

When COVID-19 Shows Up On The Jobsite

Per OSHA 3990-03 2020 “Guidance on Preparing Workplaces for COVID-19”. Work areas have been classified into four categories based on the level of risk. They are as follows:

Very High Exposure Risk Very high exposure risk jobs are those with high potential for exposure to known or suspected sources of COVID-19 during specific medical, postmortem, or laboratory procedures. Workers in this category include:

- Healthcare workers (e.g., doctors, nurses, dentists, paramedics, emergency medical technicians) performing aerosol-generating procedures (e.g., intubation, cough induction procedures, bronchoscopies, some dental procedures and exams, or invasive specimen collection) on known or suspected COVID-19 patients.
- Healthcare or laboratory personnel collecting or handling specimens from known or suspected COVID-19 patients (e.g., manipulating cultures from known or suspected COVID-19 patients).
- Morgue workers performing autopsies, which generally involve aerosol-generating procedures, on the bodies of people who are known to have, or suspected of having, COVID-19 at the time of their death.

High Exposure Risk High exposure risk jobs are those with high potential for exposure to known or suspected sources of COVID-19. Workers in this category include:

- Healthcare delivery and support staff (e.g., doctors, nurses, and other hospital staff who must enter patients’ rooms) exposed to known or suspected COVID-19 patients. (Note: when such workers perform aerosol-generating procedures, their exposure risk level becomes very high.)
- Medical transport workers (e.g., ambulance vehicle operators) moving known or suspected COVID-19 patients in enclosed vehicles.
- Mortuary workers involved in preparing (e.g., for burial or cremation) the bodies of people who are known to have, or suspected of having, COVID-19 at the time of their death

Medium Exposure Risk Medium exposure risk jobs include those that require frequent and/or close contact with (i.e., within 6 feet of) people who may be infected with SARS-CoV-2, but who are not known or suspected COVID-19 patients. In areas without ongoing community transmission, workers in this risk group may have frequent contact with travelers who may return from international locations with widespread COVID-19 transmission. In areas where there is ongoing community transmission, workers in this category may have contact with the general public (e.g., schools, high-population-density work environments, some high-volume retail settings).

Lower Exposure Risk (Caution) Lower exposure risk (caution) jobs are those that do not require contact with people known to be, or suspected of being, infected with SARS-CoV-2 nor frequent close contact with (i.e., within 6 feet of) the general public. Workers in this category have minimal occupational contact with the public and other coworkers.

As a construction related company, we have been deemed “essential”. We maintain the infrastructure that allows society to function. It is the responsibility of each of us to properly identify the environment in which we work. We are to create, enhance and/or control our work environment in a manner to minimize risk, and to take the appropriate protective measures when in that environment. When

administration and/or engineering controls can be applied to lower the risk, then they too should be applied.

Most often our construction sites will be deemed Medium and/or Lower Exposure Risk. For example: A grocery store, open to the public, may be a Lower Exposure Risk in “back of store” and may be classified a “Medium Exposure Risk” if working in the retail area. However, if barricades are erected to keep the general public out of the work area, then the area could be downgraded to a Lower Exposure Risk. If we are asked to enter a patient care facility, we could be entering a Very High Exposure Risk area.

JSA (Job Safety Analysis) and JHA (Job Hazard Analysis) is usually created by the work group who will perform the work within a given area. During the time in which COVID-19 is a concern, it is recommended that the JSA and/or FHAs be expanded to properly identify the work area’s risk category. Members of the work group should have an established protocol to collect and distribute new information. Each worker should be aware of the classification of the area’s risk and all members should be committed to sharing accurate information if and/or when the environment changes.

Barricades are just one Administration Control that can be applied to lower the exposure risk. Wash stations, private port-o-lets, cleaning supplies, and the means and methods discussed in the Ion/Apex video released on 3/29/2020 all have been listed and made available to lower the risk level.

