**GARLAND CONSTRUCTION CORPORATION**

General Contractor

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Garland Construction’s Plan for COVID-19

Exposure Prevention, Preparedness, and Response

Garland Construction Corporation (hereinafter “Company” or “Garland”) 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, the Company must remain vigilant in mitigating the outbreak. The Company is a proud part of the construction industry, which many have 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 the Company and at all of our jobsites. The Company has also identified a team of 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.

**Jilliane Orwat , President**

**Daniel Orwat, Vice President & Safety Officer**

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. 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**

The Company 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, 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. If they cannot answer the question, please contact **Daniel Orwat, Vice President 413-533-7699**

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 healthcare provider right away. Likewise, if you come into close contact with someone showing these symptoms, call your supervisor and healthcare provider right away.

**Garland Construction Main Office # 413-533-7699**

**III. Job Site Protective Measures**

Garland Construction 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.

• 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 shall direct others (coworkers/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. Face mask should be worn at all times and must be worn when in the presence of others.

• 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.

• Garland will divide crews/staff into two (2) groups where possible so that projects can continue working effectively in the event that one of the divided teams is required to quarantine.

• As part of the division of crews/staff, the Company will divide employees into dedicated shifts, at which point employees will remain with their dedicated shifts for the reminder 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 will not participate in ride-sharing.

• 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. Workers entering Occupied Building and Homes**

Temperature readings shall be performed prior to Construction and maintenance activities within occupied homes, office buildings, and other establishments or confined spaces. 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. The Company will provide alcohol-based wipes upon availability or cleaning agents for this purpose.

• Employees should ask other occupants to keep a personal distance of six (6) feet at a minimum and wear a facial mask that covers their nose and mouth. 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. Upon entering a building or confined space, employee will need to take their temperature.

• 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:

o Have you been confirmed positive for COVID-19?

o Are you currently experiencing, or recently experienced, any acute respiratory illness symptoms such as fever, cough, or shortness of breath?

o Have you been in close contact with any persons who has been confirmed positive for

COVID-19?

o Have you been in close contact with any persons who have traveled and are also exhibiting acute respiratory illness symptoms?

o Have you been ordered to self-quarantine by a doctor or public health official?

• 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), the Company will also provide:

o 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.

o Eye protection: Eye protection should be worn at all times while on-site.

o NOTE: The CDC is currently not recommending that healthy people wear N95 respirators to prevent the spread of COVID-19. 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:

o Face coverings are recommenced at all times and must be worn at all times when within 6 feet of any other persons.

o Keep dust down by using engineering and work practice controls, specifically through the use of water delivery and dust collection systems.

o Limit exposure time to the extent practicable.

o 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 Cleaning and Disinfecting**

Garland 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.

• Jobsite 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 jobsite toilets should be cleaned by the leasing company at least twice per week and disinfected on the inside and will be cleaned after each use or at minimum twice daily. The Company will ensure that hand sanitizer dispensers are always filled by the leasing company. 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.

• The Company will clean those areas of the jobsite that a confirmed-positive individual may have contacted and it will do so before employees can access that work space again.

• The Company will ensure that any disinfection shall be conducted using one of the following:

o Common EPA-registered household disinfectant;

o Alcohol solution with at least 60% alcohol; or

o Diluted household bleach solutions (if appropriate for the surface).

• The Company will maintain Safety Data Sheets of all disinfectants used on site.

**V. Jobsite Exposure Situations**

A COVID-19 Daily Checklist will be provided to each employee prior to the start of the project that will be required to be completed prior to on-site work beginning. The COVID-19 Officer designated by the facility/owner/client will be provided to each employee prior to start of project.

**COVID-19 Officer**:

**Contact #:**

**Email:**

A copy of the checklist is required to be send to the company contact: Jilliane Orwat, President via fax at 413-532-6046, email at [jorwat@garlandconstructioncorp.com](mailto:jorwat@garlandconstructioncorp.com) or via text messaging.

• **Employee Exhibits COVID-19 Symptoms or feel sick**

If an employee exhibits COVID-19 symptoms, feels sick or if an employee is witnessed as feeling sick…GO HOME!

If work is being performed inside a building, room, or confined space, temperature will need to be taken prior to entering the building.

The company directs ANY workers with COVID-19 symptoms to leave the job site immediately and contact their health care provider.

The company will work with notifying the local board of health, COVID-19 Safety Officer, Site Facility Safety Officer to identify any potential jobsite exposures, including:

* Other workers, vendors, inspectors, or visitors to the work site with close contact to the individual
* Work areas such as designated work stations or rooms etc.
* Work tools and equipment
* Common areas such as break rooms and tables, vending machines, and sanitary facilities

**\*The Identity of the worker will be kept confidential**

Any employee who are considered close contacts to a COVID-19 case should not return to work for 14 days and are subject to quarantine by public health.

Any employee who leaves during the work day due to COVID-19 symptoms and develop COVID-19 as confirmed by laboratory testing or diagnosed by a health care provider shall not return to the site until released from isolation by a health care provider or public health. Documentation of negative testing will need to be provided

**VI. OSHA Recordkeeping**

If a confirmed case of COVID-19 is reported, the Company 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, the Company 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.

Garland’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, the Company 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 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 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. The Company 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. The Company 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.

**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.

**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.

**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 influenza and other respiratory pathogens. 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-2, 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.

o This includes other elements of the jobsite where possible.

o 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 if available:

o 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.

o Face coverings should be worn at all times especially when in presence of others.

o Eye protection: Eye protection should be worn at all times while on-site.

To obtain more detail about the Coronavirus, please refer to the following informational websites:

<https://www.mass.gov/resource/information-on-the-outbreak-of-coronavirus-disease-2019-covid-19>

<https://www.cdc.gov/coronavirus/2019-ncov/index.html>

<https://www.osha.gov/SLTC/covid-19/>

<https://www.who.int/emergencies/diseases/novel-coronavirus-2019>