

## Clark Townsend

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**From:** Matthew Taylor CHST, SMS  
**Sent:** Thursday, April 2, 2020 11:48 AM  
**To:** Alex Kaszer; Skip Powell, CHST; Peter Paskiet STSC; Courtney O'Brien  
**Cc:** Jayson Waltz STSC; Jason Van Devender; Bill Giet; Chris Gunderman STSC; Matthew Maas STSC; Tom Lutgring; Clark Townsend; Siccorah Martin  
**Subject:** complete written program  
**Attachments:** [OCP Contractors Safety Plan for COVID.docx](#)

Lets get these printed out like a site safety program and include in it the sds's for the different cleaners we have been using please share the info with each other on the sds as we could have any of them any where. Also one add to the program in a whole was no use of shared appliances on site like microwaves or refrigerators.

Matthew Taylor SMS, CHST  
Corporate Safety Director



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## OCP Contractors Plan for COVID-19

### Exposure Prevention, Preparedness, and Response

OCP Contractors 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.

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.

#### *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.

#### *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, filling out daily health check sheet, 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 Matthew Taylor at 419-865-3772 office or 419-779-1274 cell.

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.**

#### Job Site Protective Measures

The Company has instituted the following protective measures at all jobsites.

1. Employees are required to perform a daily health screening check prior to entering a workplace.
  - a. Employees shall not come into work if sick and there will be no retaliation for doing so.
  - b. Employee having a fever shall not return to work until their fever has been gone without the use of fever reducing medicines for 72 hours.
2. All work sites shall be supplied and use wash stations. These stations shall be maintained with and have frequent cleaning.
3. Wash stations shall have:
  - a. Adequate supply of water
  - b. Soap
  - c. Paper towels
  - d. Trash can - Trash from this can shall be emptied daily.

4. Employees shall wash their hands before breaks, after using restrooms, entering or leaving the place of work, and/or after removing gloves using the CDC guidelines of no less than 20 sec.
5. Common tools (Chop saws, drills, scissor lifts, retractable, extension cords, aerial lifts, bakers, ladders, ect.) shall be clean with a disinfectant with a bleach, ammonia, or alcohol additive frequently throughout the day. **Ensure equipment is not energized prior to doing this.**
  - a. If practicable, each employee should use/drive the same truck or piece of equipment every shift.
6. Employees shall not share PPE this includes harness.
7. Employees shall not store personal PPE/harness, and tools inside gang boxes. This equipment shall be taken home daily and cleaned daily.
8. Employees shall wear safety glasses 100 percent of the time.
9. Employees shall wear gloves for all task.
10. Employee shall not gather and maintain 6' social distancing.
  - a. Toolbox talks shall change to employees receiving a written talk each week instead of group huddles
  - b. Employees will not be required to sign in each day and will be replaced with a roll call procedure in its place keeping 6' social distancing.
  - c. Employees shall maintain the 6' social distancing during all breaks.
  - d. Avoid working in areas that are trade stacking, if the 6 ft social distancing can not maintained do not work in area contact your supervisor.
  - e. Where work trailers/job offices are used, only necessary employees should enter the trailers/job offices and all employees should maintain social distancing while inside.
11. The sharing of OCP owned computers/ phones is prohibited and sharing of personal phones is strongly discouraged.
12. Employees should when arriving home immediately wash work clothing in hot water and wash skin contact areas before interacting with family members.
13. Employees are encouraged to minimize ride-sharing. While in vehicles, employees must ensure adequate ventilation.
14. All shared and catered meals shall be ceased until further notice. This includes liquids as well.
15. No shared appliances shall be used on work sites microwaves or refrigerators.
16. Any employee/contractor/visitor showing symptoms of COVID-19 will be asked to leave the jobsite and return home.

## Additional Jobsite Safety Precautions Include:

1. Job Site Visitors:
  - a. Visitors to OCP Contractors on site must complete our health evaluation sheet before entering.
  - b. The number of visitors to the job site, including the trailer or office, will be limited to only those necessary for the work.
2. Working Within Six Feet:
  - a. Tasks deemed to be necessary to work with in six feet of one another must follow these alternative means.
  - b. Managers must be trained and understand employee training and the following:
    - i. No task shall be deemed necessary unless it has been approved by both the Regional Safety Manager and the Superintendent.
    - ii. Regional Safety Managers and Superintendent shall physically evaluate each task on a jobsite to jobsite basis.
    - iii. Regional Safety Managers and Superintendents shall report all deemed task to the Corp. Safety Director along with the names of the employees performing the task prior to starting the task.
    - iv. Evaluation shall take into consideration the time as being critical to job sequencing, duration of time needed to complete task, and there are no other methods that could be used to complete by one person safely.
  - c. Employees must be trained and understand the following:
    - i. Face shields must be used. Face shields shall be of the type that protect from debris at the bill of the hard hat. The bill of the hard hat must be forward facing.
    - ii. Face shields shall be a minimum of 8 inches in length
    - iii. Employees must wear safety glasses with face shield
      1. Employees performing task must wipe down face shield inside and out with disinfecting material no less than every two hours. (Face shields shall not be worn during this procedure.)
    - iv. Face shields must remain down during the entire task.
    - v. Face shields must be removed from hard hat once the employee is no longer performing the task. When not in use face shields shall be stored in a plastic bag with that employee's name on it and kept from other employees gaining access to it.
    - vi. The face shield becomes part of that employees own personal PPE and shall follow the guidelines part of the Corona Virus Safe working procedures.
    - vii. When N 95 respirators become readily available to construction. The use of them on top of these procedures will be used during the COVID Emergency Period.

**This policy in no way should be used as method to make working within the 6' social distancing a common place.** Employees shall still use face shields while working alone during task such as but not limited to use of a chemicals when there is a splash hazard, chop saw, grinders, and/or handheld abrasive wheel tools.

Jobsite Exposure Situations ( All questions under this section shall be directed to Siccorah Martin at 419-280-4040 or Matt Taylor at 419-779-1274

- 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). The Company 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 shall obtain a doctor's note clearing them to return to work.

- Employee Being Tested For COVID-19

An employee that is being tested for COVID-19 shall follow the guidelines as a positive test until the test is proven to be negative and 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). To the **extent practical**, employees shall 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;3 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. **The Company will require an employee to provide documentation clearing his or her return to work.**

- Employee has had Direct Contact with an Individual Who Has Tested Positive for COVID-19 or is being Tested for COVID-19.

Employees who have come into close contact with an individual who has tested positive or being tested 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 or until a negative result is received. Close contact is defined as six (6) feet for a prolonged period.

If the Company learns that an employee has tested positive, the Company 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, the Company 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 also notify OCP Siccorah Martin at 419-280-4040 of the close contact and self-quarantine for 14 days from the last date of close contact with that individual.

### 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 decided 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.

### 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.

*General Questions*

Given the fast-developing nature of the COVID-19 outbreak, the Company may modify this Plan on a case by case basis. If you have any questions concerning this Plan, please contact Siccorah Martin (related to human resource questions unemployment, paid sick leave, and FMLA) at 419-280-4040 or Matthew Taylor at 419-779-1274 for all safety and health questions.