

# EMERGENCY RESPONSE PLAN



September 2012  
Dover Plains, New York

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CONTACT	NAME	PHONES (Land Line)	Mobile (Cellular)
Plant Manager		Work: Home:	
EH&S Manager		Work: Home:	
Operations Manager		Work: Home:	
Maintenance Manager		Work: Home:	
Control Room Operator		Main Emergency:	

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## ***FIRE EMERGENCY***



911 or

## ***MEDICAL EMERGENCY***



911 or

## ***ENVIRONMENT RESPONSE***

- NYSDEC – 24hrs
- EPA Region 2 – 24hrs



## TABLE OF CONTENTS

## Cricket Valley Energy – EMERGENCY PHONE NUMBERS

### Response Team Contact List

<b>Role</b>	<b>Title - Name</b>	<b>Training</b>	<b>Work Phone</b>	<b>Home Number</b>	<b>Cell Phone</b>	<b>Response Time</b>
Communications Coordinator	Control Rm Operator					
Incident Commander (1st)	EH&S Mgr - TBD					
Incident Commander (2nd)	Plant Mgr - TBD					
Incident Commander (3rd)	Operation Mgr – TBD					
Incident Commander (4th)	Maintenance Mgr - TBD					
Emergency Commander (1st)	EH&S Mgr – TBD					
Emergency Commander (2nd)	Plant Mgr - TBD					

### Emergency Response Contractors/Co-Op

Contractor/Co-Op	Phone	Response Time	Contract Responsibility
ABC		1 Hour or less	OSRO (Primary)
XYZ		1 Hour or less	OSRO (large spill to water)
123		1 Hour or less	OSRO
		1 Hour or less	

### Other Phone Numbers and Contacts

Off-Site Resources		
Role	Name/Title	Telephone #'s
O&M Region Manager		
O&M Region EH&S Mgr.		
APNA EH&S Mgr.		
Legal Counsel		
APNA Air Program Lead		
APNA Water Program Lead		
APNA Waste Program Lead		

Fire & Ambulance Departments		
Role	Name/Title	Telephone #'s
Ambulance/Fire		9-1-1 / **
NY Fire Marshall		**

Law Enforcement		
Role	Name/Title	Telephone #'s
Police	Dover, NY	9-1-1 / **
Police	Pawling, NY	9-1-1 / **
State Police - NY	New York State Police	9-1-1 / **
State Police - CT	Connecticut Police	9-1-1 / **
FBI	New York (Sabotage & Terrorism)	**
FBI	Local City, NY – Senior Resident	**
FBI	Agent	**
US Marshall's Service	NY Branch	**

<b>Hospitals</b>		
<b>Role</b>	<b>Name/Title</b>	<b>Telephone #'s</b>
Hospital (1st) City, NY	Local Hospital	
Hospital (2nd) City, NY	Local Hospital	
Hospital (3rd) City, NY	Regional Hospital	

<b>Nearby Business &amp; Residences</b>		
<b>Role</b>	<b>Name/Title</b>	<b>Telephone #'s</b>
North of Site -		
North of Site -		
North of Site -		
West of Site -		
West of Site -		
South of Site -		
South of Site -		
South of Site -		
East of Site -		
East of Site -		
East of Site -		

<b>Utilities</b>		
<b>Role</b>	<b>Name/Title</b>	<b>Telephone #'s</b>
NYISO	New York Grid Operator	
Constellation Edison (ConEd)	Transmission/Substation/SWYD	
ISO-NE	New England Grid Operator	
New England Utilities (NU)	East Utility Substation	
NYSEG	Local Electricity (distribution)	
Iroquois Gas Transmission	Interstate Natural Gas Pipeline	
Iroquois Dover Comp'r Station	Interstate Natural Gas Pipeline	

<b>Federal #'s</b>		
<b>Role</b>	<b>Name/Title</b>	<b>Telephone #'s</b>
OSHA	To report serious injuries	800-321-6742
EPA Region	To Report Spills	
ChemTrec	Chemical Information	800-424-9300

<b>State of New York's #</b>		
<b>Role</b>	<b>Name/Title</b>	<b>Telephone #'s</b>
NYS Dept of Env. Conservation	Hazardous Materials Spills	
NYS Dept of Env. Conservation	Temporary Hazardous Waste ID	
NYS Dept of Env. Conservation	Oil Spill Response	
NYS Dept of Env. Conservation	Off-Hours - State Police	
NYS Dept of Env. Conservation	Spills to Storm Water	
NYS Dept of Env. Conservation	Waste Water Spills	
NYS Dept of Env. Conservation	Air Resources - Air Emissions	
NYS Depart. of Transportation	To Report Spills	

<b>Sensitive Area Trustees</b>		
<b>Role</b>	<b>Name/Title</b>	<b>Telephone #'s</b>
Trustee	i.e. FROGs, etc.	
Trustee		

<b>Town of Dover and Dutchess County #'s</b>		
<b>Role</b>	<b>Name/Title</b>	<b>Telephone #'s</b>
Dover Supervisor		
Dover Town Clerk		
Dover High/Middle School		
Dover Highway Department	Town Garage - Snow Plow	
Dutchess Health Department	Well Water Supply	

<b>Other #'s</b>		
<b>Role</b>	<b>Name/Title</b>	<b>Telephone #'s</b>
Local TV/Radio for Evacuation		911
Local TV/Radio for Evacuation		

## 1.0 INTRODUCTION

The Cricket Valley Energy Center (CVEC) Project is a 1,000 MW gas fired combined cycle power plant, which will use state-of-the-art technology and environmental controls that provide extremely high operational efficiency and low air emissions. The power will be distributed to the regional grid via the local Consolidate Edison Company of New York (“ConEd”) high-voltage transmission lines which are next to the Project site.

The property consists of five (5) parcels totaling 193.5 acres and is located at 2241 Route 22, Dover, Dutchess County, New York. Immediately to the north of Property is an existing ConEd electric transmission right-of-way, which also abuts an Iroquois Gas Transmission Company (“Iroquois”) natural gas pipeline which will provide fuel to the facility. In addition, the Property is bounded to the east by New York State Route 22; to the south by Rural-zoned property; and to the west generally by the Swamp River. A Metro-North railroad track transects the Property in a north-south direction.

The CVEC Facility will be operated and maintained through an Operations and Maintenance (O&M) contract. The O&M Contractor will have personnel on site full time and CVEC will have a representative dedicated to the facility but may only be on site on an as needed basis.

This Emergency Response Plan (ERP) has been structured to exist as a separate document that may be used to actively respond to an emergency incident, however the majority of this document was developed in conjunction with the facility’s Spill Prevention Control and Countermeasure Plan (SPCC) and Spill Prevention Report (SPR). These documents have been developed to meet the requirements for Title 40, Code of Federal Regulations, Part 112 (40 CFR 112) and Title 6 of the New York Codes, Rules and Regulations 6 NYCRR Parts 595 through 599, respectively.

This ERP includes the most critical information to respond to an emergency incident:

- Emergency Phone Number;
- Discussion of Response Activities; and
- Facility Maps and Emergency Procedures.

## 2.0 DISCOVERY

The objective of Incident Discovery is to describe the appropriate response actions to take when an observed or potential incident is initially identified at the CVEC facility. The person detecting an incident can provide immediate action to either facilitate subsequent response actions, or resolve the incident. This procedure shall be followed by all personnel at the facility.

### 2.1 Initial Response

The following procedures will be developed to address initial response at the CVEC facility:

- Medical Emergency Procedure
- Emergency Evacuation Procedure
- Fire and/or Explosion Procedure
- Spill/Release Procedure
- Security Disturbance, Bomb Threat Procedure and, Suspicious Mail/Packages
- Severe Weather Procedure
- Anhydrous Ammonia Release Procedure
- Civil Strife and Sabotage/Terrorism Threat Procedure

#### 2.1.a Procedures for internal and external notifications

Internal notifications are completed as described in Incident Discovery. Employee notification for evacuation, specifically related to alarm systems, is described in Emergency Evacuation Procedure. Notification and evacuation of the public in the event of an anhydrous ammonia release is described in Anhydrous Ammonia Release Procedure.

External verbal and written notifications are completed as specified in all reporting and notification requirements.

#### 2.1.b Establishment of a response management system

The response management system the facility will be provided in the organization chart (Response Management System). The system specifies emergency responsibilities at the facility. This involves the development of an incident/emergency response organization and action plan to address small and large spill/release incidents and non-spill emergencies at this facility.

The response management system is put into action upon discovery of an emergency situation.

#### 2.1.c Procedures for preliminary assessment of the situation.

Procedures for incident assessment will be developed to provide detailed instructions and information related to preliminary assessment of emergency incidents.

#### 2.1.d Procedures for establishment of objectives and priorities

This section of the ERP identifies the objectives and priorities for specific types of emergencies at the facility. Objectives will be determined by the Incident Commander upon notification of an incident. The following general objective will be established for all response activities:

"To complete emergency response activities as quickly and as safely as possible to minimize damage to the environment and property while ensuring the safety of the public and plant personnel."

More specific objectives will be defined by the Incident Commander as actions are implemented as described in the Spill/Release Procedure.

In all emergency incidents, regardless of the quantity or type of chemical released, the following general priorities will be established for all response activities:

1. Protect Public and Plant Personnel;
2. Protect the Environment;
3. Protect the Plant Property.

Detailed prioritization will occur as actions are implemented as described in the Spill/Release Procedure.

#### 2.1.d.1. Mitigating Actions

The Emergency Response Procedures (ERP's) are to be used to determine mitigating actions to be taken based on the type and magnitude of the incident.

#### 2.1.d.2. Identification of resources required for response

See the emergency phone and contact lists at the beginning of this ERP for the listing of available resources (personnel) and a list of available materials, quantities and locations for emergency response shall be developed in conjunction with all the local emergency responders.

#### 2.1.e Procedures for implementation of tactical plan

The tactical plan is established in the ERPs. Implementation is based on training on the plan and established procedures, communications both internal and external, and utilizing the response management system described above.

#### 2.1.f Procedures for mobilization of resources

Pre-planning is the key to mobilization of resources. All plant personnel are trained in the use of the ERP's, the emergency phone, contact, and resources lists. Off- site resources (Fire, OSRO Contractor, and other critical resources) have been notified, consulted or contracted with prior to the need for their services.

## 2.2 Sustained Actions

Longer term emergency responses generally transition into diverse mitigation strategies and recovery operations. These longer-term actions rely heavily on extended support functions such as lighting, heating, additional supplies, catering of food, rotation of staffing. These functions are addressed in the supplies/resources section of the ERP as well as phone numbers and contacts for additional support. Additionally the ERPs present areas identify the general procedures and/or actions to be taken for a particular emergency. However, the Incident Commander is responsible for developing an emergency-specific response plan appropriate to the nature and complexity of the emergency.

Once the emergency response actions are underway, further assessment by the Incident Commander or his/her designee is required to ensure that the course of action selected is the best possible. An on-going assessment should be performed to ensure that:

- The initial assessment of the emergency was accurate.
- The emergency response procedure is working effectively.
- Hazards to personnel, the public and the environment are being controlled.

Questions to be answered by the on-going assessment address four key areas:

### The Public and Plant Personnel:

- Is a material being released or potentially being released in quantities likely to affect the public or plant personnel?
- How soon might they be at risk? Should they be evacuated or sheltered?
- What areas of the plant or community are at risk (direction and distance)?

