Calhoun Operations
Mill - Wide

Emergency Response Plan

To Report Any Emergency
Dial 7911

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Mill Wide
Emergency Response Plan

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I. Introduction

This Emergency Response Plan (ERP) provides definitions, guidance, organizational structure and procedures for handling anticipated emergencies prior to the commencement of emergency response at AbitibiBowater-Calhoun Operations. The Plan is a guide to employees, contractors, vendors and visitors to prevent injuries, reduce property loss and provide for safe evacuation. Its focus is on minimizing the impact of any potential emergencies. It is intended to be a dynamic document, one that will need to be updated to reflect changes in the mill operations over time.

This plan is also communicated to the local communities through the Community Awareness Emergency Response committee (C.A.E.R.) This committee meets on a routine basis and is comprised of representatives from Olin/Arch Chemicals, AbitibiBowater, McMinn and Bradley County Emergency Management Agencies, and the cities of Calhoun and Charleston. The C.A.E.R. committee’s goal is to preplan emergencies and provides a formal program of notification and communication for the purpose of preventing injuries in the event of a community emergency.

The Plan is structured in two major sections. The Mill-Wide ERP provides overall mill procedures which are not specific to individual departments, as well as general definitions and Mill-Wide evacuation procedures. It is supplemented by Department-Specific ERP’s, which address the particular hazards and emergency response procedures for each major operating Department. Department-specific plans have been developed for:

- Kraft Mill
- Utilities
- Paper Machines/ Finishing & Shipping (PM/F&S)
- Mechanical Pulping
- Recycle
- Chip Prep

Personnel not assigned to one of these departments shall follow the requirements spelled out in the Mill-Wide ERP.

This plan will be formally reviewed and updated at least annually. Updated copies of the Mill-wide ERP and the appropriate Department-specific ERP will be maintained electronically on the Calhoun Safety Web Page. Questions regarding the plan and its interpretation should be referred to the
Ill. Regulatory References
This ERP is based on the requirements of a number of current regulatory requirements, primarily:

- 29 CFR 1910.120 - Hazardous Waste Operations and Emergency Response, particularly paragraph (q), which provides requirements for emergency response to hazardous releases.
- 29 CFR 1910.119 - Process Safety Management of Highly Hazardous Chemicals, particularly paragraph (n), which provides requirements for emergency planning and response.
- 29 CFR 1910.38 - Employee Emergency Plans and Fire Prevention Plans, particularly paragraph (a), which provides requirements for the elements of emergency action plans.
- 29 CFR 1910.165 - Employee Alarm Systems, which provides requirements for design, maintenance and testing of alarm systems.

A reference table has been developed (See Appendix H) which shows the relationship of this Emergency Response Plan to the various applicable regulatory requirements.

III. Definitions

A. Emergency Response Team (ERT)
The overall consolidated groups in the Mill which have responsibilities for emergency planning and response, including the Emergency Operations Team, EMS/Security/Health Services, HazMat, Fire and Rescue. All ERT Team members are trained in compliance with Federal Regulations in all three disciplines (HAZMAT, Fire and Rescue).

B. Hazardous Materials Specialists
Hazardous Material Specialists (HMS) are individuals who respond with and provide support to Hazardous Materials Technicians. Their duties parallel those of the Hazardous Materials Technicians, however, these duties require a more directed or specific knowledge of the various substances they may be called upon to contain. The HMS would also act as the site liaison with Federal, State, Local, and other governmental authorities in regards to site activity. HMS shall
have received at least 24 hours of training equal to the Technician Level and in addition have competency in the following areas:

- Know how to implement the local emergency response plan.
- Understand classification, identification and verification of known and unknown materials by using advanced survey instruments and equipment.
- Know the state emergency response plan.
- Be able to select and use proper specialized chemical personal protective equipment provided to the Hazardous Materials Specialists.
- Understand in depth hazard and risk techniques.
- Be able to perform specialized control, containment, and/or confinement operations within the capabilities of the resource and personal protective equipment available.
- Be able to determine and implement decontamination procedures.
- Have the ability to develop a site Safety and Control plan.
- Understand chemical, radiological and toxicological terminology and behavior.

C. *Incident Commander (IC)*

The IC has the responsibility for overall management of any emergency incident, including a Hazmat incident. IC responsibilities include gathering and evaluating information relative to development and communication of action plans. For a Level I Hazmat incident, the Incident Commander will be the first member of the Hazmat Technician Team arriving at the scene of the incident. If the emergency elevates to a Level II incident, the IC responsibilities will pass to the most senior IC-trained member of the Emergency Response Team. The Safety Department will maintain a listing of currently qualified Incident Commanders. **Note:** The IC will assume control of the incident scene beyond the first responder awareness level and shall have received at least 24-hours of training equal to the first responder operations level and have competency in the following areas.

