



COVID-19 Exposure Prevention, Preparedness and Response

Dated May 1, 2020

Grand Traverse Construction takes the health and safety of our employees, subcontractors and the entire community very seriously. With the spread of the coronavirus “COVID-19,” a respiratory disease caused by the SARS-CoV-2 virus, we all must play our role to stop the spread of this invisible disease.

In order to be safe and maintain operations, we have prepared this COVID-19 Exposure Prevention, Preparedness and Response Plan as detailed in Michigan Governor Gretchen Whitmer’s Executive Order 2020-70, dated May 1, 2020 and it will be implemented, to the extent feasible and appropriate, throughout Grand Traverse Construction and at all of our jobsites.

This Plan is prepared 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. We may also amend this Plan based on varying operational requirements.

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 always 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

Grand Traverse Construction is asking everyone on our jobsites 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, we have instituted various housekeeping, social distancing, and other best practices. All workers must follow these.

In addition, all employees are expected to report to their managers or supervisors if they are experiencing signs or symptoms of COVID-19, as described below:

- Coughing
- Fever
- Shortness of breath, difficulty breathing
- Early symptoms can include chills, body aches, sore throat, headache, diarrhea, nausea/vomiting and runny nose



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If you develop a fever and symptoms of respiratory illness, such as cough or shortness of breath, **DO NOT REPORT 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.

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 Bryan Lawton, Vice President and Director of Safety 231-649-0968.

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 protocol, which includes covering for coughs/sneeze
- Follow the recommended social distancing of 6'
- Avoid close contact with people who are sick.
- Wear face covering of some sort: mask, bandana, scarf when in an enclosed area. Face Shields must be worn when the 6' social distancing cannot be met.

III. Job Site Protective Measures

Grand Traverse Construction has implemented the following protective measures at all jobsites.

A. General Safety Policies and Rules

- Before beginning work the COVID-19 Essential Workplace Screening Tool must be completed and submitted DAILY to your immediate Supervisor. (This meets the requirements from health departments in Michigan as well as a first line of defense to prevent COVID-19 exposure onsite.)
- Any employee/contractor/visitor showing symptoms of COVID-19 will be asked to leave the jobsite and return home.
- Safety meetings will be by computer/mobile device, when 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.



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- 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.
- Workers 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 workers is to maintain social distancing while inside.
- All in-person meetings must be limited and to the fullest extent possible, meetings will be conducted by computer/mobile device.
- 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.
- GTC understands that due to the nature of our work, access to running water for hand washing may be impracticable. In these situations, alcohol-based hand sanitizers and/or wipes will be available.
- Workers should limit the use of co-worker's tools and equipment. To the extent tools must be shared, alcohol-based disinfectant will be available to clean tools before and after use. (When cleaning tools and equipment, consult manufacturing recommendations for proper cleaning techniques and restrictions.)
- Workers 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. An example of this is engineering controls when working with respirable dust.
- Workers are encouraged to minimize ridesharing. While in vehicles, workers must ensure adequate ventilation.
- If practicable, each worker should use/drive the same piece of equipment every shift.
- In lieu of using a common source of drinking water, such as a cooler, workers should use individual water bottles.



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B. Workers entering Occupied Building

- Construction and maintenance activities within occupied 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.
- During this work, workers must sanitize the work areas upon arrival, throughout the workday and immediately before departure.
- Workers should ask other occupants to keep a personal distance of six (6) feet at a minimum. Workers are to 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.
- All visitors will be screened when arriving to the job site using the same COVID-19 Essential Workplace Screening Tool used daily by workers before entering the worksite.
- Site deliveries will be permitted but should be properly coordinated in line with minimal contact and cleaning protocols. Delivery personnel should remain in their vehicles when possible or fill out the screening questionnaire.

D. Personal Protective Equipment and Work Practice Controls

- In addition to regular PPE for workers engaged in various tasks (fall protection, hard hats, safety glasses and hearing protection):
 - Gloves: Gloves should always be worn 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.
 - CDC recommended face mask will be worn at all time on the project site.
 - <https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/diy-cloth-face-coverings.html>



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- Working in close proximity with other workers, within the 6' for more than 15 minutes – Workers will wear a CDC face mask 100% of the time to prevent spread of the virus.
- The use of a face shield is recommended. This is again to stop potentially infectious material from getting to your face by putting a physical barrier in place to prevent touching your eyes, nose, and mouth.
- 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 using 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 Cleaning and Disinfecting

Grand Traverse Construction has instituted regular housekeeping practices, which include cleaning and disinfecting frequently used tools, equipment and other elements of the work environment, where possible. Workers should regularly do the same in their assigned work areas.

- Jobsite trailers and break/lunchroom areas will be cleaned at least once per day. Workers performing cleaning will be issued proper personal protective equipment (“PPE”), such as nitrile, latex, or vinyl gloves.
- Trash collected from the jobsite must be changed no less than once daily 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. Ensure that hand sanitizer dispensers are always filled. Frequently touched items (i.e. door pulls and toilet seats) will be disinfected a minimum of once per day.
- Vehicles and equipment (Forklift, MEWPs, etc)/tools should be cleaned at least once per day and before change in operator.



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- OSHA has indicated that a reliable report of an employee testing positive for COVID-19 does not typically require an employer to perform special cleaning or decontamination of work environments, unless those environments are visibly contaminated with blood or other bodily fluids. Notwithstanding this, those areas of the jobsite that a confirmed-positive individual may have contacted will be disinfected and it will be done before employees can access that work space again.
- GTC will ensure that any disinfection shall be conducted using one of the following:
 - Common EPA-registered disinfectant;
 - Alcohol solution with at least 60% alcohol; or
 - Diluted household bleach solutions (if appropriate for the surface).
 - Safety Data Sheets of all disinfectants will be available.

V. Jobsite Exposure Situations

Employee Exhibits COVID-19 Symptoms

- If a worker exhibits COVID-19 symptoms, the worker 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).
- GTC will similarly require a worker 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

- A worker who tests positive for COVID-19 will be directed to self-quarantine away from work. Workers 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.
- Workers 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.
- Workers who test positive and have been hospitalized may return to work when directed to do so by their medical care providers. Grand Traverse Construction will require an employee to provide documentation clearing his or her return to work.



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

- Workers 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.
- If GTC learns that a worker has tested positive, we will conduct an investigation to determine co-workers who may have had close contact with the confirmed positive worker in the prior 14 days and direct those individuals who have had close contact with the confirmed-positive worker to self-quarantine for 14 days from the last date of close contact with that worker.
- GTC will also notify any trade contractors, sub-contractors, vendors/suppliers or visitors who may have had close contact with the confirmed-positive worker.
- If a worker 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, Grand Traverse Construction 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 employees. "In-patient" hospitalization is defined as a formal admission to the in-patient service of a hospital or clinic for care or treatment.



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VII. Confidentiality/Privacy

Except for circumstances in which Grand Traverse Construction 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 worker has tested positive will be kept to the minimum needed to comply with reporting requirements and to limit the potential for transmission to others. GTC 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.

We also reserves the right to inform sub-contractors, vendors/suppliers or visitors that an unnamed worker 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, Grand Traverse Construction may modify this Plan on a case by case basis. If you have any questions concerning this Plan, please contact Bryan Lawton, Vice President and Director of Safety.