Note that the OSHA 3990-03 2020 risk levels are directly related to a known or suspected individual with COVID-19 is within the work area. Therefore, a once declared Lower Exposure Risk area could become a Very High Exposure Risk instantaneously when a known or suspected individual with COVID-19 enters the space. Then the question becomes, what is the procedures to restore the area to an acceptable lower exposure risk area, and how should workers respond.

First and foremost, all individuals will be expected to act in a professional manner. Respect, dignity, grace, and professionalism shall be maintained throughout the following procedures.

Below are the guidelines for all Ion/Apex employees to follow if your workspace was deemed to be a Lower or Medium Exposure Risk and escalated to a possible High or Very High Exposure Risk area for any reason. Or when working in a known High or Very High Exposure Risk, and there is a failure in the established safeguards or the assumed risk levels are elevated.

Employee

- 1) Follow the procedures we use in active Chemical Plants. When a credible suspicions and/or indicator occurs, remove yourself and your team from the possible high-risk environment immediately. Retreat to a predetermined muster point.
 - a. Take your personal tools with you, if your workspace was deemed to be a Lower or Medium Exposure Risk and escalated to a possible High or Very High Exposure Risk area
 - b. Leave your tools. Evacuate immediately if working in a known High or Very High Exposure Risk, and there is a failure in the established safeguards or the assumed risk levels are elevated.
- 2) Maintain proper social distancing. Make sure everyone is accounted for. Do not leave the jobsite until instructions are received to do so.
- 3) Inform the General Contractor and/or other appropriate supervision.
- 4) Call our safety director (Mike Dudley), Brandon Housler (Scheduler Coordinator), or Jeff Kennedy (CEO) immediately.

- 5) Call your Project Manager
- 6) Wait for further direction,
 - a. You are being paid to “stand down”.
- 7) Assign someone to collect contact information from all involved.
- 8) Direct all request for statements from media or other outside sources to Shawn Cox.

Company Representative

- 9) A company representative will arrive posthaste.
- 10) Sanitizer wipes will be distributed to the employees.
 - a. “Wipe down” your tools while awaiting further instructions.
- 11) The company representative will collect data regarding the credible suspicions and/or indicator.
- 12) The company representative will then meet with the General Contractor and/or other appropriate supervision.

Company Representative and General Contractor and/or other appropriate supervision.

- 13) Will determine the validity of the credible suspicions and/or indicator.
 - a. Note: “In the time of public emergencies HIPAA Privacy Rules allow for patient information to be shared to assist in disaster relief efforts and to assist patients in receiving the care they need”.
 - i. Patients may include those known to be contagious and those who may be infected).
 - ii. “When imminent danger is present, providers can share patient information with anyone as necessary to prevent or lessen a serious and imminent threat to the health and safety of a person or the public -- consistent with applicable law and the provider’s standards of ethical conduct.”
 - iii. See <https://www.hhs.gov/sites/default/files/katrinanhipaa.pdf>
 - b. “Worker Protection is the Law of the Land You have the right to a safe workplace. The Occupational Safety and Health Act of 1970 (OSH Act) was passed to prevent workers from being killed or otherwise harmed at work. The law requires employers to provide their employees with working conditions that are free of known dangers. The OSH Act created the Occupational Safety and Health Administration (OSHA), which sets and enforces protective workplace safety and health standards. OSHA also provides information, training and assistance to employers and workers.”
 - i. “Review records of work-related injuries and illnesses that occur in their workplace.”
 - ii. “Receive copies of the results from tests and monitoring done to find and measure hazards in the workplace.”
 - iii. “Get copies of their workplace medical records.”
 - iv. <https://www.osha.gov/Publications/osha3021.pdf>
 - c. Local Health Departments promptly follows up on all individuals being tested for COVID-19. This involves a thorough investigation, prompt notification of positive cases and follow-up with close contacts.
 - i. For all positive cases contact tracing is completed by trained Public Health Nurses. This entails a thorough questionnaire from the Department of Health

Services to find out where our confirmed case has been, when their symptoms started, and look at who they were in close contact when potentially contagious.

