EMERGENCY ACTION/RESPONSE PLAN

Page # 1:	Table of Contents	
Page # 2:	Purpose/Scope and Statement of Policy	
Page # 3:	Document Management	
Page # 4:	Incident Discovery and Internal Notification	
Page # 5:	Outside Emergency Response Notification	
Page # 6:	Emergency Phone Numbers and Non-Emergency Phone Numbers	
Page # 7:	Job – Specific Responsibilities	
Page # 8:	Emergency Response Coordinator List and Responsibilities	
Page # 9:	Evacuation Coordinator List and Responsibilities	
Page # 10:	Tenant Coordination including Contact list	
Page # 11:	Shutdown Procedures and Incident Control – Ammonia Releases	
Page # 12:	Termination and Follow-up Action - Training Requirements	
Page # 13:	Chart of Authority	
Page # 14:	Emergency Action Plan Synopsis	
Page # 15:	Fire Evacuation Procedures	
Page # 16:	Tornado/Hurricane Evacuation Procedures	
Page # 17:	Flood Evacuation Procedures	
Page # 18:	Earthquake Procedures	
Page # 19:	Ammonia Evacuation Procedures	
Page # 20:	Post-Incident Disaster Recovery Procedures	
Page # 21:	Evacuation Procedures for Posting	
Last Section:	Training Documents, Program Review minutes, Facility Maps, Relevant P&ID Drawings, Facility Description/Layout, etc.	

EMERGENCY ACTION/RESPONSE PLAN

PURPOSE and SCOPE

Millard Refrigerated Services' Emergency Action/Response Plan (EARP) is to prepare your facility for an emergency situation, including an ammonia release. The EARP is an essential component to Millard's overall safety program. The EARP states Millard's policy for responding to fire, weather and ammonia emergencies.

This policy outlines the minimum requirements for Millard's Emergency Action/Response Plan. Each Plant Manager must develop a plan that applies these requirements to their ammonia-refrigerated warehouse. The plan will include identifying the responsibilities for specific employees who may participate in an emergency response. It is the policy of Millard to participate with local responding units in an emergency response rather than have an entire trained emergency response team onsite.

STATEMENT of POLICY

It is Millard's policy to implement the requirements of this Emergency Action/Response Plan (EARP) by managing and operating the ammonia refrigerated warehouse facility in accordance with the OSHA and EPA regulations and general good operating practices. The objective is to minimize the risk to employees, the community and the integrity of customer's products during an emergency.

The employees are expected to cooperate as directed by the emergency response management to assure successful resolution of the emergency.

The Plant Manager or Plant Engineer must coordinate the Emergency Response Plan with the local LEPC and the local HAZMAT Team and/or local fire department. Plus, extend annual invitations for the local fire department and HAZMAT team to tour your facility. The completed tours must be documented. The HAZMAT Team must be informed of the ammonia exposure present in the facility and what their role is in the event of a spill/release. The LEPC and/or HAZMAT Team should review the Emergency Action/Response Plan as well as participate in the annual emergency evacuation drill.

Current Revision Date: May 2010

Facility Description: This location is an ammonia refrigerated warehouse facility.

Name and	Millard Refrigerated Services
Address	Insert your address, both mailing and location if different
Phone:	
Fax:	
Municipalities	Insert lot and block number from local tax map
County	
Employer ID #	
SIC Code:	SIC 4222
Area Description	Insert a brief description of the area surrounding the facility

DOCUMENT MANAGEMENT

The following personnel are required to have a complete copy of the Emergency Action/Response Plan (EARP) The most authorized person for the 2^{nd} and 3^{rd} shift must also receive a copy of the EARP.

Name	Position	
	Plant Manager	
	Plant Engineer	
	Operations Manager	
	Superintendent	
	Emergency Response Coordinator (if not above)	
Rachelle J. O'Dell, CISR	Claims/Risk Management	
Pete Howe	Corporate Engineer	
	Other	
The following off-site organization	has been offered and/or provided a copy of the EARP.	
Name	Organization	
		
	Local Emergency Planning Commission (LEPC)	
	Local HAZMAT Team	

Remember: The Plant Manager or Plant Engineer must coordinate the Emergency Action/Response Plan with the local LEPC and the local HAZMAT Team and/or local fire department depending on the jurisdiction in which your facility is located.

Local Fire Department

PERSONNEL

The Following company personnel are the key contact(s) for the EARP. These employees can be contacted to obtain additional information on the plan development and implementation.

