Safety & Health Program

Safety Statement

Opp Construction is committed to safety excellence. We are striving for a world class safety program and continuous improvement in safety performance. We require that industry standards are met. Each team member and subcontractor is responsible for carrying out this philosophy and making safety their number one priority.

Safety is the responsibility of all team members and sub-contractors of Opp Construction. Management commitment, direction and support are required to achieve our safety objectives. Management is responsible to assure the services we provide are performed safely and that all team members and sub-contractors are aware of the hazards on the job and how to eliminate them.

This written safety program governs all operations of Opp Construction. It is not possible to address all work activities of potentially hazardous situations in a procedures manual. However, it is our intent to present key procedures and methods which Opp Construction expects to be utilized in accomplishing work. In addition, Opp Construction expects all team members and subcontractors to exhibit a safe and positive work attitude on the job site.

Opp Construction believes all incidents are preventable. Safety objectives are set at working 100% safe 100% of the time. All team members and subcontractors are expected to take every reasonable precaution to eliminate workplace incidents and to meet our goal of **ZERO** workplace accidents. No job is so urgent that it can't be done safely.

Opp Construction is committed to working together with all team members and subcontractors to ensure all workers will be able to return home safely at the end of each work day.

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Greg Opp
President

Contents

Aerial Lift / Elevating Work Platform

When using Aerial Lifts / Elevating Work Platforms (AL/EWP) you must:

1. Be trained and certified by Opp Construction in its operation.
2. Select the appropriate equipment for job tasks based upon the work-environment and job-task being preformed.
3. Conduct documented safety inspections and preventive maintenance of the equipment,
4. Assure operators adhere to specific safe-work practices whenever using these types of powered industrial equipment.

Pre-Operation Inspection and Use of Fall Protection

At the beginning of each work shift, or prior to using AL/EWP equipment for a new work assignment, the Operator conducts a documented "Pre-Operational Inspection" of the equipment. This inspection is specific to the type of lift equipment, and includes visual and auditory inspection of all safety and operational components of the equipment. Results of this inspection are documented on inspection checklists.
Some types of AL/EWP equipment require that fall protection must be worn and properly attached to the equipment by the operator of the equipment.

Operating Procedures / Hazard Identification and Controls

Prior to operation at the beginning of each work-shift, Operators must review and assess the following equipment/work area conditions:

1. Review work area for hazards and remove/control them prior to operation.
2. Always conduct an environmental hazard assessment prior to selecting / using AL/EWP equipment.
3. Only use AL/EWP equipment designed to safely work in the work-area conditions observed.
4. Review operating instructions, warnings, and precautions for the types of AL/EWP being operated.
5. Prior to operation at the beginning of the work-shift, inspect and document the equipment's proper function of controls and instrumentation. Do they operate correctly?
6. Inspect engine or motor operation.
7. Inspect steering and maneuvering.
8. Familiarize yourself with visibility.
9. Inspect basket or platform capacity and equipment stability.
10. Complete and document the inspection process using the appropriate inspection form.
11. Check fuel and/or charging of batteries and refuel/recharge as needed.
12. Review and understand equipment operating limitations.

13. Review other operating instructions, warnings, or precautions listed in the operator's manual for the types of AL/EWP that you will operate.

14. Alert all persons in the work area of intended work activities and hazards.

15. Always face the direction of travel.

16. Don't travel horizontally with the platform elevated or extended.

17. Don't exceed the basket or platform capacity.

18. Position equipment on a firm level surface and minimize blocks or ramps for leveling the AL/EWP equipment.

19. Always set outriggers prior to use if he AL/EWP is equipped with them.

20. When operating an AL/EWP requiring a safety harness wear a proper safety harnesses and only tie-off to the work platform's fall protection tie-off point.

21. "Barrier off" the lift swing work-area below the AL/EWP equipment's work zone.

22. Don't climb on guardrails, climb on ladders or stand on other items when working on the platform.

23. Practices good housekeeping when working in and around the platform.

24. Never drop or throw objects to or from the work platform.

25. Always look below platform and confirm it's safe to lower the equipment before lowering the equipment.

26. Never lean the platform on or against structures.

27. Never use the boom to push against something or try and pull the AL / EWP equipment along in a horizontal direction.

For broken or defective lifts, refer to Lock-out/Tag-out portion of program. Notify the shop mechanics before attempting to use.

Assured Equipment Grounding Conductor Program

The Assured Equipment Grounding Conductor Program (AEGCP) is put in place to minimize and eliminate hazards resulting from malfunctions, improper grounding and/or defective electrical tools. All team members are responsible for being aware of the hazards associated with work sites that have cord sets, receptacles (which are not a part of the permanent wiring of the building or structure) and equipment connected by cord. Only authorized personnel are permitted to repair, adjust, test or service electrical equipment. Opp Constructions Chief Safety Director, Dave Opp is the competent person responsible for the execution of this program and will review it annually.

Ground fault circuit interrupters (GFCI) are required on all portable generators and exterior receptacles. GFCI's on portable generators are to be checked prior to each day's use by the foreman on site. GFCI's that protect exterior/interior receptacles are to be tested monthly and the results documented by the maintenance manager.

Foremen are responsible for testing each cord set, attachment cap, receptacle of cord set and any equipment connected by cord and plug, (except those sets that are fixed and not exposed to damage) for external defects and possible damage prior to each days use. Testing is to be recorded on the Daily Job Site Inspection Form indicating name, date as well as each item that passed and any that did not, including the actions that were taken. Equipment that is damaged or defective is to be tagged out of service immediately and sent to the shop for repairs or replacement.

Types of tests:

-Test all equipment grounding conductors for continuity.

-Test each receptacle and attachment cap or plug for correct attachments of equipment grounding conductor.

Schedule of tests:

1. Before first use.
2. Before equipment is returned to service following repairs.
3. Before equipment is used after any incident which can be reasonably suspected to have caused damaged.
4. At intervals not to exceed three months. Exception: cord sets and receptacles which are fixed and not exposed to damage shall be tested at intervals not to exceed six months.

Records are to be maintained in the Foreman Packs and be available on each jobsite for inspection by OSHA and upper management.

Foremen are responsible for the safe condition of electrical tools and equipment and must ensure that all tools and equipment are maintained in the appropriate manner and taken out of service immediately for repair when defects are discovered or suspected.

OPP Based Safety

The OPP Based Safety Program is put in place to eliminate unsafe behaviors. In order for this program to be a success it is critical that there is Safety Through Everyone's Participation (STEP) where all employees are responsible for observing team members with concern instead of criticism and immediately stop and correct any unsafe behaviors.

All team members are responsible for being alert and aware on job sites and communicating hazards that may arise in the course of a job as well as unsafe behaviors. The Supervisor is responsible to document and give feedback regarding behaviors, and to reverse and correct behaviors if necessary. Feedback can consist of coaching, mentoring, praising and guiding their co-workers behavior or disciplinary action can be used to correct unsafe behaviors.

After the observation process the supervisor should discuss the observation with the team member and document the 'activator' or reason for acting unsafely as well as defining a

solution for the problem. A suggested method for discussion is to begin with a positive comment and discuss safe acts that the team member was performing. Next would be the appropriate time to give feedback where improvement is needed. Time for questions from the team member should be allowed.

Foremen should encourage and applaud safe behavior. Team members who show safe behaviors should be acknowledged for recognition in the company newsletter and for the monthly Caught in the Act Being SAFE award.

Supervisors are to be trained yearly on how to effectively administer feedback to enforce safe and positive behavior or to correct unsafe or negative behavior. Training should include the importance of documenting negative behaviors and the resulting disciplinary action on the Team Member Warning Notice Form that includes:

1. Who was involved in the incident.
2. The location of the incident.
3. What activity was being performed at the time of the incident.
4. The root cause of the incident.
5. How the incident could have been prevented.
6. How to prevent similar incident in the future.

Team member warning notices are electronically tracked in the safety matrix. The safety committee is responsible for reviewing the safety matrix monthly to identify trends and to identify training necessary to prevent the incidents from reoccurring. Training can come in the form of tool box training to be used in the field or it can be addressed at the annual spring or winter safety training.

Bloodborne Pathogens Awareness/Exposure Control Plan

The Bloodborne Pathogens program is put in place to protect team members from occupational exposure to bloodborne pathogens. The Chief Safety Director is responsible for the implementation of the Exposure Control Plan (ECP) and will maintain, review, and update the ECP at least annually, and whenever necessary to include new or modified tasks and procedures. A copy will be in the Operations Manual for review by any team member, state or federal official. Contact: Sally Miskavige – Grand Forks, ND, 701-775-3322

Team members who are determined to have occupational exposure to blood or other potentially infectious materials must comply with the procedures and work practices outlined in this ECP.

The Operations Manager is responsible for providing and maintaining all necessary personal protective equipment (PPE) & engineering controls at no cost to the team members; as well as ensuring that foremen have PPE available in the appropriate sizes in their foreman truck or trailer. The Hepatitis B Vaccine will be made available at no cost to all team members with

occupational exposure to bloodborne pathogens. Contact: Sally Miskavige – Grand Forks, ND 701-775-3322

The Chief Safety Director is responsible for ensuring that all medical actions required by OSHA are performed and that team member health and OSHA records are maintained. Foremen are responsible for maintaining their first aid kits and ensuring they are complete with additional PPE, such as antiseptic solutions and towelettes. Contact: Dave Opp Grand Forks, ND, 701-775-3322

The Human Resource Manager is responsible for training, documentation of training, and making the written ECP available to team members and OSHA representatives. Training is to occur during pre-employment orientation & on a yearly basis. Medical records for team members with occupational exposure are to be kept for the duration of employment plus 30 years. Training records are to be kept and maintained for three years from the date of training. Contact: Shaylee Brien, Grand Forks, ND, 701-775-3322

Team member Exposure Determination – During normal construction activities, team members do not have occupational exposure to bloodborne pathogens. There is a risk of contamination during unexpected injury or illness. The risk increases for those team members who have been trained in first aid/CPR. All team members are to utilize universal precautions and basic health practices. All body fluids should be considered potentially infectious. Should an incident occur follow the instructions in the Incident Procedure or contact Dave Opp, Chief Safety director at 701-775-3322.

If an incident occurs involving transfer of bodily fluid an immediate and confidential medical evaluation and follow-up will be conducted by the company's designated medical provider. Following initial first aid (clean the wound, flush eyes or other mucous membrane, etc) the following will occur:

1) Document the routes of exposure and how the exposure occurred.

2) Identify and document the source individual.

3) Obtain consent and make arrangements to have the source individual tested as soon as possible to determine HIV, HCV, and HBV infectivity, document test results and convey to source team member's health care provider.

4) If source individual is already known to be HIV, HCV and/or HBV positive, new testing need not be performed.

5) Assure that the exposed team member is provided with the source individual's test results and with information about applicable disclosure laws and regulations.

6)Opp Construction will make available within 10 days at no cost the hepatitis B vaccine and vaccination series to all employees who have an exposure incident.

Team members assigned to first aid duties are to ensure that, when feasible, the work area has been cleaned and that if there are any work surfaces that have been contaminated that they are decontaminated after contact with blood or other infectious materials.

Claims Management

The Claims Management Program seeks to minimize the human financial and material losses associated with every incident. In the event of an incident Opp Construction has arranged for a medical provider and will supply transportation to and from this provider if needed. All efforts will be made to return injured workers to work as soon as possible even if this is in a new position or modified duty which may require re-training.

Designated Medical Providers:

Altru Clinic – Occupational Health
1380 S Columbia Rd
Grand Forks, ND 58201
Dr. Paul Fleissner

Advanced Chiropractic Clinic
2840 19th Ave S
Grand Forks, ND 58201
Dr. Kevin Gruhot

Valley Vision Clinic
2200 South Washington Street
Grand Forks, ND 58201

Dr Engstrom & Associates
4731 13th Ave South #1
Fargo, ND 58103

Essentia Occupational Health
1401 13th Ave East
West Fargo, ND 58078

Syvrud Chiropractic Clinic
825 25th St S
Fargo, ND
Dr. Syvrud

Confined Space Entry Program

Definitions

Acceptable Entry Conditions - The conditions that must exist in a permit space to allow entry and to ensure team members can safely enter into and safely work within a permit required confined space.

Confined Space – A space that is large enough and so configured that a team member can bodily enter and perform assigned work, has limited or restricted means for entry or exit and is not designed for continuous team member occupancy.

Entry - The action by which a person passes through an opening into a permit required confined space. Entry is considered to occur as soon as any part of the entrant's body breaks the plane of an opening into the space. **NOTE:** For entry to occur there must be intent to bodily enter the

confined space. You may reach into a space, and not bodily enter (say to adjust a valve), and do so without an entry permit being required.

Entry Permit - The written or printed document provided by this company to allow and control entry into a permit space.

Entry Supervisor - The person responsible for determining if acceptable entry conditions are present at a permit space where entry is planned, for authorizing entry and overseeing entry operations, and for terminating entry.

Hazardous Atmosphere - An atmosphere that may expose team members to the risk of injury, death, incapacitation, impairment of ability to self-rescue, or acute illness from one or more of the following conditions:

- Flammable gas, vapor, or mist in excess of 10 percent of its lower flammable limit (LFL);

- Airborne combustible dust at a concentration that meets or exceeds its LFL. (This may be approximated as a condition in which the dust obscures vision at a distance of 5 feet or less);

- Atmospheric oxygen concentration below 19.5 percent or above 23.5 percent;

- Atmospheric concentration over the permissible limit of any substance for which a dose of permissible limit is published (in Subpart G Occupational Health and Environmental Control; or Subpart Z Hazardous and Toxic Substances); or

- Any other atmospheric condition that is immediately dangerous to life or health.

Non-Permit Confined Space - A confined space that does not contain or have the potential to contain any atmospheric hazard capable of causing death or serious physical harm.

Permit Required Confined Space (or Permit Space or Permit Required Space) - A confined space that contains or has a potential to contain a hazardous atmosphere, contains a material that has the potential for engulfing an entrant, has an internal configuration such that an entrant could be trapped or asphyxiated by inwardly converging walls or by a floor which slopes downward and tapers to a smaller cross section, or contains any other recognized serious safety or health hazard.

Prohibited Condition - Any condition in a permit space that is not allowed by the permit during the time when entry is authorized.

Testing - The process by which the hazards are identified and evaluated. Testing includes specifying the tests that are to be performed in the permit space.

This Confined Space Entry Program is established to identify, evaluate, and control confined spaces and to communicate and eliminate the risks associated with them. Opp Construction and its various work sites contain confined spaces that due to various chemical and physical properties could cause death or serious injury to team members who enter them. All team

members must be aware of this program including the hazards associated with confined spaces and how to eliminate them. The Chief Safety Director is responsible for reviewing this program on an annual basis.

All confined spaces should be identified prior to work beginning on the job site inspection (JSI) form. Due to the nature of our construction confined spaces that would be common are listed below.

- Inside storm and sanitary sewer manholes, trenches over 4' deep.

The following locations have been identified as permit required confined spaces, and may be entered ONLY after following the entry permit procedures outlined below:

- Grand Forks Asphalt Plant Tanks, inside hydro-seeder tank.

Opp Construction Supervisors must evaluate the jobsite and identify each confined space and determine whether a permit is required prior to beginning work. The results are to be documented on the Job Site Inspection Sheet. Supervisors are also responsible for informing all team members of the existence, location of, and danger posed by the confined space after identification and prior to work beginning. Permit required confined spaces require the posting of danger signs in addition. Supervisors must then determine if team members will or will not enter permit required space. If not, effective measures must be taken to prevent team members from entering the permit spaces.

The Human Resource Manger is responsible for providing documented training prior to initial job assignment and on an annual basis for entrants, attendants & entry supervisors. No Opp Construction team member is authorized for in-house rescue.

Designate the appropriate supervisor(s) as entry supervisor(s).

The Vice President is responsible for providing all equipment required for entry in a confined space at no cost. Team members are responsible to maintain that equipment properly, and supervisors must ensure that team members use that equipment properly.

When acting as host employer for a contractor performing permit space entry work the Chief Safety Director is responsible to:

1. Inform contractor of permit space entry program.

2. Notify the contractor of hazards of the particular permit space and the precautions and procedures implemented for protection of team members in or near permit spaces.

3. Coordinate entry operations with contractor when both will be working in or near permit spaces and debrief contractor after entries.

4. Obtain information from contractor of permit program to be followed and coordinate multiple entry operations.

5. Debrief contractors of the hazards encountered or created.

It may be necessary to reclassify a non-permit confined space as a permit space when there are changes in use or configuration.

No space that is immediately dangerous to life and health will be entered under any condition. Permit required confined spaces must only be entered into after specific authorization from an entry supervisor. Prior to entry into permit required spaces, all required trainings must be conducted.

PERMIT REQUIRED CONFINED SPACE ENTRY PROGRAM AND PROCEDURES

All permit required confined spaces will be identified by the Chief Safety Director. The Chief Safety Director is responsible for ensuring all spaces have posted warning signs and all team members exposed to the area are informed of such spaces and properly trained.

Only trained, qualified, and authorized team members will be allowed to be permit space entrants, attendants, or entry supervisors. Documented training must occur prior to initial job assignment, after a change in assigned duties, if a new hazard has been created or special deviations have occurred. Documentation should be available for review within 1 business day and include the date & time of training as well as the trainer's name, trainee's name & signature.

No team member shall enter a permit space without having a properly completed entry permit signed by the entry supervisor.

