EMERGENCY ACTION PLAN

for

Harcros Chemicals Inc.

St. Paul Site

584 North Fairview Ave

St. Paul, MN 55104

651-647-0149

4/10/2019



Document Number 008.EAP Rev. 01



EMERGENCY ACTION PLAN

EAP No.: 008.EAP

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1. INTRODUCTION

This plan addresses the requirements for an Emergency Action Plan (EAP) at the *ST. PAUL SITE* in accordance with the Occupational Safety and Health Administration (OSHA) emergency planning requirements for general industry [29 CFR 1910.38(a)].

Harcros Employees making deliveries to customers or holding meetings with the customers at their location shall follow the customer's emergency procedures.

2. SCOPE

This plan applies to all employees who work at the *ST. PAUL SITE* and covers the OSHA requirements and applicable EPA Integrated Contingency Plan annexes:

- Pre-emergency planning
- Coordination with outside emergency response agencies
- Procedures for reporting emergencies
- Procedures for emergency evacuation, accountability, and assembly points
- Procedures for medical and rescue
- Name or job titles of Employees to contact for detailed plan information
- Alarm system to alert workers

This plan consolidates all regulatory requirements, including overlapping elements, for emergency response into one functional plan.

3. **DEFINITIONS**

The following are definitions of terms associated with this plan.

Term	Description
Two Person Rule	A system of organizing Employees into work groups in such a manner that each Employee of the work group is designated to be observed by at least one other Employee in the work group. The purpose of the two person rule is to provide rapid assistance to Employees in the event of an emergency.
Clean-Up Operation	An operation where hazardous substances are removed, contained, neutralized, destabilized, cleaned or in any other manner processed or handled with the ultimate goal of making the site safer for Employees and the environment.
Control Center (Incident Command)	During an emergency, the control center is the location where Incident Command and Emergency Response from outside agencies manage communication and cleanup response actions. The Assembly Area is the Site Control Center and Incident Command. For weather inside shelter emergencies, the Control Center is the Training Room.



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Term	Description
Designated Assembly Area	An assigned area for Employees to congregate in the event of evacuation. The area is used to determine missing and extra personnel for personnel accountability purposes and to ensure the safety of Employees.
Emergency Response	A response effort by outside designated responders, such as the Fire Department, to an occurrence which results, or is likely to result, in an uncontrolled release of a hazardous substance. All emergency response agencies or personnel (i.e., Fire department, PIER hazmat, police, bomb squad, etc.) shall check-in.
Roll-Call Person	This person may be the, Supervisor or Lead designated to take attendance, reporting missing to the Incident Command. When it is clear to return to the plant, the Incident Command notifies the roll-call person who in turn notifies the Employees in the assembly areas.

4. RESPONSIBILITY

4.1. Employee

Employee is a Harcros person whose job requires him/her to conduct work at the *ST. PAUL SITE*. The Employee shall follow this Emergency Action Plan. The Employee shall be familiar with exit routes within the *ST. PAUL SITE*. The Employee observes and reports problems, such as smoke, unusual odor, chemical spills, fire, etc. to their immediate Supervisor or member of management. When instructed or if an alarm sounds, the Employee exits the plant or building in an orderly fashion and reports to the assigned assembly area.

4.2. Emergency Coordinator/Supervisor

This person is responsible for instructing Employees on the location of the escape routes, exits and emergency exit doors, fire safety and evacuation procedures. This person knows what actions to take when an emergency alarm is sounded. Ensure accountability at the Assembly Area and notifies the emergency response agency or fire department that all persons are accounted for prior to their appearance at the site. This person directs company resources to account for all site personnel, contractors and visitors, and may coordinate with outside Public Emergency Response Personnel as they arrive to address the emergency. They shall keep nonessential personnel off of the site to minimize persons in the path of danger. They shall refer all media requests to the Harcros Media Coordinator. Finally, they will train all contractors on the applicable provisions of the EAP. The site supervisor is also responsible for reviewing the applicable sections of this EAP with contractors.

