



Emergency Response Plan

Apache Nitrogen's Golden Rules

We will begin our response on the assumption that we can protect lives and property.

We will risk our lives a lot if necessary to protect savable lives.

We will risk our lives only a little and in a calculated manner to protect savable property.

We will not risk our lives at all to protect lives or property that are already lost.

Updated September 2007

Next Review: July 2008



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EMERGENCY RESPONSE PLAN

Apache Nitrogen Products, Inc. (ANPI) manufactures nitric acid, liquid ammonium nitrate, ammonium nitrate prill and liquid ammonium nitrate-based fertilizers for the mining and agricultural industries.

The facility is located in Cochise County Arizona, approximately seven (7) miles southeast of Benson and one (1) mile southwest of St. David, near the San Pedro River. It is a large-scale operation that occupies a total land area of approximately 900 acres.

The first priority at ANPI is to recognize potential hazards and take action to prevent them from becoming emergencies. The purpose of this Emergency Response Plan is to establish responsibilities and guidelines for actions in the event of an emergency.

The word "emergency" as used in this plan means a situation caused by personnel or operational accidents, fire, forces of nature, explosions, rupture of storage facilities, exposure to hazards from neighboring facilities, sabotage, war, etc. Our primary objectives in the development and implementation of this plan are:

- To prevent or minimize personnel injuries, on and off site.
- To prevent or minimize damage to the environment.
- To prevent or minimize loss or damage to Company and neighboring property.
- To immediately report Reportable Quantity chemical release incidents.

To accomplish these primary objectives, this plan seeks to accomplish the following supporting objectives:

- To assign responsibilities and duties to Emergency Response Plan personnel.
- To coordinate and use the services of emergency crews of local, state and national organizations.
- To ensure proper release of information to Employee families and news agencies.
- To re-establish normal operations as soon as possible.

This document cannot identify every possible set of circumstances and step-by-step instructions for dealing with it. Therefore, the command team has the responsibility to determine and implement the course of action that shall best protect the people on- and off-site, environment, and property involved.

The Emergency Response Plan will be reviewed by Technical Services, and interested parties annually or more frequently if necessitated by significant changes in the operation. Any changes or modifications will be issued to Plan holders identified on the Distribution page located at the front of this document.

Additional information regarding this plan and ANPI's emergency response procedures, contact the Safety Program Manager in the Sarge Gordillo Building.

In all cases, LIFE SAFETY is our first priority.



EMERGENCY RESPONSE PLAN

I. ACTIVATION OF THE EMERGENCY RESPONSE PLAN

I.A. REPORTING AN EMERGENCY

An emergency must be reported immediately to the Shift Supervisor on duty. They shall immediately become the Incident Commander. If the Shift Supervisor has been incapacitated by the emergency condition and there are no other supervisors on site, the responsibility shall pass to Operators in the following order:

- | | | |
|--------------------|---------------|---------------|
| 1. Step up Foreman | 2. Operator 5 | 3. Operator 4 |
| 4. Operator 3 | 5. Operator 2 | 6. Operator 1 |

The potential emergency response level depends upon the hazards existing on-site and off-site:

ALERT LEVEL ONE: Minor spill or leak.
No injuries, danger or disruption to operations.

ALERT LEVEL TWO: Significant spill or leak.
Minor or moderate injury or danger.
Sustained disruption of operations.

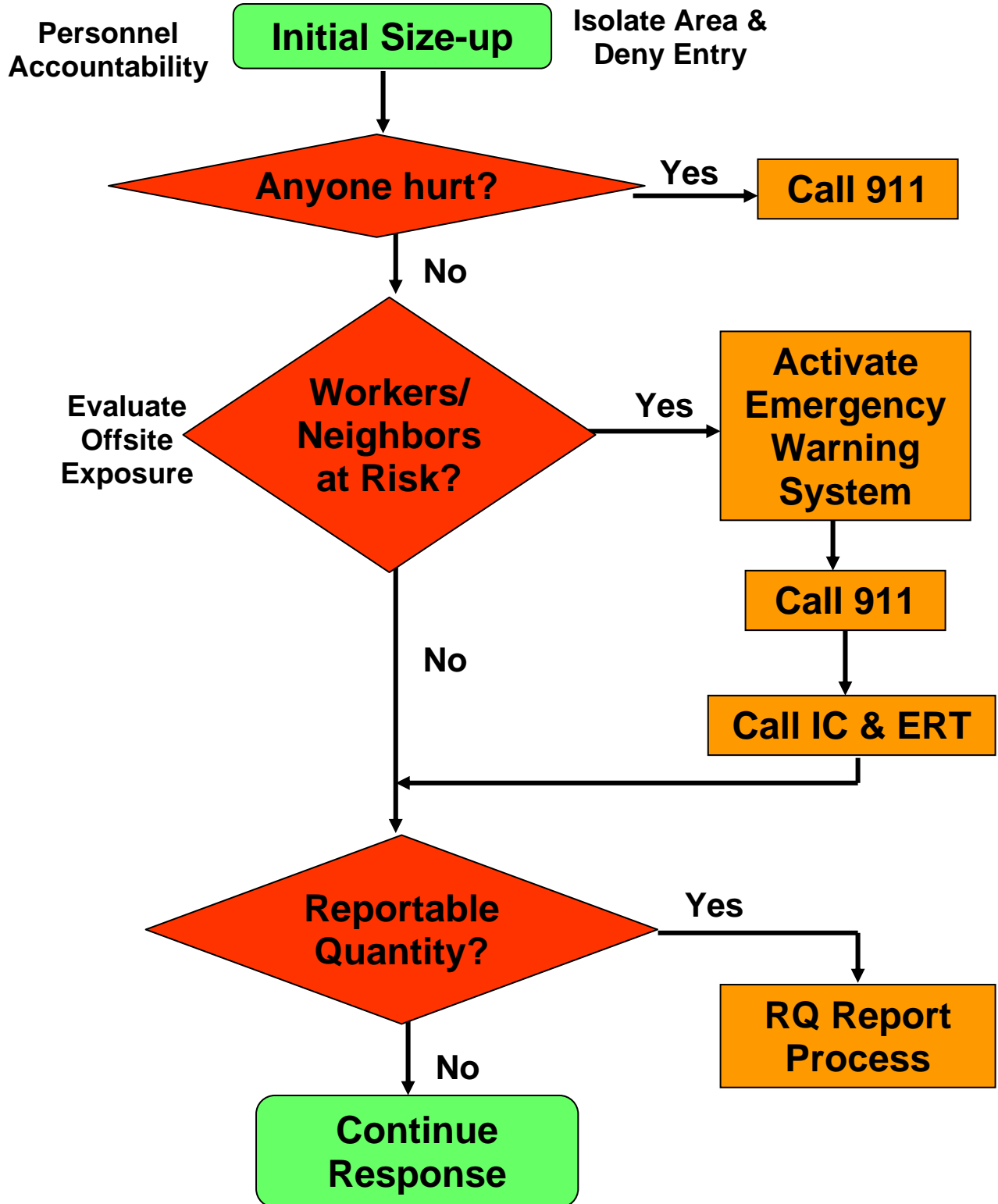
ALERT LEVEL THREE: Significant spill or leak.
Serious injury or danger.
Sustained disruption of operations.
Potential off-site impact.

