

TRIANGLE ASSOCIATES

**COVID-19
PERSONAL
PROTECTION
PLAN**

JUNE 12, 2020





Since the announcement of the COVID-19 pandemic all employers have been required to develop programs that contain feasible means and methods to protect their employees from exposure to COVID-19 in the workplace which are compliant with CDC Guidance as well as Orders and Guidance that are issued by state and local regulatory and health authorities.

Triangle Associates has developed a COVID-19 Personal Protective Equipment (COVID-19 PPE) standard which is intended to provide means and methods that are believed to be consistent with current CDC Guidance and such Orders and Guidance maintaining 6' social distancing. Further, understanding that OSHA, the CDC nor any other Federal, state, or local regulatory agency has yet published COVID-19 PPE recommendations to accommodate situations where 6' distancing cannot be maintained, Triangle is adopting these minimum additional COVID-19 PPE standards defined herein for the situations where 6' distancing cannot be maintained while performing tasks/work.

This COVID-19 PPE standard is incorporated into Triangle Associates' Employee Handbook Safety Program for all projects and as such, Triangle Associates expects all subcontractors to meet or exceed this standard through their own EH&S programs including informing their employees of this standard, training them in its various requirements and expect them to monitor and take immediate corrective action when any variance from the standard are observed.

Note that Triangle assumes no liability for any personal injury, medical expenses or other damages that may be sustained by any trade partner, its employees or any other person who may be at a Company worksite for actual or potential exposure to COVID-19 or for subsequent illness or treatment.

Should any trade partner, trade partner employee, or any other person who may be at a Triangle worksite be unable or unwilling to work within the standard, then work requiring COVID-19 PPE shall not be performed and Triangle shall be notified immediately by the trade partner, its employees or any other person so work can be re-evaluated.

Triangle is committed to actively caring for the safety, health and wellbeing of everyone on our project sites and in our offices. CDC guidelines suggest that maintaining 6' distance is the best way to prevent the spread of the COVID-19 virus.

To reduce the potential exposure and spread of Coronavirus (COVID-19), we are providing standards for minimum requirements for COVID-19 personal protective equipment (PPE) use when engineering, administrative, and elimination of risk controls cannot maintain six foot distance between workers on Triangle project sites thereby putting them in close contact with one another. The objectives are to have a virus-free environment to prevent the spread of a highly infectious virus.

All tasks and work should first be reviewed in an effort to maintain 6' distance between crews and workers. Each trade partners foreman will be required to observe and ensure 6' distance is maintained between their crews and to perform their work that can be conducted in that manner. To that end, a risk assessment and Pre-Task Plan (PTP) evaluating and documenting the controls put in place should be completed and reviewed with all workers.

Triangle will follow the current Executive Order 114 (Summarized below) which states the following protocol for Business or operations in the construction industry. It should be noted that within the current executive order it is not a requirement to wear face covering on a construction work site. This is the only deviation from our previous published Triangle PPE Standards. Triangle will require each individual to have a face covering on their person in the event they come within the 6' social distancing space. Face coverings will be required if working within the 6' social distancing space or passing within hallways, stairways, elevators or other etc. Triangle will continue to support those that wish to wear a face covering



and provide means of proper disposal daily. Please refer to the PTP section below for more specific direction when working within the 6' social distancing space.

Summary of Executive Order 114

- a. Conduct a daily entry screening protocol for employees, contractors, suppliers, and any other individuals entering a worksite, including a questionnaire covering symptoms and suspected or confirmed exposure to people with possible COVID-19, together with, if possible, a temperature screening.
- b. Create dedicated entry point(s) at every worksite, if possible, for daily screening as provided in sub-provision (b) of this section, or in the alternative issue stickers or other indicators to employees to show that they received a screening before entering the worksite that day.
- c. Provide instructions for the distribution of personal protective equipment and designate on-site locations for soiled face coverings
- d. Require the use of work gloves where appropriate to prevent skin contact with contaminated surfaces.
- e. Identify choke points and high-risk areas where employees must stand near one another (such as hallways, hoists and elevators, break areas, water stations, and buses) and control their access and use (including through physical barriers) so that social distancing is maintained.
- f. Ensure there are sufficient hand-washing or hand-sanitizing stations at the worksite to enable easy access by employees.
- g. Notify contractors (if a subcontractor) or owners (if a contractor) of any confirmed COVID-19 cases among employees at the worksite.
- h. Restrict unnecessary movement between project sites.
- i. Create protocols for minimizing personal contact upon delivery of materials to the worksite

Pre-Task Planning Specifics:

When addressing the PTP guidelines the following should be considered when developing your site-specific safety plan. For non-task related interactions (passing on the stairs, riding a hoist, breaks, lunch, etc.) follow project specific guidelines, maintain 6' distance, and wear a cloth face covering.

