

Document Summary			
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COVID-19 Prevention Procedures (CPP) for: Dragados Flatiron JV (DFJV)

This CPP is designed to control employees' exposures to the SARS-CoV-2 virus (severe acute respiratory syndrome coronavirus 2) that causes COVID-19 (Coronavirus Disease 2019) that may occur in our workplace.

Date: July 24, 2023

Authority and Responsibility

DFJV Safety and Security Manager has overall authority and responsibility for implementing the provisions of this CPP in our workplace. In addition, all managers and supervisors are responsible for implementing and maintaining the CPP in their assigned work areas and for ensuring employees receive answers to questions about the procedures in a language they understand.

All employees are responsible for using safe work practices, following all directives, policies, and procedures, and assisting in maintaining a safe work environment.

Application of the DFJV Injury & Illness Prevention Program (IIPP)

COVID-19 is a recognized hazard in our workplace that is addressed through our IIPP, which will be effectively implemented and maintained to ensure the following:

1. When determining measures to prevent COVID-19 transmission and identifying and correcting COVID-19 hazards in our workplace:
 - a. All persons in our workplace are treated as potentially infectious, regardless of symptoms, vaccination status, or negative COVID-19 test results.
 - b. COVID-19 is treated as an airborne infectious disease. Applicable State of California and County Health Department orders and guidance will be reviewed when determining measures to prevent transmission and identifying and correcting COVID-19 hazards. COVID-19 prevention controls include:
 - i. Remote work.
 - ii. Physical distancing.
 - iii. Reducing population density indoors.
 - iv. Moving indoor tasks outside.
 - v. Implementing separate shifts and/or break times.
 - vi. Restricting access to work areas.

2. Training and instruction on COVID-19 prevention is provided:
 - a. When this CPP was first established.
 - b. To new employees.
 - c. To employees given a new job assignment involving COVID-19 hazards and they have not been previously trained.
 - d. Whenever new COVID-19 hazards are introduced.
 - e. When we are made aware of new or previously unrecognized COVID-19 hazards.
 - f. For supervisors to familiarize themselves with the COVID-19 hazards to which employees under their immediate direction and control may be exposed.
3. Procedures to investigate COVID-19 illnesses at the workplace include:
 - a. Determining the day and time a COVID-19 case was last present; the date of the positive COVID-19 tests or diagnosis; and the date the COVID-19 case first had one or more COVID-19 symptoms. Appendix B Investigating COVID-19 Cases will be used to document this information.
 - b. Effectively identifying and responding to persons with COVID-19 symptoms at the workplace.
 - DFJV safety will partner with all project employees to contact the **DFJV Covid Phone Number and report any symptoms or sickness. Covid Line – 559-758-2411**
 - Any employees with Covid-19 symptoms will call the DFJV contact tracer and the information will be entered in the **DFJV Covid Tracker. (See Appendix A)**
 - c. Encouraging employees to report COVID-19 symptoms and to stay home when ill.

Suspect Case – Symptomatic or Person Under Investigation

If an employee presents with symptoms (fever, cough, or shortness of breath) AND has either had contact with a person confirmed or suspected to have infection with COVID-19 within the last 14 days OR is placed under medical investigation specifically seeking to positively diagnose or rule out COVID-19, that employee (Suspect Case) is immediately **requested** to remain at home, regardless of vaccination status.

If a COVID-19 test is ordered by a health care provider, employee shall not be allowed to return to the work environment until the test results have returned confirming a negative result and clinician confirms ability to return to work.

Safety Managers and Human Resources shall maintain and provide up to date guidance on known locations where COVID-19 testing is available.

Human Resources will need to be involved in the leave process and accommodations process; this isn't necessarily the sole decision of the supervisor.

HR and Safety will determine other people who have been in close contact with workplace Suspect Case and will notify any Contacts (individuals who have been in close contact with a Suspect Case). HR and Safety shall document their findings using the COVID-19 Case Tracking Sheet.

Contacts shall be advised that:

- they should seek advice from a medical professional.
- if they experience any symptoms, they should stay home and notify a health care professional and their supervisor.
- they will remain informed by the company about the status of the Suspect Case

The HR and Safety Professional shall monitor the medical status of the Suspect Case and notify Close Contacts of any change in status such as escalation to a confirmed case, or de-escalation to a confirmed negative.

Suspect Case employees must follow medical advice for self-isolation.

