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Summary

The Branscome Companies' Emergency Action Plan addresses the first response to conditions that pose a potential hazard to life, property, community and the environment. This general plan is to be supplemented at each facility based upon need and exposure.

Any employee involved in a fire, trauma or medical emergency is authorized to call 911 immediately. This action is to be followed by reporting the emergency to the facility's highest level of on-site management who will take over as Branscome's Incident Command until relieved by 911 responders.

Branscome's Incident Command will initiate the Crisis Management Plan.

1.0 Purpose

The purpose of this plan is to:

- Provide instructions for first response to managers and supervisors;
- Provide instructions to all affected employees;
- Ensure that emergency first response is timely and appropriate;
- Coordinate this Emergency Action Plan with Branscome's Corporate Crisis Management Plan;
- Comply with OSHA regulations and other applicable laws; and
- Interface with the local emergency services.

2.0 Scope

This program applies to emergencies such as:

- Plant Evacuation
- Fires
- Explosions
- Hazardous material spills or releases
- Confined space emergencies
- Neighborhood or Civil emergencies
- Bomb or terrorist threats
- Biological threats
- Severe weather, or
- Life-threatening medical emergencies



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3.0 Roles & Responsibilities

3.1 Superintendent or highest level on-site manager serves as the "Incident Commander" for facility emergencies. This role may be delegated to an appropriate individual but the Corporate Office and Director of Safety must be notified.

The first responding unit from the local Emergency Services (911) will normally assume Incident Command upon arrival.

3.2 The Director of Safety will develop, maintain and coordinate the EAP including:

Development of the EAP site notice Oversight of the effectiveness of the EAP Scheduling of required EAP training including First Aid/CPR Maintenance of paperwork

3.3 The Safety Specialist will assist the site with preparations for emergencies including:

Ensuring that a job-specific EAP Notice is posted or readily visible at the work site

Selecting fire extinguishers, first aid supplies and other emergency equipment Ensuring that appropriate emergency equipment, including fire protection is correctly located and readily available for use

Inspecting emergency equipment on a regular basis including when first brought on the job

Liaison with local 911 services.

3.4 Supervisors will support the EAP by:

Ensuring that the information on the EAP Notice is reviewed with each person Ensuring that all employees are aware of their roles during emergencies and go over this information upon starting a new job and periodically as a refresher. Make sure employees are trained in First Aid/CPR/Bloodborne Pathogens and Fire Extinguisher use if they are designated as first responders.

3.5 Employees - It is the responsibility of employees to:

Adhere to the EAP Notice for the site Give assistance as able during an emergency



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Never leave the job site during an emergency but go to Assembly Area unless other assignment or action is required

Help maintain emergency equipment in good order

Attend all assigned training

Follow all manufacturers' safety guidelines for maintenance and use of emergency equipment.

3.6 Designated Special Responders - Occasionally one or more employees may be designated to take a special role during an emergency response. A list with special responder names and assignments will be posted on job sites where such employees are working.

4.0 Definitions

- 4.1 Cold Work Whenever possible and depending on the location, work should be evaluated to determine if methods are available which do not involve Hot Work processes. Portable band saws, hydraulic high capacity shears, bolt cutters and other tooling may offer alternatives to Hot Work torch cutting in demolition. Welding, cutting and grinding should be minimized in sensitive areas to the greatest extent possible.
- 4.2 Crisis Management Crisis Management Plan is the corporate document created by Janine Reid Group, Inc. (revision: 02/10/2010) for Branscome Inc. "The purpose of a crisis management plan is to provide a systematic approach to managing a crisis in an organized fashion... and to maintain the company's credibility and positive image..."
- 4.3 Designated Hot Work Area An area of the shop or facility (indoors or outdoors) that has been designated safe for welding and cutting. This area has been evaluated for absence or protection of fire/safety hazards and authorized Hot Work is permitted.
- 4.4 EAP Emergency Action Plan (EAP) is a written plan that covers incident first response, rescue and evacuation procedures, communications and alarms, responsibilities of designated personnel during emergencies, incident reporting, and required training for those first response responsibilities. The EAP complies with OSHA requirements and highlights best practices within the industry.
- 4.5 Fire Prevention Plan A fire prevention plan is a written document, the purpose of which is to reduce or eliminate fire-related hazards by heightening the fire safety awareness of all employees and to ensure advanced planning for response actions in fire and other emergencies.



