



January 2, 2020

Legislative Hearing Officer
Saint Paul City Council
310 City Hall, 15 W. Kellogg Blvd
Saint Paul, MN 55102

Subject: Emergency Management Plan

Per the City of Saint Paul letter dated 12/18/2019 regarding resolution to our appeal of the Fire Inspection Correction Notice, Harcros Chemicals Inc. is submitting this Emergency Management Plan. The Emergency Management Plan at 584 North Fairview Ave is a compilation of the following documents, plans, and inspections.

- Emergency Action Plan: This document outlines the emergency procedures that employees and visitors will take in emergency situations to include fire emergencies, chemical spills, natural disasters, etc. This document is attached as Enclosure A.
- Fire Prevention Plan: This document outlines the measures that Harcros takes to prevent, mitigate and protect the facility from fire emergencies. This document is attached as Enclosure B.
- Spill Prevention, Control, and Countermeasures Plan: This document describes the controls and response measures taken to prevent and respond to spills of oil products. This document is attached as Enclosure C.

In addition to these written plans in which employees are trained annually, Harcros is taking additional measures to ensure that employees and emergency responders are protected and aware of the hazards associated with storage of hazardous chemicals at the facility.

- Physical separation of hazardous materials is used to reduce risk of fire or incompatible mixing. All flammables classes I, II and IIIA are stored in a sprinkler protected flammable storage room with heat actuated closing fire doors. Class IIIB combustibles will be kept under the MAQ within the main warehouse area. Oxidizers are only stored in the oxidizer storage room and are separated from flammables and combustibles. Liquid corrosives are stored within a curbed area with adequate secondary containment to contain any spills.
- Annually the facility submits Tier II reports to the Fire Department and the Homeland Security and Emergency Management (HSEM) Division within the Minnesota Department of Public Safety. Tier II reports indicate the quantities as well as physical and health hazards of hazardous materials stored at the facility. The Tier II report for 2019 will be submitted by March 1, 2020.
- Safety Data Sheets are available for all products stored in the warehouse.
- The facility has employees that are HAZWOPER trained and can respond to releases of hazardous materials.
- The facility has a manager who actively participates in the HSEM Regional Review Committee for the St. Paul area.
- Harcros uses a management of change system to capture and manage change within the organization to ensure hazards are identified and addressed during changes in equipment, personnel or procedures.
- Monthly the site conducts Safety and Security Inspections which include inspecting the following items:

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- Fire extinguishers are charged
- Emergency phone numbers are posted
- Evacuation routes are posted
- Exits are marked
- Emergency lighting is tested
- First Aid kits are serviceable
- Electrical panels, cords, and equipment is serviceable
- Chemical storage is adhering to segregation requirements
- Flammable room's sprinkler system inspection is current
- Secondary containment is intact and adequate
- Products containing oil are in good shape and not leaking

If you have any questions or concerns, please contact Kevin Roepe at 913-621-7716 or at kevin.roepe@harcros.com.

Sincerely,

HARCROS CHEMICALS INC

Kevin Roepe
Compliance Manager

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