Prior to entry:

a. Entrants are responsible for obtaining an entry permit from the Chief Safety Director prior to entry of the space. The entrant is also responsible for hazard control/elimination actions including but not limited to, atmospheric testing, having all required equipment on hand, controlling external hazards such as pedestrian and vehicle traffic and providing for attendant and rescue services.

c. Complete all items on the permit.

d. The entry will be authorized and the permit will be signed only by an authorized entry supervisor. If any item on the permit is checked as "NO" (meaning not yet completed or available), the permit will not be signed.

e. An attendant must be on duty outside the confined space at all times anyone is inside the space. At no time should a single attendant be monitoring more than one confined space at a time.

f. Entry may proceed. A copy of the entry permit will be placed outside the confined space until the permit has been cancelled by appropriate personnel.

Testing and Monitoring.

a. Test the space as necessary to determine if acceptable entry conditions exist before beginning entry operations. Initial testing of the atmosphere must be done from outside the confined space prior to any entry. If isolation of the space is infeasible because the space is large or part of a continuous system (such as a sewer), entry conditions will be continuously monitored where entrants are working. Monitoring can be taken at any time – additional times can be requested.

b. Test or monitor the permit space as necessary to determine if acceptable entry conditions are being maintained during the course of entry operations.

c. When testing for atmospheric hazards, test first for oxygen, then for combustible gases and vapors, and then for toxic gases and vapors. Parameters for non-hazardous atmospheres are:

(1). Oxygen between 19.5 and 23.5 percent;

(2). Flammability less than ten percent of the lower flammability limit (LFL).

(3). Toxicity less than the permissible exposure limit (PEL).

An authorized attendant must be present and monitoring the entry at all times. The attendant will not be assigned any other duties that may interfere with his attendant duties. Attendant duties are outlined below.

Equipment required for permit required confined space entry includes that equipment required for testing and monitoring; ventilating; communications between the entrant and attendant, and for summoning rescue; personal protection; lighting; barriers/shields for openings; means of ingress and egress; and any other equipment necessary for safe entry and rescue.

Rescue and emergency services:

a. Non-entry rescue is the preferred method for rescue of personnel from a permit required space. **Team members will not enter a permit space for rescue unless they have been specifically trained and equipped for such rescue.**

b. To facilitate non-entry rescue, retrieval systems or methods shall be used whenever an authorized entrant enters a permit space, unless the retrieval equipment would increase overall risk of injury or would not be of value to any rescue. Retrieval system requirements are:

1. Each entrant shall use a chest or full body harness with a retrieval line attached at the center of the back near shoulder level, or other appropriate point.

2. Other end of retrieval line shall be attached to a mechanical device or fixed point outside of permit space ready for immediate use. A mechanical device will be used to retrieve personnel from vertical type permit spaces more than five feet deep.

3. If injured entrant is exposed to any substance with a required SDS or similar document, that SDS or document will be made available to the medical facility treating entrant.

c. If rescue should become necessary, the attendant will:

1. Notify and summon the rescue team/service;

2. Attempt **non-entry** rescue procedures to the extent possible by the circumstances.

3. Monitor the situation and be ready to give rescuers information on how many victims and their status, what hazards, chemical types, concentrations, etc. are present.

d. Only designated personnel will enter permit spaces for rescue purposes. Each designated rescue team member will be trained on:

1. Use of personal protective and rescue equipment necessary for making the rescue from the permit space;

2. Performance of assigned rescue duties and also that training required of authorized entrants;

3. Basic first-aid and cardiopulmonary resuscitation (CPR). At least one member of the rescue team will hold current certification in first aid and CPR.

Each rescue team member will practice making permit space rescues at least once every 12 months, by means of simulated rescue operations and in spaces representative of the types of permit spaces from which rescue is to be performed.

Permits will be cancelled by the entry supervisor upon completion of the work, or when any prohibited condition arises. Permits cannot just be left to expire. Cancelled permits must be kept for the annual review.

Program Review: Cancelled entry permits will be retained on file for at least one year. The Permit Space Program will be reviewed within one year of each entry using these cancelled permits to revise the program as necessary to ensure team members are protected from permit space hazards. A single review covering all entries in the preceding year may be conducted.

DUTIES OF THE ENTRANT, ATTENDANT, AND ENTRY SUPERVISOR

Entrant

a. Know the hazards that may be faced, including the mode, signs or symptoms, and consequences of the exposure;

b. Properly use equipment as required. Respirators should be annually fit tested for each entrant to ensure proper brand and size. Harnesses need to be updated per the manufactures recommendation as well as properly maintained. Tri-pod entry/rescue devices need to be used.

c. Communicate with the attendant as necessary to enable the attendant to monitor entrant status and to alert entrants of the need to evacuate the space.

d. Alert the attendant whenever the entrant recognizes any warning sign or symptom of exposure to a dangerous situation, or detects a prohibited condition.

e. Exit from the permit space as quickly as possible whenever:

(1). An order to evacuate is given by the attendant or the entry supervisor, or an evacuation alarm is activated.

(2). The entrant recognizes any warning sign or symptom of exposure to a dangerous situation, or detects a prohibited condition.

Attendant

a. Know the hazards that may be faced during entry, including the mode, signs or symptoms, and consequences of the exposure.

b. Be aware of possible behavioral affects of hazard exposure.

c. Continuously maintain an accurate count and identity of authorized entrants.

d. Remain outside the permit space during entry operations until relieved by another attendant

e. Communicate with entrants as necessary to monitor entrant status and to alert entrants of the need to evacuate.

f. Monitor activities inside and outside space to determine if safe for entrants to remain in space and order evacuation when necessary.

g. Summon rescue and emergency services when assistance for emergency exit from permit space is necessary.

h. Take the following actions when unauthorized persons approach or enter a permit space while entry is underway:

(1). Warn them to stay away, or exit immediately if they have entered.

(2). Inform the entrants and entry supervisor if unauthorized persons enter the permit space.

i. Perform non-entry rescues as specified by company procedure.

j. Perform no duties that might interfere with their primary duty to monitor and protect authorized entrants.

Entry Supervisor

a. Know the hazards that may be faced during entry, including the mode, signs or symptoms, and consequences of the exposure.

b. Verify that acceptable conditions for entry exist before endorsing the permit and allowing entry to begin.

c. Terminate the entry and cancel the permit when entry operations are complete or a prohibited condition arises.

d. Verify that rescue services are available and the means for summoning them are operable.

e. Remove unauthorized individuals who enter or who attempt to enter the permit space.

f. Determine, whenever responsible and at appropriate intervals, that acceptable entry conditions are maintained.

TRAINING

Only trained and qualified team members may be authorized as entrant, attendant, entry supervisor, or in-house rescue team members. The training will establish proficiency in the duties required by this program so that the team member acquires the understanding, knowledge, and skill necessary for the safe performance of his/her duties.

Training must be completed before team member is assigned duties under this program, before there is a change in assigned duties and, whenever a supervisor has reason to believe either that there are deviations from permit space entry procedures or inadequacies in the team member's knowledge or use of this program.

Supervisors will certify that this training has been accomplished. The certification will contain the team member's name, signatures or initials of the trainers, and the dates of training. The certification will be kept on file.

ALTERNATE ENTRY PROCEDURES

Alternate entry procedures may only be used when the only hazard is an actual or potential hazardous atmosphere. If alternate entry procedures are used, no permits are needed, no attendant or supervisor is required, and rescue provisions need not be used. Training and a written certification are required.

Conditions To Be Met To Qualify For Alternate Procedures:

a. The only hazard posed by permit space is an actual or potential hazardous atmosphere. (See Note after the Permit Space Reclassification section.)

b. Continuous forced air ventilation alone is sufficient to maintain safe permit space.

c. Monitoring and inspection data that supports above demonstrations have been developed and documented.

d. If initial entry is necessary to obtain above data, it shall be performed in accordance with this program.

e. Documented determinations and supporting data will be made available to entrants.

Entry must be in accordance with the following requirements:

a. Any condition making it unsafe to remove an entrance cover shall be eliminated before removing the cover. When entrance covers are removed, the opening shall be promptly and effectively guarded.

b. Before entry, the internal atmosphere shall be tested with a calibrated direct-reading instrument, for the following conditions in the order given:

(1). Oxygen content: 19.5 - 23.5%

(2). Flammable gases and vapors: <= 10% of LFL

(3). Potential toxic air contaminants: < PEL

c. There may be no hazardous atmosphere within the space whenever any team member is inside the space.

d. Continuous forced air ventilation shall be used as follows:

(1). Entry not permitted until hazardous atmosphere is eliminated.

(2). Ventilation shall be directed to immediate areas where team members are or will be present and will continue until all team members have left the space;

(3). Air supply shall be from a clean source and may not increase hazards in the space.

e. The atmosphere within the space shall be periodically tested as necessary to ensure that ventilation is adequate. If hazardous atmosphere is detected during entry:

(1). Each team member shall leave space immediately;

(2). Space shall be evaluated to determine how hazardous atmosphere developed; and

(3). Measures must be taken to protect team members from hazardous atmosphere before any subsequent entry.

f. The entry supervisor will verify that the space is safe for entry and that all of the above requirements have been met. Such verification will be in writing to include the date, location of the space, and the signature of the person providing the certification, and shall be made available to each team member before entry.

PERMIT SPACE RECLASSIFICATION

A permit space may be reclassified as a non-permit space:

a. If there are no actual or potential atmospheric hazards and if all hazards within permit space are eliminated without entry, space may be reclassified for as long as the non-atmospheric hazards remain eliminated.

b. Hazards may be eliminated by such actions as purging or inerting tank/vessels of contaminants, emptying material from hoppers/bins, use of company lockout/tag procedures for electrical/ mechanical hazards. The control of atmospheric hazards through forced air ventilation does not constitute elimination of that hazard, it only controls the hazard. The preceding Alternate Entry Procedures must be used in such cases.

c. If entry is required to eliminate hazards, it shall be according to regulations and the space may be reclassified for as long as the hazards remain eliminated.

d. Entry supervisors will certify in writing that all hazards in permit space have been eliminated and make this document available to each entrant.

e. If hazards arise in declassified permit space, team member(s) shall exit and the safety director shall determine whether to reclassify space.

NOTE: A combination of reclassification procedures and alternate entry procedures (e.g. using lockout/tagout to eliminate a physical hazard, then continuous forced air to control an atmospheric hazard) may not be used together. Such spaces must be entered under the permit program.

WRITTEN PERMIT

The following information must be included in the written permit. The permit must be a standardized format for each entry.

1. The permit space to be entered.

2. The purpose of the entry.

3. The date and the authorized duration of the entry permit.

4. The authorized entrants within the permit space, by name or by such other means.

5. The personnel, by name, currently serving as attendants.

6. The individual, by name currently serving as entry supervisor, with space for signature or initials.

7. The hazards of the permit space to be entered.

8. The measures used to isolate the permit space and to eliminate or control permit space hazards before entry.

9. The acceptable entry conditions.

10. The results of initial and periodic tests, with the names or initials of the testers and when the tests were done.

11. The rescue and emergency services that can be summoned and the means for summoning them.

12. The communications procedures used by authorized entrants and attendants to maintain contact during the entry.

13. Equipment (such as personal protective equipment, testing, communications, alarm system, and rescue equipment) to be provided for compliance with this section.

14. Any other information which is necessary in order to ensure team member safety.

Attach to permit any additional permits, such as for hot work, that have been issued for work in the permit space.

Crystalline Silica Exposure Control Program

Exposure to crystalline silica, a chemical compound found in minerals, is very dangerous because it can cause serious lung diseases include a disease called silicosis. There are more than one million U.S. workers, including over 100,000 in high risk settings, who are exposed to crystalline silica when they work. These workers work in a wide range of industries that use silica, including construction.

Opp construction has created this program to reduce or eliminate workplace exposure to crystalline silica at its workplace.

Crystalline silica is usually contained in rocks and released via dust. The following activities may cause crystalline silica dust to be in the air:

Sawing, hammering, cutting, drilling, grinding, and chipping of concrete or masonry

Chipping, hammering, and drilling of rock

Dry sweeping or pressurized air blowing of concrete, rock, or sand dust

Crushing, loading, hauling, and dumping rock

Sandblasting

Demolition of concrete and masonry structures

The OSHA standard 29CFR 1926.1153 requires the permissible exposure limit (PEL) of silica dust particles (which are 100 times smaller than sand granules) be limited to 50 micrograms per cubic meter of air over a time weighted average (TWA) of 8 hours.

A representative of Opp Construction will inspect each worksite and work operation to determine if employees are/or have the potential to be exposed to silica above the PEL that a worker may safely be exposed to under OSHA regulations.

Opp Construction can use either one or both a control method laid out in **Table 1** of the OSHA construction standard and/or they can measure workers exposure to silica and independently decide which dust controls work best to limit exposures in their workplaces to the permissible exposure limit (PEL).

In order to do this testing employees must wear a cyclone assembly and sampling pump throughout the work shift for up to 8 hours. Dust samples will be collected from the worker's breathing zone. Air monitoring information and results will be made available to workers.

Regardless of which exposure control method is used Opp construction will identify the tasks that may involve the exposure and implement methods or controls to protect the workers, including procedures to restrict access to work areas where high exposures may occur. In addition Opp Construction will do the following:

Train workers on the health effects of silica exposure, workplace tasks that can expose them to silica, and ways to limit exposure.

Designate a **competent person** to implement the written exposure control plan.

Restrict **housekeeping** practices that expose workers to silica, such as use of compressed air without a ventilation system to capture the dust and dry sweeping, where effective, safe alternatives are available.

Use **dust controls** and safer work methods to protect workers from silica exposures above the PEL.

Provide **respirators** to workers when dust controls and safer work methods cannot limit exposures to the PEL.

Offer **medical exams**—including chest X-rays and lung function tests—every three years for workers who are required by the standard to

wear a respirator for 30 or more days per year.

Keep records of workers' silica exposure and medical exams.

Disciplinary Program

The Disciplinary Program is put in place to ensure all team members adhere to Opp Construction Policies and Procedures and are held accountable for their actions. The Human

Resource Department is available to assist team members and managers/supervisors with conflict resolution. Supervisors shall attempt to resolve differences as quickly and efficiently as possible. The Human Resource Department shall review all termination recommendations prior to final action.

Managers, Supervisors & Foreman are all responsible for maintaining compliance with rules, policies and procedures as well as appropriate team member performance and behavior.

Violations of company policy, safety violations and insubordination are all reasons for taking a form of disciplinary action. A safety violation is not adhering to company safety procedures, policies & rules including all written and verbal instructions. All team members must work under direct orders from their supervisor and wear the appropriate PPE and follow all safety guidelines by Opp Construction, Private Customers, ND & MNDOT & OSHA.

All safety violations should be addressed immediately. Any action below can be taken after supervisor first informs the team member of the rule or procedure that was broken and to correct the behavior. Remember all work areas must be physically inspected before work begins and on a regular basis to ensure that all safety rules and policies are being followed.

In determining the disciplinary action to be undertaken, all available information will be considered. Disciplinary action may vary from case to case. Disciplinary actions, which may be utilized, are as follows:

Need for Improvement: The manager/supervisor/foreman discuss the concern with the team member involved, as well as the direct supervisor. The crew that is working with the team member with the incident will be issued a Need for Improvement form citing the area of concern. The crew together fills out a re-training on the importance of the safety concern and turns it into the office with the next paperwork. The original document will be filed in the employees file who was performing the act that needed improvement and it will be tracked on the company matrix.

Oral Warning: The manager/supervisor/foreman formally discusses the concern with the team member and reminds the team member of the importance of the rule, performance or behavior standard. The team member is told in a formal manner what s/he must do to improve and the consequences of repeated violation. Foreman takes written note of the oral discussion in Journal or informs the Human Resource Manager.

Written Warning: The manager/supervisor/foreman formally talks to the team member and discusses the concern and the steps necessary for improvement. The team member is given a written warning which summarizes previous discussions, sets forth expectations for improvement, and alerts the team member that failure to improve may result in further disciplinary action including an unrequested leave of absence or termination. The original document is retained in the team member's personnel file.

Written Warning with Probation: The manager/supervisor/foreman formally talks to the team member and discusses the concern and the steps necessary for improvement. Probation can

last 45 or 90 days depending on the level of violation, during this time no raises will be given and any company or safety violations will be grounds for termination.

Unrequested Leave of Absence: The manager/supervisor/foreman talks to the team member, discusses the concern and reminds the team member of any past discussions of the concern as well as a plan of action which was to be followed. The team member is then advised that s/he is on an unrequested leave of absence without pay from **work for a period not to exceed 24 scheduled hours of work.** During the unrequested leave, the team member must decide whether s/he can continue to work for Opp following the established work rules, policies, procedures, performance, and behavior standards. The results of this meeting will be documented and placed in the team member's personnel file. The Superintendent, General Manager, and/or the Human Resource Manager shall be involved in the consultation with the manager/supervisor prior to the initiation of the decision to enforce a leave of absence.

Termination: Depending on the nature of the concern, termination may be the initial form of discipline or termination may occur after any or all of the preceding steps have been taken. Prior to termination of a team member, a manager/supervisor must review the decision with the Superintendent, General Manager, and/or the Human Resource Manager.

When disciplinary action other than termination is taken, a written summary of the disciplinary meeting should include consideration of the following:

Identification of the problem(s) citing specific examples;

A summary of prior conversations between the team member and the manager/supervisor regarding the problem(s);

A time table for improvement or changes and the consequences if significant improvement is not made;

Specific identification of what changes or improvements must be made for resolution of the problem(s).

Depending on the circumstances or nature of the concern, a disciplinary action should not remain active indefinitely. The decision as to whether a disciplinary action remains in the team member's personnel file is at the sole discretion of the team member's supervisor and/or the Human Resource Manager.

Any team member who feels the disciplinary action taken against him/her is inappropriate is encouraged to discuss the situation with his/her supervisor and/or the Human Resource Manager.

Electrical Safety Awareness

The purpose of the Electrical Safety Awareness program is to eliminate all hazards associated with electrical devices. All team members are responsible for being aware of the risk of electric shock and how to prevent it. Specific training on Electrical Safety Awareness pertaining to each

team member's area of work is to be completed prior to work assignment and on an annual basis.

