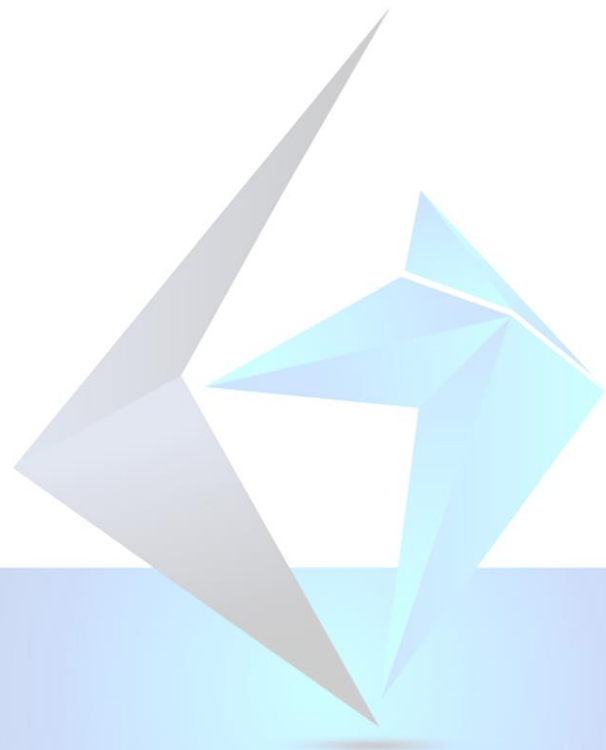


# ***Pandemic Safety and Health Policy***

***April 2020***





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## *Acronyms and Abbreviations*

%	Percent
CDC	Centers for Disease Control
CISA	Cybersecurity and Infrastructure Administration
DoD	Department of Defense
ft	Feet
JWG	JWG Construction, LLC
IAW	In Accordance With
OSHA	Occupational Safety and Health Administration
PM	Project Manager
PPE	Personal Protective Equipment
PSHP	Pandemic Safety and Health Plan
SSHO	Site Safety and Health Officer
U.S.	United States
USC	U.S. Code
WHO	World Health Organization

## ***Section 1 Purpose of the Pandemic Safety and Health Plan***

The purpose of this Pandemic Safety and Health Plan (PSHP) is to communicate and prepare project field teams in the event of a pandemic. A pandemic is defined by United States (U.S.) Centers for Disease Control (CDC) and World Health Organization (WHO) as the worldwide spread of a new disease (WHO, 2020). A pandemic occurs when a new virus emerges and spreads around the world because most of the population does not have immunity. This policy is a part of the JWG Health and Safety Program and aids in the identification of potential threats to project personnel health and safety during a pandemic situation in accordance with (IAW) the Occupational Safety and Health Administration (OSHA) OSH Act of 1970, as amended through January 2004 (29 U.S. Code [USC] 654).

During a pandemic, transmission of the pandemic virus can be anticipated in the workplace. Employee risks of occupational exposure to a virus during a pandemic may vary from very high to high, medium, or lower (caution) risk. The level of risk depends in part upon whether or not the job requires close proximity to people potentially infected with the pandemic virus, or whether the job will require repeated or extended contact with known or suspected sources of the pandemic virus. The risk levels as defined by OSHA are as follows:

- *Very High Exposure Risk* – Personnel in positions with high potential exposure to high concentrations of known or suspected sources of the pandemic virus during specific medical or laboratory procedures.
- *High Exposure Risk* – Personnel in positions with high potential for exposure to known or suspected sources of the pandemic virus.
- *Medium Exposure Risk* – Personnel in positions that require frequent, close contact (within 6 feet [ft]) exposures to other people such as coworkers, the public, outpatients, school children, or other such individuals or groups.
- *Lower Exposure Risk (caution)* – Personnel in positions that do not require contact with people known to be infected with the pandemic virus, nor frequent close contact (within 6 ft) of the public.

JWG has determined that field project personnel are at the Medium Exposure Risk level IAW the OSHA *Guidance on Preparing Workplaces for COVID-19* (OSHA, 2020). This risk assessment can be reviewed in the Activity Hazard Analysis provided in Annex A. In the event of a pandemic situation, JWG personnel are considered Essential Critical Infrastructure Workers IAW Department of Defense (DoD) Cybersecurity and Infrastructure Security Agency (CISA) guidance (CISA, 2020). Under Presidential guidance, Essential Critical Infrastructure Workers are tasked with continuing project operations during a pandemic situation (CISA, 2020). This PSHP describes procedures prepared by JWG to address and mitigate the risks posed to personnel during a pandemic situation.

