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| | WHITETAIL SOLAR ENERGY CENTER | Version: 1.0 |
| | EMERGENCY RESPONSE PLAN | Issued: MMDDYY |

EMERGENCY RESPONSE PLAN – WHITETAIL SOLAR ENERGY CENTER

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LIST OF ACRONYMS AND ABBREVIATIONS

AED Automated External Defibrillator
WSEC Whitetail Solar Energy Center

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| CPR | Cardiopulmonary Resuscitation |
| CFR | Code of Federal Regulations |
| EC | Energy Center |
| EEE | Emergency Escape Equipment |
| EHS | Environmental, Health, and Safety |
| EPA | U.S. Environmental Protection Agency |
| ERP | Emergency Response Plan |
| Company | Invenergy Services LLC |
| SDS | Safety Data Sheet |
| MW | Megawatt |
| NRC | National Response Center |
| O&M | Operation and Maintenance |
| OSHA | Occupational Safety and Health Administration |
| PPE | Personal Protective Equipment |
| RQ | Reportable Quantity |
| SCBA | Self-Contained Breathing Apparatus |
| SPCC | Spill Prevention, Control, and Countermeasure |

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1. PURPOSE:

- 1.1. The following emergency response procedures are provided so that all White Tail Solar Energy Center (White Tail) personnel understand the practices that are to be followed to provide quick and effective response to emergencies that might arise at the facility. Because the safety of employees and the public is of primary concern, the White Tail O&M Manager and each member of the White Tail staff are committed to providing a safe, healthy work environment and are responsible for ensuring the implementation of these procedures.

2. APPLICABILITY:

- 2.1. White Tail Solar Energy Center O&M Manager and White Tail Solar Energy Center Staff.

3. REFERENCES:

- 3.1. [JHA – Inclement Weather \(Job Hazard Analysis\)](#)
- 3.2. [Procedure Fleet Operating Site Drills](#)
- 3.3. [Incident Reporting and Investigation Program](#)

4. INTRODUCTION:

4.1. Facility Description

- 4.1.1. White Tail is a proposed 150 MWac solar energy generating facility in Augusta and York Townships, Washtenaw County, Michigan. The Energy Center is comprised of 276,976 Maxeon, Performance SPR-P6-550-UPP and 37,896 First Solar, Series 6 Plus FS-6445-P combination solar panels.

Attachment 16.1 & 16.2 provides a site drawing of White Tail. Notification information for site and external support organizations (police, fire department, medical facilities, etc.) that may be called to respond to emergency situations at White Tail is included in Attachment 16.1 & 16.2. Support personnel are available on the plant site Monday through Friday, 7 a.m. to 3:30 p.m. The site Manager is available via cellular phone in case of an emergency.

4.2. Plan Organization/Relationship to Other Plans

- 4.2.1. This Emergency Response Plan (ERP) addresses Occupational Safety and Health Act (OSHA) requirements for emergency response management and plans [29 Code of Federal Regulations (CFR) 1910.38 and 1910.120]. Section 5 of the ERP provides a description of the White Tail Response Management System. This section includes procedures for communicating emergency situations and describes the emergency equipment and resources available for response at White Tail. Sections 6 through 10 provide specific procedures for response to fire, medical, chemical release, security threat, and severe weather incidents. Contractor/visitor management and training procedures are described in sections 11 and 12.

A Spill Prevention Control and Countermeasure Plan (SPCC) is utilized to address oil pollution prevention and spill response requirements as specified in 40 CFR Part 112.

4.3. Plan Review and Revision

- 4.3.1. A review of the White Tail ERP shall be conducted and documented on an annual basis. The plan will also be reviewed and amended whenever there is a change in facility design, construction, operation, or maintenance that affects emergency response planning.

5. EMERGENCY RESPONSE MANAGEMENT:

5.1. Overall Organization

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5.1.1. Overall responsibility for the ERP lies with the White Tail O&M Manager. The O&M Manager or Lead Technician is responsible for program implementation, including designating evacuation routes and employee assembly points, coordinating severe weather activities, communicating emergency response procedures to site personnel, contracting with emergency response organizations, and contractor coordination.

5.2. Roles and Responsibilities

5.2.1. Specific management personnel will assume leadership roles for emergency responses. The Site Manager and/or Lead Technicians will assist in the implementation of this plan by knowing and communicating evacuation routes to workers during emergency evacuation and reporting the status of the evacuation to the Fire Department(s). The O&M Manager is responsible for seeing that this plan is implemented and will appoint an adequate number of personnel to enforce the plan, ensure everyone is familiar with this plan and act as a liaison with the local Fire Department(s).

All facility personnel have a responsibility to immediately report emergency situations to the Lead Technician on duty, who then notifies the O&M Manager and other key personnel of the situation using the White Tail Emergency Notification Telephone List (refer to Attachment 16.4). Where a Lead Technician is not assigned, facility personnel will refer to the Emergency Notification Telephone list to inform key personnel.

5.3. Preparation and Planning for Emergencies

5.3.1. Pre-planning for emergencies is a crucial element of this plan. The following steps have been taken in planning for emergency situations at the site:

- All main road entrances are established and are listed below and posted in the off-site White Tail O&M Building.

Entrance 1: **TBD**

- Evacuation route diagrams have been documented and posted in the off-site O&M Building.
- All buildings and property surrounded by fencing will be marked by signage that identifies specific hazards (such as the NFPA diamond, and all applicable Danger, Caution, Warning signal words).
- Site personnel receive instructions to keep exits from the site clear and to maintain ready access to fire extinguishers by not blocking them with furniture, or any other means.
- The site O&M Manager and Lead Technicians have been trained in their specific duties. All building occupants have been instructed to take action in case of an emergency through their copies of procedures and training, as needed.
- A variety of emergency response drills (such as fire, tornado, bomb threat, etc.) are held on a quarterly basis, and will be documented.

5.4. Communications

5.4.1. Timely and efficient communications are essential to deal with an emergency response situation. For that reason, the following requirements have been established at White Tail.

- Employees using radios/phones shall yield to individuals who are the most directly involved in an emergency response activity, i.e., emergency response takes priority over all other communication on company network.
- If radio/phone communications are interrupted or unclear, employees should proceed to the off-site O&M Building.
- All hand-held radio/phones should be recharged daily with back-up batteries ready for use.