- ii. Those who came into close contact with the individual will be notified promptly by our department and provided guidance and recommendations. We will also provide guidance and recommendations to any place of employment for these individuals. Therefore, determine a COVID-19 medical related status of an individual who is/or was in the work environment will/could eventually become public.
- iii. Receiving it posthaste is important and could save lives.

14) The following will be determined when the workspace was deemed to be a Lower or Medium Exposure Risk and escalated to a possible High or Very High Exposure Risk area

- a. A “No”: The suspicions and/or indicator where false or has little or no validity. No additional administrations control and/or procedures are required. Written notice has been received from the General Contractor and/or other appropriate supervision the area is deemed “clear” and to be a Lower or Medium Exposure Risk area. Upon receipt of this written notice:
 - i. work can resume.
- b. A “Maybe”: The suspicions and/or indicator cannot be verified false or true, or addition investigation and/or information is required.
 - i. Work will not continue for 84 hours from when the area was last infected or suspected of being infected.
- c. A “Yes”: The suspicions and/or indicator is confirmed to be true.
 - i. Work will not continue for 84 hours from when the area was last infected or suspected of being infected. And/or
 - 1. According to a recent study published in the New England Journal of Medicine, SARS-CoV-2, the virus that causes COVID-19, can live in the air and on surfaces between several hours and several days. The study found that the virus is viable for up to 72 hours on plastics, 48 hours on stainless steel, 24 hours on cardboard, and 4 hours on copper. It is also detectable in the air for three hours. Twelve hours has been added for additional safety measures.
 - ii. The area is properly disinfected and deemed “clear”. And
 - iii. Written notice is received from the General Contractor and/or other appropriate supervision the area is deemed “clear” and a Lower or Medium Exposure Risk area.
 - iv. If three events occur within 14 days, the Jobsite should be closed for 14 days

15) The following will be determined when the workspace was deemed to be a known High or Very High Exposure Risk, and there is a failure in the established safeguards or the assumed risk levels are elevated. (Example: a HVAC system creating negative pressure in a patient’s room was disabled, or proper safety procedures were not applied while caring for a patient). The following assumes the facility is deemed essential to maintaining “life” and the work to be performed is essential to maintaining “life”.

- a. Follow the procedures we use in active Chemical Plants. When a credible suspicions and/or indicator occurs, remove yourself and your team from the possible high-risk environment immediately.
- b. Call our safety director (Mike Dudley), Brandon Housler (Scheduler Coordinator), or Jeff Kennedy (CEO) immediately.
- c. Collect information and establish a new JHA.
- d. Only those who understand the risk and volunteer to perform the task(s) will participate.
- e. No one reenters the space without permission from Jeff Kennedy
 - i. If Jeff Kennedy is not available, obtain permission from Jim Wilson AND Mike Dudley.
- f. No one reenters the space without the proper PPE, procedures, and/or training.

16) Employees arriving home, after being in a possible infected area.

- a. "Wipe down" your tools (if you have them).
- b. "Wipe down" common touch areas in your car (handles, steering wheel, etc.).
- c. Wash and dry all clothing you wore to the jobsite (do not add other clothing).
 - i. Use hot water.
 - ii. Dry with high heat.
- d. "Wipe down" your boots.
- e. Take a shower.
- f. Follow any and all other instruction given to authorities having jurisdiction.

General note: Until permission has been granted to reenter a vacated work area for the reason herein, the employees SHALL NOT reenter the area. DO NOT enter to secure Company Tools and/or personal tools. DO NOT reenter to retrieve personal tools.

Addition Information:

List of Cleaning Companies specializing in COVID-19.

United Group Service, 9740 Near Drive, Cincinnati, Ohio 45246

Contact: Andy Joy

Office: 513 454-3532

Cell: 502 528-3930

SERVEPRO of Boone County

Office: 859 746-3400

SERVPRO of East Central Cincinnati

Office: 513 651-7378

Contact for Local Health Departments

<https://www.naccho.org/membership/lhd-directory?searchType=standard&lhd-state=KY#card-filter>