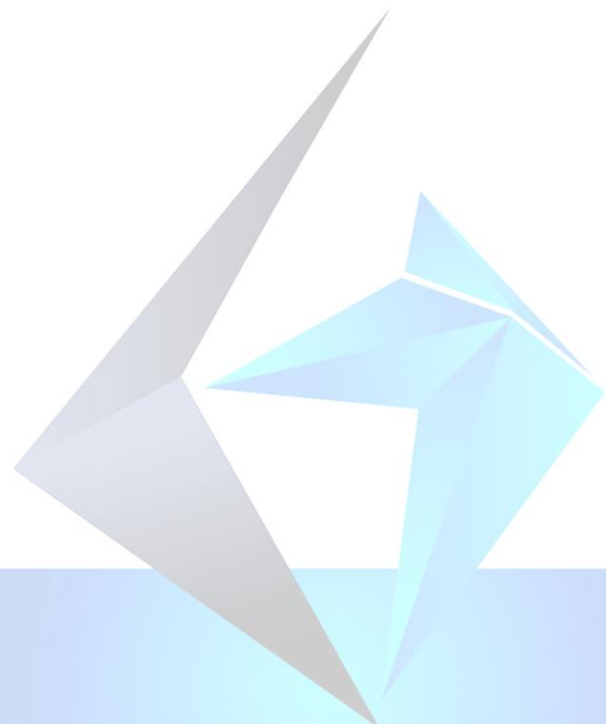


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## ***Section 2 Policy Statement***

Any field project personnel that suspects they may have been exposed to a pandemic virus or is experiencing symptoms will report the condition to the Site Safety and Health Officer (SSHO) on duty at a JWG project work site. The SSHO will ensure that the employee's symptomatic condition is documented in the Daily Safety Report (Annex B) and demobilize the employee from the JWG project work site IAW the approved project work plan.





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## ***Section 3 Responsibility and Accountability***

### ***3.1 Policy Responsibility***

The Corporate Health and Safety Department is responsible for the issuance, revision, and maintenance of this policy.

### ***3.2 Corporate Management***

JWG has the overall responsibility for the effective implementation and maintenance of this PSHP. This includes ensuring the necessary resources are provided and that Project Managers (PMs) and employees are held accountable for their responsibilities under this plan.

### ***3.3 Health and Safety Team***

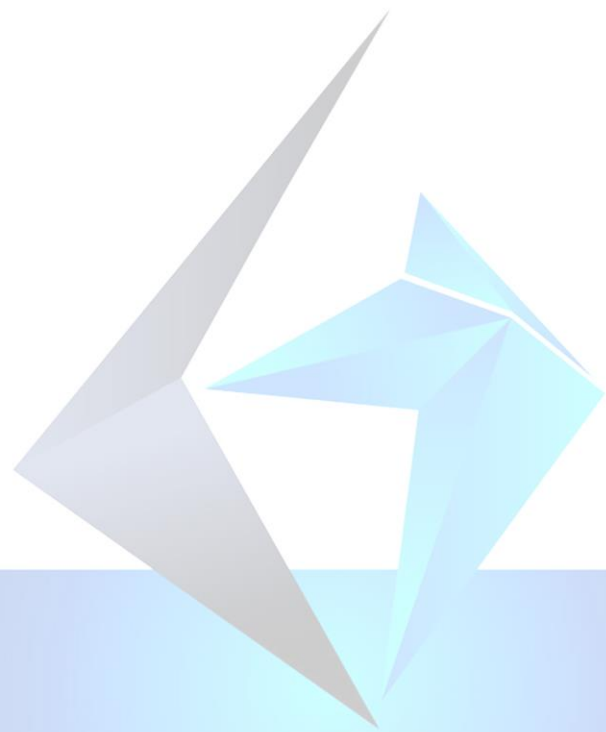
The Health and Safety Team is responsible for providing overall direction and personnel training for this PSHP and ensuring all elements are implemented accordingly.

### ***3.4 Project Managers***

PMs shall ensure that the requirements of this PSHP have been addressed for all areas and employees that they manage, including communicating policy requirements to their employees, ensuring that employee conditions are documented, and confirming any employee status changes (i.e., demobilization).

### ***3.5 Employees and Field Personnel***

Employees are responsible for performing their job duties in a manner that is compliant with the requirements of this PSHP. All field personnel must report any new symptoms of the pandemic virus to the Health and Safety Team immediately.



## ***Section 4 Pandemic Safety and Health Procedures***

This section describes the various elements of the PSHP that comprise the procedures identified to protect the health and safety of JWG field project personnel. This guidance is based upon traditional infection control and industrial hygiene practices. Appropriate control measures include engineering and administrative controls, work practices, and personal protective equipment (PPE). Although the first human cases of COVID-19 likely resulted from exposure to infected animals, infected people can spread the pandemic virus to other people by the following means:

- Between people who are in close contact with one another (within 6 ft); and
- Through respiratory droplets produced when an infected person coughs or sneezes. These droplets can land in the mouths or noses of people who are nearby and possibly be inhaled into the lungs (CDC, 2020b).