5.5. Emergency Response Equipment

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5.5.1. A list of emergency response equipment available at White Tail is provided below staged in either crew trucks or at the off-site O&M building. Chemical spills may require the assistance of an Emergency Response Contractor who can quickly mobilize materials and equipment to address larger spills. White Tail has arranged with contractors to provide emergency response services in case of spills and releases. Contact information is provided in Attachment 16.4.

5.5.2. Communications Equipment

- Individually issued cell phone for use by site personnel with text weather/lightning alerts.
- Radios for use by crews in the field.
- Radio communication and weather monitoring at the off-site O&M building.
- Text weather alerts to individual cell phones via Televent DTN.

5.5.3. Personal Protective Equipment

- Rubber boots
- Rubber gloves
- Goggles
- Face shields
- Heat resistant gloves
- Leather Gloves
- 40 Cal Suits for ARC Flash
- Safety Toe Boots
- Hard Hats
- Safety Glasses
- Work gloves
- Hi-Vis Vest

5.5.4. Other Equipment maintained in off-site O&M Building and in crew trucks

- Shovels
- Rakes
- Tube absorbents
- Absorbent pads
- Absorbent material
- Fire extinguishers
- First Aid kits

5.6. **Emergency Evacuation**

5.6.1. Operating Site Drills

5.6.1.1. White Tail will conduct emergency response exercises quarterly to ensure employees are prepared to react and respond appropriately during contingency situations. Completion of these events is tracked in the Intelx system.

5.6.2. Evacuation Planning

5.6.2.1. Proper preparation and planning for emergencies are essential for evacuations to be effective and efficient. Quarterly drills are performed at White Tail to familiarize employees of procedures in the event of a real emergency. The Fire Department and other emergency response personnel will be requested to participate and assist with critique of evacuation drills, at least annually.

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White Tail personnel are instructed on the following:

- Know at least two exits whenever possible. Some terrain features on the project do not allow for two exits and means for egress are to be addressed before tasks start in these areas.
- Be familiar with the evacuation routes posted in the off-site O&M Building.

A White Tail evacuation sheet must be posted and orally communicated to site personnel. It is recommended that these procedures be discussed at periodic safety meetings in addition to being covered during new employee orientation.

5.6.3. Emergency Routes

- 5.6.3.1. Depending upon the degree of emergency, weather and/or site conditions, roadways as designated on the site drawings (Attachments 16.1 and 16.2) will be used for routes of evacuation. In the event of an evacuation, all personnel will meet at the off-site O&M building or lay down yard or other designated muster position for further information. If personnel are unable to make it to the designated assembly area, they should seek shelter wherever possible and contact their supervisor for further instructions.

5.6.4. Evacuation Procedures

- 5.6.4.1. When notified to evacuate, site personnel shall do so in a calm and orderly fashion, keeping the following instructions in mind:
 - Walk, do not run. Help others who need assistance.
 - Drive safely through smoke if you must.
 - Watch for other traffic and farm equipment on access roads and roadways.
 - Be aware of obstructed visibility depending on crop conditions (i.e. tall corn).
 - Be aware of ice/snow and loose gravel conditions, drive safely.

Site personnel shall go to the primary designated assembly area. If employees are unable to make it to the assembly area, they should contact their supervisor for further instructions.

During evacuation, the O&M Manager and/or Lead Technicians should ensure that every person on his/her crew has been notified and that evacuation routes are clear. Any person with a disability (mobility, hearing, sight) who requires assistance to evacuate is responsible for pre-arranging with someone in their immediate work area to assist them in the event of an emergency. Anyone knowing of a person with a disability or injury who was not able to evacuate will report this immediately to their supervisor.

Once an evacuation is complete, the O&M Manager or Lead Technician should account for all personnel.

6. FIRE/EXPLOSION:

In the event of an incipient stage (beginning, small) fire, employees should notify adjacent individuals of this situation and exit the area. Only employees trained in the use of fire extinguishers should attempt to use an extinguisher. Employees are not expected or authorized to respond to fires beyond the incipient stage (i.e., fires that are beyond the beginning stage and which cannot be extinguished using a hand-held, portable fire extinguisher). If necessary, the fire department should be immediately notified by dialing 911. Site management shall also be immediately notified of any emergency.

6.1. Response to a fire

The following actions should be taken by area personnel while awaiting the local fire department:

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- Make sure the immediate area of the fire is clear of personnel.
- Account for all employees, contractors, and visitors who were working in the area of the fire.
- Remove any obstructions (vehicles, material, etc.) that might impede response to the scene.
- Station available personnel at road intersections to stop traffic flow into the fire scene.
- Make sure the SDS sheets for the types of batteries and/or chemicals are available at the scene or within close proximity to aid the fire department in determining correct extinguishing agents to utilize on the fire.

In the event of an out-of-control fire, employees are to exit the area as quickly as possible and assemble for head count.

- Call the site emergency number immediately (911).
- For a small fire, use the fire extinguisher if possible, to put out the fire and stop as much oxygen from fueling the fire as possible.
- If you can extinguish the fire, maintain a safe distance and post a fire watch.
- If unable to extinguish, evacuate the area and maintain a safe distance.

7. MEDICAL EMERGENCY:

7.1. Medical Emergency Response Procedures

- 7.1.1. If an employee is injured, or an accident has occurred on site and first aid is not enough treatment for the emergency, 911 must be called. The call to 911 can be made by phone by any available site personnel. The caller must state to the dispatch that they are at the “White Tail Solar Energy Center” and provide the specific location. The local emergency response entities should have a cross reference map identifying individual locations. A second notification will be made to the off-site O&M Building, to inform others of the situation.

The nearest emergency response service is from Augusta Township, which provides both EMS and fire response services.

White Tail employees are certified in first aid/cardiopulmonary resuscitation (CPR) and may administer aid if they have completed training. An automated external defibrillator (AED) and trauma bag are stored at the off-site O&M Building and within each service truck and should be utilized as necessary. Additionally, the site has a Reeves Sleeve, backboard and litter basket to facilitate victim stabilization, during rescue and transport.

7.2. Non-Emergency Safety Incident

- 7.2.1. In the event a safety incident occurs where emergency response is not required (first aid treatment, near miss, etc.) work is to be stopped immediately and reported to the O&M Manager and/or Lead Technician. Risk will be reassessed, adequate controls implemented, and the situation made safe before resuming the task.