The risk assessment will contain the following two questions that must be addressed:

1. Will the work as planned in the PTP allow for 6' distancing between your crew and other crews?
If the answer to this question is yes, then proceed with the work as planned in the PTP; (If a worker is alone or in a space greater than 6' a face covering is not required).
 - > Note: all work must be evaluated for the appropriate minimum PPE required by OSHA.
2. If the work as planned in the PTP does NOT allow for 6' distancing between your crew and other crews, are there alternative methods to put the work in a place that will maintain a 6' distance?
 - > If the answer to question two is no, fill out the section of the PTP titled Close Contact Work. The PTP should include:
 1. Minimum COVID-19 PPE requirements
 - o Surgical mask and face shield with safety glasses underneath or surgical mask and a goggle/face shield combo



- If a face shield or goggle/face shield combo cannot be obtained then a KN95 or similar mask with goggle should be used Nitrile gloves under task-specific gloves
2. Training on the task risks and how to wear; put on, take off, clean and store the PPE

Trade partners/vendors must have a program that is equal to or greater than the standards contained herein.

In addition to the PTP, each trade partner/vendor is responsible for having a COVID-19 risk mitigation plan that includes how they will protect their workers as it pertains to COVID-19. The plan should address at a minimum:

- > Site entry, including temperature screening and self-assessment questions, what to do if sick, handwashing, etc.
- > Risk assessment for each scope of work addressing maintaining 6' distancing including dispersion of workers, crew sizes, density of crews, daily huddle and gatherings
- > Assigning a distance monitor (foreman)
- > Employee training, education and safe work practices
- > Minimum COVID-19 PPE for normal and close contact work
- > Inspection criteria to review the plan
- > Regular cleaning and disinfecting protocols
- > Social distancing standards
- > How they will meet and follow these standards and current CDC guidelines (which may be modified from time to time).

CDC recommended sequence to put on PPE is as follows:

Putting on a mask:

- > Place it over the nose, mouth and chin.
- > Fit the flexible nose piece over the bridge of the nose.
- > Secure it on the head with ties or elastic.
- > Adjust it to fit.
- > If the mask has two elastic head bands, these should be separated. With the mask over the nose, mouth and chin, stretch the bands over the head and secure them comfortably – one on the upper back of the head and one below the ears at the base of the neck.

Putting on goggles and face shield:

- > Position goggles over the eyes and secure to the head using the ear pieces or headband.
- > Position the face shield over the face and secure it on the brow with the headband.
- > Adjust for comfort.

Putting on gloves:

- > Gloves are the last element of PPE to be applied.
- > Extend the hands into the gloves and extend the gloves to cover the wrist of the gown or Tyvek suit.
- > Tuck the cuffs of the gown securely under each glove. (If gown or Tyvek Suit are not being worn pull gloves to cover over wrist)
- > Adjust for comfort and dexterity.



Safe Work Practices

- > Keep gloved hands away from the face
- > Avoid touching or adjusting other PPE
- > Remove gloves if they become torn; perform hand hygiene before putting on new gloves
- > Limit surfaces and items touched
- > Change when torn or heavily contaminated
- > Perform hand hygiene

Follow the links below for CDC sequencing for putting on or taking off PPE. Post these in each area where PPE will be put on or taken off.

<https://www.cdc.gov/hai/pdfs/ppe/ppe-sequence.pdf>

<https://www.cdc.gov/hai/pdfs/ppe/ppeposter148.pdf>

Cleaning requirements after PPE use:

These standards for cleaning must be followed every time a person must remove their PPE. For example, morning break, lunch, afternoon break, end of day, if PPE is removed for a cigarette break, or to use the restroom.

1. Remove and dispose of gloves per CDC guidelines. Do not touch outside of gloves.
2. Wash hands immediately with soap and water for at least 20 seconds.
3. Remove mask without touching outside or front. If it still maintains functionality, place in a paper bag for reuse and label who it belongs to. That person should retain control of their mask. Used masks should never be shared with another person.
4. Wash hands immediately with soap and water for at least 20 seconds.
5. Remove hard hat and goggles or face shield by loosening straps. Do not touch the front of the goggles or face shield. Clean thoroughly with soap and water or alcohol-based wipe or virucidal type cleaning solution
6. Wash hands immediately with soap and water for at least 20 seconds.
7. Remove protective clothing without touching outside of the garment and turn garment inside out before disposal.
8. Wash hands immediately with soap and water for at least 20 seconds.
9. Discard all non-reusable PPE in a trash receptacle with a lid.
10. Wash hands immediately with soap and water for at least 20 seconds.