

Supplement No. 1

COVID-19 Guidance: Restarting Construction Projects Versions dated March 30, 2020 and April 24, 2020A

Supplement No. 1 to the *COVID-19 Guidance: Restarting Construction Projects* document provides the following:

- Addresses issues and concerns on the use of masks/face coverings.
- Conveys revisions to the *Governor's April 23, 2020 Construction Guidance* related to the Red, Yellow, and Green Phases of Reopening Pennsylvania.

Masks/Face Coverings

The [Governor's April 23, 2020 Construction Guidance](#) requires every person present at a work site to wear a mask/face covering. The [Pennsylvania Department of Health's Frequently Asked Questions](#) (PaDOH FAQs) have established that a face shield would suffice in lieu of a mask/face covering and indicates that an employee does not need to wear a mask/face covering if it impedes their vision, if they have a medical condition, or if it would create an unsafe condition in which to operate equipment or execute a task.

The [Centers for Disease Control and Prevention \(CDC\) Guidance](#) on masking recommends wearing cloth face coverings where other social distancing measures are difficult to maintain. According to the [PaDOH FAQs](#), the Governor and Secretary of Health have chosen to employ safety measures beyond the CDC. Employees must wear masks at all times except when isolated from others in a private space or when it adversely affects their health.

With the guidance provided above, it is acceptable on PennDOT/PA Turnpike construction projects for an employee to wear a face shield in lieu of a mask/face covering if approved by their employer.

At the beginning of each work day on PennDOT/PA Turnpike construction projects, the Pandemic Safety Officers or their designated representatives responsible for ensuring compliance to their employer's COVID-19 safety plan should have a discussion to review the day's construction activities that will occur on the project and make a determination on the use of masks/face coverings or face shields for those construction activities in accordance with the guidance provided above. After the discussion, the representatives will communicate the determinations made with their fellow employees. According to the [PaDOH FAQs](#), each employer is responsible for taking the necessary steps to implement the Secretary of Health's Order for their own employees.

Protocol 34 – COVID19 – Heat Exposure and Wearing Personal Protection Equipment provides guidance for PennDOT employees on when masks or face shields are to be worn or can be removed to assure the safety and welfare of PennDOT field employees only. Protocol 34 is included as Attachment A with this supplement and is provided for reference. Contractors, Consultants, Producers, and Fabricators may choose to adopt any or all of the guidance at their own discretion.

With regard to mask requirements:

- If revisions to mask requirements as addressed in a Contractor's, Consultant's, Producer's, or Fabricator's accepted Supplemental COVID-19 Safety Plan are proposed, a supplement or letter specifying the company's revisions must be submitted to PennDOT/PA Turnpike for review and acceptance. Submit the supplement/letter in the same manner used for submission of the Supplemental Safety Plan.
- If mask requirements are not addressed in a Contractor's, Consultant's, Producer's, or Fabricator's accepted Supplemental COVID-19 Safety Plan, submit a supplement or letter to PennDOT/PA Turnpike specifying the company's mask requirements. Submit the supplement/letter in the same manner used for submission of the Supplemental Safety Plan.

Red, Yellow, and Green Phases of Reopening

The [Governor's April 23, 2020 Construction Guidance](#) now provides updated requirements related to Red, Yellow, and Green Phases of Reopening. These updated requirements include the following items related to All Construction Activities:

- Ensure all gatherings are limited to no more than 10 people in counties in the red phase of reopening, 25 people in counties in the yellow phase of reopening, and 250 people in counties in the green phase of reopening, maintaining 6-foot social distancing, when required to meet, even when conducted outside.
- Ensure workers are traveling to and from the job site separately. Wherever possible employees should not share a vehicle. For counties in the green phase, workers may share a vehicle to travel to the job site, as long as the vehicle's occupancy is no more than 50% its occupancy load and face masks are worn by the vehicle's occupants.

Attachment A

PROTOCOL 34– COVID19 - HEAT EXPOSURE AND WEARING
PERSONAL PROTECTION EQUIPMENT
REVISION 1 (6-5-2020)

Protocol 34– COVID19 - Heat Exposure and Wearing Personal Protection Equipment

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1. Policy

PennDOT is committed to reducing the hazards associated with potential heat illness when wearing Personal Protection Equipment to perform certain field operations relative to maintenance, construction and/or design work. This protocol provides PennDOT employees with the guidance on when masks or face shields are to be worn or can be removed to assure the safety and welfare of PennDOT field employees.