- 7.2.2. Follow procedure listed in the [Incident Reporting and Investigation Program](#)

8. SITE SPECIFIC HAZARDS

8.1. Snake Bite Procedure

- 8.1.1. Allow the bite to bleed freely for 15–30 seconds.
- 8.1.2. Cleanse and rapidly disinfect the area with an iodine solution (if not allergic to iodine, fish, or shellfish), and remove clothing and jewelry from the body extremity where the bite occurred (pant legs, shirt sleeves, rings, etc.)
- 8.1.3. If bite is on the hand, finger, foot, or toe - wrap the leg/arm rapidly with 3" to 6" of ACE or crepe bandage past the knee or elbow joint immobilizing it. Over-wrap bite marks. If possible, apply hard

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and direct pressure overbite using a 4" x 4" gauze pad folded in half twice to 1" x 1". Tape in place with adhesive tape. Soak gauze pad in Betadine™ solution if available and victim is not allergic to iodine, fish or shellfish.

- 8.1.4. Strap gauze pad tightly in place with adhesive tape.
- 8.1.5. Over-wrap dressing above, over, and below bite area with ACE or crepe bandage, but not too tight. Wrap ACE bandage as tight as one would for a sprain. Not too tight. Check for pulse above and below elastic wrap; if absent, the wrap is too tight. Unpin and loosen. If pulses are strong (normal), it may be too loose.
- 8.1.6. Immobilize bitten extremity use splinting if available.
- 8.1.7. If possible, try and keep bitten extremity at heart level or in a gravity-neutral position. Raising it above heart level can cause venom to travel into the body; below heart level can increase swelling.
- 8.1.8. Evacuate to nearest hospital or medical facility as soon as possible.
- 8.1.9. Try to identify the snake (ONLY if safe to do so). This is the least important thing you should do. Visual identification/description usually suffices, especially in the U.S. and in regions where the local fauna is known. Local symptoms will alert doctors to whether the bite is venomous.
- 8.1.10. Bites to face, torso, or buttocks are more of a problem. ACE or crepe bandaging cannot be used in these areas. A pressure dressing made of a gauze pad may help to contain venom.

8.2. What you should Communicate at the Hospital.

- 8.2.1. Ask the staff to immediately contact their designated Poison Control Center.
- 8.2.2. Ask the hospital staff to use physician consultants available through the nationwide Poison Control Network if necessary.

8.3. What NOT to do if bitten by a venomous snake.

- 8.3.1. Contrary to advice given elsewhere, do not permit removal of pressure dressings or ACE bandages until you are at the treatment facility and the physician is ready and able to administer anti-venom. When the dressings are released, the venom will spread causing the usual expected problems associated with a venomous snakebite.
- 8.3.2. Do **not** eat or drink anything.
- 8.3.3. Do **not** engage in strenuous physical activity.
- 8.3.4. Do **not** apply oral/mouth suction to the bite.
- 8.3.5. Do **not** cut into or incise bite marks with a blade.
- 8.3.6. Do **not** drink any alcohol or use any medication.
- 8.3.7. Do **not** apply hot or cold packs.
- 8.3.8. Do **not** apply a narrow, constrictive tourniquet such as a belt, necktie, or cord.
- 8.3.9. Do **not** use a stun gun or electric shock of any kind.
- 8.3.10. Do **not** remove dressings/wraps until arrival at hospital and anti-venom is readily available.
- 8.3.11. Do **not** bring the snake to the Emergency Room (take a picture of the snake instead if possible).

9. CHEMICAL RELEASE:

The phases of emergency response may be categorized as follows:

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- Discovery.
- Initial response / notification.
- Sustained actions.
- Termination and follow-up actions.

9.1. Discovery

9.1.1. Without entering an immediate hazard area, the employee who first discovers an emergency should identify the following:

- Is there a fire, spill, or explosion?
- Does medical assistance appear to be needed?
- Who/what is at risk: people, property, or the environment?
- Where does the released chemical appear to be migrating?
- What are the weather and terrain conditions?

The employee will also isolate the area to keep people away from the scene until trained responders arrive, if it is safe to do so. An employee who has not received training in emergency response should take no actions beyond notification, isolation of the area, and personal safety precautions. Any efforts made to rescue persons, protect property, or protect the environment must be weighed against the possibility of becoming part of the problem. Persons at the scene must not walk or touch spilled material or inhale fumes, smoke, and vapors.

9.2. Initial Response/Notification Procedures

9.2.1. The initial response phase starts with notification, which activates the emergency response system. Anyone who observes or receives information regarding an emergency at White Tail should immediately notify available personnel using the White Tail radio network or their issued cell phones. The O&M Manager and/or Lead Technician will then ensure 911 is notified. At White Tail, employees are notified of emergencies by cell phone/radio, and word of mouth from the O&M Manager and/or Lead Technicians. Attachment 16.3 provides a list of emergency notification information for White Tail personnel.

If an event has the potential to impact the local community, White Tail will contact local fire/police to make community notifications. Attachment 16.3 also provides notification information for the Company Public Affairs team who will provide guidance for instances involving media. Attachment 16.4 provides contact information for external support organizations. The O&M Manager and/or Lead Technicians will coordinate any media efforts through the White Tail Asset Manager and Company Legal Department.

Trained responders (dispatched by White Tail at Company discretion) are called to the scene to begin the process of hazard assessment, establish objectives and priorities, implement a tactical plan, and mobilize resources. Trained responders may enter the area only when wearing appropriate protective gear. Only trained responders are authorized to risk exposure to chemicals for purposes of containing or stopping the material release.

The O&M Manager/Emergency Coordinator or designee will be responsible for notifying the appropriate regulatory agencies and, if necessary, the Emergency Response Contractor and/or Consultant or mutual aid groups. Attachment 16.4 is a list of offsite emergency contacts and agencies that may be notified in the event of an emergency. The incident will be documented using the White Tail Release Reporting Form and the SPCC Plan in the event of an oil spill.