<u>Name</u>	Position	Phone Number
	Plant Manager	
	Plant Engineer	
	Corporate Engineer	

INCIDENT DISCOVERY and INTERNAL NOTIFICATIONS

All employees are required to report any emergency situations immediately to their Supervisor. The Supervisor will contact the Plant Manager or Alternate ERC to assess the situation and determine the appropriate action. Only the Plant Manager, Alternate ERC, or Plant Engineer have the authority to contact the appropriate outside emergency agencies and building tenants. Outside agencies would include the Fire Department, HAZMAT Team or ambulance.

Ammonia is a hazardous chemical that is present throughout our warehouses. Ammonia is a strong alkali that can damage all body tissues, such as skin, eyes, and internal organs if ingested. However, there are no long-term effects from limited exposure to ammonia. Ammonia has a distinct, pungent aroma.

The Plant Manager is the primary Emergency Response Coordinator (ERC). The Plant Manager will identify and assign Alternate Emergency Response Coordinator, which are required in case the Plant Manager can't be reached and/or if there are multiple operating shifts. The number of Alternate ERC will depend on the magnitude of your operations. An ERC and Alternate ERC is required per-shift.

In case of an emergency during non-primary business hours the Alternate ERC will immediately investigate the emergency and notify the Plant Manager (primary ERC) of any emergency situation. Inturn the Plant Manager will instruct the alternate ERC on the actions that need to be taken. If a major emergency is occurring then the Alternate ERC must implement the EARP, notify the appropriate outside response agency, then notify the Plant Manager.

The Primary and Alternate ERC's Are:

Primary ERC	Insert person's name, title and Home/Cell/Office phone number
Alternate ERC # 1	Insert person's name, title and Home/Cell/Office phone number
Alternate ERC # 2	Insert person's name, title and Home/Cell/Office phone number
Alternate ERC # 3	Insert person's name, title and Home/Cell/Office phone number
Alternate ERC # 4	Insert person's name, title and Home/Cell/Office phone number
Alternate ERC # 5	Insert person's name, title and Home/Cell/Office phone number

When the Alternate ERC <u>can not</u> contact the Plant Manager, they shall notify the Plant Engineer and the Operations Manager or Superintendent. If the on-duty Alternate ERC <u>can not</u> reach the Plant Manager, Plant Engineer, Operations Manager or Superintendent then they must implement the EARP, notifying the tenants and outside emergency response agency. Then notify one of the following corporate personnel.

Corporate Contacts:	Position	Office/Cell phone numbers	
	Regional Vice President	Office:	Cell
Rachelle J. O'Dell, CISR	Claims/Risk Mgmt	Office: 402-891-2589	Cell 402-350-1421
Pete Howe	Corporate Engineer	Office: 630-262-7410	Cell 630-394-3042

OUTSIDE EMERGENCY RESPONSE NOTIFICATION:

Most ammonia situations do not require an emergency evacuation. However, emergency evacuation may be required as the result of a significant release of Ammonia or a substantial threat of an ammonia release.

In most cases fire situations require a full evacuation of the building.

Only the Plant Manager, Alternate ERC, or Plant Engineer is authorized to contact the appropriate outside emergency agency. Plus, notifying all tenants occupying space in our building. Only in the rare and extreme situation when the Plant Manager, Alternate ERC, or Plant Engineer is not available can an unauthorized worker notify an outside agency of an emergency situation.

Fire Department	911
Hazmat Team	911
Police Department	911

Millard Refrigerated Services Emergency Response Coordinator (ERC) is in charge of the situation until the Fire Department or HAZMAT team takes control of the incident. At that time the ERC and Engineer will assist the Fire Department and/or HAZMAT team in controlling and mitigating the incident.

The following script should be followed when making an OUTSIDE EMERGENCY RESPONSE NOTIFICATION.

This is Millard Refrigerated Services, at (Insert your address)
My name is (state your name)
I am the (insert your position at facility) and my phone number is (insert plant phone number and extension number if any).
I am calling to report (State the type of emergency – ammonia, fire, etc).
Emergency location in the building: (State location in the building)

Ammonia Releases (choose one):

Site Emergency: *Ammonia release has occurred and will probably not have an off-site impact* **General Emergency:** Ammonia release has occurred which will probably have an off-site impact.

Stay on the line and provide factual answers to any questions asked by the emergency operator.

