

DAMON INDUSTRIES, INC.

**EMERGENCY
ACTION
PLAN**

Emergency Plan and Procedures



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PHONE NUMBERS OF CONTACTS

Amy Damon, PresidentHome (330) 829-0783
..... Cell (330) 206-7201
.....Alliance OH

Bob Brumbaugh, Vice President (330) 633-5634
..... Tallmadge OH

Deb Martin, Vice President, Administrative (330) 823-7996
..... Alliance OH

Taylor Jones, Chemist (330) 324-1281
..... Alliance OH

Willie Davis, Warehouse Manager (330) 823-6890
..... Alliance OH

Ken Hacker, Building/Service Manager..... (330) 493-8425
..... Canton OH

Daryl Culler, Production Manager (330) 537-3404
.....Damascus OH

EMERGENCY PHONE NUMBERS

Emergency # in Alliance area.....911

Lexington Township Fire Department (330) 821-3333
..... Alliance OH

Emergency Management, Inc. (405) 282-8510
(Spill response)

Stark County Sheriff (330) 430-3800
..... Canton OH

Environmental Protection Agency (440) 425-9171
..... Twinsburg OH

EMERGENCY ACTION PLAN

PURPOSE

The purpose of this plan is to detail the basic steps needed to prepare for emergencies in the workplace. The preservation of life is of paramount importance to Damon Industries, Inc., and it is company policy to err on the side of protecting employees and customers if there is a question. The emergencies may include fire, tornado or other severe weather, chemical spill or release, earthquake, neighborhood event (derailment, explosion, chemical release), or bomb threat.

The highest priority of this plan is to ensure the health and safety of all staff, customers, and visitors in the event of an emergency. The procedures set down in this plan will be communicated to all employees and to customers and frequenters who are in this facility. Any changes to this plan will be communicated to all affected employees as soon as it is made.

SCOPE

This plan applies to all staff, customers, visitors, drivers, and outside contractors at Damon Industries, Inc.

EMERGENCY EVACUATION

In the event the emergency requires an evacuation of the facility, Damon Industries, Inc. will follow the provisions of this Emergency Evacuation Plan.

Emergency escape routes are established. Floor plans clearly showing designated routes and refuge (safe) areas are identified. These floor plans are strategically located throughout each department and included in Damon Industries, Inc. Emergency Action Plan (EAP) a copy of which is provided to each employee. There are two types: one for general evacuation, the other for tornado shelter.

Evacuation teams have been established with team captains. Listed below is a table indicating teams, their members, and the name of each team's captain. In the event of an evacuation, each employee is to exit the building in an orderly fashion and report immediately to his/her team captain at the southeast corner of the property -- the corner of Rockhill NE and Commerce Street near the Damon Shipping and Receiving sign. Team captains will report to Ken Hacker who is accounted for and who is not.

The names at the top of the lists are the team captains. In the event of their absences, the second name on the list is the captain. It is each employee's responsibility to know who he/she is to report to. It is each captain's responsibility to know which employees are to report to him/her.

Ken Hacker

Brent

Denise
Taylor
Paulette
Diane H
Sue
Diane W

Willie

John L
Terry
Tony
Mike
Cory
LTL Carriers
UPS, RPS, etc

Daryl

Archie
Jeremy
Josh

Dan

Manuel
Brandon
Jim
Bill Carr

Kim

Terrie
Bob
Deb
Amy
Scott
Keith
SIs Managers
SIs People
Ken Damon
Visitors

The key to the success of an evacuation is knowing who is in the building. The people most difficult to keep track of are those who are not in the building on a regularly scheduled basis. In an effort to help us do so, we request the following:

1. If you are in the building and you usually are not, let the receptionist know you are here. Then when you leave, let her know you have left the premises.
2. If you are usually in the building and you have an appointment away from the building, tell your supervisor you are leaving and approximately how long you will be gone. When you return, tell your supervisor you are back. In the event your supervisor is not in, tell a person with whom you work closely.

