

COVID-19 Prevention & Response Plan



INTRODUCTION

As the COVID-19 pandemic continues to evolve, Pepper Construction has developed the following Prevention & Response Plan to communicate with our team members, clients, trade partners and vendors. Pepper has established a COVID-19 Response Team to monitor and address the most recent developments to this situation.

Your safety is always our top priority. The COVID-19 outbreak has changed our day-to-day operations on both our jobsites and in our offices. Detailed protocols are now in place to protect and minimize the impact on Pepper, our employees, clients, subcontractors, the general public and on-site visitors.

Everyone working for and with our company is required to follow CDC and Public Health Department guidelines for day to day operations and travel. Jobsites and offices have been equipped with hand washing stations, hand sanitizer, enhanced cleaning protocols and everyone is screened for temperatures before entry. In-person meetings have largely moved to conferencing software with exception of daily huddles which now require appropriate physical distancing. Guidelines are also in place to communicate and protect against the spread of the disease should anyone on site receive a positive diagnosis.

Because the situation changes frequently, our plan will evolve as well. The COVID-19 Response Team is continuously monitoring this situation and updates from the CDC and Local Health Departments and will update this living document as warranted. The plan was most recently updated on January 03, 2022 and **changes from the previous plan dated August 11, 2021 are highlighted in yellow. Note significant changes to isolation and quarantine on pages 6 and 7.** Pepper will continue to notify appropriate parties of any changes to the protocol as they are made.

Should you have any questions, concerns or ideas to make this plan better, please contact **Shannan Ghera**, Vice President of Communications, at 847-347-0129 or sghera@pepperconstruction.com.

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Plan for Jobsites and Field Offices

To minimize the risk of COVID-19, Pepper has enacted the following project guidelines based on CDC and State Health Department guidelines:

Basic Health and Hygiene

- + Anyone who is sick must stay home.
 - + Per State Health Department guidelines, anyone clearly sick will be removed from the jobsite and may not return to a Pepper jobsite until they are fever-free for 24 hours without fever-reducing medication and other symptoms have improved. Employers will be advised shall this occur.
 - + Wash your hands often with soap and water for at least 20 seconds. If soap and water are not available, use hand sanitizer with a minimum of 60% alcohol.
 - + Cover your mouth with a tissue if you cough or sneeze – then immediately dispose of the tissue and wash your hands.
 - + Avoid close contact with people who are sick. Close contact is defined as within 6 feet for an aggregate of 15 minutes over the course of 24 hours.
 - + [Refer to Daily Infection Control Checklist](#)
-

Cleaning and Disinfecting

- + Project teams shall have jobsite trailers wiped down regularly with disinfectant (including surfaces like desks and tables and objects like telephones and keyboards) and wipe down tools, door handles, washroom doors and elevators nightly.
- + Project teams shall ensure all crews, including trade partners crews, disinfect tools and equipment.
- + Project teams will rent and install hand washing stations on projects without running water.
- + [Refer to the Cleaning and Disinfecting Guidelines Checklist](#)

Physical Distancing

- + All site personnel must maintain a distance of 6 feet apart, per CDC guidelines.
Limit elevator and personnel hoist capacity so that occupants and the operator can maintain proper social distancing of at least 6'. Post signage to remind teams to stand 6 feet or more apart at all times.
 - + Stagger jobsite start times when possible so elevators/hoists, lunches and break times are less populated.
 - + Where possible, create a designated break area or areas that allow for social distancing.
 - + It is best practice for jobsite meetings to be performed in a manner that maintains 6' spacing for all attendees. If social distancing cannot be maintained, the meeting must not be held. Options include:
 - + Meeting outside
 - + Moving meetings from the office/trailer to another room in the building that is large enough to maintain social distancing
 - + Conference call
 - + Splitting the meeting into smaller groups
 - + [Refer to the Physical Distancing Guidelines](#)
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Face Coverings

- + This project requires everyone on site to wear a face covering indoors at all times.
This applies to the jobsite office as well.

