Purpose

Trinity Medical Management ("Trinity") takes a very responsible attitude toward safety. Proper emergency planning and response are important elements of every safety and health program, to help minimize employee exposure and injury. A number of regulations require that we develop and implement a written Emergency Response Plan to handle possible emergencies before it is necessary to perform emergency response operations.

Trinity has established this program because chemical spills can pose significant safety and health risk, when not handled properly. Specific activities and associated hazards differ with each worksite; therefore, this plan is general in content. However, an Emergency Response Plan will be prepared and implemented for each individual worksite prior to engaging in any preplanned work activities. Each individual plan will address the specific hazards to that site.

The Operations Manager or designee is responsible for developing and maintaining our facility's emergency response plan(s). Plans are available for review and are kept in the Operations office and at each worksite.

Our plan includes the following elements:

- Personnel roles, lines of authority, and communication procedures,
- Pre-emergency planning,
- Emergency recognition and prevention,
- Emergency medical and first-aid treatment,
- Methods or procedures for alerting onsite employees,
- Safe distances and places of refuge,
- Site security and control,
- Evacuation routes and procedures,
- Decontamination procedures,
- Critique of response and follow-up, and
- Personal protective and emergency equipment.

Administration

The Operations Manager is responsible for the implementation and maintenance of this program. A copy of the HAZWOPER Emergency Response Safety Program is located in the Operations office.

General Information

In the event of an emergency situation, emergency responders such as fire, police, and hospital are notified. The contact information for these facilities may differ for each worksite depending on the physical location.

A copy of each site-specific plan will be sent to the local emergency planning committee (LEPC) for that particular area as part of our preplanning. In the event of an emergency situation, the public is notified by the local police, fire, sheriff and/or LEPC. Trinity will contact these agencies using landline or cellular telephones.

In the event of an emergency situation an employee(s) is to immediately notify their supervisor. If evacuation becomes necessary, the alarm as described in the company's Emergency Action Plan will be sounded. This alarm is one blast from an air horn and/or vehicle horn. Employees will then evacuated to their designated safe area for a headcount and further instructions.

The senior emergency response official responding to an emergency shall become the individual in charge of a site-specific Incident Command System (ICS). All emergency responders and their communications shall be coordinated and controlled through the individual in charge of the ICS assisted by the senior official present for each employer.

The "senior official" at an emergency response is the most senior official on the site who has the responsibility for controlling the operations at the site. Initially it is the senior officer on the first-due piece of responding emergency apparatus to arrive on the incident scene. As more senior officers arrive (i.e., battalion chief, fire chief, state law enforcement official, site coordinator, etc.) the position is passed up the line of authority that has been previously established. The CEO is our point of contact between our facility and public authorities.

The LEPC is the agency on the local level that is involved with emergency response. Our coordination with the LEPC is making sure that they receive a copy of each site-specific Emergency Response Plan for preplanned work activities.

These numbers are posted prominently on-site. This information may change with each worksite depending on their physical location.

Emergency Response Team (ERT)

Trinity has developed emergency response capabilities that are appropriate to the individual situation. Our team members have been trained to one or more of the following levels.

First Responder Awareness Level

Individuals who are likely to witness or discover a hazardous substance release are trained to initiate an emergency response sequence by notifying the proper authorities of the release.

First Responder Operations Level

They are trained to respond in a defensive fashion without actually trying to stop the release to protect persons, property and the environment. Their function is to contain the release from a safe distance, keep it from spreading, and prevent exposures. First responders at the operational level shall have received at least eight hours of training or have had sufficient

experience to objectively demonstrate competency in the following areas in addition to those listed for the awareness level and the employer shall so certify:

- Knowledge of the basic hazard and risk assessment techniques.
- Know how to select and use proper personal protective equipment provided to the first responder operational level.
- An understanding of basic hazardous materials terms.
- Know how to perform basic control, containment and/or confinement operations within the capabilities of the resources and personal protective equipment available with their unit.
- Know how to implement basic decontamination procedures.
- An understanding of the relevant standard operating procedures and termination procedures.

Hazardous Materials Technician

Hazardous materials technicians are individuals who respond to releases or potential releases for the purpose of stopping the release. They assume a more aggressive role than a first responder at the operations level in that they will approach the point of release in order to plug, patch or otherwise stop the release of a hazardous substance. Hazardous materials technicians shall have received at least 24 hours of training equal to the first responder operations level and in addition have competency in the following areas and the employer shall so certify:

- Know how to implement the employer's emergency response plan.
- Know the classification, identification and verification of known and unknown materials by using field survey instruments and equipment.
- Be able to function within an assigned role in the Incident Command System.
- Know how to select and use proper specialized chemical personal protective equipment provided to the hazardous materials technician.
- Understand hazard and risk assessment techniques.
- Be able to perform advance control, containment, and/or confinement operations within the capabilities of the resources and personal protective equipment available with the unit.
- Understand and implement decontamination procedures.
- Understand termination procedures.
- Understand basic chemical and toxicological terminology and behavior.

