



## MEMORANDUM

To: All Business Manager/Secretary-Treasurers

From: Kenneth E. Rigmaiden  
General President

Date: April 6, 2020

Subject: **COVID-19 Jobsite Plan**

Attached for your reference is important information that my office distributed to IUPAT signatory contractors.

During these unprecedented times, we are facing a threat not only to our livelihood, but our safety and health, even our very lives. While every day it seems we are learning something new about this COVID-19 threat, there are some common sense guidelines that we can all take to reduce our risk and protect the lives of workers on the job, both during and after this crisis.

OSHA recommends employers prepare an Infectious Disease Preparedness and Response Plan to help guide protective actions against COVID-19. In response, the IUPAT, working in conjunction with the Finishing Trades Institute, the Labor Management Partnership and industry experts, has developed the Site Management Guidelines to not only assist contractors in developing their own jobsite plans, but to provide our members guidelines on the minimum standards that they should expect to find on the jobsite in the face of the COVID-19 pandemic, as well as any other potential viral hazards.

The guidelines are just that – guidelines. This document should not be relied upon as legal advice or interpretation of legal requirements to provide a safe workplace free from recognizable hazards, nor should it be a substitute for guidance from health professionals or governmental agencies. It is the responsibility of contractors to ensure that they follow all Federal, State and Local laws and regulations.

In addition, we will be hosting a webinar in the coming days, with FTI staff and an Industrial Hygienist, to walk through the plan and answer questions that you may have regarding these recommendations. Details are forthcoming. In the meantime, should you have any questions, or need additional information, please contact Director Anton Ruesing at 410-206-8115 or via email at [aruesing@iupat.org](mailto:aruesing@iupat.org).

Attachment

cc: GEB  
Dir. Ruesing, FTI/LMP/LMCI

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Office of  
Kenneth E. Rigmaiden  
General President

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# COVID-19 CONSTRUCTION SITE MANAGEMENT PLAN



## FORWARD

This COVID-19 Construction Site Management Plan (COVID-19 Plan or Plan) is designed to assist IUPAT Contractors and Employers in implementing worksite controls to reduce the risk of COVID-19 transmission among site workers and the public. This Plan was developed from Federal and State laws, policy and guidance, as well as professional industry research and standards of care in COVID-19 transmission risk reduction. The information used to develop this Plan is up to date as of April 3, 2020. This COVID-19 Plan is a Plan of "best practices" and does not take into account availability of resources or work site disruption; as its goal is to promote the best possible combination of methods to reduce COVID-19 transmission and protect workers. Removal of risk reduction controls, may reduce the effectiveness of the Plan to achieve the intended goal of reducing construction workers COVID-19 transmission risk to themselves and others. As this Plan is based on the current understanding of the pandemic, it will need to be updated as information on the pandemic and issued guidance evolves. The Employer has overall responsibility for worksite health and safety for its workers and visitors, however, worker(s) have an important part to play by carrying out the COVID-19 transmission risk reduction procedures as outlined in this Plan as well as Federal and State laws, policies and guidance applicable to the COVID-19 Pandemic.

## APPROVALS

\_\_\_\_\_  
Employer Authorized Agent

\_\_\_\_\_  
Employer COVID-19 Officer

\_\_\_\_\_  
BM/ST

**Finishing Trades Institute**  
7230 Parkway Drive  
Hanover, MD 21076  
7230 Parkway Drive





# COVID-19 CONSTRUCTION SITE MANAGEMENT PLAN



## POLICY STATEMENT

It is the mission of [Employer] to present a workplace free of recognized health and safety hazards as mandated under the preamble of the OSH Act of 1970 under Section 5(a)(1,2) as stated: "Each employer shall furnish to each of his employees employment and a place of employment which are free from recognized hazards that are causing or are likely to cause death or serious physical harm to his employees; shall comply with occupational safety and health standards promulgated under this Act." As Coronavirus is known hazard and the disease it causes could have significant health effects, including death, and could potentially be present on any worksite; its risk to workers will be assessed and controls shall be implemented and reviewed on an on-going basis. All trades and workers shall be governed under this Plan while working on this site.

