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COVID-19 - Control and Prevention / Construction Work

## Construction Work

COVID-19 Control and Prevention

This guidance is not a standard or regulation, and it creates no new legal obligations. It contains recommendations as well as descriptions of mandatory safety and health standards. The recommendations are advisory in nature, informational in content, and are intended to assist employers in providing a safe and healthful workplace. The Occupational Safety and Health Act requires employers to comply with safety and health standards and regulations promulgated by OSHA or by a state with an OSHA-approved state plan. In addition, the Act's General Duty Clause, Section 5(a) (1), requires employers to provide their employees with a workplace free from recognized hazards likely to cause death or serious physical harm.

This section provides guidance for construction employers and workers, such as those engaged in carpentry, ironworking, plumbing, electrical, heating/ventilation/air conditioning/ventilation, masonry and concrete work, utility construction work, and earthmoving activities. This guidance supplements the general, interim guidance for all workers and employers of workers with potential occupational exposures to SARS-CoV-2.

Remain alert of changing outbreak conditions, including as they relate to community spread of the virus and testing availability, and implement infection prevention measures accordingly. As states or regions satisfy the gating criteria to progress through the phases of the Guidelines for Opening up America Again, you will likely be able to adapt this guidance to better suit evolving risk levels and necessary control measures in your workplaces.

Assess the hazards to which your workers may be exposed; evaluate the risk of exposure; and select, implement, and ensure workers use controls to prevent exposure. The table below describes construction work tasks associated with the exposure risk levels in OSHA's occupational exposure risk pyramid, which may serve as a guide to employers in this sector.



Photo Credit: Courtesy of Turner Construction

### Construction work tasks associated with exposure risk levels

Lower (caution)	Medium	High	Very High
<ul style="list-style-type: none"> <li>Tasks that allow employees to remain at least 6 feet apart and involve little contact with the public, visitors, or customers.</li> </ul> <p>Note: For activities in the lower (caution) risk category, OSHA's <i>Interim Guidance for Workers and Employers of Workers at Lower Risk of Exposure</i> may be most appropriate.</p>	<ul style="list-style-type: none"> <li>Tasks that require workers to be within 6 feet of one another.</li> <li>Tasks that require workers to be in close contact (within 6 feet) with customers, visitors, or members of the public.</li> </ul>	<ul style="list-style-type: none"> <li>Entering an indoor work site occupied by people such as other workers, customers, or residents suspected of having or known to have COVID-19, including when an occupant of the site reports signs and symptoms consistent with COVID-19.</li> </ul> <p>Note: Employers may consider delaying this work following the guidance below.</p>	<ul style="list-style-type: none"> <li>Category not applicable for most anticipated work tasks.</li> </ul> <p>Note: Most construction work tasks are associated with no more than high exposure risk; see the work tasks associated with lower, medium, or high risk on this chart.</p>

Conducting a job hazard analysis can help you to determine whether work activities require close contact (within 6 feet) between workers and customers, visitors, or other members of the public. When a job hazard analysis identifies activities with higher exposure risks, and those activities are not essential, consider delaying them until they can be performed safely (e.g., when appropriate infection prevention measures, as discussed on this page, can be implemented or once community transmission subsides).

### Engineering Controls

In the indoor construction environment, **when work is determined to be essential or emergency work, and a person (e.g., coworker, visitor, resident, subcontractor) suspected of having or known to have COVID-19 is present at the worksite in close proximity to where workers would be working:**

Use closed doors and walls, whenever feasible, as physical barriers to separate workers from any individuals experiencing signs and/or symptoms consistent with COVID-19.

- Consider erecting plastic sheeting barriers when workers need to occupy specific areas of an indoor work site where they are in close contact (less than 6 feet) with someone suspected of having or known to have COVID-19.

During the COVID-19 pandemic, periodically reassess engineering controls (as well as work practices and administrative controls) to identify any changes that can be made to decrease the need for N95 respirators (or other respirators with a higher level of protection) and other personal protective equipment (PPE) ordinarily used for work activities that involve exposure to hazardous substances. This can help conserve PPE that is in short supply or needs to be diverted to activities associated with higher SARS-CoV-2 exposure risks. For example, a reassessment of engineering controls may identify improvements to water delivery or dust collection systems that will further reduce ambient dust when cutting, breaking, jackhammering, or drilling.