911 Local Fire Dept. HAZMAT 911 911_____ Police Clinic Address: Phone: Hospital Ambulance EPA - Spill 800-424-8802 LEPC = Office of Emergency Services OSHA Office - Region # (Accidents involving death or injury to 3 or more employees requiring hospitalization must be reported within 8 hours. 1 employee in California) CO2 supplier: Phone # _____ Alarm Company Name: Phone #: Sprinkler System: Office: Plant Manager: Cell: Home: Plant Engineer: Office: _____ Cell Home: Regional Manager Office _____ Cell Corporate Engineer: Pete Howe Office 630-262-7410 630-294-3042 Cell Area Engineer: Office Cell Risk Management: Rachelle J. O'Dell, CISR Office 402-891-2589 <u>Cell</u> 402-350-1421

Emergency Phone Numbers

Non-Emergency Phone Number

Job - Specific Procedures

Job Title: General Manager and Emergency Response Coordinators

Responsibilities:

The primary ERC and the Alternate ERC (in the absence of the primary ERC) have complete authority to implement the Emergency Action/Response Plan in the event of an emergency. The ERC and the Alternate are also responsible for emergency response coordination with state and local agencies on a 24-hours basis. Upon notification of an existing, imminent or potential emergency situation, the ERC will immediately identify the character, exact source, amount and extent (area) of the release or emergency.

Upon enactment of the emergency response plan, the ERC will be responsible for:

- * Contacting the plant engineer and staying updated on the current situation
- * Determination of the need for plant or area evacuation
- * Notification of tenants, off-site responders and appropriate governmental agencies
- * Communicating with the evacuation coordinators
- * Documenting and reporting the emergency situation to corporate and governmental agencies

The plant manager will head the investigation of the incident and report his findings to corporate. Plus, if applicable will notify local, state and federal agencies as required by OSHA and EPA regulations.

Ammonia Release Post Incident Investigation (See Tab "W" of the PSM)

Job Title: Plant Engineer

Responsibilities:

- * Investigate all reported emergency situations, including ammonia incidents in a timely manner.
- * Assess the situation and communicate findings to the ERC, shut down the system if necessary or control the situation until the incident has stopped.
- * Once the situation has been controlled, actions must be taken to mitigate the damage.
- * Take atmospheric samples during ammonia releases and document results in all affected areas.
- * Work in harmony with the Fire Department and HAZMAT team.

Job Title: Operation Manager/Superintendent

Responsibilities:

Will perform the duties of an evacuation coordinator or assume the responsibility of an Alternate Emergency Response Coordinator on their assigned responsibility.

Job Title: Department Supervisors (evacuation coordinators)

Responsibilities:

- * Upon notification of an evacuation, the evacuation coordinators will evacuate all personnel from their area of responsibility in a quick and safe manner to the assembly areas.
- * Upon arriving at the assembly areas, the evacuation coordinators are responsible for conducting a head count to ensure that all personnel are accounted for.
- * Report the results of the head count to the ERC. Any indication of a missing person should be immediately reported to the ERC.

The evacuation coordinators will serve as the primary point of contact between the ERC and personnel at the assembly area. Under no circumstance should anyone return to the evacuated area without specific authorization from the ERC or the alternate.

Emergency Response Coordinators (ERC)

The primary ERC and Alternate ERC (in the absence of the primary ERC) have complete authority to implement the Emergency Action/Response Plan in the event of an emergency. The ERC and the Alternate are also responsible for communicating the emergency with all tenants and notifying the appropriate outside emergency response agencies and regulatory agencies, if necessary. Upon notification of an existing, imminent or potential emergency situation, the ERC will immediately identify the type of emergency situation and will meet the responding agency upon their arrival. This is to provide any update status information for the emergency, provide location information, building maps, P&ID's etc.

Upon enactment of the emergency Action/Response plan, the ERC will be responsible for:

- Contacting the plant engineer and staying updated on the current situation
- Determination of the need for a department or plant evacuation
- Notification of tenants, off-site responders and appropriate governmental agencies
- Communicating with the evacuation coordinators
- Developing and Documenting all reports after an emergency situation has ended

ERC's Checklist - Emergency Actions and Ammonia Releases

Date:	Incident Number			
What Happened?	Wind Direction			
	Outside Ai	ir Temp.		
	Temp. in t	he release area	l .	
When did it happen?				
Where did it happen?				
Who reported it?				
For any of the following questions answered "No", lis	t the planned	action items b	elow.	
Has facility Plant Manager been notified?	[] Yes	[] No	Time	
Has the area/plant been evacuated?	[] Yes	[] No	Time	
If evacuated, have all employees been accounted for?	[] Yes	[] No	Time	
Tenants been notified?	[]Yes	[] No	Time	
Has the Fire Dept. / HAZMAT team been notified?	[]Yes	[] No	Time	
Has the EPA and LEPC been notified?	[]Yes	[] No	Time	
Was there any injuries?	[] Yes	[] No		
ACTION ITEMS				
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EVACUATION COORDINATORS

Evacuation coordinators (typically department/area supervisors) are assigned to assist on all evacuations. The following is a list of the evacuation coordinators organized by department/area for all shifts.