## INTRODUCTION

It is now well understood that transmission of the COVID-19 virus can occur easily through contact with infected persons expelled droplets (from breathing, talking, coughing or sneezing) in air which then create airborne aerosols traveling up to distances of 27 feet and through cross contamination of surfaces. Therefore, it is important to evaluate a worksites risk factors which contribute to transmission of COVID-19 between workers (and the general public including workers family members) and then develop and implement control methods to reduce those risks. Certain factors will increase a person's risk to infection, while other factors will decrease the risk. The main risk factor of infection is whether or not a person is around those who are sick. People who are working during the COVID-19 pandemic are at increased risk if they frequently interact with potentially infected or infected individuals and/or work in areas where surface contamination may be present. Unfortunately, it is possible for a COVID-19 infected person to not show symptoms or only have mild symptoms and still infect others. This Plan will therefore implement a combination of different controls in an attempt to reduce the risk of COVID-19 transmission to as low as possible.

## SCOPE

All site personnel, including visitors, are required to comply with this Plan. Due to the high transmission potential of the COVID-19 virus, and its potential to effect multiple workers on any given site, [Employers compliance policy] procedures shall be implemented for site personnel violating the policies and procedures of this Plan.

This Plan pertains to all areas of the worksite (active work areas, staging areas, break areas, changing areas, bathrooms, etc.) as potential for COVID-19 transmission is possible anywhere workers are.

## ORGANIZATION, AUTHORITY AND RESPONSIBILITY

In order to develop, implement and maintain the effectiveness of this Plan, it is important for all stakeholders to clearly understand the responsibilities inherent in their job duties. Below are the minimum requirements necessary to remain compliant with this COVID-19 Construction Site Management Plan:

### Employer Responsibilities

- Develop, implement and maintain a [enter name of Employer] COVID-19 Construction Site Management Plan
- Designate a worksite COVID-19 Officer
- Develop, deliver and maintain a training course as outlined in the Plan for all site personnel and visitors
- Fund to the level appropriate the Plan to ensure compliance with this Plan and the applicable OSHA Standards, CDC guidance and applicable State and Local government rules; this includes funds for purchasing of vital equipment, disinfectants and cleaners and additional workers where necessary as well as funding of all related procedures
- [Employer] shall ensure that all known and current aspects of COVID-19 transmission risk reduction are captured in this Plan and that those aspects are effectively transferred through training sessions to all site personnel and visitors





# COVID-19 CONSTRUCTION SITE MANAGEMENT PLAN



## ORGANIZATION, AUTHORITY AND RESPONSIBILITY

### COVID-19 Officer (CO)

- Communicate to [Employer] the level of resources required to ensure compliance with this Plan (PPE, cleaning products, work staff, work schedules, etc.)
- Conduct Jobsite Hazard Analysis (JHA)/Jobsite Safety Analysis (JSA) for COVID-19 exposure and implement controls where necessary to reduce transmission risk
- Develop and implement a procedure to conduct daily worker symptom screenings
- Establish a “return to work” policy based on current CDC guidance
- Provide the appropriate amount of time for training and other Plan elements to supervisors, workers, and visitors to ensure compliance with this Plan
- Work with Supervisors, and Workers to ensure Plan compliance and effectiveness
- Review and revise the Plan as Federal standards or guidance changes as well as new information for the implementation of best practices

### Supervisor Responsibilities

- Ensure that workers receive training on this Plan
- Assure that personal protective equipment required for compliance with this plan are accessible to all site personnel and visitors
- Ensure site-wide compliance with this Plan
- Identify and document Plan deficiencies followed by communication of deficiencies to the Employer’s HCO in a timely manner
- Provide authority to affected workers and contractors to “stop work” when their health and safety is at risk due to Plan deficiencies.
- Investigate, document and control Plan deficiencies which may increase transmission spread and seek worker input for improvement