Team members working near equipment or circuits which may be energized need to be aware of and utilize safe work practices to prevent electric shock. Safe work practices include: de-energizing the live parts of the circuit, locking out/tagging out disconnected elements and working at safe clearance distances. Team members working on or near exposed de-energized parts are to treat them as live circuits.

Team members working outdoors need to be aware of the risks of overhead power lines. All unqualified team members must maintain a clearance distance of at least 10 feet for voltages up to 50,000 volts. If the voltage is 50,000 volts or higher clearance shall be increased 4 inches for every 10,000 volts over that voltage.

Vehicles, equipment or long handled tools capable of having parts elevated to overhead lines can only be operated by qualified and authorized team members. Safe distances must be maintained according to the voltage chart in table S-5.

TABLE S-5 - APPROACH DISTANCES FOR QUALIFIED AND AUTHORIZED OPERATORS

TEAM MEMBERS - ALTERNATING CURRENT

Voltage range (phase to phase)	Minimum approach distance
300V and less	Avoid Contact
Over 300V, not over 750V	1 ft. 0 in. (30.5 cm).
Over 750V, not over 2kV	1 ft. 6 in. (46 cm).
Over 2kV, not over 15kV	2 ft. 0 in. (61 cm).
Over 15kV, not over 37kV	3 ft. 0 in. (91 cm).
Over 37kV, not over 87.5kV	3 ft. 6 in. (107 cm).
Over 87.5kV, not over 121kV	4 ft. 0 in. (122 cm).
Over 121kV, not over 140kV	4 ft. 6 in. (137 cm).

Team members are not to enter spaces containing exposed energized parts unless authorized by the Chief Safety Director. Authorized team members or subcontractors must not enter spaces containing exposed energized parts unless it is properly illuminated. Illumination must be sufficient to enable the work to be done safely. Where poor illumination or an obstruction precludes safe observation of the work to be performed, team members, authorized or otherwise, may not perform tasks near exposed energized parts. Team members may not reach blindly into areas which may contain energized parts.

Team members are not allowed to enter into confined spaces unless explicitly authorized to do so. In the instance that an authorized team member needs to enter a confined or enclosed space that contains exposed energized parts, the operations manager is responsible for providing the team member with protective shields, protective barriers, or insulating materials

as necessary to avoid inadvertent contact with these parts. Doors, hinged panels and similar items shall be secured to prevent their swinging and causing the team member to contact exposed energized conductors.

All portable ladders must have nonconductive side rails if they are used where team members or the ladder could contact exposed energized parts.

Team members are prohibited from wearing conductive apparel such as watches, bands, bracelets, rings, key chains, necklaces, anything with conductive thread, or metal headgear when working near energized parts. If such articles must be worn when the team member is working near energized parts, they must be rendered nonconductive by covering, wrapping or other insulating means.

The Chief Safety Director is responsible for reviewing this policy annually.

Emergency Action Plan

The purpose of the Emergency Action Plan is to ensure that in the event of an emergency all efforts are made to eliminate injury and damages. Emergencies can come in many forms; all team members must be prepared for fire, toxic chemical releases, medical crisis, tornadoes, storms containing lightening, blizzards, floods, and any other unpredictable life threatening event.

Work site:

All emergencies on work sites that threaten the life of anyone require immediate notification to 911 or the first responder and securing the immediate area.

Notify the direct supervisor as soon as possible.

If it is necessary, make sure to evacuate the area and get to a secure location. Notify the direct supervisor of your transfer location.

All emergencies that could produce effects of becoming life threatening, such as storms containing lightening, tornado warnings, blizzards and floods, require that all team members seek shelter immediately. Only team members specifically authorized and trained on the hazards of the elements are allowed to work during blizzard or flood conditions and must be fighting the elements for the greater good of the community.

Office buildings emergencies:

Employees are alerted by the sounding of an alarm and/or verbal announcement.

Office manager will immediately call 911 or 1st responder

In the event of a fire, alarms will sound. All employees shall evacuate immediately by means of the nearest available marked exit. Employees should make sure all employees and customers

are evacuated from building.

In the event of any other emergency, instructions will be given by the office manager in charge as to what actions to take. All employees should follow the instructions of the office manager on site for getting to a safe zone.

In the event of a power outage, the emergency lighting system will turn on.

Portable fire extinguishers are provided in the workplace for employee use. In the event of fire, any employee may use extinguishers to attempt to extinguish the fire before evacuating. Training on the use of fire extinguishers will be annual. All fire extinguishers are inspected monthly during our audits and vehicle fire extinguishers are inspected during each pre trip. In addition, all fire extinguishers are re certified annually.

Critical operations shutdown procedures are not required, because no employees are authorized to delay evacuation for this purpose.

Any employee who is certified in CPR/1st Aid training may use their medical training in the case of an emergency.

After an emergency evacuation, employees are to gather in the following location: Fargo: Gather South of the main entrance to the office, stay on the concrete and meet at the south east corner of slab. Grand Forks: Gather east of the main entrance to the office, stay on the concrete and meet at the Patio World sign located in the ditch.

The Office Manager on site is responsible for accounting for all employees in the event of an emergency evacuation.

Asphalt Plant emergencies:

Employees are alerted by the sounding of an alarm and/or verbal announcement.

Plant Manager will immediately call 911 or 1st responder

In the event of a fire, alarms will sound. All employees shall evacuate immediately by means of the nearest available marked exit. Employees should make sure all employees and customers are evacuated from building.

In the event of any other emergency, instructions will be given by the plant manager in charge as to what actions to take. All employees should follow the instructions of the plant manager on site for getting to a safe zone.

Portable fire extinguishers are provided in the workplace for employee use. In the event of fire, any employee may use extinguishers to attempt to extinguish the fire before evacuating.

Critical operations shutdown procedures are not required, because no employees are authorized to delay evacuation for this purpose.

Any employee who is certified in CPR/1st Aid training may use their medical training in the case of an emergency.

After an emergency evacuation, employees are to gather in the following location: Gather at the West Gate.

The Plant Manager on site is responsible for accounting for all employees in the event of an emergency evacuation.

Training on this program should occur on a yearly basis and be signed and documented and kept by the Human Resource Manager.

For further assistance with emergency evacuation procedures, the following individuals may be contacted:

Shaylee Brien - Human Resources - 701-775-3322
Greg Schroeder – Safety Director – 701-730-6512
Dave Opp – Chief Safety Director - 701-739-0188

Ergonomics Program

Opp Construction's Ergonomics Program is put in place to eliminate strain and sprain injuries. All team members must comply with the ergonomics program and be familiar with its contents. Training on safe lift techniques as well as the contents of the ergonomics Program is to be completed during pre-employment orientation and at least annually thereafter.

Stretching warms up muscles to help prevent strain and sprain. All team members must participate in daily group stretching. Foremen are responsible for recording stretching participation and ensuring that all team members are stretching on a daily basis. The stretching guides provided offer a suggested stretching routine. Each team member may do any stretches they prefer and should adjust to personal abilities.

The following activities have been recognized as ergonomic hazards.

Manual Lifting: Prior to manually lifting, a hazard assessment must be completed. The assessment must include determining the size, bulk, weight of the object, if mechanical lifting is required, if two man lifting is required, whether the path is clear, if vision is obstructed while carrying the object, if the path has any tripping hazards and the conditions of the walking surface.

Training on safe lift techniques should be completed prior to initial assignment and on an annual basis. It should include at a minimum: safe lifting work practices, hazards and controls, proper ergonomics, procedures for proper stretching techniques, having the appropriate PPE such as gloves, boots and back support. Training is to be interactive and should include case studies of previous injuries within the industry.

Project Managers are responsible to ensure that means of mechanical lifting are available to crews who will be working on projects where the need to lift considerably heavy objects can be anticipated. Dingo's, skid steers, forklifts and mini pay loaders amongst other pieces of equipment are to be used to minimize manual lifting needs. Project managers are responsible for proper planning to ensure mechanical lifting is utilized when needed, should the need arise unexpectedly; team members may leave the job site to get the proper equipment. When an item falls between manual lifting and mechanical lifting, assisted manual lifting should be utilized. Use of wheelbarrows, paving stone movers is also recommended. Should the use of lifting equipment be impractical and the load would suggest to use mechanical lifting two-man lifting must be used. Supervisors are responsible for enforcing the use of provided lifting equipment.

Curb Building: When building curb by hand, back support and knee pads could be worn. Proper form must be used when bending and working to eliminate the overuse of the lower back. Knees are to be kept bent to keep back vertically straight and as much work as possible should be done from an upright position.

Bull Floating: When bull floating, back support and gloves could be worn. Hustler floats are to be used for pours over 12' wide.

Kneeling on pavement: Knee pads must be worn when kneeling on pavement. Walking tools such as edgers and floats are to be used whenever possible. Make sure the area has been swept prior to kneeling to prevent a rough surface.

Wading in concrete and shoveling: Avoid sudden movements when stepping or turning in wet concrete. Make sure to lift feet out of concrete completely when stepping. When shoveling make sure to keep your knees bent and switch positions. Strains and sprains are more probable when the body is repeatedly twisting and in awkward positions. Try to avoid walking backwards.

Wheelbarrow Operation: Team members should walk the wheelbarrows intended path prior to operating to ensure that there are no obstructions or hazards. Wheelbarrows should never be overloaded and the load should be balanced to avoid tipping. When lifting, keep back straight, bend knees, keep a firm grip and lean forward a little when beginning to lift. During the entire process, shoulders must be kept square, back straight, with legs and upper body doing the work, not the back. When load is ready to be dumped, raise handles until weight is on nose and then catch handles when they are vertical. The grip is switched during this motion. Never run with an empty or loaded wheelbarrow and proceed slowly when working on inclines. Use plywood to cover paths when wheeling on rough or soft terrain.

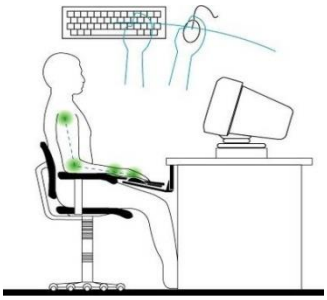
Stepping in and out of equipment: Use all steps and hand rails provided - commonly referred to as the three point rule, keep three out of four hands and feet in contact at all times. Never jump down or race up into equipment or trucks. Weight should slowly be put onto the ground and caution should be taken to watch for muddy or slippery steps or rough terrain. If the need for being in equipment for long hours is required make sure to exit periodically to stretch.

Operating hand equipment and tools: Make sure you are using the appropriate tool for the job. Tools can get caught in construction materials such as imbedded in rebar causing jarring. Make sure your body is in a safe position so that strains and sprains will be prevented.

Office Hazards:

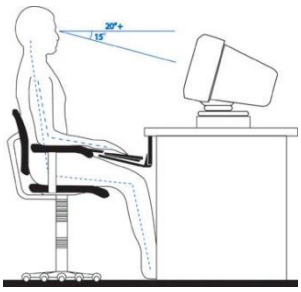
1. The Keyboard: Position the keyboard slightly below the elbow and at a negative angle to allow the wrists to remain straight when you sit in a slightly reclined posture. Do NOT use a wrist rest while actively typing. It is meant to rest on not to lean on while typing. Do NOT use the keyboard supports to raise the back up. Do NOT tilt the keyboard tray so that the back is higher than the front. A negative angle allows the wrist to stay in their natural wrist position. A positive angle, shown in illustration 1 at left, is a repetitive stress injury waiting to happen.

1



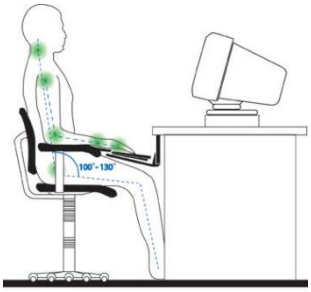
2. The Mouse: Place the mouse on the same level as and immediately next to the keyboard tray. Keep the mouse in the arc line of the keyboard so that you can reach it when rotating your arm from the elbow. Do NOT use a wrist rest while using the mouse. Your forearm needs to be free to move so you don't strain the wrist. Illustration 2 shows the proper position.

2



3. The Monitor: Position the monitor to minimize glare by placing it at a right angle to light sources or windows. Keep as far away from you as possible while maintaining the ability to read without consciously focusing. Keep a minimum of 20 inches. Place the center of the screen at a 15 degree down angle from your eyes with your neck only slightly bent holding your head perpendicular to the floor. Align the monitor and keyboard/mouse. Set the refresh rate at a minimum of 70 Hz to limit flicker. (Illustration 3)

3



4. The Chair: Use arm rests. Place lumbar support slightly below the waist line. Adjust height of chair so your feet rest comfortably on the floor. Allow 1-3” between the edge of the seat and the back of your knees. Use a high back chair that supports your shoulder blades if at all possible. (Illustration 4)

4

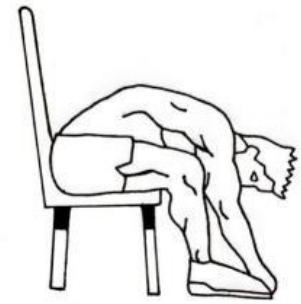
Office Stretching

Purpose: To stretch and increase range of motion in upper body.

Desired Response: Upper body will have less pain and greater range of motion and use.

Keep your fingers relaxed. Stretch your arms above your head and interlock your fingers with your palms up. Hold for 10 seconds.

Use arm to pull an elbow toward its opposite shoulder hold for 10 seconds. Repeat on other side.
Use one arm to pull an elbow behind your head. Tilt your body from your hip to one side. Hold for 10 seconds. Repeat on the other side.



Start by sitting on a strong, secure chair. Lift your arms up in front of you and slowly bend down and gradually reach for your feet. Try to feel for the stretch in the lower back area while holding this position for about 20 seconds. If this is easy you can try positioning the feet further away at the start of the stretch. Bending over with your feet further away will cause more stretch in the whole back.

The shoulders and neck hold a lot of stress and tension from typing, clicking and scrunching. Shoulder shrugs are a great way to relax the shoulders and get a little circulation going.

Do it right: Seated or standing, lift the shoulders up towards the ears, squeezing them as hard as you can. Hold for 1-2 seconds and roll them back as you relax down. Repeat for 8-10 reps.

The upper back can also become tense and tight from hunched shoulders, especially if you hold the phone against your shoulder or use your mouse a lot. The shoulder rolls above may help loosen you up for this upper back stretch.

Do it right: Seated or standing, stretch the arms straight out and rotate the hands so that the palms face away from each other. Cross the arms so that the palms are pressed together, contract the abs and round the back, reaching away as you relax the head. Don't collapse but instead imagine you're curving up and over an imaginary ball. Hold the stretch for 10-30 seconds. If twisting the arms doesn't feel good, simply lace the fingers together.

Sitting for prolonged periods of time can also affect the lower back, leaving it tight and achy. This stretch will help gently work out some of that tension.

Do it right: In a seated position with the feet flat on the floor, contract the abs and gently twist the torso towards the right, using your hands to help deepen the stretch. Only twist as far as you comfortably can and keep the back straight while keeping the hips square. Hold for 10-30 seconds and repeat on the other side.

Even if you pay attention to your posture, you may find yourself sinking back into a hunched position, which can make your back ache. This simple move will stretch all the muscles in your back, sides and arms.

Do it right: Seated or standing, lace the fingers together and stretch them up towards the ceiling. Take a deep breath as you stretch up as high as you can, then exhale and open the arms, sweeping them back down. Repeat for 8-10 reps.

You may not even realize how tight your forearms can get from typing until you stretch them out. This simple move helps stretch those muscles in the forearms and wrists.

Do it right: Seated or standing, stretch the right arm out and turn the hand down so that the fingers point towards the floor. Use the left hand to gently pull the fingers towards you, feeling a stretch in the forearm. Hold for 10-30 seconds and repeat on the other hand.

Holding tension in the neck can lead to headaches and upper back tension as well. Many of us drop the head forward when working on the computer, which can put extra stress on the neck muscles. This stretch feels great on the neck and shoulders.

Do it right: Sitting in your chair, reach down and grab the side of the chair with the right hand and gently pull while tilting your head to the left, feeling a stretch down the right side of the neck and shoulder. Hold for 10-30 seconds and repeat on the other side.

The lower body also gets tight from sitting too much, especially the front of the hips. When you sit, the glutes stretch while the hip flexors get tighter. Stretching this area several times a day can help reduce that tightness.

Do it right: While standing, take the right leg back as though you're going to do a lunge. Squeeze the glutes as you bend the knees, lowering down until you feel a stretch in the front of the right hip. Hold for 10-30 seconds and repeat on the other side.

This move helps open up the hips and stretch the complex series of muscles in the hips and glutes.

Do it right: While seated, cross the right ankle over the left knee and sit up nice and tall. Gently lean forward, keeping the back straight and reaching out with the torso until you feel a stretch in the right glute and hip. You can also press down on the right knee to deepen the stretch. Hold for 10-30 seconds and repeat on the other side.

This stretch feels great on the inner thighs, hips and groin and is another hip-opening move that may help get rid of tension and stress in the lower body.

Do it right: While seated, take the legs wide, toes out and lean forward with the elbows on the thighs. Keep the back straight and the abs contracted. Gently press forward while using the elbows to push the thighs out until you feel a stretch in the inner thighs. Hold for 10-30 seconds.

Constantly check yourself… KEEP YOUR CHIN TUCKED!!! One tip is to try and sit an inch taller, give yourself some sort of reminder such as a note at your work station or setting an electronic watch to chime every hour.

Should an accident occur where and team member sustains a lift related/ergonomic injury, their supervisor is to file an incident report immediately and have it into the office within 24 hours. Upon receipt of the incident report the safety director at either location is to investigate the incident. All injuries are to be reported and recorded in accordance with OSHA requirements, tracked in a spreadsheet by crew and maintained by the Operations Manager. Trend analysis is to be done throughout the year and the findings are to be shared with the crews as needed and at a minimum, annually.