- Know and be able to implement the employer’s incident command system.
- Know how to implement the employer’s emergency response plan.
- Know and understand the hazards and risks associated with employees working in chemical protective clothing.
Know how to implement the local emergency response plan.
Know of the state emergency response plan and of the Federal Regional Response Team.
Know and understand the importance of decontamination procedures.

D. Emergency Operations Team (EOT)
The Emergency Operations Team provides management direction and support to the Incident Commander during an emergency incident. In addition, this team is responsible for emergency planning, logistics, and financial support for potential emergency situations. The following personnel are designated as members of the Emergency Operations Team:

- VP & Resident Manager
- Maintenance/Engineering Manager
- Production Manager-Paper
- Utilities Manager
- Manufacturing Services Manager
- Health & Safety Manager or Safety Engineer
- Production Manager-Pulp
- Technical Manager
- Human Resources Director
- Environmental Director

If an emergency occurs when none of the above team members are on the mill site, trained members of the onsite Emergency Response Team and/or the Mill Site Coordinator will assume these positions until relieved by a member of the above team.

(See Appendix A for a listing of telephone and pager numbers for the Emergency Operations Team members.)

E. Field Command Post (FCP)
A safe location established by the Incident Commander as close as practical to the emergency for the purpose of setting up field communication, equipment staging, etc.
F. Crisis Communication Plan (CCP)
The Bowater Crisis Communication Plan has been developed to assist the Incident Commander and Authorized Manager by providing a framework for timely and effective communication responses to crisis situations. Applicable sections of the Bowater Crisis Communication Plan are incorporated as Appendix B.

G. Emergency Operations Center (EOC)
The Safety Conference Room has been designated as the Emergency Operations Center for members of the Emergency Operations Team. Should this area require evacuation, the alternate EOC will be designated by the IC.

H. Mill Evacuation (ME)
A complete mill wide evacuation. All departments should shut down their operations as quickly as possible with the objective of having everyone evacuated to designated areas as soon as possible.

I. Isolated Evacuation (IE)
An isolated evacuation of certain areas depends on the circumstances and level category of an incident. Employees will be given specific directions by the IC as to where to evacuate and will not be allowed back in their areas until the all clear has been communicated.

J. Emergency Response Team (ERT)
The ERT is a specially trained group of employees who will respond to a need for emergency rescue of personnel from confined spaces, to the release of hazardous substances or other process equipment as needed and to respond to fires. All ERT Members are trained in all three disciplines.

K. EMS/Security (EMS) and Health Services (HS)
EMS/Security is the mill Security Group comprised of security personal who have Emergency Medical Technician (EMT-IV or EMT-P) certification and have also been trained in Confined Space Rescue, HAZMAT and Fire.

Health Services is the mill health care provider group comprised of RN’s, a Nurse Practitioner, and a part-time physician.
L. **Evacuation Monitor (EM)**

An individual who is designated by the Incident Commander or Department Supervisor/Team Leader at the time of the incident to assist in the orderly evacuation of their department. The EM directs departmental, contractor and visitor personnel along the selected evacuation route to the assembly point. The EM conducts a headcount and reports it to EMS/Security. All department personnel will be trained in EM duties.

M. **Chemical Release Action Levels (CRAL)**

A concentration of a chemical in air or volume of spill which is used as the basis for determining whether a release is Level I or II. CRAL’s are based on available scientific and toxicological data regarding the hazards of chemical exposure.

N. **“Buddy System”**

Means that at least two employees shall remain outside an IDLH atmosphere with SCBA’s and appropriate PPE ready to provide assistance or rescue, and at least two employees shall enter the IDLH atmosphere wearing SCBA’s and appropriate PPE. The two employees that enter the IDLH atmosphere shall remain in visual or voice contact with each other and the Operations Officer or his designee at all times.

**IV. Types of Emergencies and Response Actions**

A. **General**

AbitibiBowater-Calhoun Operations has a number of potential emergency situations. These are discussed in more detail in the Department-Specific ERP’s; below is a listing of the potential emergency situations which have been identified in the Mill.
1. **Chemical Releases/Spills**
   - Chlorine Liquid and Gas
   - Chlorine Dioxide Liquid and Gas
   - Sodium Chlorate
   - Sodium Hydroxide
   - Hydrogen Peroxide
   - Sulfuric Acid
   - Black / Green / White Liquor
   - High Volume/Low Concentration (HVLC) and Low Volume/High Concentration (LVHC) gases
   - Methanol (Methyl Alcohol)
   - Turpentine
   - Hydrogen Sulfide
   - Natural gas
   - Gasoline/fuel oil
   - Chemicals used by contractors or vendors on a trial basis

2. **Off-Site Chemical Release**
   Due to the proximity to the Arch/Olin Chemical Plant and adjacent highways and railroads, which may be used for transportation of hazardous chemicals, there is potential for a release off-site that could impact AbitibiBowater.