Alert Level One	Alert Level Two	Alert Level Three
<ul style="list-style-type: none"> ▪ Notify Shift Supervisor ▪ Evacuate area if necessary ▪ Monitor perimeter* ▪ Control release and cleanup 	<ul style="list-style-type: none"> ▪ Notify Shift Supervisor ▪ Evacuate area if necessary ▪ Activate Emergency Response Plan ▪ Contact Security to stop traffic ▪ Monitor plant boundaries* ▪ Control release and cleanup 	<ul style="list-style-type: none"> ▪ Notify Shift Supervisor ▪ Evacuate area if necessary ▪ Activate Emergency Response Plan ▪ Contact Security to stop traffic ▪ Monitor plant boundaries* ▪ Activate siren ▪ Call Community Alert Network, Zones 1 & 5 ▪ Call 911 ▪ Notify agencies

* When there is an atmospheric release, the perimeter of the area should be monitored to determine if the release may migrate off-site. When a reading of 25 ppm or greater of ammonia is detected at the plant boundaries, then level three is required.

The flowchart on the following page shows the steps to be taken in response to an emergency.

EMERGENCY RESPONSE PLAN





EMERGENCY RESPONSE PLAN

I.B. RESPONSE TO THE EMERGENCY

Upon notification of an emergency condition, the Incident Commander shall immediately:

1. Determine location, nature, and extent of the emergency.
2. Determine whether anyone has been injured and, if appropriate, call 911 for an ambulance.
3. If existing and expected conditions put workers and/or neighbors at risk, initiate the Emergency Response Plan.
4. Isolate the area and deny entry. Warn personnel in the area and call the main gate to stop traffic from entering the Plant.
5. Initiate the Evacuation and Personnel Accountability as necessary.
6. If the emergency appears to involve a reportable quantity chemical release, initiate reportable quantity reporting within 15 minutes of *knowing* a reportable quantity release occurred in accordance with Section IX and Procedure ENV-0110 ANPI Chemical Release, Reporting, and Clean Up.
7. Initiate Incident Command Officers Call-Out as appropriate.
8. Call for Emergency Response Support Team as appropriate.
9. Initiate response by on-site First Response Team as appropriate. Take immediate action for first aid and to prevent the spread of the emergency by assigning available personnel as needed.

The following page contains a checklist for the initial response to an incident.



EMERGENCY RESPONSE PLAN

Initial Response Checklist	
	Approach the scene from uphill and upwind.
	Attempt to identify the chemicals involved from a safe distance.
	Select position at a safe distance with fast escape routes and establish command post.
	Advise other responding units on conditions and best response routes.
	If able, advise emergency response team on appropriate Personnel Protective Equipment.
	Isolate area and deny entry.
	Perform evacuation of immediate area, without causing exposure to chemicals. (DON'T GET TOO CLOSE!)
	Perform rescue ONLY if you can do so SAFELY! <ul style="list-style-type: none"> A. Be aware of the hazards involved! B. Avoid as much personal contact with victim as possible! C. Use minimum number of personnel! D. Decontaminate AS SOON AS POSSIBLE anyone exposed to chemicals or if you THINK they MAY have been exposed!
	Report all pertinent information and give an update on conditions.
	Attempt to confine the product as much as possible and protect environmental exposures, i.e., storm drains, sewers, waterways, etc.
	Determine if atmospheric release may migrate off-site. Monitor at the property boundary as necessary.
	Determine additional resources needed to help mitigate the incident.
	Assist Entry Team as needed upon their arrival.



EMERGENCY RESPONSE PLAN

I.C. ACTIVATION OF THE EMERGENCY RESPONSE PLAN

All personnel are asked to remain calm. Remember that **Personnel Safety** and **Protection of Life** are your first responsibilities. Do not take unnecessary risks.

If an explosion has occurred, seek shelter immediately to protect yourself from falling debris and possible secondary explosions. Avoid glass windows and overhead lights if possible.

Check wind direction and assume there are respiratory hazards until it is proven otherwise. If strong fumes are encountered, move crosswind and then upwind to escape. **DO NOT** rush to the scene of the emergency.

As soon as you can safely do so:

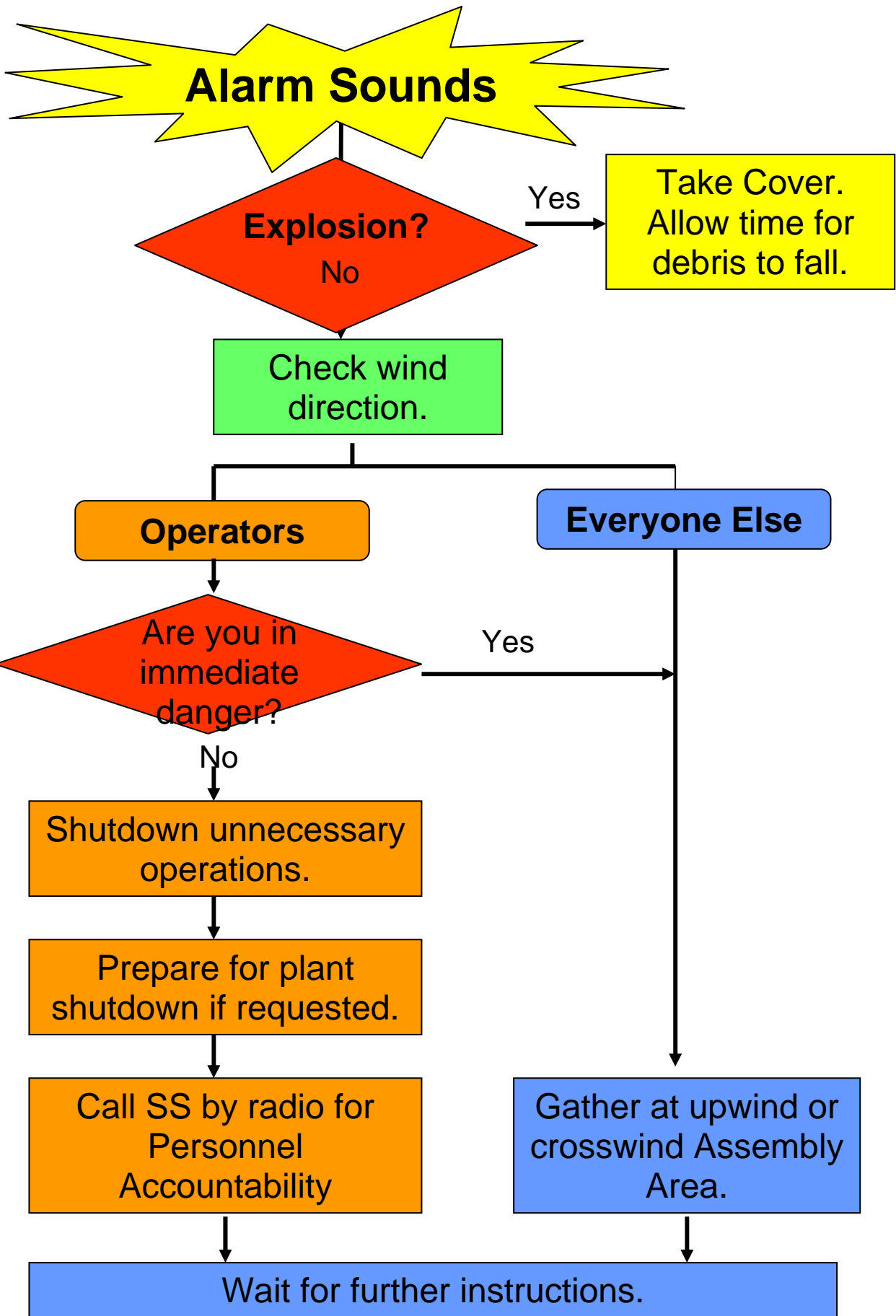
Incident Command Officers: All Incident Command Officers shall immediately report to the assembly area for personnel accountability. They must then report to the Command Center.