### The Environment:

- Is material being released or potentially released in exceedance of reportable quantities?
- Can the release be contained, diverted or reduced to minimize possible environmental impact?

### Plant Property:

- Is the emergency likely to spread to other areas (and, if so, how soon)?
- Will the hazard affect plant utilities or systems needed for safe operation?
- How soon can processes be shut down, and how must this be coordinated?

### Emergency Response Actions

- Is there anything now known about the current status of the emergency that conflicts with the magnitude or nature of a previous assessment?
- Are the current actions effectively mitigating the hazard?

- Is there any additional course of action, or any additional resource, which would significantly improve the effectiveness of the action plan?

The on-going assessment is a critical tool to evaluate the current status of the response, and to keep the response actions focused on the best approaches to mitigate the emergency.

### 2.3 Termination and Follow-Up Actions

The Incident Commander, in conjunction with the Emergency Response Organization (ERO) members, is responsible for determining when the emergency is over. Consulting with off-site response agencies and/or emergency response contractor(s) may be required.

Termination should consider at a minimum:

- Is the situation stable and under control?
- Is there likely to be any release of materials or other hazard to plant personnel, public or the environment?
- Are the spill materials properly stored in accordance with the compatibility of the original material?
- Is there any need for the continued presence of off-site response contractors?
- Is there any need for continued involvement of the on-site emergency response organization?

### Emergency Documentation

Once an incident is declared over by the Incident Commander, an Emergency Response Incident Report shall be completed. The report, which shall be completed by the Incident Commander or his/her designee, must include any pertinent information gathered during the response process.

Each form will be numbered and will become an official report for the incident. A copy of the form shall be filed in the EH&S department. Any of the documentation necessary to support the information contained on the form shall be included or its location referenced.

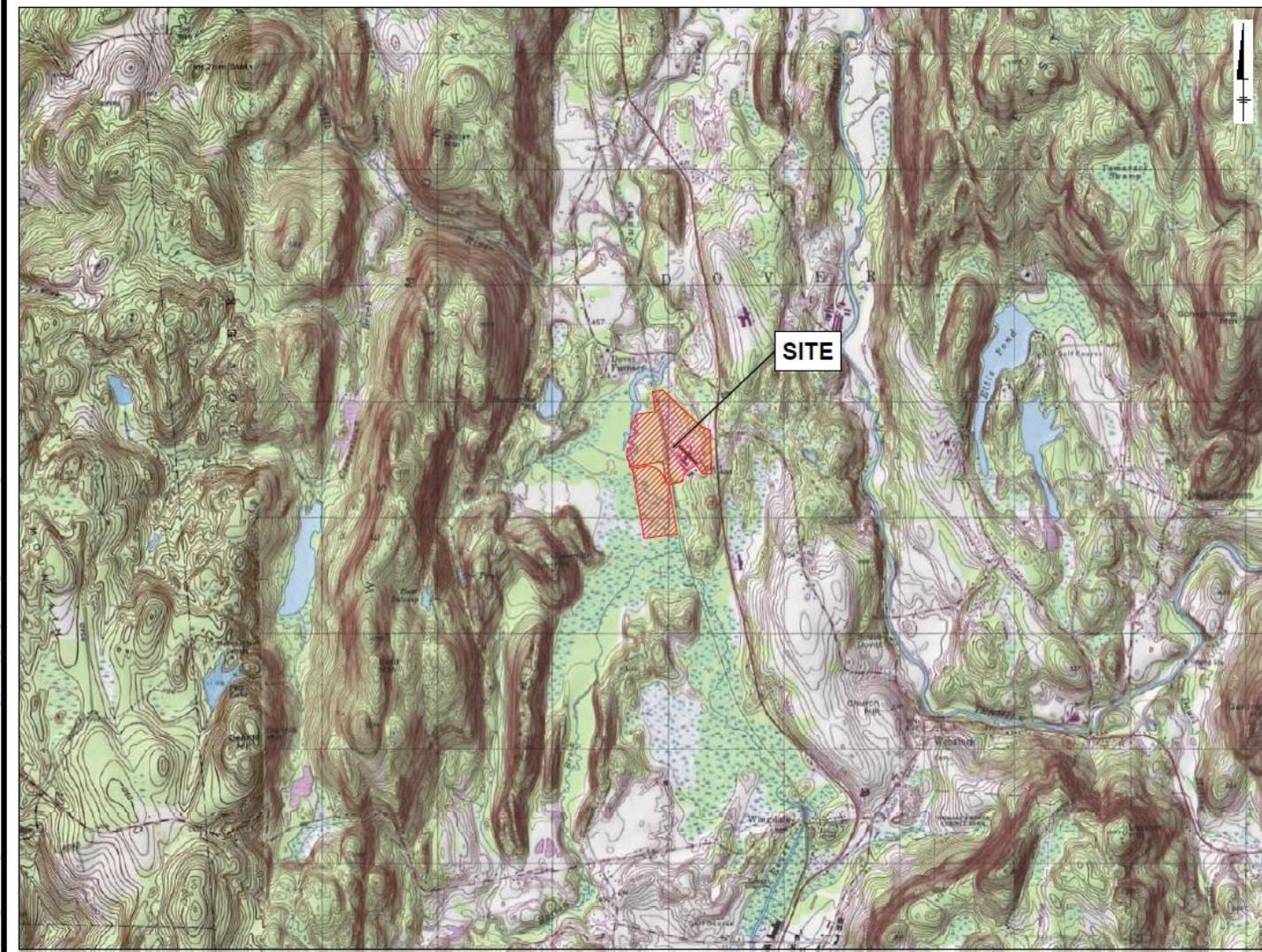
### Follow-up critiques

Follow-up critiques will be discussed in the EH&S meetings to recreate the actions taken and decisions made. The following describes the type of information which should be collected to determine lessons learned:

- Interview those individuals who initially detected the release to determine probable cause.
- Reconstruct the activities that took place during initial deployment of equipment.
- Were there any activities which occurred that should be corrected?
- Describe whether internal and/or external notifications took place without any glitches. Did individuals know their responsibilities?
- Did the communication system function as it is supposed to?
- Were proper notifications made?
- Did the plan help determine who had to be called?
- Were the numbers listed accurate?
- Did the incident command system function appropriately?
- Were there discrepancies on who had responsibility for what function?
- Did staff demonstrate ability to assemble and respond to the incident?
- Were there any decisions made by the Incident Commander that affected how future response actions were implemented or resulted in difficulties for response actions?
- Were there enough personnel to carry out the actions necessary to support the spill operations, including food, sheltering and transportation? Was the ICP functional? Does any information need to be changed?
- Was the response plan implemented in safe manner, or how could the actions be completed in a safer manner?
- Was employee safety or health put at risk and what can be done to reduce that risk?
- What can be done to prevent the unsafe event from re-occurring or reducing the likelihood of the event reoccurring?
- Was training and PPE adequate or are changes needed to improve employee safety and health, or the safety and health of the public?

**Figure 1**

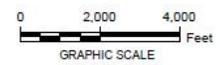
**Site Location Map**



**Legend**

 Site Boundary

SOURCE:  
U.S. Geological Survey, 7.5 x 15  
Minute Quadrangle, Dover Plains,  
NY/CT, Verbank, NY



**CRICKET VALLEY  
ENERGY**

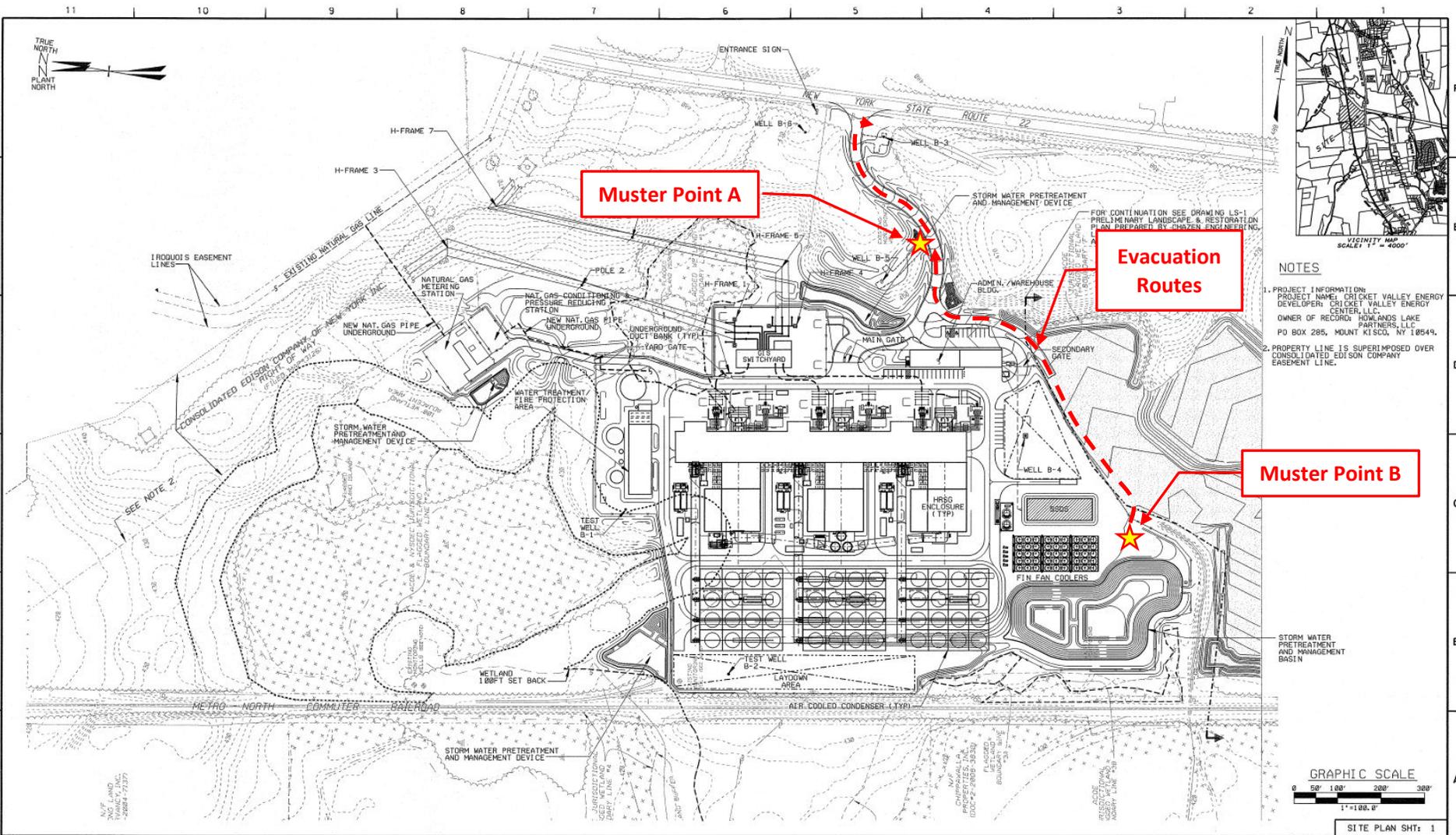
**FIGURE 1  
SITE LOCATION**

**Dutchess County, New York**

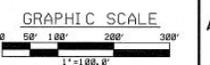
**Figure 2**

**Facility General Layout &**

**Site Evacuation Map (Exits/Rally Points - Muster Areas)**



- NOTES**
- PROJECT INFORMATION:  
 PROJECT NAME: CRICKET VALLEY ENERGY  
 DEVELOPER: CRICKET VALLEY ENERGY CENTER, LLC  
 OWNER OF RECORD: HOWLANDS LAKE PARTNERS, LLC  
 PO BOX 285, MOUNT KISCO, NY 10549.
  - PROPERTY LINE IS SUPERIMPOSED OVER CONSOLIDATED EDISON COMPANY EASEMENT LINE.