3. **Fire/Explosion**
   Fire in a paper mill is a constant threat and is controlled by a formal Fire Brigade organization. Examples of types of fire risks may include:
   - Paper fires
   - Turpentine
   - Hot Work (welding, cutting, brazing, etc.)
   - Log or chip fires in Chip Prep
   - Methyl Alcohol (Methanol)
   - Natural gas

   The Mill has developed a detailed procedure to be followed in responding to fires. The Mill Fire Control procedure is included as Appendix C to this plan.
4. **Confined Space Entry**
The Mill conducts entry operations into confined spaces as part of maintenance and repair activities. As part of the overall Confined Space Entry Program, a designated team of employees have been specially trained to respond to emergencies involving confined spaces and non-confined spaces where industrial rescue operations may be required.

5. **Accidental Injury and Illness**
Rapid and competent response to employee injuries is critical; equipment, training and personnel requirements are defined in Section VIII of this plan. EMS/Security and Health Services are trained to provide first aid and paramedic level treatment to injured employees and/or visitors, prior to transport to medical facilities.

6. **Weather Emergencies**
Weather emergencies involve high wind, tornado, and severe thunderstorms. The weather is monitored daily by EMS/Security personnel through the Data Transmission Network (DTN) Weather Monitoring System located at Gate 4. Should a severe weather event occur such as a tornado watch, EMS/Security will issue a warning announcement over the Mill radio (All 16 channels), and via e-mail. If a tornado **warning** has been issued (*a tornado has been spotted on the ground or in the air within a 5 mile radius of the Calhoun Mill and is traveling toward the mill*) employees will be instructed to take shelter. EMS/Security will make notifications via the Mill radio (all 16 channels), via e-mail, Gai-Tronics Alarm System, and by “rampage: Technology using the ALL_EMERGENCY - Emergency Notification Trigger Page.

Storm shelters have been designated and visibly marked throughout the mill. The locations for these shelters are included in Appendix D to this plan and are also listed in each Departmental Emergency Response Plan. Upon receiving notification of a tornado **warning** for the mill area, all personnel including contractors and visitors should enter the nearest shelter and remain there until the all clear is communicated.
The only exception would be personnel assigned to critical tasks as designated in the department specific plans.

7. **Terrorism Threats**

Should anyone receive a call indicating some act of impending terrorism such as a bomb, arson, acts of violence including civil unrest, the person taking the call should remain calm and take specific notes while keeping the person on the line as long as possible. Try to determine the specific location of the threat and time of event. Listen for background noises and any peculiarities in the caller's speech. After the caller has hung up, call **7911** and advise the officer on duty of the call. Remain at the extension where the call was received until an EMS/Security Technician arrives and takes the information on the call. The Emergency Response Team will be activated and the Incident Command System initiated. The area will be evacuated and access controlled from a safe distance at a minimum of 100ft., depending on the location of the bomb threat. The Local County Sheriff's Office along with the nearest qualified agency will be called.

Refer to the terrorism section included as Appendix E to this plan for additional guidance and action steps.

8. **Radiation Sources**

The mill utilizes radiation sources for various process controls such as level indicators and material flow. Should an event occur such as an explosion, fire or physical contact from an accident, the following actions should be implemented:

1. Clear the immediate area of personnel.
2. Identify the source, the strength and the “rope off distance”. The location, strength and rope off distance for these sources are included in Appendix F to this plan.
3. Rope off area in all directions with red Danger tape or Radiation tape at the proper distance.
4. Call Security, advise them of situation and have them call the Radiation Safety Officer.
5. Keep the "rope-off " area clear of personnel until the source has been checked and secured by the
B. Emergency Response Actions

1. For emergencies involving uncontrollable releases of certain types of hazardous chemicals, the response to the emergency is based on the measured levels of the released chemicals. (see below). The following Chemical Release Action Levels (CRALS) have been established as a guide to aid in determining the emergency response actions to be initiated based on a Level I or Level II emergency.