2. Scope

This protocol applies to all PennDOT employees who perform maintenance, construction or design work outdoors, such as surveyors, operators, flaggers, etc. This protocol is intended to protect workers from potential heat exhaustion and exposure to the COVID19 virus.

3. Applicable Standards

To help prevent the spread of the 2019 Coronavirus (COVID-19), the Governor has ordered that Department of Health (DOH) guidelines and the Center for Disease Control (CDC) recommendations must be followed as part of the Commonwealth's phased reopening plan. These requirements shall continue to be in place through the green phase until such time as the DOH discontinues their required guidelines. Part of these guidelines address the use of face coverings to protect others from individuals who may transmit the virus, even if they show no symptoms (asymptomatic).

The following list includes some related standards; however, it is not all inclusive:

- A. Center for Disease Control and Prevention (CDC)
- B. Environmental Protection Agency (EPA)
- C. Department of Health (DOH)
- D. [Use of Cloth Face Coverings to Help Slow the Spread of COVID-19](#)

4. Roles and Responsibilities

- A. District Executives/Bureau Directors
 - (1) Ensure the proper and timely implementation of this protocol.
 - (2) Ensure all employees are provided adequate resources as outlined in this protocol.
- B. Employee Safety Division
 - (1) Maintain this protocol.
 - (2) Conduct inspections to assist with compliance of this protocol.
 - (3) Respond to employees concerns in a timely matter.
- C. Managers/Supervisors
 - (1) Ensure employees are following the procedures outlined in this protocol.
 - (2) Ensure employees are properly informed about communicable diseases and are provided information and general safe practices helping them to stay healthy and prevent spreading any contagious illness (such as influenza, the common cold etc.)
 - (3) Ensure employees are provided the necessary personal protection equipment and supplies to properly clean their personal protection equipment.
 - (4) Determine unsafe work conditions in accordance with this protocol.
- D. Field Employees
 - (1) Follow the rules and procedures outlined in this protocol
 - (2) Report to the supervisor if other work conditions are identified wherein a mask may impede vision, or if it would create an unsafe condition in which to operate equipment or perform work.

5. Procedures

A. Personal Protection Equipment (Face Coverings):

PennDOT is currently procuring cloth masks, bandanas and/or face shields to be available to employees.

- (1) Employees may choose to provide their own mask, bandana or gaiter.
- (2) Employees may reference the Department of Health or CDC website on how to make a mask.
- (3) All face coverings must represent PennDOT in a positive manner.
- (4) Employees will be responsible for cleaning their own face coverings.
- (5) A face shield is considered an acceptable alternative for employees who work outdoors. See Section D.

NOTE: This protocol is specific to COVID-19 requirements and is not a replacement for specific jobs that require the use of masks as part of their personal protective equipment such as a respirator.

B. Face Coverings for Field Employees:

- (1) Must be worn at all times when performing work activities unless an exemption applies from Section “C” of this protocol.
- (2) Must be worn when in a vehicle/equipment with another individual and when using drive thru services but may be removed when operating the vehicle/equipment alone. Note: A mask/bandana/gaiter must be worn when there are two or more in a vehicle (face shields are not applicable in a vehicle).
- (3) Must be worn when occupying a small room (<100 square feet) with another individual, for any amount of time.

C. Permissible removal of face coverings for field operations:

- (1) All employees must *always* have a face covering on their person for use at a moment’s notice to prevent the spread of the virus when interacting with others.
- (2) Similar to a closed personal office space, PennDOT has deemed when working outdoors, fifteen (15) feet distance from another worker meets the equivalent guidance from DOH; and is also two and half times further than the recommended 6-foot distance indoors to prevent the spread of the virus when interacting with others. (Reference point for 15 feet is the length of a vehicle).
- (3) May be removed by employees directly involved in the application of hot materials (e.g. asphalt).
- (4) May be removed under the direction of a supervisor if it impedes vision, or if it would create an unsafe condition such as effectively communicating with other workers (e.g. crane spotters) in which to operate equipment or perform work.
- (5) May be removed to eat or drink during breaks and lunch periods, however, social distancing techniques must still be applied when within six (6) feet of another individual.
- (6) May be removed when a supervisor determines heat may create an unsafe condition by following the “Preventing Health Related Illness Guidelines”:

Determine the predicted temperature and relative humidity for the day. Reliable sources for obtaining this information include weather.com, wunderground.com. Once the temperature and relative humidity is identified, find the corresponding Wet Bulb Globe Temperature (WBGT) utilizing the chart below.