All visitors to the Damon facility will sign in at the reception desk upon entering the building and sign out when they leave. This includes personnel who enter through the front of the building. For example, sales reps, service personnel for copier, computers, etc. It is up to each person they are visiting to ask them "if they checked in with the receptionist". If they did not, then take them back out and explain that from now on, they must sign in for their own safety. Visitors and drivers who enter through the plant or shipping department are to be accounted for by the warehouse manager.

CRITICAL FACILITY OPERATIONS

If at all possible, systematic operational shutdown is required for critical machines and processes. The most critical are:

- To shut off the power to the building.
The Main Breaker for all of the electric in the building is located on the north wall of the old production department in the plant--Near the battery charging units.
- To shut off the gas.
The shut offs for the gas lines are located outside Amy Damon's office near the sales entrance on the northeast side of the building. There are two lines, one for our well and the other belongs to Columbia Gas. The valves that are painted white should be shut off first. The yellow valves should be shut off secondly, or in the event the first two cannot be shut off.
- To shut off the filling machine.
The filling machine in the production department should be shut off at box #5 in the production department. Box #5 is located on the wall to the right of the fire door as you enter from the old warehouse into the new warehouse.

RESCUE AND MEDICAL DUTIES

No employees shall attempt an emergency rescue. Attempts to rescue anyone trapped in the facility will be done by fire department/emergency rescue personnel only. No employee shall reenter the facility until told to do so by both management and the fire department.

Employees who are certified in first-aid and CPR may assist injured personnel until medical help arrives. Employees who **are not** certified in either First Aid or CPR **will not administer this assistance!**

REPORTING EMERGENCIES

Emergency reporting procedures should be followed as outlined in the Emergency Evacuation Procedures of the Emergency Action Plan. A list of emergency contacts and phone numbers will be posted near each telephone in each Department.

EMERGENCY ACTION PLAN (EAP) COORDINATOR

Deb Martin is the designated EAP Coordinator at Damon Industries, Inc., and will be the contact for further information and explanation of duties under the plan. In the event of her absence, Ken Hacker is the next designated, followed by Amy Damon and then Bob Brumbaugh. Ken Hacker is in charge of all evacuations. In his absence, Willie Davis will be in charge.

The EAP coordinator will insure all training that is conducted will be documented, and that refresher training will be conducted as deemed necessary or when the plan has been revised.

TRAINING AND DRILLS

All employees and managers who are in the building on a regular basis will be instructed in the following:

1. Emergency Action Plan
2. Emergency Evacuation Procedures
3. Facility Alarm Systems
4. Emergency Reporting Procedures
5. Types of potential Emergencies
6. Use of fire extinguishers

The instruction will be provided as follows:

1. Initially when the plan is developed
2. To all new employees
3. When procedures are updated or revised
4. Refresher instruction will be provided when needed

A drill will be held for all personnel to verify understanding of the emergency procedures, with an evaluation of performance made immediately by management and employees. When possible, a drill will include representatives of outside services such as fire, emergency medical, and police departments.

EMERGENCY ACTION PLAN REVIEW

The EAP shall be reviewed on an annual basis by the plan coordinator and at least three selected employees.

EMERGENCY EVACUATION PROCEDURE

PURPOSE

To establish a plan of action which ensures a rapid and orderly evacuation of all personnel in the event of an emergency, such as fire, tornado or other severe weather, chemical spill or release, neighbor facility emergency, derailment or motor vehicle accident, or bomb threat. The highest priority of this procedure is the safety and health of all personnel at or near the facility.

Specific attention must be paid to evacuation of any handicapped from the building. This procedure is designed to enhance the effective response to an emergency.

EVACUATION CONDITIONS

Conditions which threaten the safety and health of personnel and may require the evacuation of the facility can occur as the result of an emergency inside the facility or from a situation outside. These may include, but are not necessarily limited to, fire, explosion, hazardous material spill, flammable gas leak, structural collapse, bomb threat, natural disaster, power outage, and severe weather.

The level of risk present within the facility must be compared with the level of risk existing outside the facility (i.e. severe weather) when considering evacuation.