Supervisors are to continually assess engineering control, workstation design and work practices of team members to determine if a change should be made. Supervisors are responsible for administering these types of changes. For example, they could suggest rotating team members on job duties, reducing the number of repetitions, using ergonomically friendly equipment, giving rest/stretch periods, etc.

The following program is to be evaluated by the Chief Safety Director annually to ensure that techniques and training outlined in this program are effective and pertinent to work activities.

Fall Protection

The purpose of the Fall Protection Program is to eliminate all danger associated with working around falling hazards. All team members are required to be aware of every falling hazard and to properly protect themselves prior to beginning work. The Operations Manager is responsible for ensuring fall protection is available to all team members who request it at no cost. Fall protection must meet all applicable OSHA, ANSI and ASTM requirements.

All team members are required to complete documented training on recognition and elimination of falling hazards prior to work assignment and on an annual basis. The Human Resource Manager is responsible for keeping detailed records of training including names of participants and training dates. The fall protection training program is to be evaluated by the Chief Safety Director yearly to ensure that it is as effective as possible and pertinent to the current work environment.

All fall hazards must be identified and eliminated for each job prior to the beginning of work. Fall protection is required whenever team members are exposed to falls from heights greater than 6 feet. Guard rails, safety nets, harnesses or other safety mechanisms must be used to eliminate the falling hazard. Supervisors and foremen must be trained and able to properly communicate fall hazards to all team members on site. All fall hazards should be reported on the job site inspection form and, per company policy, all near misses and falling incidents need to be reported. Prompt rescue of an employee shall be safely executed at all costs. Accident investigations are to be conducted to evaluate the fall protection program for potential updates to current practices or training to prevent reoccurrence.

Site specific plans are not utilized due to the extreme differences of job sites. The Opp Construction fall protection training program is tailored to industry specific hazards rather than work site.

Fatigue Management

The purpose of the Fatigue Managing program is to eliminate incidents due to fatigue at the jobsite. All team members are required to be familiar with this program and to report every case of fatigue to management. Training on fatigue hazards and countermeasures is to be completed prior to work assignment and on an annual basis. The Chief Safety Director is responsible for evaluating this policy yearly.

Because most of our work is outdoors, weather dictates when we are able to perform services. Many hours or work in a short time frame are necessary to complete projects on time and on budget. Therefore, it is imperative that all team members practice fatigue countermeasures while at work as well as in their own homes. Supervisors are responsible for managing work hours and controlling job rotation schedules to limit fatigue, allow for sufficient sleep, and increase mental fitness in an effort to minimize turnover and absenteeism. To control fatigue, work tasks must be analyzed and evaluated periodically.

Preventive Strategies:

Minimize sleep loss: Developing a sleep routine makes it easier to fall asleep. Relaxing prior to bed and creating a cool, comfortable, quiet sleeping environment will induce a deep, refreshing sleep. Team members should try to get 6-9 hours a night.

Diet: Eating too much or too little of certain foods can interfere with the ability to fall and stay asleep. Caffeine, alcohol and nicotine interfere with sleep and should be avoided prior to bed. Chronic use of over the counter drugs, prescription drugs and any other product that increases fatigue are discouraged.

Drink water: Staying hydrated helps fight fatigue. Team members should try to get 6-10 8oz. glasses a day.

Exercise: Getting regular exercise of about 30 minutes a day helps to maintain health and fight the effects of fatigue. Exercising before the start of a shift, if not overdone, can invigorate the body and mind and provide a healthy way to wake up for work. Team members should stretch each day before work and throughout the day as needed.

Ergonomic Activities: Team members are encouraged to rotate job duties to prevent fatigue and to use ergonomically friendly equipment when available. PPE that makes job duties easier should be worn when doing repetitive and strenuous tasks.

Break times: Supervisors are responsible for scheduling breaks for crews. When working in extreme heat or other severe weather conditions, supervisors are required to schedule breaks more frequently.

Incident Reporting: If a team member is feeling the effects of extreme fatigue from over exertion or working in extreme weather, team members should report to their supervisor immediately. Their supervisor should evaluate the situation and relieve them from duty either temporarily or suspend their work activities for a determined period of time if necessary. Inversely, if a supervisor sees someone experiencing extreme fatigue they are to address the situation immediately and remove them from the work environment to provide them sufficient rest and hydration as necessary.

First Aid

Opp Construction's First Aid program is put in place to ensure proper medical treatment for team members who are injured on the jobsite. This program applies to all Opp Construction team members. Training in the First Aid Program is to be done before initial job assignment and on an annual basis. The Chief Safety Director is responsible for review of this program and ensuring its effectiveness within our organization.

In the absence of an immediately available medical facility for the treatment of injured team members, a person who has a valid certificate in first aid training, verified by his training card, will be available at the worksite to render first aid. Qualified individuals who are trained and

certified in first aid shall receive their training every two years from a certified trainer through the North Dakota Safety Council.

The Operations Manager is responsible for ensuring each crew and job site has appropriate first aid materials available at no cost to team members. First Aid Kits are to be in every foreman & supervisor truck as well as in any trailers and accessible at all times. All materials are to be stored in weatherproof containers and each material is to be individually sealed. The Safety Director at each branch location is responsible for the stocking and maintenance of the first aid kits. Foremen are to assess the quantity of materials available to them at each job site and restock them with assistance of their safety director if the kits are deficient. Safety directors at each branch location are to do quarterly assessments.

Each Safety Director is responsible for making first aid kits available in every company building. Work areas where team members could be exposed to corrosive materials, such as the shops and garages, are equipped with eye wash stations for a quick drenching or flushing of the eyes should such a need arise.

In case of an injury during working hours, all crews are equipped with vehicles to transport the injured to the nearest medical facility for medical attention. If the injured person cannot be moved safely, a person at the scene is to call 911. In the instance that the crew is working out of town and 911 is not the first responder each crew is furnished with a Job Site Inspection and Hazard Prevention Report that lists the number for the first responder.

Forklift & Industrial Trucks

Training and Certificates

The Forklift & Industrial Trucks Program is put in place to ensure that all team members have the proper training and documentation necessary to safely operate Power Industrial Trucks (forklifts).

Before operating a forklift all operators must first be certified by a certified trainer and an evaluation form must be filled out. At least once every 3 years forklift operators must be re-evaluated for their performance. Operators must inspect the equipment daily and reporte all defects immediately to the shop superintendent.

A forklift is any mobile power-propelled truck used to carry, push, pull, lift, stack or tier materials. Forklifts can be ridden or controlled by a walking operator. Earth moving and over the road haulage trucks even if modified to accept forks are not forklifts. At Opp Construction **ALL** forklifts & Manitou's are considered powered industrial trucks (forklift).

All operator training and evaluation shall be conducted by persons who are certified to have the knowledge, training, and experience to train powered industrial truck operators and evaluate their competence. Certification for forklift training can be obtained from the North Dakota Safety Council.

The forklift trainer must focus on the general principles of safe truck operation, the type of vehicle(s) being used in the workplace, the hazards in the workplace created by the use of the vehicle(s), and the general safety requirements of forklift operation. The trainer must evaluate trained operators in the workplace to see if they can do the job properly and safely. Both formal (lecture, video, etc.) AND practical (demonstration and practical exercises) training must be provided by the certified forklift trainer.

Refresher training must be provided when the operator has been observed to operate the forklift in an unsafe manor, the operator has been involved in an accident or near-miss, the operator evaluation reveals the operator is not operating safely, the operator is assigned to a different type of forklift, or the condition of the workplace changes in a manner that could affect safe operation of the forklift.

Evaluation of an operator's performance is to be accomplished by observing the team member operating the forklift and discussing about safe operating procedures with the team member so that they understand how to operate safely.

The certified trainer is required to train team members in all operating instructions, warnings, and precautions listed in the operator's manual for the type of vehicle which the team member is being trained to operate, including the proper use of seatbelts, load capacity/stability, refueling, controls, & visibility.

Truck Operations

Seatbelts must be worn at all times

Trucks shall not be driven up to anyone standing in front of a bench or other fixed object

No person is allowed to stand or pass under the elevated portion of any truck, whether loaded or empty.

No riders allowed under any circumstance

Arms and legs are prohibited from being placed between the uprights of the mast or outside the running lines of the truck.

When a truck is left unattended (25 ft. or more away from vehicle if in view or whenever out of view), load engaging means shall be fully lowered, controls shall be neutralized, power shall be shut off, and breaks set. Wheels shall be blocked if the truck is parked on an incline.

When the operator of an industrial truck is dismounted and within 25 ft. of the truck still in his view, the load engaging means shall be fully lowered, controls neutralized, and the brakes set to prevent movement.

A safe distance shall be maintained from the edge of ramps or platforms while on any elevated dock, or platform or freight car. Trucks shall not be used for opening or closing freight doors.

Breaks shall be set and wheel blocks shall be in place to prevent movement of trucks, trailers, or railroad cars while loading or unloading. Fixed jacks may be necessary to support a semitrailer during loading or unloading when the trailer is not coupled to a tractor. The flooring of trucks, trailers, and railroad cars shall be checked for breaks and weak areas before driving on them.

There shall be sufficient headroom under overhead installations, lights, pipes, sprinkler system, etc.

An overhead guard shall be used as protection against falling objects. It should be noted that an overhead guard is intended to offer protection from the impact of small packages, boxes, bagged material, etc., but not to withstand the impact of a falling capacity load.

A load backrest extension shall be used whenever necessary to minimize the possibility of the load or part of it from falling rearward.

Only approved industrial trucks shall be used in hazardous locations.

Fire aisles, access to stairways and fire equipment shall be kept clear.

All traffic regulations shall be observed, including authorized plant speed limits. A safe distance shall be maintained approximately three truck lengths from the truck ahead, and the truck shall be kept under control at all times.

The right of way shall be yielded to ambulances, fire trucks, or other vehicles in emergency situations.

Other trucks traveling in the same direction at intersections, blind spots, or other dangerous locations shall not be passed.

The driver shall be required to slow down and sound the horn at cross aisles and other locations where vision is obstructed. If the load being carried obstructs forward view, the driver shall be required to travel with the load trailing.

Railroad tracks shall be crossed diagonally wherever possible. Parking closer than 8 feet from the center of railroad tracks is prohibited.

The driver shall be required to look in the direction of, and keep a clear view of the path of travel.

Grades shall be ascended and descended slowly.

When ascending or descending grades in excess of 10 percent, loaded trucks shall be driven with the load upgrade.

On all grades the load and load engaging means shall be tilted back if applicable, and raised only as far as necessary to clear the road surface.

Under all travel conditions, the truck shall be operated at a speed that will permit it to be brought to a stop in a safe manner.

Stunt driving and horseplay shall not be permitted.

The driver shall be required to slow down for wet and slippery floors.

Dockboard or bridgeplates, shall be properly secured before they are driven over. Dockboard or bridgeplates shall be navigated carefully and slowly never exceeding their rated capacity.

Elevators shall be approached slowly, and then entered squarely after the elevator car is properly leveled. Once on the elevator, the controls shall be neutralized, power shut off, and the brakes set.

Motorized hand trucks must enter elevator or other confined areas with load end forward.

Running over loose objects on the roadway surface shall be avoided.

Negotiating turns by turning the hand steering wheel in a smooth, sweeping motion with speed reduced to a safe level. Except when maneuvering at a very low speed, the hand steering wheel shall be turned at a moderate, even rate.

Only stable or safely arranged loads shall be handled. Caution shall be exercised when handling off-center loads which cannot be centered.

Only loads within the rated capacity of the truck shall be handled.

The long or high (including multiple-tiered) loads which may affect capacity shall be adjusted.

Trucks equipped with attachments shall be operated as partially loaded trucks when not handling a load.

A load engaging means shall be placed under the load as far as possible; the mast shall be carefully tilted backward to stabilize the load.

Extreme care shall be used when tilting the load forward or backward, particularly when high tiering. Tilting forward with load engaging means elevated shall be prohibited except to pick up a load. An elevated load shall not be tilted forward except when the load is in a deposit position over a rack or stack. When stacking or tiering, only enough backward tilt to stabilize the load shall be used.

If at any time a powered industrial truck is found to be in need of repair, defective, or in any way unsafe, the truck shall be taken out of service until it has been restored to safe operating condition.

Fuel tanks shall not be filled while the engine is running. Spillage shall be avoided.

Spillage of oil or fuel shall be carefully washed away or completely evaporated and the fuel tank cap replaced before restarting engine.

No truck shall be operated with a leak in the fuel system until the leak has been corrected.

Open flames shall not be used for checking electrolyte level in storage batteries or gasoline level in fuel tanks.

Any power-operated industrial truck not in safe operating condition shall be removed from service. All repairs shall be made by authorized personnel.

Hand & Power Tools

Hand and power tool safety is necessary for the prevention of disabling injuries. All hand tools and power tools either provided by Opp Construction or by the individual team members themselves must be maintained in a safe condition. All hand and power tools are to be inspected for damage, hazards and, if applicable, check fluids prior to each use. If, upon inspection, the hand or power tools do not appear to be in a safe, operable condition, the tool must immediately be removed from service, tagged, and brought to the shop for repairs or replacement.

Basic principles for hand tool safety:

-Each tool is designed for a certain job. Use tools for their intended purpose.

-Keep tools in good condition: sharp, clean, oiled, dressed and not abused.

-Worn tools are dangerous. For example the teeth in a pipe wrench can slip if worn smooth, an adjustable wrench will slip if its jaws are sprung and hammer heads can fly off loose handles.

-Tools subject to impact (chisels, star drill, punches, etc.) tend to "mushroom". Keep them dressed (sharpened) to avoid flying spalls. Use tool holders.

-Do not force tools beyond their capacity or use "cheaters" to increase their capacity.

-Chisels, screwdrivers or other pointed tools should never be carried in clothing pockets. Use tool belts designed for carrying tools.

-Hammers should have heads ground properly. They should not have broken claws or handles. Check for loose handles. Always use proper size and weight for the job.

-Cutting tools should be kept sharp to ensure good smooth cutting. Always use proper handles. Stay out of the line of fire.

-Drill Bits should be kept sharp, not dull, chipped, rounded, or tapered.

-Screwdriver points should not be badly worn and handles should be in good condition. Use the proper size and type of screwdriver for the job.

-Wrenches, if adjustable, must work freely and adjust properly. Gripping teeth or smooth jaws should not be worn. Always use the proper size for the job.

Basic Principles for power tool safety:

-Never carry a tool by the cord or hose.

-Never yank the cord or the hose to disconnect it from the receptacle.

-Keep cords and hoses away from heat, oil, and sharp edges. Disconnect tools when not using them, before servicing and cleaning them, and when changing accessories such as blades, bits, and cutters.

-Keep all people not involved with the work at a safe distance from the work area.

-Secure work with clamps or a vise, freeing both hands to operate the tool.

-Avoid accidental starting. Do not hold fingers on the switch button while carrying a plugged-in tool. Always keep machines in neutral and throttle in 'low speed' positions when starting.

-Maintain tools with care; keep them sharp and clean for best performance.

-Be sure to keep good footing and maintain good balance when operating power tools. If operating on an incline stand on the uphill side of the machine. Move up and down the incline rather than across it to avoid tipping.

-When operating a vibrator tamper, never run it over unyielding surfaces such as concrete or bricks. This will damage the machine and void the warranty.

-Always use safety guards installed on hand and power tools. Never bypass this step.

Guarding:

Where required, all power tools that are in need of equipment guarding shall be so equipped with guards and those guards shall be utilized during all phases of operation. Machines shall be guarded to ANSI standards so that all exposed moving parts are guarded to prevent exposing hazards to team members. Machine guards are not to be manipulated or removed in any way. If the tool's guarding devices are not in place, found defective or not operating correctly, the tool should be removed from service immediately, tagged and sent to the shop for repairs, or replacement.

Personal Protective Equipment:

Team members using hand and power tools who are exposed to the hazards of falling, noise, flying, abrasive, and splashing objects, or exposed to harmful dusts, fumes, mists, vapors, or

gases shall be provided with the particular personal protective equipment necessary to protect them from the hazard. All personal protective equipment shall meet the applicable OSHA and ANSI standards.

Types of Personal Protective Equipment to use:

Respiratory Protection: is any safeguard against harmful airborne particles not immediately dangerous to life and health. Carbon and paper-based filters are used in a variety of different respirators to purify the air and ensure you are only breathing in clean, non-toxic air. This type of PPE should always be used when you could potentially be exposed to dust, mist and fumes, and should always be a prime consideration when operating power tools.

Auditory Protection: is recommended for all instances where power tools or machinery are in use. The louder the equipment or power tool, the more important the protection. Beside the class number, all hearing protection will have a decibel rating. This is the specific level of noise from which the user can be protected.

Visual Protection: should always be used when operating any power tool, as there are many flying particles which are capable of entering and damaging your eye. There are three main types of PPE for your eyes; safety glasses, safety goggles, and face shields.

Physical Protection: prevents physical harm from hand or power tools, construction materials, concrete and chemicals. It is generally in the form of boots, gloves and hard hats.

Hazard Communication

The Hazard Communication Program is put in place to ensure all team members are aware of the hazards on the job and are properly trained at safeguarding these hazards. Team members must be informed of the hazards of the job prior to initial job assignment and whenever a new physical or health hazard is introduced into their work area. Written Hazard Communication such as container labeling, Safety Data Sheets (SDSs), warning signs and additional periodic training will be maintained at each workplace to ensure additional hazard communication.

Written Hazard Communication

Each container of hazardous chemicals on a jobsite must be properly labeled. The labels will list:

1. The contents of the container.
2. Appropriate hazard warnings.
3. The name and address of the manufacturer, importer or other responsible party.