Temperature °F	Relative Humidity				
	20%	40%	50%	60%	80%
80 °F	56.5	64	67	69	75.1
85 °F	59.9	68	71.2	74	79.9
90 °F	63.3	72.1	75.6	79	84.7
95 °F	66.7	76.1	79.9	83.3	89.5
100 °F	70.2	80.2	84.2	87.8	94.27

If the WBGT is above 77 °F, masks shall not be worn while working to prevent heat related illnesses. Include instructions for preventing heat related illnesses in Safety Talk meetings including if face mask use may cause a safety hazard or if extra breaks will need to be taken. Red on this chart indicates wearing a mask may cause harm.

Examples:

Example 1: If the predicted high temperature for the day will be 85 °F and the relative humidity will be 60% then look to the chart to find the WBGT.

WBGT = 74 °F

Because this is less than 77 °F no adjustments need to be made.

74°F < 77 °F

Example 2: If the predicted high temperature for the day will be 95 °F and the relative humidity will be 50% then look to the chart to find the WBGT.

WBGT = 79.9 °F

Because this is more than the 77 °F adjustments need to be made. Because it would be considered a safety hazard, a face mask will not be required.

79.9 °F > 77 °F

D. Face shields in lieu of masks (ANSI Face Shields/Disposable Face Shields):

- (1) Are acceptable alternative to cloth face coverings for field employees and employees with medical conditions preventing the use of cloth face coverings who have an approved accommodation.
- (2) Must cover the entire front of the face (extending to the chin or below) and the sides of the face. When a face shield is provided by the employer, homemade face shields are unacceptable.
- (3) When wearing face shields that meet ANSI requirements and are impact resistant, safety glasses are not necessary. When wearing a disposable face shield, must wear safety glasses/goggles as required.
- (4) When putting on and after removing face shields, practice hand hygiene by washing hands with soap and water for at least 20 seconds. Avoid touching and readjusting face shields as much as possible to prevent spreading germs.
- (5) When removing a face shield, carefully grab the strap and pull upwards and away from the head. Do not touch the front of the face shield.
- (6) Face shields must be cleaned following proper cleaning protocols, i.e. wiped down at end of each day with disinfectant. Follow manufacturer instructions when available or consider the following:
 - a. While wearing disposable gloves, carefully wipe the *inside*, followed by the *outside* of the face shield using a clean cloth saturated with neutral detergent solution or cleaner wipe.
 - b. Carefully wipe the *outside* of the face shield using a wipe or clean cloth with disinfectant solution.
 - c. Wipe the outside of face shield with clean water or alcohol to remove

residue.

- d. Fully dry (air dry or use clean absorbent towels).
 - e. Remove gloves and perform hand hygiene.
- (7) Face shields must be examined for cracks and/or damage and must be reported to the supervisor for replacement. Disposable face shields may be worn more than one day; however, it should be replaced if the shield is damaged, can no longer fasten securely, or if visibility is obscured and reprocessing does not restore visibility.
- (8) Disposable shields must be disposed of properly by doing the following:
- a. Seal the disposable shield in a plastic bag;
 - b. Mark the bag with your name and employee number;
 - c. Turn the used or broken disposable shield into the stock room or your Foreman to receive a replacement.

6. Program Review

The effectiveness of this protocol in keeping employees safe when there is potential for infectious viruses or an unsafe work condition related to heat illnesses. This protocol will be evaluated annually by the Employee Safety Division, Bureau of Performance Operations and Bureau of Maintenance Operation with appropriate actions taken to address any deficiencies found.

7. Recordkeeping

This protocol contains new existing information due to COVID 19 pandemic. Content that is being introduced for the first time in the Pub 445M, Manual for Employee Safety and Health (MESH) is identified as "original".

Section	Topic
1-5	Original as per the AIPP requirement.

Revision 1 (6-5-2020)