On-Duty Supervisors must account for personnel under their charge. As soon as possible, this information must be passed on to the Command Center through the Personnel Accountability Officer. Truck drivers and other visitors must be accounted for by name and business connection according to the Gate Register.

Operators: If you are not in immediate danger:

- (1) Immediately shut down any batching or loading operations.
- (2) Prepare to implement emergency shutdown of your plant if called upon to do so. The Incident Commander shall give you further instructions as soon as possible, by radio.
- (3) Call your Shift Supervisor by radio and give your name for Personnel Accountability. If you cannot reach your Shift Supervisor, telephone the Security Guard (2150).
- (4) If your services are **not** needed on the Plant, your supervisor shall release you from duty. When released, log out by name at Incident Command.
- (5) If you are off duty, do not rush to the Plant unless your help is requested. Remain at home near your telephone. Do not call the Plant since you could interfere with important outgoing calls.
- (6) Do not use the Plant telephone except for purposes associated with the emergency. The telephone may be needed to summon help to assist in life saving procedures, etc.
- (7) If you are called in, check-in at the main gate or other designated entrance and wait for instructions.

IMPORTANT: *The Command Center must know the location of everyone. No one should be "wandering around loose."*





EMERGENCY RESPONSE PLAN

EVACUATION AND PERSONNEL ACCOUNTABILITY

II.A. TYPES OF EVACUATION WARNINGS

There are several types of evacuation warnings at ANPI, including:

1. Pagers
2. Radio
3. Fire Alarm
4. Telephone
5. Word of mouth

The Community Alert Siren is used to alert the surrounding community in conjunction with the Community Alert Network, as described in section VII.B.

If an evacuation warning is issued, all employees will secure their work stations, turn off lights, close doors, take vehicle keys and hard hat, and immediately proceed to the appropriate assembly area.

Employees will stay assembled outside until either the all clear is given and employees can re-enter the building, or they have been directed to another location by a representative of the Incident Commander.

II.B. ASSEMBLY AREAS

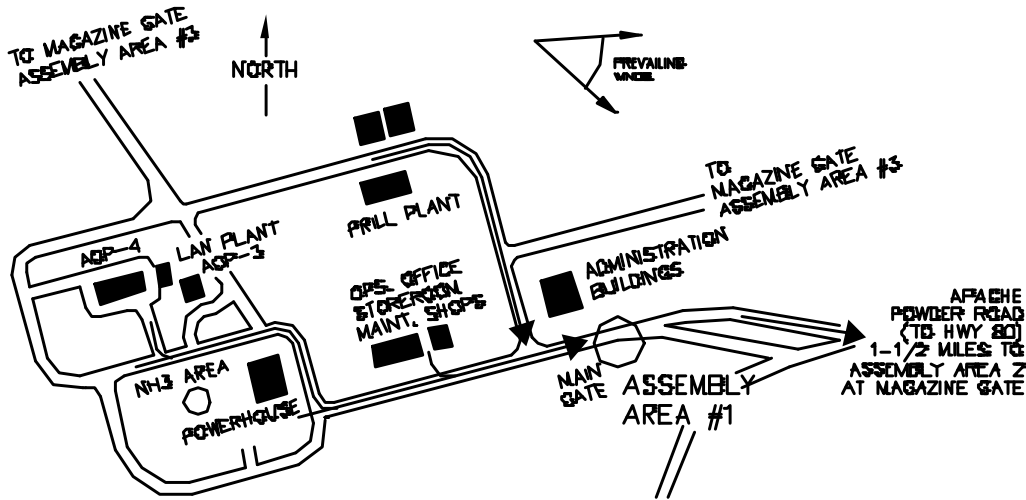
Primary Assembly Site: If conditions and wind direction allow, go to the Primary Assembly Area (Assembly Area #1) in the parking lot outside the Plant main gate.

Secondary Assembly Sites: If the primary assembly site is unavailable, or unacceptable due to exposure, wind direction, etc., one of two other secondary assembly sites are to be utilized.

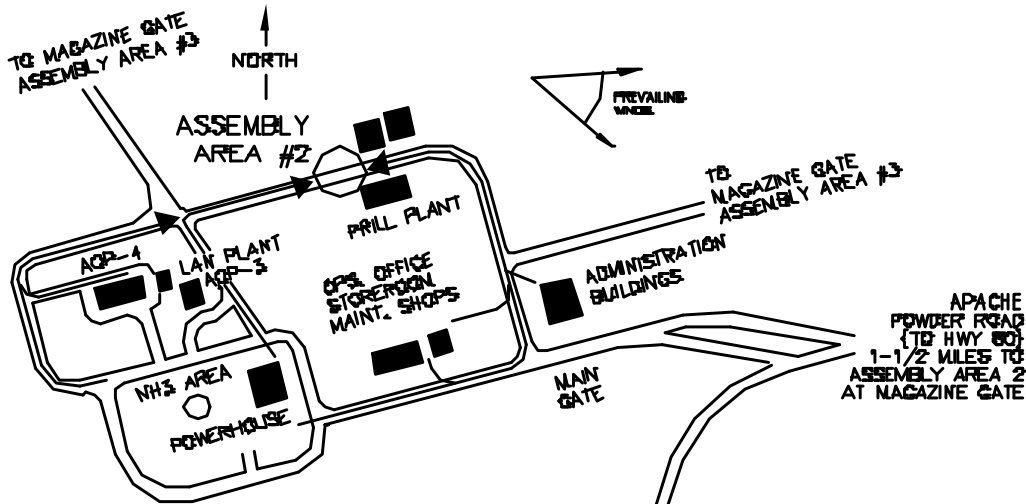
1. Prill Plant; between the Prill Plant and Barn #1 (Assembly Area #2)
2. Magazine Gate (Assembly Area #3)

The maps on the following page shows the evacuation routes.

EMERGENCY RESPONSE PLAN



APACHE PLANTSITE EVACUATION ROUTES TO ASSEMBLY AREAS #1 & #3



APACHE PLANTSITE EVACUATION ROUTES TO ASSEMBLY AREA #2

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EMERGENCY RESPONSE PLAN

II.C. PERSONNEL ACCOUNTABILITY

Area Managers or their designees will be responsible for checking their work area for employees prior to exiting the building if it is safe to do so. Area Managers or their designees will be responsible for documenting alarms and evacuations.

Personnel must report to the Assembly Area in an orderly and calm manner. Personnel shall report to their supervisor for accountability. The supervisor shall report accountability of their personnel to the Personnel Accountability Officer. The Personnel Accountability Officer shall then report plant accountability to the Incident Commander.