### Chemical Release Action Levels (CRALS)

<table>
<thead>
<tr>
<th>Chemical</th>
<th>Level I</th>
<th>Level II</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chlorine</td>
<td>More than 5 ppm in the atmosphere during an uncontrolled spill or release</td>
<td>Release may have an impact on entire mill or community.</td>
</tr>
<tr>
<td>Chlorine Dioxide</td>
<td>More than 2.5 ppm in the atmosphere during an uncontrolled spill or uncontrolled continuous release of more than 25 gallons of solution</td>
<td>Release may have an impact on entire mill or community.</td>
</tr>
<tr>
<td>Methanol</td>
<td>More than 10% LEL or uncontrolled continuous release of more than 25 gallons</td>
<td>Release may have an impact on entire mill or community.</td>
</tr>
<tr>
<td>Sodium Chlorate</td>
<td>Uncontrolled continuous release of more than 25 gallons.</td>
<td>Release may have an impact on entire mill or community.</td>
</tr>
<tr>
<td>Sulfuric Acid</td>
<td>Uncontrolled continuous release of more than 25 gallons.</td>
<td>Release may have an impact on entire mill or community.</td>
</tr>
<tr>
<td>Hydrogen Peroxide</td>
<td>Uncontrolled continuous release of more than 25 gallons.</td>
<td>Release may have an impact on entire mill or community.</td>
</tr>
<tr>
<td>Turpentine</td>
<td>More than 10% LEL or uncontrolled continuous release of more than 25 gallons.</td>
<td>Release may have an impact on entire mill or community.</td>
</tr>
<tr>
<td>Foul Condensate</td>
<td>50 ppm of H₂S or uncontrolled continuous release of more than 25 gallons.</td>
<td>Release may have an impact on entire mill or community.</td>
</tr>
<tr>
<td>TRS Gases/H₂S</td>
<td>More than 50 ppm</td>
<td>Release may have an impact on entire mill or community.</td>
</tr>
<tr>
<td>Sodium Hydroxide</td>
<td>Uncontrolled continuous release of more than 25 gallons.</td>
<td>Release may have an impact on entire mill or community.</td>
</tr>
</tbody>
</table>

Note: Uncontrolled is defined as not draining to the chemical sewer or cannot be shut off by a pump motor, valve, etc. Gas vapors can still not exceed CRALS. Although the Mill uses many different chemical materials, the ten materials listed above were selected to represent the greatest potential for employee harm and environmental impact in an emergency situation.
2. Other Emergency Response Actions

<table>
<thead>
<tr>
<th>Emergency</th>
<th>Level I</th>
<th>Level II</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fire/Explosion</td>
<td>All Fires/Explosions</td>
<td>May effect entire mill or community</td>
</tr>
<tr>
<td>Weather</td>
<td>Tornado spotted on the ground within a 5 mile radius toward mill</td>
<td>Tornado damages a process area</td>
</tr>
<tr>
<td>Bomb/Terrorism</td>
<td>Threat effecting one immediate area</td>
<td>May effect entire mill or community</td>
</tr>
<tr>
<td>Radiation Leakage</td>
<td>Isotope Leakage</td>
<td>Catastrophic release or multiple unit failure.</td>
</tr>
</tbody>
</table>

C. Chemical Emergency Response

It is critical for the safety and health of employees who may be required to enter an area where there may be a hazardous gas or chemical to know, understand, and utilize proper personal protective equipment. This equipment will include proper respiratory protection and other PPE to protect the employee from potential exposure.

When a hazardous material release is reported, the Incident Management System will be implemented and steps taken to have EMS/Security or other trained personnel don positive pressure self contained breathing apparatus and utilizing the "Buddy System", measure airborne concentrations with direct reading instrumentation and make visual observations of the release situation. Based upon the preliminary evaluation, the IC will determine if the incident qualifies as a Level I or II response and implement the appropriate response procedures listed in the departmental response plan in order to properly respond to chemical releases and to determine the actions, including evacuation, which may need to be taken by non-responder personnel.

Based on measured airborne concentrations of a chemical hazard the Incident Commander will be responsible to determine when Self Contained Breathing Apparatus may be removed.

Not all-chemical releases may result in a Level I emergency. However, if chemical releases exceed the established Threshold Limit Values, but not the CRALS, the employees will be required to wear proper respiratory protection and other required PPE. (For training
and proper use requirements see the Respiratory Protection and Personal Protection Policies)

There are two types of emergency evacuation:

1. **Local** - Level I emergencies may require evacuation of the immediate affected area and other impacted areas downwind of the release, fire/explosion. Detailed instructions for this level of evacuation are included in each Department-Specific Emergency Response Plan. Procedures for safe and orderly shutdown of critical equipment are also detailed in the Department-Specific ERP. All Mill Evacuation Assembly Points are in compliance with the Table of Initial Isolation and Protective Action Distances as published in the 2000 Emergency Response Guidebook, U.S. Department Of Transportation. *(based on Chlorine @ 900 ft.)*

**ALARMS AND MONITORS:**

*Stationary monitors* are located in several areas of the Chem Prep, Kraft Mill bleach plant, Power and Steam filter plant, evaporator, waste lift and dewater areas and are identified with a warning sign. These alarms have a beacon light and an audible horn which activates when the level of the particular gas reach the Short Term Exposure Limit (STEL). The chart below lists STEL and IDLH (immediately dangerous to life or health) for these chemicals.