Work Site Entry and Temperature Guidelines

- + Upon request, Pepper can monitor temperatures on site. This assessment will take place outside of the site entrance.
- + [Refer to Worksite Entry and Temperature Guidelines](#)

Site Communications

- + CDC/WHO health and safety posters are to be posted in visible areas on every Pepper jobsite.
 - + Signage for physical distancing, temperature monitoring, and 5 simple steps to stay healthy are to be posted in appropriate areas throughout the site.
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Travel Guidelines

- + Any team member, including Trade Partner employees, who travels outside of the U.S. shall advise their supervisor before traveling. Per CDC guidelines everyone must follow state, territorial, tribal and local recommendations after travel.
<https://www.cdc.gov/coronavirus/2019-ncov/travelers/travel-during-covid19.html>.
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Illness/ Exposure / Potential Exposure Guidelines

- + Anyone who becomes sick with an acute respiratory illness suspected to be COVID-19 should not come to work. Call your doctor immediately and follow CDC and State Health Department guidelines. Trade Partners shall immediately notify their Pepper Superintendent if anyone on their team becomes sick with a respiratory illness suspected to be COVID-19. The Superintendent will convey the information to Pepper Safety.
- + Trade Partners are to report to their Pepper Superintendent any team member who tests positive for COVID-19, or any team member who has been exposed to an individual who tests positive, within two weeks of working on a Pepper jobsite. The Superintendent will convey the information to Pepper Safety.
- + Per CDC guidelines - Anyone who tested positive must isolate at home **AND** do not come to work for 5 days or longer if symptoms persist. Upon ending isolation, team members must wear a mask at all times for an additional 5 days after ending isolation.*

**If you have a fever, continue to stay home until your fever resolves.*

(Cont.)

Illness/ Exposure / Potential Exposure Guidelines (Cont.)

- + Per CDC guidelines any team member who has been boosted **OR** has completed the primary series of Pfizer or Moderna vaccine within the last 6 months **OR** has completed the primary series of J&J vaccine within the last 2 months **AND** is determined to have been in close contact* of someone with suspected or confirmed COVID-19 shall immediately wear a mask in public indoor settings for 10 days**. Test on day 5, if possible.

**The CDC defines close contact as being within 6' of an infected person for a total of 15 minutes or more over a 24-hour period.*

****If at any time you develop symptoms, get a test and stay home.**

- + Per CDC guidelines any team member who is unvaccinated **OR** who is more than 6 months out of their second mRNA dose **OR** more than 2 months out from their J&J dose **AND** are not yet boosted and who is determined to have been in close contact* of someone who then since tested positive for COVID-19 shall quarantine for 5 days at home**, followed by strict mask use for an additional 5 days. Test on day 5, if possible.

- + As appropriate, send notification to Client, Building, Subcontractors, Vendors and other Partners. Notification shall include:
 - + Project status and the date the sick person was last on site
 - + Locations/areas occupied by the sick person
 - + Confirmation of notification of others per CDC close contact definition
- + When requested by a client, proof of vaccination will be required to enter the owner's site. Should the client request proof of vaccination, a vaccination card or a copy of your vaccination record shall be provided as outlined by the client's reporting instructions.

Cleaning and Disinfecting

- + If more than 7 days since the person who is sick was onsite or in an area of the site, additional cleaning and disinfection is not necessary.
- + Routine cleaning and disinfecting
 - + Project teams should practice routine cleaning and disinfecting of frequently touched surfaces in the project office, trailer and jobsite. Frequently touched surfaces include desks, tables, telephones, keyboards, door handles, light switches, elevator buttons, toilets, faucets, sinks, etc.
 - + Project teams shall ensure all crews, including trade partners crews, disinfect tools and equipment at least daily.
 - + Carpeting shall be vacuumed
- + Cleaning and disinfecting if someone is sick
 - + Close off areas used by the person who is sick
 - + Open doors and windows to increase air circulation in the area
 - + Wait 24 hours before cleaning and disinfecting. If 24 hours is not feasible, wait as long as possible.
 - + Clean and disinfect all areas used by the person who is sick. Vacuum carpet and wipe all frequently touched surfaces such as desks, tables, telephones, keyboards, door handles, light switches, elevator buttons, toilets, faucets, sinks, etc.
 - + Clean and disinfect all tools and equipment used by the person who is sick.
- + Project teams will leverage 365 Equipment & Supply for the availability of tissues, closed trash receptacles and hand sanitizer.
- + Project teams will rent and install hand washing stations on projects without running water.
- + Always read and follow the direction on the label of cleaning and disinfecting products.
- + [CDC Cleaning and Disinfecting Guidelines](#)