SITE PLAN SHT: 1

Rev No	Revision	Date	Des	Drawn	Checked	Approved	Rev No	Revision	Date	Des	Drawn	Checked	Approved	Drawing Control		Engineering Review			Project Information			
S	REVISED SWITCHYARD AND ARRANGEMENT OF TRANSMISSION LINE POLES/FRAMES.	08/14/18	SM				N	ISSUED FOR PERMITTING	10/15/18	JOF				Purpose	Approved	Date	Checked	Date	Drawn	Checked	CRICKET VALLEY ENERGY TOWN OF DOVER DUTCHESS COUNTY, NEW YORK GENERAL ARRANGEMENT PLOT PLAN STUDY BURNS AND ROE ENTERPRISES, INC. Engineers and Constructors - Oradell, NJ New York Certificate of Authorization No. 0006877 Scale: 3000' M200'	
T	REVISED TO INCORPORATE CLIENTS COMMENTS.		JF				P	REVISED TO INCLUDE HRSG AND GENERATOR ENCLOSURES	10/24/18	JFH/JEF				For								
							Q	GENERAL REVISION	08/24/18	ZU				Rev								
							R	ADDED WELLS #66. REVISED SWITCHYARD ARRANGEMENT AND RELICATED TRANSMISSION LINE POLES.	07/22/18	JOF				For								
									10/18/18					Comm								

JOSE E. FERBERO  
 Professional Engineer  
 No. 10824  
 State of New York

Scale: 3000' M200'

18154 06-JUN-2012

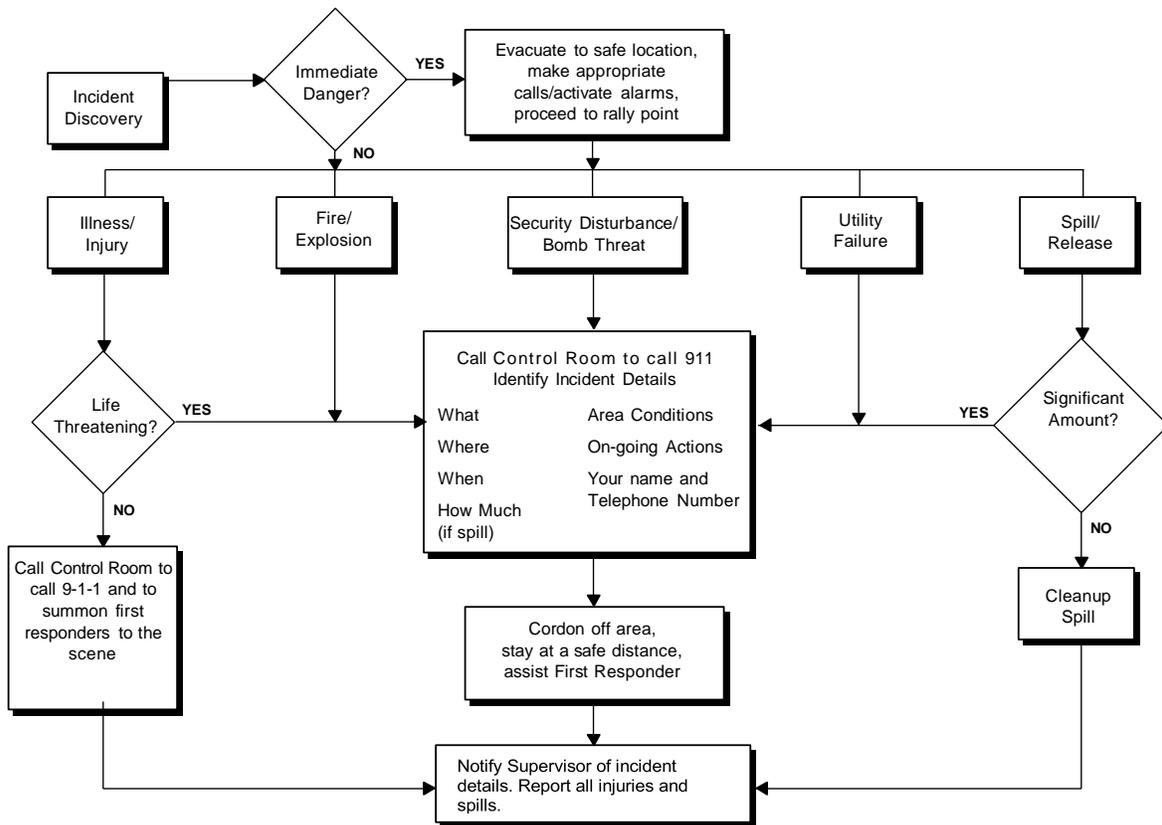
## **Appendices**

### **Emergency Response Procedures**

# INCIDENT DISCOVERY

The objective of this Incident Discovery Procedure is to describe the appropriate response actions to take when an observed or potential incident is initially identified at the Cricket Valley Energy Center (facility). The person detecting an incident can provide immediate action to either facilitate subsequent response actions, or resolve the incident. A flowchart describing these actions is provided below. This procedure shall be followed by all personnel at the facility.

**FIGURE 1**  
**INCIDENT DISCOVERY AND INITIAL INTERNAL REPORTING**  
*Cricket Valley*



## INCIDENT DISCOVERY RESPONSE STEPS

1. If the incident presents an immediate danger (threat of explosion, fire, vapor hazard), evacuate to a safe location and activate the appropriate alarms or make calls and then proceed to a designated Rally Point, if necessary. Remain in that location until otherwise directed by a First Responder or Incident Commander. The safe place of refuge within the plant is the Control Room and will be used as the command center, assuming that it is determined by the Incident Commander to be clear of hazards.
2. If you detect an observed or potential emergency such as a life-threatening illness/injury; fire/explosion; significant spill/release; security disturbance/bomb threat; utility failure; and/or anhydrous ammonia release at the facility, call the Control Room.
3. If illness/injury is not life-threatening, call the Control Room
4. If the nature of the incident is such that it is safe to take action and it is within your normal job responsibilities, initiate appropriate responses to contain the incident. Such actions are typically defensive or limited in nature, and may include:
  - Closing valves to isolate a process or stop a leak, or securing or isolating the operating system (to be undertaken by trained operators).
  - Containing and/or isolating a limited spill/release that is routine relative to your normal job responsibilities and is not considered being a significant amount. Containment measures may include the placement of absorbent materials on and/or around the release, and blocking of floor drains or catch basins
  - Cordoning off the area until appropriate response actions occur.
  - Providing support within your capabilities to response personnel at the scene of the incident, as requested.
5. Provide the Control Room with, at a minimum, the following incident details Control Room to record on the attached form at the end of this section.
  - What?
  - Where?
  - When?
  - How much (if spill/release)?

- Area conditions
- Ongoing actions
- Your name and telephone number

6. After the emergency has been terminated, the person who detected the emergency should participate in debriefing and emergency documentation.

7. Notify supervisor of incident details.

#### **PERSONNEL SPECIFIC DUTIES:**

##### **Any Employee**

- Evacuate to safe location and activate appropriate alarms.
- Call Control Room.
- Initiate appropriate responses to contain the incident.
- Participate in debriefing.
- Notify supervisor of incident details.

##### **Control Room**

- Notify appropriate resources.

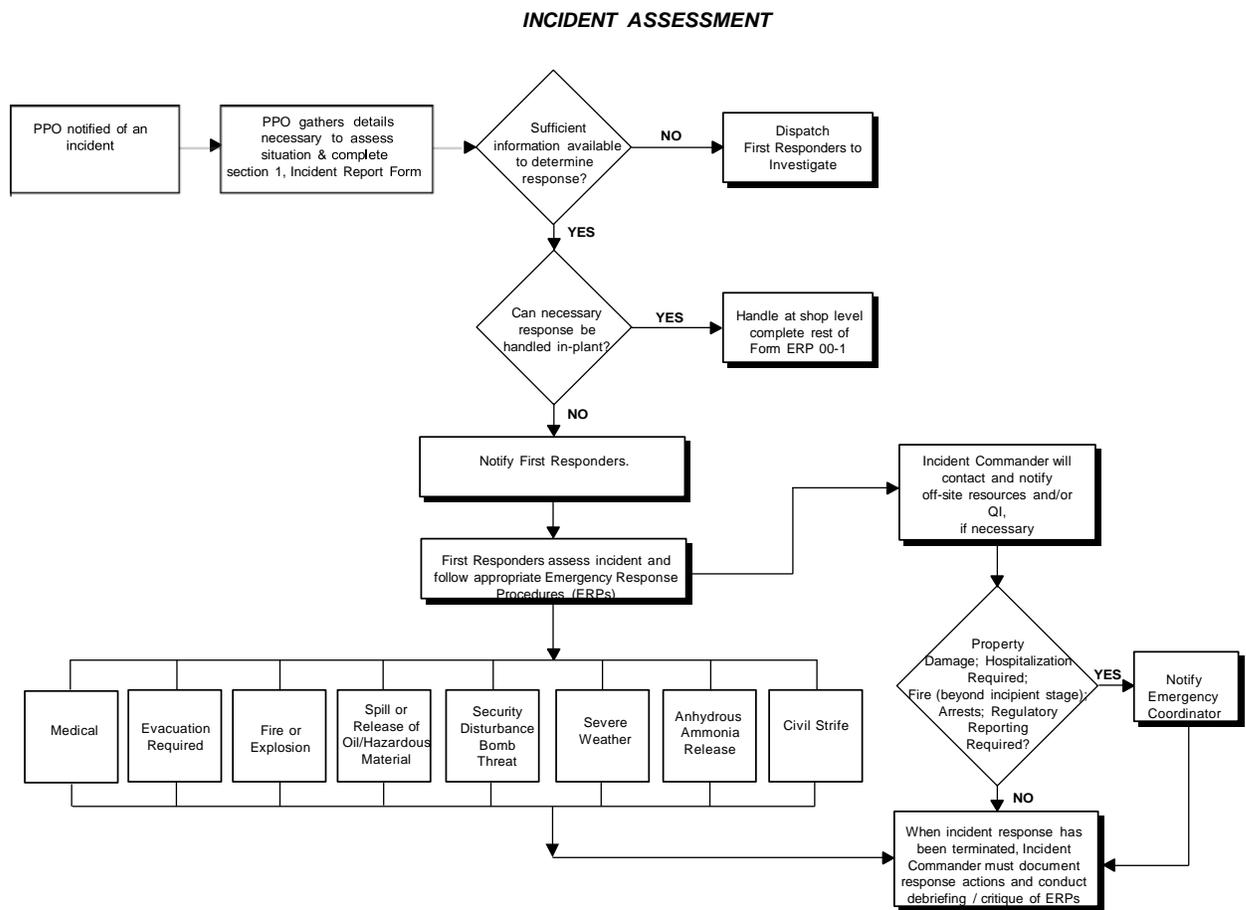
##### **First Responders**

- Respond to incident discovery to make an assessment and establish a plan to address the incident.