9.3. Sustained Actions

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9.3.1. The O&M Manager is the designated Emergency Coordinator at White Tail. In his absence, the Lead Technician assumes the lead as the Emergency Coordinator. In the event both the O&M Manager and Lead Technician are absent, their designee will assume the role of Emergency Coordinator. The Emergency Notification List in Attachment 16.3 details personnel who will assume the Emergency Coordinator role if both the O&M Manager and Lead Technician are absent. The Emergency Coordinator takes control of the emergency and any resources necessary until the emergency has been eliminated and the necessary cleanup and/or restoration are complete.

The Emergency Coordinator will direct the following activities during the evaluation process:

- Evaluate if operations in the affected area should be shut down.
- Take precautions to prevent or limit the spread of fire or explosions.
- Isolate affected area and provides direction for radio announcements.
- Determine the source/cause of the emergency and evaluate the primary and secondary hazards to allow a full-scale, safe response.
- Ensure that appropriate internal and external notifications are made.
- Coordinate outside assistance from public or private organizations.
- Implement other appropriate response provisions as necessary.

Only employees that are properly trained in accordance with 29 CFR Part 1910.120(q)(6) may respond to chemical releases.

In the absence of properly trained and equipped emergency responders, all personnel are to evacuate and meet at a pre-designated assembly area. The Emergency Coordinator must then contact a pre-arranged spill response contractor or contact a municipal service for hazardous material response. It is the responsibility of the Emergency Coordinator to determine whether the local municipal responders are capable of, or will in fact, respond to a release at the site. If not, a private contractor must be retained.

9.4. **Post Emergency Reporting Procedures**

9.4.1. Following the occurrence of a spill of a reportable quantity or any emergency described in this plan, and in compliance with facility permits and other County and/or State requirements, an incident report will be prepared by the O&M Manager and relayed to the site owner after review by the Company Regional EHS Manager. The site owner will then transmit the report to the appropriate individuals and agencies. These incidents should be recorded using the Intellex incident management system. Additional Guidance can also be found in the site's SPCC plan.

The O&M Manager shall compile all documentation and perform a post-accident investigation. Immediate performance of this activity will aid in determining the exact circumstances and cause of the incident.

Issues to be determined include:

- Causes of the incident
- Effectiveness of the emergency response plan
- Need for amendments to the response plan
- Need for additional training programs

9.5. **White Tail Solar Energy Center Material Inventory**

9.5.1. The following paragraphs describe the chemicals that are considered potential sources of release for emergency planning purposes. Additional information on site chemicals is contained on the SDS sheets available in our online 3E database, hardcopies, or in the Tier II report filed annually.

The materials that will be used and stored at White Tail consist primarily of:

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- Oil(s)

9.6. Response Procedures

9.6.1. The table below provides a spill response reference for general chemical hazards. SDS sheets should be referred to for specific response measures in the event of a release.

| Material | Response Measures |
|------------------------------------|---|
| Flammable and combustible | Prohibit open flames, sparks, or ignition sources from area. Absorb with absorbent material. Due to viscosity, oils and flammable sludge may require collection by high suction pumps. For large oil spills, use sand as absorbent. Collect all spills in appropriate containers. Cover, label, and store properly. |
| Solvents (nonflammable) | Absorb with absorbent material. Due to viscosity, solvent sludge may require collection by high suction pumps. Collect spill appropriate container. Cover, label, and store properly. |
| Acid, caustic, oxidizer, corrosive | <p><u>Small-Volume Spills:</u> Sprinkle with neutralizer until bubbling reaction ceases. Collect in appropriate container with vacuum or shovel. Cover, label, and store properly.</p> <p><u>Large-Volume Spills:</u> Contact Emergency Coordinator.</p> |
| Miscellaneous chemicals | Absorb with absorbent material. Collect in appropriate container. Cover, label, and store properly. |

White Tail personnel are assigned the responsibility of assisting in accomplishing these initial response measures. Only trained responders are authorized to risk exposure to chemicals for purposes of containing or stopping material releases.

10. SECURITY THREAT:

10.1. Bomb Threat

10.1.1. The purpose of this plan is to give direction to all site staff in the event White Tail is a target of an actual or threatened bomb assault/attack.

Anyone receiving a bomb threat shall:

- Treat the caller with courtesy and respect. Complete the Bomb Threat Report (Attachment 16.5). Use this sheet as a reference while talking with the caller making the threat.
- Attempt to obtain as much information as possible. See the “Bomb Threat Checklist” (Attachment 16.6).
- Immediately notify the White Tail Emergency Coordinator by phone. Stop all radio transmissions from this point on until cleared by the Emergency Coordinator or other competent authority. Radio transmissions can activate electronic detonating or timing devices.

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The Emergency Coordinator will immediately notify 911. The Emergency Coordinator shall:

- Evaluate the threat and determine the appropriate course of action to take.
- Notify law enforcement and/or ambulance.
- Evacuate the facility as necessary.
- Coordinate evacuation of any part of the surrounding community with local authorities as needed.
- Coordinate search of the site with proper authorities.

10.1.2. If any suspicious item(s) are found, they are not to be touched. Barrier tape will be used to mark the area where the suspicious item(s) are by extending a continuous line of tape beginning immediately in front of the suspicious item(s) and extending to just outside the room exit. This will help guide local authorities to the suspicious item.

The Emergency Coordinator will ensure that the “All Clear” message is communicated once the threat has passed or is no longer present.

10.2. Chemical/Biological Agent Threat

10.2.1. The procedures described previously for a bomb threat should be used for a chemical or biological agent threat. Refer to Attachment 16.7 for a copy of the phone report when receiving such a threat and Attachment 16.8 for a checklist.

10.3. Sabotage

10.3.1. The purpose of this plan is to guide site staff in procedures to follow when detecting any intentional act that could cause damage or injury to people or property.

This emergency procedure will be implemented by the Emergency Coordinator when, in his opinion, any act has occurred or is about to occur which could likely cause injury or mass destruction to personnel or property.

- Anyone detecting any act or threat of any act of sabotage will immediately notify the site manager or their designated lead.
- The Emergency Coordinator will be immediately notified of this information. The Emergency Coordinator will evaluate the situation and decide what actions to take.
- The following options should be considered and/or implemented:
 - Notification of 911.
 - Evacuation of the facility.
 - Evacuation of any part of the surrounding community.
 - Take corrective action as required, providing that no person will risk injury.

