Western Washington University COVID-19 Construction Project Site Safety Support
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1 BACKGROUND
The University is committed to the safety and security of all of its workers, staff, and all partners working on WWU projects to do their part to slow the spread of COVID-19. The University’s priorities as related to the work on WWU projects are as follows:

1. Support efforts to “flatten the curve”
2. Ensure the health and safety of the workforce
3. Optimize the productivity of essential work given the circumstances and while conforming to public health guidance

The University is requiring each project under construction to comply with the applicable requirements included in the following documents issued by the State of Washington Office of the Governor including the following.

1. Construction Guidance-Stay Home, Stay Healthy Proclamations (20-25), March 25, 2020
2. Implementation of Phase 1 Construction Restart – Proclamation 20-25, April 24, 2020
3. Phase 1 Construction Restart COVID-19 Job Site Requirements, April 23, 2020
4. Phase 2 Construction Restart COVID-19 Job Site Requirements, June 2, 2020

Part of the responsibilities of the construction contractors is the development and submission of a COVID-19 Safety Plan (Plan). This plan includes procedures to be followed to limit the spread of COVID-19 as outlined in the Phase 1 Construction Restart COVID-19 Job Site Requirements (projects operating prior to June 5, 2020) and Phase 2 Construction Restart COVID-19 Job Site Requirements.

To assist with the implementation of the recommended steps to “flatten the curve” of COVID-19 cases, WWU has requested PBS provide two levels of support during this critical time: 1) Review of COVID-19 Safety Plans for general conformance with recommendations and governmental orders related to COVID-19; and 2) Observation and documentation of proper implementation of COVID-19 Safety Plan protocols on project sites.

2 PHASE 2 CONSTRUCTION COVID-19 JOB SITE REQUIREMENTS
The following are a summary of requirements to be followed by contractors as part of Phase 2 of the Washington State Safe Start Plan which went into effect on June 5, 2020.

- **COVID-19 Site Supervisor**
  - A site-specific COVID-19 Supervisor shall be designated by the contractor.

- **Social Distancing**
  - Social distancing of at least 6 feet of separation must be maintained by every person on the worksite at all possible times.
  - In instances where the 6 feet separation cannot be maintained, the contractor shall prepare a Job Hazard Analysis (JHA) which shall be thoroughly reviewed by all workers performing the work prior to commencing those tasks. The JHA must include a list of engineering controls and proper Personal Protective Equipment (PPE), for all jobsite activities defined by Washington State Department of Labor & Industries (L&I) as medium and high transmission risk per attached L&I chart *Washington Coronavirus Hazard Considerations for Employers (except COVID-19 care in hospitals & clinics) Face Coverings, Masks, and Respirator Choices*, dated May 22, 2020.
• Gatherings of any size must be precluded by taking breaks and lunch in shifts. Any time two or more persons must meet, ensure minimum 6 feet of separation.

• Identify “choke points” and “high-risk areas” on job sites where workers typically congregate and control them so social distancing is always maintained.

• Minimize interactions when picking up or delivering equipment or materials, ensure minimum 6-foot separation.

• **Personal Protective Equipment**

  o Provide personal protective equipment (PPE) such as gloves, goggles, face shields and face masks as appropriate or required to employees for the activity being performed. Cloth facial coverings must be worn by every employee not working alone (with no chance of human interaction) on the jobsite unless their exposure dictates a higher level of protection under Department of Labor & Industries safety and health rules and guidance. Refer to [Coronavirus Facial Covering and Mask Requirements](https://www.doh.wa.gov/Portals/1/Documents/1600/coronavirus/ClothFacemasks.pdf) for additional details. A cloth facial covering is described in the Department of Health guidance, https://www.doh.wa.gov/Portals/1/Documents/1600/coronavirus/ClothFacemasks.pdf.

  o Appropriate eye protection for all hazards must be worn at all times by every employee while on the worksite.

  o If appropriate PPE cannot be provided, the work is not authorized to commence, recommence, or the site must be shut down.

• **Sanitation and Cleanliness**

  o Hand-washing stations, with soap and running water, shall be abundantly provided on all job sites for frequent handwashing. When running water is not available, portable washing stations, with soap, are required.

  o Workers should be encouraged to leave their workstations to wash their hands regularly, before and after going to the bathroom, before and after eating and after coughing, sneezing or blowing their nose.

  o Alcohol-based hand sanitizers with greater than 60% ethanol or 70% isopropanol can also be used but are not a replacement for the water requirement.

  o Post, in areas visible to all workers, required hygienic practices, including not to touch face with unwashed hands or with gloves; washing hands often with soap and water for at least 20 seconds; use hand sanitizer with at least 60% alcohol; cleaning and disinfecting frequently touched objects and surfaces such as workstations, keyboards, telephones, handrails, machines, shared tools, elevator control buttons, and doorknobs; covering the mouth and nose when coughing or sneezing as well as other hygienic recommendations by the U.S. Centers for Disease Control (CDC).

  o Make disinfectants available to workers throughout the worksite and ensure cleaning supplies are frequently replenished.

  o Frequently clean and disinfect high-touch surfaces on job sites and in offices, such as shared tools, machines, vehicles and other equipment, handrails, doorknobs, and portable toilets. If these areas cannot be cleaned and disinfected frequently, the jobsite shall be shut down until such measures can be achieved and maintained.

  o Shared tools and other equipment must be wipe sanitized between users.
When the worksite is an occupied home, workers should sanitize work areas upon arrival, throughout the workday and immediately before they leave, and occupants should keep a personal distance of at least 10 feet.