AUTHORITY TO ORDER AN EVACUATION

The authority to order any type of evacuation rests with any upper management or any department manager if they deem there is not time to consult with upper management. The most senior authority individual will direct designated persons to carry out procedures for evacuating the handicapped in accordance with a pre-determined plan of action, coordinated with local fire and rescue officials.

EVACUATION PROCEDURES

Any individual discovering a situation which presents a real or potential threat to the safety and health of personnel within the facility shall immediately sound the alarm. If a fire exists, or the emergency requires a complete evacuation of the facilities, announce over the Paging System and notify the most senior authority individual of the event. If time permits and the most senior authority individual can safely do so, she/he will announce the situation repeatedly over the public address system.

To use the Pager System for evacuation, press #3101 on the phone. Allow the ringer to ring to whoop six times. Hit the release key, and push the page button on the phone. The following announcement should be made:

"This is an emergency. Please evacuate the premises immediately."

In the event the phone system is down, use the air horns located in each department. As one department hears the horn sound, the next department should use their air horn. Air horns are located in the desk areas of each of the departments: service, production, warehouse, and office.

When the announcement is heard (or the air horns are heard), all personnel will immediately discontinue activities and proceed to the nearest exit. **Do not linger, or attempt to collect personal items before vacating the building.** Those personnel designated to assist the handicapped will do so. Once outside of the structure, go directly to designated assembly points and report to the Your team captain who will then report the presence of his/her team to Ken Hacker.

*****PRIMARY ASSEMBLY POINT - Southeast corner of the property, at Rockhill NE and Commerce Street, by the Damon Shipping and Receiving sign.*****

Alternate assembly point - The parking lot of Alliance Steel Products across the street.

Ken Hacker (or Willie Davis) will determine that all personnel are accounted for and have evacuated the building. He will also be prepared to brief arriving fire and rescue services on the problem; accountability of personnel; or if personnel are not accounted for, their possible location. MSDS are located in the sales department, the lab, and the production department in the plant.

Any employee who has a visitor, i.e., sales representative, vendor, etc., will be responsible to ensure the visitor is safely evacuated. The employee will make sure that the receptionist has been advised. Contract liaison personnel will be responsible for any contractor employee which is on the premises at the time of the event. The shipping department will be responsible for all drivers on the premises who are picking up loads.

All personnel will remain at the assembly point until they receive further instructions from upper management and Fire/Emergency Rescue Personnel.

MEDICAL DUTIES

Employees who are certified in First Aid and/or CPR may assist injured personnel until medical help arrives. Employees who **are not** certified in either First Aid or CPR **will not administer this assistance!**

CLEARING AN EVACUATION

No person shall return to an area that has been evacuated until instructed to do so by the most senior authority individual and the fire or police official at the scene.

HOW FIRES START

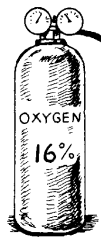
Fire is a chemical reaction involving rapid oxidation or burning of a fuel. Fire requires four elements to occur. If you remove any one of these facts, the fire cannot occur or will be extinguished if it was already burning.

Fuel



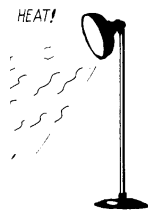
Fuel can be any combustible material -- solid, liquid, or gas. Most solids and liquids become a vapor or gas before they will burn.

Oxygen



The air we breathe is about 21 percent oxygen. Fire only needs an atmosphere with at least 16 percent oxygen.

Heat



Heat is the energy necessary to increase the temperature of the fuel to a point where sufficient vapors are given off for ignition to occur.

Chemical Reaction

A chain reaction can occur when the other three elements are present in the proper conditions and proportions. Fire occurs when this rapid oxidation, or burning takes place.

Take any one of these factors away, and the fire cannot occur or will be extinguished if it was already burning.