Hazardous Materials Specialist

Hazardous materials specialists are individuals who respond with and provide support to hazardous materials technicians. Their duties parallel those of the hazardous materials technician, however, those duties require a more directed or specific knowledge of the various substances they may be called upon to contain. The hazardous materials specialist would also act as the site liaison with Federal, state, local and other government authorities in regards to site activities. Hazardous materials specialists shall have received at least 24 hours of training

equal to the technician level and in addition have competency in the following areas and the employer shall so certify:

- Know how to implement the local emergency response plan.
- Understand classification, identification and verification of known and unknown materials by using advanced survey instruments and equipment.
- Know the state emergency response plan.
- Be able to select and use proper specialized chemical personal protective equipment provided to the hazardous materials specialist.
- Understand in-depth hazard and risk techniques.
- Be able to perform specialized control, containment, and/or confinement operations within the capabilities of the resources and personal protective equipment available.
- Be able to determine and implement decontamination procedures.
- Have the ability to develop a site safety and control plan.
- Understand chemical, radiological and toxicological terminology and behavior.

<u>On-Scene Incident Commander</u>

Incident commanders, who will assume control of the incident scene beyond the first responder awareness level, shall receive at least 24 hours of training equal to the first responder operations level and in addition have competency in the following areas and the employer shall so certify:

- Know and be able to implement the employer's incident command system.
- Know how to implement the employer's emergency response plan.
- Know and understand the hazards and risks associated with employees working in chemical protective clothing.
- Know how to implement the local emergency response plan.
- Know regulations of the state emergency response plan and of the Federal Regional Response Team.
- Know and understand the importance of decontamination procedures.

Team Members

<u>Emergency Coordinators/On-Scene Incident Commanders</u>

The Company will designate a Primary Emergency Coordinator and at least two Alternative Emergency Coordinators. Each team member has received 40-Hour HAZWOPER training qualifying them for all levels of response. All of the above-referenced responders are:

1. Adequately trained for their intended job duties and functions.
2. Properly equipped for the intended tasks.
3. Capable of responding in a safe manner.
4. Managed by competent leaders.

Trainers

The Training and Compliance Manager is responsible for administering the HAZWOPER Training Program to all employees. They have the training and/or academic credentials and instructional experience to demonstrate competency.

All employees will be trained in the area they are working in. Training will be based on duties and functions. Employees who are trained in accordance with the plan will receive annual refresher training. A record of methods used will be maintained.

Emergency Response Plan

An emergency response plan will be developed & implemented to handle anticipated emergencies prior to the commencement of emergency response operations. The plan will be in writing & available for inspection by employees, their representatives & OSHA.

The minimum items will be addressed:

1. Pre-emergency planning & coordination with outside parties.
2. Personnel roles, lines of authority, training & communications.
3. Emergency recognition & prevention.
4. Safe distances & places of refuge.

The senior official at an emergency response is the most senior official on the site who has the responsibility for controlling operations at the site.

Emergency response employees who exhibit signs or symptoms which may have resulted from exposure to hazardous substances during the course of an emergency will be provided with medical consultation.

Chemical protective clothing and equipment used by hazardous material specialists will meet the requirements of paragraph (q)(3) through (5) of this section.

Upon completion of the emergency response, if it is determined that it is necessary to remove hazardous substances, health hazards and materials contaminated with them (such as contaminated soil or other elements of the natural environment) from the site, the ERP must specify how this is to be accomplished. Trinity does not perform abatement and hazardous waste removal.

Response Actions

As is true in most settings, spills can occur in a variety of locations at sites-at the loading docks, in a chemical storage room, where the substance is used, throughout the facility during its internal transport. Most spills are minor, requiring minimal, yet timely cleanup. These are not emergency response situations; they can be taken care of by anyone familiar with the chemical and trained in clean-up of it. Our specific policy for small spills is:

1. Notify supervisor.
2. Don necessary personal protective equipment.

3. Place absorbent on spill.
4. Clean up and dispose of according to state and federal regulations.

A large spill requires a much more concentrated action. In general, the prescribed response to a large spill is:

1. Contact Emergency Coordinator who will mobilize an Emergency Response and notify the appropriate local, state and federal agencies.
2. All response personnel are made fully aware of the hazards they will be encountering.