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- 4.6 Fire Watch Trained personnel who are in attendance during the entire Hot Work operation and are immediately available to warn personnel, prevent or extinguish a fire, send an alarm or take other effective action if necessary. In some instances the Fire Watch may be required to monitor Hot Work area for specified period upon completion of work.
- 4.7 Hazardous Locations Those areas where fire hazards may exist due to flammable gases or vapors, flammable liquids, or ignitable fibers or filings.
- 4.8 Hot Work Any work that will generate open flame or high heat sources, typically including all forms of welding, oxy-acetylene and oxy-propane torch cutting and brazing, abrasive grinding of ferrous materials, open flame soldering, torch-applied roofing, etc.
- 4.9 Incipient Fire An incipient fire is a smoldering, early stage of fire which can still be successfully extinguished with an available fire extinguisher used by a trained and authorized employee.
- 4.10 Weather Advisory An advisory is issued when special weather conditions are less serious than a warning. They are four events that may cause significant inconvenience, and if caution is not exercised, it could lead to situations that may threaten life and/or property.
- 4.11 Weather Warning A weather warning is issued when a hazardous weather or hydrologic event is occurring, is imminent, or has a very high probability of occurring. A warning is used for conditions posing a threat to life or property.
- 4.12 Weather Watch A watch is used when the risk of a hazardous weather or hydrologic event has increased significantly, but its occurrence, location, and/or timing is still uncertain. It is intended to provide enough lead time so that those who need to set their plans in motion can do so.

5.0 References

- 5.1 29CFR 1910.38, 1910.151, and 1910.157
- 5.2 ANSI Z308.1 Minimum Requirements for Workplace First-Aid Kits Emergency Preparedness and Response http://www.osha.gov/SLTC/emergencypreparedness/index.html
- 5.2 Bloodborne Pathogens Policy



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- 5.3 Branscome's Corporate Crisis Management Plan
- 5.4 Branscome's Environmental Response Plan

6.0 Emergency Action Plan

- 6.1 General Provisions
 - 6.1.1 The following plans may be modified by way of site-specific written and dated instructions. Emergency Numbers and a posted EAP Notice are essential to communicating information during an emergency.

An EAP Notice should be posted in several key places at each facility including near out-going telephones and on employee bulletin boards.

A draft EAP Notice is attached to this policy.

6.1.2 Arrangements should be made on an annual basis for the local Emergency Services (fire, rescue, special tactical teams) to visit the facility and talk with key representatives about emergency response capabilities and needs.

Special drills such as fire or spill response, confined space rescue and fall rescue should also be held and documented by Branscome.

- 6.1.3 In the event of an emergency, employees are alerted by one or more of the following:
 - the sounding of an alarm or horn
 - public address system announcement
 - verbal announcement
 - cell or radio

Specific alarms may be:

- A continuous blast of the horn from heavy equipment or truck
- 6.1.4 In the event of fire or other emergency requiring prompt exit of a building or structure, ALL employees will use the nearest available and safe exit to evacuate immediately.



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Employees will promptly report to their designated Assembly Area and will not leave the Assembly Area until released by their supervisor or the person in charge of the incident's emergency response.

6.1.5 Fire Extinguisher Response - Portable fire extinguishers are provided in the workplace for use of employees who have been trained. In the event of fire, trained employees may use extinguishers to extinguish an incipient (smoldering) fire before evacuating.

911 or other emergency number must be dialed immediately and before attempting to put out an incipient fire.