# INCIDENT ASSESSMENT

The objective of this Incident Assessment Procedure is to identify the appropriate response actions to take when first responding to an incident or potential emergency at the facility. A flowchart describing these actions is provided below.

The Control Room and Responder(s) will maintain and complete an Incident Response Form throughout and at the completion of all incidents/emergencies reported to the CONTROL ROOM.



## INCIDENT DISCOVERY RESPONSE STEPS

1. If the incident presents an immediate danger (threat of explosion, fire, vapor hazard), evacuate to a safe location and activate the appropriate alarms or make calls and then proceed to a designated Rally Point, if necessary. Remain in that location until otherwise directed by a First Responder or Incident Commander. The safe place of refuge within the plant is the Control Room and will be used as the command center, assuming that it is determined by the Incident Commander to be clear of hazards.
2. If you detect an observed or potential emergency such as a life-threatening illness/injury; fire/explosion; significant spill/release; security disturbance/bomb threat; utility failure; and/or anhydrous ammonia release at the facility, call the Control Room.
3. If illness/injury is not life-threatening, call the Control Room
4. If the nature of the incident is such that it is safe to take action and it is within your normal job responsibilities, initiate appropriate responses to contain the incident. Such actions are typically defensive or limited in nature, and may include:
  - Closing valves to isolate a process or stop a leak, or securing or isolating the operating system (to be undertaken by trained operators).
  - Containing and/or isolating a limited spill/release that is routine relative to your normal job responsibilities and is not considered being significant amount. Containment measures may include the placement of absorbent materials on and/or around the release, and blocking of floor drains or catch basins
  - Cordoning off the area until appropriate response actions occur.
  - Providing support within your capabilities to response personnel at the scene of the incident, as requested.
5. Provide the Control Room with, at a minimum, the following incident details Control Room to record on the attached form at the end of this section.
  - What
  - Where
  - When
  - How much (if spill/release)

- Area conditions
- Ongoing actions
- Your name and telephone number

6. After the emergency has been terminated, the person who detected the emergency should participate in debriefing and emergency documentation.

7. Notify supervisor of incident details.

## **PERSONNEL SPECIFIC DUTIES**

### **Any Employee**

- Evacuate to safe location and activate appropriate alarms.
- Call Control Room.
- Initiate appropriate responses to contain the incident.
- Participate in debriefing.
- Notify supervisor of incident details.

### **Control Room**

- Notify appropriate resources.

### **First Responders**

- Respond to incident discovery to make an assessment and establish a plan to address the incident.

## **MEDICAL EMERGENCY PROCEDURE**

The objective of this Emergency Response Procedure is to identify the appropriate actions to take when a medical emergency occurs.

1. If you detect a medical emergency at the facility, call the CONTROL ROOM. Give specific directions to the location of the victim(s). Provide the CONTROL ROOM with sufficient information to determine what response actions and resources are necessary.
2. If it is safe to do so, provide comfort and support to the victim(s) and wait near the scene to assist or direct other responders to the scene, unless otherwise directed to wait in another safe location or to evacuate to a Rally Point.

**All employees providing such assistance should be aware that they could be at risk of acquiring an infectious or communicable disease. They must take precautions when in contact with the victim's body fluids (blood, urine, secretions), and take protective measures during clean up and disposal of material used to treat the victim.**

3. The CONTROL ROOM dispatches the First Responders to the scene.
4. The CONTROL ROOM shall call 911 and provide sufficient information for the appropriate resources to be sent to the site. The CONTROL ROOM shall monitor the facility gate to direct off-site resources to the location of the incident. If available, site personnel shall proceed to the gate to escort Off-site emergency responders to the scene.
5. Upon arrival at the scene, the First Responders should not rush into the situation. Instead, they should perform a hazard evaluation to determine the appropriate level of protection for medical and/or emergency responders. First Responders should not enter an area considered to contain hazards (potential or actual release) without first discussing with the Incident Commander. A typical hazard evaluation would include the following questions:
  - Has a release occurred that may require air monitoring for First Responders to identify concentrations of toxic gases or oxygen deficient atmospheres?
  - Is the injury a result of an exposure to some chemical, gas or fumes that may still be present?
  - Is the injury a result of a mechanical or electrical hazard? Is this hazard (e.g. live wires) still present?
  - Is the injury a result of a personal medical condition or other medical emergency, such as cardiac arrest?

6. Once the first responders (who are also trained in first aid and CPR) have properly evaluated the situation and the appropriate safety measures have been taken, the first responder will evaluate the victim's condition and treat and/or stabilize the injury/illness.
7. If the injury/illness is a result of a hazardous substance spill or exposure, the Responder(s) should implement Spill Procedures, to secure the area and make it safe for medical and rescue personnel. The area should be cordoned off, and areas should be designated for command staff, support, decontamination and hot zones. If necessary, the affected areas may be evacuated with the assistance of Plant Personnel.
- 8a. If the cleanup of blood or body fluids is required, it shall be done by trained personnel only and the CONTROL ROOM shall notify the off-site hazardous waste contractor, if necessary.
- 8b. If a fatality or the hospitalization of three or more persons occurs, the CONTROL ROOM must notify the Emergency Coordinator (EC). The EC will coordinate the reporting of any fatality to OSHA within 8 hours of knowledge of the fatality. The EC will coordinate reporting of any hospitalization of three or more people within 30 days of the incident to OSHA within 8 hours of knowledge of the hospitalization.
9. The CONTROL ROOM or other responder to the scene shall complete an incident and deliver to EH&S and facility manager.
10. After the incident/emergency has been terminated, the Incident Commander shall conduct debriefing/critique of ERPs and document response actions.

#### **PERSONNEL SPECIFIC DUTIES:**

##### **(CONTROL ROOM)**

- Call (external 911).
- Notify off-site hazardous waste coordinator when cleanup of blood or body fluids is required.
- Serve as communications coordinator, log all communications.
- Notify additional resources as directed by Incident Commander.
- Notify Emergency Coordinator if fatality and/or hospitalization of three or more persons occurs.
- Notify First Responders.
- Serve as Incident Commander until relieved.

##### **First Responder**

- Perform hazard evaluation.
- Evaluate victim's condition and treat and/or stabilize the injury/illness.
- Assist fire department or outside ambulance service, transition care.
- Assess the need for additional resources.
- Assess the need for clean-up of blood borne pathogens. If trained to do so, initiate clean-up, if not trained to do so, contact off-site hazardous waste contractor.
- Complete initial incident report.

#### **Fire Department**

- In the event that an emergency expands beyond the capability of plant personnel, the fire department or contract ambulance service personnel will perform any further required emergency medical care, as necessary.

#### **Environmental Health and Safety**

- First Responders patrol the area at a safe distance for additional safety and environmental hazards.
- Serve as Incident Commander, if necessary.
- Make regulatory notifications as directed by the Emergency Coordinator.
- Follow up on injury, complete incident reports, make internal notifications, and implement corrective actions.

#### **Off-Site Hazardous Waste Contractor**

- Perform cleanup of any blood and/or body fluids.

#### **Emergency Coordinator**

- Request CONTROL ROOM to notify Qualified Individual, if necessary.
- Serve as Incident Commander, if necessary.
- Direct regulatory notifications.

#### **Incident Commander**

- Activate Emergency Response Organization (ERO), if necessary.
- Coordinate Responders.
- Request CONTROL ROOM to make notifications for additional resources.
- Document response

## **EMERGENCY EVACUATION PROCEDURE**

The objective of this Emergency Evacuation Procedure is to identify the appropriate actions to take to evacuate in a safe and orderly fashion from the scene of an incident that presents immediate danger to the health and safety of employees (i.e., threat of explosion, fire, vapor hazard).

1. If you detect a situation that may require evacuation, call the Control Room by calling the control room. All employees have been instructed to pull the fire alarm and call the control room (internal), if safe to do so, in any event that may require emergency evacuation.
2. If the incident presents an immediate danger, the CONTROL ROOM shall dispatch the First Responders to the scene, and the Control Room shall assign available staff to meet the incoming resources at the facility gate and direct them to the scene. The CONTROL ROOM then calls fire department and provides sufficient information for the appropriate resources to be sent to the site.
3. The CONTROL ROOM shall call the EHS Responder.
4. The Responder(s) shall determine if hazards could affect evacuation routes and identify appropriate rally points. The Responder(s) must also evaluate the need for evacuation of downwind facility areas and off-site areas. Rally points are identified on evacuation route drawings posted in all buildings.
  - 5a. An emergency evacuation will be signaled with an audible sound and visible strobe alarm. All employees must react immediately. Additionally, there are voice prompts that must be adhered to. These voice prompts directs employees away from the hazards and towards a safe refuge.
  - 5b. At the sound of an alarm, employees should secure all work and proceed in an orderly fashion (quickly and quietly; do not run) out the nearest safe exit as shown on the maps of recommended evacuation routes and as directed by voice prompts over the alarm system. Operators should ensure that all equipment is in safe condition prior to evacuation, if conditions allow.
  - 5c. Assist any handicapped personnel in the area.

- 5d. Leave the building and go to the primary rally point areas.
- 5e. Go to an alternate rally point if the pathway to the primary rally point is obstructed, the primary rally point is unsafe or you are instructed to go elsewhere by emergency personnel or by voice prompts through the alarm system.
- 5f. Stay in the rally point until a head count is completed by the designated headcounter for your work area.
- 5g. After the head count is completed, the Incident Commander will evaluate the need for personnel searches and/or rescues, and notify the Responder(s) if one is necessary.
- 5h. All personnel searches and/or rescues shall be conducted by fire department.
- 5i. Personnel shall not re-enter the evacuated area until the “all clear” announcement/signal is made by the Incident Commander.
6. The EHS Responder will evaluate the incident (at a safe distance) for other potential safety or environmental hazards.
7. The Incident Commander shall request the CONTROL ROOM to notify the Emergency Coordinator (EC).
8. After the incident is isolated, the Responder(s) will meet to discuss if the incident is resolved and the emergency secured. If agreement is reached, the Incident Commander will make the “all clear” announcement.
9. After the incident/emergency has been terminated, the Incident Commander will conduct a debriefing/critique of the Emergency Evacuation ERP.

**PERSONNEL SPECIFIC DUTIES:**

**Control Room**

- Serve as communications coordinator, log all communications.
- Notify additional resources as directed by the Incident Commander.

- Notify the Emergency Coordinator in cases of property damage, fire (beyond incipient), hospitalization required, and regulatory reporting required, as directed by the Incident Commander.
- Call fire department if incident presents immediate danger.
- Notify the First Responders.
- Serve as Incident Commander until relieved.