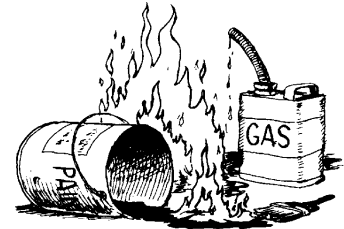
HOW FIRES ARE CLASSIFIED

Class A



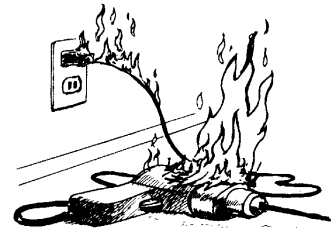
Ordinary combustibles or fibrous material, such as wood, paper, cloth, rubber, and some plastics.

Class B



Flammable or combustible liquids.

Class-C



Energized electrical equipment, such as appliances, switches, panel boxes and power tools.

Class-D



Certain combustible metals, such as magnesium, titanium, potassium and sodium. Explosive reactions can result from using common agents on Class D fires. Therefore, it is important to use the appropriate extinguishing agent for the type of metal that is burning.

HOW TO PREVENT FIRES

Class-A -- Ordinary combustibles:

- Keep storage and working areas free of trash.
- Place oily rags in covered container.

Class-B --Flammable liquids or gases:

- Do not refuel gasoline-powered equipment in a confined space, especially in the presence of an open flame such as a furnace or water heater.
- Do not refuel gasoline-powered equipment while it's hot.
- Keep flammable liquids stored in tightly closed, self-closing, spill-proof containers. Pour from storage drums only what you'll need.
- Store flammable liquids away from spark-producing sources.
- Use flammable liquids only in well-ventilated areas.

Class-C --Electrical equipment:

- Look for old wiring, worn insulation and broken electrical fittings. Report any hazardous condition to your supervisor.
- Prevent motors from overheating by keeping them clean and in good working order. A spark from a rough-running motor can ignite the oil and dust in it.

- Investigate any appliance or electrical equipment that smells strange. Unusual odors can be the first sign of fire.
- Do not overload wall outlets. Two outlets should have no more than two plugs.

WHEN NOT TO FIGHT A FIRE

Never fight a fire:

- If the fire is spreading beyond the spot where it started.
- If you cannot fight the fire with your back to an escape exit.
- If the fire can block your only escape.
- If you do not have adequate fire-fighting equipment.

In any of these situations, ***DO NOT FIGHT THE FIRE YOURSELF. CALL FOR HELP.***

HOW TO EXTINGUISH SMALL FIRES

Class-A Extinguish ordinary combustibles by cooling the material below its ignition temperature and soaking the fibers to prevent re-ignition. Use pressurized water, foam or multi-purpose dry chemical extinguishers.

Class-B Extinguish flammable liquids, greases or gases by removing the oxygen, preventing the vapors from reaching the ignition source or inhibiting the chemical chain reaction. Foam, carbon dioxide, ordinary dry chemical, multi-purpose dry chemical and halon extinguishers may be used to fight Class B fires.

Class-C Extinguish energized electrical equipment by using an extinguishing agent that is not capable of conducting electrical currents. Carbon dioxide, ordinary dry chemical, multi-purpose dry chemical and halon fire extinguishers* may be used to fight Class C fires. **DO NOT USE** water extinguishers on equipment.

*Even though halon is widely used, the EPA hopes to replace it with an agent that is less harmful to the environment.

Class-D Extinguish combustible metals such as magnesium, titanium, potassium and sodium with dry power extinguishing agents specially designated for the material involved. In most cases, they absorb the heat from the material, cooling it below its ignition temperature.

Multi-purpose chemical extinguishers leave a residue that can harm

8

sensitive equipment, such as computers and other electronic equipment. Carbon dioxide or halon extinguishers are preferred in these instances because they leave very little residue.

HOW TO IDENTIFY THE PROPER FIRE EXTINGUISHER

All ratings are shown on the extinguisher faceplate. Some extinguishers are marked with multiple ratings such as AB, BC and ABC. These Extinguishers are capable of putting out more than one class of fire.

Class-A and B

Extinguishers carry a numerical rating that indicates how large a fire an experienced person can safely put out with that extinguisher.

Class-C

Extinguishers have only a letter rating to indicate that the extinguishing agent will not conduct electrical current. Class C extinguishers must also carry a Class A or B rating.