11. SEVERE WEATHER:

Severe weather (thunderstorm, tornado, flash floods) can occur with minimal notice based on local weather conditions. A DTN weather satellite is monitored via computers at White Tail off-site O&M Building. ICC operators (Chicago) also monitor this system and will contact O&M office if inclement weather is threatening. Employees are immediately notified to evacuate the site, or to take cover. When lighting activity threatens the Site, the following incremental steps be taken to minimize personnel exposure:

- A. Lighting Detected at 30 miles: Notify site personnel of increased lightning hazard; prepare to cease outdoor activity
- B. Lighting Detected at 15 miles: Cease outdoor activity other than securing equipment; personnel not occupied with securing equipment shall move to designated shelters

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- C. Lighting Detected at 8 miles: Cease all outdoor activity and abandon efforts to secure equipment if not completed; all personnel take cover in a designated shelter

In the case of a severe storm approaching White Tail, the following steps are to be taken:

Severe Storm/Wind Warning (1 to 24 hrs notice)

- Employees should make sure that all materials and equipment are secure.
- Panels will be stowed properly based on Nevados guidelines
- All crane booms shall be lowered to the ground and secured.
- All small vehicles, welding machines and compressors shall be secured.
- Storm will be monitored and, if necessary, site shall be evacuated.

11.1. Tornadoes

11.1.1. Tornadoes can affect the White Tail area. In the event of a severe storm, work will be stopped. If the National Weather Service alerts a Tornado Warning, employees will take proper shelter. If a tornado warning is activated in a neighboring county, and the weather service has forecasted the tornado traveling towards the project, employees should secure essential equipment. The O&M Manager and/or Lead Technician may dismiss employees from the site if conditions warrant it.

Tornados can strike with little warning, so prepare before severe weather moves into your area. Learn the tornado warning signals used in your community. The most common warning is a siren, which means you should stay inside and take cover immediately. If warning signals are not available, look for these signs of danger: Dark, greenish skies, large hail, rotating low-altitude cloud, and/or loud roar, like a train.

11.1.1.1. **Tornado Watch** - issued when conditions are favorable for the development of tornados, people located in and around the watch area should keep an eye to the sky and listen to a NOAA weather radio and/or local broadcast media for further weather information. The watch is intended to give you time to prepare, time to review safety rules, and the site emergency response plan.

11.1.1.2. **Tornado Warning** - issued when a tornado has been detected by national weather service Doppler radar or a reliable report has been received. A warning is usually issued for portions of one or two counties, for an hour or less. If the warning includes your neighborhood or workplace, you should take immediate action to protect your life and the lives of others.

11.1.1.3. **Office:** The safest place to be during a tornado is underground. In the event of a tornado, seek shelter in the off-site O&M building in a central portion of the building away from glass, windows or doors. Another option is to seek refuge at a community shelter or make plans to stay with a friend or relative. As a last resort, go outside to a low area and lie flat on the ground with your hands over your head and neck; be alert for flash floods and hail, which often accompany tornados.

11.1.1.4. **Vehicles:** Do not try to outrun a tornado. If you see a funnel cloud or hear a tornado warning, get out of your vehicle and seek shelter in the nearest sturdy, enclosed building. If such a shelter is not available, lie down in a low area with your hands covering your head and neck; be alert for flash floods.

11.1.2. Plan Ahead

11.1.2.1. To prepare for a tornado, White Tail will keep on hand a disaster emergency kit and conduct tornado drills

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Listed below are a few items to keep in your storm shelter:

- **Basic medicine:** Keep an ANSI approved first-aid kit stocked with basic antiseptic gels, pain relievers, antibiotics and other basic medications in the storm shelter. Change out the medicines when they are nearing an expiration date.
- **Drinking water to last for short stay:** Always keep water in the storm shelter. Change it out regularly to prevent stagnation and use options that are designed to maintain a long shelf-life, like bottled water that is treated to last for an extended period.
- **Flashlights and batteries:** Flashlights are useful. Keep several flashlights and a large number of batteries in the storm shelter. These will provide light during a power outage, especially if a backup generator does not work for any reason.
- **Cell phone, battery-operated charger and extra batteries:** Even though cellular service may be down during and after the storm, eventually it will come back up. Keep a cell phone, extra batteries and a battery-operated cellphone charger so that it is possible to send out a call for help if debris, snow or other items are not possible to move.
- **Battery operated radio:** In the case that power is lost, have a battery-operated radio on hand to keep up to date on the local weather surroundings.

11.2. Flash Floods

11.2.1. Flash floods pose potential problems at White Tail. During a rain event, seek high ground. Flash floods can trap employees at low level areas. Employees are to only travel through minimal moving water if they MUST. Otherwise, if water poses no further danger, they are to stay on high ground until the water subsides. Generally driving near swollen creeks, rivers and natural waterways in the area will be performed with caution.

12. CONTRACTOR/VISITOR COORDINATION:

- 12.1. It is the responsibility of the O&M Manager to work with contractor safety supervisors to ensure that the requirements of this plan are carried out. If the contractor intends to handle spills with an in-house team, copies of applicable training records must be provided by the contractor for review prior to beginning work. Please refer to Chapter 3 of the EHS Manual regarding Contractor and Visitor management for additional guidance.

13. TRAINING:

- 13.1. The White Tail O&M Manager is responsible for directing quarterly drills on all shifts and providing ERP training to all White Tail employees at least annually. The ERP will also be reviewed with each affected employee when: (1) the plan is developed or when the employee is assigned initially to a job, (2) when the employee's responsibilities under the plan change, and (3) when the plan is changed.

Training and/or refresher of the ERP to site personnel shall be conducted annually. Documentation of ERP training is maintained in site files.

14. RESPONSIBILITIES:

14.1. O&M Manager

14.1.1. White Tail O&M Manager (listed in attachment 16.6) is responsible for understanding and adhering to the procedure.

14.1.2. O&M Manager will train employees to assist in a safe and orderly evacuation of other employees

14.2. White Tail Solar Energy Center Staff

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14.2.1. White Tail Staff are responsible for understanding and adhering to the procedure.