### **First Responders**

- Respond to all real and potential emergencies as directed by the CONTROL ROOM.
- Provide communications between rally point leaders and Incident Commander.
- Provide traffic and crowd control. Direct emergency vehicles.
- Assist in keeping people away from the evacuated area until the all clear signal is given by the Incident Commander.
- Assist with evacuation.
- Provide security.
- Perform hazard evaluation.
- Coordinate/assist with other Responders.
- Perform hazard evaluation.
- Report to the location of the emergency as reported by the CONTROL ROOM, or respond directly to the area of an alarm device.
- Conduct evacuation.
- Proceed to extinguish incipient stage fires.
- Assist in keeping people away from the evacuated area until the all clear signal is given by the Incident Commander.
- Indicate the “all-clear” for employee re-entry to the Incident Commander for incipient stage fires that have been extinguished and are not under the control of the fire department.
- Coordinate with/assist other Responders.
- Serve as Incident Commander of the First Responder group.
- Provide assistance with utility shut off and control.
- Assign personnel to proceed to gate to direct Responders to scene.
- Assist in keeping people away from the evacuated area until the all clear signal is given by the Incident Commander.
- Arrange for conducting drills.
- Communicate with Control Room.
- Responsible for leading critique.
- Tour their common areas and check restrooms, conference rooms, and other general work areas. Notify occupants of the alarm and instruct them to evacuate.

- Alert contractors, visitors, and other transients of the meaning of the alarm (get out) and the location of the rally point.
- If a person refuses to exit, do not attempt to coerce the person. Notify Incident Commander of recalcitrant person at rally point.
- Check other potentially occupied areas within the scope of their pre-assigned areas including the roof, transformer rooms, confined spaces, etc.

#### **Environmental Health and Safety**

- EHS Responder and other EHS personnel patrol the area at a safe distance to identify additional safety and environmental hazards.
- Provide feedback to First Responders on necessity of further evacuation needs.
- Assist in keeping people away from the evacuated area until the all clear signal is given by the Incident Commander.

#### **Emergency Coordinator**

- Coordinate with other Responder(s).
- Make “all clear” announcement.

#### **Fire Department**

- In the event that an emergency expands beyond the capability of plant personnel, the fire department is the primary responding agency.
- The fire department will perform any required search and rescue.
- Provide “all clear” announcement to Incident Commander when re-entry into evacuated areas is possible.

## **FIRE AND/OR EXPLOSION PROCEDURE**

The objective of this Emergency Response Procedure is to identify the appropriate actions to take in the event of a fire or explosion at the facility.

1. If you observe a fire and/or explosion at the facility, call the Control Room by dialing the control room or pull the nearest fire alarm. Give specific directions to the area affected by the fire or explosion. Provide the CONTROL ROOM with sufficient information to determine what response actions and resources are necessary.
- 2a. If a fire or explosion is ongoing, the CONTROL ROOM shall immediately call external 911 (fire department) and provide the dispatcher with the following information, if possible:
  - location of fire,
  - number of buildings involved,
  - time fire started or explosion occurred,
  - number of employees working in the affected building(s),
  - what chemicals may be burning or stored in the building(s), and
  - any other pertinent information.
- 2b. The CONTROL ROOM shall then notify and direct the First Responders to the scene. Depending on the severity of the fire or explosion, the Responder(s) should wait at a safe distance to direct other responders or implement evacuation of the area, if necessary.
- 2c. The CONTROL ROOM shall monitor the gates to direct any emergency vehicles to the scene. If possible, a plant employee will be at the gates and shall provide the fire department with the pre-incident planning form information for the building(s) where the fire/explosion is occurring. The Incident Commander will assign personnel to proceed to the gate to escort responders to the scene.
- 3a. The first responders shall evaluate the fire/explosion to determine:
  - Location
  - Material burning
  - Potential spread/exposures
  - Fire protection systems activated
  - Employee evacuation on-going or required
  - Other potential safety/environmental hazards.

The evaluation information can be relayed by the First Responders either upon the fire department arrival on-scene or through direct radio communication with incoming fire department apparatus.

- 3b. If Responder(s) determine that the fire is already extinguished or will be extinguished immediately using on-site resources (incipient stage fires only), the Incident Commander can cancel fire department prior to its arrival.
- 3c. If the potential for encounter with smoke or an Immediate Dangerous to Life and Health (IDLH) atmosphere exists, prior to entry, the First Responders and plant personnel may don self-contained breathing apparatus (SCBA). SCBA shall only be worn by personnel trained and medically cleared for its use. Upon encountering smoke or a potential IDLH environment, First Responders and plant personnel shall immediately activate their SCBA unit and exit the area. The First Responders and plant personnel shall not use SCBA for any firefighting or search and rescue purposes, but rather solely for respiratory protection during egress. In addition, the First Responders shall not enter a building where an existing IDLH atmosphere is present except within the provisions of paragraph 6, below. All firefighting beyond the incipient stage, and all personnel search and rescue shall be performed by the fire department.
4. Responder(s) shall ensure that any affected electrical systems are shut down along with any affected operations, if it is safe to do so.
5. The CONTROL ROOM will notify the First Responder and the Emergency Coordinator (EC), of the arrival of the fire department. The First Responder and/or EC will report to the scene, if necessary, and coordinate with the fire department in establishing an on-scene mobile command post to direct fire or explosion responders, and activate the Emergency Operations Center (EOC). They will direct individuals to assemble at the command post or EOC to help coordinate response efforts, verify that the appropriate fire or explosion response personnel have responded to the incident, and call the CONTROL ROOM to obtain additional back-up, if necessary.
6. All First Responders will assist the fire department as necessary and as directed (if the activities can be conducted in a safe manner) by the Incident Commander
  - Connections to water sources.
  - Identification of materials involved.
  - Use of proper personal protective clothing.

- Identification and manning of fixed fire suppression equipment for manual operation.
  - Isolation of electrical systems.
7. Responders will identify any hazardous substances that may have been involved in the fire or explosion. MSDS may be obtained from the electronic database, or if necessary and safely obtainable, hard copies in the control room respectively). Responders shall also refer to the U.S. Department of Transportation Guidebook for First Response to Hazardous Materials Incidents for Emergency Actions for Small and Large Fires. The Responder(s) shall implement the facility spill pollution response plan, as needed, to address a spill of oil or hazardous material associated with the fire or to initiate cleanup activities.
  8. The Responder(s) will evaluate the need for medical services, perform rescue operations and evacuate nearby buildings. Refer to the medical procedures and evacuation procedures.
  9. The Incident Commander will assess actions needed to mitigate on-site and off-site impacts and environmental impacts.
  10. The Incident Commander will determine when the emergency is over and provide the “all clear” announcement.
  11. After the emergency has been terminated, the Incident Commander shall coordinate a debriefing and emergency documentation. Other activities to be considered/conducted following termination of the incident shall include:
    - Briefing Public Relations so that all questions can be directed to them.
    - Fire Inspectors will replace sprinkler heads, reopen control valves and replace/refill discharged fire extinguishers.
    - Forming a team to clean up the property to get the affected area back in operation.
    - Conducting a debriefing/critique of the Fire/Explosion ERP.
    - Conducting an incident investigation

**PERSONNEL SPECIFIC DUTIES:**

**Control Room**

- Serve as Incident Commander until relieved.
- Serve as communications coordinator, log all communications.
- Notify additional resources as directed by the Incident Commander.
- Call fire department if incident presents immediate danger.

- Notify First Responders.
- Notify EHS Responder when off-site resources are notified.
- Notify Emergency Coordinator.

### **First Responders**

- Respond to all real and potential emergencies as directed by the CONTROL ROOM.
- Provide traffic and crowd control. Direct emergency vehicles.
- Provide security.
- Assist with evacuation.
- Perform hazard evaluation.
- Coordinate/assist with other Responders.
- Report to the location of the emergency as reported by the CONTROL ROOM, or respond directly to the area of an alarm device.
- Evaluate fire/explosion. If smoke or potential IDLH, evacuate immediately.
- Conduct evacuation, if necessary.
- Perform hazard evaluation.
- Proceed to extinguish incipient stage fires.
- Coordinate with/assist other Responders.
- Indicate the “all-clear” for employee re-entry to the Incident Commander for incipient stage fires that have been extinguished and are not under the control of the fire department.
- Respond to the scene.
- Coordinate with/assist other Responders.
- Serve as the Incident Commander of First Responders.
- Provide assistance with utility shut off and control.
- Assign personnel to proceed to gate to direct Responders to scene.

### **Environmental Health and Safety**

- EHS Responder and other EHS personnel patrol the area at a safe distance for additional safety and environmental hazards.
- Serve as the Incident Commander, if necessary.
- Make regulatory notifications as directed by the Emergency Coordinator.

### **Fire Department**

- The fire department is the primary responding agency to incidents of fire or explosion, with exception of incipient fires extinguished by plant personnel.
- Perform any required search and rescue.
- Provide “all clear” announcement to the Incident Commander when re-entry into evacuated areas is possible.

**Emergency Coordinator**

- Activate Emergency Response Organization (ERO), if necessary.
- Serve as the Incident Commander, if necessary.
- Request CONTROL ROOM to notify Qualified Individual, if necessary.
- Direct regulatory notifications.

**Incident Commander**

- Coordinate Responders.
- Request CONTROL ROOM to make notifications for additional resources.
- Make the “all clear” announcement.
- Document response actions and conduct debriefing critique of ERP.

## **SPILL/RELEASE PROCEDURE**

Significant spillage of certain types of materials that are at the facility may need to be reported to agencies such as New York State Department of Environmental Conservation (NYSDEC), Environmental Protection Agency (EPA), etc. Substantial fines can result from improper or unauthorized handling of spills, as well as from not reporting them to the proper agencies.

The objective of this Emergency Response Procedure is to identify the appropriate actions to take when a spill or release of oil, hazardous materials or other potentially harmful substances (i.e., sanitary waste, blood, etc.) occurs at the facility. The intent is to minimize the health, safety and environmental impacts from a discharge of fuel, lubricating oil, or hazardous material from the facility and to prevent discharge(s) from leaving the site, especially to the facility storm drains and the nearby wetlands. Response activities will be completed only when it is determined to be safe to do so.

A spill is defined as a release of a material from outside its normal container. Spilled materials can be liquid, solid, or gas in nature. Because fires also release chemicals (smoke, fumes, etc.), they fall into the definition of a spill and therefore, also need to be reported internally. Releases into spill containment areas (dikes, separators, etc.) are still considered spills, must be reported internally, and may need to be reported to governmental agencies depending upon the type and quantity of material released.

### 1. If you detect a spill at the facility:

- Immediately call the Control Room. Provide information regarding the nature and extent of the spill so that the Control Room can initiate appropriate response activities.

This information shall include:

- Type of chemical spilled;
  - Location of the spill;
  - Approximate volume of the spill;
  - Number of injured employees; and
  - If possible, a copy of the MSDS for the spilled chemical.
- 
- Determine if the spill is significant by comparing the estimated amount and type of material spilled with the facility's significant spill quantity information. If the material spilled is not identified, assume that the incident is a significant spill.
  - If the spill is not significant, operations must clean up the spill immediately. For non-significant spill cleanup procedures, refer to the MSDS or contact the EHS Coordinator. Notify your supervisor and/or Plant EHS Coordinator following clean up.