5. EMERGENCY PREPARATION AND RESPONSE

This plan identifies the most likely emergency events that could occur and the response actions are described in each section. An emergency may be a fire, process upset, chemical release, weather condition, flood, bomb threat, security intrusion event, power loss, lightning, pandemic, water main rupture, or any similar incident.



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In general, for all non-life threatening emergency situations that occur in the work area, the Employee shall contact the immediate Supervisor or member of management and describe the situation. Branch management will determine what response actions to take. For life threatening emergencies dial 911 first.

Communication systems to be used for internal and external communications during an emergency exist at the facility that includes *an intercom system, fire alarms, and as a back-up system, personal cell phones and air horns*. Employees that are not directly involved in emergency response activities should remain off of the telephone system.

All Safety Data Sheets (SDS) are maintained electronically on file in the Product Code Database. Paper copies are located in the front office, 4 drawer black filing cabinet. Copies of the SDS are provided to the emergency response agencies as necessary.

6. EMERGENCY PREPARATION AND RESPONSE

The alarm tones and announcements are as follows:

- 1. The fire pull station will be used whenever evacuation is necessary due to fire or chemical spill.
- 2. During severe weather such as tornadoes, floods or earthquakes, the intercom system or air horn is used.
- 3. 911 will always be called in case of a life threatening emergency.

7. EMERGENCY RECOGNITION AND RESPONSE

7.1. Assembly Areas

The following are the assembly areas during an emergency evacuation. Once the alarm has been activated, employees shall report to their assigned Assembly Area or the nearest Assembly Area if working outside of their normally assigned work area.

1	EMERGENCY COORDINATORS LIST PRIMARY AND SECONDARY		INDOOR SHELTER AREA	OUTDOOR ASSEMBLY AREA Primary Secondary	
Warehouse ((P)	Craig Mader John Hajduk	Training Room	West gate at Fairview Avenue	East Gate at Wheeler Street

Should the area be compromised by the emergency, Emergency Coordinators shall inform personnel where to relocate.



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7.2. List of Emergency Coordinators

Designated Emergency Coordinators include:

Building	Primary	Secondary	Alternate
Facility	Craig Mader	John Hajduk	Yee Yang
	14658 Sherwood Pl	23644 Logan Way,	2777 Hadley Ave N,
	Burnsville, MN 55306	Lakeville, MN 55044	Oakdale, MN 55128
	M: (651)-295-1895	M: 612-805-6837	M: 651-399-9856

MEDIA COORDINATOR

The Media Coordinator shall manage the dissemination of information outside the company. All requests for information by the media shall be directed to the media coordinator.

Refer to the SOP Handling Media Inquiries - 15.000, for contact information of media coordinators and additional instructions.

8. ENVIRONMENTAL COORDINATOR

The Environmental Coordinator shall be responsible to ensure compliance with environmental statutes and regulations.

The Environmental Coordinator includes:

Primary Environmental Coordinator	Alternate Environmental Coordinator
Ryan Doyle	Kevin Roepe
Cell 816-813-4799	Cell 660-909-4947

9. HOSPITALS AND OTHER MEDICAL FACILITIES

9.1. Hospital:

Regions Hospital, 640 Jackson St., St. Paul MN (651) 254-3456

9.2. Occupational Medicine Clinic:

MedExpress, 1963 Robert St S, West St. Paul MN, 55118 (651) 647-2628

North Memorial Clinic, 1835 West County Rd C, Roseville, MN 55113, (763) 581-0340

9.3. Ambulance

Dial 911 for emergency medical assistance



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10. EMERGENCY EQUIPMENT ON SITE

Emergency equipment, first aid cabinets and absorbent material are available throughout the site for use. These locations are indicated on Appendix A. The Supervisor/Manager reviews the nearest location of the emergency equipment with the Employees in their work area.

Secondary Containment pallets are part of the spill response kit depicted in Appendix A. These containment pallets are tested annually to ensure they are watertight. In addition the flammable storage room has adequate secondary containment built into the building structure and are visually inspected annually.