Class-D

Extinguishers carry only a letter rating indicating their effectiveness on certain amounts of specific metals.

HOW TO USE A PORTABLE FIRE EXTINGUISHER

P Pull the pin.
A Aim Extinguisher nozzle at the base of the flames.
S Squeeze trigger while holding the extinguisher upright.
S Sweep the extinguisher from side to side, covering the area of the fire with extinguishing agent.

REMEMBER:

- Should your path of escape be threatened
- Should the extinguisher run out of agent
- Should the extinguisher prove to be ineffective
- Should you no longer be able to safely fight the fire

.....LEAVE THE AREA IMMEDIATELY!

HOW TO INSPECT YOUR FIRE EXTINGUISHERS

- Know the locations of your fire extinguishers.
- Make sure the class of the extinguisher is safe to use on fires likely to occur in the immediate area.
- Check the seal. Has the extinguisher been tampered with or used before?
- Look at the gauge and feel the weight. Is the extinguisher full? Does it need to be recharged?
- Make sure the pin, nozzle and nameplate are intact.
- Report any missing, empty or damaged fire extinguishers.

HOW TO EVACUATE A BURNING BUILDING

- The last one out of the room should not lock the door, just close it. Locking the door hinders the fire department's search and rescue efforts.
 - Proceed to the exit as outlined in the Emergency Action Plan.
 - Do not use elevators under any circumstances.
 - Stay low and avoid smoke and toxic gases. The best air is close to the floor, so crawl if you have to.
 - If possible, cover your mouth and nose with a damp cloth to help you breathe
- 9
- If you work in a building with multiple stories, a stairway will be your primary escape route.
- 8
- Once in the stairwell, proceed down to the first floor. Never go up.
 - Once outside the building, report to a predetermined area so that a head count can be taken.

WHAT TO DO IF TRAPPED IN A BURNING BUILDING

- If you're trying to escape a fire, never open a closed door without feeling it first. Use the back of your hand to prevent burning your palm. If the door is hot, try another exit. If none exists, seal the cracks around the door and vents with anything available.
- If trapped, look for a nearby phone and call the fire department, giving them your exact location.
- If breathing is difficult, try to ventilate the room, but do not wait for an emergency to discover that windows cannot be opened.

WHAT TO DO IF SOMEONE CATCHES ON FIRE

If you should catch on fire:

- STOP** - where you are
- DROP** - to the floor
- ROLL** - around on the floor.

This will smother the flames, possibly saving your life. Just remember to

STOP, DROP and ROLL.

If a co-worker catches on fire, smother the flames by grabbing a blanket or rug and wrapping them up in it. That could save them from serious burns or even death.

SUMMARY

Knowledge
Awareness
Preparation

These are your keys to preventing and surviving fires wherever they occur.

Tornado

Weather emergencies can strike at any time of year and any time of day. When weather conditions warrant, a radio in the office area will be tuned to a local weather station to monitor the situation. If a severe weather warning is issued, company operations will be evaluated by the senior management officer present to determine whether any operation should be canceled until the threatening weather has passed. During tornado season, whenever a tornado watch is issued, the radio will be turned on and monitored. If a tornado warning is issued, all operations will be shut down immediately and employees shall go to the nearest tornado shelter. Employees shall remain in the shelter area until told to return to work by management personnel. In the event of a tornado strike without adequate warning,

employees shall take cover wherever possible, preferably in interior rooms or under heavy equipment. See *Tornado Shelter map* included with EAP. After the tornado has passed, employees shall go to the assembly area at the southeast corner of the property, Rockhill NE and Commerce St. near the Shipping and Receiving sign. Management shall take a head count to determine the location and condition of all employees and visitors. If the building is damaged, electricity and gas will be shut down by designated maintenance personnel. See *Critical Facility Operations*. The fire department will be notified immediately in case of injury or failure to locate all personnel and visitors.