It may be possible that a person can contract the pandemic virus by touching a surface or object that has the virus on it and then subsequently touching their own mouth, nose, or possibly eyes (OSHA, 2020). Workers can be exposed to sources of the pandemic virus through the public, coworkers, and sick individuals. Individuals with underlying health conditions or in advanced age are at a higher risk of contracting the pandemic virus and suffering the greatest symptoms (OSHA, 2020). According to the CDC, symptoms of COVID-19 may appear in as few as two days or if 14 days after exposure (CDC, 2020b).

### ***4.1 Workplace Flexibilities and Protections***

Under conditions associated with a widespread pandemic virus situation, multiple areas of the U.S. and other countries may see impacts simultaneously. In the absence of a vaccine, an outbreak may also be an extended event. As a result, projects may experience the following:

- **Absenteeism:** Workers could be absent because they are sick; are caregivers for family members; are caregivers for children during school or daycare closures; have at-risk people at home, such as immunocompromised family members; or are afraid to come to work because of the fear of possible exposure.
- **Changes in Patterns of Commerce:** Consumer demand for items related to infection prevention (e.g., respirators) is likely to increase significantly. This could cause shortages of necessary project equipment or materials.
- **Interrupted Supply/Delivery:** Shipments of items from geographic areas severely affected by the pandemic virus may be delayed or cancelled with or without notification.

JWG has recognized that employees may need to stay home to care for a family member during pandemic situation and personnel are encouraged to stay home if they are sick or experiencing symptoms of the pandemic virus. Workplace flexibilities have been instituted to ensure employees are protected during a pandemic situation including, but not limited to flexible work sites, hours, and return to work policies.

#### ***4.1.1 Flexible Work Hours and Scheduling***

In the event of a pandemic situation, JWG will observe the following policies to protect personnel and the workplace from exposure to the pandemic virus whenever feasible.

- **Flexible Work Sites:** Personnel that have the capability to telecommute, should do so with the approval from their direct supervisor and/or the PM. This minimizes contact among employees, clients, and customers by replacing face-to-face meetings with virtual communications and implementing telework if feasible.



- **Flexible Work Hours:** Working shifts could be staggered to prevent close contact (within 6 ft) between personnel under coordination between the PM and SSHO. The project team can establish a schedule of alternating days or extra shifts that reduce the total number of employees in a facility at a given time, allowing personnel to maintain distance from one another while maintaining a full onsite work week.
- **Return to Work:** Personnel are not required to hold a healthcare provider's note to validate their illness or return to work. Employees will be excluded from work until at least three days have passed since recovery, defined as resolution of fever with the use of fever-reducing medications and improvement in respiratory symptoms, and at least seven days have elapsed since symptoms first appeared (CDC, 2020c).

Other issues may arise during a pandemic situation that are not described in this PSHP. Personnel are encouraged to discuss any other concerns with the PM, SSHO, and/or their direct supervisor.

## **4.2      *Management of a Pandemic Situation***

Pandemic Awareness Training will be provided by the SSHO during the initial mobilization and any time new personnel mobilize or visitors arrive onsite. The training will include a review of the attributes of the pandemic virus (e.g., infection spread and symptoms), workplace protections and flexibilities, and associated controls to mitigate risk and prevent exposure.

At the start of each shift, the SSHO will provide a safety briefing to include any pandemic situational updates from the local area (i.e., state and/or county statistics and resources). These updates will be documented in the Daily Safety Brief form found in Annex B.

### **4.2.1      Social Distancing**

Social distancing includes certain actions taken by Public Health officials to stop or slow the spread of a pandemic virus or highly contagious illness. Social distancing measures are taken to restrict when and where people can gather including limiting large groups of people from coming together, closing buildings, and cancelling large events. Guidance from the CDC (CDC, 2020a) recommends the following practices:

- Listen to and follow the directions of state and local authorities
- Wear face coverings or masks in public or around coworkers
- If an employee feels sick, they should stay in their accommodations and not go to work. The employee should contact the project SSHO and their medical provider
- If someone in an employee's household has tested positive for the pandemic virus, the household should self-quarantine
- If the employee is older, has an underlying medical condition, or has children, the household is at a higher risk of contracting the illness
- Employees should avoid social gatherings of 10 or more people
- Employees should avoid discretionary travel including shopping trips or social visits
- Employees should avoid high traffic areas, including restaurants and bars. Use drive-thru, pickup, or delivery options; and
- Employees should always maintain a minimum of 6 ft between themselves and any other person.

Social distancing practices should be exercised on and off site. If an employee suspects that they may have been exposed to the pandemic virus, they should immediately report the situation to the SSHO and/or PM.