Daily Infection Control Checklist

This form may be used to assess the health of each crew. Ensure all crew members are present to complete this checklist. For Superintendents and Foremen only, signatures by individual crew members are not needed.

Project Information

Project Name:		Company Name:	
Crew Supervisor Name and Sig:		Date:	

Important Guidance / Reminders

- + Stay at home if you feel sick
- + Wash and/or sanitize hands frequently and avoid touching eyes, nose and mouth
- + All team members must wear face covering at all times while working in an interior space and unable to social distance, regardless of individual vaccination status.
This guidance applies whether you are working on the jobsite, in an office or in a trailer.
- + Do not share PPE or tools and keep work carts, break table and areas clean
- + Advise crew members to stay or go home if they feel sick
- + Avoid gatherings of people and refrain from shaking hands
- + Regularly clean tools, work areas and equipment

Physical Distancing Guidelines

The purpose of this guideline is to reduce/eliminate close contact with other workers on our jobsites. For the purpose of this guideline, close contact is defined per CDC guidelines as work **within 6 feet** of other workers spanning more than 15 minutes within a 24-hour period, regardless of individual vaccination status. If tasks prevent physical distancing, consider getting creative to find alternative workflows, explore assistive equipment or rething processes.

Collaboration, Documentation and Training

+ Task planning and coordination

- + Meetings shall be held regularly (e.g. daily) to coordinate work between all contractors on site and within individual work crews in a way that will promote the reduction of close contact between workers.

+ Breaks

- + Crews members must not be in close contact during breaks. If necessary, break times shall be staggered, additional break areas shall be created, or breaks shall be taken outside.
- + If allowed, breaks can be taken in work areas to allow for proper spacing.
- + Shanties or dividers/barricades shall be erected if necessary.

+ Jobsite logistics

- + All trade gang boxes shall be separated by at least 6 feet.
- + Elevator and personnel hoist use:
 - + If elevators or other personnel hoists are utilized, the maximum number of occupants shall be determined to achieve proper spacing. The hoist or elevator operator shall enforce the maximum number of occupants.
 - + The use of stairwells shall be promoted.
 - + Staggered start times may be required to reduce the number of workers entering the site at the same time.
- + Where possible, provide multiple points of access to limit the proximity of workers as they arrive and leave the site.

+ Shift schedule

- + In addition to staggered start times, multiple shifts may be necessary to achieve proper spacing of workers.

+ Meetings, orientations, training, etc.

- + All meetings shall be held either via teleconference or in a space that allows proper spacing.
- + All safety lunches or project milestone celebrations must be postponed indefinitely until further notice.

Communication

- + Postings (signs, posters) shall be placed throughout the project to educate and remind workers about proper spacing.
-

Related Precautions to be Taken

- + Make every effort to NOT share tools. Tools shall be disinfected if shared and at the beginning of each shift.
 - + Bottled water only. No shared water coolers allowed until further notice.
 - + Continue to follow CDC personal hygiene protocols for hand washing and face touching.
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Examples of Alternate Task Procedures

- + Installing drywall and other sheet goods
 - + Use equipment to assist with lifting and moving the material.
 - + Have workers at least 6' from each other by holding the ends of the material.
 - + Cut materials into smaller, more manageable sizes to allow one worker to lift and install the material.
- + Moving materials
 - + Use a pallet jack and have one employee pull the handles while the other pushes from the other end.
 - + If large enough, have one worker on each end of the material.
 - + Use equipment to lift and move materials.
- + Installing materials on boom lifts, scissor lifts and/or narrow frame rolling scaffolds, such as Baker or Perry lifts.
 - + Use a second lift or scaffold instead of both workers being on the same piece of equipment.