11. CHEMICAL SPILL NOTIFICATIONS

When Emergency Response is required to control or cleanup chemical spills, contact:

Pier at 877 PIER NOW - (877-743-7669)

PIER personnel will connect employees to an emergency response contractor.

Production employees who are HAZWOPER trained will assess the situation and make a determination as to the appropriate action.

Important environmental reporting requirements and telephone numbers

If it is determined to be a Reportable Release, notification must be made. Record the exact time the call was made on an incident form.

Note: Notification must be made within 15 minutes of the release.

- Notify local emergency responders at 911 (if needed), Fire (651-224-7371), Police (651-291-1111)
- Notify Federal Authorities (National Response Center) at (800)-424-8802
- Notify State Emergency Response Commission at (651)-649-5451
- Notify the LEPC (Local Emergency Planning Committee) at Gary Peterson (763) 441-2896
- For non-reportable quantity releases, notify local authorities if the release could affect property or people offsite.

Other Important Telephone Numbers

CHEMTREC (For incidents involving non-Harcros transportation equipment) call (800)-424-9300.

Note: The information above is posted throughout the facility



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12. EVACUATION

The following are the steps during an emergency evacuation. When an emergency situation exists, any Harcros Employee may activate the alarms as needed.

Evacuation routes are shown on the maps in the Appendices of this plan.

Employee activates the alarm: The alarm tones and announcements are as follows:

CALL 911!



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Step	Picture
4. Employees evacuate or shelter-in-place when the alarm blast sounds or notified by their Supervisor. Employees need to make sure that visitors and contractors also evacuate or shelter-in-place, depending on the emergency situation. Note: An employee will always escort and be responsible for a person with disabilities.	
5. Employees report to the assigned outdoor assembly area.	
6. Employees should know the primary and secondary exit routes from all areas of the site (See Appendix A).	REFER TO APPENDIX A
	EVACUATION ROUTES ASSEMBLE AT WEST GATE ON FAIRVIEW AVE. WARRENDE JOHN SEE WARRENDE JO
7. Employees shall remain calm and not run when evacuating the site. Watch for emergency vehicles.	
8. Employees should assist others to evacuate as necessary.	



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- 9. Employee shall give their name or reply when called by the Emergency Coordinator.
- 10. The Emergency Coordinator takes attendance and reports the accountability to the 911 call to inform the Fire Department or Emergency Response Agency that all persons are accounted for prior to entering the site.
- 11. Employees remain in the Assembly Area until the "ALL CLEAR" is given to proceed back into the site.



13. FIRE

The following are the steps for emergency situations involving a fire.

Step	Picture
1. Dial 911, sound alarm and report the incident to the emergency operator. Provide the emergency operator with the location of the incident (physical address and site within the facility).	SCALL 911!
Report the emergency to supervisor/emergency coordinator.	9 1 1
3. If the fire is small (office waste basket size), Employees that feel they have the knowledge and are comfortable to use a portable fire extinguisher may extinguish the fire.	



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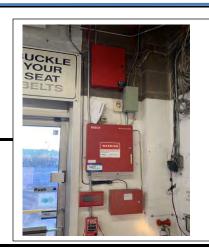
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4. If the fire is greater than the office
waste basket size, the Employee
activates the fire and reports the
fire location to their
Supervisor/emergency coordinator,
and evacuates the building.

5. Follow the steps for evacuation in Section 12 of this plan.



14. WEATHER (TORNADO, NATURAL DISASTER)

The following are the steps for emergency situations involving a tornado or natural disaster.

Note: Local tornado sirens may be activated by the local emergency jurisdiction. If the siren is activated, Employees shall go to the tornado shelter areas in the facility.

