



COVID-19 Exposure Prevention, Preparedness, and Response

Opp Construction takes the health and safety of our employees very seriously. The world is currently fighting the COVID-19 Pandemic. With the spread of the coronavirus or “COVID-19,” a respiratory disease caused by the SARS-CoV-2 virus, Opp Construction must remain vigilant in mitigating the outbreak. Opp Construction is a proud part of the construction industry, which many have deemed “essential” during this Declared National Emergency. In order to be safe and maintain operations, we have developed this COVID-19 Exposure Prevention, Preparedness, and Response Plan to be implemented, to the extent feasible and appropriate, throughout Opp Construction and at all of our jobsites. Opp Construction has also identified a team of employees to monitor the related guidance that U.S. Center for Disease Control and Prevention (“CDC”) and Occupational Safety and Health Administration (“OSHA”) continue to make available.

This Plan is based on information available from the CDC and OSHA at the time of its development, and is subject to change based on further information provided by the CDC, OSHA, and other public officials. This along with other emergency communication strategies should be periodically tested to ensure it is effective and workable. Opp Construction may also amend this Plan based on operational needs.

I. Responsibilities of Managers and Supervisors

All managers and supervisors must be familiar with this Plan and be ready to answer questions from employees. Managers and supervisors must set a good example by following this Plan at all times. This involves practicing good personal hygiene and jobsite safety practices to prevent the spread of the virus. Managers and supervisors must encourage this same behavior from all employees.

Sally Miskavige is responsible for dealing with disease issues & their impact at the worksite. She is the pandemic disease containment plan coordinator. She will be responsible for communicating with the local health departments and health care providers if it becomes necessary. She will head up developing & implementing protocols for response to ill individuals. Key contacts, a chain of communication and contact number for employees, and a process for tracking business and employee status will be developed & maintained at all



times. Sally will also identify learning opportunities and take action to implement any corrective actions based on information gained following the pandemic event.

Periodic training on illness prevention, initial disease symptoms how to avoid spread of disease, when it is appropriate to return to work & company policies concerning illnesses will be developed & communicated company wide. Employees will be encouraged to obtain appropriate immunizations to help avoid disease. We will grant time off work to obtain the vaccine when they become available. Communicating information with non-English speaking employees or those with disabilities will be considered.

II. Responsibilities of Employees

Opp Construction is asking every one of our employees to help with our prevention efforts while at work. In order to minimize the spread of COVID-19 at our jobsites, everyone must play their part. As set forth below, Opp Construction has instituted various housekeeping, social distancing, and other best practices at our jobsites. All employees must follow these. In addition, employees are expected to report to their managers or supervisors if they are experiencing signs or symptoms of COVID-19, as described below. If you have a specific question about this Plan or COVID-19, please ask your manager or supervisor. If they cannot answer the question, please contact Shaylee Brien, Human Resource Manager at 701-740-5429 or shayleebrien@oppconstruction.com

OSHA and the CDC have provided the following control and preventative guidance for all workers, regardless of exposure risk:

- Frequently wash your hands with soap and water for at least 20 seconds. When soap and running water are unavailable, use an alcohol-based hand rub with at least 60% alcohol. Hands must be clean for alcohol-based hand rub to have full effect.
- Avoid touching your eyes, nose, or mouth with unwashed hands.
- Wearing cloth face coverings at work when other social distancing measures are difficult to maintain.
- Follow appropriate respiratory etiquette, which includes covering for coughs and sneezes. Do not cough into your hand, instead use inside of elbow or tissue.



- Avoid close contact with people who are sick.

In addition, employees must familiarize themselves with the symptoms of COVID-19, which include the following:

- Coughing;
- Fever;
- Shortness of breath, difficulty breathing; and
- Early symptoms such as chills, body aches, sore throat, headache, diarrhea, nausea/vomiting, and runny nose.

If you develop a fever and symptoms of respiratory illness, such as cough or shortness of breath, **DO NOT GO TO WORK** and call your supervisor and healthcare provider right away. Likewise, if you come into close contact with someone showing these symptoms, call your supervisor and healthcare provider right away.

III. Job Site Protective Measures

Opp Construction has instituted the following protective measures at all jobsites.