Name/shift	/	dept./area	
Insert Name		Insert area of responsibility	
And Shift	/		
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The responsibilities of the evacuation coordinator are listed below:

- Upon notification of an evacuation, the evacuation coordinators will evacuate all personnel from their area of responsibility in a quick and safe manner to the assembly area.
- Upon arriving at the assembly area, the evacuation coordinators are responsible for conducting a head count to ensure that all personnel are accounted for.
- Report the results of the head count to the ERC. Any indication of a missing person should be immediately reported to the ERC.

The evacuation coordinators will serve as the primary point of contact between the ERC and personnel at the assembly area. Under no circumstance should anyone return to the evacuated area without specific authorization from the ERC or the alternate.

Emergency Coordination with Tenants

Tenant Name: Insert Tenant Name

The Plant Manager is responsible for coordinating our Emergency Action/Response Plan with all tenants occupying space in your building. The purpose of coordinating the emergency action procedures is to develop an effective communication mechanism during an emergency situation.

An emergency notification system needs to be established between Millard and all tenants to effectively communicate emergency situations. The tenants are responsible for their own Emergency Action Plan.

Communicating with the tenants on a quarterly basis will expedite the time necessary to implement the emergency plan and keep all contact information current and accurate.

The ERC or the Alternate ERC is responsible for notifying all tenants of an emergency situation.

Tenant and contact information

Shift / Contact Name/Position	/	Office/cell phone numbers
1 st /	,	<u>-</u>
1 /	/	
Alternate:	/	
2 nd /	/	
Alternate:	/	
3 rd /	/	
Alternate:	/	

Note: Complete above information for each tenant and for each shift, including weekends.

SHUTDOWN PROCEDURES (Ammonia Release) (Engineering Responsibility)

The following are general procedures for shutting down operations after an ammonia spill/release. These steps may only be performed by properly trained personnel and under the direction of the ERC. If Millard personnel are not properly trained, the local HAZMAT Team or Fire Department may perform the steps only if proper pre-emergency planning has been completed.

- 1) Locate the leak
- 2) Execute shutdown
 - * Close valve in faulty line
 - * Shut down all electrical equipment in room
 - * If leak cannot be stopped, entry is required
- 3) If entry is required, use 2 qualified people and 2 backups involving the HAZMAT Team:
 - * The following personal protective equipment may be necessary: SCBA gear, protective suits, full body harness and lifeline, and a flashlight.
- 4) Find and stop the leak using appropriate tools.
- 5) Start ventilation immediately
 - * Ventilation can be accomplished by opening doors and using ventilation fans. If the plant does not have fans on-site, they should be rented or borrowed from the fire department.
 - * Efforts must be made to protect the product from exposure to ammonia fumes. If product located near the spill is especially susceptible to damage from ammonia fumes, the product may need to be moved before starting ventilation.
 - * Water can be used to help control a small spill by absorbing the ammonia.

CONTROLLING AN INCIDENT (Engineering Responsibility)

Control of an ammonia leak will require that the leak be stopped. This is dependent upon the type of leak that occurs. It usually involves simply valving off a pipe or piece of equipment. Once the leak has been controlled, actions must be taken to mitigate the damage that can be caused by the leak. There are two basic methods of mitigation, physical and chemical methods. Physical methods of mitigating an ammonia leak include absorption and ventilation. Chemical methods include neutralization. It is likely that a combination of ventilation and neutralization will be used in the cleanup of an ammonia leak or spill.

Absorption: As a rule of thumb, one cubic foot of water can absorb 1,300 cubic feet of ammonia gas. However, to realistically use water to absorb ammonia gas, it would need to be in the form of water vapor. The only logical place this technique could be used is in the engine room. However, in practice this method is probably rarely used.

Ventilation: Positive pressure ventilation is the quickest and most effective method of mitigating an ammonia leak. Essentially, the contaminated air is displaced with fresh air being forced into the room with ventilation fans. Ventilation should be set up as soon as possible. Room temperatures must be monitored to prevent bringing the temperature up too much, which may create problems with the product being stored. An added feature of positive pressure ventilation is that the fresh air usually contains a certain amount of moisture, which helps absorb the ammonia.

Neutralization: Ammonia can be neutralized through the use of CO_2 . Simply open bottles of CO_2 into an affected room to neutralize the ammonia. The amount of CO_2 to use depends on the amount of ammonia that has leaked. It is a good idea to identify a supplier of CO_2 to be able to contact in the event of an incident.

