

SAFETY PROCEDURES

COVID-19 SAFETY POLICY

Updated May 8, 2020 in compliance with State of Michigan Executive Order 2020-70, as it relates to the construction industry.



Contents

PURPOSE	3
INITIAL PRECAUTIONS	3
LDD SUBCONTRACTORS, SUPPLIERS OR VISITORS CLIENTS	4
EMPLOYEE EDUCATION	5
CONTINUING PRECAUTIONS IN COMPLIANCE WITH EO 2020-70	5
Access Control Social Distancing Sanitation/Hygiene PPE Contact tracing / Isolation Site Risk Assessment	7 8 8
RULES	9
Exhibit Δ — LDD Safety Bulletin	11

PURPOSE

Ensuring the health and safety of all of our clients, employees, contractors and visitors is our most important responsibility. As we continue to monitor the impacts of COVID-19 closely, we are following federal, provincial and municipal directives and recommendations.

We need to consider how best to decrease the spread of COVID-19 and lower the impact in our workplace and those of our customers. This includes activities in one or more of the following areas:

- 1. Access Control
- 2. Social Distancing
- 3. Sanitation/Hygiene
- 4. PPF
- 5. Contact Tracing/Isolation

All parties (employees, subcontractors, visitors, etc.) who enter any of L.D. Docsa (LDD) jobsites will be required to follow all rules of the LDD COVID-19 policies and procedures.

INITIAL PRECAUTIONS

LDD

- 1. Canceled all non-essential travel.
- 2. Encourage staff to telework (when feasible), particularly individuals at increased risk of severe illness
- 3. Restricted access to our worksite if the individual has traveled internationally in the past 14 days.
- 4. Prompt identification and isolation of potentially infectious individuals is a critical step in protecting workers, customers, visitors, and others. We mandate self-isolation for any symptomatic personnel. Employees who have symptoms (i.e., fever, cough, or shortness of breath) should notify their supervisor and stay home.

- 5. If an employee is confirmed to have COVID-19 infection, we will inform fellow employees of their possible exposure to COVID-19 in the workplace but maintain confidentiality as required by law. The fellow employees should then self-monitor for symptoms (i.e., fever, cough, or shortness of breath).
- 6. Ensured hand hygiene supplies are readily available in our workplace.
- 7. Increased frequency of cleaning with disinfectants recommended for coronavirus.
- 8. Require frequent and thorough handwashing, sanitizing, as well as coughing and sneezing etiquette.
- 9. Implementing various levels of social distancing measures including limiting inperson meetings, lunchroom seating and after work functions.

SUBCONTRACTORS, SUPPLIERS OR VISITORS

We require that any contractor, supplier or visitor comply with federal, provincial and municipal guidelines and postpone any plans to visit our facility if within the last 14 days they have:

- 1. been diagnosed with COVID-19.
- 2. traveled internationally in the past 14 days.
- 3. been exposed to an individual diagnosed with COVID-19.
- 4. have had close contact with a person suspected of direct exposure to COVID-19.

CLIENTS

In addition to abiding by all policies rules and regulations set forth in this document, we take the following precautions for our clients:

- 1. Deny access to any client location if any employee has traveled internationally in the past 14 days.
- 2. Deny access to any client if an employee has been diagnosed with COVID-19.
- 3. Deny access to any client location if any employee shows symptomatic signs fever, cough or shortness of breath) or have had close contact with a person suspected of direct exposure to COVID-19.
- 4. We will strictly follow our client requirements for entry on their property to perform work.
- 5. No formerly denied access employee will be allowed to return to work until cleared based on local law or regulation.

EMPLOYEE EDUCATION

- 1. Wash your hands often with soap and water for at least 20 seconds. Use hand sanitizer with at least 70% alcohol if soap and water are not available. Always wash hands when they are visibly soiled and after removing any PPE.
- 2. Avoid touching your eyes, nose, and mouth with unwashed hands.
- 3. Cover your mouth and nose with a tissue when you cough or sneeze or use the inside of your elbow. Throw used tissues in the trash and immediately wash hands with soap and water for at least 20 seconds. If soap and water are not available, use hand sanitizer containing at least 70% alcohol.
- 4. Clean AND disinfect frequently touched objects and surfaces such as workstations, keyboards, telephones, handrails, and doorknobs. Dirty surfaces can be cleaned with soap and water prior to disinfection. To disinfect, use products that meet criteria for use against COVID-19, and are appropriate for the surface.
- 5. Avoid using other employees' phones, desks, offices, or other work tools and equipment, when possible. If necessary, clean and disinfect them before and after use.
- 6. Practice social distancing by avoiding large gatherings and maintaining distance (approximately 6 feet or 2 meters) from others when possible.