**Stationary Alarms**

<table>
<thead>
<tr>
<th>Area</th>
<th>Chemical Monitored</th>
<th>STEL (ACGIH)</th>
<th>IDLH (NIOSH)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chem Prep</td>
<td>Chlorine Dioxide (ClO₂)</td>
<td>0.3 ppm</td>
<td>5 ppm</td>
</tr>
<tr>
<td>Kraft Mill</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Filter Plant</td>
<td>Chlorine (Cl₂)</td>
<td>1 ppm</td>
<td>10 ppm</td>
</tr>
<tr>
<td>P&amp;S evaporators</td>
<td>Hydrogen Sulfide (H₂S)</td>
<td>15 ppm</td>
<td>100 ppm</td>
</tr>
<tr>
<td>Waste Lift</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Dewater Plant</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Stationary Alarms

EMERGENCY AWARENESS ACTIONS:
If any stationary monitor alarms (beacon light and horn), or if you see or smell any hazardous gases or if you experience any irritation of your eyes, nose, throat, or lungs, put on your escape respirator and leave the area. Note the wind direction and head crosswind then upwind for at least 50 feet. Be sure that you are in a safe area before you remove your escape respirator. Notify your supervisor. Take no further action. Stay out of the immediate hazardous area until you are notified that it is safe to return.

2. Mill-Wide - Level II emergencies may require the initiation of a Mill-Wide evacuation and may have an impact on the local communities. These procedures are detailed below. For those departments, which do not require Specific Emergency Response Plans, personnel should follow the procedures in this section.

D. Site Control - The purpose of site control is to minimize potential contamination of workers, protect employees from the site’s chemical and physical hazards, and facilitate HAZMAT work activities. The Incident Commander is responsible for site control and will establish Site Work Zones as described below:
1. **HOT ZONE** - The contaminated area. The boundaries of the HOT ZONE will be marked with RED Barricade Tape.

2. **WARM ZONE** - The area where decontamination activities take place. This area should be completely free of the contaminate and will be continuously monitored. If the chemical hazard is detected then the HOT Zone will be enlarged and the WARM ZONE moved back until no contaminate is detected. The boundaries of the WARM ZONE will be marked with YELLOW Barricade Tape. (No employee shall remove their SCBA until entering the WARM ZONE and after decontamination.)

3. **COLD ZONE** - an uncontaminated area where employees should not be exposed to the hazardous conditions. The boundaries of the COLD ZONE will be marked with GREEN Barricade Tape.

Establishment of WORK ZONE boundaries shall be based on air monitoring results and on an evaluation of potential routes and the amount of contaminate dispersion in the event of the release. Personnel and equipment movement among these zones will be through specific Access Control Points.

V. **Mill Emergency Response Team (MERT) Organization**

The organization of the Mill Emergency Response Team is based on establishment of specialized teams who are trained to assess and properly respond to emergencies throughout the Mill. The Hazmat Team, the Fire Brigade, Rescue Team, EMS/Security/Health Services make up the ERT and the Emergency Operations Team is the management wing of emergency operations.

Depending on the nature of the emergency situation, the appropriate emergency response personnel will be activated by using the “rampage” technology:

- EOTEAM - Emergency Operations Team
- ERTEAM - Emergency Response Team
VI. Emergency Alarm /Notification

**General** – All employee alarm system circuitry, which is capable of being supervised, will be supervised and will provide positive notification to assigned personnel whenever a deficiency exists in the system. All supervised employee alarm systems will be tested at least annually for reliability and adequacy.

**A. The mill wide emergency alarm notification system consists of the following:**

1. **Mill whistle**
   - The Mill Whistle is used to alert all personnel of a Mill Evacuation, the need to respond to a fire or for “other emergencies”. For any emergency, dial 7911 and communicate the situation to EMS/Security Tech. Three distinctive codes will be used to indicate the type of emergency that is occurring:

   **Mill Whistle Codes**

<table>
<thead>
<tr>
<th>Emergency Type</th>
<th>Mill Whistle Code</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mill-Wide Emergency Evacuation</td>
<td>One short blast, repeated intermittently for three minutes</td>
</tr>
<tr>
<td>Fire</td>
<td>Two short blasts, repeated intermittently for one minute</td>
</tr>
<tr>
<td>Other Emergency</td>
<td>Three short blasts, repeated intermittently for one minute</td>
</tr>
<tr>
<td>All clear</td>
<td>One long blast for 30 seconds.</td>
</tr>
</tbody>
</table>

All personnel, upon hearing the Mill Whistle alarm, are to contact department supervision or monitor Mill Radio on Channel 1 or 2 for further details.
2. **Gai-Tronics**

Gai-Tronics is an integrated Communications System consisting of loud speakers, strobe lights, and call phones to allow the broadcasting of Emergency messages.

This automated alarm system works in conjunction with the Mill Whistle and automatically sounds an alarm followed by a prerecorded emergency message.

EMS/Security will broadcast detailed emergency instructions over this system as soon as possible.

3. **Mill Radio**

The third means of notification is the two-way radio. EMS/Security will broadcast on all mill channels the type, location, and evacuation requirements for a given incident.

If a Fire emergency occurs, the EMS/Security Tech will broadcast the location of the fire, on channels 1 and 2. Mill Fire Brigade members will respond to the area with appropriate fire fighting equipment.