4. Effective procedures for responding to COVID-19 cases at the workplace include:

Table 1: Exclusion Requirements for Employees Who Test Positive for COVID-19

Requirements apply to all employees, regardless of vaccination status, previous infection, or lack of symptoms.	<ul style="list-style-type: none"> Employees who test positive for COVID-19 must be excluded from the workplace for at least 5 days after start of symptoms or after date of first positive test if no symptoms. Isolation can end and employees may return to the workplace after day 5 if symptoms are not present or are mild and resolving; AND the employee is fever-free for 24 hours without the use of a fever-reducing medication. If an employee has a fever, isolation must continue, and the employee may not return to work until 24 hours after the fever resolves. If an employee's symptoms other than fever are not improving, they may not return to work until their symptoms are resolving or until after day 10. Employees must wear face coverings around others for a total of 10 days.
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Table 2: CDPH Guidance for Close Contacts

Asymptomatic Persons Who are Exposed to Someone with COVID-19 (No Quarantine)	<ul style="list-style-type: none"> Test within 3–5 days after last exposure. Close contacts should wear a well-fitting mask around others for a total of 10 days, especially in indoor settings and when near those at higher risk for severe COVID-19 disease. Strongly encouraged to get vaccinated or boosted. If symptoms develop, test, and stay home, AND If test result is positive, follow isolation recommendations above (Table 1).
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- If an order to isolate, quarantine, or exclude an employee is issued by a local or state health official, the employee will not return to work until the period of isolation or quarantine is completed or the order is lifted.
- If removal of an employee would create undue risk to a community's health, DFJV may submit a request for a waiver to Cal/OSHA in writing to rs@dir.ca.gov to allow employees to return to work if it does not violate local or state health official orders for isolation, quarantine, or exclusion:
 - We will work with Cal OSHA to determine the best course depending on the circumstances.***
- Upon excluding an employee from the workplace based on COVID-19 or a close contact, **DFJV** will provide excluded employees information regarding COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws. This includes any benefits available under legally mandated sick leave, workers' compensation law, local governmental requirements, and DFJV leave policies and leave guaranteed by contract:
- Human Resources is available to answer employee questions regarding Sick Leave, Family and Medical Leave (FMLA), Dependent Care or any other employment policy issues.***

Testing of Close Contacts

COVID-19 tests are available at no cost, during paid time, to all our employees who have had a close contact in the workplace. These employees will be provided with the information as requested by DFJV HR and/or Safety.

Exceptions are returned cases as defined in CCR, Title 8, section 3205(b)(11).

Notice of COVID-19 cases

Employees and independent contractors who had a close contact, as well as any employer with an employee who had a close contact, will be notified as soon as possible, and in no case longer than the time required to ensure that the exclusion requirements of paragraph (4)(a) above, are met.

When Labor Code section 6409.6 or any successor law is in effect (effective till 1/1/2024), **DFJV** will:

- Provide notice of a COVID-19 case, in a form readily understandable to employees. The notice will be given to all employees, employers, and independent contractors at the worksite.
- Provide the notice to the authorized representative, if any of:
 - The COVID-19 case and of any employee who had a close contact.
 - All employees on the premises at the same worksite as the COVID-19 case within the infectious period:
 - ***DFJV Safety will provide notification in the form of a Potential Exposure Notification Letter to all affected project employees.***

Face Coverings

Employees will be provided face coverings and required to wear them:

- When required by orders from the CDPH. This includes spaces within vehicles when a CDPH regulation or order requires face coverings indoors.
- During outbreaks and major outbreaks.
- When employees return to work after having COVID-19 until 10 days have passed since the date that COVID-19 symptoms began or, if the person did not have COVID-19 symptoms, from the date of their first positive COVID-19 test, or after a close contact. Please refer to the section on CDPH's Isolation and Quarantine Guidance.

Face coverings will be clean, undamaged, and worn over the nose and mouth.

The following exceptions apply:

1. When an employee is alone in a room or vehicle.
2. While eating or drinking at the workplace, provided employees are at least six feet apart and, if indoors, the supply of outside or filtered air has been maximized to the extent feasible.
3. While employees are wearing respirators required by the employer and used in compliance with CCR, Title 8 section 5144.
4. Employees who cannot wear face coverings due to a medical or mental health condition or disability, or who are hearing-impaired or communicating with a hearing-impaired person. Such employees shall wear an effective non-restrictive alternative, such as a face shield with a drape on the bottom, if the condition or disability permits it.
5. During specific tasks which cannot feasibly be performed with a face covering. This exception is limited to the time period in which such tasks are actually being performed.