### Administrative Controls

Use administrative controls, when feasible, to reduce or eliminate the risk of exposure. Implement, and update policies to reflect:

- Standard operating procedures that follow the Centers for Disease Control and Prevention (CDC), OSHA, state/territorial, and local guidelines for preventing the spread of COVID-19 infection.
- Training for employees on the spread of the disease in the geographic areas in which they work.
- Screening calls when scheduling indoor construction work to assess potential exposures and circumstances in the work environment, before worker entry.

Below are sample questions for screening work assignments before sending a worker to perform construction activities in an **indoor** indoor environment that may be occupied by a homeowner, customer, worker, or another occupant. Preface these questions with an explanation that they are being asked to protect workers and minimize the spread of COVID-19.

Screening Questions	Recommended Action
1. Is the construction work at an occupied work site essential, urgent, or emergency work?	If "yes," proceed with a hazard assessment to determine how best to proceed while minimizing exposure for the worker. See the questions below.
2. Are there any individuals in the occupied site under quarantine or isolation due to a confirmed case of COVID-19?	Closely follow recommended infection prevention measures in the sections on Engineering Controls, Administrative Controls, Safe Work Practices, and PPE.
3. If the work is determined to be essential, urgent or <b>emergency work</b> , are there any individuals or contractors in the occupied site suffering flu-like symptoms to which your employees may be exposed?	Closely follow recommended infection prevention measures in the sections on Engineering Controls, Administrative Controls, Safe Work Practices, and PPE.

Train construction workers on:

- The signs and symptoms of COVID-19 and an explanation of how the disease is potentially spread, including the fact that infected people can spread the virus even if they do not have symptoms.
- All policies and procedures that are applicable to the employee's duties as they relate to potential exposures to SARS-CoV-2. It is helpful to provide employees with a written copy of those standard operating procedures.
- Information on appropriate social distancing and hygiene practices, including:
  - Avoiding physical contact with others and maintaining a distance of at least 6 feet from customers and other individuals, whenever possible, including inside work trailers.
  - Appropriate cleaning practices (i.e., washing hands frequently with soap and water for at least 20 seconds, or, if soap and water are not immediately available, using alcohol-based hand sanitizer that contains at least 60% alcohol and rubbing hands until they are dry; sanitizing all surfaces workers will touch).
  - The proper way to cover coughs and sneezes following CDC recommendations (i.e., sneezing or coughing into a tissue or into the upper sleeve).
  - Alternatives to shaking hands upon entry, and the importance of workers not touching their own faces (mouth, nose, eyes).
  - The benefits of driving to work sites or parking areas individually, when possible, without passengers or carpools.
- The types, proper use, limitations, location, handling, decontamination, removal, and disposal of any PPE being used.
- The importance of staying home if they are sick.
- Wearing masks over their noses and mouths to prevent them from spreading the virus.
- The need to continue using other normal control measures, including PPE, necessary to protect workers from other job hazards associated with construction activities.
- Using Environmental Protection Agency-approved cleaning chemicals from List N or that have label claims against the coronavirus for cleaning frequently touched surfaces like tools, handles, and machines.
- The need to report any safety and health concerns.

Implement standard operating procedures and employee training to ensure that, **before entry into home environments or areas where construction is ongoing in occupied buildings**, workers:

- Request that any individuals under quarantine or isolation who have been diagnosed with COVID-19 or are experiencing signs and/or symptoms of COVID-19 remain physically separated from the worker (e.g., in a different room, on a different level of the home or building, or outside if weather and applicable emergency orders permit) and communicate remotely with the worker (e.g., by cell phone, using internet-based payment systems and electronic signatures to confirm that work was completed).
- Ask individuals in the workplace to wear a cloth or other face covering, if available, and to cover coughs and sneezes.
- Request that shared spaces in the construction area have good air flow, such as by turning on an air conditioner or opening windows, weather permitting, consistent with CDC recommended precautions for people in households.

### Cloth Face Coverings in Construction

**CDC recommends wearing cloth face coverings as a protective measure in addition to social distancing (i.e., staying at least 6 feet away from others). Cloth face coverings may be especially important when social distancing is not possible or feasible based on working conditions.** A cloth face covering may reduce the amount of large respiratory droplets that a person spreads when talking, sneezing, or coughing. Cloth face coverings may prevent people who do not know they have the virus that causes COVID-19 from spreading it to others. Cloth face coverings are intended to protect other people—not the wearer.