2. If you detect a spill that is in progress, initiate actions to stop or control the spill, if it is safe to do so and you are adequately trained and authorized to do so. Your supervisor should be informed of the spill as soon as conditions permit.
3. Based on the information provided, the CONTROL ROOM will notify the First Responders and direct them to the scene. The CONTROL ROOM may also notify additional response personnel, including the emergency coordinator (for significant spills), fire department (in case of fire/explosion, the waste contractor, and/or off-site resources as directed by the Incident Commander.
- 4a. Upon arrival at the scene, the Responder(s) shall assess the spill event and secure access to the affected area. Depending on the type or quantity spilled, the product may be toxic if ingested, or it may be a skin or eye irritant. Product vapor may be an eye or respiratory irritant, and may produce headaches or nausea if concentrated. Vapors may be flammable or explosive. Material Safety Data Sheets for each product (available from the electronic database or in hardcopy format in control room and will give specific information on these matters.
- 4b. The Responder(s) will determine if any injuries are involved, and if so, will implement or direct someone else to implement the Medical Emergency Procedure.
- 4c. The Responder(s) will determine if evacuation is necessary, and if so, will implement or direct someone to implement the Evacuation Procedure.
- 4d. The Responder(s) will determine if a fire/explosion hazard exists, and if so, will implement or direct someone to implement the Fire/Explosion.
5. The Responder(s) should cordon off and secure the spill area, at a safe distance and should arrange to have any potentially affected storm drains/manholes covered immediately and secure any affected operating equipment and possible ignition sources or other hazards.
6. The Incident Commander should designate support, decontamination and hot zones as necessary.
7. If the release has impacted or may potentially impact the surrounding wetlands, the Responder(s), under the direction of the Incident Commander, should secure access to the affected area, which may include:
  - request the CONTROL ROOM to notify the EHS Responder;

- securing skimmers and/or booms near plant discharges on or near affected portions of the wetlands.

## 8. SPILL RESPONSE PROCEDURES FOR SPECIFIC SPILL SCENARIOS

Under supervision or direction of the Incident Commander, employees shall respond in accordance with their training and abilities to the following spill/release scenarios.

### **Transfer Equipment Failure:**

In the event of transfer equipment failure, not necessarily resulting in a spill, the following procedures shall be executed:

- Secure operations with the affected equipment.
- Isolate the transfer equipment from the rest of the system.
- Place containers and sorbent materials to effectively contain spilled product.
- Attempt to prevent product from entering storm drains.
- Determine the cause of failure if possible.
- Notify appropriate facility personnel.

### **Tank Overfill:**

Fuel or lubricating oil storage tanks are located inside secondary containment. In the event of a tank overfill the following procedures shall be executed:

- Secure transfer operations.
- Secure vent valve.
- Place containers and sorbent materials to effectively contain and recover spilled product.
- Place recovered product into waste storage tank.
- Notify appropriate facility personnel.
- Notify the EHS Responder & Qualified Individual.

### **Tank Failure:**

A catastrophic tank failure may require the assistance of external resources immediately. Although the fuel and lubricating oil storage tanks are protected within secondary containment, considerable splash over may result in a release of product into the adjacent waterway or storm

drains. Additionally, a potential may exist for a major fire and/or explosion. Because of the gravity of the situation the following procedures need to be implemented immediately:

- DO NOT ENTER THE CONTAINMENT AREA.
- Secure all fueling operations.
- Secure all valves outside the containment area.
- Notify appropriate facility maintenance personnel.
- Keep all unnecessary personnel out of the immediate area.
- Notify the EHS Responder & Qualified Individual.
- Notify off-site response contractor

#### **Piping Rupture:**

In the event of a piping rupture the following procedures shall be executed:

- Secure all transfer operations on the affected system.
- Isolate the affected section of pipe by closing valves on both sides of the line.
- Place containers and sorbent materials to effectively contain and recover spilled product.
- Place containment boom around affected area.
- Attempt to prevent product from entering storm drains.
- Notify appropriate facility maintenance personnel.
- Notify the EHS Responder & Qualified Individual

#### **Piping Leak:**

In the event of a piping leak the following procedures shall be executed:

- Secure transfer operations on the affected system.
- Place containers and sorbent materials to effectively contain and recover spilled product.
- Attempt to prevent product from entering storm drains.
- Notify appropriate facility maintenance personnel.
- Notify the EHS Responder & Qualified Individual.

#### **Explosion and/or Fire:**

In the event of explosion or fire the following procedures shall be executed:

- DO NOT ENTER THE BURNING AREA.

- Secure all fueling operations.
- Secure all valves that are accessible.
- Notify appropriate facility personnel.
- Evacuate all personnel from the immediate area.

#### **Pump Failure:**

In the event of a pump failure result in a release, the following procedures shall be executed:

- Secure fuel transfer operations on the affected system.
- Isolate the pump from the storage tank.
- Drain the product from the pump and discharge line into an approved container.
- Place sorbent materials around the pump in preparation for removal by facility maintenance personnel.
- Attempt to prevent product from entering storm drains.
- Place blank flanges or caps on the exposed pipe ends after pump removal.

#### **Relief Valve Failure:**

In the event of a relief valve failure the following procedures shall be executed:

- Secure the pump.
- Isolate the relief valve from the system by closing valves on either side of the affected component, if possible.
- If the affected system has a bypass feature, align the system for bypass and
- drain the affected piping into a suitable container.
- Place sorbent material strategically around potential leak areas to contain escaping product.
- Notify appropriate facility personnel.

9. If a potential Reportable Quantity (RQ) has been released, the Incident Commander will request the CONTROL ROOM to notify the EHS Coordinator to assist in the evaluation of the spill/release to determine whether the release potentially triggers any reporting criteria.

10. If the spill/ release involves/results in property damage, fire (beyond incipient stage), hospitalization, and/or regulatory reporting requirements (i.e., all releases to wetlands and other specific volumes of certain materials to the environment) and/or additional off-site

resources are required to contain/remediate the spill/release, the Incident Commander shall request the CONTROL ROOM to notify the Emergency Coordinator.

11. Following the completion of spill response activities, the Incident Commander should contact the EH&S Coordinator to arrange for the storage and disposal of waste generated during spill response. Types of solid materials that may need to be disposed of include sorbent pads, protective clothing, and soil impacted by the release. Liquids would include water, oil, and chemicals recovered as part of the spill response activity, as well as fluids used for decontamination processes.

Soils that are excavated must be transported to a secure location at the designated soil stockpile area, where they must be segregated, placed on plastic sheeting, covered, and labeled pending characterization and disposal. Other solid waste, slurry, sediment, and liquid waste must be containerized in drums or tanks and labeled with sufficient information to enable subsequent tracking and disposal. The EHS department must be notified of the quantities, nature, and date of generation of all waste products, and is responsible for arranging for classification and recycling, re-use, or disposal in accordance with State and Federal regulations and existing facility permits.

12. After the spill/release incident has been stabilized or remediated, the Incident Commander shall conduct a debriefing/critique of the spill/release ERP.

## **PERSONNEL SPECIFIC DUTIES**

### **Control Room**

- Incident Commander until relieved.
- Serve as communications coordinator, log all communications.
- Notify additional resources as directed by the Incident Commander.
- Notify First Responders & Qualified Individual.
- Notify Emergency Coordinator in cases of property damage, fire (beyond incipient), hospitalization required, and regulatory reporting required, as directed by the Incident commander.

### **First Responders**

- Report to the location of the emergency as reported by the CONTROL ROOM, or respond directly to the area of an alarm device.

- Conduct evacuation, if necessary.
- Proceed to extinguish incipient stage fires.
- Coordinate/assist other Responders.
- Indicate the “all-clear” for employee re-entry to the Incident Commander for incipient stage fires that have been extinguished and are not under the control of the fire department.
- Perform hazard evaluation.
- Assist other Responders in conducting defensive spill response measures.

### **Environmental Health and Safety**

- Designate support, decontamination and hot zones.
- Direct responses to significant spills.
- Determine if release triggers any reporting criteria.
- Serve as the Incident Commander/Qualified Individual, if necessary.
- Conduct any regulatory notifications as directed by the Emergency Coordinator.
- EHS Responder and other EHS personnel patrol the area at a safe distance for additional safety and environmental hazards.
- Direct storage and disposal of waste generated during spill response activities.

### **Fire Department**

- In the event that an emergency expands beyond the capability of plant personnel, the fire department is the primary responding agency.
- Fire department will perform any required search and rescue.
- Provide “all clear” announcement to the Incident Commander when re-entry into evacuated areas is possible.

### **Emergency Coordinator**

- Designate support, decontamination and hot zones.
- Direct responses to significant spills, as appropriate.
- Serve as the Incident Commander, if necessary.
- Direct or make regulatory notifications.

### **Incident Commander**

- Coordinate Responders.
- Request CONTROL ROOM to make notifications for additional resources.
- Document response actions and conduct debriefing/critique of ERP.
- Provide the “all clear” announcement.

## **SECURITY DISTURBANCE, BOMB THREAT PROCEDURE and, SUSPICIOUS MAIL/PACKAGES**

The objective of this procedure is to identify the appropriate actions to take in the event of a security disturbance, bomb threat or suspicious mail/packages.

- 1a. If you receive a bomb threat, remain calm and courteous. Listen to the caller; do not interrupt the caller. Note the exact message stated by the caller. Note the exact time and date the call was received.
  
- 1b. Complete the attached Bomb Threat Operator Checklist (attached below)
  
2. Suspicious mail and or package instructions (see attached below)
  
3. For all security disturbances, bomb threats, and suspicious mail/packages:
  - Notify the Control Room.
  - The CONTROL ROOM will contact the Facility Manager and the Emergency Coordinator (EC). The CONTROL ROOM will also notify the First Responders.
  - The EH&S Manager will determine if the threat is perceived as genuine and a possible actual threat exists. The EH&S Manager will contact local and state police and the state police bomb squad, if necessary.
  - The Incident Commander will activate ERP-03, Emergency Evacuation Procedure, if necessary.
  - The EC will request the CONTROL ROOM to notify the Qualified Individual (QI), who will contact the Facility Manager and if necessary the customer's representative.
  - Local Police will address any security disturbance with assistance from outside resources, if necessary. First Responders will provide assistance to outside resources conducting bomb searches, but shall not directly participate in the search.
  - The Incident Commander will give an "all clear"; based on input from the local police, fire department, and any other outside agencies responding to the incident.
  - After the incident is determined to be over, the Incident Commander shall conduct a debriefing/critique.