To further ensure that team members are aware of the chemical hazards of materials used in their work areas all secondary containers must be labeled. Secondary containers will be labeled with either an extra copy of the manufacturer's label, or with a sign or generic label that lists

the container's contents and appropriate hazard warnings. This is the responsibility of the Foreman and user at each location.

A list of all hazardous chemicals that will be used on the worksite will be maintained by the Chief Safety Director. SDS books for all hazardous chemicals to which team members may be exposed to are to be kept in all offices, shops and foreman pickups. The chief safety director is responsible for the update of these books and the office manager, shop foreman, & foreman are responsible for getting the updated copy as needed and being familiar with the hazardous chemicals that they use on their jobsite.

Hazard Communication Training

Team members are to be trained on hazardous chemicals in their work area prior to job assignment and at least annually. The chief safety director will have the responsibility of coordinating the hazard communication program for Opp Construction. The chief safety director is responsible for making sure the trainer covers the following:

1. An overview of the hazard communication requirements.
2. A review of the chemicals present in their workplace operations.
3. The location and availability of written hazard communication program, the list of hazardous chemicals, & SDS book.
4. Methods and observation techniques that may be used to detect the presence or release of hazardous chemicals in the work area.
5. The physical hazards of the chemicals in the work area.
6. The health hazards of the chemicals in the work area, including signs and symptoms of exposure and any medical condition known to be aggravated by exposure to the chemical.
7. How to lessen or prevent exposure to hazardous workplace chemicals by using good work practices, personal protective equipment, etc.
8. Emergency procedures to follow if team members are exposed to hazardous chemicals.
9. An explanation of our hazard communication program, including how to read labels and SDS to obtain appropriate hazard information.

Information for hazards of non-routine tasks will be communicated by having a safety meeting on the hazards of the non-routine tasks prior to performing the task. Non-routine tasks are to be identified by the Supervisor of each crew.

To ensure that the team members of other contractors have access to information on the hazardous chemicals at a jobsite, it is the responsibility of the bidder/estimator to provide the other contractors the following information:

1. Where the SDSs are available.

2. The name and location of the hazardous chemicals to which their team members may be exposed and any appropriate protective measures required to minimize their exposure; and an explanation of the labeling system used at the jobsite.

Each contractor bringing chemicals onto a jobsite must provide Opp Construction with the appropriate hazard information on those substances to which our own team members may be exposed on a jobsite.

Hazard Identification and Risk Assessment

Opp Construction's Hazard Identification and Risk Assessment Program is put in place to ensure that all hazards are properly identified and the associated risks are eliminated. Job Site Inspection/Hazard Prevention Report (JSI) is a tool to be used to identify hazards and eliminate incidents in the workplace. All team members are responsible for identifying hazards and reporting them immediately to their direct supervisor.

All Supervisors must complete a JSI before the start of every job. JSI must be completed before all routine and non routine jobs as well as any before any changes in operation that occur after the job has begun. Supervisors are responsible for ensuring that all hazards are identified, assessed, prioritized based on the risk associated with the task, communicated to all team members and documented on the JSI form. A safety meeting prior to the start of every job must be held to identify any additional safety hazards that may have been overlooked and to communicate to all team members and subcontractors the identified hazards on the JSI.

All Buildings & Shops must have documented monthly & annual inspections completed. Change Analysis must be performed when any equipment, materials & processes have changed to be evaluated for safety & health.

Quarterly the Operations Manager is responsible for ensuring a group of upper management conducts quarterly inspections for random site audits to include the entire workplace. This should review all operations in its entirety. These inspections are to be documented and include the corrective actions taken and the names of the individuals conducting the inspections. The Operations Manager should inspect and review all corrective actions. All corrective actions should be done so in a timely manner. The individual who made the correction and the date the correction happened on will be documented on the Inspection Form to ensure timely completion.

The Operation Manager is responsible for ensuring that the "Job site Inspection/Hazard Prevention Report" is generated for each and every job with the job name and number listed. See below for an example of the Operation Manager's responsibility in yellow. Also listed will be the date, a phone number for the 1st responder if working out of city limits and the locate ticket number and work begin time and date. A copy of the locate information will also be attached to the report.

JOB SITE INSPECTION/HAZARD PREVENTION REPORT

Job Name: _____ Date: _____

Person Starting Inspection: _____

Person Continuing Inspection: _____

If out of city limits--Phone number for energency 1st Responder: _____

Locates completed on this date: _____ Time: _____ Ticket Number: _____

A potential hazard is defined as a condition or practice with the potential for accidental loss. Team members must be trained prior to work assignment and on at least an annual basis on the hazard identification process including the use and care of proper Personal Protective Equipment. The Safety Directors and any assigned key employees will audit the use of this report and proper PPE during their document site audits and also for accident investigation purposes.

The "Job Site Inspection/Hazard Prevention Report" will be turned into the Safety Directors basket upon completion of job or when a locate refresher has been called in (whichever one comes 1st). All Safety Directors not at the corporate office are to send the "Job Site Inspection/Hazard Prevention Report" for their location to the Chief Safety Director weekly.

The Chief Safety Director is to keep the Job Site Inspection/Hazard Prevention Reports on file for a period of 5 years unless OSHA or WSI regulations require longer. These are to be available to upper management as needed with request to the Chief Safety Director. The information that is gathered on these forms should be used to generate statistics on safety and work performance and be used to further train and educate our team members.

The Chief Safety Director will review this procedure each year to evaluate the effectiveness of the program.

Incident Investigation & Reporting

Incident Reports & Investigations are used for the prevention and reduction of injuries & quality control in the workplace. Incidents are prevented and quality is improved by determining a root cause and improving systems and work methods or by eliminating potential hazards for team members, the company and the public. All team members are required to be familiar with incident investigation and reporting.

Incident Reporting:

Every team member is responsible for verbally reporting each incident immediately to their supervisor or manager. The direct supervisor is responsible for filling out a written incident investigation report within 24 hours of the incident. All deaths and/or incident causing the hospitalization of 3 or more team members must be orally reported by the Chief Safety Director to OSHA within 8 hours of discovery and as soon as possible within 24 hours to the owner client.

The Incident of Injury, Near Miss, Quality Control, Property Damage, Vandalism/Theft report, is used to report any injury, near miss, rework pertaining to quality issues, damage to company or other personal property and vandalism and theft on the jobsite. All areas in the incident report that are not grayed out should be filled out completely within 24 hours.

Supervisors are to be as specific as possible when filling out the form. For example in the Location Field put the Job Name and Number as provided by your estimator. An accurate description of the events that happened immediately before and after the incident as well an accurate description of the events and details of the actual incident is critical to the purpose of the form. Lack of information in these fields will result in a minimum of an oral warning to the supervisor involved in filling out the form.

After the form is filled out and signed by the supervisor and the team member(s) involved please turn in the form within 24 hours to the office nearest your location in the Safety Directors basket. The Chief Safety Director is to turn the form into the HR Manager for data analysis and record keeping. The HR Manager is to sign the form acknowledging receipt and indicating whether the proper procedures were followed and if not which actions were taken or should be taken.

In the event of an injury resulting in the loss of an eye, an injury resulting in an amputation of any body part or part of body part or requiring inpatient hospitalization OSHA must be notified within 24 hours.

In the event of a natural death or an injury resulting in death on any of Opp Constructions job sites or place of business an immediate call to 911 or the 1st responder will be made. The supervisor will immediately secure the area and ensure that **no statements to anyone** are made. If questioned by anyone the supervisor and all team members will simply answer **"No Comment"** and will politely refer any question to Greg Opp. Next Greg Opp will be notified, if Greg is unavailable notify Gary Opp, Dave Opp or Sally Miskavige. In the rare instance no contact can be made next notify someone on the safety committee Greg Schroeder or Shaylee Brien. Greg Opp will be responsible for notifying and informing any family and giving any statements to the public.

The Safety Director will immediately arrive and take over the command of the site and start an accident investigation (refer to the incident investigation procedure). The Safety Director will make **no statements to anyone** and will refer any and **all** comments to Greg Opp. If questioned by anyone the Safety Director will answer **"This incident is under investigating and I have no comment at this time"** and will politely refer any questions to Greg Opp. OSHA is to be informed by the HR Manager within 8 hours.

If there are any questions regarding this procedure please refer them to the Chief Safety Director. The Chief Safety Director will review this procedure annually.

Incident Investigation:

The purpose of the incident investigation is to gather facts regarding the incident. Incident Investigations are the responsibility of the Safety Director at each location. All incidents must be investigated and the extent of the investigation is to reflect the seriousness of the incident. The knowledge gained from investigations is crucial in eliminating future accidents by determining and eliminating the root cause of the incident.

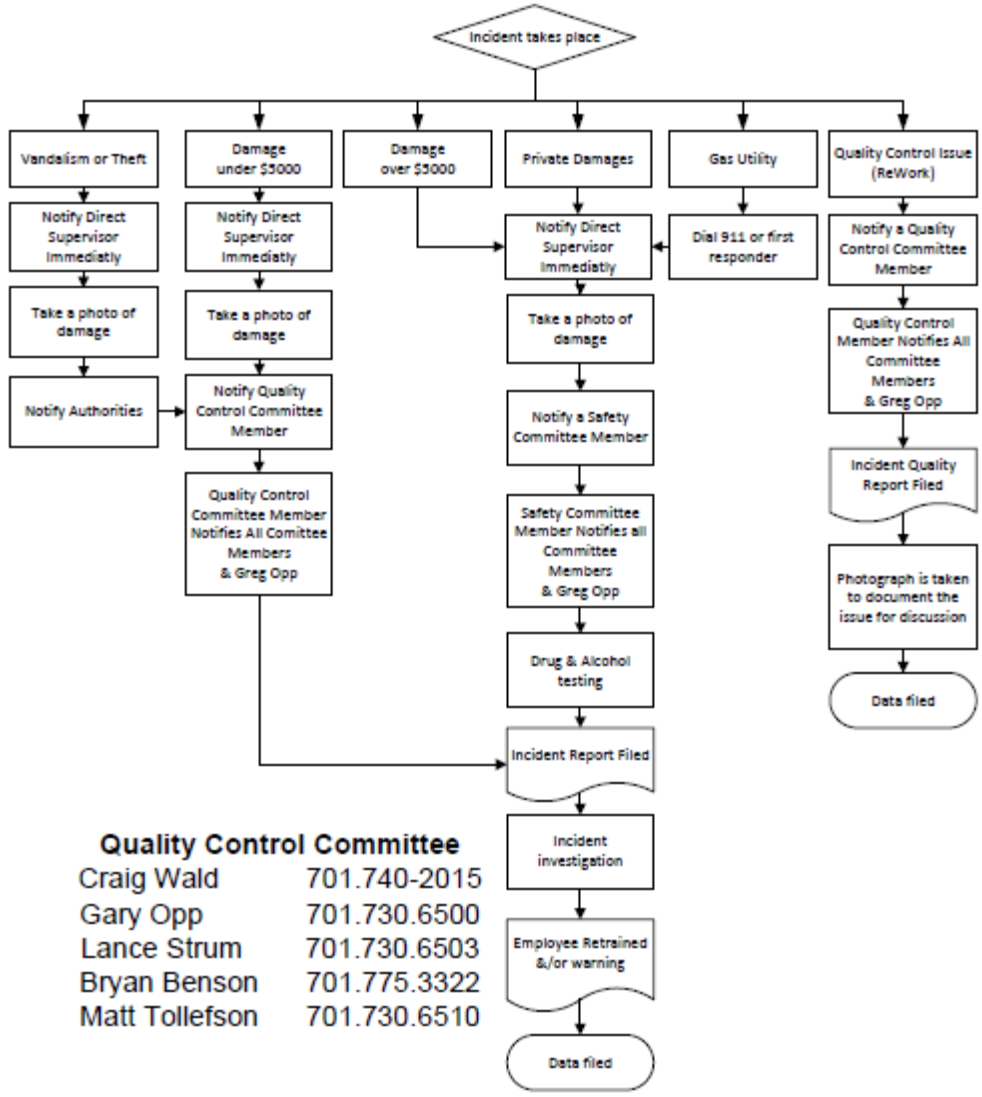
Root Cause Analysis is to be completed for each incident with the assistance of the team member involved, the direct supervisor of the team member involved, and the Safety Director. All of the facts on the incident report should be reviewed to determine the root cause. The root cause determined is to be used to assist in re-training the team member(s). The Safety Director will review the facts and determine a conclusion after the root cause has been determined and re-training completed.

Initial identification of facts during an investigation should include but not be limited to items such as weather, lighting, noise, temperature, ventilation, fatigue, age, physical condition, and medical condition. Any physical evidence that must be secured can be done so by photographs, notes, statements by witnesses and impounding equipment and or documents. Statements by witnesses should be collected when necessary. Making sure the witness is un-biased and taking detailed notes are the key to successful interviews. The need for follow-ups should be addressed. Proper equipment necessary to assist in an investigation will be provided such as pens, measuring equipment, cameras, PPE, etc.

In cases of an injury requiring medical attention or rework costing $5,000 or more, the crew must complete a Job Hazard Analysis of the root cause. The Safety Director will make sure the proper root cause is identified, that the proper re-training procedure is conducted, and that the team member warning (if needed) is documented and filed with HR. The Safety Director will then sign the form indicating all of the above were addressed.

This program is to be reviewed annually by the Chief Safety Director. Team members must receive training prior to work assignment and annually on their role in the incident investigation and reporting process. They should all be familiar with different incident investigation techniques and processes.

Incident of Non-Injury

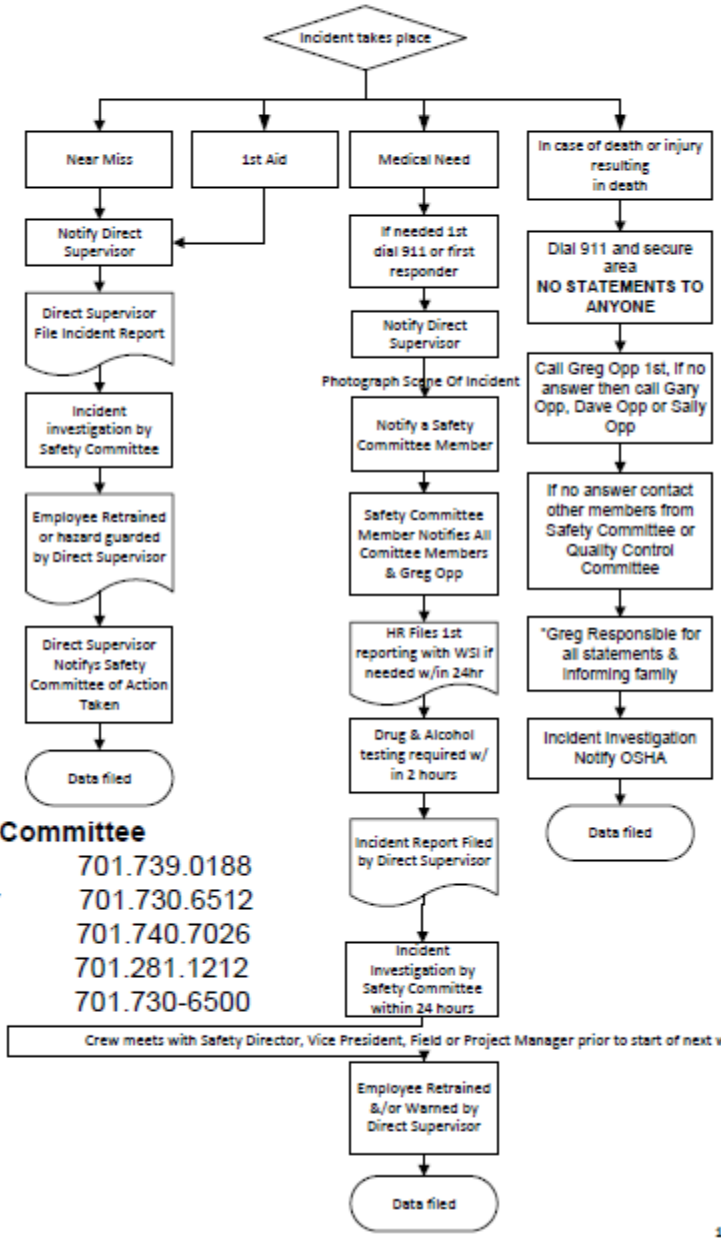


Quality Control Committee

Craig Wald	701.740-2015
Gary Opp	701.730.6500
Lance Strum	701.730.6503
Bryan Benson	701.775.3322
Matt Tollefson	701.730.6510

OPP CONSTRUCTION

Incident of Injury Flow Chart



Safety Committee

Dave Opp	701.739.0188
Greg Schroeder	701.730.6512
Sally Miskavige	701.740.7026
Shaylee Brien	701.281.1212
Gary Opp	701.730-6500

Job Competency

Opp Constructions Job Competency Program is put in place to ensure that team members are capable of safely and successfully completing the tasks required by their job duties. The Operations Manager is to ensure there is an up to date Organization Chart posted at both offices and available to all foreman and project managers. The Organization Chart lists the name and job titles of all active team members by crew and company division.

The Vice President is responsible for the structure of the company and ensuring that all team members are qualified and competent for the job title they hold. Supervisors, Managers and Foremen are responsible for being aware of where their team members stand in the Organization Chart and ensuring that no work is performed by any team member for which they are not trained, competent or qualified.

Job Descriptions are to be maintained by the Human Resource Manager. All team members are required to sign their job description acknowledging they are able to safely and successfully complete all of the tasks listed for their position. Their supervisor is to also sign their Job Description acknowledging they have trained and observed that the team member is competent in his/her new role and may be allowed to perform the tasks independently. Job Descriptions are obtained from employees to demonstrate they meet the qualifications of their job.