After initial notification, channels 1 and 2 are reserved for use by EMS/Security and Emergency Response personnel. (The Incident Commander will communicate with HAZMAT, Fire Brigade, and Confined Space Rescue Teams by using Mill Radios.)

4. **Pager**

The fourth means of notification is the paging system. Members of the Emergency Operations Team (EOT) and Emergency Response Team (ERT) will have pagers on their person at all times. Using the "rampage" technology, a message will be sent to the ERTEAM - Emergency Response Team Trigger Page and the EOTEAM - Emergency Operations Team Trigger page.
Also many mill employees have pagers. A message detailing the emergency will be sent using the “rampage” technology to ALL_EMERGNCY – Emergency Notification Trigger Page.

5. **Phone**
The Mill telephone system should be reserved for use during an emergency by EMS/Security and the Emergency Operations Team. All other personnel should refrain from using the telephone system so that it is available for critical communications. In particular, do not use the telephone to contact EMS/Security or Health Services. The telephone is also the primary means of communicating with outside parties, such as local fire and emergency services.

### VII. Mill Evacuation Procedures

There are two types of emergency evacuation:

1. **Local** - Level I emergencies may require evacuation of the immediate affected area and other impacted areas downwind of the release, fire/explosion. Detailed instructions for this level of evacuation are included in each Department-Specific Emergency Response Plan. Procedures for safe and orderly shutdown of critical equipment are also detailed in the Department-Specific ERP. All Mill Evacuation Assembly Points are in compliance with the Table of Initial Isolation and Protective Action Distances as published in the 2000 Emergency Response Guidebook, U.S. Department Of Transportation. *(based on Chlorine @ 900 ft.)*

2. **Mill-Wide** - Level II emergencies will require the initiation of a Mill-Wide evacuation and may impact the local communities. These procedures are detailed below. For those departments, which do not require Specific Emergency Response Plans, personnel should follow the procedures in this section.

#### A. Procedures for Level II Emergency Evacuation and Shutdown

1. **Incident Commander:**
   Decide, in consultation with available members of the EOT, if circumstances warrant shutdown and evacuation. If so, notify the EMS/Security Officer, Main Gate, to sound the Gaitronics
Emergency Alarm System to alert all respective departmental personnel to begin evacuation. The IC will, if possible and feasible coordinate all emergency operations from the Emergency Operations Center. The IC will, with input from Emergency Response Team members at the site, provide direction as to the best options for emergency escape and assembly, this information will be communicated to all departments as outlined below.

2. **Security Officer, Main Gate:**

Sound emergency evacuation alarm with the Mill Whistle (one short blast, repeated intermittently for three minutes). This will automatically initiate the Gai-Tronics Alarm System.

Broadcast the status of the emergency over all Mill Radio channels.

Broadcast the Emergency Evacuation information by using the Mill Wide page on Gai-Tronics Alarm System.

Broadcast the status of the Emergency, and any evacuation information over all 16 Mill radio channels.

Using “rampage” technology send a emergency page containing the status of the emergency, and any evacuation information to:

ALL_EMERGCY - Emergency Notification Trigger Page

Initiate EMS/SECURITY GUIDELINES MANUAL Sections III, IV, and VI, procedures to control access at all mill entrances. Take needed steps to prevent individuals from entering the mill through unauthorized entrances.

Notify police or McMinn/Bradley County EOC as needed to control incoming traffic flow at the following points:

- Utilize the Community Awareness Emergency Response Notification form
- Charleston side of the Hiwassee River bridge (HWY 11)
- Both intersections of HW 163 and HWY 11
- HWY 163 and County Road 35
Set the HWY 11 traffic light at the mill entrance to a flashing yellow condition. Implement the Crisis Communication Plan as necessary.

3. Emergency Operations Team

Implement the Crisis Communication Plan and contact local community leaders as outlined in the Community Awareness Emergency Response Manual (C.A.E.R.). Provides emergency logistics and planning support to the IC.

4. Departmental Supervision/Team Leader:

Each departmental supervisor or Team Leader on duty is to execute prepared shutdown and evacuation procedures. Designate an Evacuation Monitor. Ensure all personnel in the area, including contractors and vendors, are notified and instructed as to proper evacuation routes and assembly points.

5. Evacuation Monitor:

Ensure that all departmental personnel, contractors and visitors have left the area. Conduct headcount at the designated assembly points and report headcount status to EMS/Security using mill radio channel #1. Ensure all assembled individuals stay at assembly point until the “all clear” has been given.

B. Evacuation Assembly Points

The following areas are possible assembly points for mill personnel during an evacuation condition. The specific set of assembly points appropriate to a given emergency condition will be determined by the IC and the Emergency Operations Team and relayed by radio and computer terminal to all departments.