Termination and Follow-up Action

The Authority Having Jurisdiction (AHJ) such as the Fire Department, HAZMAT Team, and or the LEPC will declare termination of the response in the case of an ammonia release.

<u>Ammonia Releases</u>: The Plant Manager will start the incident investigation (see Tab "W" of the PSM) and is required to spearhead and monitor the progress of the incident investigation to ensure it is thorough, completed in a timely manner and all follow-up recommendations are implemented.

Other Emergency: The Plant Manager will start the incident investigation and is required to spearhead and monitor the progress of the incident investigation. Ensuring it is thorough, completed in a timely manner and all follow-up recommendations are implemented.

The Plant Manager and Authority Having Jurisdiction (AHJ) will discuss any enhancement to your Emergency Action/Response Plan resulting from the emergency response. The Plant Manager will accommodate all reasonable enhancements presented by the AHJ.

All investigation reports and recommended program enhancements will be forward to and discussed with the Loss Prevention Manager.

Training:

The Plant Manager - Emergency Response Coordinators (ERC), Alternate ERC's, Evacuation Coordinators and the Plant Engineer must meet on an annual basis to review the Emergency Action/Response Plan and make any necessary changes or enhancements to the overall procedure. Annually a formal emergency evacuation drill will be conducted for every shift and include the entire facility. Tenants should be invited to participate in the evacuation drills. The annual meetings and the annual drill must be documented and any enhancements resulting from the meetings or drills must be implemented in a timely manner and all effected employees trained on the changes.

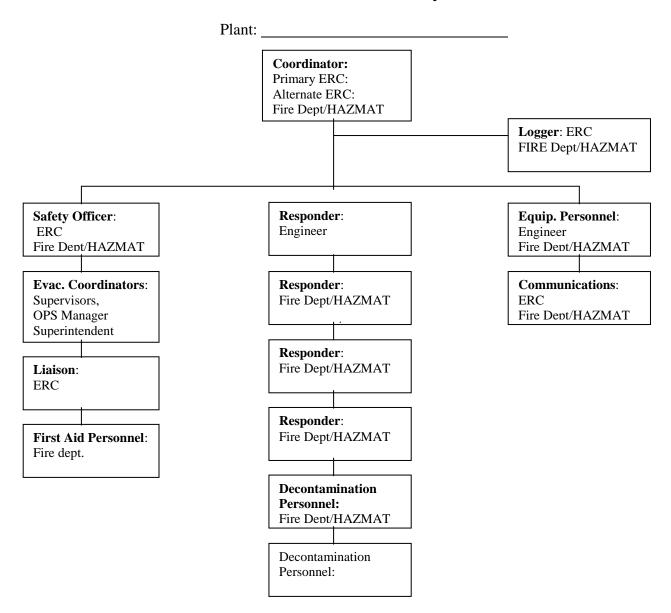
All trained 24-hour Emergency Response personnel will conduct an annual inter-department drills. The purpose of the drill is to assist the 24-hour trained personnel to prepare for potential situations. These drills will consist of:

- * Discussions of different scenarios that represent potentially real situations.
- * Donning and doffing the Air Purify Mask, SCBA, Level "A" chemical suit
- * Planning for the necessary tools, P&ID's, facility maps, etc.
- * Practice using and taking air sample readings.
- * Documenting the drill in detail and review with all involved personnel.
- * Completing the annual 24-hour refresher-training course.

The Plant Manager and/or Plant Engineer must extend annual invitation for the local fire department, HAZMAT Team and LEPC to tour your facility and discuss emergency action/response procedures. Each visit must be documented and file in Tab "X" of the PSM and in the Emergency Action/Response section of the Corporate Safety Manual.

Millard Refrigerated Services

Chart of Authority



Millard Refrigerated Services Emergency Response Coordinator (ERC) is in charge of the situation until the Fire Department or HAZMAT team takes control of the incident. At that the time the ERC and Engineer will assist the Fire Department and/or HAZMAT team in controlling and mitigating the incident.

EMERGENCY ACTION PLAN

REPORTING EMERGENCIES

All emergency situations must be reported to your immediate Supervisor, including fire, weather or ammonia leak. Your Supervisor will contact the Plant Manager and Plant Engineer to assess the situation and determine the appropriate action.

ALARM SYSTEM

When the building alarm system is activated, the emergency situation will be broadcasted via public address (P.A.) system or by another method used in this facility. You will be given instructions on what procedures to take according to the type of emergency.