### Workers

- Workers will fulfill all Plan related requirements (e.g. reading the Plan, training, accessing PPE, etc.) on work time
- Read and understand the Plan and sign/date that they have done so
- Comply with this Plan and its procedures to help reduce the spread of COVID-19
- Workers will consult with their supervisor or CO whenever there are any questions regarding implementation of COVID-19 transmission risk reduction procedures
- Employees will report any concerning deficiencies in the Plan to their Supervisor or CO
- Follow appropriate safe work practices including use of engineering, administrative and personal protective equipment (PPE) controls
- Report all hazards, near-misses, incidents and accidents to supervisors as soon as it is safe to do so
- Exercise “stop work” when Plan deficiencies are assumed or identified; record the deficient situation and immediately communicate “stop work” reasoning to Supervisor





# COVID-19 CONSTRUCTION SITE MANAGEMENT PLAN



## ORGANIZATION, AUTHORITY AND RESPONSIBILITY

### Visitors

- Visitors shall read, understand and receive training on this Plan
- Visitors will adhere to and follow applicable worker requirements as listed above
- Visitors shall not modify Plan procedures

## TRAINING

Worker training is essential to the understanding and implementation of this Plan and the COVID-19 transmission reduction procedures listed within. Absent or deficient training can lead to spread of COVID-19. Training on this Plan must be delivered to workers before they return to work or visit the site and must be delivered in line with the social distancing requirements of this Plan

[Employer] will develop, deliver and maintain a COVID-19 transmission risk reduction training course which will meet applicable requirements of this Plan. The training course shall be updated as new pertinent information or guidance becomes available or when the plan is updated. The training course must include:

- Curriculum focused on the aspects of the Plan, with the overarching goal of developing the skills to effectively carryout the COVID-19 transmission risk reduction control methods
- The training must be long enough to ensure participants understand the Plan (this includes time for questions and control method hands-on if necessary)
- Course Agenda
- Training certificates
- Training records for each course given consisting of participants name, trainer, place, date, contact hours and copy of the course agenda
- Qualified trainers

In addition to initial training, the CO shall provide workers with up-to-date COVID-19 information through daily "tool box talks".

## WORKSITE TRANSMISSION RISK REDUCTION CONTROL MEASURES

It has been shown that transmission of the COVID-19 virus can occur from droplet, and airborne exposure from a COVID-19 infected person, as well as COVID-19 contaminated surfaces (door knobs, key pads, tools, etc.) where a person has contact with the contamination and then touches their mucous membranes (eyes, nose, mouth). The controls listed below will help reduce the risk of such transmission. Implementing and following these controls, as closely as possible, will reduce worker risk to contracting and spreading the COVID-19 virus.

### Work site social distancing

Perhaps the best risk reduction control is social distancing in an attempt to reduce encounters between infected and susceptible (those that do not have the virus) individuals. The current CDC guidance is that if you have to be out in public, stay at least 6 feet from other people, however, research has shown that it is possible for the virus to be carried upwards of 27 feet. Therefore, the greater distance that you can place between you and another person, the greater the reduction of risk that you may become infected. In addition, recent reports have stated that as many as 25-50% of the population may carry the virus without symptoms or mild symptoms, so you may not know if someone has the virus. To reiterate, the farther you can stay away from other people, the greater protection you are giving yourself.





# COVID-19 CONSTRUCTION SITE MANAGEMENT PLAN



## WORKSITE TRANSMISSION RISK REDUCTION CONTROL MEASURES

The following transmission reduction controls will be followed on this worksite:

