Making Sense of Oregon Requirements

Understanding Physical Distancing and Face Coverings

All contractors should incorporate COVID-19 transmission and prevention into all job hazard analyses (JHAs) and pre-task safety planning for all aspects of the work. This tool is provided solely as a guideline for contractors and is not to be relied upon to prevent the spread or transmission of COVID-19, or prevent a safety violation from being issued by a jurisdictional authority. This is not legal advice. Contractors should continually evaluate the specific hazards at their job sites along with the Centers for Disease Control and Prevention (CDC) recommendations to determine the most appropriate job hazard analysis for the project/task as it relates to the spread and/or transmission of COVID-19. The requirements listed below are only minimum requirements. You are strongly encouraged to go above and beyond these minimums and develop your own company policies and procedures.

A construction jobsite is not a public space and should not be treated as such. The only people allowed on a jobsite should be workers, vendors and those necessary to the construction process. If the public is allowed on the jobsite without being invited or having a work-related reason then your site could fall under the definition of a public space.

Face coverings include face masks, face coverings and face shields that cover the nose and mouth. These are “Source Control” measures that control the emissions being projected from the wearer’s nose and mouth and worn to prevent transmission to others. Face coverings are NOT personal protective equipment (PPE). N95 masks and other respirators are PPE and are meant to protect the wearer from respiratory hazards such as silica and asbestos. N95 masks that have exhalation valves should NOT be used as “Source Control” as exhalation valves allow emissions to leave the mask and no longer prevents transmission from the source.

Jobsite Physical Distancing Requirements

- Workers need to maintain at least six feet of physical distance between themselves and their co-workers. This applies to both indoor and outdoor jobsites. This also applies to common areas outside of the jobsite such as parking lots, food vendors and access points.
- If a task requires workers to be closer than six feet, refer to site management for a task-specific job hazard analysis (JHA). Use the hierarchy of controls to determine the plan, which may include re-engineering the task, using an impermeable barrier between workers or source control measures that may include face coverings or face-shields.
- When riding in company vehicles, workers must maintain at least three feet of physical distance and wear a face covering for source control.

Jobsite Face Covering Requirements

- Face coverings are required on construction jobsites when six feet of physical distancing cannot be maintained. This applies to both indoor and outdoor construction sites.
- You do NOT have to wear a face covering full time when working on an indoor construction jobsite. Only if you can not maintain six feet of physical distancing.
- Save the N95 respirators (face mask) for jobsite respiratory hazards and use as PPE. N95s with exhalation valves are not an accepted form of source control as the valve allows unfiltered air to escape.

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**Outdoor Jobsite Examples**

- A worker in a boom lift alone and not within six feet of another worker – Face covering is **NOT** required.
- Two workers tying rebar and working ten feet apart – Face covering **NOT** required.
- Two workers tying rebar and get within six feet apart – Face covering **IS** required. Must complete JHA and use the hierarchy of controls.
- A lone worker saw cutting with walk behind concrete saw – N95 Respirator required as PPE for the silica hazard. Worker now needs N95 respirator for PPE and not a face covering for source control.

**Indoor Jobsite Examples**

- Two workers installing cabinets and working four feet apart – Face covering **IS** required. Must complete JHA and use the hierarchy of controls.
- A worker installing water supply lines under a sink and working fifteen feet away from another worker – Face covering **NOT** required.
- Four workers in same room hanging drywall and working eight feet apart – Face covering **NOT** required.
- A lone worker using a tile saw to cut concrete tile then walk into room to place the tile with another worker – N95 Respirator required as PPE for the silica hazard while cutting, then change to face covering when entering room to place the tile with another worker within six feet for source control.