CONTINUING PRECAUTIONS IN COMPLIANCE WITH EO 2020-70

IMPORTANT! The following sections are noted as added modifications to the COVID-19 Safety Policy as of May 8, 2020.

The following information modifies this document to comply with the State of Michigan Executive Order No. 2020-70.

In addition to the above noted precautions, the following additional statements are made:

1. L.D. Docsa jobsites are evaluated as a medium risk jobsite, and only a high risk jobsite when work is completed in areas of the wastewater treatment plant that

- may have waste that could cause spray into the air. Risk levels were established utilizing the CDC guidelines.
- 2. L.D. Docsa has designated a site specific supervisor to maintain COVID policy standards at each jobsite.
- 3. L.D. Docsa has implemented daily health screenings at jobsite trailer.
- 4. L.D. Docsa has limited access to jobsites through one point of entry, where possible. Notifications are posted that health screens are mandatory, daily, by all workers.
- 5. L.D. Docsa has mandated PPE when as required by the recommendations set forth by governing officials. All PPE will be handed out by site COVID supervisor who will report to Safety director for refill of supplies.
- 6. L.D. Docsa has implemented measures to prohibit gatherings of any size in which people cannot maintain six feet of distance from one another, where possible. Where not possible, employees are required to wear a face mask for the protection of all parties. Only in the event that work requires multiple people, will this be accepted.

As referred to in the Purpose section of this policy, L.D. Docsa provides the following guidelines to cover Access Control, Social Distancing, Sanitation and Hygiene, PPE as well as Contact Tracing/Isolation.

Access Control

Implementing best practices to quickly identify and catalogue potential introductions of COVID-19 into the workplace.

As part of protocol, L.D. Docsa has implemented a single source entry prior to to each jobsite, as well as the main office. All persons entering any LDD facility are required to complete a daily health screening questionnaire. This will be accomplished at designated locations for each site, i.e., jobsite trailer and office entry point, as required by EO 2020-70. Upon successful completion of the daily health screening, person may proceed with daily activities involving LDD. Those individuals passing the health screen will be provided with a daily sticker, acknowledging they are health approved for work that day.

The health screen will consist of the following:

1. The following questions will be asked:

- a. Have you traveled or been in contact with someone who has traveled outside your region in the past 14 days?
- b. Have you or any member of your family been in close contact with a person(s) diagnosed with or person(s) suspected with nCoV or person(s) who have been quarantined at home during the last 14 days?
- c. Have you been experiencing any of the following?(Select all that apply)
 - i. Fever.
 - ii. Runny Nose,
 - iii. Shortness of Breath,
 - iv. Cough,
 - v. Sore Throat,
 - vi. Persistent pain or pressure in the chest,
 - vii. New confusion or inability to arouse,
 - viii. Bluish lips or face,
 - ix. Chills or repeated shaking,
 - x. Muscle pain,
 - xi. New loss of taste or smell,
 - xii. Headache,
 - xiii. None of the above
- 2. Person must visually demonstrate the completion of the daily health screening. Stickers will be provided as this resource.
- 3. If any person answers yes to any of the health screening questions, they will not be allowed to proceed on LDD sites.

Social Distancing

Minimizing levels of close contact within the workplace to limit the spread of COVID-19 among workers. To achieve this, LDD will enforce the 6' social distancing measures set in place by the CDC where able. If social distancing is not attainable, LDD requires all parties to utilize the appropriate PPE to the situation

In addition, LDD requests all person refrain from common areas where appropriate social distancing cannot be observed. If use of common areas are required, person must sanitize area prior to departure. In common areas where

social distancing cannot be observed, persons must limit capacity to one (1) person at a time, where necessary.

Sanitation/Hygiene

Increasing both the frequency and vigor of common cleaning practices as well as implementing new ones to reduce the amount of time COVID-19 can live on surfaces.

We're already cautious when it comes to hygiene, but in times like these, we ask you to always follow these official guidelines:

- 1. Wash your hands regularly throughout the day for at least 20 seconds at a time.
- 2. Utilize social distancing rules by staying a minimum of 6 feet apart from all other workers. When staying 6 feet apart is not possible, appropriate PPE must be worn Use hand sanitizers with at least 60% alcohol we've equipped the office/jobsite.
- 3. Avoid touching your face especially eyes, nose, and mouth.
- 4. Cover your mouth with your elbow when you cough or sneeze.
- 5. When working in untreated sections of a WWTP PPE will be required (full face respirator, gloves, full TYVEK suit).
- 6. Until further notice there will be no carpooling allowed.
- 7. No gatherings in the job trailers. All meetings will be conducted outside the trailer with social distancing measures implemented.
- 8. Cleaning supplies with EPA-approved labels for killing viruses will be available at all times as well as wash stations and hand sanitizers throughout the jobsite/office. Disposable gloves and face masks will also be available.