*Bomb Threat- Operator Checklist*

**CALLER CHARACTERISTICS**

**CALLER'S VOICE  
SPEECH**

Male: \_\_\_\_\_ Female: \_\_\_\_\_  
Approx Age: \_\_\_\_\_ Ethnic Group: \_\_\_\_\_

**VOICE CHARACTERISTICS**

Accent: \_\_\_\_\_ Drunk: \_\_\_\_\_  
Lisp: \_\_\_\_\_ Other: \_\_\_\_\_

**MOOD OF CALLER / RATE OF**

Calm: \_\_\_\_\_ Slow: \_\_\_\_\_  
Angry: \_\_\_\_\_ Normal: \_\_\_\_\_  
Excited: \_\_\_\_\_ Rapid: \_\_\_\_\_

**LOUDNESS OF VOICE / ATTITUDE**

Soft: \_\_\_\_\_ Sincere: \_\_\_\_\_  
Normal: \_\_\_\_\_ Disguised: \_\_\_\_\_  
Loud: \_\_\_\_\_ Familiar: \_\_\_\_\_

**BACKGROUND NOISES**

Street Sounds: \_\_\_\_\_ Rail Sounds: \_\_\_\_\_ Plane Sounds: \_\_\_\_\_ Home Sounds: \_\_\_\_\_  
Bar Sounds: \_\_\_\_\_ Music: \_\_\_\_\_ Machines: \_\_\_\_\_ Bedlam: \_\_\_\_\_

**QUESTIONS TO ASK**

1. WHEN WILL THE BOMB EXPLODE ? \_\_\_\_\_
2. WHERE IS THE BOMB ? \_\_\_\_\_
3. WHAT DOES IT LOOK LIKE ? \_\_\_\_\_
4. WHAT KIND OF BOMB IS IT ? \_\_\_\_\_
5. WHAT WILL CAUSE IT TO EXPLODE ? \_\_\_\_\_
6. WHY DID YOU PLACE THE BOMB ? \_\_\_\_\_
7. WHAT IS YOUR NAME ? \_\_\_\_\_
8. WHAT IS YOUR ADDRESS ? \_\_\_\_\_

**CALL RECORD**

Exact language used: \_\_\_\_\_  
Exact time of call: \_\_\_\_\_ Date of call: \_\_\_\_\_ Number called: \_\_\_\_\_  
Call received by: \_\_\_\_\_ Location: \_\_\_\_\_  
Action taken: \_\_\_\_\_

## Handling of Suspicious Mail

All personnel who handle mail have a responsibility to consistently follow the established safety procedures. One of these procedures is to maintain caution and follow directives when dealing with suspicious mail in terms of explosives and biochemical threats. The goal of this procedure is to provide the steps that you must follow in order to protect yourself and all other personnel in the facility. We must be ready to act in the event any of us come across a piece of suspicious mail. **Be aware that explosive or biohazard material can be enclosed in either a package or an envelope.**

### **What makes a piece of mail or parcel suspicious?**

- Has protruding wires, strange odors or stains
- Lopsided, oddly shaped
- Has an unusual weight, given its size
- Shows a city or state in the postmark that doesn't match the return address
- No return address or an addressed that cannot be verified
- Addressed to someone no longer at your location or is outdated in any way
- Marked with restrictive statements, such as "Personal" or "Confidential"
- Mail may have distorted handwriting or the name and address may be prepared with homemade labels or cut and pasted lettering
- Mail bombs may have excessive postage. Letter bombs may feel rigid or appear uneven or lopsided
- Package may be unprofessionally wrapped, several combinations of tape used to secure the package
- Package may be endorsed "Fragile - Handle With Care" or "Rush - Do Not Delay"
- Package bombs may make a sloshing sound, but generally do not tick or buzz

**THE MAILROOM WILL NOT DELIVER ANY MAIL AND/OR PACKAGE IF DETERMINED SUSPICIOUS**

### **Use of Gloves for Handling of Mail**

As a general rule, gloves are not required to handle mail. However, if a person desires to use gloves it is recommended that N-dex nitrile type (not latex) gloves be used since these are less likely to cause an allergic reaction. Employees are recommended to use gloves if he/she has open cuts or sores until these injuries heal. Mailrooms are expected to maintain a supply of gloves for employee use.

Employees who wear gloves to handle and deliver mail are to discard the gloves by traditional means (garbage) upon completion of a shift or a work period. For instance, if an employee handles mail in the morning and leaves the work area for lunch, the gloves would be discarded and a new pair would be made available to the employee for the afternoon work period.

Plastic sealing or Zip Lock bags will be available in each site for containment of any suspicious substances.

### **What should I do if I receive a suspicious package in the mail?**

- **Do not try to open the package or envelope.**
- Isolate the parcel or letter, place it in a plastic bag or other container, and do not move it further.
- Evacuate the immediate area.
- Wash hands with soap and warm water
- Make a list of all the people who had contact with the package or envelope, include contact information, and provide the list to the emergency responders.
- **Emergency response personnel will take the parcel away, assess the situation and coordinate with officials, and report back to you with information.**
  
- Contact the following personnel immediately:

- f Site manager, site EHS coordinator, and site medical personnel (if present)
- f PS HQ Security, EHS, Medical and Facilities, as applicable
- f Local police

**What should I do if I am exposed to a substance that I suspect may be a dangerous substance?**

- DO NOT try to CLEAN UP the powder. COVER the spilled contents immediately with anything (e.g., clothing, paper, trash can, etc.) and do not remove this cover!
- Then LEAVE the room and CLOSE the door, or section off the area to prevent others from entering (i.e., keep others away).
- Report the incident to your supervisor immediately who should notify the above PS personnel, building security and police.
  - Ensure everyone who had contact with the piece of mail washes his or her hands with soap and water.
  - Make a list of all the people who had contact with the package or envelope, include contact information, and provide the list to the emergency responders.
  - Place all items worn in contact with the suspicious mail in plastic bags or other container and present them to emergency response personnel.
  - **Emergency response personnel will take the parcel away, assess the situation and coordinate with officials, and report back to you with information.**
  - SHOWER with **soap and water** as soon as possible.

The Supervisor or Site Manager is to ensure that the following take place:

- Notify PS security, EHS, Medical and Facilities.
- Notify the local police and the Postal Inspector at (800) 654-8896.
- Notify local, county, and state health departments.
- Ensure that all persons who have touched the letter wash their hands with soap and water.
- List all persons who have touched the letter and/or envelope. Include contact information. Provide the list to the emergency responders.
- Place all items worn when in contact with the suspected mail piece in plastic bags and keep them wherever you change your clothes and have them available for law enforcement agents.
- If prescribed medication by medical personnel, take it until otherwise instructed or it runs out.

**POSSIBLE ROOM CONTAMINATION BY AEROSOLIZATION:**

1. Turn off local fans or ventilation units in the area.
2. LEAVE area immediately.
3. CLOSE the door, or section off the area to prevent others from entering (i.e., keep others away).
4. Report the incident to your supervisor immediately who should notify the police & building security
5. SHUT down air handling system in the building, if possible.
6. List all people who were in the room or area. Give this list to both the local public health authorities so that proper instructions can be given for medical follow-up and to law enforcement officials for further investigation.

## **PERSONNEL SPECIFIC DUTIES:**

### **Control Room**

- Incident Commander until retrieved.
- Serve as communications coordinator, log all communication.
- Notify Security Manager and Emergency Coordinator.
- Notify additional resources as directed by the Incident Commander.
- Notify First Responders.

### **First Responders**

- Respond to all real and potential emergencies as directed by the CONTROL ROOM.
- Provide traffic and crowd control. Direct emergency vehicles.
- Address security disturbances.
- Provide assistance to outside resources conducting bomb search, but shall not participate directly in bomb search.
- Coordinate with/assist other Responders.
- Perform hazard evaluation.
- Report to the location of the emergency as reported by the CONTROL ROOM, or respond directly to the area of an alarm device.
- Assess the need for evacuation.
- Provide assistance to outside resources conducting bomb search, but shall not participate directly in bomb search.
- Perform hazard evaluation.
- Coordinate with/assist other responders.
- Provide assistance to outside resources.
- Respond to scene as directed by CONTROL ROOM.
- Coordinate with/assist other Responders.
- Provide assistance to outside resources conducting bomb search, but shall not participate directly in bomb search.
- Serve as Incident Commander of First Responders.
- Provide assistance with utility shut off and control.
- Assign personnel to proceed to gate to direct responders to scene.

### **EH&S Manager**

- Determine if threat is genuine.
- Coordinate with/assist Incident Commander.
- Contact local and state police and state police bomb squad, if necessary.

**Emergency Coordinator**

- Request CONTROL ROOM to notify Qualified Individual.
- Serve as Incident Commander, if necessary.
- Provide feedback on necessity of further evacuation needs.

**Qualified Individual**

- Notify the customer and other company officials.

**Fire Department**

- In the event that an emergency expands beyond the capability of plant personnel, the fire department is the primary responding agency.
- Provide “all clear” announcement to the Incident Commander when re-entry into evacuated areas is possible.
- Notifies additional resources (i.e., State Police) through Mutual Aid.

**Incident Commander**

- Coordinate Responders.
- Request CONTROL ROOM to make notifications for additional resources.
- Document response actions and conduct debriefing/critique of procedure.
- Provide the “all clear” signal.

## **SEVERE WEATHER PROCEDURE**

The objective of this procedure is to identify the appropriate actions to take in the event of severe weather, such as hurricanes, tornadoes, snow storms, and/or flooding. These actions are to be taken to protect life, property, and the environment and should be initiated in a timely manner. Although earthquakes are not specifically addressed, the actions described in this procedure and other specific procedures would be initiated depending upon the effects of the tremors on the facility. As part of normal operations plant personnel will monitor the weather via various forms of media (NOAA Weather radio, Internet weather, field observations) and implement this program as necessary.

1. Communications to employees (all shifts) regarding instructions on securing buildings and other areas of responsibility will be directed by management and/or the Incident Commander, depending upon the timing and/or nature of the event. Messages will contain instructions on securing buildings, utilities, and other areas of responsibility, report on the condition of facility gates (open or closed for access), and report on road conditions (road closures, alternative routes, etc.). The communications may be made via the internal phone system, electronic mail, postings, signs, public address systems within buildings, hand-held radios, and/or local radio and televisions stations, depending upon the timing, nature, and severity of the event.

2a. First Responders, Management, and EHS will assist with distributing information and communications as directed by the Incident Commander.

2. Responders and other plant personnel will conduct and/or coordinate defensive measures (if it is safe to do so) as directed by the Incident Commander to protect personnel, the environment, and property from the potential effects of severe weather. All personnel shall use extreme caution if leaving protected areas during high wind events and lightning storms. Concentrate efforts in sensitive areas, including fuel farm, test cells and buildings along the river and in low-lying areas that are susceptible to flooding. In preparation for severe weather, Responders shall refuel all response team vehicles, emergency generators, diesel fire pump, portable pumps.

3a. Prior to events with potentially high winds, Responders and other plant personnel shall patrol the facility to identify and coordinate activities (as appropriate and directed by the Incident Commander) to ensure windows and overhead doors are closed, loose materials outdoors are secured or are placed inside buildings or protected areas.

3b. Prior to potential flooding events, Responders and other plant personnel shall: patrol the facility to identify and coordinate required activities to insure storm drains are open; coordinate with GE EH&S and management and if necessary the off-site hazardous waste contractor to insure drums, tanks, and containers of oils and hazardous materials are properly secured, pumped out, placed inside (if outside), or moved out of areas that are potentially susceptible to flooding (i.e., low lying areas adjacent to storm drains and within the 100-year floodplain); and insure emergency response equipment is accessible.

4. If a medical emergency, fire/explosion, spill/release, and/or utility failure occurs, implement Medical Emergency Response Procedure, Fire/Explosion Emergency Response Procedure, and/or Spill/Release Emergency Response Procedure.

5. The Incident Commander will activate the Emergency Operations Center, if necessary. The Emergency Operations Center will be established in the control room.

6. The EHS Responder and other EHS personnel will evaluate any areas impacted by the severe weather for potential safety and environmental hazards.

7. The Incident Commander shall notify the Emergency Coordinator of any property damage, hospitalization, fire (beyond incipient), or regulatory notification requirements.

8. The Incident Commander will determine when the incident/emergency is over and provide the "all clear" announcement.

9. After the incident/emergency is over, the Incident Commander shall conduct a debriefing/critique of this procedure and document response actions.