If an employee reports feeling sick and goes home, the area where that person worked should be immediately disinfected.

**Employee Health/Symptoms**

- Create policies which encourage workers to stay home or leave the worksite when feeling sick or when they have been in close contact with a confirmed positive case. If they develop symptoms of acute respiratory illness, they must seek medical attention and inform their employer.

- Have employees inform their supervisors if they have sick family member at home with COVID-19. If an employee has a family member sick with COVID-19, that employee must follow the isolation/quarantine requirements as established by the State Department of Health.

- Screen all workers at the beginning of their day by asking them if they have a fever, cough, shortness of breath, fatigue, muscle aches, or new loss of taste or smell.

- Ask employees to take their temperature at home prior to arriving at work or take their temperature when they arrive. Thermometers used shall be ‘no touch’ or ‘no contact’ to the greatest extent possible. If a ‘no touch’ or ‘no contact’ thermometer is not available, the thermometer must be properly sanitized between each use. Any worker with a temperature of 100.4°F or higher is considered to have a fever and must be sent home.

- Instruct workers to report to their supervisor if they develop symptoms of COVID-19 (e.g., fever, cough, shortness of breath, fatigue, muscle aches, or new loss of taste or smell). If symptoms develop during a shift, the worker should be immediately sent home. If symptoms develop while the worker is not working, the worker should not return to work until they have been evaluated by a healthcare provider.

- Failure of employees to comply will result in employees being sent home during the emergency actions. For example, if an employee refuses to wear the appropriate facial covering they would be sent home.

- Any worker performing construction craft work in Washington from any state that is not contiguous to Washington must self-quarantine for 14 days to become eligible to work on a job site in Washington.

- If an employee is confirmed to have COVID-19 infection, employers should inform fellow employees of their possible exposure to COVID-19 in the workplace but maintain confidentiality as required by the Americans with Disabilities Act (ADA). The employer should instruct fellow employees about how to proceed based on the CDC Public Health Recommendations for Community-Related Exposure.

### 2.1.1 Procedures for COVID-19 Safety Plan Review

The WWU Project Manager (PM) or Construction Manager (CM) requests from PBS the review of current or pending Plan from project stakeholders. Review and transmittal of comments by the Consultant are to proceed as a standard project submittal review. Information may be provided to the Consultant via the WWU PM or CM, or via a Project Architect or Engineer. As with all project submittals, any information provided by Sub-Contractors should undergo a thorough review by project General Contractors prior to being submitted for review to the WWU project team.
Review comments from are transmitted in the typical format for project submittals via chains-of-communication established for the specific project on a case-by-case basis. This process continues until all comments have been properly addressed by the contractor and no further exceptions to the information provided remain. Following receipt of an acceptable Plan from the contractor, the document should be processed, filed and distributed as appropriate and used by PBS in review of site operations for compliance with the COVID-19 safety requirements.

The contractors shall submit for review by PBS JHAs for all work considered medium and high risk. JHAs shall be reviewed by PBS prior to the commencement of work associated with the JHA.

3 COVID-19 SITE OBSERVATION AND DOCUMENTATION
To ensure the proper implementation of the COVID-19 safety requirements on active construction projects, the University has authorized PBS to periodic site visits to observe and document construction site activity for general compliance with the applicable jobsite requirements issued by the Governor’s Office and the COVID-19 Safety Plan in-place.

PBS site visits include observations related to:

- Types of work being performed, including approximate crew sizes, tools/equipment, and locations
- General site layout and hygiene – dust control, airflow, engineering controls, etc.
- Interactions between crew members – Communication procedures and cooperative work practices in use
- Distancing practices – General information on the effectiveness of crew members maintaining 6 feet of separation
- Personal hygiene and sanitation – Frequency and types (e.g. hand washing, sanitizer, etc.)
- Use of PPE
- Implementation of other components of the Plan for any given firm with employees working on the project site

Observations made by PBS are be considered as supplemental to the obligations of the contractors working on the project site and are intended to assist the project team with maintaining a healthy and safe project site. It is not the sole responsibility of PBS to document potential deficiencies. Site inspections by PBS do not alleviate the contractors with employees on the project site of their responsibilities pertaining to COVID-19 or any other contractual or regulatory obligations.

Site observation reports are submitted to the project team. Deficiencies identified are to be addressed by the contractor. PBS follows-up on the deficiencies during the next site visit.