- Working from home: for workers who can perform their job at home (e.g. office staff), arrangements will be made for them to do so
- The CO will be identifying opportunities to stagger work shifts, alternate work days, schedule jobs, etc. in an effort to reduce the number of workers on site at any given time; your supervisor will inform you of any work shift changes
- Commuting; do not commute to work on public transportation or in groups (e.g. avoid bus, rail, ridesharing, etc.). Drive/walk to work on your own. If driving, park in designated parking areas for this worksite located at XXXX
- The CO will establish Controlled Access Zones to your work area to prevent access from other trades, site visitors and the public in an effort to limit personal contact
- Checking in/out from the work site; upon checking into the worksite, maintain at least six feet between you and the person in front of you. Do not congregate in groups while waiting to enter or leave the worksite
- Work site meetings; meeting will be held with no more than 10 participants a distance of at least 6 feet between each participant shall be maintained
- Breaks and Lunch; the CO will establish a plan to stagger breaks and lunches, site personnel shall not take breaks and eat lunch together, maintain at least 6 feet between each other this will help maintain limited contact between workers
- Food trucks will be parked in a designated area on site; do not congregate and keep at least six feet between you and the next person waiting a head of you to order; all food trucks shall be required to have a procedure to reduce close interaction with customers who make purchases
- Bathroom visits; do not cointegrate or wait in line while waiting to use bathrooms or portable toilets
- Avoid working in groups; work alone (at least 6 feet apart) if possible and if it is safe to do so; for jobs requiring close contact (e.g. hanging wallboard, stabilizing ladders, working in enclosed or confined spaces, etc.) workers will wear at least N95 respirators (see PPE section below) and eye protection
- Interactions between workers when picking up or delivering equipment/materials will be minimized; schedule deliveries during times when worksite occupancy is low and organize staging of equipment/materials to minimize movement on site
- In an effort to help ensure at least six feet is maintained at common congregation areas (e.g. worksite check-in/out locations, at elevators, etc.); distance identifiers (tape on floors, cones, etc.) shall be placed every six feet to guide site social distancing efforts

NOTE: if at any time it is deemed unsafe to conduct certain work tasks with one or a limited number of workers, that task will be evaluated to determine if a safer method of execution is possible or that work will be suspended until a future time where the social distancing requirements are lifted.

## WORKSITE SICK POLICY

The following procedures are in place at this worksite:

- The [Employer] COVID-19 sick policy will be followed while the pandemic is on-going
- If you think you have been exposed to COVID-19 or if you have symptoms of infection call your healthcare provider immediately and stay home except to get medical care and separate yourself from other people in your home until expert medical advice is given from your medical care provider.
- Workers shall stay at home and not come to work if they are experiencing COVID-19 symptoms or otherwise feel sick.





# COVID-19 CONSTRUCTION SITE MANAGEMENT PLAN



## WORKSITE SICK POLICY

- A worker will be asked to leave the worksite when they start feeling sick or when they have been in close contact with a confirmed positive COVID-19 case. If someone goes home from the site due to sickness, the area where that person worked will be immediately disinfected with an EPA approved disinfectant (see contamination reduction, cleaning and disinfection section below)
- Workers are strongly encouraged to self-identify symptoms of fever, coughing, or shortness of breath each day, before the shift, mid-shift, and at home to their supervisor or the sites CO
- CO will ask sick work if they have been in close contact with other personnel on site that day
- [Employer] may implement a symptom check for workers upon arrival at the site which will include no contact thermometers and a questionnaire asking if the worker has experienced any fever, trouble breathing, shortness of breath or XXX; if the worker presents a fever of 100.4 or answers yes to any of the symptom questions, they will be asked to go home and contact their medical care provider
- The CDC guidelines for when you can discontinue home isolation and return to work will be followed for recovered sick workers wishing to resume work

## USE OF PERSONAL PROTECTIVE EQUIPMENT

Workers who wear a respirator shall do so under [the Employer] Respiratory Protection Program as required under 29 CFR 1910.134 via 29 CFR 1926.103 including medical clearance, fit testing, training, cleaning, maintenance and storing. All use of PPE shall be governed under [the Employer] PPE Program in accordance with 29 CFR 1926 Subpart E.

**On this worksite, PPE shall be administered to all personnel on site for required use as follows:**

- NIOSH-approved respirator certified as N95 or higher (e.g. N99 or N100) and eye protection for those working in close contact with others; NOTE, while safety glasses are a typical component of construction site PPE, any attempt to prevent virus laden aerosols from contacting the eyes will help to reduce transmission risk
- Facemasks, defined here as filtering facepieces with an efficiency lower than an N95 respirator, such as a medical facemask, will be worn by all other personnel while on site (e.g. workers who are not in close contact with others, visitors, etc.); NOTE; the CO may at any time require site wide N95 use (or higher) for all personnel on site
- Respirators designated as "disposable" shall not be worn more than one shift; and a new disposable respirator will be given to workers at the beginning of each shift

Protective gloves may also be assigned by the CO or Supervisor if contact with high-touch areas is possible

All reusable respirators and PPE shall be decontaminated and stored in accordance with [the Employers] Respiratory Protection and PPE Programs