PPE

Ensuring all employees have access to personal protective equipment to keep them from both contracting and transmitting the COVID-19 virus. LDD provides two categories for PPE requirements. These requirements are in full effect during the COVID-19 outbreak. Only when notified by senior staff that the risk of COVID-19 has been reduced in accordance with governing authorities, will these regulations be lifted.

LOW/MEDIUM Risk Assessment

- Facemasks
- Hand protection

HIGH Risk Assessment

TYVEK suit

Note, these PPE requirements are not a replacement of the current PPE requirements set forth for the project, but are meant to enhance safety measures in following CDC guidelines.

Contact tracing / Isolation

Designing and imparting to employees important procedures and protocols on what occurs if an employee is suspected to have and/or diagnosed with COVID-19.

It is mandatory that all parties involved with our projects report cases of COVID to LDD in order to follow proper protocols set forth by the CDC.

Site Risk Assessment

L.D. Docsa has designated all water and wastewater treatment projects as a MEDIUM level risk assessment, except in areas where raw sewage is present. In those areas where raw sewage is present, LDD has designated those areas as a HIGH level risk assessment. Employees shall follow PPE protocols for the associated risk level of the site/designated area. Those protocols are noted in the above PPE section.

RULES

L.D. Docsa will make clear the rules set in place for the office space as well as jobsites by displaying signs in visible locations. If anyone is out of compliance of the rules set forth, they will be dismissed from the site until in compliance. The following rules apply to ALL LDD sites, including the main office.

- 1. Designate COVID-19 response site leader.
- 2. Designate a single point of entry at all sites.
- 3. Require all incoming traffic to complete a daily health screening.
- 4. Only upon successful completion of the daily health screening, are persons allowed to continue with daily LDD activities.
- 5. Upon unsuccessful completion of the daily health screening, persons will be denied access to LDD sites.
- 6. PPE Requirements
- 7. Office: Facemasks are required at all times when in common areas.
- 8. Jobsites: Follow PPE requirements associated with jobsite risk assessment.
- 9. Maintain 6' social distancing measures set in place, where capable.
- 10. DO NOT gather in common areas, i.e., jobsite trailer, breakroom, bathroom, etc. If necessary, sanitize after use, and limit to an occupancy of one.
- 11. When in the office, DO NOT enter anyone's personal office unless wearing PPE and invited in.
- 12. If you have been exposed to someone with the COVID-19 virus, report this information to your site COVID-19 response leader and follow further protocols.

This policy is set in place for the safety of LDD employees and associates.

Exhibit A - LDD Safety Bulletin

LDD SAFETY BULLETIN RESPONSE TO COVID-19 BEST PRACTICES

March 17, 2020



The outbreak of the Coronavirus (COVID-19) is affecting everyone around the globe. As an engineering contractor, safety is always our priority and that is especially true as we all confront this pandemic together. As we are not experts in infectious disease control, we are relying on the directions provided by the CDC as well as our State and Local authorities, and encourage everyone to abide by these precautionary measures in moving forward.

Our priority is protecting the health and well-being of our employees and their families, as well as our clients and partners. The following are actions that we have taken to actively address the outbreak of COVID-19:

- Actively review and follow CDC guidelines to prevent the spread of illness.
- Utilize a consistent protocol for assessing workers' health and refer to CDC risk assessment chart as a
 precautionary guide. (With a modification to Question (1) to reflect any international travel.)
- Maintain a healthy worksite by encouraging employees who are feeling ill to remain at home until
 they are able to return to work in a healthy state.
- Ensure the enforcement of appropriate PPE rules and regulations on our work-sites.
- · Participate in social distancing as recommended.
- Utilize work from home options as necessary.

L.D. Docsa remains open for business to continue to deliver services to our clients. We actively encourage everyone, not only within our company, to participate in best practices as to ensure the safety and health of all

Valuable information is available as noted below for your use and information. This plan may continue to be updated as governmental recommendations change.