15. DATA RETENTION:

15.1. None

16. ATTACHMENTS:

- 16.1. Site Location Map
- 16.2. Site Layout
- 16.3. Occupational Clinic Map and Directions
- 16.4. Alternate Occupational Clinic and Directions
- 16.5. Hospital Map and Directions
- 16.6. Whitetail Solar Energy Center Emergency Notification List
- 16.7. External Notification List
- 16.8. Bomb Threat Report
- 16.9. Bomb Threat Checklist
- 16.10. Chemical/Biological Agent Threat Report
- 16.11. Chemical/Biological Agent Threat Checklist

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Attachment 16.1: Site Location Map

TBD

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Attachment 16.2: Site Layout and Facilities Map

TBD

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Attachment 16.3: Occupational Clinic Map and Directions

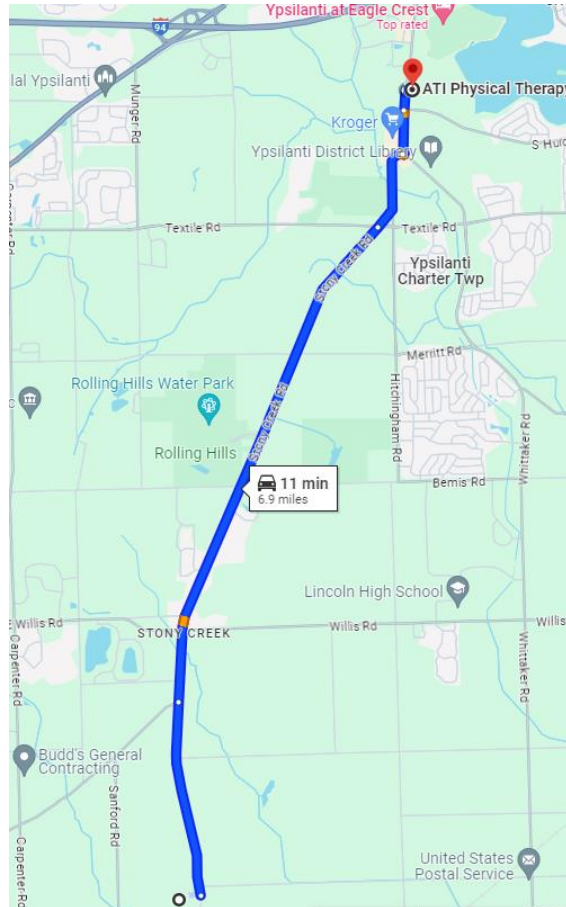
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EMERGENCY RESPONSE PLAN

Issued:
MMDDYY

ATI Physical Therapy
1613 Huron St, Ypsilanti, MI 48197
(734) 483-9200



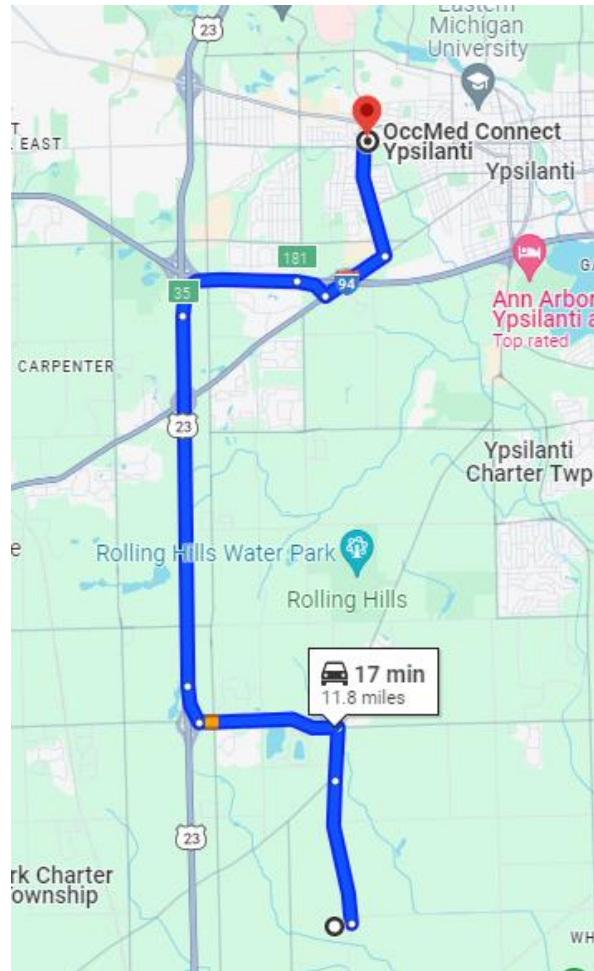
Directions

1. Head north on McCrone Rd toward Talladay Rd – 1.5 mi
2. Continue onto Stony Creek Rd – 4.1 mi
3. At the traffic circle, continue straight to stay on Stony Creek Rd – 0.7 mi
4. At the traffic circle, take the 3rd exit onto Whittaker Rd – .4 mi
5. Continue onto Huron St – 0.2 mi
6. Turn right – 190 ft

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Attachment 16.4: – Alternate Occupational Clinic Map and Directions

OccMed Connect Ypsilanti
494 N Hewitt Rd, Ypsilanti, MI 48197
(734) 437-0325

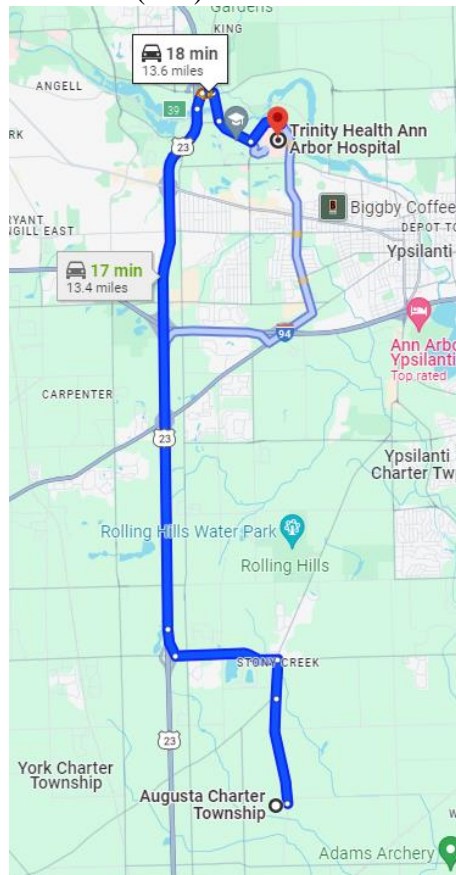


Directions

1. Head north on McCrone Rd toward Talladay Rd – 1.5 mi
2. Continue onto Stony Creek Rd – 0.6 mi
3. Turn left onto Willis Rd – 1.5 mi
4. Turn right onto the ramp to Ann Arbor – 0.4 mi
5. Merge onto US-23 N - 3.9 mi
6. Take exit 35 to merge onto I-94 E - 1.5 mi
7. Take exit 181 for US-12 W/Michigan Ave toward Ypsilanti – 0.4 mi
8. Turn left onto US-12 E/W Michigan Ave – 0.8 mi
9. Use the left 2 lanes to turn left onto S Hewitt Rd – 1.3 mi
10. Turn right – 75 ft
11. Turn right – 95 ft