Step	Picture
The office monitors weather conditions with weather applications on cell phones. When a tornado or natural disaster has been sighted and announcement received by radio, the office notifies the Emergency Coordinator. Management personnel shall evaluate the situation and determine the appropriate actions to take.	7.49 1-23°C 1-23°C 1-23°C 1-23°C 1-23°C 1-23°C 1-23°C 1-23°C
2. If the Employee observes an emergency situation (rising water levels, extreme winds, large hail, heavy snow loads, etc.), the Employee shall contact their Supervisor or member of management and report the conditions that may create an emergency situation.	FRI 424°C
3. Report the emergency to supervisor.	



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4. The Employee or Supervisor shall notify personnel to shelter in place by intercom or air horn.



5. All Employees report to the nearest designated indoor shelter area (See Appendix A) and stay away from windows, exterior doors, and skylights.

Note: The Shelter-in-Place command pertains to all employees, customers, clients, contractors, and visitors. When directions to Shelter-In-Place are provided, everyone should take those steps immediately. Do not leave the facility or attempt to drive.

- 6. All Employees shall remain in the shelter areas until the "ALL CLEAR" is heard.
- 7. Once the all clear is heard, Employees shall report back to their work areas.

15. MAJOR SNOW OR ICE STORM

The following are the steps for emergency situations involving a major snow or ice storm.

Step	Picture
The Employee shall check local news for road closures before going to work. For Employees already at work, Harcros will determine whether shutdown and Employees should return to their homes due to inclement weather.	
If at work and weather gets worse, Management notifies the Supervisors/Managers whether the facility is closing due to inclement weather and whether Employees may leave work.	



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16. FLOOD

The following are the steps for emergency situations involving a major flood disaster.

Step		Picture
1.	The office monitors weather conditions with weather applications on personal phones. The office shall notify management personnel of potential flooding. Emergency alerts on cellular phones are received and communicated by management personnel to the Employees.	
2.	Listen for disaster sirens or warning signals in the area.	
Note	: Local authorities will direct persons to leave waters.	for a higher area or away from the pathway of rising
3.	Although most electrical outlets/receptacles are 12 inches or more above the floor elevation, the electrical power shall be turned off when there is extreme standing water and flooding within the site buildings >2 inches of continuous standing water.	

Note: If extension cords are in the area where flooding occurs, turn off the power. 4. If site evacuation is required, the utilities and natural gas valves shall be closed (See Appendix A). 5. Employees shall be directed to leave the area via their own vehicle to the area recommended by local authorities.



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17. LOSS OF ELECTRICAL POWER (LIGHTNING STRIKE, OUTAGES)

The following are the steps for emergency situations involving loss of electrical power and lightning strike.

Step	Picture
1. Electrical power may be lost during outages, severe thunderstorms, and lightning. When power is lost, Employees shall adjust their vision to loss of light and wait until the emergency backup lighting is activated before moving about. If emergency lighting does not activate, the Supervisor shall instruct the Employees where to wait for the power to be restored.	POWER OUTAGE
To ensure Employee safety, equipment shall not be operated in areas where there is no lighting during loss of power.	
Once power is restored, Employees check their work area before resetting and restarting machinery and equipment. Make sure that machinery has properly cycled.	

18. ELECTRICAL EMERGENCY (ELECTROCUTION)

The following are the steps for emergency situations involving electrocution.

Step	Picture
Harcros employees are not trained to rescue people from electrical emergencies. Dial 911 and report the incident to the emergency operator. Provide the emergency operator with the location of the incident (physical address and site within the facility).	CALL 911!
2. Contact Supervisor	



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19. BOMB AND OTHER THREATS OF VIOLENCE

The following are the steps for emergency situations involving bomb and other threats.

Step Picture

Caution: Do not use cell phones or two way radios, as they may set off a suspect device.

- 1. Bomb Threat is called in on the telephone:
 - a. If the Employee receives a bomb threat or other threat on the telephone, the Employee shall remain calm and record every word spoken by the person and use the telephone bomb threat checklist (Appendix B).
 - b. Get as much information as possible about the caller, including clues from background noises and record on the information.
 - c. After recording as much information as possible, the Employee shall contact the Supervisor/Manager and provide the information and description of the threat.
 - d. The Supervisor/Manager evaluates the situation. The Supervisor/Manager shall call 911 and Corporate Risk Management at 913-621-7826 as soon as possible.
 - e. The Employee and Supervisor/Manager shall remain available when law enforcement personnel arrive to provide information as necessary.
 - f. The Supervisor/Manager shall consult with the Police to determine the appropriate course of action and whether evacuation is required. If evacuation is required, follow the Evacuation steps in Section 12.