**ASSEMBLY POINT A.** Exit the Contractor or Main Gate, proceed south along Hwy. 11 across bridge.

**ASSEMBLY POINT B.** Recreation Area Parking Lot via the railroad tracks under U.S. Highway 11 Bridge, or via the Main Entrance to the mill.
ASSEMBLY POINT C. Exit North Gate behind the Kraft Mill, go through parking lot and proceed north along Hwy 11 to the Employee Credit Union Area.

ASSEMBLY POINT D. Wood Truck Road entrance.

ASSEMBLY POINT E. Exit north toward Recycle; continue on road to gate at Hwy. 163.
EVACUATION ASSEMBLY POINTS

A  EXIT THE CONTRACTOR OR MAIN GATE SOUTH ALONG U.S. HWY II ACROSS BRIDGE
B  RECREATION AREA PARKING LOT VIA THE RAILROAD TRACKS UNDER U.S. HWY II BRIDGE, OR VIA THE MAIN MILL ENTRANCE
C  EXIT NORTH GATE BEHIND THE KRAFT MILL & PROCEED TO EMPLOYEE CREDIT UNION AREA
D  WOOD TRUCK ROAD ENTRANCE VIA MILL ROAD LEADING TO THE COAL YARD
E  EXIT NORTH TOWARDS RECYCLE, CONTINUE ON ROAD TO GATE AT STATE

March 2003

Figure 9


C. Assembly Area Inventory

Each department will appoint an Evacuation Monitor (EM). When each department's Evacuation Monitor arrives at the designated assembly point, they will make an inventory of departmental personnel, including contractors and visitors from their area. The Evacuation Monitor will notify the EMS/Security Officer, Main Gate by Mill Radio of personnel who are not at the assembly point. All personnel are to remain at the evacuation assembly point until receiving further directions from the Mill's EMS/Security personnel or the "All Clear" is sounded. Evacuation routes will be followed as designated in the Mill Evacuation Map (See Figure 9) More detailed maps of each major department evacuation routes are included as Appendix G to this plan and in each Department-specific plan.

D. Procedures for Responding to Off-Site Impacts

When the source of the emergency is an off-site event, such as release of hazardous material from a rail car, truck or the adjacent Olin/Arch plant, the procedures for responding will be somewhat different than for an on-site release.

- Notification will normally be made to EMS/Security, who should gather and record as much information as is available and immediately notify the EOT to gather at the designated Emergency Operations Center.
- The Incident Commander is the highest-ranking IC-trained member of the Emergency Response Team on site.
- EMS/Security should begin monitoring of the wind speed and direction, providing information to the IC/EOT at least every five minutes. As directed by the IC, EMS/Security may be assigned to collect air quality data at strategic locations.
- The ERT should be activated, procure emergency equipment and prepare to take actions as directed. Trained ERT members may be staged at strategic locations or used to collect air quality data at the direction of the IC. (appropriate respiratory protection must be used)
- Depending on the type of release, the IC will determine the need for partial or complete Mill Evacuation. In cases where the levels of contaminant do not exceed Level I CRAL's at the plant
boundary, the appropriate action may be to stay in place and shut down air handling systems until the air clears.

VIII. Medical Support/ First Aid

Emergency medical support is provided by Bowater EMS/Security/Health Services. Notification to EMS is made by dialing in-mill “7911”, and providing available information regarding the injury or injuries, location and contact person. In the event of a Level I or Level II emergency, the IC should communicate to EMS/Security regarding any known injuries at the same time that the emergency is being reported.

Typical responsibilities of the EMS/Health Services staff include:

- Nurses- Provide first aid and medical treatment to injured personnel based on instructions (standing and direct) from the plant physician.
- Emergency Medical Technicians using the plant ambulance, proceed to the closest safe location in order to evaluate the injury, stabilize the patient and transport to the local medical unit. Maintain the plant emergency medical equipment in top response condition.
- Plant Physician- Provide overall direction to the EMS and Nurse personnel; ensure that local medical providers are informed, trained and equipped to manage typical medical emergencies from the plant (gas exposure, acid or caustic burn, etc.)

Outside Medical Support is coordinated by EMS/ Security/Health Services, including air transport. Helicopter transport is available from Chattanooga; the landing zone for such transport has been designated as the baseball field across Highway 11 or, alternatively, at the Recycle Plant.

IX. Contractor/Vendor/Visitor Management During Emergencies

A. Contractors

It is critical that the location and activities of contractors be known at all times so that evacuation warning and accounting of such personnel can be accomplished. All contractor personnel must be provided training by their companies before entering the facility for the first time and annually thereafter to ensure they are familiar with these procedures. The following steps will be taken:
Mill Wide
Emergency Response Plan

1) Contractor supervisors are required to maintain a list of their personnel who are on the Mill property at all times.

2) Upon reporting to the specific work site in the Mill, the individual contractor workers or their supervisor will sign in on a log maintained at a specified location in each department (usually the control room). When and if contractor workers leave the departmental area, they will sign out. If their work assignment is in a new department, they will sign in at the new department location.

