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Purpose

Trinity Medical Management ("Trinity") is dedicated to the protection of its employees from emergencies such as tornadoes and fires. When emergencies do occur, our Emergency Action Plan (EAP) is initiated. This EAP is in place to ensure employee safety from emergencies during regular hours and after hours. It provides a written document detailing and organizing the actions and procedures to be followed by employees in case of a workplace emergency.

OSHA's Emergency Action Plan requirements expect Trinity to have a written emergency action plan (EAP). This EAP addresses emergencies that our company expects may reasonably occur at any of sites.

The EAP communicates to employees, policies and procedures to follow in emergencies. This written plan is available, upon request, to employees, their designated representatives, and any OSHA officials who ask to see it.


Our emergency action plan must be in writing, kept in the workplace, and available to employees for review.

Administrative Duties

The Operations Manager (or designee) is the EAP administrator, who has overall responsibility for the plan. This responsibility includes the following:

- Developing and maintaining a written Emergency Action Plan for regular and after hours work conditions;
- Notifying the local fire or police departments, and the building owner/superintendent in the event of an emergency affecting the facility;
- Taking security measures to protect employees;
- Integrating the Emergency Action Plan with any existing general emergency plan covering the building or work area occupied;
- Distributing procedures for reporting emergencies, the location of safe exits, and evacuation routes to each employee;
- Conducting drills to acquaint employees with emergency procedures and to judge the effectiveness of the plan;
- Training designated employees in emergency response such as the use of fire extinguishers and the application of first aid;
- Deciding which emergency response to initiate (evacuate or not);
- Ensuring that equipment is placed and locked in storage rooms or desks for protection;
- Maintaining records and property as necessary; and
- Ensuring that our facility meets all local fire codes, building codes, and regulations.

The Operations Manager is responsible for reviewing and updating the plan as necessary. Copies of this plan may be obtained from the Operations office.

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The Operations Manager has full authority to decide to implement the EAP if he believes an emergency might threaten human health. The following potential emergencies might reasonably be expected at this facility or work areas and thus call for the implementation of this EAP:

- Fire emergencies (process area fires, non-pressurized tank fires, pressurized tank fires, fires at loading facilities, warehouse fires, office building fires, electrical fires)
- Toxic gas releases
- Flammable gas releases
- Hazardous liquid spills
- Oil spills
- Release of radiation
- Tornadoes
- Winter storms
- Flooding
- Earthquakes
- Bomb threat/Civil disturbance.
- First-aid emergencies

The Operations Manager can be contacted regarding further information about duties under this written Emergency Action Plan


Key management personnel home telephone numbers are kept in a safe place, on office and work area bulletin boards, and in company vehicles, for immediate use in the event of an emergency. These telephone numbers of key management personnel have been distributed all supervisors to be retained in their homes for use in communicating an emergency occurring during non-work hours:

If, after reading this plan, you find that improvements can be made, please contact the Operations Manager. We encourage all suggestions because we are committed to the success of our Emergency Action Plan. We strive for clear understanding, safe behavior, and involvement in the program from every level of the company.

Alarms

Different emergencies call for different alarms to indicate what actions employees should take. Trinity has established an employee alarm system that complies with OSHA regulations. The Company has and maintains an employee alarm system. The employee alarm system uses a distinctive signal for each purpose. We will use the tornado alarm to warn employees of tornado warnings only.

We have posted the emergency telephone numbers near telephones, or emergency notice boards, and other conspicuous locations for use when telephones serve as a means of reporting emergencies.

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Emergency Reporting and Weather Monitoring Procedures

In the Event of an Emergency Requiring Evacuation

When employees detect an emergency that requires an evacuation, such as a fire or hazardous release, they should activate the fire alarm and exit the building to the designated safe area for a headcount. The fire department will be notified via telephone.

In the Event of a Tornado Watch

We monitor tornadoes by severe weather radio. When available, our backup method for monitoring tornadoes includes city and county tornado sirens

Emergency Evacuation Procedures

Some emergencies require evacuation or escape procedures, while some require employees to stay indoors, or in a safe area. Our emergency escape procedures are designed to respond to many potential emergencies, depending on the degree of seriousness. Nothing in these procedures precludes the plan administrator's authority in determining whether employees should remain inside or evacuate.