Cleaning and Disinfecting Guidelines -use when necessary

Courtesy of the CDC

How to Clean and Disinfect// Cleaning

- + Wear disposable gloves to clean and disinfect.
- + Clean surfaces using soap and water, then use disinfectant.
- + Cleaning with soap and water reduces number of germs, dirt and impurities on the surface. Disinfecting kills germs on surfaces.
- + Practice routine cleaning of frequently touched surfaces.
 - + More frequent cleaning and disinfection may be required based on level of use.
 - + High touch surfaces include:

Tables, doorknobs, light switches, countertops, handles, desks, phones, keyboards, toilets, faucets, sinks, etc.

How to Clean and Disinfect // Disinfecting

- + Follow the instructions on the label to ensure safe and effective use of the product.
- + Many products recommend:
 - + Keeping surface wet for a period of time (see product label).
 - + Precautions such as wearing gloves and making sure you have good ventilation during use of the product.

Always read and follow the directions on the label to ensure safe and effective use.

- + Wear skin protection and consider eye protection for potential splash hazards
- + Ensure adequate ventilation
- + Use no more than the amount recommended on the label
- + Use water at room temperature for dilution (unless stated otherwise on the label)
- + Avoid mixing chemical products
- + Label diluted cleaning solutions
- + Store and use chemicals out of the reach of children and pets
- + **You should never eat, drink, breathe or inject these products into your body or apply directly to your skin as they can cause serious harm. Do not wipe or bathe pets with these products or any other products that are not approved for animal use.**
- + [See EPA's 6 steps for Safe and Effective Disinfectant Use.](#)
- + Diluted household bleach solutions may also be used if appropriate for the surface.
 - + Check the label to see if your bleach is intended for disinfection and has a sodium hypochlorite concentration of 5%–6%. Ensure the product is not past its expiration date. Some bleaches, such as those designed for safe use on colored clothing or for whitening may not be suitable for disinfection.
 - + Unexpired household bleach will be effective against coronaviruses when properly diluted.
 - + **Follow manufacturer's instructions** for application and proper ventilation. Never mix household bleach with ammonia or any other cleanser.
 - + **Leave solution** on the surface for **at least 1 minute.**
 - + To make a bleach solution, mix:
 - 5 tablespoons (1/3rd cup) bleach per gallon of room temperature water
 - OR
 - 4 teaspoons bleach per quart of room temperature water
 - + Bleach solutions will be effective for disinfection up to 24 hours.
 - + **Alcohol solutions with at least 70% alcohol may also be used.**

Soft Surfaces //

For soft surfaces such as carpeted floor, rugs, and drapes:

- + Clean the surface using soap and water or with cleaners appropriate for use on these surfaces.
- + Launder items (if possible) according to the manufacturer's instructions. Use the warmest appropriate water setting and dry items completely.

OR

- + Disinfect with an EPA-registered household disinfectant. [These disinfectants meet EPA's criteria for use against COVID-19.](#)
- + Vacuum as usual.

Electronics //

For electronics, such as tablets, touch screens, keyboards, remote controls, and ATM machines

- + Consider putting a wipeable cover on electronics.
- + Follow manufacturer's instruction for cleaning and disinfecting.
 - + If no guidance, use alcohol-based wipes or sprays containing at least 70% alcohol. Dry surface thoroughly.

Laundry //

For clothing, towels, linens and other items

- + Launder items according to the manufacturer's instructions. Use the warmest appropriate water setting and dry items completely.
- + Wear disposable gloves when handling dirty laundry from a person who is sick.
- + Dirty laundry from a person who is sick can be washed with other people's items.
- + Do not shake dirty laundry.
- + Clean and disinfect clothes hampers according to guidance above for surfaces.
- + Remove gloves, and wash hands right away.