If an employee is not wearing a face covering due to exceptions (4) and (5), above, the COVID-19 hazards will be assessed, and action taken as necessary.

Employees will not be prevented from wearing a face covering, including a respirator, when not

required by this section, unless it creates a safety hazard.

Respirators

Respirators will be provided for voluntary use to employees who request them and who are working indoors or in vehicles with more than one person. Employees who request respirators for voluntary use will be:

- Encouraged to use them.
- Provided with a respirator of the correct size.
- Trained on:
 - How to properly wear the respirator provided.
 - How to perform a user seal check according to the manufacturer's instructions each time a respirator is worn.
 - The fact that facial hair interferes with a seal.

The requirements of CCR, Title 8 section 5144(c)(2) will be complied with according to the type of respirator (disposable filtering face piece or elastomeric re-usable) provided to employees.

Ventilation

For our indoor workplaces we will:

- Review CDPH and Cal/OSHA guidance regarding ventilation, including the CDPH [**Interim Guidance for Ventilation, Filtration, and Air Quality in Indoor Environments**](#). DFJV will develop, implement, and maintain effective methods to prevent transmission of COVID-19, including one or more of the following actions to improve ventilation:
 - Maximize the supply of outside air to the extent feasible, except when the United States Environmental Protection Agency (EPA) Air Quality Index is greater than 100 for any pollutant or if opening windows or maximizing outdoor air by other means would cause a hazard to employees, for instance from excessive heat or cold.
 - In buildings and structures with mechanical ventilation, filter circulated air through filters at least as protective as Minimum Efficiency Reporting Value (MERV)-13, or the highest level of filtration efficiency compatible with the existing mechanical ventilation system.
 - Use High Efficiency Particulate Air (HEPA) filtration units in accordance with manufacturers' recommendations in indoor areas occupied by employees for extended periods, where ventilation is inadequate to reduce the risk of COVID-19 transmission.
- Determine if our workplace is subject to CCR, Title 8 section 5142 Mechanically Driven Heating, Ventilating and Air Conditioning (HVAC) Systems to Provide Minimum Building Ventilation, or section 5143 General Requirements of Mechanical Ventilation Systems, and comply as required.

In vehicles, we will maximize the supply of outside air to the extent feasible, except when doing so would cause a hazard to employees or expose them to inclement weather.

COVID-19 Outbreaks

This addendum was added to the DFJV CPP if three or more employee COVID-19 cases within an exposed group visited the workplace during their infectious period at any time during a seven-day period, unless a CDPH regulation or order defines outbreak using a different number of COVID-19 cases and/or a different time period. Reference CCR, Title 8 section 3205.1 for details.

This addendum will stay in effect until there are one or fewer new COVID-19 cases detected in the exposed group for a seven-day period.

Exclude from Work

All COVID-19 cases, as well as employees who had close contacts but do not take a COVID-19 test, will be excluded from the workplace.

COVID-19 Testing

We immediately provide COVID-19 testing available at no cost to our employees within the exposed group, regardless of vaccination status, during employees' paid time, and continue to make test available to employees at least weekly until there are one or fewer new COVID-19 cases detected in the exposed group for a 14-day period.

Employees who had close contacts and remain at work will be required to take a COVID-19 test within three to five days after the close contact and those who test positive for COVID-19 will be excluded. Those who do not take a COVID-19 test will be excluded until our return-to-work requirements have been met.

Face Coverings

Employees in the exposed group, regardless of vaccination status, will wear face coverings when indoors, or when outdoors and less than six feet from another person, unless one of the exceptions in our CPP applies.

Respirators

Employees will be notified of their right to request and receive a respirator for voluntary use, as stipulated in our CPP.

COVID-19 investigation, review, and hazard correction

DFJV will perform a review of potentially relevant COVID-19 policies, procedures and controls, and implement changes as needed to prevent further spread of COVID-19 when this addendum initially applies and periodically thereafter. The investigation, review, and changes will be documented and include:

- Investigation of new or unabated COVID-19 hazards including:
 - Our leave policies and practices and whether employees are discouraged from remaining home when sick.
 - Our COVID-19 testing policies.
 - Insufficient supply of outdoor air to indoor workplaces.
 - Insufficient air filtration.
 - Insufficient physical distancing.