FACILITY MAPS

Maps of the plant identifying the emergency escape routes that employees can take are posted on the docks and other conspicuous locations. It is your responsibility to learn the layout of the facility and the locations of the exits. It is recommended that you know at least two different ways to exit out of your work area in case your primary route is blocked by the emergency.

EVACUATING THE FACILITY

If the order to evacuate the facility is announced over the P.A. system or by another method used in this facility, follow the instructions that are given. Generally, you will leave the facility through the nearest exit and proceed to the primary assembly point located on the:

Location:
Your Supervisor will help you evacuate the facility. A headcount will be taken by the Plant Superintendent to ensure all personnel have been evacuated. The Plant Engineer will turn off all critical equipment on-site, if time safely permits.
In the event that the wind is blowing in the direction of the primary assembly point, the alternate assembly point is:
Location:

EMERGENCY PERSONNEL

Only the Plant Manager, Alternate Emergency Response Coordinator, or Plant Engineer is authorized to notify outside emergency response agencies, such as the Fire Department, HAZMAT Team or ambulance.

SPECIFIC EMERGENCY PROCEDURES

FIRE EVACUATION PROCEDURES

- 1) If the fire cannot be contained by the use of a fire extinguisher, notify your Supervisor immediately.
- 2) Your Supervisor will notify the Plant Manager and/or Plant Superintendent to assess the situation.
- 3) If an evacuation is necessary, the building alarm system will be activated and an announcement will be made over the P.A. system. Employees must use the nearest available exit and proceed to the designated assembly area.
 - Doors should be shut and office equipment turned off on the way out of the building, if time safely permits.
- 4) The Plant Engineer will be responsible for shutting down all designated machinery and equipment, if time safely permits, during the evacuation. The Plant Engineer is also responsible for ensuring that the sprinkler system is in working condition.
- 5) The Plant Manager is responsible for keeping unauthorized personnel off the premises and for routing traffic away from the facility until relieved by the Incident Commander of the Emergency Response Team.
- Truck drivers should move their units, if possible. This is necessary to prevent further property damage.
- 7) Employees are not allowed to enter the building until the Incident Commander and Plant Manager approves that the building is fit to be occupied.
- The Plant Manager shall call the Corporate Maintenance at 402-891-7036 or cell phone 402-250-1853 and Claims/Risk Management at 402-891-2589 or cell phone 402-350-1421 and Sr. VP of Human Resources 402-896-4709 or cell phone 402-709-7888 as quickly as possible and keep a record of all activity.
- 9) The Plant Manager shall protect the premises after the fire by ensuring fire protection equipment is restored to service and providing security if necessary.

Visitors, Contractors and Truck Drivers:

<u>Visitors</u> will be the responsibility of those employees they are seeing. <u>Contractors</u> are the responsibility of the Job Site Superintendent or the Engineering Department and <u>Truck Drivers</u> are the responsibility of the Evacuation Coordinators in the area of their responsibility. No persons shall leave the assembly area unless specifically authorized by the Emergency response Coordinator or his Alternate.

TORNADO/HURRICANE EVACUATION PROCEDURES

In the event of a tornado/hurricane warning by the civil defense sirens, by the news media, or by phone call, the following actions will be taken:

- 1) Employees will be notified to proceed to the designated tornado assembly area.
- 2) If time is not available, take shelter on the lowest level and keep away from windows. Under no circumstances during a storm emergency should employees remain in the product warehousing section of the building.
- 3) In buildings without storm shelters or basements, take cover in the smallest interior room with stout walls or under desks or other heavy furniture.
- 4) Since most serious injuries during these types of storms are the result of flying debris, get as close to the floor as possible and protect your face and head.
- 5) After the storm has passed, emergency evacuation procedures should be followed to determine the status of all personnel.
- The Plant Manager and Plant Engineer should compile a damage report, paying close attention to the possibility of fire, ammonia releases, flooding, or the impairment of sprinkler equipment. If the building has sustained wind damage, temporary repairs should be made to cover any openings to prevent further damage to the building and its' contents. If the Plant Manager or Plant Engineer feels that there is a question as to the integrity of the structure, they should contact the Construction Department at 402-896-6600 for further instructions.
- 7) The Plant Manager will arrange for security if necessary.

Visitors, Contractors and Truck Drivers:

<u>Visitors</u> will be the responsibility of those employees they are seeing. <u>Contractors</u> are the responsibility of the Job Site Superintendent or the Engineering Department and <u>Truck Drivers</u> are the responsibility of the Evacuation Coordinators in the area of their responsibility. No persons shall leave the assembly area unless specifically authorized by the Emergency response Coordinator or his Alternate.