All non-Employees: The Operator or other responsible party must escort visitors/contractors/truck drivers to the main gate or safe assembly area.



EMERGENCY RESPONSE PLAN

III. INCIDENT COMMAND

The Incident Command Center, once established, is the location from which all incident operations are planned and directed.

If an emergency develops, response shall generally begin with limited personnel. For that reason, one person may initially perform numerous roles within the command structure. As additional resources arrive, roles will be distributed accordingly.

After evacuating, or upon arrival at the plant, all responding Employees, and Support Response Team Members are to check in with the Incident Command through their designee, or through the Guards. No one may enter the Plant without a specific assignment from the Incident Command Center.

Any responding agencies coordinate and interface operationally from this location directly through the Incident Commander.

All activities, personnel accountability, arrivals, and departures are recorded and tracked from the Incident Command Center.

III.A. INCIDENT COMMAND CENTER LOCATION

Primary Incident Command Center Location: If possible, the Command Center shall be established at the Gordillo Building Copper Room.

Alternate Incident Command Center Location: If, due to the nature of the emergency, the Gordillo Building cannot be used, the Command Center shall be established at the Magazine gate or other location determined by the Incident Commander.

The following page is a checklist to be used by the Incident Command Center to ensure that all necessary actions are taken.



EMERGENCY RESPONSE PLAN

Incident Command	
	Select Command Location (Copper Room, Magazine Gate, other)
	Ensure appointments of key positions: <ul style="list-style-type: none"> ▪ Senior Advisor ▪ Communications Officer ▪ Entry & Decon Team Leader ▪ Public Information Officer ▪ Resources Officer ▪ Environmental Officer ▪ Safety Officer ▪ Other Technical Support
	Evaluate need for Plant evacuation.
	Ensure potential off-site exposure is being monitored at the property boundary.
	Evaluate and recommend public protection action options. <ul style="list-style-type: none"> ▪ Shelter-In-Place ▪ Evacuation needed
	Ensure radio silence on designated emergency channel.
	Ensure proper head count of personnel is taken if there is an evacuation.
	Evaluate need for outside emergency assistance.
	Ensure the development of control zones and access control points.
	Ensure that proper Personnel Protective Equipment is selected and used.
	Ensure briefing of response personnel prior to entry.
	Ensure that site perimeter is secure.
	Maintain control of the movement of people and equipment within the control zones.
	Ensure that continuous medical monitoring is provided for entry personnel
	Ensure that proper phone calls and agency notifications have been made.
	Ensure debrief at termination of emergency.



EMERGENCY RESPONSE PLAN

III.B. INCIDENT COMMAND OFFICERS CALL-OUT

The Incident Commander or their designated representative shall use the Community Alert Network system to call out the Emergency Response Support Team.

The Incident Commander or their designated representative shall call out additional resources as necessary.

As the Emergency Response Support Team arrives they are briefed and responsibilities are assigned.

Note that transfer of command may take place several times. It must be done face to face in an orderly fashion to avoid confusion and loss of control. Everyone must know who is in command.

III.C. COMMUNICATIONS EQUIPMENT

Incident Command Center shall be equipped with telephone and radio communications equipment as appropriate.



EMERGENCY RESPONSE PLAN

IV. PROCEDURE FOR PERSONNEL THAT REMAIN ON PLANT

IV.A. EMERGENCY SHUTDOWN

The Incident Commander has overall responsibility for emergency shutdown procedures. Depending upon conditions, they may order a shutdown of any or all production processes.

All Employees must understand these procedures thoroughly and have had practical experience in carrying them out in daily operations. It is recognized that variations from these procedures may be necessary, depending on the conditions of an emergency. Accordingly, operating supervision, under the direction of the Incident Commander, may vary the procedures as necessary to minimize risk to personnel, environment and property.

IV.B. SPECIAL WARNINGS

All Employees are reminded that fighting fires involving ammonium nitrate is extremely dangerous and could lead to an explosion. Fighting a fire on turbo machinery is also dangerous and could result in an explosion. Fires of these types must be under the direction of the Incident Commander. Water or a fire extinguisher may be applied to a small fire. However, if the fire persists and increases in intensity, all personnel must evacuate.

Buildings and locations where ammonium nitrate may be present are the Liquid Ammonium Nitrate Plant, Prill Plant, Tank 97, Tank 82, both Prill Barns, Carbamate, Magazines and trailers loaded with ammonium nitrate or blasting agents for shipment.

Fires that arise from, or involve ammonium nitrate, usually emit brownish fumes that indicate the presence of nitrogen oxides. Breathing smoke or fumes from the fires of ammonium nitrate must be avoided.

There is a possibility of a rupture in ammonia pipelines or vessels, which could release a cloud of ammonia gas. If overtaken by such a cloud, hold your breath and move rapidly crosswind of the apparent source of the leak. Make sure you do not move toward the source of the apparent leak. Generally, you have time to reach fresh air if you keep your thoughts and move rapidly.



EMERGENCY RESPONSE PLAN

IV.C. SPECIFIC INSTRUCTIONS FOR DEFINED AREAS

1. NITRIC ACID PLANTS

Be prepared to immediately shut the Plants down if called upon to do so. Do not rush to the scene of the emergency.

In the event of a large ammonia leak or NOx release, warn those who may be affected as quickly as possible. Be prepared to don Self Contained Breathing Apparatus.

2. LAN PLANT

Be prepared to immediately shut the LAN Plant down if called upon to do so. Do not rush to the scene of the emergency.

In the event of a large ammonia leak or NOx release, warn those who may be affected as quickly as possible. Be prepared to don Self Contained Breathing Apparatus.

3. BULK PRODUCTS

Immediately shutdown all batching or loading operations. Be prepared to immediately don Self Contained Breathing Apparatus and terminate all ammonia movement if called upon to do so. Do not rush to the scene of the emergency.

4. PRILL PLANT

Immediately shutdown all batching or loading operations. Be prepared to immediately shut the Plant down if called upon to do so. Do not rush to the scene of the emergency. Be prepared to don Self Contained Breathing Apparatus.

NOTE: *If the falling film evaporator is in operation and the operators are told to leave, the operators must perform the following:*

- *Operators push E-Stop button*
- *Flood the Falling Film Evaporator*
- *Either notify a Bulk Products Operator to shutdown or shutdown themselves, the Tank 97 pump and turn on the steam.*



EMERGENCY RESPONSE PLAN

5. POWERHOUSE

- a. Activate Community Warning Sirens as defined in Section VII.A.
- b. Maintain operation of the Powerhouse equipment, but be prepared to shut down any equipment immediately if called upon to do so. Be prepared to don Self Contained Breathing Apparatus.
- c. In an emergency situation, the Powerhouse shall be the communication center until the Command Center is set up. The Operator shall answer the phone and take messages as needed.

6. MAINTENANCE DEPARTMENT

All maintenance personnel must immediately report to the assembly area for personnel accountability. After this is accomplished, they shall be assigned responsibility as needed. For example:

- a. Maintenance workers who are also Emergency Response Team members may be used in that capacity.
- b. Inspection, control and repairs to Plant utilities systems.
- c. Transportation for medical needs.
- d. The possible need for the crane, Bobcat loader and other equipment to rescue personnel who may be trapped in debris.
- e. Security guard functions as needed.
- f. Fire Brigade as needed.