Safety Training Program

Management believes that employee involvement in this safety training program can only be successful when everyone on the site receives sufficient training to understand their safety responsibilities and opportunities and how to fulfill them. Therefore, ***training is a high priority to ensure a safe workplace.***

All new employees are to receive two hours of safety orientation prior to job assignment.

This training can be broken down into several components.

- General Safety Requirements
- Ergonomics Program
- Hazard Recognition Program
- Incident Investigation/Near Miss Program
- General Job Description and Job Requirements
- Safe Operating Procedures specific to each Division and Type of Equipment
- Emergency Action Plans
- Hazard Communication Program

- Motor Vehicle Operation
- Personal Protective Equipment
- Substance Abuse Policy and Program

All new Foreman are to receive four hours of safety orientation prior to job assignment.

This training can be broken down into several components.

- Reasonable Suspicion Training for Alcohol & Substance Abuse
- Continuously Improve for Safety Excellence
- Culture of Early Reporting
- Inspections & Observations
- Review Job Description and Job Requirements
- Behaviors of effective foreman
- Delegating, accountability, coaching & performance feedback

All new Supervisors are to receive four hours of safety orientation prior to job assignment.

This training can be broken down into several components.

- Continuously Improve for Safety Excellence
- Behaviors of effective supervisors
- Delegating, accountability, coaching & performance feedback
- How to address difficult employees
- Review Job Description and Job Requirements

This training further extends throughout employment to include weekly toolbox safety meetings, bi-annual trainings that take place at the end of season and before the season begins and behavior based safety that is continual throughout the season including the following:

On the Job Training: Coaches are on each crew and have been certified by Opp Construction to complete new hire and on the job training. They document all of the equipment training and complete any other necessary training required that is crew specific.

Toolbox Talks: Weekly safety topics that are industry specific. Foremen are responsible for administering the toolbox talks. Foremen are trained to encourage crew participation and relating toolbox talks to current job sites. All forms must be signed by all team members present.

Job Hazard Analysis: Weekly job task specific topics are analyzed by job steps and the hazards are identified and elimination ideas are discussed. Foremen are responsible for administering the Job Hazard Analysis and are trained to encourage participation. All forms must be signed by all team members.

Winter Kick Back: (end of season training): This is training time to prepare for winter months. It involves in depth snow removal training for those employees who push snow for Opp Construction. Also, if needed in the current year a CPR and First Aid training class is provided for those employees whose certification is about to expire. Also, we provide Defensive Driving Training for those individuals who were either unable to attend the defensive driving training offered at the Spring Kick Off or were hired after that date.

Spring Kick Off: This is a week-long training conference that aims to cover several different safety related topics. Every person who works for Opp Construction is required to attend. Each year there is division specific safety related training in addition to guest speakers who can speak on safety topics. A yearly defensive driving course is offered here. If there are updates on safety policies or procedures they are reviewed here. The safety director presents a "year in Review" and he reviews accidents, incidents, near misses, and other safety related information that was either poor and needs to be improved or was great and needs recognition. Other safety topics that often occur at the Spring Kick Off are equipment training, substance abuse training or Reasonable Suspicion Training for supervisors, Supervisor training, and Entry Level Driver Training.

The cooperation of every person in our company is necessary to ensure the high standards of job safety and quality work we must maintain. One of the conditions of employment is to understand and follow the work rules as outlined in the safety program. Our supervisors and managers are charged with the responsibility of introducing, explaining, and enforcing them.

The key to a successful program, as always, rests with each individual worker who makes the commitment to being safety and quality conscious every minute of every day.

Together our efforts can produce excellent results.

Ladder Safety

The ladder safety program has been put in place to reduce the risk of incident or injury to team members while working on our around ladders.

Ladder Load Limits/Size/Construction: Ladders shall be capable of supporting loads for which they were intended and not for anything beyond the manufacturer's rating.

All ladders shall have rungs, steps and cleats that are parallel, level and uniformly spaced when being positioned for use and shall be constructed to the proper dimensions per the applicable OSHA standard for the particular ladder type.

Ladder Selection: When choosing a ladder, remember:

-Portable ladders must be of proper construction, size and type for the work to be completed

-Metal ladders cannot be used around electrical equipment (use wood or fiberglass)

-Ladders must be of sufficient height to perform the necessary work. Standing on the top two steps of a step ladder or the top three steps of a straight ladder is prohibited.

-Step ladders cannot be used as straight ladders.

-When attempting to gain access to a platform, roof or other elevated area, a straight ladder shall be used.

-The straight ladder must extend at least 3 feet above the surface area to be accessed.

-If the ladder is to be used at a height of 8 feet or more, it shall be tied off, held in place by a spotter or otherwise prevented from movement.

Ladder Inspection: Ladders should be thoroughly and periodically inspected:

-Upon receipt of a new ladder, inspect the ladder to make sure it has no visible damage, loose or missing parts, and is free of recognized danger that could cause injury. Label the ladder as belonging to Opp Construction.

-Ladders are to be inspected upon each use and thoroughly every 6 months for damage and deficiencies.

-Any ladder found to be damaged beyond repair should be disposed of after complete dismantling or breakage to ensure ladder is not used again. If ladder can be repaired, it should be removed from service, tagged out, and brought to the shop for repairs.

General Ladder Safety:

-Use ladders for their intended purposes only. Never use ladders horizontally or as scaffolding.

-Always face the ladder when ascending or descending and use both hands to hold on.

-Tools should be carried in a tool belt.

-Never place a ladder in front of an obstacle that could cause the ladder to move. I.e. a door. If you must, make sure the door is locked and use appropriate signage to inform other team members that there is someone working on the ladder.

-Never place a ladder on anything to bring it higher like concrete blocks or buckets.

-Keep ladders free of oil, grease, and other slipping hazards. Use sand or other means to secure the ladder in place on snowy or other slippery conditions.

-Only one person at a time is allowed on a ladder.

-Do not load a ladder beyond the maximum intended load or carry loads that could cause a person to lose balance and fall.

-Ladders shall be placed against intended surface so that the horizontal distance from the top support to the foot of the ladder is one quarter of the working length of the ladder.

It is the responsibility of each supervisor to oversee the implementation and enforcement of this policy.

Lock-out/Tag-out

Energy control procedures protect team members during machine and equipment servicing & maintenance where unexpected energization, start up or release or stored energy could occur and cause injury, as well as while working on or near exposed de-energized electrical conductors and parts of electrical equipment. The lock-out/tag-out procedure ensures that machines and equipment are properly isolated from hazardous or potentially hazardous energy sources during servicing and maintenance by protecting against re-energization. Potential energy may include any source of electrical, mechanical, hydraulic, pneumatic, chemical, thermal, or other energy. This procedure is to be used to ensure the machine or equipment is stopped, isolated from all potentially hazardous energy sources and tagged out before team members perform any servicing or maintenance where the unexpected energization or start-up of the machine or equipment or release of stored energy could cause injury.

Only trained, authorized team members can perform lockout/tagout procedures. All affected team members who are entering an area where lockout/tagout is performed must be trained. The first step is to determine all energy isolating devices requiring lockout/tagout to ensure effective control of hazardous energy. Before shutdown of equipment or machine identify the type and magnitude of the energy that the machine or equipment utilizes, understand the hazards of the energy, and know the methods to control the energy. Shutdown the equipment or machine by normal procedures and locate the necessary energy isolating device(s) for the equipment or machine and operate them to isolate the energy sources and lockout the energy isolating the device. Lockout and tagout devices should include the name of the team member placing the device and the equipment should have an “Out of Service” sign taped over the ignition.

Multiple team members shall utilize a procedure which affords the team members a level of protection equal to that provided by a personal lockout or tagout device. An authorized team member must have primary responsibility for the set number of team members involved in the group lockout or tagout. The authorized team member is to designate and coordinate affected work forces and is to ensure continual protection to all team members. Each team member shall have a personal lockout or tagout device bearing their name to the group lockout device when they begin work and shall remove the device when they stop working on the machine being serviced. Shift or personnel change procedures shall be utilized during changes to ensure the continuity of lockout or tagout protection.

All potentially hazardous stored or residual energy shall be relieved, disconnected, restrained & otherwise rendered safe. If there is possibility of re-accumulation of stored energy, level verification of isolation shall be continued until the servicing or maintenance is completed, or

until the possibility of such accumulation no longer exists. Prior to starting work on machines or equipment that have been locked/tagged out, verify that isolation & de-energization of the machine or equipment have been accomplished. Then perform the servicing and maintenance.

Removal of the lockout tagout device and "Out of Service" sign can only be done by the person who placed it there and must be the last step to putting the unit back in service. Safely restore machine or equipment to normal production by replacing all guards and safety devices and removing tools and equipment. In no case is any team member allowed to go under any machine that is not locked out and blocked up. (Jacks are not blocks.) Any time a truck box or loader bucket is raised so that the mechanic can work beneath it, blocks must be positioned to support the weight of the elevated part in case the hydraulics fail.

Any team member who fails to follow this procedure will face disciplinary action in accordance with those listed in the company handbook. Lock-out/Tag-out procedure will be reviewed & taught annually by the Chief Safety Director & include documented training with date, equipment, team members & inspector to ensure proper procedures are being followed. Training will include recognition of hazardous energy source, type & magnitude of energy available, methods & means necessary for energy isolation & control. Each authorized team member shall receive adequate training. Re-training is required when there is a change in job assignment, in machines, a change in the energy control procedures, or a new hazard is introduced. All affected team members must be instructed in the proper use of energy control procedure.

Lone Worker

The Lone Worker Program is put in place to ensure that only qualified and authorized team member's work alone and that they check in to prevent severe injury or death as a result of being unaccounted for. No team member is authorized to perform work alone until their new hire status has been removed; this is 30 days from their start date. This is standard for even the simplest of tasks. The only exception would be that if the team member is qualified and authorized to drive company vehicles they could operate the vehicle to drive to and from job sites alone.

If a team member has met the 30 day requirement, they may work alone but they must be aware of the dangers of doing so. These dangers and hazards differ from job site to job site and include but are not limited to accidents associated with fatigue, issues with personal disease or sickness, unexpected third party actions, extreme weather conditions, and more.

If a qualified team member is working alone he is to check in at least once every two hours with his supervisor, who must be at foreman level or higher in our organizational structure. If required to work alone in extreme weather or working conditions they should check in with supervisors in half or one hour increments, whichever is determined appropriate by their supervisor.

Mobile Equipment

Opp Construction's Mobile Equipment Program is put in place to ensure that only qualified and authorized team members operate equipment. The Mobile Equipment Program applies to all team members at Opp Construction. Supervisors, Managers and Foreman are responsible for enforcing the Mobile Equipment Program and ensuring only qualified & authorized operators are operating equipment.

Only qualified and authorized operators are allowed to operate Opp Construction equipment. To be qualified, operators must be familiar with the operation of the equipment as well as all of the guidelines in this program. To be authorized, operators must be trained by a team trainer on the specific equipment to be operated, have approval from the shop superintendent and foreman on site and have all of the paperwork and company training complete and on file with the Human Resource Manager.

Team Trainers must ensure the following:

The team member shall read through the operator's manual and understand its material.

The team member must be familiar with all safety regulations applicable to the equipment in use.

The team member must first operate the equipment under the DIRECT observation from the team trainer.

Once the trainer is convinced the trainee is familiar with the equipment safety controls and believes the team member can safely operate the equipment on site and around hazards he or she can then authorize the team member to work freely in the equipment at jobsites by filling out the training authorization form to be signed by trainer and trainee.

All coaches are responsible for observing the behavior of operators to ensure safe operation. Any team trainer observing unsafe behavior must immediately stop operation and complete written documentation of the performance issue and re-train the team member following the guidelines stated here. Unsafe operations can warrant disciplinary action up to and including termination.

Once a team member is trained to be an operator on a crew, he or she must follow general guidelines for operating company equipment to maintain and operate the equipment the safest way possible. Authorization to operate company equipment can be revoked at any time.

All equipment should be inspected by the operator prior to each use. This includes checking all fluids, brakes, back up alarm systems, steering, lighting, and control system. The operator should also ensure that the back-up alarm is operating while the equipment is backing up. If a piece of equipment is found defective in any way it should immediately be removed from service, the shop superintendent should be informed and the equipment should be locked out/tagged out for repair. Prior to and after operation the equipment should be given ample

time to warm up and cool down to prevent equipment damage. All equipment should be maintained in a safe and clean manner.

Operators are to wear their seatbelt at all times prior to starting the engine and during operation when so equipped. All mobile equipment with a roll bar is required to have seatbelts that are worn at all times.

Operators are only to use the equipment in the manner in which it was designed and should chose equipment based on what is appropriate for the task at hand. Operators should not load the equipment beyond its established load limit should ensure that they are secured for safe transport and unloading. Passengers on equipment are strictly prohibited unless the equipment or vehicle is equipped to handle passengers and in that instance passengers must wear their seat belt. Eye protection should be worn when operating without the protection of a closed cab.

When operating mobile equipment near stationary objects a 5' distance should be maintained. If this is impractical special attention needs to be taken to prevent any potential damage to anything. A barrier can be installed (such as an orange fence or delineator) to help layout path in tight areas. All stationary objects should be discussed and documented on the job site inspection form prior to starting work.

When fueling, operator shall shut off the engine before filling the fuel tank and shall ensure that the nozzle of the filling hose is inside with the filling neck of the tank. No one shall be on the vehicle during fueling operations except as specifically required by design. There shall be no smoking or open flames in the immediate area during fueling operation.

Noise Exposure / Hearing Conservation

The Noise Exposure/Hearing Conservation Program is put in place to ensure that the appropriate hearing protection is used properly when needed. All team members are subject to this program and are required to be trained prior to work assignment and on at least an annual basis. The Chief Safety Director is responsible for ensuring the enforcement of this program and the contents of training.

Annual training should consist of changes in PPE and work processes as well as the appropriate technique for ensuring proper use of the hearing protection. All Opp Construction team members are to have hearing protection available to them at no cost.

Hearing Conservation Program

Once team member exposure is presumed to equal or exceed an 8-hour time weighted average of 85 decibels or greater, all team members must follow the Hearing Conservation Program. When this is presumed (the action level is reached), Opp Construction's safety director will enforce the monitoring of noise levels using a sound level meter to identify the team members'

to be included in the hearing conservation program. Monitoring will be repeated whenever a change in production, process, equipment or controls increases noise exposures to a level at or above the action level, the current PPE is rendered inadequate, or team members reach their exposure time limit.

Opp Construction will provide, at no cost, an audiometric testing program to team members whose exposures equal or exceed an 8 hour time weighted average of 85 decibels. Within six months of the team members being exposed to the action level a baseline audiogram must be performed against which subsequent audiograms can be compared. Before the baseline audiogram can be established the team member should be exposed to 14 hours of no workplace noise. Opp Construction will inform the team members of the need to avoid high levels of non-occupational noise exposure during the 14 hours preceding the audiogram. After establishing the baseline audiogram Opp Construction will obtain annual audiograms for designated team members.

After each annual audiogram, technicians will evaluate results. If there is a threshold shift, the following will happen:

-A retest will be set within 30 days.
-The technician will review whether there is need for further evaluation.
-If a threshold shift results, the team member will be informed in writing within 21 days of evaluation.
-If the team member is not using hearing protection, he or she shall be fitted, trained and required to use hearing protection.
-If the team member is using hearing protection, he or she shall be refitted and retrained in the use of the PPE and provided hearing protectors offering greater protection if necessary.
-If deemed necessary by the technician, the team member can be referred for a clinical ontological exam.

Audiometric Test Requirements

Audiometric tests shall be pure tone, air, conduction and hearing threshold examinations, with test frequencies including at minimum 500, 1000, 2000, 3000, 4000, and 6000 Hz. Tests are done for each ear at each frequency.

Tests shall be completed with audiometers that meet the specifications of the American National Standard Specification for Audiometers.

Audiometer calibration shall be checked acoustically at least annually. Exhaustive calibrations will be performed at least every 2 years.

Hearing Protection

Opp Construction will make hearing protection available to all team members who are exposed to an 8 hour time weighted average of 85 decibels or greater at no cost to the team members. Hearing protection will be replaced as needed.

Opp Construction will provide a variety of hearing protection and train team members in the correct use and care of hearing protection as well as proper fitting.

Team members will be trained that they must wear hearing protection if they are required to wear that PPE for the job they are doing, or if they are exposed to an 8 hour time weighted average of 85 decibels or greater and have not had a baseline audiogram or have experienced a threshold shift.

The need for hearing protection will be evaluated for the specific work environment in order to attenuate team member exposure to at least an 8-hour time-weighted average of 90 decibels or lower, or for those team members who have experienced a threshold shift, 85 decibels or lower.

Training Program

All team members will be trained annually on threshold limits of noise exposure, PPE, the effects of noise on hearing, the purpose of audiometric testing, and all team members will have access to training information and materials.

Record Keeping

Exposure measurements will be recorded and kept on file. All audiometric tests shall be retained in the team member's medical files and will include name, job classification, date of audiogram, examiner's name, date of last acoustic or exhaustive calibration of audiometer, and team members most recent noise exposure assessment. These records shall be kept for the duration of team members' employment plus two years thereafter at minimum. All records shall be provided upon request to team members, former team members, and designated representatives of the team member.

Personal Protective Equipment / Assessment

Personal Protective Equipment (PPE) and clothing are essential to protect the safety and health of all workers on jobsites. The types of PPE and clothing will depend on the nature of the operations being performed. Team members are responsible for wearing appropriate PPE in operations where they are exposed to hazardous conditions or where hazards need to be reduced.

All team members will be required to wear some type of PPE at some time during their work day. It is imperative that they are trained on which to use and when. All team members are trained in basic PPE (Eye, Hand, Head, Feet, ear, Respiratory, visibility, etc.) upon hire and annually thereafter.