- 6.1.6 Critical operations shutdown procedures are not required. Employees are not authorized to delay evacuation for this purpose.
- 6.1.7 First Aid All employees who hold a current First Aid/CPR card are authorized to perform rescue or medical duties during an emergency under the state's Good Samaritan Law.
- 6.1.8 Specific Response Plans All employees trained in specific response plans (i.e., confined space rescue, fall from heights rescue, spill response) are authorized to respond based on the plan.
- 6.1.9 After an emergency evacuation, employees are to gather immediately in the designated Assembly Area where they will print their full name on a log or piece of paper held by a supervisor. This log will include the exact time of the sign-in and will be turned over to Incident Commander when requested.

Employees are not to leave the Assembly Area after check-in until directed by Branscome's Incident Commander.

6.2 First Aid & Medical Emergencies

6.2.1 Response

• Each facility, for each shift must have a suitable number of appropriately trained personnel to provide First Aid/CPR. It is recommended that there be at least two trained persons always on site during hours of operation.



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- All supervisors and employees must know the identity of the first aid providers and the location of the nearest hospital and clinic.
- All employees should know the location of the first aid kits and whom to call in an emergency.
- 6.2.2 First Aid Kits are to be appropriately stocked, clean, and easily accessible.

Stocking shall follow minimum requirements of ANSI Z308.1 (most recent edition).

In addition, one or more CPR face shields and a box of large latex-free medical gloves should be readily available for first responder use.

- 6.2.3 Bloodborne Pathogens Clean Up A Bloodborne Pathogens Clean-Up Kit should be located with each First Aid Kit.
- 6.2.4 Emergency Shower & Eye Wash
 - An Emergency Shower & Eye Wash is to be readily available at any bulk chemical unloading operation.
 - Laboratories shall have an Eye Wash station built into a readily available sink.
 - This emergency equipment is to be inspected monthly to make sure it is ready to use and kept clean. Annual testing is also required. Documentation of inspections and testing are to be maintained.
- 6.3 Fire Prevention & Response
 - 6.3.1 Fire Hazards The following are possible fire hazards
 - Electrical Equipment
 - Boilers and other Heat-Producing Equipment
 - Cutting, Welding, and Open Flame Work
 - Flammable and Combustible Materials
 - Smoking
 - Space Heaters
 - Other Fire or Flame Sources specific to the site work



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- 6.3.2 Housekeeping Housekeeping is important especially since it can have an impact on the prevention and minimization of fire. The following actions are required:
 - All waste materials and accumulation of combustibles will be cleaned up and removed on a regular basis.
 - All combustible or flammable materials will be properly used and stored.
 - Soiled and oily rags will be disposed in "safety trash cans."
 - Contractors will be responsible for housekeeping and fire control in all of their actions and operations.
- 6.3.4 Smoking Smoking is prohibited in all Branscome buildings and structures and near chemical and fuel storage. Certain outdoor areas may also be designated as no smoking areas. The areas in which smoking is prohibited outdoors are identified by NO SMOKING signs.
- 6.3.5 Cutting, Welding, and Open Flame Work

Procedures have been developed for cutting, welding and open flame work to minimize the potential for fire. Cutting and welding is to be done by trained, authorized employees. Whenever possible this work will be conducted in the designated welding area in the maintenance shop. However, this is not always possible. Because special care is required in operations areas a Hot Work Permit and Fire Watch are required to work safely OR the job should be evaluated for Cold Work processes (such as use of portable band saw, shear or other mechanical process vs. cutting torch).

6.3.6 Outside Designated Area

If the object to be welded cannot be moved, all moveable fire hazards in the area must be removed to a safe distance, 35 feet in the facility from the object to be welded or guards provided to confine the sparks, heat and slag to the immediate cutting area. If this is not possible, the welding or cutting is prohibited.

6.3.7 Equipment

- An appropriate fire extinguisher will be positioned close by in a state of readiness for immediate use.
- Torches, regulators, pressure-reducing valves, and manifolds are ULlisted or FM-approved.



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• Oxygen-fuel gas systems are equipped with listed and/or approved backflow valves and pressure-relief devices.

6.3.8 Prohibitions

Hot work is prohibited:

- In areas where atmospheres of gases or vapors could develop from residues or accumulations in tanks or confined spaces.
- In areas where a large amount of readily ignitable material is stored.