## **PERSONNEL SPECIFIC DUTIES**

### **Control Room**

- Incident Commander until relieved
- Serve as communications coordinator, log all communications.
- Notify additional resources as directed by the Incident Commander.
- Notify First Responders.

### **First Responders**

- Respond to all real and potential emergencies as directed by the CONTROL ROOM or Incident Commander.

- Provide traffic and crowd control. Direct emergency vehicles.
- Assist other Responders in conducting defensive response measures.
- EMTs provide initial medical response.
- Provide security.
- Assist with evacuation.
- Perform hazard evaluation.
- Coordinate/assist with other Responders.
- Report to the location of the emergency as reported by the CONTROL ROOM or Incident Commander, or respond directly to the area of an alarm device.
- Conduct evacuation, if necessary.
- Coordinate/assist other Responders.
- Perform hazard evaluation.
- Assist other Responders in conducting defensive response measures.
- Respond to the scene as directed by CONTROL ROOM.
- Coordinate/assist with other Responders.
- Provide assistance with utility shut off and control.
- Perform hazard evaluation.
- Assist other Responders in conducting defensive response measures.
- Assign personnel to proceed to gate to direct outside Responders to scene.

### **Environmental Health and Safety**

- Coordinate activities to address site environmental, health and safety considerations.
- Communicate EHS concerns within their areas of responsibility.
- Conduct any regulatory notifications as directed by the Emergency Coordinator.
- EHS Responder and other EHS personnel patrol the area at a safe distance for additional safety and environmental hazards.
- Direct storage and disposal of waste generated during any emergency response activities.
- Serve as the Incident Commander.
- Assess the location/security of tanks and containers of oils, hazardous materials, and hazardous waste to determine appropriate measures to prevent accidental release or spills during severe weather events.

### **Emergency Coordinator**

- Obtain information on severe weather from all available sources.
- Initiates communications.
- Serve as the Incident Commander.
- Activate the Emergency Operations Center, if necessary.
- Direct or make regulatory notifications.

- Coordinate communications with GEAE upper management.

#### **Incident Commander**

- Coordinate Responders.
- Request CONTROL ROOM to make notifications for additional resources.
- Serve as Incident Commander of the First Responders and when the EHS Responder and/or Emergency Coordinator is off site and cannot respond because of the weather.
- Document response actions and conduct debriefing/critique of ERP.
- Provide the “all clear” announcement.

#### **Facility Management**

- Issue communications regarding instructions on securing buildings and other areas of responsibility, with emphasis on securing the physical plant, utilities, and areas of potential EHS impacts.
- Managers provide coordination in their specific areas of responsibilities.

#### **Other Plant Personnel**

- Patrol the outside of plant areas to ensure windows and overhead doors are closed, loose outdoor materials are secured or are placed inside buildings or protected areas, storm drains are open.
- Coordinate with the on-site hazardous waste contractor and/or waste water personnel to insure drums, tanks, and containers of oils and hazardous materials are properly secured, pumped out, placed inside (if outside), or moved out of areas that are potentially susceptible to flooding.
- Assist Responders with defensive measures if it is safe to do so.

## **ANHYDROUS AMMONIA RELEASE PROCEDURE**

The objective of this Anhydrous Ammonia Release Emergency Response Procedure is to identify the appropriate actions to take when a release of anhydrous ammonia occurs from the storage tank, lines, or vaporization equipment located on the south side of facility. The intent is to minimize the health, safety and environmental impacts from a release of anhydrous ammonia at the facility and surrounding community and to restore the facility to normal operating conditions as quickly as possible.

1. Ammonia has a strong, pungent odor that makes even the smallest of leaks easily detectable by smell. A medium to large leak of ammonia could be detectable from a safe distance through a visual white cloud escaping from the source leak.
2. A release is controllable if the ammonia flow can be shut-off or contained without employees being exposed to health or safety risks, or where the rate of release does not pose immediate danger (e.g., a faint ammonia odor is evident). In this situation, notification should be made immediately to CONTROL ROOM to alert First Responders who are properly trained to shut down required processes, if necessary, and/or the ammonia gas flow.
3. A release is uncontrollable if attempts to shut-off or control the ammonia flow would place a person at a health or injury risk. In this situation, persons should not attempt to contain the release. Instead, they should evacuate the immediate area of the release by moving laterally or upwind of the release area and initiate notifications as indicated below. In the event of an uncontrollable release, the public will be notified and evacuated by the police and fire department. If there is a large vapor release the water deluge system should be triggered remotely to quench the offending vapors.
4. After personnel move to a location lateral or upwind from the release area, they should call the CONTROL ROOM and inform the CONTROL ROOM of the location (inside or outside) of the release and wind direction or direction in which the vapors appear to be moving (if known).
5. The CONTROL ROOM shall dispatch the First Responders to the scene. The Responder(s) will approach the area from an upwind or lateral direction to secure the area and determine whether evacuation of the Plant is necessary and/or outside resources are needed to control the release.

6. If evacuation is required, First Responders shall follow the Evacuation Procedure and direct employees along evacuation routes and to a rally point that would not be exposed to the ammonia vapors.
7. Upon evaluation of the release at a safe distance, the Incident Commander will request the CONTROL ROOM to notify fire department (external 911) and/or the on-site hazardous waste contractor to control the release. The CONTROL ROOM will provide the outside responders with directions to approach the incident safely. If these outside resources are called in, the Incident Commander shall also request the CONTROL ROOM notify the EHS Responder and Emergency Coordinator.
8. If it is safe to do so, First Responders shall coordinate with plant personnel to shut off any ventilation systems and close windows and doors in the area to prevent the spread of the ammonia vapors to other areas of the building.
9. Emergency Coordinator report to the scene, if necessary, and coordinate with fire department and/or hazardous waste contractor to determine if additional evacuation of the facility and any off-site, downwind locations is necessary. The Incident Commander will open the Emergency Operations Center, if necessary, and coordinate the response efforts from there or an alternative location.
10. The EHS Responder will evaluate the need for regulatory reporting (if the release exceeds the reportable quantity or there is an off-site threat) and contact the Emergency Coordinator if regulatory notification is required.
11. Responders shall continually evaluate the need for medical services, rescue operations, and additional evacuation. Indication of potential serious health effects from ammonia vapors may include convulsive coughing, difficult and painful breathing, and/or eye irritation. Direct skin contact with liquid anhydrous ammonia can produce chemical and freeze burns requiring prompt medical attention.
12. After the ammonia release has been controlled and ammonia vapors have dissipated, the Incident Commander shall meet with the Responders to determine that no threat to health or safety exists and then give the all clear signal.
13. After the incident is terminated, the Incident Commander will document response actions and conduct a debriefing/critique of the Anhydrous Ammonia Release procedure.

## **PERSONNEL SPECIFIC DUTIES:**

### **Control Room**

- Incident Commander until relieved.
- Serve as communications coordinator, log all communications.
- Notify the First Responders.
- Notify additional resources as directed by the Incident Commander.

### **First Responders**

- Respond to all real and potential emergencies as directed by the CONTROL ROOM and/or Incident Commander.
- Provide security.
- Provide traffic and crowd control. Direct response vehicles.
- Coordinate/assist with other Responders.
- Assist with evacuation.
- Provide medical assistance.
- Assist with closing windows and doors and shutting down the building ventilation system if it is safe to do so.
- Assist in keeping people away from the affected area until the all clear signal is given by the Incident Commander.
- Perform hazard evaluation.
- Report to the location of the emergency as reported by the CONTROL ROOM and/or Incident Commander.
- Perform hazard evaluation.
- Coordinate with/assist other responders.
- Direct response vehicles.
- Assist with evacuation.
- Assist with closing windows and doors and shutting down the building ventilation system if it is safe to do so.
- Assist in keeping people away from the affected area until the all clear signal is given by the Incident Commander.
- Coordinate with/assist other Responders.
- Serve as Incident Commander, if necessary.
- Request CONTROL ROOM to notify EHS Responders, on-site hazardous waste contractor, fire department, and Emergency Coordinator, if necessary.
- Assist with closing windows and doors and shutting down the building ventilation system if it is safe to do so.

- Provide assistance with utility shut off and control.
- Assign personnel to proceed to gate to direct Responders to scene.
- Assist in keeping people away from the affected area until the all clear signal is given by the Incident Commander.

#### **Maintenance Personnel**

- Perform any necessary immediate process or ammonia flow shut downs, check for leaks, make minor repairs (e.g., tighten valves, fittings, etc.) if qualified and it is safe to do so.
- Provide assistance with utility shut off and control.
- Assist with closing windows and doors and shutting down the building ventilation system if it is safe to do so.
- Assist in keeping people away from the affected area until the all clear signal is given by the Incident Commander.

#### **Environmental Health and Safety**

- EHS Responder and other EHS personnel patrol the area at a safe distance to identify additional safety and environmental hazards.
- Serve as Incident Commander, if necessary.
- Evaluate the need for regulatory reporting and make regulatory notifications as directed by Emergency Coordinator.
- Assist with evacuation.
- Assist in keeping people away from the affected area until the all clear signal is given by the Incident Commander.

#### **Emergency Coordinator**

- Coordinate with other Responder(s).
- Serve as Incident Commander, if necessary.
- Direct regulatory notifications.
- Coordinate with regulatory agencies if evacuation is necessary.

#### **Incident Commander**

- Coordinate Responders.
- Request CONTROL ROOM to make notifications for additional resources.
- Notify Emergency Coordinator of any property damage, injuries, or hospitalization.
- Coordinate with fire department.
- Provide the all clear signal once the incident is resolved.
- Document response actions and conduct debriefing/critique of the procedure.

**Off-site Hazardous Waste Contractor**

- Contain or control the ammonia release using appropriate measures (water deluge spray and/or cover with tarp) wearing appropriate PPE level.
- Take defensive measures to prevent any water used for defensive measures from reaching storm drains.
- Assist with closing windows and doors and shutting down the building ventilation system if requested by the Incident Commander if PPE is required to perform the tasks.

**Fire Department**

- Provide a water deluge spray, if required, to control an ammonia vapor release.
- Provide medical assistance.
- Conduct search and rescue operations.

## **CIVIL STRIFE AND SABOTAGE/TERRORISM THREAT** **PROCEDURE**

The objective of this emergency response procedure is to identify the appropriate actions to take during periods of civil strife or suspected acts of sabotage or terrorism.

1. Upon notification or identification of suspected acts of sabotage, terrorism or civil strife that involve or could potentially involve the facility, the main gate shall be closed and all personnel shall be identified prior to opening the gate.
2. The facilities' fence line and on-site areas shall be monitored using cameras installed at the around the facility.
3. Should telephoned threats be directed to personnel, property or identified as bomb threats, the procedures for the bomb threat checklist should be followed.
4. Notify the police via 911 and request assistance.
5. For acts and threats of sabotage and terrorism the following notifications shall occur;
  - Notify local police via 911 and request assistance.
  - Notify the FBI offices.
6. If the event takes place during off normal duty hours, members of the management team shall be notified and at least one member of the management team shall travel to the site and remain until the incident is over.
7. If the incident requires, the Fire Department shall be notified by calling 911.
8. No employee of this facility shall engage in verbal or physical confrontation with any person or persons taking part in any type of demonstration or other actions that may be considered to be civil strife, sabotage, or terrorism.
9. Notify NYISO via the Ring Down line, or telephone contact provided for dispatch.