EMERGENCY RESPONSE PLAN

7. EXPLOSIVE MAGAZINES

The Magazine Operator must immediately close the Magazine gate and stand guard until relieved by other designated personnel.

NOTE: *If there is a possibility of an explosion in the Magazine area, the Magazine Operator shall report to the main gate and wait there for further instructions.*

The duties involved in guarding the Magazine gate are as follows:

- a. Do not leave the gate unattended unless immediate personal peril is anticipated.
- b. Admit only persons or vehicles authorized by Incident Command.
- c. List the names of all persons and vehicles entering or leaving through the Magazine gate.
- e. Be courteous and firm with all news agency personnel, public officials, etc. Do not give out information of any kind to anyone except those who are listed in the Emergency Call-Out List contained in Section VI.

8. MAIN GATE

The Security Officer must immediately close the Main Gate and stand guard until relieved by other designated personnel.

The duties involved in guarding the Main Gate are as follows:

- a. Do not leave the gate unattended unless immediate personal peril is anticipated.
- b. Admit only persons or vehicles authorized by Incident Command.
- c. List the names of all persons and vehicles entering or leaving through the gate.
- d. Be courteous and firm with all news agency personnel, public officials, etc. Direct all media inquiries to the Public Information Officer. Do not give out information of any kind to anyone except as authorized by Incident Command.
- e. Activate the Community Warning Siren as defined in Section VII.A.
- f. Make necessary telephone calls as directed by Incident Command.



EMERGENCY RESPONSE PLAN

V. DUTIES OF RESCUE, MEDICAL, AND INCIDENT COMMAND PERSONNEL

V.A. RESCUE

If outside rescue units are on the Plant site, they shall be directed by and work with the Command Center.

V.B. MEDICAL CARE

1. In an emergency situation, outside medical units shall be summoned to care for injured personnel as needed.
2. Qualified first-aid personnel shall give medical attention under the direction of the Resources Officer.
3. All personnel are reminded that the essential elements of first-aid treatment are very important but are also relatively simple. The two most important concerns are to maintain or restore breathing, and to control serious bleeding.
4. Acid or caustic burns must be flushed immediately with cool water for at least fifteen minutes. Other types of burns should be treated with cold water or an ice pack until medical attention has arrived.
5. Patients exhibiting shock symptoms should be kept warm and as comfortable as possible until medical attention has arrived.

V.C. EVACUATION OF INJURED PERSONNEL

1. Evacuation of the injured from the Plant to the hospital shall be performed by an ambulance service.
2. Company owned vehicles may be used to transport less seriously injured personnel when approved by the Incident Commander.
3. Incident Command shall maintain a record; include names and destinations, of all people removed from the Plant site. The Communications Officer as provided through the Security Guards shall log this information.
4. Injured personnel needing hospitalization shall be taken to Benson Hospital unless directed otherwise by the medical unit in charge.



EMERGENCY RESPONSE PLAN

V.D. INCIDENT COMMAND PERSONNEL

1. INCIDENT COMMANDER

The Incident Commander has overall responsibility for the successful operation of the Emergency Response Plan.

When advised of the emergency condition, the Incident Commander must go immediately to the Command Center.

The Incident Commander is responsible for all incident activities. They shall direct the development and implementation of the Emergency Response Plan and approve decisions for the ordering and releasing of resources.

The Incident Commander shall oversee all personnel accountability actions and ensure that safety receives priority consideration.

The designated Commander will have the ultimate authority and responsibility. All other team members are to follow the Commander's directions.

Command will have access to the services of specialists such as: Safety, Environmental, Planning, Information Systems, Accounting, and Engineering.

Announcements to end the state of emergency shall be issued by the Incident Commander. If the emergency resulted in offsite consequences, the Cochise County Sheriff's Department shall issue announcements to end the state of emergency.

2. SAFETY OFFICER

The Safety Officer shall report to the Incident Commander.

The Safety Officer in the Incident Command Center shall advise the Incident Commander on an as-needed bases.

The Safety Officer shall advise regarding checking suspected areas for chemical hazards, oxygen deficiency and other risks.

A Safety Officer must also be designated in the field operation when the team responds to conditions that are, or could be, immediately dangerous to life and health (IDLH.) Any team member may serve as Safety Officer.



EMERGENCY RESPONSE PLAN

3. SENIOR ADVISOR

The senior advisor shall monitor the response to the emergency without the pressure of any other assigned responsibilities, thus providing an extra set of eyes and ears. The senior advisor shall advise the Incident Commander of any findings that could affect the plan of action.

4. COMMUNICATIONS OFFICER

The Communications Officer reports to the Incident Commander.

When advised of the emergency condition, they shall immediately report to the Command Center and set up communications systems as needed.

They shall make sure the telephone lines and radio frequencies are kept open for emergency calls. They shall handle or oversee communications into or out of the Plant.

5. PERSONNEL ACCOUNTIBILITY OFFICER

The Personnel Accountability Officer shall accumulate and organize personnel accountability information for the Incident Commander.

Throughout the incident they shall maintain or oversee a log of all persons entering and leaving the Plant, and their location on Plant.

6. SCRIBE

The Scribe shall log all activity pertaining to the emergency on paper and, if possible, on audiotape as the events take place.

7. OPERATIONS TEAM LEADER

The Operations Team Leader reports to the Incident Commander.

The Shift Supervisor is the Captain of the on-duty First Response Team made up of Operators. This team is trained for response to chemical release, fire, and medical first aid.

The Operations Team Leader shall either be the Shift Supervisor on duty or one of the Support Team Captains if the Shift Supervisor transfers team leadership responsibilities.

The Operations Team Leader shall assign roles and direct the Entry Team Efforts:

1. A Safety Officer must be designated within the team.
2. Decontamination site will be established in the warm zone.



EMERGENCY RESPONSE PLAN

A Support Team rope rescue qualified member shall have first-line responsibility when high-angle or confined space rescue is needed.

8. PUBLIC INFORMATION OFFICER

When advised of the emergency condition, the Public Information Officer shall go immediately to the Command Center.

The Public Information Officer shall coordinate activities with news media and the community.

If there are injuries, they shall establish contact with families as quickly as possible. First news reaching the families must be as factual as it can be. Therefore, no information shall be given until:

- a. Positive identification is ascertained for each casualty.
- b. It is known what is being or has been done for each person involved.

After involved families have been notified, the Public Information Officer shall release information to the news agencies.

9. STAGING OFFICER

The Staging Officer reports to the Incident Commander.

When advised of the emergency condition, the Staging Officer shall go immediately to the Command Center.

The Staging Officer shall initiate and coordinate efforts of any outside resources on an “as-needed” basis.

10. RESOURCES OFFICER

The Resources Officer reports to the Incident Commander.

When advised of the emergency condition, the Resources Officer shall go immediately to the Command Center.

The Resources Officer shall initiate and coordinate efforts of Engineering, Maintenance, and any Outside Resources on an “as-needed” basis.



EMERGENCY RESPONSE PLAN

11. ENVIRONMENTAL OFFICER

The Environmental Officer reports to the Incident Commander.

The Environmental Officer, when advised of the emergency or emergency condition, shall report to the Command Center.

The Environmental Officer shall assure monitoring of the Plant perimeter to track any release outside the property boundaries. Monitoring equipment shall be coordinated through the Incident Command Center.