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Step		Picture
2. Wr	ritten Bomb Threat is received:	
a.	If the Employee receives a written bomb threat, the Employee shall avoid handling the note unnecessarily in order to preserve possible fingerprint(s), handwriting or typewriting, paper, and postal marks.	YOUR BUSINESS AND YOU WILL BE FIRE
b.	The Employee shall contact the Supervisor/Manager. In the absence of Management, the Employee shall call 911.	BOMBED IF U
c.	The Employee shall wait for further direction from the Emergency Coordinator or Management.	
sha Su _l Em	r other threats of violence, the Employee all contact the Supervisor/Manager. If the pervisor/Manager is not available, the aployee shall contact Human Resources at 3-621-7824.	

20. SUSPICIOUS OBJECT OR PACKAGE

The following are the steps for emergency situations involving a suspicious object or package.

I. If the Employee finds a suspicious object or package, the Employee shall remain calm and not disturb or move the object or package.	Picture	
Excessive postage Handwritten or poorly typed addresses Incorrect titles Title, but no name Misspellings of common words Oily stains, discoloration or odor No return address Excessive weight Lopsided or uneven envelope	Protruding wires or aluminum foil Excessive security material such as masking tape, string, etc. Visual distractions Ticking sound Marked with restrictive endorsements, such as "Personal" or "Confidential" Shows a city or state in the postmark that does not match the return address	



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2. The Employee shall contact the Supervisor/Manager and clear all persons from the immediate vicinity.

- 3. The Supervisor/Manager shall evaluate the situation and call the Site Safety Manager and 911.
- 5. The Supervisor/Manager shall consult with the Police to determine the appropriate course of action and whether evacuation is required. If evacuation is required, follow the Evacuation steps in section 12.

NATURAL GAS LEAK 21.

The following are the steps for emergency situations involving a natural gas leak.

Step **Picture** 1. If the Employee suspects a gas leak within the building or work area, the Employee shall leave the area immediately and contact the Supervisor/Manager. The Employee shall report the exact location of the suspect leak to their Supervisor/Manager. 2. The Supervisor/Manager evaluates the situation to determine if there is a gas leak in the building. If a gas leak is confirmed and cannot be corrected in a timely manner, the Supervisor/Manager shall pull the evacuation alarm. Employees shall follow Section 14 for emergency evacuation. 3. Supervisor/Manager or Site Safety Manager shall notify the *Excel Energy* Management Gas Emergency or Outage shall consult with Gas Utility to determine if If you've detected a gas leak, please move a safe further actions are required. distance away before calling for help. 911 in an emergency 800-895-2999 to report an outage 4. Employees return to their work area after the "ALL CLEAR" is announced.



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22. CHEMICAL SPILL

The following are the steps for emergency situations involving a chemical spill and releases. For large chemical spills or highly hazardous chemical releases such as chlorine or flammables that are determined to be beyond HAZWOPER training capabilities, the Employee shall evacuate and follow Section 12 of this plan.

Step Picture

Warning: Never attempt to clean up a spill unless you are familiar with the properties of the product and have been trained to use the proper PPE and other cleanup equipment (i.e., HAZWOPER trained).

- 1. If the Employee observes a chemical spill, the Employee makes notifications according to section 11 of this plan and evacuates if necessary per section 12.
- 2. The Employee shall notify the Supervisor/Manager of the spill with the product name, quantity spilled, and product code if applicable.
- 3. The Supervisor will evaluate the situation and determine the appropriate actions to be taken, including if site evacuation is necessary, the reportable quantity is exceeded, and whether notification to regulatory authorities is required.