Cleaning and disinfecting your building or facility if someone is sick

- + Close off areas used by the person who is sick.
 - + Companies do not necessarily need to close operations, if they can close off affected areas.
- + Open outside doors and windows to increase air circulation in the area.
- + Wait 24 hours before you clean or disinfect. If 24 hours is not feasible, wait as long as possible.
- + Clean and disinfect all areas used by the person who is sick, such as offices, bathrooms, common areas, shared electronic equipment like tablets, touch screens, keyboards, remote controls, and ATM machines.
- + Vacuum the space if needed. Use vacuum equipped with high-efficiency particulate air (HEPA) filter, if available.
 - + Do not vacuum a room or space that has people in it. Wait until the room or space is empty to vacuum, such as at night, for common spaces, or during the day for private rooms.
 - + Consider temporarily turning off room fans and the central HVAC system that services the room or space, so that particles that escape from vacuuming will not circulate throughout the facility.
- + Once area has been appropriately disinfected, it can be opened for use.
 - + Workers without close contact with the person who is sick can return to work immediately after disinfection.
- + If more than 7 days since the person who is sick visited or used the facility, additional cleaning and disinfection is not necessary.
 - + Continue routine cleaning and disinfection. This includes everyday practices that businesses and communities normally use to maintain a healthy environment.

Cleaning and disinfecting outdoor areas

- + Outdoor areas, like playgrounds in schools and parks generally require normal routine cleaning, but do not require disinfection.
 - + Do not spray disinfectant on outdoor playgrounds- it is not an efficient use of supplies and is not proven to reduce risk of COVID-19 to the public.
 - + High touch surfaces made of plastic or metal, such as grab bars and railings should be cleaned routinely.

Cleaning and disinfecting outdoor areas (cont'd)

- + Cleaning and disinfection of wooden surfaces (play structures, benches, tables) or groundcovers (mulch, sand) is not recommended.
- + Sidewalks and roads should not be disinfected.
 - + Spread of COVID-19 from these surfaces is very low and disinfection is not effective.

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When Cleaning

- + Regular cleaning staff can clean and disinfect community spaces.
 - + Ensure they are trained on appropriate use of cleaning and disinfection chemicals.
- + Wear disposable gloves and gowns for all tasks in the cleaning process, including handling trash.
 - + Additional personal protective equipment (PPE) might be required based on the cleaning/disinfectant products being used and whether there is a risk of splash.

Gloves and gowns should be removed carefully to avoid contamination of the wearer and the surrounding area.
- + Wash your hands often with soap and water for 20 seconds.
 - + Always wash immediately after removing gloves and after contact with a person who is sick.
 - + Hand sanitizer: If soap and water are not available and hands are not visibly dirty, an alcohol-based hand sanitizer that contains at least 60% alcohol may be used. However, if hands are visibly dirty, always wash hands with soap and water.
- + Always read and follow the directions on the label to ensure safe and effective use.
 - + Keep hand sanitizers away from fire or flame

When Cleaning (cont'd)

- + For children under six years of age, hand sanitizer should be used with adult supervision
- + Always store hand sanitizer out of reach of children and pets
- + See [CDC's Hand Sanitizer Use Considerations](#)
- + Additional key times to wash hands include:
 - + After blowing one's nose, coughing, or sneezing.
 - + After using the restroom.
 - + Before eating or preparing food.
 - + After contact with animals or pets.
 - + Before and after providing routine care for another person.
- + Content source: [National Center for Immunization and Respiratory Diseases \(NCIRD\), Division of Viral Diseases](#)

Worksite Entry Temperature Guidelines

As part of Pepper's continued commitment to worker health and safety during the COVID-19 pandemic, we have implemented temperature scanning procedures at selected work sites, at the client's request. Since the presence of a fever is a primary symptom of COVID-19, temperature screening is performed to assess potential infection and minimize the spread of the virus. If requested, we will screen all tradespeople, visitors, suppliers, vendors, Pepper team members and any other person who enters the jobsite that is contractually associated with the project as they arrive for work at the job site first thing in the morning.