A. *General Safety Policies and Rules*

- Any employee/contractor/visitor showing symptoms of COVID-19 will be asked to leave the jobsite and return home.
- Safety meetings will be by zoom or telephone, if possible. If safety meetings are conducted in-person, attendance will be collected verbally and the foreman/superintendent will sign-in each attendee. Attendance will not be tracked through passed-around sign-in sheets. During any in-person safety meetings, avoid gathering in groups of more than 10 people and participants must remain at least ten (10) feet apart. All in-person meetings must be limited.
- Employees must avoid physical contact with others and shall direct others (co-workers/contractors/visitors) to increase personal space to at least ten (10) feet,



where possible. Where work trailers are used, only necessary employees should enter the trailers and all employees should maintain social distancing while inside the trailers. If physical distance of 10 feet can't be maintained, all parties must wear face coverings.

- Foreman should schedule their start time to allow for staggered pickup times for materials & equipment. Patio World, the Shop & the Office will coordinate your pickup of needed items.
- Employees will be encouraged to stagger breaks and lunches, if practicable, to reduce the size of any group at any one time to less than ten (10) people. Distance rules apply during lunch break, sitting adjacent to & spacing of 10' must be maintained. Properly wash hands prior to returning to work.
- Foreman are responsible for working with supervisors & the shop to make sure there is access to hand washing stations at each jobsite. Several prototypes are available to choose from. Opp Construction understands that due to the nature of our work, access to running water for hand washing may be impracticable. In these rare situations, Opp Construction will provide, if available, alcohol-based hand sanitizers and/or wipes. Foreman also are responsible to make sure that hand soap, disposable towels & no touch trash cans are available at the job sites.
- Employees should limit the use of co-workers' tools and equipment. To the extent tools must be shared, Opp Construction will provide a cleaning solution to clean tools before and after use. When cleaning tools and equipment, consult manufacturing recommendations for proper cleaning techniques and restrictions.
- Employees are encouraged to limit the need for N95 respirator use, by using engineering and work practice controls to minimize dust. Such controls include the use of water delivery and dust collection systems, as well as limiting exposure time.
- Opp Construction will divide larger crews/staff into smaller groups where possible so that projects can continue working effectively if one of the divided teams is required to quarantine.
- As part of the division of crews/staff, Opp Construction will divide employees into dedicated shifts, at which point employees will remain with their dedicated shifts for the remainder of the project. If there is a legitimate reason for an



employee to change shifts, Opp Construction will have sole discretion in making that alteration.

- Employees are encouraged to minimize ride-sharing. While in vehicles, employees must ensure adequate ventilation & wear cloth face coverings as recommended by the CDC. Employees who ride share must be part of the same working group.
- If practical, each employee should use/drive the same truck or piece of equipment every shift.
- In lieu of using a common source of drinking water, such as a cooler, employees should use individual water bottles. Employees are encouraged to remain on the jobsite during lunch break & bring their own sack lunch to reduce exposure when traveling to the public to get lunch. Remember, if you do have to leave the jobsite use proper hygiene methods & properly wash your hands.

Opp Construction office, shop & outbuildings will be maintained by limited staff. Please contact your supervisor & have them handle coordinating anything needed from the office, shop or outbuildings & follow their direction.

B. Workers entering Occupied Building and Homes

- Construction and maintenance activities within occupied homes, office buildings, and other establishments, present unique hazards with regards to COVID-19 exposures. Everyone working within such establishments should evaluate the specific hazards when determining best practices related to COVID-19.
- During this work, employees must sanitize the work areas upon arrival, throughout the workday, and immediately before departure. Opp Construction will provide cleaning solution or alcohol-based wipes for this purpose.
- Employees should ask other occupants to keep a personal distance of ten (10) feet at a minimum & in addition all parties must have cloth face coverings if occupying the same space. Shoe coverings should be worn when entering homeowners' personal space, proper hygiene techniques should be taken when putting shoe coverings on & off. Workers should wash or sanitize hands immediately before starting and after completing the work.



C. Job Site Visitors

- The number of visitors to the job site, including the trailer or office, will be limited to only those necessary for the work.
- All visitors should be screened by the Foreman on site in advance of arriving on the job site. If the visitor answers “yes” to any of the following questions, they should not be permitted to access the jobsite:
 - Have you or any of your close contacts been confirmed positive for COVID-19?
 - Are you or any of your close contacts currently experiencing, or recently experienced, any acute respiratory illness symptoms such as fever, cough, or shortness of breath?
- If the visitor answers “yes” the following question, the visitor must wear a face covering at all times while on our jobsite:
 - Are you or your close contacts considered at high risk for contracting COVID-19 such as someone who has traveled domestically, healthcare worker or other persons in contact with large number of individuals?
- Site deliveries will be permitted but should be properly coordinated in line with the employer’s minimal contact and cleaning protocols. Delivery personnel should remain in their vehicles if at all possible.