Acid or Caustic Spills

1. Don appropriate and required PPE.
2. Contain with acid absorbent.
3. Begin fluid removal with an acid/base diaphragm pump. Material is pumped into DOT approved plastic drums.
4. Leaking drums are placed in a clean poly overpack.
5. All contaminated material is disposed of as either special waste or hazardous waste depending on its substance and profile.

Fuel Spills

1. Don appropriate and required PPE.
2. Containerize with earthen berms, absorbent booms, or hard booms depending on whether the spill was on water or soil.
3. Remove free product and over-excavate if necessary.
4. All contaminated soil is disposed of as special waste and water at POTW or TSD.

   NOTE: if the spill is of fair size (over 500 gallons of fuel, or more that a drum of hazardous material spilled) we will mobilize a Hazmat Trailer for supplies and use as a command post.

Each site-specific ERP should include an inventory of the hazardous substances found on site, the quantities in which they are stored and the consequences of an uncontrolled release. Scenarios or circumstances that trigger activation of the ERP should be described for the various hazardous substances stored in sufficient quantities to cause a potential emergency. Reasonably predictable worst–case scenarios must be made in the planning phase.

Chemical process operators who have informed the incident command structure of an emergency, who have adequate PPE and training in the procedures they are to perform and who employ the buddy system, may take limited action in the danger area (e.g., turning a valve) before the emergency response team arrives. The limited action taken by process operators must be addressed in that Company's Emergency Response Plan. Once the emergency response team arrives, these employees would be restricted to the actions that their training level allows.

This limited action assumes that the emergency response team is on its way, their arrival is imminent, and that the action taken is necessary to prevent the incident from increasing in severity (i.e., to prevent a catastrophe). Companies must inform employees during their training that they are to evacuate when they lack the capabilities to respond in a safe manner and in accordance with the standard operating procedures defined in the Emergency Response Plan.

Blueprint for Response

Our company's role in response plans as far as personnel roles, lines of authority, and communication procedures are concerned are as follows:

Personnel Roles

Each member of our Response Team has received a level of training that allows them to engage in every level of a response. The first member to arrive will act as the On-Scene Incident Commander (IC) until the most senior person arrives. The most senior person will then take over as IC and direct the Emergency Response.

Lines of Authority

The on–scene IC must notify the Operations Manager expeditiously in the event of a release that would require an emergency response. Although employees at the scene of the release may be expected to inform their supervisors (as opposed to the on–scene IC), the supervisor, unless properly trained, can do nothing other than call for the emergency response personnel and report what is known to be present.

All Emergency Response Personnel have been trained to the level required by their job function and responsibility prior to performing any emergency response operation. All emergency responders have received refresher training sufficient to maintain or demonstrate competency annually.

Tracking the training and retraining will be accomplished by the Training and Compliance Manager. Certificates signed by employees are handed out upon completion of their training.

Lines of Communication

In the event of an emergency situation an employee(s) is to immediately notify their supervisor who will contact the Emergency Coordinator and initiate an emergency response. If evacuation becomes necessary, the alarm as described in the company's Emergency Action Plan will be sounded. This alarm is one blast from an air horn and/or vehicle horn. Employees will then evacuated to their designated safe area for a headcount and further instructions.

Each site-specific ERP will include a map with safe places of refuge identified for each section of the area where emergencies could occur. The map contains the location of all buildings, structures, equipment, emergency apparatus, first aid stations, routes of entry and exit,

emergency exit routes and alternate routes, staging areas, and safe places of refuge. The adequacy of safe refuge areas was determined for the worst-case scenario.

Areas surrounding the danger area need to be controlled during emergencies by prohibiting unauthorized personnel from entering the hot zone. Trained employees will control entry and exit in the area. The guidelines for our site security and control consist of:

- Areas surrounding the danger area need to be controlled during emergencies by prohibiting unauthorized personnel from entering the exclusion zone or hot zone.
- Personnel expected to set up the exclusion zone must be trained to the first responder operations level.
- Once the exclusion zone is set, employees (preferably trained to the first responder awareness level) may control entry and exit in the area. An employee trained to the first responder awareness level may not set up safe distances because they lack knowledge regarding potential of exposure, explosion, or radiation. For example: in a traffic accident police trained to the first responder awareness level could divert traffic or control crowds; while a fire fighter trained to the first responder operations level could set up the exclusion zone to determine how close to the accident cars should be permitted to drive.

All employees that are not trained in emergency response and who will not be needed during the response operation will be evacuated from the danger zone. All employees that are not trained in emergency response and who will not be needed during the response operation should be evacuated from the exclusion and decontamination zones.