#### **4.2.2 Personal Protective Equipment**

Each site must be sanitary and quarantined from potential exposure to a pandemic virus. Surface cleaners and hand sanitizers will always be maintained onsite. Cloth masks or face coverings will be worn by all employees always IAW DoD requirements (DoD, 2020). Personnel will maintain a working distance of 6ft from each other unless work activities require close contact (within 6 ft). If work activities require that personnel come into proximity to one another, physical barriers and ventilation using High- Efficiency air filtration will be installed wherever feasible and appropriate PPE will be donned including:

- Surgical Gloves
- Masks/Eye Protection/Face Shields; and
- Coveralls/Jacket.

All PPE used while working in proximity will be removed prior to leaving the site and placed in a suitable container for disposal. Disposable gloves are to be replaced if they are torn, punctured, or otherwise lose their ability to function as an “exposure barrier”. The SSHO will provide training on the appropriate donning and doffing procedures in the context of the pandemic situation.

#### **4.2.3 Infection Control Practices**

The SSHO will perform a cleaning and disinfecting of all surfaces twice during each shift at a project work site. Hand washing and sanitizer facilities will be provided onsite. All areas will be closed off if practical before cleaning and disinfecting common surfaces in the work environment. The SSHO will spray each surface with a disinfecting aerosol (e.g., Lysol, Odo-Ban, Micro-Ban, etc.) as directed by the manufacturer label on the container. Gloves and a facial covering or mask are required when performing any cleaning or disinfecting activities. The following can be used for disinfection:

- Diluted household bleach solutions (5 tablespoons of bleach per gallon of water);
- Alcohol solutions with at least 70% alcohol; or
- EPA-registered household disinfectants (CDC, 2020d).

Personnel are required to wear safety glasses, disposable gloves, and coveralls for all cleaning activities, including waste removal. Additional PPE may be required based off the disinfectant manufacturer specifications.

Safe work practices will be implemented, and materials will be provided to promote personal hygiene including tissues, hand soap or alcohol-based hand rubs containing at least 60 percent (%) alcohol, disinfectants, and disposable towels. Personnel are encouraged to frequently wash and/or sanitize hands throughout the workday. Personnel are required to practice good hygiene including but not limited to:

- Wash hands with soap and water for a minimum of 20 seconds after touching any frequently used item or surface
- Avoid facial touching
- Sneeze or cough into a tissue or inside of the elbow; and
- Disinfect frequently used items and surfaces as often as possible.

Any visitors to the project work site will be required to maintain a minimum distance of 6 ft away from all personnel and work activities while onsite.

#### **4.2.4 Notification of Potential Exposure, Suspected, or Confirmed Cases of the Pandemic Virus**

People are most contagious when they are most symptomatic (i.e., experiencing fever, cough, and/or shortness of breath) (OSHA, 2020). During the daily safety briefing, the SSHO will request that any employees experiencing symptoms of the pandemic virus indicate that they may be affected. Employees are required self-observe and remain alert to any possible subjective symptoms. If an employee identifies subjective symptoms of the pandemic virus, then that employee is required to immediately report change in conditions to the SSHO. SSHOs with first-hand knowledge of the symptomatic employee are required to:

- Immediately demobilize the employee from the project work site
- Disinfect all hard surfaces onsite using anti-bacterial, anti-viral, and anti-microbial cleaner (e.g., Lysol brand disinfectant); and
- Notify PM and other personnel onsite of the potential exposure to a pandemic virus.

Any employee that has identified symptoms of the pandemic virus should immediately self-quarantine. The SSHO will provide a breathing mask and sanitizer to the affected employee to mitigate further exposure.

The Contracting Authority or Commercial Clients (Crown Plaza Resort Staff) will be notified of any suspected or confirmed cases of the pandemic virus by the PM immediately upon identification.





## ***Section 5 References***

29 USC 654. *OSH Act of 1970, Section 5. Duties.* January 1,

2004 CDC, 2020a. *15 Days to Slow the Spread.* March 2020.

CDC, 2020b. *Symptoms of Coronavirus.* March 2020.

CDC, 2020c. *Criteria for Return to Work for Healthcare Personnel with Confirmed or Suspected COVID-*

*19.* March 2020.

CDC, 2020d. *List N: Disinfectants for Use Against SARS-CoV-2.* April 2020.

CISA, 2020. *Memorandum on Identification of Essential Critical Infrastructure Workers During COVID- 19 Response.* March 2020.

DoD, 2020. *Department of Defense Guidance on the Use of Cloth Face Coverings.* April 2020.

OSHA, 2020. *Guidance on Preparing Workplaces for COVID-19.* OSHA 3990-03 2020. March 2020.

WHO, 2020. *What is a pandemic? Emergencies Preparedness, Response: Pandemic and Epidemic Diseases.* March 2020.