23. Spill Prevention, Control and Countermeasure Plan (SPCC)

All chemical spills that consist of petroleum, oil, and lubricants are managed under the site's SPCC in accordance with EPA spill prevention and control requirements [40 CFR 112]. A copy of this plan can be found in the manager's office. For questions regarding the plan, contact the Corporate Environmental Office at 913-621-7716.



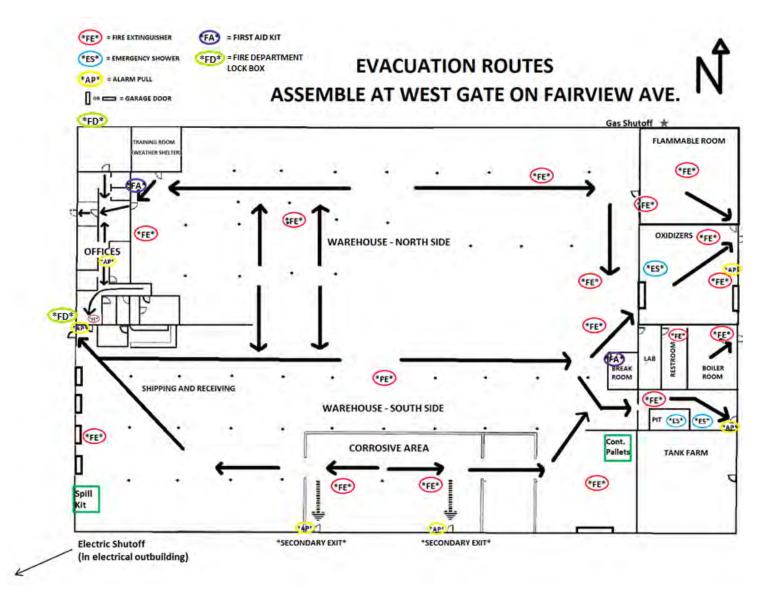
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24. Appendix A – Building Locations





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25. Appendix B – Bomb Threat Checklist

C	Bureau of Alcohol, Tol		Slurred	☐ Whispered	
.65	BOMB THREAT	CHECKLIST	Ragged	☐ Clearing Throat	
1. When is the bomb going to explode?		Deep Breathing	☐ Cracking Voice		
2. Where is the bomb right now?		☐ Disguised	☐ Accent		
3. What does the bomb look like?		Familiar (If voice is familiar, who did it sound			
4.	What kind of bomb is it?		like?)		
5.	What will cause the bomb to	explode?	BAC	CKGROUND SOUNDS:	
6.	Did you place the bomb?		⊠ Street noises	☐ Factory machinery	
7.	Why?		☐ Voices	☐ Crockery	
8.	What is address?		☐ Animal noises	☐ Clear	
9.	What is your name?		☐ PA System	☐ Static	
	EXACT WORDING OF B	OMB THREAT:	☐ Music	☐ House noises	
			☐ Long distance	☐ Local	
			☐ Motor	Office machinery	
			Booth	Other (Please specify)	
		_			
		-	ВОМЕ	B THREAT LANGUAGE:	
Sex of caller: Race:		☐ Well spoken (education) ☐ Incoherent			
Age: Length of call:		☐ Foul	☐ Message read by threat maker		
Tele	phone number at which call is	nich call is received:			
Tim	e call received:		REMARKS:		
Date	e call received:				
	CALLER'S	VOICE	Your name:		
☐ Calm ☐ Nasal		Your position:			
	☐ Soft	☐ Angry	-		
	☐ Stutter	Loud	Your telephone nur	mber:	
	☐ Excited	Lisp	Date checklist comp	nlated:	
	☐ Laughter	Slow	Date checkist com	picteu	
	☐ Rasp	☐ Crying			
	☐ Rapid	□ Deep			
	☐ Normal	☐ Distinct			
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26. REVISION HISTORY

Revision number	Reason for revision	Originator	Department	Date
01	New EAP Format	Kevin Roepe	794	4/10/2019