Should the work sites, equipment used, or PPE regulations change significantly and/or make the type of PPE used obsolete, the training will be updated to reflect the changes. All original training and ongoing training is documented and kept on file with the Human Resource Manager.

All PPE is to be provided to team members at a reasonable rate. It is kept in both office locations and is stored in a safe and sanitary manner. PPE is available in all standard sizes. Should Opp Construction not have the appropriate size for a team member, it will be special ordered immediately. Team members are required to wear properly fitting PPE. Once a team member has PPE and it becomes unusable or unsafe to use due to excessive use or damage, he must bring it into the office for replacement. Team members are not to use damaged PPE.

Replacement PPE is available at no cost to the team member. Team members are not to abuse PPE. Team members may use their own PPE only if it meets OSHA, ANSI and all other regulation agencies' requirements. Supervisors are to determine if the supplied PPE is adequate and meets these stipulations.

Opp Construction will inspect the work environment four times yearly. Through these job site inspections it is determined which tasks require what types of PPE. The team members are trained on these upon hire and annually each year. If a new work activity arises and a new type of PPE is required to complete this task, the team members affected are trained immediately. All of the assessments are signed by the Safety Director, the Operations manager and the Human Resource Manager. New work activity that requires new PPE is introduced in the form of a Toolbox Training and all the members of the affected crew sign the training. These items are filed in the Human Resource Manager's office.

Pneumatic Tools

Pneumatic tools are powered by compressed air. Common types of these air-powered hand tools that are used in industry include buffers, nailing and stapling guns, grinders, drills, jack hammers, chipping hammers, riveting guns, sanders and wrenches.

Using pneumatic tools safely

Review the manufacturer's instruction before using a tool.

Pneumatic tools must be maintained in a safe condition. All pneumatic tools are to be inspected for damage, hazards and, if applicable, check fluids prior to each use. If, upon inspection, the pneumatic tools do not appear to be in a safe, operable condition, the tool must immediately be removed from service, tagged, and brought to the shop for repairs or replacement.

Wear safety glasses or goggles and when necessary also wear a face shield.

When necessary wear hearing protection.

Ensure that the compressed air supplied to the tool is clean and dry. Dust, moisture, and corrosive fumes can damage a tool. An in-line regulator filter and lubricator increases tool life.

Keep tools clean and lubricated, and maintain them according to the manufacturers' instructions.

Use only the attachments that the manufacturer recommends for the tools you are using.

Be careful to prevent hands, feet, or body from injury in case the machine slips or the tool breaks.

Reduce physical fatigue by supporting heavy tools with a counter-balance wherever possible.

Handling air hoses

Use the proper hose and fittings of the correct diameter.

Use hoses specifically designed to resist abrasion, cutting, crushing and failure from continuous flexing.

Check hoses regularly for cuts, bulges and abrasions. Tag and replace, if defective.

Blow out the air line before connecting a tool. Hold hose firmly and blow away from yourself and others.

Make sure that hose connections fit properly and are equipped with a mechanical means of securing the connection (e.g., chain, wire, or positive locking device).

Install quick disconnects of a pressure-release type rather than a disengagement type. Attach the male end of the connector to the tool, NOT the hose.

Do not operate the tool at a pressure above the manufacturer's rating.

Turn off the air pressure to hose when not in use or when changing power tools.

Do not carry a pneumatic tool by its hose.

Avoid creating trip hazards caused by hoses laid across walkways or curled underfoot.

Do not use compressed air to blow debris or to clean dirt from clothes.

Guarding:

Where required, all pneumatic tools that are in need of equipment guarding shall be so equipped with guards and those guards shall be utilized during all phases of operation. Tools shall be guarded to ANSI standards so that all exposed moving parts are guarded to prevent exposing hazards to team members. Tool guards are not to be manipulated or removed in any way. If the tool's guarding devices are not in place, found defective or not operating correctly,

the tool should be removed from service immediately, tagged and sent to the shop for repairs, or replacement.

Personal Protective Equipment:

Team members using pneumatic tools who are exposed to the hazards of noise, flying, abrasive, and splashing objects, or exposed to harmful dusts, fumes, mists, vapors, or gases shall be provided with the particular personal protective equipment necessary to protect them from the hazard. All personal protective equipment shall meet the applicable OSHA and ANSI standards.

Types of Personal Protective Equipment to use:

Respiratory Protection: is any safeguard against harmful airborne particles not immediately dangerous to life and health. Carbon and paper-based filters are used in a variety of different respirators to purify the air and ensure you are only breathing in clean, non-toxic air. This type of PPE should always be used when you could potentially be exposed to dust, mist and fumes, and should always be a prime consideration when operating pneumatic tools.

Auditory Protection: is recommended for all instances where pneumatic tools or machinery are in use. The louder the equipment or pneumatic tool the more important it is for protection. Along with the class number hearing protection will have a decibel rating. This is the specific level of noise from which the user can be protected.

Visual Protection: should always be used when operating any pneumatic tool, as there are many flying particles which are capable of entering and damaging your eye. There are three main types of PPE for your eyes; safety glasses, safety goggles, and face shields.

Physical Protection: prevents physical harm while using pneumatic tools, it is generally in the form of boots, gloves and hard hats.

Process Safety Management / Contractor Requirements

Process Safety Management is put in place to eliminate hazardous consequences of catastrophic release of toxic, reactive, flammable or explosive chemicals in various industries such as refineries, etc. Each team member must be trained in work practices necessary to perform their job. All team members shall be advised of any unique hazards created or encountered by work or work practices.

Each team member must be trained in the known potential fire, explosion or toxic release hazards related to their job and the process and applicable provisions of the emergency action plan. The training is to be documented and include the identity of the team member, the date of training and verification that the employee understood the training. The Human Resource Manager is responsible for maintaining this documentation.

Team members must follow Opp Construction's safe work practices during all operations such as lockout/tagout, confined space entry, etc. Hot work should not be performed until a hot

work permit has been obtained. All team members must immediately report all accidents, injuries and near misses using our incident reporting procedure.

All team members must respect confidentiality of trade secret information when process safety information is released to them. The Chief Safety Director will review this program annually.

Respirator Program

Respirators should be used for protection only when engineering controls have been shown to be infeasible for the control of the hazard **or** during the interim period when engineering controls are being installed.

The Use of Respirators is the Least Satisfactory Method

Engineering and work practice controls are generally regarded as the most effective methods to control exposures to airborne hazardous substances. Opp Construction considers the use of respirators to be the *least* satisfactory approach to exposure control because:

Respirators provide adequate protection only if employers ensure, on a constant basis, that they are properly fitted and worn.

Respirators protect only the employees who are wearing them from a hazard, rather than reducing or eliminating the hazard from the workplace as a whole (which is what engineering and work practice controls do).

Respirators are uncomfortable to wear, cumbersome to use, and interfere with communication in the workplace, which can often be critical to maintaining safety and health.

The costs of operating a functional respiratory protection program are substantial, including regular medical examinations, fit testing, training, and the purchasing of equipment.

If engineering controls are not suffice or possible Opp Construction will require the use of an appropriate respirator selected by a competent person to control the hazard that is present. The respirator will be provided at **no cost** to the employee.

In any workplace where respirators are necessary to protect the health of the employee or whenever respirators are required by Opp Construction the employee will 1st be trained in worksite-specific procedures and the following:

Procedures for selecting respirators for use in the workplace.

Medical evaluations of employees required to use respirators.

Fit testing procedures for tight-fitting respirators.

Procedures for proper use of respirators in routine and reasonably foreseeable emergency situations.

Procedures and schedules for cleaning, disinfecting, storing, inspecting, repairing, discarding, and otherwise maintaining respirators.

Procedures to ensure adequate air quality, quantity, and flow of breathing air for atmosphere-supplying respirators.

Training of employees in the respiratory hazards to which they are potentially exposed during routine and emergency situations.

Training of employees in the proper use of respirators, including putting on and removing them, any limitations on their use, and their maintenance.

Opp Construction shall provide respirators, training, and medical evaluations at no cost to the employee.

The Chief Safety Director will review and updated this program as necessary to reflect any changes in workplace conditions that may affect respirator use.

Safe Vehicle Operation

The Safe Vehicle Operation Program is put in place to eliminate hazards associated with operating Commercial Motor Vehicles (CMV). The selection of vehicles begins with understanding that the wrong equipment can result in excessive breakdowns, create hazards to personnel, incur costly delays and contribute to poor service and customer complaints. The company will purchase vehicles designed for their intended use.

Only qualified & authorized operators are allowed to operate an Opp Construction CMV. To be qualified, drivers must possess and carry a valid and specific license or permit and carry a current medical card, including any applicable exemptions, issued by a licensed physician deeming them medically capable of driving a commercial motor vehicle. To be authorized, drivers must be covered under our commercial fleet insurance, have the approval of the shop superintendent as well as the direct supervisor, and have all company training including the required DOT and company paperwork on file with the Human Resource Manager. Authorization is to be based on ability to put company training into practice and follow all applicable safety rules and regulations set forth in this program.

DRIVER REQUIREMENTS

NON DOT DRIVERS
Medical Qualifications

A person shall not drive a CMV unless he is physically qualified to do so. The original or photocopy of a medical examiners certificate MUST be carried by the driver at ALL TIMES while operating a CMV. Medical cards need to be updated at least every 24 months unless your medical provider informs you otherwise. Opp Construction does not cover the cost of medical

cards. Medical examinations must be performed by a licensed medical examiner. Providers are listed below although team members may choose any licensed provider they wish.

Advanced Chiropractic Clinic
2840 19th Ave S
Grand Forks, ND 58201
701-772-2670
Dr. Fulp

Syvrud Chiropractic
825 25th ST S
Fargo, ND 58103
701-237-5150
Dr. Ryan Syvrud

General Qualifications

-Drivers must be at least 21 years of age.
-Drivers must read and speak the English language sufficiently to converse with general public, to understand highway traffic signs and signals, to respond to official inquiries and to make entries on reports and records.
-Drivers must be able to, by reason of experience, training or both, safely operate the type of CMV they drive.
-Drivers must be physically qualified to drive a CMV.
-Drivers must have prepared and furnished to Opp Construction the list of violations or the certificate as required by section 391.27.
-Drivers must not be disqualified from driving a CMV under the rules in section 391.15.
-Drivers must present an operator's license or certificate to Opp Construction.

DOT DRIVERS:
*DOT drivers are subject to the same General and Medical Qualification as NON DOT drivers.

Hours of service for Drivers

Opp Construction will not permit or require any driver, nor shall any driver drive:

-More than 11 cumulative hours following 10 consecutive hours off duty.
-For any period after the end of the 14th hour after coming on duty following 10 consecutive hours off duty.
-After having been on duty 60 hours in any 7 consecutive days.*
-After having been on duty 70 hours in any 8 consecutive days.*

*Any period of 7 or 8 consecutive days may end with the beginning of any off duty period of 34 or more consecutive hours.

On duty time means all time from the time a driver begins to work or is required to be in readiness to work until the time he or she is relieved from work and all responsibilities for performing work.

395.1(m) Exemption for construction materials and equipment

-Any period of 7 or 8 consecutive days may end with the beginning of any off duty period of 24 or more consecutive hours.

-Construction and pavement materials, construction equipment and construction maintenance vehicles.
-To or from an active construction site.
-Within 50 mile radius of the normal work reporting location of the driver.
-Does not apply to hazardous materials.

Drivers must record their duty status for each 24 hour period using the methods prescribes by the DOT in section 395.8.

Drug Testing

DOT drivers are subject to a federally regulated drug testing program. Opp Construction's Drug Free Workplace Policy complies with the federal requirements.

Drivers are required to obey all federal, state, DOT and local motor vehicle laws applicable to the operation of their vehicle. Drivers are required to take a defensive driving class at least once every three years. Defensive driving topics include safe speeds, following distances, and driving without distractions like the radio or cell phones. Seatbelts are to be worn by all drivers and passengers at all times. Use of alcohol, drugs or prescription medication that inhibits one's ability to drive or operate equipment is strictly prohibited while driving.

DRIVER INFORMATION

Driving Procedures

-Drivers must report all accidents immediately to the safety committee.
-Drivers must report arrests and traffic convictions to the safety committee within 24 hours.

Inspection of Driving Equipment

-Drivers shall inspect the vehicle daily, including checking all the fluid levels, before starting in accordance with any applicable DOT regulations and maintenance recommendations set forth by Opp Construction mechanics and management.
-Drivers shall determine that brakes are in proper working condition before operating equipment. If not working, they must be repaired before the vehicle is used. Report any defects to your supervisor.
-Company vehicles will be maintained in a clean and safe working order.

Vehicle Operation

-Driver's must always wear seat belts.
- Driver's are prohibited from texting or operating a CMV distracted.
-Clearly signal intentions of turning, passing, or stopping. Be extra careful at intersections. Use turn signals and remember to look around for other people and cars.
-Drivers shall be courteous toward other operators and always allow pedestrians the right of way.
-Drivers shall yield the right of way in all instances to avoid accidents.

-Drivers will maintain a safe following distance observing the 4 second rule on highways and 3 second rule in residential areas.

When Backing

-Check blind spots when changing lanes or backing up.
-Keep your rearview and side mirrors adjusted for maximum visibility.
-Keep a constant lookout during the entire driving time.
-Back slowly.
-Use a spotter if necessary. Always keep the spotter in view and be able to communicate with them.

When Changing Lanes

-Always check your side and rearview mirrors for traffic approaching you from behind. Signal to communicate to other drivers your intention to change lanes.
-When driving on a multi-lane highway, stay in the right-hand lane if you are driving slower than the traffic around you.

Vehicle Maintenance

-Opp Construction requires all personnel responsible for driving a vehicle to check the oil EACH time the vehicle is filled up with gas. Clean out garbage daily.
-Pre-trip vehicle inspections that examine common problem areas on CMVs must be performed daily.
-Any vehicle with mechanical problems MUST be withdrawn from service IMMEDIATELY.
-Vehicles are periodically withdrawn from service at scheduled checkups for comprehensive inspection and scheduled vehicle maintenance.
-Vehicles are to be maintained on a DAILY basis. They are to be parked neatly in the lineup. All doors and windows must be closed and lights turned off with keys out of ignition. Drivers will be held accountable for the condition of the vehicles they drive.

To ensure Opp Construction's policy regarding vehicle operation Shaylee Brien, Human Resource Manager has been appointed the responsibility of managing our driver program and ensuring the appropriate disciplinary action is taken for violators of the Vehicle Operational Policy or the Fleet Safety Compliance Manual. Foremen and Managers will be trained on the requirements and will be responsible for ensuring no operating takes place without first fulfilling all of the necessary requirements.

Opp Construction Company is firmly committed to providing all of its team members with a safe and healthy working environment. It is a matter of company policy that all employees are well trained in safety related issues and provided with adequate information to keep them safe on the job site.

Sandblasting and Grinding

Only Opp Construction team members who have been trained how to safely operate sand blasters and grinders are permitted to perform these functions. Prior to doing any sand blasting and grinding, all equipment used is to be inspected for damage, functionality and to ensure that all safety guards are in place. Should any defects be found, equipment is to be tagged and removed from service immediately and sent to the shop for repairs.

The following are some general guidelines to follow when sand blasting and grinding.

All sand blasting is to be done outside. When sand blasting, team members are to use the following personal protective equipment: hard hat, face shield with safety glasses, ear plugs, respirator, heavy canvas or leather gloves and apron, and leather work shoes.

All grinding machines shall be supplied with sufficient power to maintain the spindle speed at safe levels and be equipped with safety guards. Team members are to always wear ear plugs as well as safety glasses when using a hand grinder.

Scaffold Safety

The purpose of the Scaffold Safety program is to ensure all team members properly set up and use scaffolds to prevent falling. All team members are subject to our Scaffold Safety Program. Scaffolds shall be used whenever work cannot be done safely from ground level. The scaffolds must have solid footing or anchoring capable of holding the load without settling or shifting. NO unstable objects such as barrels, loose bricks, rocks, boxes or similar unstable items should be used to support the scaffold or planks. Scaffolds shall be capable of supporting four times the maximum intended load.

It is the policy of Opp Construction that if a team member needs to work on a scaffold that they must be trained by a person qualified in the subject matter to recognize hazards. The training shall include the following:

Identifying and eliminating Electrical hazards and falling object hazards; Procedures for dealing with these hazards, operating and maintaining fall protection systems, proper use of scaffolds, load limits, and any other pertinent information related to the specific job site.

Other topics covered in this training will include:

-Scaffolds must be maintained in safe condition and not be altered or moved horizontally when they are in use or occupied

-Tools, materials, and other debris shall not be allowed to accumulate in any quantities that could be hazardous to workers on scaffold

-Guardrails and toe boards will be installed on all open sides and end of platforms more than 10 feet above ground or floor. Scaffolds 4 to 10 feet high which are less than 45 inches wide must also have guardrails installed on all sides and ends.

-Planking will be scaffold grade, or equivalent. Overlap planking a minimum of 12 inches or secure from any movement. All scaffolding planks shall extend over their end supports no less than 6 inches or more than 18 inches.

-Scaffold with tubular welded frames will be properly braced by cross bracing or diagonal braces, or both, for securing vertical members together laterally. Cross braces will be of such length as will automatically square and align vertical members so that the erected scaffold is always plumb, square, and rigid. All brace connections will be made secure. The frames shall be placed one on top of the other with coupling or stacking pins to provide proper vertical alignment of the legs.

This policy and the training is communicated to team members upon hire and annually thereafter at the Spring Kick Off. Safety training is done on site should changes in the types of scaffolds, fall protection or other equipment or circumstances have changed and the team member hasn't previously been trained on them. The team member is to be retrained when he or she has proven that he or she did not retain the proficient knowledge to operate around scaffolds safely.