All other worksite required PPE, for use in protecting workers against general and task specific construction hazards, must also be worn as required and in accordance with [Employers] Respiratory Protection and PPE Programs

NOTE: if a worker is not required to wear a respirator, they still may do so voluntarily under the voluntary use appendix of the Respiratory Protection Standard (29CFR1919.134 Appendix D)

## CONTAMINATION REDUCTION, CLEANING AND DISINFECTION

Since COVID-19 may survive outside of the body upwards of 72 hours, it is important that we limit touching high contact items/areas and clean and disinfect them as much as necessary to reduce the risk of contracting COVID-19 through contamination transfer from our hands to our eyes, nose and mouth.





# COVID-19 CONSTRUCTION SITE MANAGEMENT PLAN



## CONTAMINATION REDUCTION, CLEANING AND DISINFECTION

The following contamination reduction, cleaning and disinfection methods will be used at this worksite:

- Workers are encouraged not share other workers' PPE, phones, or other work tools and equipment
- This site has a "non-contact policy", site personnel are not to shake hands, high five, etc. while the pandemic is on-going
- Workers are required to use their own food containers and water bottles from home
- Soap and water wash stations will be placed outside of portable toilets and located at common areas (e.g. break areas, tool cribs, etc.)
- Signs reminding site personnel to avoid touching their eyes, nose, and mouth, frequently washing their hands, covering coughs/sneezes, locations of wash stations and social distancing policies will be posted around the site in common areas
- Hand washing guidelines will be posted at each wash station which will include: wash your hands often with soap and water for at least 20 seconds;
  - Before entering the jobsite and before you go home
  - After touching high-touch areas such as door knobs, handles, atm key pad, etc.
  - When hands are visibly dirty
  - After going to the bathroom
  - After blowing your nose, coughing, or sneezing
  - Before eating or drinking
- Frequently touched objects (including tools), surfaces and areas will be cleaned and disinfected frequently with an EPA's Registered Antimicrobial Products for Use Against Novel Coronavirus SARS-CoV-2, the Cause of COVID-19 listed product; the CO shall designate a disinfecting and cleaning personnel for each work shift (disinfecting and cleaning personnel shall receive necessary Hazard Communication Training in accordance with [Employers] Hazcom Program as required by 29 CFR1926.59)
- Change out areas will be designated for workers wanting to change out of work clothing before they leave the site







# COVID-19 CONSTRUCTION SITE MANAGEMENT PLAN



## OSHA

The following OSHA Laws may relate to the COVID-19 pandemic and will be incorporated and followed in efforts to reduce COVID-19 transmission and to protect the health and safety of workers on this site.

Work at this site may be governed by the following OSHA laws pertaining to the COVID-19 pandemic:

- 1926.25 Housekeeping
- 1926.28 Personal Protective Equipment
- 1926.51 Sanitization
- 1926.59 Hazard Communication
- 1926 Subpart E Personal Protective and Life Saving Equipment
- 1910.1030 Bloodborne Pathogen through 29 CFR 1926.21(b)(2)

Note: there may be pertinent State Laws that your employer must follow such as with California (Cal/OSHA Aerosol Transmissible Diseases (ATD) standard)

## RECORDS

The CO shall maintain all records related to this Plan, including training, hazard identification, and illnesses tracking in accordance with [the Employer] record retention Program and applicable OSHA Laws.

## PLAN REVIEW AND UPDATES

The CO shall review current information concerning the COVID-19 pandemic and the protection of worker health and safety including Federal Laws, orders and guidance, best practices issued through standards of care daily and revise this Plan as often as required until the pandemic is considered closed by the CDC or their State.

## WHERE TO GO TO LEARN MORE AND RECEIVE UPDATES

You can find greater detailed information on Coronavirus on the following websites. These sites will update their information and guidance as new information concerning the Coronavirus outbreak becomes available so it is important that you check in regularly for updated information until the outbreak has been considered "ended" by the CDC.

- <https://www.osha.gov/SLTC/covid-19>
- <https://www.nih.gov/health-information/coronavirus>
- <https://www.who.int/emergencies/diseases/novel-coronavirus-2019>