**Cloth face coverings are not PPE. They are not appropriate substitutes for PPE such as respirators (like N95 respirators) or medical facemasks (like surgical masks) in workplaces where respirators or facemasks are recommended or required to protect the wearer.**

While wearing cloth face coverings is a public health measure intended to reduce the spread of COVID-19 in communities, it may not be practical for workers to wear a single cloth face covering for the full duration of a work shift (e.g., eight or more hours) on a construction site if they become wet, soiled, or otherwise visibly contaminated during the work shift. If cloth face coverings are worn on construction sites, employers should provide readily available clean cloth face coverings (or disposable facemask options) for workers to use when the coverings become wet, soiled, or otherwise visibly contaminated.

Employers who determine that cloth face coverings should be worn at a construction site, including to comply with state or local requirements for their use, should ensure the cloth face coverings:

- Fit over the nose and mouth and fit snugly but comfortably against the side of the face;
- Are secured with ties or ear loops;
- Include multiple layers of fabric;
- Allow for breathing without restriction;
- Can be laundered using the warmest appropriate water setting and machine dried daily after the shift, without damage or change to shape (a clean cloth face covering should be used each day);
- Are not used if they become wet or contaminated;
- Are replaced with clean replacements, provided by employer, as needed;
- Are handled as little as possible to prevent transferring infectious materials to the cloth; and
- Are not worn with or instead of respiratory protection when respirators are needed.

## Safe Work Practices

To the extent possible, screen all visitors on all construction sites in advance of their arrival on the job site for signs and symptoms of COVID-19.

Adopt staggered work schedules, e.g., provide alternating workdays or extra shifts, to reduce the total number of employees on a job site at any given time and to ensure physical distancing.

Identify choke points where workers are forced to stand together, such as hallways, hoists and elevators, ingress and egress points, break areas, and buses, and implement policies to maintain social distancing.

In elevators and personnel hoists, ensure 6 feet distance between passengers in all directions and equip operators with appropriate respiratory protection and other necessary PPE.

Coordinate site deliveries in line with the employer's minimal contact and cleaning protocols. Delivery personnel should remain in their vehicles if at all possible.

Institute a rigorous housekeeping program to reduce dust levels on the job site.

Keep in-person meetings (including toolbox talks and safety meetings) as short as possible, limit the number of workers in attendance, and use social distancing practices.

Ensure clean toilet and handwashing facilities. Clean and disinfect portable job site toilets regularly. Fill hand sanitizer dispensers regularly. Disinfect frequently touched items (i.e., door pulls and toilet seats) regularly.

## Personal Protective Equipment

Most construction workers are unlikely to need PPE beyond what they use to protect themselves during routine job tasks. Such PPE may include a hard hat, gloves, safety glasses, and a face mask. However, under OSHA's PPE standards for construction (29 CFR 1926 Subpart E), employers must consider whether their hazard and risk assessments, including construction site job hazard analyses, indicate a need for the use of more protective PPE.

Make every effort to protect workers through measures other than PPE. When workers need PPE, employers must comply with OSHA's standards for PPE in construction (29 CFR 1926 Subpart E).

When other control measures are not sufficient to protect workers, equip those who must enter potentially hazardous homes or occupied work sites with adequate supplies of appropriate PPE. PPE ensembles may include gloves, eye protection, and/or face shields.

### Flexibilities Regarding OSHA's PPE Requirements and Prioritization of PPE During COVID-19

Some employers may experience shortages of PPE, including face shields and respirators, as a result of the COVID-19 pandemic.

See information on PPE flexibilities and prioritization in the Personal Protective Equipment Considerations section within the Interim Guidance for U.S. Workers and

In limited circumstances, including situations involving close contact (i.e., within 6 feet) with someone with suspected or confirmed COVID-19, respiratory protection may be needed and must be provided by the employer in accordance with the criteria below:

Employers of Workers with Potential Occupational Exposures to SARS-CoV-2, above.

- When respiratory hazards exist, employers must comply with OSHA's Respiratory Protection standard (29 CFR 1910.134). OSHA is providing enforcement flexibility under the standard, see enforcement memoranda.
- When disposable respirators are used, employers must comply with the requirements of OSHA's Respiratory Protection standard (29 CFR 1910.134), including the requirement to train workers to don respirators before entry and to remove and properly dispose of respirators upon exit.

Please see 29 CFR 1926.28(a) and 29 CFR 1910.134(d)(1)(iii) for information about OSHA's hazard assessment/evaluation requirements for PPE and respiratory protection, respectively.

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