If a Warning is issued or if threatening weather approaches:

- Move to a pre-designated shelter. See Tornado Shelter map.
- Move to an interior room or hallway get under a sturdy piece of furniture if you cannot make it to a pre-designated area.
- Stay away from windows.
- Get out of automobiles.
- Do not try to outrun a tornado in your car; instead, leave it immediately.
- If caught outside, lie flat in a nearby ditch or depression. Look out for fallen electric lines.



Hazardous Material Spill or Release

Damon Industries will have employees respond only to incidental spills or releases. OSHA defines incidental response as - "where the substance can be absorbed, neutralized, or otherwise controlled at the time of release by employees in the immediate release area, or by maintenance personnel..." These responses are not considered to be emergency responses within the scope of the Hazardous Waste Operations and Emergency Response Standard - CFR 29, 1910.120.

This material follows and complies with OSHA CFR 29, 1910.120 (q) and complies with EPA Emergency Response requirements under SARA.

Responses to incidental spills or releases are covered by CFR 29, 1910.1200, the Hazard Communication standard and DOT Hazardous Materials standard.

Therefore the actual spill clean up procedures are the same as given on the MSDS and covered in the OSHA Hazcom, 1910.1200 training. Determination of which spills or releases are incidental and to be cleaned up by employees will be covered below.

The following types of spills have been determined to have a reasonable possibility of occurring.

- Flammable liquid & vapors
- Corrosive liquids
- Corrosive solids
- Poisonous gas or fumes

Determination of whether a spill is incidental or requires evacuation.

Things affecting the determination of whether a spill or release is incidental or not obviously include the nature and physical properties of the substance, but may also include the size of container (potential size of the spill), rate of flow of the material, location of the spill, number of personnel available, availability of proper personal protective equipment and the proximity of sources of ignition.

Spills that at first appear to be incidental, may in the course of mitigation become more serious and require evacuation.

Employees should never attempt to be "heroic", take calculated risks or attempt any spill response that they do not feel 100% competent and qualified to complete in total safety. Human safety is most important. Property protection, production schedules and fear of reprimand should never outweigh employee safety.

Most chemicals are of an irritating, mildly corrosive nature. Some are combustible liquids or flammable liquids with fairly high flash points. They can be handled as incidental spills in quantities up to the largest size container we use, 330 gallon totes. Specific policy on more the more hazardous chemicals is given below. This is in addition to MSDS information.

Methyl Ethyl Ketone and Isopropyl Alcohol - Small dripping leaks from large containers and trickling leaks from medium to small containers are incidental and may be handled by trained employees. Spills covering a few square feet are also incidental. Larger leaks or spills require immediate evacuation and calling of the fire department. If possible lift truck power and the power to the production department or area of the spill should be done while evacuating.

MEK and IPA should be immediately transferred to outside storage upon delivery and never left in any other location. All extremely flammable safety procedures should be followed.

Spills of Combustible Liquids are incidental unless a fire starts in which case evacuation is necessary. In the event of spills larger than a few square feet, all power must be cut off, adequate ventilation provided and use of respirators and other safety equipment used.

Hydrofluoric Acid Liquid - Dripping or trickling leaks are incidental if no more than 1 or 2 square feet of puddle exists. Respirators should be used along with other necessary PPE. More than a very small leak or spill requires evacuation.

Liquid Caustic Soda and Caustic Potash - In most cases they can be handled as incidental spills in quantities up to the largest size container we use unless a fire or chemical reaction occurs as a part of, or as a result of, the spill. These spills require strict attention to the use of personal safety equipment. The sewer should immediately be cut off if the spill will travel there. If caustic enters the sewer it could result in an explosion of steam. If caustic is already entering the sewer, evacuate the immediate area and have a manager assess the situation. When liquid caustics are being mixed, no one is allowed to work under the lift truck or the mixing tank. The operator should notify employees working in the area.

Bleach Concentrate - The largest container is a drum. Small to moderate leaks are incidental. Respirators must be used along with the necessary PPE. If bleach contacts acid and releases chlorine gas, immediate evacuation is necessary. If any fire exists as a result of the spill evacuation is necessary. If any yellow gas is seen or skin irritation noticed, this is not an incidental leak, evacuate immediately.