The Environmental Officer shall participate in strategic planning to assure that strategic decisions represent the best choice of action from a chemical safety and environmental standpoint.

The Environmental Officer shall define procedures for containment, clean up of spills, and prescribe methods for neutralization or decontamination as needed.

12. TECHNICAL SERVICES SUPPORT

The Subject Matter Experts shall support the Entry & Decon Team Leader by providing safety and technical support specific to the plant and equipment involved in the incident.

The Technical Services Department shall be responsible for leading the investigation following the completion of any emergency response. A written report shall be created and any action items resulting from the investigation shall be documented to closure.

13. EMERGENCY RESPONSE TEAMS

Four Emergency Response Teams, made up of rotating-shift Operators, have been trained to:

- a. Respond to releases of hazardous chemicals.
- b. Respond to fires in a limited capacity. Team members shall not enter any burning structure to fight fire. Team members can respond **ONLY** to brush fires or very small structure fires with no explosive concerns.
- c. Provide basic CPR and medical first aid until Emergency Medical Services arrive.
- d. Provide Decontamination area in warm zone for those members who have been exposed to a chemical release.

The Shift Supervisor normally directs Emergency Response Teams activities.

A Safety Officer must be designated when the team responds to conditions that are, or could be, immediately dangerous to life and health (IDLH.) Any team member may serve as Safety Officer.



EMERGENCY RESPONSE PLAN

14. EMERGENCY RESPONSE SUPPORT TEAM

The Emergency Response Support Team is made up of personnel who have received the same training as the Emergency Response Support Team, and are not on duty at time of the emergency. The Emergency Response Support Team may also be called out to assist as needed.

The Shift Supervisor, who reports to the Incident Commander, shall normally direct Emergency Response Support Team activities.

As with the Emergency Response Teams, a Safety Officer must be designated when the team responds to conditions, which are, or could be, immediately dangerous to life and health (IDLH.). Any team member may serve as Safety Officer.



EMERGENCY RESPONSE PLAN

VI. EMERGENCY RESPONSE PLAN CALL-OUT LIST

	<i>Plant</i>	<i>Cell</i>	<i>Home</i>
1. Incident Commander			
R. L. Coleman	2142	975-9424	586-3110
J.W. Freeark	2118	975-9425	586-8643
S. A. Rana	2147	820-9108	762-0211
2. Safety Officer			
M.T. Moon	2119	975-9429	644-2176
S.F. Lopez	2145	975-9432	586-2406
D. W. Chapman	2194	975-9443	878-0173
3. Senior Advisor			
R. E. Cashdollar	2112	730-4111	760-3116
R. L. Coleman	2142	975-9424	586-3110
J.W. Freeark	2118	975-9425	586-8643
S. A. Rana	2147	820-9108	762-0211
4. Communications Officer			
S.F. Lopez	2145	975-9432	586-2406
G.B. Sherman	2122	975-9439	720-4360
J.J Fry	2175	975-9436	720-4745
5. Personnel Accountability Officer			
S.L. Sutton	2124	275-1770	574-7710
K.T. Smith	2121	971-9724	586-4450
6. Scribe			
G. B. Sherman	2122	975-9439	720-4360
R. H. Maxfield	2143	975-9438	212-2200
J.J. Fry	2175	975-9436	720-4745
7. Operations Team Leader (Shift Supervisors)			
D.L. Hayes	2159	975-9422	586-2971
G. A. Reyes	2161	678-7483	720-4055
D.F. Richards	2161	678-7483	586-3812
P.A. Rutherford	2161	678-7483	417-2394
R.L. Sherman	2161	678-7483	586-7962
8. Public Information Officer			
L. A. Denton	2190	975-9430	886-8027
P.J. Beilke	2114	975-9426	546-3838



EMERGENCY RESPONSE PLAN

	<i>Plant</i>	<i>Cell</i>	<i>Home</i>
9. Staging Officer			
R.H. Maxfield	2143	975-9438	212-2200
G.J. Contreras	2140		586-3743
G.B. Sherman	2154	975-9439	720-4360

10. Resources Officer			
J.W. Freeark	2118	975-9425	586-8643
P.J. Beilke	2114	975-9426	546-3838
A.J. Hunter	2123	975-9428	749-6751
R.H. Maxfield	2143	975-9438	212-2200

11. Environmental Officer			
P.J. Beilke	2114	975-9426	546-3838
D. W. Chapman	2194	975-9443	878-0173
D.L. Hayes	2159	975-9422	586-2971
G.C. Hall	2117	975-9427	720-4212

	<i>Plant</i>	<i>Cell</i>	<i>Home</i>	<i>Support Skill</i>
12. Technical Services Support				
J. W. Freeark	2118	975-9425	586-8643	Process & Eng.
D. W. Chapman	2194	975-9443	878-0173	Environmental
T.D. Hackathorn	2107	400-5440	731-9484	P&ID drawings
M.T. Moon	2119	975-9429	644-2176	Safety & Process
A.D. Brown	2192	240-7822	647-0049	P&ID drawings
S.F. Lopez	2145	975-9432	586-2406	Process & Safety

13. Emergency Response Team
On Duty Operators

14. Emergency Response Support Team
Off Duty Operators

IN-PLANT EMERGENCIES

Security	2150
Powerhouse	2151
Telephone Operator	0



EMERGENCY RESPONSE PLAN

VII. EMERGENCY WARNING ALARMS

If the Incident Commander determines that chemical release, fire or explosion could threaten our neighbors, the emergency warning plan must be initiated as follows:

1. Start the Community Warning Sirens.
2. Activate the Community Alert Network System.
3. Call 911 and describe the situation to request assistance in community evacuation, ambulance service or Sheriff assistance as needed.

VII.A. COMMUNITY WARNING SIREN

Two sirens are strategically placed to warn workers and nearby neighbors of emergencies. One is located on the hill near the water tank by the Prill Plant. The other is at the top of the hill toward the east end of the Plant.

The system is programmed for distinct tone patterns as follows:

- | | |
|-----------------------|------------------------------------------------------------------|
| General Alarm: | Traditional siren sound – pitch cycles in rise and fall pattern. |
| All Clear: | A loud steady tone. |

An emergency condition is communicated by activating the appropriate tone pattern for three minutes. This is to be done every 15 minutes.

The **All Clear** tone is sounded for three minutes to notify our workers and neighbors that the emergency condition has been resolved. *The Cochise County Sheriff Department is the only authority authorized to initiate the All Clear Siren.*

Generally, the Incident Commander requests the sirens. However, if an emergency condition develops in which it appears that timeliness is essential; any person may request the alarm is sounded.

Either the Shift Supervisor, Powerhouse Operator or Security Guard may activate the sirens using a special radio with a numeric keypad. However, if the remote activation does not work, the sirens may be individually activated from the control panel at the base of the pole on which they are mounted.



EMERGENCY RESPONSE PLAN

VII.B. COMMUNITY ALERT NETWORK (CAN) SYSTEM

The Community Alert Network system simultaneously dials multiple telephone numbers to deliver a pre-recorded message. Telephone number listings and messages are pre-recorded and registered with the Community Alert Network organization for immediate use. The system shall be activated by designated Apache Incident Command officers, Security Guards, or by the Cochise County Sheriff Department.