The Company must designate and train employees to assist in a safe and orderly evacuation of other employees.

Trinity procedures for evacuation must include type of evacuation and exit route assignments.

At this company, the following types of emergency evacuations exist:

- total and immediate evacuation
- partial evacuation


Our emergency escape procedures and assignments are designed to respond to many potential emergencies that require them, including: fire, tornado, bomb threat, and chemical release.

Employees need to know what to do if they are alerted to a specific emergency. After an alarm is sounded to evacuate, employees should take the following steps:

- Cease work immediately and proceed to the nearest available exit.
- Go to your designated safe area for a headcount and further instructions.

Procedures to Account for Employees

Trained evacuation personnel assist in safe and orderly evacuation for all types of emergencies that require evacuation. Once evacuation is complete, they conduct head counts. The employees selected are trained in the complete workplace layout and the various alternative escape routes from the workplace. All trained personnel are made aware of employees with

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disabilities who may need extra assistance, such as using the buddy system, and of hazardous areas to be avoided during emergencies. Before leaving, these employees check rooms and other enclosed spaces in the workplace for employees who may be trapped or otherwise unable to evacuate the area.

Frontline supervisors must be aware of the locations of those employees working on a particular day when an emergency occurs, and be aware of who is absent or otherwise away from the premises. Accounting for employees will aid local responding fire/rescue departments in determining whether rescue efforts are necessary.

Once each evacuated group of employees have reached their evacuation destinations, each trained evacuation employee:

- Takes roll of his or her group,
- Makes sure all persons are accounted for,
- Reports in to a central checkpoint managed by [RSO Name], RSO, and
- Assumes role of department contact to answer questions.

NO employees should remain in the affected area(s). Head count results should be given to the Fire Chief or firefighter, if requested.

No employees are to return to their work area until advised by the Operations Manager, CEO, or designee (after determination has been made that such re-entry is safe).

Fire


Upon sounding the alarm, all personnel shall evacuate the work area by the most direct route. The routes are shown on the work place maps posted on the bulletin boards.

Prior to exiting, turn off machine at your work station or close the valves on gas operated equipment such as oxygen/acetylene carts. Do not try to retrieve items or tools.

[RSO Name], prior to exiting the area, shall ensure that all equipment is secured and all areas are checked to ensure that no employee remains in his area.

All employees shall go directly upon sounding the alarm to the parking lot and assemble with your Supervisor for a head count. At no time will you leave this area unless directed by management or supervision. Do not try to re-enter the work area to obtain personal items or tools. Supervisors will report to the Operations Manager or his or representative with the names of all employees counted and any unaccounted for personnel as soon as the head count is completed.

Any fire fighting, rescue or medical duties will be performed by the fire department, police department, or hospital medical personnel. At no time will our personnel attempt on their own initiative, a rescue or fire suppression, after departing the area. The only fire fighting attempted by our personnel will be in the incipient stage of the fire.

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Should an employee discover a fire, he or she will notify the Supervisor in that area who will advise the Operations or Training and Compliance Manager or his or her representative. At the same time the Supervisor will direct the use of fire extinguishers against the fire and evacuate when he or she deems it necessary.

The Operations Manager or designee will be responsible for furnishing any further information to the employees concerning this plan.

Tornado

Upon being advised of the distinct possibility that a tornado may strike the area the Operations Manager or his representative shall sound the alarm. All personnel shall seek shelter immediately by either crawling under sturdy work benches, equipment, inside rooms or basements within the shop after shutting off power to machines.

Upon sounding the all clear signal which will be a voice signal and providing the tornado missed the property, all personnel shall resume normal production duties.

If the tornado strikes the shop and the all clear is sounded by the U.S. Weather Bureau, it may be necessary to evacuate part of the work area.

Personnel in each building will be advised by voice communication by the Operations Manager or his representative as to what action is necessary. If evacuation is deemed necessary, those personnel to be evacuated will proceed directly to the parking lot. Do not try to retrieve personal items or tools. Head counting procedures will be the same as for fires. At no time will you leave this area unless directed by management or supervisory personnel.