Chlorine Gas - This is very unlikely, but the possibility exists if bleach and acids combine. The presence of a yellow gas or the pungent smell, burning eyes, nose, throat or lungs indicate its presence and the need for evacuation. Bleach is to be stored away from acid materials and bleach containing products such as the LL laundry products are never to be manufactured or filled at the same time as acid products.

Aqua Ammonia - Small leaks or spills of a few square feet are incidental. They require use of a respirator in addition to the other necessary PPE. Moderate to large spills require evacuation.

Totes of corrosive chemicals should be stored and transported with the caps on and the cap only removed when in place over a tank. If there is a problem with the valve it will spill into the tank safely.

The whistles kept on the lift trucks can be used in any spill emergency to quickly summon help.

(q)(2)(i) - Pre-emergency Planning and Coordination with Outside Parties.

This plan has been developed as pre-emergency planning through meetings of the Damon Safety Team and management team. Safety measures have been co-coordinated with the Lexington Fire Department who have inspected the premises and made recommendations. The Stark County Emergency Planning Commission has been contacted, but have told us to work with the Fire Department.

We have contracted with Environmental Response Management Services to handle spills that are more serious than incidental. In the event of a flammable liquid or toxic gas spill both the Lexington Fire Department and Environmental Response are to be notified. In the event of a corrosive spill that does not affect anyone outside the spill area, but is too large or hazardous to be considered incidental, Environmental Response Management Services should be notified.

If hazardous material enters the sewer before it can be cut off, the Alliance Sewage Treatment Plant should be notified.

In the event any spill or release enters the environment or exceeds Threshold Reporting Quantities, the proper authorities should be contacted as soon as possible and within the stipulated time period. The senior management official on site shall see that this is taken care of.

(q)(2)(ii) - Personnel Roles, Lines of Authority, Training and Communication.

Only persons trained in handling hazardous materials shall be involved in responding to incidental spills or releases of hazardous material. These include production department personnel, the production department manager, the chemist and those in management who have chemical training and experience and/or have completed the OSHA 10 Hour Course which includes Hazard Communication, Hazardous Materials Handling and Storage and Hazardous Waster Operations Emergency Response Training.

Employees who are involved in or discover a hazardous chemical spill or release which appears to them to be of an incidental nature shall immediately notify the nearest manager. If the danger appears to be more than incidental and of a life threatening nature they shall immediately sound the evacuation alarm and notify a manager of the nature and location of the danger. Never go into a more dangerous area to sound the alarm or notify someone. Leave the danger area.

All management involved in operations are to receive an OSHA 10 Hour training course which includes Hazard Communication, Hazardous Materials Handling and Storage and Hazardous Waster Operations Emergency Response Training. All employees who handle or work with chemicals are to be trained in proper chemical handling, safe work practices, hazard communication and basic emergency response for incidental spills or releases. Training is to satisfy OSHA, DOT and EPA requirements. All employees are to receive Hazard Communication awareness training.

The senior management official on site who has hazmat training, or the one with the most appropriate experience, will be designated at the contact and coordinator with public emergency response official. This should be a person with knowledge of the chemical, storage, layout and other information needed.

(q)(2)(iii) - Emergency Recognition and Prevention.

Employees should always be alert for signs of a spill or release such as noticing leaking containers, puddles or odors where and when they should not be, or any health symptoms such as weakness, dizziness, light-headedness, blurred vision, teary eyes, shortness of breath, nausea, etc.

Spills or suspicion of spills should be reported to the supervisor or manager immediately.

Any conditions that appear unsafe or violate company policy should be reported to management immediately. These items should be followed up on immediately by the manager who is notified.

Upon notification of a hazardous chemical spill or release the manager should immediately evaluate whether it is an incidental and therefore internal event or whether evacuation and professional response is required.

If an evacuation alarm is sounded by an employee and the manager determines that the accident is actually an incidental spill or release he or she may immediately announce the situation on the public address system as follows and begin containment and clean-up.