Prior to each use and periodically throughout the shift and/or job duration scaffolds are to be inspected by a competent person for damage and to be determined fit for safe use. All scaffolds are to be maintained in a safe condition. If there is a defect discovered or some element of the inspection makes the scaffold unfit for use it should immediately be removed from service, tagged and sent to the shop for repairs or replaced.

The Chief Safety Director is responsible for enforcing this program and will review it annually.

Short Service Team member

Opp Construction's Short Service Team member Program is put in place to provide extra guidance and mentoring to new team members. All team members must be aware of and follow the guidelines in this program. A Short Service Team member is any team member who has been with Opp Construction less than 90 days.

A Short Service Team member must work under direct supervision and may not be left alone. This supervisor is the short service team member's mentor and is to assist them with their development. Training on how to be a proper coach is to occur on an annual basis. Owner Clients must be notified of Short Service Team members who will be working at their site. All Short Service Team members must wear the new hire vest; this vest is to be orange and Class II with Safety 1st written on the back below the Opp Construction logo. After the team member has completed 90 days of service and/or with approval of the Supervisor that they meet the basic skills needed to safely work alone at times they can return their vest for a regular vest.

Subcontractors must treat their short service team members in accordance with the requirements in this program. The Chief Safety Director is to review this program on an annual basis.

Stop Work Authority

Stop Work Authority is put in place to ensure any team member has the authority to stop work when control of health and safety risk is not established or understood. Stop Work Authority applies to all team members at Opp Construction. Team members are to complete documented training on the contents of this program before initial job assignment and on an annual basis.

All team members at Opp Construction have the authority to stop any task or operation where there are concerns that a Health and Safety Risk (HSE) is not controlled or understood. No work is to resume until all stop work issues and concerns have been addressed and the HSE risk is controlled and/or understood by all affected team members. Team members are responsible for issuing a Stop Work Intervention. No team members will be disciplined to any degree for issuing a stop work for a HSE concern. It is management's responsibility to create a culture where Stop Work Authority can be exercised freely.

The steps of the Stop Work Intervention are to notify your supervisor when an unsafe condition is identified. Stop Work intervention is then initiated by your supervisor in a positive manner by notifying all affected personnel and correcting the issues. Work will resume only when safe to do so. Supervisors are responsible for documenting the Stop Work Intervention and noting lessons learned and the corrective measures used prior to resuming work.

Management will review all documentation of the Stop Work Intervention. Information will be entered into the crew reporting matrix and findings should include crew participation, quality of intervention, any follow up, trend issues and opportunities for improvement. Follow up is important to ensure all parties are satisfied with the outcome of the Stop Work Intervention. Most Stop Work Interventions can be resolved in a timely manner at the job site.

Subcontractor Management Program

This program is put in place to ensure all sub contractors comply with the standards of the industry while performing work for clients of Opp Construction. Subcontractors must pre-qualify prior to being awarded contracts. Subcontractors will be qualified based on their safety program, safety statistics and other qualifying data.

Opp Construction will utilize acceptable methods such as Experience Modification Rate (EMR) statistics when selecting sub-contractors. Subcontractors are to be included in any pre job meetings and safety specific orientations. During the project all subcontractors must be included in weekly tailgate meetings, job hazard analysis and any safety inspections. Subcontractors have the authority to stop work if they see any unsafe work practice or potential hazards that need correcting. After work is completed post-job safety reviews will be completed by the project manager and kept in the subcontractors safety qualification file.

The Chief Safety Director is responsible for reviewing this management plan annually.

Trenching / Shoring / Excavations

The Trenching/Shoring/Excavations Program is put in place to protect team members from the hazards associated with digging. All team members are subject to the contents of this program. Documented training is to be completed prior to work assignment and on at least an annual basis thereafter.

The location of underground utilities must be determined prior to excavation. Foremen are responsible for having public utilities marked, ensuring they are properly refreshed and ensuring the customer has had the private lines marked. Team members are prohibited from mechanical digging on job sites where public and private utilities are not marked at the request of Opp Construction and the valid & not expired locate ticket is in their possession at the jobsite for review.

Violating Opp Construction Excavation Policy on utility locates is a violation of local state law for the state you are operating in & disciplinary action will be taken accordingly. In North Dakota it is North Dakota Century Code 49-23-01 to 07 & MN State Statutes Chapter 216D.

Competent Person: An Opp Construction Competent person is a trained team member who is capable of identifying existing and predictable hazards in the surroundings or working conditions which are unsanitary, hazardous or dangerous to team members and who has the authority to take prompt corrective measures to eliminate them. They must be knowledgeable of standards, can identify hazards specific to operations, and have the authority and knowledge to correct seen hazards. They are responsible for performing daily inspections, or as warranted by job site conditions.

Pre-Dig & Preparation should happen prior to any excavation at Opp Construction. This includes making sure that all people working around the excavation are trained in utilities, competent in damage prevention & have a plan for working around utilities & excavations. The competent person on site should identify all utilities within project limits, identify the locations of the utilities within the limits of excavation, identify the utility operator/owner & preplan for conflicts.

Documentation of Markings: The competent person should use photographs from a distance to document the placement of all utility markings. Sketches can be used to record distances from fixed objects. If underground utilities are not properly marked & are damaged proper documentation, such as photos of markings prior to excavation helps to prevent timely disputes.

Preservation of Markings: Location marks should be maintained during the course of the job; if the location markings are no longer visible, excavation must stop in the surrounding area & a locate re-fresh must be made.

Tolerance Zones (Hand Dig Zones): After markings have been made, excavation is required to maintain a minimum of 24" between an unexposed facility and the cutting edge or point of any power operated excavating or earth moving equipment. If the markings indicate a 6" pipe is buried, the "hand-dig' zone is 54" wide (3" +24" on each side of the mark). The excavation must be performed very carefully, with vacuum excavation or hand tools, and without damage to the facility or undermining of lateral support.

Mismarked Facilities: When an excavator finds an unmarked or inaccurately marked facility, excavation stops in the vicinity of the facility and notification takes place. If excavation continues, the excavator plans the excavation to avoid damage and interference with other facilities and protects facilities from damage.

Soil Mechanics & Classification: The soil make up of a trench or excavation can affect the hazards present. Soil collapse in trenches can happen many different ways. Most commonly they happen in the form of tension cracks, sliding rock, toppling spoils, bulging, heaving or boiling excavations. Competent persons are trained how to evaluate soil mechanics and identify warning signs of these types of soil collapses.

Visual and manual tests are imperative to detecting warning signs of soil collapse. Soil classification tests vary depending on the type of soil. Type A: Clay, Silty Clay and Clay Loam, would use a manual test. Type B: angular gravel, silt, silty loam, and sandy loam, would use a visual or manual test. Type C: Gravel, sand, loamy sand, would require a visual test only and Stable rock like granite and sandstone could be done using a testing device. There is further detail on testing types below. Each competent person is trained on which tests to use on what types of soils.

Soil Classification Identification can be done a number of ways. Opp Construction utilizes the following methods: Visual tests such as viewing the visual appearance of the soil identifying clumps and grains, and examining the excavation. Manual Tests involve taking a sample of the soil and rolling it into a ball or thread to see if it clumps or crumbles. Testing equipment can be used to identify soil types and Opp Construction educates team members on three types: Thumb penetration, pocket penetrometer, and shearvane. The Thumb penetration involves pushing a thumb into the soil and based on depth of the imprint the soil classification can be determined in conjunction with visual tests. Pocket penetrometers are pressed into soil at a specific depth and the device gives a direct reading of the unconfined compression strength which will identify the soil type. A shearvane tool's blades are pressed into a level section of undisturbed soil and the torsional knob is turned until soil failure occurs. The dial reads strength at failure and from that one can deduce the soil type.

Trench Protective Systems: Excavation depth, soil type and job site characteristics will determine the type of protective system to use on a job site. Methods to use are shoring, shielding, sloping and benching. Competent persons are educated in all these methods which are outlined below.

Shoring can be timber, aluminum hydraulic, pneumatic, screw jacks, and under pinning. Competent persons are trained on the advantages and disadvantages of using each method and which situations warrant certain types of shoring.

Shielding in the form of trench boxes is a costly option and often installed in combined use with shoring. Installation and load bearing restrictions are extensive.

Sloping is the most commonly used protective system used alone or in a combined use. Sloping ratios needed for sloping alone or sloping used in conjunction with a support or shield system are as follows: Type A soil has a ¾ : 1 ratio. Type B Soil has a 1:1 ratio and Type C Soil has a 1 ½: 1 ratio.

Ratios for sloping as a stand-alone option are the same but if there are multiple soil types layered within one excavation the highest ratio must be used.

Benching has two options; Single (aka Simple) or Multiple. Benching is used in combination with sloping. The ratios of benching systems is the same and sloping system.

Surface crossing of trenches: Must be designed by professional engineer and if walkways or bridges are provided for foot traffic they must have a safety factor of 4 (ratio of material strength to design load, ie. If plywood is being used and plywood can hold 45 lbs and what is being transported is 200 lbs (a man) that is a factor of .225 or not strong enough to be used as a means of crossing a trench), minimum width of 20 inches, be fitted with standard rails and extend a minimum of 24 inches past surface of trench edge.

Ingress and Egress of trenches: Trenches with a depth of 4 feet must have fixed means of ingress and egress and should be within 25 feet of lateral travel. Ladders must be fixed and extend beyond the excavation or trench three feet.

Exposure to and Protection from Vehicles and Falling Loads: Trenches should be barricaded and traffic directed by a certified flag person or protected by barricades. Team members must wear high visibility PPE. Team members are prohibited from working under loads of digging equipment where loads may fall.

Warning Systems for Equipment: All trenches and excavations must be barricaded, use spotters, stop logs and grade soil away from excavations to prevent equipment and vehicles from falling into trenches.

Hazardous Atmospheres and Confined Spaces: Team members are to have a competent person test for air contaminants before entry and at regular intervals throughout the duration of the job. Tests should occur more frequently if equipment is operating near or in the trench that could cause the atmosphere of the trench to change (i.e. welding, cutting or burning)

Water Accumulation: Water accumulation in trenches affects the makeup of the soil type and can severely alter the strength of the wall of the trench or excavation. All team members must use the required support or shield system and re-evaluate if that is the right system after water has been introduced to the work area. Water removal equipment should be used and water

levels monitored by a competent person. Surface water should be diverted away from trenches and excavations. Team members are not to work in trenches or excavations during or right after rainstorms. Trenches and excavations should be inspected by a competent person after each rain before team members are allowed to re-enter excavations.

Inspections: Competent persons working on trench and excavation job sites are to do inspections frequently. They are trained to do inspections at the following times: Daily and before each shift; as dictated by the work being done in the trench; after each rain; after other events that could increase hazards; when fissures, tensions cracks, slouighing, undercutting, water seepage, bulging or similar conditions occur; when there is a change in size, location or placement of the spoil pile; or when there is any indication of change or movement in adjacent structures.

The Chief Safety director and will review this program on an annual basis to determine its effectiveness within our organization.

Waste Management

Opp Construction's Waste Management Policy is put in place to ensure that every effort is made to minimize and properly manage waste and dispose of it in accordance with all applicable federal, state, and local regulations. Continually improving and utilizing recycling systems for various materials is of prime importance.

Prior to the beginning of a project, it is management's responsibility to estimate the waste that will be generated so the type and size of waste containers and other waste removal systems can be determined and planned. All waste should be properly maintained to minimize the potential for a spill. Waste should be in containers, covered or removed from site to prevent run-off. Waste materials should be segregated from the beginning of the project to optimize recycling opportunities.

Concrete and asphalt chunks, as well as gravel removed from jobsites are typically loaded in separate trucks and hauled to the appropriate recycle pile west of the asphalt plant. Dirt, sod, clay, etc. are typically loaded separately and brought to the corresponding recycle pile at our yard.

Any metal objects salvaged from a jobsite are to be brought to the shop to be recycled "in house" or sold as scrap metal, at the discretion of shop foreman and superintendent.

Liquids are typically not to be stored at a jobsite. Gasoline, diesel, oil, cure, etc. are to be brought to a jobsite by truck or pickup and transferred directly to equipment tanks or dispensers.

If the size and remote location of a job site should ever make this policy impractical, a proper containment area must be constructed that complies with all applicable laws and regulations.

Every effort must be made to minimize personal and non-hazardous construction waste on the jobsite. Management will help determine type and size of trash containers to be used for this type of waste. These containers are to be emptied in the dumpster behind Opp Construction's Shop. Forms, stakes steel bars, and other reusable materials are to be salvaged and reused as many times as possible.

Any Hazardous materials used or encountered will be handled and discarded in accordance with appropriate federal, state and local regulations and material safety data sheet instructions.

Team members are comprehensively trained on Waste Management annually. In addition, waste management, spill prevention and response, storm water pollution prevention and hazmat training are regular topics at our weekly safety meetings.

Water Safety

The purpose of the Opp Construction water safety policy is to ensure the safety off all Opp employees while working in or near a body of water. Water safety procedures should be observed while working in both shallow and deep bodies of water.

Know your surroundings

- Be aware of the depth of any water you will be working in or near.
- Observe any hazards around your work site, and any change in terrain. Rocks in the water tend to be slick and therefore are a great slip and trip hazard.
- Identify any hazardous water temperatures, and take necessary precaution. Working in water with temperatures below 70°F can cause someone to have issues breathing. Take extreme caution when working in water with temperatures below 60°F. Temperatures this low will cause someone to lose the ability to control their breathing, and can also cause cold shock.

Wear the proper PPE based on the types of water hazards presented to you, including but not limited to:

- U.S. Coast Guard approved personal flotation device (PFD) while working in or near water of depths greater than 2 feet.
- Water shoes
- Waders
    - A PFD should always be worn with waders as well as a wader belt.
    - Be aware of wader safety.
        - https://www.youtube.com/watch?v=3-0ESaMvCd4

Working in or near water as a lone worker or on a crew

- There should be at least two employees on a jobsite when entering or working in close proximity to water greater than 2 feet; unless the customer has been notified and is willing to assist a lone worker.
- Lone workers need to follow the lone worker program as well as checking in with their foreman/ supervisor when work in or near the water has concluded.

Welding, Cutting, Heating & Hot Work

Only Opp Construction shop mechanics trained in the safe operation of their equipment and the safe use of the process are permitted to use welding or cutting equipment. Before welding, operators should inspect equipment to ensure guards are in place and that there are no defects or hazards associated with the equipment or with the worksite. If hazards or defects are found the equipment is to be tagged, and removed from service immediately.

The following are guidelines the shop mechanics and trained team members are to following when heating or cutting and operating in or around these conditions:

-Always wear approved tinted eye protection when welding or in areas where welding is being done

-All welding that is to be done in a confined space needs to be approved and a permit requested and granted before welding can occur.

-Use fans and other ventilation systems to keep areas ventilated

-Keep a fully charged fire extinguisher near the work area

-Eliminate fire hazards by removing combustibles from the work area (a minimum in of 35 feet) and provide a fire watch

-No welding, cutting or other hot work shall be performed on used barrels, drums, tanks, or other containers until they have been cleaned so thoroughly as to make absolutely certain that there are no flammable materials present or any substances such as greases, tars, acids or other materials which, when subjected to heat, might produce flammable or toxic vapors. Any pipe lines or connections to the drum or vessel shall be disconnected or covered.

-Any hollow spaces, barrels, drums or other containers shall be vented to permit the escape of air or gases before preheating, cutting or welding.

-When welding or cutting over combustible floors, protect the floor with fire resistant shields or damp sand.

-When electrode holders are left unattended, electrodes will be removed and the holder will be placed or protected so it cannot make electrical contact.

-Never coil or loop welding cable around your body.

-Unplug welder when it is unattended

-Inspect cables and fuel and oxygen hoses periodically. Replace any that are defective.

-When removing the regulator to switch tanks, first close the valve and release the gas pressure from the regulator.

-Be sure that a red hose is used for acetylene or other fuel and that a green hose is used for oxygen.

-When finishing cutting or heating, be sure to close all valves.

Remain at the work area to monitor for smoldering fires while work is in progress and for at least 30 minutes following job completion. If fire watch must leave the work site, all hot work activities must stop.

Work Zone Safety

The Work Zone Safety Program is put in place to protect team members from the hazards associated with setting up the “Cone Zone”, taking down the Cone Zone and working in the Cone Zone. All team members are subject to the contents of this program. Documented training is to be completed prior to work assignment and on at least an annual basis thereafter.

Opp Construction may at times have work zones or “Cone Zone” that will require a certified traffic control person who will be designated and responsible for the design of the closure, the setup, take down and the maintenance of that Cone Zone while the work is being performed.

Setting up and taking down a Cone Zone can be the most dangerous part of your day. All employees involved in traffic control operations whether high or low risk will be adequately trained.

Knowing how to properly set up and take down a roadside work zone (“Cone Zone”) can help keep you and your co-workers safe.

Set-up Procedure

Depending on the work zone layout, you will require different types of traffic control equipment. Once this is determined remember the following:

Make sure you’ve got the required equipment (signs, cones, barriers). If you are using radios to communicate, make sure all are working.

Set up your Cone Zone devices in the order that drivers will encounter them. Begin with the sign or device that's farthest away from your work area.

Never turn your back to traffic while setting up.

Once the Cone Zone is set up, travel through it to view it from a driver's perspective.

Make sure the guidance is clear, easy to follow, and that workers are clearly visible.

Check periodically to make sure the signs and devices are still in place.

While the work is in progress

The competent person will make sure that all activities are completed safely within the Cone Zone and that all workers are clearly visible. Also, that all devices are in the proper place. While entering or exiting the Cone Zone (if needed) a qualified "flagger" will be used.

Take-down Procedure

Take down the Cone Zone when the roadside work is completely finished.

Remove the devices in the opposite order of the set-up.

Signs should be removed last.