FLOOD EVACUATION PROCEDURES

In planning for a potential flood, a detailed list indicating the order in which the plant operations should be shut-down, if necessary, and duties to be performed will be developed. Such duties include storage of plant equipment, especially computer equipment and the procurement and placement of sandbags at dock doors and other openings. Product and pallets stored on the dock or at floor level inside freezer doors should be moved to prevent damage from flood waters.

If an emergency crew is to remain on the premises during a flood, provisions should be made for nonperishable food, first aid equipment, lighting, communication radios, and drinking water.

When the flood waters recede, the following procedures should be performed:

- 1) An immediate damage assessment should be made with special attention given to the foundation of the plant.
- 2) An inspection should be made of the ammonia refrigeration system, sprinkler system, phone system, utilities, and any other vital system to ensure they are in proper operating condition.
- 3) Damage to the outside of the plant should be repaired as quickly as possible to prevent any further hazards to product, business, customers and employees.
- 4) Any damaged equipment should be cleaned and repaired as quickly as possible. A list of damaged equipment should be maintained for the Risk Management Department.
- 5) Drains should be cleaned to ensure sanitary operation.
- 6) Any water that entered the freezers should be removed.
- 7) Any damaged product or pallets should be removed and a list maintained to provide to customers and the Risk Management Department.

Visitors, Contractors and Truck Drivers:

<u>Visitors</u> will be the responsibility of those employees they are seeing. <u>Contractors</u> are the responsibility of the Job Site Superintendent or the Engineering Department and <u>Truck Drivers</u> are the responsibility of the Evacuation Coordinators in the area of their responsibility. No persons shall leave the assembly area unless specifically authorized by the Emergency response Coordinator or his Alternate.

EARTHQUAKE PROCEDURES

In the event of an earthquake, the following actions should be taken:

- 1) Keep calm; do not run or panic.
- 2) Stay where you are. **DO NOT ATTEMPT TO RUN OUTSIDE**.
- 3) If you are indoors, take cover under a desk, table, bench, or against inside walls or doorways. Stay away from glass windows and doors and stay out from under racks.
- 4) If you are driving a forklift, stay in the forklift. The forklift has protective equipment for falling objects.
- 5) If you are outdoors, move away from buildings and utility wires.
- 6) **DO NOT RUN THROUGH OR NEAR BUILDINGS**. The greatest danger from falling objects is just outside doorways and close to outer walls.
- 7) If you are in a moving vehicle, stop as quickly as safety permits. Do not park or stay under elevated structures. Stay in the vehicle until the shaking stops.

AFTER an earthquake, the following actions should be taken:

- 1) Check for injuries.
- 2) If necessary, the plant engineer should follow shut-down procedures.
- 3) If the earthquake was severe, follow emergency evacuation procedures to exit the plant.
- 4) In the event of a fire, the procedures for response to a fire should be followed.
- 5) The plant engineer should inspect the systems for leaks and implement all necessary emergency response procedures.

Visitors, Contractors and Truck Drivers:

<u>Visitors</u> will be the responsibility of those employees they are seeing. <u>Contractors</u> are the responsibility of the Job Site Superintendent or the Engineering Department and <u>Truck Drivers</u> are the responsibility of the Evacuation Coordinators in the area of their responsibility. No persons shall leave the assembly area unless specifically authorized by the Emergency response Coordinator or his Alternate.

AMMONIA EVACUATION PROCEDURES

Ammonia leaks may be detected in a number of ways: automatic alarm systems, visual detection of a leak, or by the odor emitted by a leak. If you smell a strong ammonia odor, you must notify your Supervisor, whom will notify the Plant Manager, Alternate ERC or Plant Engineer. An assessment must be done to determine whether an employee evacuation is necessary. Small ammonia leaks are normal in the operation of the refrigeration system and **do not** require an evacuation. Moderate and larger releases may require a department or total building evacuation. For this reason it is vital for all employees to report any ammonia odor immediately to your Supervisor and the Supervisor will immediately report the situation so it can be assessed.