- Review updated every 30 days that CCR, Title 8 section 3205.1 continues to apply:
 - In response to new information or to new or previously unrecognized COVID-19 hazards.
 - When otherwise necessary.
- Any changes implemented to reduce the transmission of COVID-19 based on the investigation and review, which may include:
 - Moving indoor tasks outdoors or having them performed remotely.
 - Increasing the outdoor air supply when work is done indoors.
 - Improving air filtration.
 - Increasing physical distancing to the extent feasible.
 - Requiring respiratory protection in compliance with CCR, Title 8 section 5144.
 - Other applicable controls.

Ventilation

Buildings or structures with mechanical ventilation will have recirculated air filtered with Minimum Efficiency Reporting Value (MERV)-13 or higher efficiency filters, if compatible with the ventilation system. If MERV-13 or higher filters are not compatible with the ventilation system, filters with the highest compatible filtering efficiency will be used. High Efficiency Particulate Air (HEPA) air filtration units will be used in accordance with manufacturers' recommendations in indoor areas occupied by employees for extended periods, where ventilation is inadequate to reduce the risk of COVID-19 transmission.

These ventilation requirements will continue to be implemented after the outbreak has passed and CCR, Title 8 section 3205.1 is no longer applicable.

Major Outbreaks

The following will be done while CCR, Title 8 section 3205.1 applies if 20 or more employee COVID-19 cases in an exposed group visited the worksite during their infectious period within a 30-day period:

- Exclude COVID-19 cases as well as employees in the exposed group who do not take a COVID-19 test.
- Immediately ensure that all employees in the exposed group who remain at work are tested for COVID-19 at least twice weekly until there are one or fewer new COVID-19 cases detected in the exposed group for a 14-day period. Employees in the exposed group that do not take the COVID-19 test will be excluded until our return-to-work criteria have been met.
- Report the outbreak to Cal/OSHA.
- Provide respirators for voluntary use to employees in the exposed group, encourage their use, and train employees according to CCR, Title 8 section 5144(c)(2) requirements.
- Any employees in the exposed group who are not wearing respirators as required will be separated from other persons by at least six feet, except where it can be demonstrated that at least six feet of separation is not feasible, and except for momentary exposure while persons are in movement.

Methods of physical distancing include:

- Telework or other remote work arrangements.
- Reducing the number of people in an area at one time, including visitors.
- Visual cues such as signs and floor markings to indicate where employees and others should be located or their direction and path of travel.
- Staggered arrival, departure, work, and break times.
- Adjusted work processes or procedures, such as reducing production speed, to allow greater distance between employees.

When it is not feasible to maintain a distance of at least six feet, individuals will be as far apart as feasible.

COVID-19 Prevention in Employer-Provided Transportation

[This addendum was added to DFJV CPP because there is employer-provided motor vehicle transportation to and from work, during the course and scope of employment, which is provided, arranged for, or secured by an employer regardless of the travel distance or duration involved. Reference CCR, Title 8 section 3205.3(a) for details and exceptions.]

The requirements of our CPP will be complied with within a vehicle, including how a COVID-19 case will be responded to.

Assignment of transportation

To the extent feasible:

- Transportation will be assigned such that cohorts travel and work together, separate from other workers.
- Employees who usually maintain a household together shall travel together.

Reporting and Recordkeeping

Appendix A: Investigating COVID-19 Cases

All personal identifying information of COVID-19 cases or persons with COVID-19 symptoms, and any employee required medical records will be kept confidential unless disclosure is required or permitted by law. Unredacted information on COVID-19 cases will be provided to the local health department, CDPH, Cal/OSHA, the National Institute for Occupational Safety and Health (NIOSH) immediately upon request, and when required by law.

DFJV Covid-19 Tracker

Open/Closed	Required Quarantine (Y/N)	Employee Name +C:D	Entity (DUSA/Partner /JV/SUB)	Location	Symptoms	Classification	Classification 2	Work Classification	Specific Work Location	Supervisor	Date and Time of last Exposure	
Date First Reported	Date Home	Returned Date	Reason for staying home	Exposure To	Location of Exposure	Exposure Letter Sent	Doctor (Yes/No)	COVID Tested (Yes/No)	Test Results (Positive/ Negative)	Diagnosis	Follow Up	Follow Up

COVID-19 Case Summary

- Date COVID-19 case (suspect or confirmed) became known.
- Date investigation was initiated.
- Summary of employees, independent contractors, and employees of other employers that came in close contact in follow up notes. [CCR Title 8, section 3205 does not require recordkeeping for close contacts. These tables are included to assist DFJV in keeping track of which close contacts they have notified to meet the notice requirements.]
- Summary notice of a COVID-19 case (employees, employers, independent contractors) – during the infectious period and regardless of close contact occurring.