Communication

- + Prior to beginning this protocol please discuss and receive approval from your Business Unit Leader.
- + Prior to beginning the scanning procedures at each project, the Pepper Project Manager will communicate with Trade Partner Principals to explain the scanning process. Trade Partner Principals shall inform their employees on Pepper sites that screening will be performed and will be required.
- + On Site Communication will include the following points:
 - + Everyone will be required to participate in the screening. No person will be allowed on site without proper screening.
 - + The absence of a fever does not necessarily indicate the person does not have the virus, other symptoms such as a cough or difficulty breathing are also symptoms of COVID-19 and anyone with these symptoms shall stay at home or will be sent home.
 - + Explain the purpose of the screening as explained above.
 - + Explain that everyone's privacy will be protected and records will not be kept.
 - + Explain the screening process so the individual understands what to expect.
 - + Limit morning coffee drinking so not to affect test results.

Communication (cont'd)

- + Signage indicating that body temperature screening is taking place shall be posted at all jobsite entrances.
 - + If an individual resists, acknowledge their perspective and remind them that we must do this to do our part to protect everyone. For example, "I understand your point of view AND I cannot let you on site without taking your temperature. We are a team, and we must do everything we can do to protect each other."
-

Project Logistics

- + Limit access to the site
 - + Jobsite access shall be limited to a single screening points so everyone is screened prior to entering general work areas.
 - + Social distancing
 - + Choose locations for screening where social distancing can be achieved (people not standing in line within 6 feet of each other or in an unorganized manner in a "holding room").
 - + Choose locations where the screening can be held in private so other people are unable to see or hear temperature reading results.
-

Documentation

- + Do not record or otherwise keep track of individual temperature results. We can record and document which persons are sent home due to a fever, but such information must be marked and remain confidential and shared only on a need-to-know basis.
 - + After all persons have completed the screening they must sign into the job.
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Screening Options

a. 3rd Party Administrator Screening

- + Pepper or the Owner will hire a 3rd party firm to conduct the screening and they will adhere to the Pepper specific protocol. See separate attachment for pre-approved vendors. If the vendor supplies the thermometers, they are responsible to follow the thermometer manual instructions.

b. Self-administered Screening

- + Daily temperature screenings will be self-administered with guidance from the Pepper site supervisor. In addition to the steps described in this plan, the following steps will be taken:
- + Regardless of vaccination status, the Pepper supervisor shall maintain a distance of at least 6' from the screening area at all times.

Screening Options (cont'd)

- + The person administering the self-screen will screen themselves and show the results.
- + The person will then place the thermometer back on the surface they obtained it from.
- + The Pepper supervisor, while wearing latex gloves, will then disinfect the thermometer and, regardless of vaccination status, stand at least 6' from the screening area and allow the next person in line approach the screening area.

If Temperature Measuring Device Provided by Pepper

- + The thermometer must be in a room with similar temperature as the room in which the screens will take place for at least 30 minutes prior to using it.
- + Ensure the thermometer is in "body" mode.
- + Ensure the person's forehead is dry and not recently covered by a hat, cap or hardhat.
- + The device must be held within 2" of the person's forehead
- + The thermometer must align with the center of the forehead, above the eyebrows.
- + Wait at least 2 seconds between measurements.
- + To ensure the accuracy of the measurements, wait at least 30 seconds after 5 consecutive measurements.
- + Refer to the user manual for further use and care instructions.

Handling Personnel with Fevers ($\geq 100.4^{\circ}\text{F}$)

- + If a person's result is 100.4°F or above, wait at least 5 seconds and perform the scan again. If the result is again 100.4°F or above, the person must not be allowed on the jobsite.
- + Be discrete. Avoid pulling the person aside or out of line. Discuss the results of temperature scan results only where others cannot see or overhear.
- + The person taking the temperature shall write the person's name and employer on the confidential log, but DO NOT record the temperature.
- + If a person fails the screen, advise them to contact their employer and their healthcare provider.
- + Use a disinfectant wipe to disinfect the device after screening a person with a fever.
- + The superintendent shall notify the Project Director if any persons have failed and the Project Director will contact the person's employer.
- + Anyone who fails the test may not return to a Pepper jobsite until they are fever-free for 72 hours. The person's employer must notify the Project Director in advance of this person returning.

Specific Jobsite Logistics

- + Additional project logistics specific to each project location will be attached as a supplement when distributed to the Prime Trade Contractors.

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Version 01.03.2022

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