All fire fighting, rescue and medical duties will be performed by fire department, police department, and hospital medical personnel. At no time will our personnel attempt on his/her own initiative a rescue after departing the work area.

Management will be responsible for furnishing any further information to the employees.

Earthquake

Upon realization that an earthquake is occurring, get under the nearest workbench or equipment that will provide you overhead protection from falling objects. Try to stay away from electrical lines and overhead storage racks containing heavy objects.

Upon sounding the alarm, all personnel shall evacuate the area by the most direct exit. The routes are shown on the work place maps posted on bulletin boards. Prior to your exit turn off your machine at your work station and close the valves on gas operated equipment such as oxygen/acetylene welding carts. Do not try and retrieve personal items or tools.

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The Operations Manager, prior to exiting the work area, shall ensure that all equipment is secured and all areas are checked to ensure that no employee remains on the work area.

All employees shall go directly upon sounding of the alarm to the parking lot and assemble with your Supervisor for a head count. At no time will you leave the area unless directed by management or supervisory personnel. Do not try to re-enter the work area to obtain personal items or tools. Supervisors report to the Operations Manager or his or her representative the names of personnel counted and any unaccounted personnel as soon as the head count is completed.

Any rescue or medical duties will be performed by fire departments, police departments, or hospital medical personnel. At no time will our personnel attempt to initiate a rescue or fire suppression after departing the work area.

Terrorist Bomb Threat

Conduct Bomb Search

All supervisory personnel shall be advised by voice communication that a bomb threat has been received by the company at this work area.

All work activities shall cease in the suspected areas and a planned, organized search for the suspected bomb will be conducted by all personnel. They are to be instructed to look for any item that normally would not be in this area. This could be a package, bundle, sack, box, or any object that might look suspicious.

Employees are to be instructed never to touch the object in any way, but to notify supervision that in turn advise fire and police personnel of the find.


At this time management must consider the possibility of a partial evacuation of the area. If this evacuation is deemed advisable then evacuation procedures outlined in the following paragraph shall be followed.

Evacuation

Upon sounding the alarm, personnel shall evacuate the area by the most direct exit.

The routes are shown on the work place maps posed on bulletin boards.

Prior to exit, turn off your machine at the work station or close valves on gas operated equipment. Do not try to retrieve personal items, tools or vehicles. The Operations Manager, prior to exiting the work area, shall ensure that all equipment is secured and all areas are checked to ensure no employees remain on the work area. LEAVE THE LIGHTS ON TO ASSIST SEARCH PERSONNEL.

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The employees shall go directly upon sounding of the alarm, to the parking lot and assemble with your Supervisor for a head count.

At no time will you leave this area unless directed by management or supervisory personnel. Do not try to re-enter the building or grounds to obtain personal items or tools or cars. Supervisors shall report to the Operations Manager or his representative the names of all employees counted and any unaccounted for personnel as soon as head count is completed.

Hazardous Chemical Release

In the event of an accidental release of hazardous chemicals, an evacuation would be required if the release is in a significant amount to cause, or have potential to cause, harm to employees.

After it is determined that there is a hazardous chemical emergency, the Management Team will be notified and make the decision whether to evacuate any areas. All unqualified Employees should remain clear of any spill or release of any hazardous material. If evacuation procedures have been initiated, ALL EMPLOYEES MUST LEAVE THE PLANT and proceed to the designated meeting area

NO ONE MAY ENTER THE RELEASE/SPILL/AFFECTED AREAS WITHOUT PROPER PERSONAL PROTECTIVE EQUIPMENT AND MANAGEMENT PERMISSION.

PPE is required at all times until the hazard has been dissipated with proof by proper testing procedures.

Maintenance Manager will proceed directly to the emergency area to determine if evacuation or outside help is necessary.


Management will activate the Emergency Response Team if required.

Management will implement the **Emergency Spill Procedures** of the **Spill Prevention Control & Countermeasures Plan** if any hazardous material is released.

Notification of State Department of Environmental Monitoring and EPA is required if spilled oil material discharges or threatens to discharge into a waterway of the State causing a visible sheen on or a discoloration of the surface water or shorelines, or if a reportable quantity for a hazardous substance is discharged or may unavoidably be discharged to a waterway of the State.