1. MESSAGES

A series of messages have been pre-recorded in English and Spanish and are available for immediate use:

- Shelter-in-Place
- Prepare-To-Evacuate
- Evacuate
- All Clear
- Test Message

The Cochise County Sheriff Department is the only authorized personnel to initiate the Evacuate and All Clear messages through Community Alert Network system.

2. ZONES

Any of the messages indicated above may be delivered to any of the following zones.

- Zone 1 – Neighbors living within 1 mile of our Ammonia Unloading & Storage area
- Zone 2 – to be determined
- Zone 3 – to be determined
- Zone 4 – to be determined
- Zone 5 – Emergency Response Team Support & Incident Command Officers

3. OPERATION

To activate the Community Alert Network system:

1. Determine what pre-recorded message is needed and to which group it should be sent.
2. Call Community Alert Network – 1-800-552-4226 or 1-877-786-8478 or 1-800-992-2331
3. An Incident Controller shall answer. Be prepared to give them the following information:
 - a. Your name and job title.
 - b. Community Alert Network password



EMERGENCY RESPONSE PLAN

- c. A callback number **(520-720-2150)**
- d. The zone or zones to be called
- e. New recording or pre-recorded message: **Pre-recorded Message**
- f. Repeat Option: **Yes**
- g. Initiate when: **Now**
- h. How many attempts: **Two**
- i. Fax number: **520-720-4158**
- j. Current local time

The calling shall begin almost immediately. A detailed report of calls shall be sent by FAX as soon as the calling is complete.

VII.C. TESTING OF ALARMS

The Siren and paging system are tested every Wednesday at 1:00 PM. Any defects found are repaired immediately.



EMERGENCY RESPONSE PLAN

VIII. NAMES AND TITLES OF EXTERNAL RESOURCES

In an emergency dial **911** for police, ambulance or fire department assistance.

VIII.A. MEDICAL

Benson Ambulance Service (Healthcare Innovations) 911

Benson Hospital 586-2261

VIII.B. LAW ENFORCEMENT

The Cochise County Sheriff's Department (911) has jurisdiction of the County.

Cochise County Department of Emergency Services (1-520-432-9550) shall be called in case of an incident or RQ release. This office is part of the Sheriff's Department.

The Arizona Department of Public Safety (1-520-746-4500). Liaison shall normally be maintained through the Sheriff's office, but may be done directly if the need arises.

VIII.C. GOVERNMENTAL REPORTING REQUIREMENTS

There are two circumstances under which the Shift Supervisor is responsible to immediately notify government agencies by telephone.

a. **Any emergency by which our neighbors (off-site) are at risk.**

In this situation, the Shift Supervisor shall dial 911 for immediate emergency response.

b. **Any reportable quantity (RQ) chemical release.**

If a release occurs which appears to be of reportable quantity, the Shift Supervisor must report immediately, as described in Section IX. Three telephone calls must be made within 15 minutes of **knowing** that a reportable quantity release occurred, or immediately after life and safety issues have been addressed.

As soon as possible thereafter, the supervisor shall submit a written report to the Incident Commander listing the time of the call, person spoken to, information given and instruction received. Circumstances under which notification is necessary are as follows:



EMERGENCY RESPONSE PLAN

1. Rail Tank Car Overturned:

In addition to actions appropriate for a similar leak from our storage and transfer facilities, call:

CHEMTRIC 1-800-424-9300
Arizona Corporation Commission emergency number, 1-602-542-7772.

2. Fatality Or Multiple Injuries

NOTE: The following is to be done only if an explosion, leak, etc. resulted in a fatality, or hospitalization of three (3) or more persons.

NOTE: In the event of a fatality or serious injuries as described above, the preservation of evidence is extremely important and the agencies, as approved by the Incident Commander, may be used to seal areas of concern until the investigation is completed.

Arizona Division of Occupational Safety and Health (ADOSH)
(602) 255-5795. ***This notification must be made within 8 hours.***

Cochise County Emergency Planning Committee (LEPC)
Mike Evans, Coordinator
1-520-432-9550 (business hrs.) *
or
911 (assistance needed and/or off-hours or weekend)

NOTE: The Incident Commander and Safety Officer must prepare a written report of the incident within twenty-four (24) hours after the incident.



EMERGENCY RESPONSE PLAN

IX. RESPONDING TO & REPORTING OF CHEMICAL RELEASES

IX.A. SPILL RESPONSE

Apache identifies small releases as those that do not endanger Employees or Contractors, and/or do not reach the boundary lines of Apache's property. The identified Hazardous Chemicals that are covered are:

- NO/NO₂ (NO_x GAS)
- Anhydrous Ammonia
- Nitric Acid
- Sulfuric Acid
- Sodium Hypochlorite
- Gasoline
- Hydrogen Peroxide

The Shift Supervisor on duty shall evaluate a release, and determine if it qualifies as a small release. If the release is determined to be small enough that initiation of the Emergency Response Plan is not required, the Shift Supervisor shall take actions to stop or mitigate the release in a safe and efficient manner.

Upon stopping the release, the Shift Supervisor shall determine if the release meets the criteria for Reportable Quantity (RQ) reporting based on the threshold levels.

The Shift Supervisor shall review the conditions that resulted in or caused the release to mitigate the chances that it shall reoccur.

The Shift Supervisor shall begin the process of cleaning up the release in accordance with safe work practices.

IX.B. RELEASE REPORTING

After a release or spill has been controlled, make every attempt to quickly and accurately determine the quantity involved. If a release occurs which is of reportable quantity, an initial report and notification must be made within 15 minutes of *knowing* a Reportable Quantity released occurred, or immediately after life safety issues have been addressed.

If the amount of "release" is equal to or greater than the reportable quantity discussed in the above table, then a Flash Report shall be completed.



EMERGENCY RESPONSE PLAN

REPORTABLE QUANTITIES (RQ)

Chemical	CAS #	Amount	Notes
NO/NO2 (oxides of Nitrogen gas)	10102-44-0	1000 lbs	Refer to Release Emission Rate Table
Anhydrous Ammonia	7664-41-7	100 lbs	Refer to Ammonia Relief Valve Emission Rate Table
Nitric Acid	7697-37-2	1000 lbs	154 gal (1754 lbs) of 57% 240 gal (2775 lbs) DI-AN
Sulfuric Acid	7664-93-9	1000 lbs	65 gal (1075 lbs) 93%
Aqua Ammonia	7664-41-7	1000 lbs	130 gal
Sodium Hydroxide	1310-73-2	1000 lbs	156 gal @ 50% (BC summer) 376 gal @ 25% (BC winter)
Sodium Hypochlorite	7681-52-9	100 lbs	79 gal @ 12.5% (Sani-Clean)
Gasoline (Benzene)	71-43-2	10 lbs	30 gal

The regulatory agencies listed below shall be notified within 15 minutes of **knowing** that a reportable quantity release occurred.