Attachment 16.5: – Hospital Map and Directions

Trinity Health Ann Arbor Hospital
5301 McAuley Dr,
Ypsilanti, MI 48197
(734) 712-3456

**Directions**

1. Head north on McCrone Rd toward Talladay Rd – 1.5 mi
2. Continue onto Stony Creek Rd – 0.6 mi
3. Turn left onto Willis Rd – 1.5 mi
4. Turn right onto the ramp to Ann Arbor – 0.4 mi
5. Merge onto US-23 N – 7.7 mi
6. Take exit 39 for Geddes Road – 0.2 mi
7. At the traffic circle, take the 1st exit onto Geddes Rd – 0.2 mi
8. Turn right onto N Dixboro Rd – 0.4 mi
9. Continue onto E Huron River Dr – 0.6 mi
10. Turn left onto McAuley Dr – 0.6 mi
11. Turn Right – 43 ft

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Attachment 16.6: Whitetail Energy Center Emergency Notification List

| TITLE | INDIVIDUAL | TELEPHONE NUMBER |
|--|------------------|------------------|
| O&M Manager / Emergency Coordinator | TBD | |
| Site Safety Rep | Warren Ketterman | (304) 618-9164 |
| Lead Technician | TBD | |
| Senior EHS Manager / Alternate Emergency Contact | Dustin Luensmann | (806) 475-1718 |
| Invenergy Regional Director | Chris Bruce | (734) 564-3837 |
| Company Asset Manager Whitetail Solar Energy Center | Michael Courtney | (847) 254-9692 |
| 24/7 Company Control Center | Operator on Duty | (312) 582-1588 |

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Attachment 16.7: External Notification List

| Organization | Telephone Number |
|--|-------------------------|
| <u>OFFSITE EMERGENCY ASSISTANCE</u> | |
| Police/ Fire / Ambulance | 911 |
| Michigan State Police | (517) 332-2521 |
| Augusta Township Fire Department 10093 Whittaker Rd, Ypsilanti, MI 48197 | (734) 461-9500 |
| Washtenaw County Sheriff 1025 S Main St, Kenton, OH 43326 | (734) 439-0777 |
| Trinity Health Ann Arbor Hospital 5301 McAuley Dr, Ypsilanti, MI 48197 | (734) 712-3456 |
| ATI Physical Therapy 1613 Huron St, Ypsilanti, MI 48197 | (734) 483-9200 |
| <u>EMERGENCY SPILL RESPONSE</u> <u>CONTRACTOR</u> TBD | |
| <u>AGENCY NOTIFICATIONS</u> | |
| NRC (24-hour) (Report Oil Spills) | 800/424-8802 |
| Michigan Spill Reporting Hot Line | 800/292-4706 |
| Michigan Department of Environmental Quality | 800/662-9278 |
| <u>ADDITIONAL ASSISTANCE</u> | |
| State Poison and Drug Center | 911 |

Attachment 16.8: Bomb Threat Report

| | | | | |
|--|--|---|---|--|
| *** KEEP CALLER ON THE LINE AS LONG AS POSSIBLE! *** | | | | |
| Exact words of caller: _____ | | | | |
| Questions to ask the caller: | | | | |
| 1. When is the bomb going to explode? _____ | | | | |
| 2. Where is the bomb right now? _____ | | | | |
| 3. What kind of bomb is it? _____ | | | | |
| 4. What does the bomb look like? _____ | | | | |
| 5. Why did you set the bomb? _____ | | | | |
| 6. Where are you calling from? _____ | | | | |
| 7. What is your name? _____ | | | | |
| Try to determine the following | | | | |
| <u>IDENTITY:</u> | <input type="checkbox"/> male | <input type="checkbox"/> female | <input type="checkbox"/> adult | <input type="checkbox"/> juvenile (age? _____) |
| <u>VOICE:</u> | <input type="checkbox"/> loud | <input type="checkbox"/> high-pitched | <input type="checkbox"/> deep | <input type="checkbox"/> raspy |
| | <input type="checkbox"/> disguised | <input type="checkbox"/> broken | Other: _____ | |
| <u>ACCENT:</u> | <input type="checkbox"/> local | <input type="checkbox"/> not local | <input type="checkbox"/> foreign | <input type="checkbox"/> regional _____ |
| <u>RACE:</u> | <input type="checkbox"/> Caucasian | <input type="checkbox"/> Black | <input type="checkbox"/> Hispanic | <input type="checkbox"/> Asian |
| | Other: _____ | | | |
| <u>SPEECH:</u> | <input type="checkbox"/> educated | <input type="checkbox"/> average | <input type="checkbox"/> illiterate | <input type="checkbox"/> obscene |
| | Other: _____ | | | |
| <u>MANNER:</u> | <input type="checkbox"/> calm | <input type="checkbox"/> angry | <input type="checkbox"/> rational | <input type="checkbox"/> irrational |
| | <input type="checkbox"/> incoherent | <input type="checkbox"/> deliberate | <input type="checkbox"/> self-righteous | <input type="checkbox"/> laughing |
| | <input type="checkbox"/> intoxicated | | | |
| <u>BACKGROUND NOISES:</u> | | | | |
| | <input type="checkbox"/> office machines | <input type="checkbox"/> factory machines | <input type="checkbox"/> bedlam | <input type="checkbox"/> trains |
| | <input type="checkbox"/> quiet | <input type="checkbox"/> voices | <input type="checkbox"/> mixed sounds | <input type="checkbox"/> airplanes |
| | <input type="checkbox"/> music | <input type="checkbox"/> traffic | Other: _____ | |
| If the voice is familiar to you, who did it sound like? _____ | | | | |
| Additional Information: _____ | | | | |
| Date ____/____/____ Time: ____:____ a.m./p.m. Received by: _____ | | | | |