Medical Emergencies

All Medical Treatment provided by OHCP employed by Company shall follow the *Trinity Medical Direction Guidelines as established by the Medical Director.*

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After a medical emergency has been identified, the Assigned Manager, Occupational Health Care Professional or Senior Management Team Member and Area Supervisor should be notified immediately. The Area Supervisor has the responsibility to assure that the Assigned Manager, OHCP or Senior Management Team Member has been notified.

The severity of the medical emergency and level of action required will be determined by the on-site OHCP.

All Medical Emergency Care Providers will use the proper PPEs as outlined in the *Control of Bloodborne Pathogens Program* and will follow the proper standards of care.

All injured or ill Employees requiring emergency medical care for life/death medical emergencies will be transported by local Emergency Medical Services (EMS) to the nearest local Hospital.

All non-life/death medical emergencies will be managed by the OHCP and Company Physician following proper standards of care.

All Employees who are involved in an injury or accident shall be screened for drugs and alcohol as prescribed by company policy.

During any emergency, the OHCP or Assigned Manager will have the responsibility to set-up the emergency medical care station at a location directed by the Senior Management Team Member depending on the emergency and relevant conditions.


Rescue or Medical Duties

Trinity employees are prohibited from engaging in rescue and/or medical duties outside their scope of responsibility. Local Emergency Medical Services (EMS) and Fire Departments should be contacted by dialing 911.

Plan Administrator Duties

During an emergency, the Operations Manager will do the following:

- Take all necessary measures to contain the hazard and prevent its spread to other nearby areas, with the assistance of emergency personnel.
- If the emergency is a hazardous material spill, ensure that the hazardous material and any material with which it came into contact (gravel, soil, etc.), will be scraped up using shovels and/or brooms. All this combined material will be considered hazardous waste unless analysis shows otherwise.
- Provide for collection, treatment, and disposal of the waste and contaminated material by the emergency crew or outside contractor, as appropriate.
- Ensure that contaminated soil, liquids, or other material is placed in drums and handled as a hazardous waste.

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- Ensure that the emergency crew restores all emergency equipment to full operational status.
- Assisted by other qualified persons, begin to investigate the cause of the emergency and take steps to prevent a recurrence of such or similar incidents.
- Ensure that the cause of the emergency has been eliminated and that cleanup and restoration have progressed at least to the point of not jeopardizing the health and safety of the employees, and that EPA, state, and local authorities have been notified, if required.
- Ensure that for spills or releases involving a hazardous substance at or above its reportable quantity, the following necessary information is recorded and reported: name of chemical(s) involved, whether the substance is listed under 40 CFR 302—extremely hazardous substances, estimated quantity of the released substance, time of the release and duration, medium into which the substance was released, health risks associated with the release, precautions taken to respond to the release, name and telephone numbers of persons who can be contacted for further information.

Employees should contact the Operations Manager for more information about the plan or an explanation of their duties under the plan.

Training

Our Plan Administrator reviews with each of our employees at the following times, those parts of the Emergency Action Plan that employees must know to protect themselves in the event of an emergency:

- Initially when the plan is developed or the employee initially to a job,
- Whenever an employee's responsibilities or designated actions under the plan change, and
- Whenever the plan is changed.


The information in this plan is not intended for casual reading, but is intended to get the appropriate message across.

Drills are conducted annually. After a drill, the Plan Administrator judges the effectiveness of the plan and reviews any employee input concerning the drill. Employees performing the drill may identify something that did not follow procedure or was ineffective. For example, they may discover doors that would not open; they may enter storage closets instead of exiting; they may get lost and confused. These are the types of things the Plan Administrator needs to hear about after a drill. That way, they can be addressed before a real emergency.

Emergency Action Diagram

The company Emergency Action Diagram showing the following:

- Exit Locations
- Fire Extinguisher Locations

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- Storage Locations for Hazardous/Flammable Materials
- Storage Area for Spill Response Supplies and Personal Protective Equipment
- Tornado Shelters

A copy of this diagram is posted on company bulletin boards and near each exit.