In the event of an ammonia leak, which requires an emergency action/response and employee evacuation, the following actions will be taken:

- 1) The Engineer will investigate and evaluate all reported situations. The engineer will take the Air purifying respirator and the air sampling kit when responding to any reported situation. The engineer is responsible for donning the required PPE, before taking air samples.
- 2) If the ammonia sampling indicates over 50 ppm up to 200 ppm then the effective area of the release must be evacuated to a safe location in the building or outside the building. Plus, the evacuated section must be isolated and secured to prevent unauthorized entry. If the sampling indicates over 200 ppm then it may require that the entire building will need to be evacuated and secured from unauthorized entry.
- 3) Employees will be notified via alarm system and instructed over the P.A. system where to assemble before evacuating the building. **DO NOT EVACUATE INTO THE DIRECTION THAT THE WIND IS BLOWING. IF NECESSARY, LOOK AT THE WINDSOCK LOCATED ON THE ROOF TO DETERMINE WHICH WAY THE WIND IS BLOWING.** The Evacuation Coordinators will start evacuating the specific area of their responsibility.
- 4) The Plant Engineer may need to contact the Corporate Engineer for technical advice concerning the release/spill. An effort will be made to control and isolate the leak into the immediate area of the release to protect our personnel, the community and product integrity.
- 5) The Plant Manager or the Alternate ERC will notify the local HAZMAT team or local fire department. A member of the local HAZMAT Team or fire department will be considered the Incident Commander for the duration of the response.
- 6) Once the situation has been contained and the period of danger is over, the Plant Engineer will calculate the amount of ammonia released. If over 100 lbs, he will immediately notify the National Response Center, State and Local authorities of the release.

7) The Plant Manager or the Authority Having Jurisdiction (AHJ) will determine when the building or department is safe to re-entered and the normal operations resumed.

<u>Visitors</u> will be the responsibility of those employees they are seeing. <u>Contractors</u> are the responsibility of the Job Site Superintendent or the Engineering Department and <u>Truck Drivers</u> are the responsibility of the Evacuation Coordinators in the area of their responsibility. No persons shall leave the assembly area unless specifically authorized by the Emergency response Coordinator or his Alternate.

POST-INCIDENT DISASTER RECOVERY PROCEDURES

The Plant Manager following an emergency incident resulting in substantial property damage or interruption of operations should take the following steps.

- 1) Contact Lance Larsen immediately to inform him of the situation. Contact the Senior Vice President and Regional Vice President of Sales and Operations, the Corporate Manager Loss Prevention and the Corporate Engineer, if necessary.
- 2) Immediate decisions concerning personnel and operations will be identified and made.
- 3) An Action Plan will be developed for the long-term rehabilitation of the facility. Specific areas of action include:
- Notification of federal, state and local officials, if necessary.
- > Completion of a detailed incident investigation report.
- Taking statements of witnesses immediately following the incident.
- ➤ Conducting employee briefings on the status of operations.
- > Communicating with the media.
- > Communicating with customers
- Notifying insurance company of loss and preparing documentation of the incident (i.e., photographs, video tape, newspaper articles, forensic engineers, etc.).
- Assessing structural damage and protecting facility and equipment from further damage.
- Assessing status of the refrigeration system.
- Restoring fire protection to the facility.
- Providing for security of the premises.
- > Completing a product inventory.
- ➤ Identifying any legal issues associated with the incident.
- > Initiating reconstruction of the facility.
- 4) Follow-up meetings will be held as necessary to expedite the restoration of operations.

Evacuation Procedures

Post in conspicuous locations

Fire: When possible exit the building	through the nearest exit and go to the <u>primary assembly area</u>
located at the	In the event the wind is blowing
in the direction of the primary assembly	area, then go to the <u>alternate assembly area</u> at the
	<u>.</u>
Ammonia: When possible exit the b	uilding through the nearest exit and go to the <u>primary assembly</u>
area located at the	In the event the wind is blowing
in the direction of the primary assembly	area, then go to the <u>alternate assembly area</u> at the
	<u>.</u>

Earthquake: If your are indoors, take cover under a desk, table, bench or against inside walls or doorways. Stay away from glass windows, all racking systems and palletized storage. If you are driving a forklift, stay in the forklift and if possible drive away from all storage areas. The forklift is equipped with overhead protection. If you are outdoors, move away from the building, away from overhead utility wires, and away from all trailers.

Tornado and Weather-Related Event: Take shelter on the lowest level and keep away from windows, doors, all racking systems and palletized storage. A shelter would be in a small interior room with stout walls, interior corridors and when possible get under desks or other heavy furniture. Since most serious injuries during these types of storms are the result of flying debris, get as close to the floor as possible and protect your face and head.

Reporting Emergencies: All emergency situations must be reported to your immediate Supervisor. Your Supervisor will contact the Plant Manager and Plant Engineer to assess the situation and determine the appropriate action.

Alarm System: When the building alarm system is activated, the emergency situation will be broadcasted via public address (P.A.) system or by another method used in this facility. You will be given instructions on what procedures to take according to the type of emergency.

Evacuating The Facility: If the order to evacuate the facility is announced over the P.A. system or by another method, follow the instructions that are given. Generally, you will leave the facility through the nearest exit and proceed to the assembly point.