1. Cochise County Emergency Planning Committee (LEPC)
Mike Evans, Coordinator
1-520-432-9550 (business hrs.) *
or
911 (assistance needed and/or off-hours or weekend)

** If you leave a message, please call the Dispatch Administrator at 520-432-9501 or 9502 to provide courtesy information only.*

2. National Response Center (NRC)
1-800-424-8802
3. Arizona Emergency Response Hotline (SERC)
1-602-771-2330 or
1-800-234-5677 EXT. 2330

Be prepared to provide the following information:

- a. Caller name & telephone number.
- b. Name & address of facility.
- c. Time & type of incident (chemical release, fire, explosion).
- d. Name & quantity of substance involved to the extent known.
- e. Extent of injuries, if any.
- f. Possible hazards to human health or the environment outside property boundaries
- g. Outside assistance needed (evacuation, crowd control, etc.)



EMERGENCY RESPONSE PLAN

Before hanging up, obtain and log following information on the form.

- a. Time
- b. Name of officer with whom you spoke
- c. Their reference report number

Give only information of which you are sure. Detailed calculations and other information shall come later.

All equipment/vessels involved must be secured until necessary investigations have been made. For example, do not repair or release railcars until this is done.

X. RESPONDING TO OTHER EMERGENCIES

Other credible emergencies will be handled by utilizing the Cochise County Sheriffs Department using the 911 system or by ANPI Executive Staff decision. Examples of "other" credible type emergencies and steps to mediate are but, not limited to:

X.A MOTOR VEHICLE ACCIDENT

- Notify the Supervisor
- Safety Program Manager or Supervisor administer first aid as needed.
- Safety Program Manager or Supervisor make the decision to call an ambulance if needed.
- Initiate Incident Investigation.

X.B ARMED INTRUDERS

- Do not approach them
- Notify the Supervisor or Security Guard
- Make sure all employees are in a safe location
- Call 911 first if possible, then notify the Guard or Supervisor

X.C BOMB THREATS

- Notify all Supervisors to be on alert
- Notify a member of the Executive Staff of situation
- Call 911

X.D PROTEST GROUPS

- Maintain site security
- Security Guards do not allow anyone to enter the site
- If group becomes uncontrollable, Security will call 911 and notify member of Executive Staff



EMERGENCY RESPONSE PLAN

XI. TRAINING AND COMMUNICATION

XI.A. INCIDENT COMMAND TRAINING

Members of the Incident Command (IC) Team shall be notified of their responsibilities under the Emergency Response Plan, and trained regarding their specific duties.

Members of the Incident Command Team shall participate in annual training exercises to make them familiar with their duties.

Incident Command Team positions are designated as follows: (specific duties of each position are provided in Section V.D.)

Incident Commander	Safety Officer
Senior Advisor	Communications Officer
Personnel Accountability	Scribe
Operations Team Leader	Public Information Officer
Staging Officer	Resources Officer
Environmental Officer	Technical Services Support
Emergency Response Team	Emergency Response Team Support

XI.B. EMERGENCY RESPONSE TEAM TRAINING

Members of the Emergency Response Team (ERT), who shall be responsible for emergency rescue, and equipment/property damage mitigation, shall be trained to the level of "Site-Specific Hazardous Materials Technician" per OSHA Standards. Emergency Response Team members are operating shift personnel and perform first response duties. Emergency Response Team Support members are off duty personnel and provide backup, replacement, and any additional assignments for Emergency Response Team members.

Members of the Emergency Response Team shall participate in required training exercises to make them familiar with their duties. This also retains certification by meeting the refresher training requirements for OSHA Technicians.

XI.C. REVIEW OF PLAN WITH EMPLOYEES

The Emergency Response Plan shall be reviewed with all Apache Employees and Contractors when Employees or Contractors are hired.



EMERGENCY RESPONSE PLAN

If an Employee's or Contractor's responsibilities or designated actions change, the Employee or Contractor shall be informed of the new responsibilities or designated actions.

All Employees of Apache shall be trained regarding their designated actions during an emergency evacuation, and they shall participate in required evacuation training exercises to assure they retain familiarity with their responsibilities or designated actions.

If the Emergency Response Plan changes, affected Employees or Contractors shall be trained.

XI.D. EMPLOYEE ACCESS TO THE EMERGENCY RESPONSE PLAN

All Employees are authorized to review the Emergency Response Plan. Copies of the Plan shall be maintained in the following locations, and shall be made available to Employees to review during normal business hours or with emergency notice to a Supervisor during non-business hours.

Incident Command Center (Copper Room)	AOP-4 Control Room
Shift Supervisor's Office	BPO Control Room
Safety & Training Office	Powerhouse Control Room
Tech Services	Prill Control Room
Operations / Maintenance Office	Storeroom
Magazine Office	

The Emergency Response Plan is also available on the Technical Services Webpage and in the Approved Procedures folder on the S drive.



EMERGENCY RESPONSE PLAN

XII RELEASE OF INFORMATION

DO NOT SPREAD RUMORS. Do not give out information of any kind to anyone except those who are listed in the emergency call-out list chart.

The Public Information Officer shall handle all release of information to Employees' families, news agencies, and others. This is necessary to prevent the spread of rumors or misinformation that could lead to needless heartaches, worry, and confusion.

Media personnel shall **not** be allowed on Company property unless specifically authorized by the Incident Commander. Anyone found on Company property without authorization shall be escorted to the main gate for identification and removal. Such persons must be handled firmly but with courtesy.

XIII RESUMPTION OF OPERATIONS

When it is determined that an emergency no longer exists, the Incident Commander, shall notify all concerned to begin preparation to return to normal operations.

All equipment that *has been or could have been* affected by the emergency conditions shall be inspected thoroughly to be sure it can be safely returned to service.

Decontamination and/or chemical cleanup procedures for personnel or equipment shall be carried out by Plant supervision under the direction of the Director of Technical Services or their designee.

The recovery of facility operations and services will be based upon the extent of damage suffered to the facility. Immediately following the emergency phase of the incident, the management staff will begin implementation of the recovery plan. The CEO, Director of Operations, or Director of Maintenance will prioritize activities to be accomplished with available staff and resources.

Documentation of emergency activities is of critical importance following the emergency situation. The Incident Commander will have the responsibility of collecting all records and forms used during the incident. These are required for incident investigations, insurance claims, and potential legal actions. The Incident Commander will also prepare a report documenting activities that took place during the emergency situation for submittal to the CEO within 48 hours.

The situation will be investigated as soon as possible (within 48 hours), following its occurrence. The investigation will follow the established Accident/Incident Investigation Procedure already established at ANPI. The investigation is designed to determine why the incident occurred and what can be done to prevent recurrence. The Incident Commander is responsible for ensuring that an incident investigation is conducted following all emergency situations.



EMERGENCY RESPONSE PLAN

Following the incident, an assessment of damage, which has occurred to the facility and/or property and equipment, will be conducted. The major emphasis of this assessment will be to determine any damage to the facility, safety hazards, and repairs that must be initiated to minimize further damage and restore the facility for operational use.

The incident debriefing is utilized to inform personnel about any hazards that may still be remaining at the facility or property following the incident and to identify unsafe conditions which may exist. Some employees may be profoundly impacted from the events surrounding the incident, especially those involving injuries or loss of life. It may be necessary to provide critical incident stress debriefing sessions following such incidents.

A critique of the incident will take place to identify conditions leading to the incident and review what actions took place during the incident, both good and bad. A critique is not designed to place blame, but rather to allow for the flow of ideas and recommendations to improve the plan and the facility policies and guidelines.

For additional information related to the ANPI Emergency Response Plan contact the Safety Program Manager at 720-2119.