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Attachment 16.9: Bomb Threat Checklist

| |
|---|
| Mail Threat: |
| <p>_____ 1. Handle documents as little as possible to preserve fingerprints.</p> <p>_____ 2. Hand deliver immediately to O&M Manager.</p> |
| Phone Threat: |
| <p>_____ 1. Complete Bomb Threat Form.</p> <p>_____ 2. Deliver completed form to O&M Manager.</p> <p>_____ 3. Notify Supervisor immediately.</p> |
| O&M Manager: |
| <p>_____ 1. Gather all information regarding threat.</p> <p>_____ 2. Decide upon course of action.</p> <p>_____ 3. Coordinate searches with proper authorities.</p> |
| Suspicious Objects: |
| <p>_____ 1. DO NOT TOUCH OR ATTEMPT TO MOVE!</p> <p>_____ 2. Notify County Sheriff—911.</p> |
| Evacuation: |
| <p>_____ 1. Announce over radio or phone system, give location where to assemble. Do not use the radio.</p> <p>_____ 2. Enlist volunteers to remain and shut down site.</p> |
| Re-entry: |
| <p>_____ 1. Determined based on:</p> <p style="padding-left: 40px;">_____ a. “All-clear” given by bomb disposal unit.</p> <p style="padding-left: 40px;">_____ b. O&M Manager’s judgment that danger is passed.</p> <p>_____ 2. Full report prepared.</p> |

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Attachment 16.10: Chemical/Biological Agent Threat Report

| ***KEEP CALLER ON THE LINE AS LONG AS POSSIBLE*** | | | | |
|--|--|---|---|--|
| Exact words of caller: _____ | | | | |
| Questions to ask the caller: | | | | |
| 1. What chemical or biological agent is it? _____ | | | | |
| 2. When is the agent going to be released? _____ | | | | |
| (date) (time) | | | | |
| 3. Where is it right now? _____ | | | | |
| (Building) (Floor) (Room) | | | | |
| 4. Who put it there? _____ | | | | |
| 5. What does it look like? _____ | | | | |
| 6. What will cause it to spread? _____ | | | | |
| 7. What will trigger it? _____ | | | | |
| 8. Where did you get the agent? _____ | | | | |
| 9. Why are you doing this? _____ | | | | |
| 10. What is your name? _____ | | | | |
| 11. What is your telephone number and address? _____ | | | | |
| Try to determine the following | | | | |
| <u>IDENTITY:</u> | <input type="checkbox"/> male | <input type="checkbox"/> female | <input type="checkbox"/> adult | <input type="checkbox"/> juvenile (age? _____) |
| <u>VOICE:</u> | <input type="checkbox"/> loud | <input type="checkbox"/> high-pitched | <input type="checkbox"/> deep | <input type="checkbox"/> raspy <input type="checkbox"/> pleasant |
| | <input type="checkbox"/> disguised | <input type="checkbox"/> broken | Other: _____ | |
| <u>ACCENT:</u> | <input type="checkbox"/> local | <input type="checkbox"/> not local | <input type="checkbox"/> foreign | <input type="checkbox"/> regional: _____ |
| <u>RACE:</u> | <input type="checkbox"/> Caucasian | <input type="checkbox"/> Black | <input type="checkbox"/> Hispanic | <input type="checkbox"/> Asian |
| | Other: _____ | | | |
| <u>SPEECH:</u> | <input type="checkbox"/> educated | <input type="checkbox"/> average | <input type="checkbox"/> illiterate | <input type="checkbox"/> obscene |
| | Other: _____ | | | |
| <u>MANNER:</u> | <input type="checkbox"/> calm | <input type="checkbox"/> angry | <input type="checkbox"/> rational | <input type="checkbox"/> irrational <input type="checkbox"/> coherent |
| | <input type="checkbox"/> incoherent | <input type="checkbox"/> deliberate | <input type="checkbox"/> self-righteous | <input type="checkbox"/> laughing <input type="checkbox"/> intoxicated |
| <u>BACKGROUND NOISES:</u> | | | | |
| | <input type="checkbox"/> office machines | <input type="checkbox"/> factory machines | <input type="checkbox"/> bedlam | <input type="checkbox"/> trains <input type="checkbox"/> quiet |
| | <input type="checkbox"/> voices | <input type="checkbox"/> mixed sounds | <input type="checkbox"/> airplanes | <input type="checkbox"/> music <input type="checkbox"/> traffic |
| | <input type="checkbox"/> party | Other: _____ | | |
| If the voice is familiar to you, who did it sound like? _____ | | | | |
| Additional Information: _____ | | | | |
| Date ____/____/____ Time: ____:____ a.m./p.m. Received by: _____ | | | | |

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Attachment 16.11: Chemical/Biological Agent Threat Checklist

| |
|---|
| Mail Threat: |
| <p>_____ 1. Handle documents as little as possible to preserve fingerprints.</p> <p>_____ 2. Hand-deliver immediately to O&M Manager.</p> |
| Telephone Threat: |
| <p>_____ 1. Complete the Chemical/Biological Threat Report form.</p> <p>_____ 2. Deliver completed form to O&M Manager immediately.</p> |
| O&M Manager: |
| <p>_____ 1. Gather all information regarding threat.</p> <p>_____ 2. Decide upon course of action.</p> |
| Searches: |
| <p>_____ 1. Comprehensive—To be conducted by trained law enforcement personnel only.</p> |
| Suspicious Objects: |
| <p>_____ 1. Do not touch or attempt to move.</p> <p>_____ 2. Notify police.</p> |
| Evacuation: |
| <p>_____ 1. Make a site-wide announcement and give location where to assemble.</p> <p>_____ 2. Enlist volunteers to remain and shut down site.</p> |
| Re-entry: |
| <p>_____ 1. Determined based on:</p> <p style="padding-left: 40px;">_____ a. “All-Clear” given by competent authority.</p> <p style="padding-left: 40px;">_____ b. O&M Manager’s judgment that danger has passed.</p> <p>_____ 2. Full report prepared.</p> |

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AMENDMENT RECORD SHEET

| Version | Description: | Date: |
|---------|-------------------|--------|
| 1.0 | Original Document | MMDDYY |
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