D. Personal Protective Equipment and Work Practice Controls

- In addition to regular PPE for workers engaged in various tasks (fall protection, hard hats, hearing protection), Opp Construction will also provide:
 - Gloves: Gloves should be worn at all times while on-site. The type of glove worn should be appropriate to the task. If gloves are not typically required for the task, then any type of glove is acceptable, including latex gloves. Employees should avoid sharing gloves.
 - Eye protection: Eye protection should be worn at all times while on-site.



- If it becomes necessary to work within 10', employees must use something to cover their mouth & nose, such as a bandana. CDC recommendations on proper removal & storage of masks must be trained & used by all employees.
- **NOTE:** The CDC is currently not recommending that healthy people wear N95 respirators to prevent the spread of COVID-19. Nevertheless, employees must wear N95 respirators if required by the work and if available.
- Due to the current shortage of N95 respirators, the following Work Practice Controls should be followed:
 - Keep dust down by using engineering and work practice controls, specifically through the use of water delivery and dust collection systems.
 - Limit exposure time to the extent practicable.
 - Isolate workers in dusty operations by using a containment structure or distance to limit dust exposure to those employees who are conducting the tasks, thereby protecting nonessential workers and bystanders.
- Institute a rigorous housekeeping program to reduce dust levels on the jobsite.

IV. Job Site Cleaning and Disinfecting

Opp Construction has instituted regular housekeeping practices, which include cleaning and disinfecting frequently used tools and equipment, and other elements of the work environment, where possible. Employees should regularly do the same in their assigned work areas.

- Jobsite trailers and break/lunchroom areas will be cleaned at least once per day prior to the start of the work day. Employees performing cleaning will be issued proper personal protective equipment (“PPE”), such as nitrile, latex, or vinyl gloves and gowns, as recommended by the CDC.



Please read the SDS sheet for the chemical you are using & make sure to use it properly. Many must be left on for a period before they are wiped off & may be best to let dry on its own. Also note that items must be cleaned prior to being able to disinfect -you can't disinfect dirt, dust, grime, etc. A clean jobsite is a safe & happy jobsite.

- Any trash collected from the jobsite must be changed frequently by someone wearing nitrile, latex, or vinyl gloves.
- Any portable jobsite toilets should be cleaned by the leasing company at least twice per week and disinfected on the inside. Opp Construction will ensure that hand sanitizer dispensers are always filled. Frequently touched items (i.e. door pulls and toilet seats) will be disinfected after each use & this should be directed by the site Foreman.
- Vehicles and equipment/tools should be cleaned at least once per day and before change in operator or rider.
- OSHA has indicated that a reliable report that an employee has tested positive for COVID-19 does not typically require an employer to perform special cleaning or decontamination of work environments, unless those environments are visibly contaminated with blood or other bodily fluids. Notwithstanding this, Opp Construction will clean those areas of the jobsite that a confirmed-positive individual may have contacted and it will do so before employees can access that work space again.
- Opp Construction will ensure that any disinfection shall be conducted using one of the following:
 - Common EPA household disinfectant;
 - Alcohol solution with at least 60% alcohol; or
 - Diluted household bleach solutions (if appropriate for the surface).
- Opp Construction will maintain Safety Data Sheets of all disinfectants used on site.



V. Jobsite Exposure Situations

- **Employee Exhibits COVID-19 Symptoms**

If an employee exhibits COVID-19 symptoms, the employee must remain at home until they are symptom free for 72 hours (3 full days) without the use of fever-reducing or other symptom-altering medicines (e.g., cough suppressants). Opp Construction will similarly require an employee who reports to work with symptoms to return home until they are free for 72 hours (3 full days). To the extent practical, employees are required to obtain a doctor's note clearing them to return to work.

- **Employee Tests Positive for COVID-19**

An employee who tests positive for COVID-19 will be directed to self-quarantine away from work. Employees that test positive and are symptom free may return to work when at least seven (7) days have passed since the date of their first positive test, and have not had a subsequent illness. Employees who test positive and are directed to care for themselves at home may return to work when: (1) at least 72 hours (3 full days) have passed since recovery;¹ and (2) at least seven (7) days have passed since symptoms first appeared. Employees who test positive and have been hospitalized may return to work when directed to do so by their medical care providers. Opp Construction will require an employee to provide documentation clearing their return to work.

- **Employee Has Close Contact with an Individual Who Has Tested Positive for COVID-19**

¹ Recovery is defined as: (1) resolution of fever with the use of fever-reducing medications and (2) improvement in respiratory symptoms (e.g., cough, shortness of breath).