“This is not an emergency requiring total evacuation. This is a small hazardous spill in the (location). Non essential employees stay clear and be alert.”

An incidental spill or release should as soon as safely possible be communicated to higher management so that they may assess the level of seriousness. If possible, more than one hazmat trained manager should confer and agree on whether the incident is actually incidental or requires evacuation and professional response.

Only the highest ranking hazmat trained official on site may give an all clear announcement to return to the work area whether an incidental release or evacuation.

(q)(2)(iv) - Safe Distances and Places of Refuge

(q)(2)(v) -Site Security and Control

In the event of evacuation the normal meeting place shall be the closest that employees come to the building until the senior management official and the fire department or other emergency responder gives an all clear. If emergency responders determine that a greater distance is necessary, all employees shall follow their orders.

In the event of an incidental spill or release, all employees not essential for containment and clean-up shall evacuate the immediate vicinity and remain at the distance the senior hazmat manager determines as the minimum safe distance.

(q)(2)(vi) -Evacuation Routes and Procedures

The procedures and routes outlines above and on the maps posted in each room shall be followed. Evacuation should always be away from danger so an alternate evacuation route should always be known.

If possible without a risk of personal safety the production manager or other production personnel should take the following steps before or as evacuating.

Shut off the sewer using the valve located on the north wall of the production room.

Shut off power to the production room at power box #5 by the fire door on the east wall.

Forklift operators should lower hazardous material loads and shut off power or at least shut off power if time is of the essence.

(q)(2)(vii) - Decontamination.

Containment and decontamination procedures should follow that recommended for the individual chemical. Employees should know what to do to contain each general type of spill without having to refer to the MSDS. Decontamination or clean-up should be done under the supervision of a hazmat trained manager and following the MSDS recommendations.

No spill clean-up should be attempted without the use of the proper Personal Protective Equipment.

In General, the spill absorbent pillows kept in the yellow spill response garbage cans should be used for all liquid spills. These are located at various convenient places and should be known to employees.

Soda ash should be used to absorb and contain acid and bleach spills.

Oil Dry should be used on caustic spills and flammable spills.

The chemist would usually direct clean-up of spills large enough to require neutralizing or hazardous waste disposal.

(q)(2)(viii) - Emergency Medical Treatment and First Aid.

In the event of chemical contact, follow the procedures given in the MSDS.

For eye contact begin flushing immediately and discontinue as the MSDS directs.

For skin contact, employee training should dictate how severe the danger is and what type of treatment is appropriate.

For inhalation the person should be moved to fresh air and if recovery is not rapid, the instructions on the MSDS should be followed.

Employees assisting others who have chemical contact should be careful not to contaminate themselves and should take appropriate measures if they are.

The policy given earlier in this plan should be followed regarding first aid and CPR to be given by employees.

(q)(2)(ix) - Emergency Alerting and Response Procedures - covered above.

(q)(2)(x) - Critique of Response and Follow-Up

All accidents, spills or release must be reported on the Accident response form. The Safety Coordinator or Safety Team Moderator will make sure that sufficient details are collected for discussion.

Serious accidents will be discussed by a meeting with all operations management and the involved employees to determine the cause, how the accident could have been avoided, how to avoid the accident in the future, whether corrective action should be taken with any employee or manager. Specific recommendations shall be assigned to the appropriate personnel and a manager assigned to ensure follow-up. The manager appointed will make a report to the other managers and to the next Safety Team meeting.

Less serious accidents will be discussed at the next scheduled Safety Team meeting. And the appropriate actions taken. The actions decide on will be followed up at the next regularly scheduled meeting or a special meeting if deemed appropriate.

(q)(2)(xi) - PPE and Emergency Equipment.

The PPE for all reasonably anticipated incidental spill or release containment and decontamination shall be kept at the production managers desk ready of immediate use. It shall be inspected monthly to be sure it is in good working order.

Spill absorbents and neutralizing chemicals shall be kept ready for use in appropriate location. They should be inspected monthly and replaced if necessary.

Emergency whistles, air horns and the code 444 paging alarm should be checked monthly and replaced or repaired as necessary.