6.3.9 Hot Work Permits

- A Hot Work Permit is required of any Branscome employee or contractor prior to the performance of welding, cutting, or other operations that may give off sparks, flame or extreme heat outside of designated hot work areas.
- These permits shall be filled out by the employee and signed off by the area supervisor prior to the start of the work.
- A Hot Work Permit form is available in Appendix B.
- Once complete, the permit shall be conspicuously posted in the work area. The permit must be posted for the duration of the work. At the completion of the permitted work, the permit shall be returned to the signing supervisor. These completed forms will be forwarded to the Site Safety Coordinator for retention.
- Permits are only good for one shift or a maximum of 12-hours.
- The permits shall be kept on file for 6 months.

6.3.10 Inspected Area

An inspection of the area where the permitted work is to be performed shall be done by the Branscome or contractor employee as well as by the area supervisor to ensure that fire hazards do not exist. This inspection shall be performed prior to the permit being issued.



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6.3.11 Fire Watch

Personnel assigned to Fire Watch duty have the following responsibilities:

- Be trained in the use of appropriate fire-fighting equipment and how to notify appropriate personnel in the event of a fire.
- Must remain alert at all times for a change of conditions which may create fire or other safety hazard.
- Correct or prevent conditions which may lead to a fire and report conditions to their supervisor at the earliest opportunity.
- Have the authority to stop work if they detect a hazard or other change in safety conditions
- Monitor the work on both sides of the wall or floors and be alert for signs of a fire
- Only attempt to extinguish fires appropriate to the available equipment and their level of training.
- Remain at the work site to monitor for smoldering fires while work is in progress and for at least thirty (30) minutes following job completion or longer depending on nature and location of Hot Work.
- If the Fire Watch must leave the work area, Hot Work must be suspended.

6.3.12 Portable Fire Extinguishers

Portable fire extinguishers are permanently located throughout Branscome's property in accordance with federal, state, and local fire codes. Each extinguisher's location must be clearly marked with a sign, symbol or other locator device easily seen in the case of an emergency.

Only designated employees who have received annual training for incipient stage firefighting are to use the portable fire equipment.

Portable fire extinguishers are to be available in all temporary work sites or locations, ready for use by designated Branscome employees and contractors. In addition, a portable fire extinguisher will be readily available whenever hot work is being performed.

6.3.13 Selection and Distribution of Fire Extinguishers

Fire extinguishers are selected based on the types of anticipated workplace fires and on the size and degree of hazard that would affect their use.



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Class A:

Used for ordinary combustibles such as wood, paper, cloth, rubber and many plastics.

Travel distance of 75 feet or less for employees.

Class B:

Used for flammable liquids, gases and greases.

Travel distance of 50 feet or less for employees.

Class C:

Used for energized electrical equipment or wiring where the electric non-conductivity of the fire extinguisher agent is important.

6.3.14 Maintenance of Fire Equipment

The Site Management is responsible for the monthly inspection and maintenance of all fixed fire extinguishing equipment as well as for the portable fire extinguishers. They must also ensure that the annual maintenance check on portable fire extinguishers is performed.

6.3.15 Record Keeping

For each extinguisher the following records are kept by the Safety Specialist:

- The name of the person or agency that performed the last hydrostatic test, and the test date.
- The signature of the person who performed the test.
- The serial number or other identifier of the fire extinguisher that was tested.

6.3.16 Training of Designated Users

Designated employees will receive training to familiarize themselves with fire extinguisher use and the hazards of incipient stage firefighting. This training is provided on initial assignment and annually thereafter.

6.4 Extreme Weather

6.4.1 Extreme Weather Emergencies

• Branscome prepares for extreme weather situations such as:



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- High wind
- Hurricanes
- Tornadoes
- Extreme winter weather snow & ice
- Flooding

6.4.2 Weather Alerts, Watch & Warnings

The site office or control room monitors local weather conditions through observation and by being alert to National Weather Service information on local radio, TV or at http://forecast.weather.gov.

6.4.3 High Wind Conditions

Since high wind, hurricanes and tornadoes can be expected in our region we have developed special plans for preparation and recover.