Employees who have come into close contact with an individual who has tested positive for COVID-19 (co-worker or otherwise) will be directed to self-quarantine for 14 days from the last date of close contact with that individual. Close contact is defined as six (6) feet for a prolonged period of time.

If Opp Construction learns that an employee has tested positive, Opp Construction will conduct an investigation to determine co-workers who may have had close contact with the confirmed-positive employee in the prior 14 days and direct those individuals who have had close contact with the confirmed-positive employee to self-quarantine for 14 days from the last date of close contact with that employee. If applicable, Opp Construction will also notify any sub-contractors, vendors/suppliers or visitors who may have had close contact with the confirmed-positive employee. If an employee learns that they have come into close contact with a confirmed-positive individual outside of the workplace, they must alert a manager or supervisor of the close contact and self-quarantine for 14 days from the last date of close contact with that individual.

- **Work Operations**

During pandemic situations it may become necessary to adjust work arrangements to continue operations. Working from home for all Project Managers & Office Staff should be implemented prior to any major world wide outbreak of pandemic size. Crew's should be scheduled into pod groups & have limited contact to prevent the exposure of maximum size throughout our operation. Shops should be divided into extra warehouses to prevent the loss of a shop which has been designated as a critical operation. Flexible work policies will be implemented & workers should be encouraged to stay at home when ill, when having to care for ill family members, or when caring for children when schools close, without fear of reprisal. Business continuity plans should be prepared so if significant absenteeism or changes in business practices are required business operations can be effectively maintained. Work-from home strategies should be put in place.

VI. OSHA Recordkeeping

If a confirmed case of COVID-19 is reported, Opp Construction will determine if it meets the criteria for recordability and reportability under OSHA's recordkeeping rule. OSHA requires construction employers to record work-related injuries and illnesses that meet certain severity criteria on the OSHA 300 Log, as well as complete the OSHA Form 301 (or equivalent) upon the occurrence of these injuries. For purposes of COVID-19, OSHA also



requires employers to report to OSHA any work-related illness that (1) results in a fatality, or (2) results in the in-patient hospitalization of one or more employee. “In-patient” hospitalization is defined as a formal admission to the in-patient service of a hospital or clinic for care or treatment.

OSHA has made a determination that COVID-19 should *not* be excluded from coverage of the rule – like the common cold or the seasonal flu – and, thus, OSHA is considering it an “illness.” However, OSHA has stated that only confirmed cases of COVID-19 should be considered an illness under the rule. Thus, if an employee simply comes to work with symptoms consistent with COVID-19 but is not a confirmed diagnosis, the recordability analysis is not necessarily triggered at that time.

If an employee has a confirmed case of COVID-19, Opp Construction will conduct an assessment of any workplace exposures to determine if the case is work-related. Work-relatedness is presumed for illnesses that result from events or exposures in the work environment, unless it meets certain exceptions. One of those exceptions is that the illness involves signs or symptoms that surface at work but result solely from a non-work-related event or exposure that occurs *outside* of the work environment. Thus, if an employee develops COVID-19 *solely* from an exposure outside of the work environment, it would *not* be work-related, and thus not recordable.

Opp Construction’s assessment will consider the work environment itself, the type of work performed, the risk of person-to-person transmission given the work environment, and other factors such as community spread. Further, if an employee has a confirmed case of COVID-19 that is considered work-related, Opp Construction will report the case to OSHA if it results in a fatality within 30 days or an in-patient hospitalization within 24-hours of the exposure incident.

VII. Confidentiality/Privacy

Except for circumstances in which Opp Construction is legally required to report workplace occurrences of communicable disease, the confidentiality of all medical conditions will be maintained in accordance with applicable law and to the extent practical under the circumstances. When it is required, the number of persons who will be informed that an unnamed employee has tested positive will be kept to the minimum needed to comply with reporting requirements and to limit the potential for transmission to others. Opp Construction reserves the right to inform other employees that an unnamed co-worker has



been diagnosed with COVID-19 if the other employees might have been exposed to the disease so the employees may take measures to protect their own health. Opp Construction also reserves the right to inform sub-contractors, vendors/suppliers or visitors that an unnamed employee has been diagnosed with COVID-19 if they might have been exposed to the disease so those individuals may take measures to protect their own health.

VIII. General Questions

Given the fast-developing nature of the COVID-19 outbreak, Opp Construction may modify this Plan on a case by case basis. If you have any questions concerning this Plan, please contact Dave Opp, Chief Safety Director at 701-739-0188 or daveopp@oppconstruction.com.