirmed-positive individual may have contacted and it will do so before employees can access that work space again.
- Pioneer 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 (if appropriate for the surface).

V. Jobsite Exposure Situations

Employee Exhibits 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). Pioneer will similarly require an employee who reports to work with symptoms to return home until he or she is symptom free for 72 hours (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 who 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 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; Pioneer will require an employee to provide documentation clearing his or her return to work in this instance.

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 within six (6) feet for a prolonged period of time.

If Pioneer learns that an employee has tested positive, Pioneer 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, Pioneer will also notify any clients, 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.

VI. OSHA Recordkeeping

If a confirmed case of COVID-19 is reported, Pioneer will determine if it meets the criteria for record-ability and report-ability 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 record-ability analysis is not necessarily triggered at that time.

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

Pioneer’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, Pioneer 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.

VII. Confidentiality/Privacy

Except for circumstances in which Pioneer 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. Pioneer 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. Pioneer also reserves the right to inform clients, 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.
VIII. General Questions

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

****

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. Pioneer may also amend this Plan based on operational needs.