

Supplement No. 1, Revision 1
COVID-19 Guidance: Restarting Construction Projects
Versions dated March 30, 2020 and April 24, 2020A

Supplement No. 1 has been revised to include the following:

- **An updated weblink to the Pennsylvania Department of Health's Frequently Asked Questions**
- **Weblink to the Secretary of Health's Order dated July 1, 2020 Requiring Universal Face Coverings**
- **Face covering required when interacting in-person with any member of the public on a construction project**
- **Face covering required when outdoors and unable to consistently maintain a distance of six feet from individuals who are not members of their household**
- **Protocol 34 – Revision 4 (7-13-2020)**

Supplement No. 1, Revision 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 [Secretary of Health's Order dated July 1, 2020 Requiring Universal Face Coverings](#) (SHO RUFC) indicates that face coverings are required when interacting in-person with any member of the public.

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. The [SHO RUFC](#) also indicates that face coverings are required when outdoors and unable to consistently maintain a distance of six feet from individuals who are not members of their household.

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 Protective 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:

- Masks are required to be worn when interacting in-person with any member of the public on a construction project.
- 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 required to comply with the guidance provided above, 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 to comply with the guidance provided above. 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 PROTECTIVE EQUIPMENT
REVISION 4 (7-13-2020)

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

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1. Policy

PennDOT is committed to reducing the hazards associated with potential heat illness when wearing Personal Protective 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 the sources of recommendations; 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 \(DOH\)](#)

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 contagious illnesses 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 protective equipment, for employees issued a face shield this includes supplies to properly clean their face shield.
 - (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 E.

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

B. Face Coverings for Field Employees:

- (1) Must be worn at all times when engaged in¹ work activities, **whether at the work place or performing work off-site,** unless an exemption applies from Section “C” of this protocol.

¹ Note- Yellow highlights indicate recent changes to documents that are now being re-issued.

- (2) Must always be worn in indoor areas open to the public and when interacting with members of the public in-person.
- (3) 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).
- (4) Must be worn when occupying a small room (<100 square feet) with another individual, for any amount of time.
- (5) A face covering should be replaced if it is damp or wet from sweat, spit or mucus.
- (6) When putting on and after removing a face covering, practice hand hygiene by using an approved applicable method (soap and water, hand sanitizer and waterless soap). Avoid touching and readjusting the face covering as much as possible to prevent spreading germs.
- (7) When removing a face covering, grasp the covering from the back (ties or loops) and carefully pull away from the face. Do not touch the front of the face covering.
- (8) Reusable face coverings should be cleaned by employees following manufacturer recommendations. Basic cleaning of cloth face coverings involves one of the following methods.
 - a. Machine Washing
 - i. Wash in hot water and regular laundry detergent. Bleach can be used in a washing machine with the mask.
 - ii. Use dryer on high heat until fully dried.
 - b. Handwashing
 - i. Wash in warm soapy water.
 - ii. Rinse thoroughly with water ensuring both sides and straps have been rinsed.
 - iii. Air dry fully, hanging method is preferred as to allow both sides to fully dry.
- (9) See safety talk on: COVID-19 and Wearing a Face Cover, April Safety Talk for more details.

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 unless unable to wear a cloth face covering due to a medical condition. Employees with a medical condition preventing the use of a cloth face covering must contact their ADA Coordinator for an accommodation.
- (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 of six (6) feet of another individual must still be applied.
- (6) May be removed when communicating or seeking to communicate with someone who is hearing-impaired or has another disability, where the ability to see the mouth is essential for communication.

May be removed when a supervisor determines heat may create an unsafe condition by using the following method below “Preventing Heat Related Illness Guidelines” section shown below:

D. Permissible removal of face coverings for garage personnel:

- (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) May be removed by employees when in their garage bay alone and/or when proper social distancing can be maintained, but must be worn within six (6) feet of another individual.
- (3) 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.
- (4) May be removed to eat or drink during breaks and lunch periods; however, social distancing techniques of six (6) feet of another individual must still be applied.
- (5) May be removed when communicating or seeking to communicate with someone who is hearing-impaired or has another disability, where the ability to see the mouth is essential for communication. Employees unable to wear a cloth face covering due to a medical condition must contact their ADA Coordinator for an accommodation.

Preventing Heat 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. The OSHA standard used to create the chart can be found [here](#).

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. Red on this chart indicates wearing a mask may cause harm. 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.

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

Additional effort must be made to allow employee to keep a distance of 15 feet apart in accordance with Section 5 C (2) of this protocol.

E. 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. Homemade face shields are

unacceptable.

- (4) When wearing face shields that meet ANSI requirements and are impact resistant, safety glasses are not necessary. When wearing a disposable face shield, employees must wear safety glasses/goggles as required.
- (5) When putting on and after removing face shields, practice hand hygiene by using an approved applicable method (soap and water, hand sanitizer or waterless soap). Avoid touching and readjusting face shields as much as possible to prevent spreading germs.
- (6) 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.
- (7) 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 cleaning 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
1-7	Original as per the AIPP requirement.

Revision 4 (7-13-2020)