Resources

Centers for Disease Control and Prevention: (1) "Coronavirus Disease 2019 (COVID-19)";

https://www.cdc.gov/media/db/diseases-and-conditions/coronavirus/coronavirus/2020.html(2) "What You Need To Know"; https://www.cdc.gov/coronavirus/2019-ncov/index.html(3) "Coronavirus Disease 2019 (COVID-19) Risk Assessment and Public Health"; https://www.cdc.gov/coronavirus/2019-ncov/index.html(3) "Coronavirus/2019-ncov/downloads/public-health-management-decision-making.pdf?utm_source=hs_email&utm_medium=email&utm_content=84811666&_hsenc=p2ANqtz-9esx0Lxg-Mpn3ou5-15d8fRc2OiIPNySsmRoaDS3tt.rw1]Y8GRDyCo2bRbqmDP9rOmAV7MFA_3PpPVfvm-kq52PwS9ew&_hsmi=94811666

OSHA: "COVID-19 Control and Prevention"; https://www.osha.gov/SLTC/covid-19/controlorevention.html#solidwaste-8
"Protecting Workers during a Pandemic"; https://www.osha.gov/Fublications/OSHAFS-3747.pdf

Water Environment Federation: "The Water Professional's Guide to COVID-19"; https://www.wef.org/news-hub/wef-news/the-water-professionals-guide-to-the-2019-novel-coronavirus/

300 S. 8th Street | Kalamazoo, MI 49009 (O) 269.349.7675 | (F) 269.349.2511 LDDOCSA.COM @DOCSAGC

LDD SAFETY BULLETIN

RESPONSE TO COVID-19 BEST PRACTICES

June 10, 2020 RESTRICTION UPDATE



The outbreak of the Coronavirus (COVID-19) is affecting everyone around the globe. As an engineering contractor, safety is always our priority and that is especially true as we all confront this pandemic together. As we are not experts in infectious disease control, we are relying on the directions provided by the CDC as well as our State and Local authorities, and encourage everyone to abide by these precautionary measures in moving forward.

Our priority is protecting the health and well-being of our employees and their families, as well as our clients and partners. As statistics continue to decline on the confirmed COVID-19 cases and deaths, LDD had decided to lift the following restriction:

 As noted in the employee letter distributed in April of 2020, the restriction for employee ride sharing will be lifted starting on Monday, June 15, 2020. Employees are to only ride-share with other LDD employees to LDD projects. While ride sharing, employees must wear a mask.

As the situation continues to evolve, LDD will continue to review current restrictions. Again, our priority is the safety of our employees, first and foremost. We thank-you in advance for following the procedures set in place to assist in our entire Country's efforts to slow the spread.

If you have any questions or concerns, do not hesitate to contact our office.

LDD SAFETY BULLETIN

RESPONSE TO COVID-19 BEST PRACTICES

June 16, 2020 RESTRICTION UPDATE



The outbreak of the Coronavirus (COVID-19) is affecting everyone around the globe. As an engineering contractor, safety is always our priority and that is especially true as we all confront this pandemic together. As we are not experts in infectious disease control, we are relying on the directions provided by the CDC as well as our State and Local authorities, and encourage everyone to abide by these precautionary measures in moving forward.

Our priority is protecting the health and well-being of our employees and their families, as well as our clients and partners. As statistics continue to decline on the confirmed COVID-19 cases and deaths, LDD had decided to lift the following restriction:

• A quarantine period will only be required upon "close contact" with an infected person. The quarantine period is no longer required after domestic travel, as long as that person traveling has not had close contact with an infected person.

Here is what we know about "close contact" being defined as from the State of Michigan:

1. Being within approximately 6 feet (2 meters) of a COVID-19 case for a prolonged period. (We do not know exactly how long is necessary for close contact to occur, but it is thought to be between 10-30 minutes.

— or –

2. Having direct contact with infectious secretions of a COVID-19 case (e.g., being coughed on).

Examples of close contact is as noted:

- Caring for, living with or visiting someone who has COVID-19.
- Being near someone who has COVID-19, in a confined space, if that person is not wearing a mask.
- Being coughed or sneezed on by someone who has COVID-19.

Again, LDD is not requiring quarantine after domestic travel, however, a 14-day quarantine period is required if you have come in contact with an infected person. Note, 3rd party exposure does not apply for the quarantine period. (For example, a close friend of my spouse has been diagnosed, and they recently spent time together.) Contact your supervisor for possible quarantine requirements if you are traveling internationally.

As the situation continues to evolve, LDD will continue to review current restrictions. Again, our priority is the safety of our employees, first and foremost. We thank-you in advance for following the procedures set in place to assist in our entire Country's efforts to slow the spread.

If you have any questions or concerns, do not hesitate to contact our office.

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