The following guidelines are to be used by the Plant Superintendent and other supervisors when they have been notified to prepare for high wind:

- Determine if facility is to be closed immediately and if so notify any Branscome fleet or trucks coming on site
- Notify any contractors on-site to help secure site
- Clean up equipment, outside storage or materials that could be blown
- Protect all outside materials from water and wind damage
- Tie or band together all material or parts of equipment that could be blown
- Remove permit board and all job site signage
- Be ready to turn off electricity, water and gas
- Protect gas tanks, cylinders, and other chemicals
- Remove equipment to high ground if possible
- Anchor portable toilets to stable structures
- Have a list of contact numbers for all company employees assigned to the facility
- Have a list of contact information for services that may need to be called for clean-up and recovery
- Remove important site files, plans and computer equipment if deemed necessary.



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6.4.4 Extreme Winter Weather

Extreme winter weather including heavy snow and ice accumulations can be expected in our region.

The following guidelines are to be used by the Plant Superintendent and other supervisors when they have been notified that the facility will be affected and are to take emergency action:

- Determine if facility is to be closed immediately and if so notify any Branscome employees not needed as well as fleet or trucks coming on-site
- Evaluate snow and ice loads on equipment, building roofs, chemical storage tanks and lines as well as above ground gas and electrical overhead lines
- Contact the electric or gas company if any utility owned lines are in danger
- Contact an emergency utilities contractor to respond to any Branscome-owned utilities that need repair
- Be prepared to deal with snow and ice removal by positioning company loader equipment in a "stand-by" location near the property entrance for easy first access

6.4.5 Flooding

Flooding and Flash Flood can be expected in our region and at Branscome facilities that are located in low areas or near waterways.

The following guidelines are to be used by the Plant Superintendent and other supervisors when they have been notified that the facility will be affected and they are to take emergency action:

- Identify low-lying areas of the facility and the roadways to facilities that have flooded in the past. If on Branscome property, these should be marked with a warning sign "Flood Area" or "Flash Flood Zone"
- Set up temporary or permanent berms and drainage ditches to control flooding
- Identify proximity of electrical ground transformer, above ground gas lines, electrical poles and service entrances to flood areas and be ready to take precautions to divert water or turn off the utility



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- Monitor any outside chemical storage and take precautions as needed
- When cleaning up after a flood, consider water and soil pollution and wear appropriate PPE.
- 6.4.6 Other Weather Related Emergencies

Each facility should evaluate past weather-related emergencies to identify conditions and issues that should be planned for in the future. Site-specific plans may be necessary.

6.5 Workplace Violence, Civil Unrest, Bomb Threats

Crisis Management Plan - These issues are addressed in Branscome's Crisis Management Plan and should be reviewed on an annual basis with all employees.

- 7.0 Emergency Response Training
 - 7.1 Training Several types of emergency response training are required by OSHA as well as best practice of the industry. The following types applicable to Branscome facility exposures include:
 - First Aid/CPR with Bloodborne Pathogens Program information
 - Fire Extinguisher Use
 - Confined Space Rescue
 - Chemical Spill Response
 - 7.2 Skills Drills All emergency response training should include appropriate "hands on" training and skills drills.

Some drills, such as for confined space and fall rescue should include the local emergency services department.

- 7.3 Retraining Employees will receive retraining on a regularly scheduled basis. Individuals who do not respond correctly during an emergency or who do not appear to have retained their training shall receive retraining.
- 7.4 Records Retention The Safety Specialist will retain documentation of all emergency response training and will make sure that documentation is also passed on to the Director of Safety.
- 7.5 Training records should be retained for 6 years.



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8.0 Program Review and Documentation

8.1 The Emergency Preparedness Program shall be reviewed at least annually. The program shall be modified as required.

9.0 Document History

Number	Effective Date		Author
Original	January, 2012		Alvin Trotman
Revision 1	August, 2013	Program review and Correction of Typo's	Alvin Trotman
Revision 2	April, 2014	General Review	Alvin Trotman