3) In the event of a Level I incident, the IC (through the Department Supervisor/Team Leader and/or Evacuation Monitor) will advise the contractor employees of the need to evacuate the area and which evacuation route to use.

4) In the event of a Level II incident, the IC (through the Department Supervisor/Team Leader and/or Evacuation Monitor) will notify the contractors working in the department of the need to evacuate to a specified Assembly Point, using a specified evacuation route.

Note: Permanent contractor companies must have radios which can monitor Mill radio Channel 1 or 2 or have their own Mill radio channels, or provide to EMS/Security and Safety Departments an alternate method of communication (i.e. cell phone). Therefore, these personnel should monitor the Mill Radio for instructions after hearing the Mill whistle or Gai-Tronics alarms.

5) After evacuation, the Evacuation Monitor will account for all contractor personnel listed in the sign-in log for the department, notifying EMS/Security of any contractor personnel who cannot be accounted for.

B. Vendors/Visitors

Vendors/Visitors are personnel who enter the Mill to conduct routine business, such as servicing operations or sales. All vendors/visitors will be provided with training on emergency procedures prior to entering the Mill and annually thereafter (if their duties are long-term). This training is included in the Visitor Safety Orientation Film. Trained vendors/visitors will be given personalized cards attesting to training provided and vendors/visitors unable to provide such proof of training will not be allowed to enter the Mill until retrained. In addition, the following steps will be taken:

1) Vendors/Visitors will sign in and out with Security. The Visitors Register will record the vendor company name, vendor employee(s) name, and specific location in the Mill to be visited.
Vendors/Visitors should also notify the department, which they are visiting.

2) Visitors who are on an Annual Pass will be issued a proximity card that will allow them to enter and exit through the mill entrance turnstills. The ADT security system automatically logs their entry and exit times. Annual Pass holders are not required to sign in or out with Security.

3) In the event of a Level I incident, the IC (through the Department Supervisor/Team Leader and/or Evacuation Monitor) will notify the vendors working in the department of the need to evacuate the area and which evacuation route to use.

4) In the event of an emergency evacuation (Level II), the IC (through the Department Supervisor/Team Leader and/or Evacuation Monitor) will notify vendors/visitors working in the department of the need to evacuate to a specified Assembly Point, using a specified evacuation route. EMS/Security will perform a count of evacuated vendors/visitors, based on information in the Visitors Register.

X. Crisis Communication Plan

Proper communication with outside parties, including news media, regulatory agencies, and the community is a critical component of emergency response planning. (Note: The Environmental Director has responsibility for making any required notifications or reports regarding chemical releases or spills.) Bowater has developed and implemented a detailed “Crisis Communication Plan” (see Appendix B), which addresses procedures to be followed in event of a major emergency. Applicable portions of this plan are attached for reference purposes. This plan should be reviewed by the Emergency Operations Team and activated as required.

XI. Training Requirements and Procedures

It is recognized that at the time an emergency occurs, there will not be enough time to look up and consult every part of this Plan. It is intended therefore, that every affected employee be familiar with their duties and responsibilities before hand. This Emergency Response Plan will be reviewed with every employee on site, Contractor Supervisor and Vendor Representative during safety orientations, and annually during a monthly safety meeting.

Each major department should also be familiar with their departmental emergency response plan and process shut down procedures.
Familiarization shall be the responsibility of the department managers. Any portion of either manual should be the subject of discussions at regularly scheduled safety meetings; should be reviewed when the department head decides it would be helpful; and may be the subject of “pop questions” type check-ups to determine their ability to understand this Emergency Plan.

*Each department is required to review the Mill Wide Emergency Response Plan and their own Departmental Emergency Response Plan:*

- *Initially when this Plan is released for implementation;*
- *Whenever an employee’s responsibilities under the Plan change; and,*
- *Whenever the plan is changed.*

*The Health & Safety Manager is to be notified in writing that these reviews have been completed.*

A review of the Mill Wide Emergency Response Plan and Departmental Emergency Plan is a part of the orientation program for every new employee.

The details of the Mill Emergency Response Plan will be provided to each Contractor who has personnel on the Mill site. It is the responsibility of each Contractor to communicate the ERP requirements and procedures to their employees and to provide any needed additional training for their personnel. The Contractor shall provide documentation of initial and annual ERP training for their employees to the Safety Department.

The Mill Emergency Response Team (MERT) members are required to undergo training. The types, levels and frequency of the training will vary depending on the assignment of each member of the MERT. The training requirements for the Fire Brigade are annual. The Confined Space Rescue and HAZMAT Teams train annually and quarterly. The training requirements for members of the Hazmat Team are included in Appendix I. Members must demonstrate competency in their assigned role and continual review and practice is necessary.

**XII. Emergency Response Drills**

The Mill Emergency Response Team will be provided an opportunity at periodic intervals (at least annually) to assemble as a group and practice their skills. This will serve as in-house refresher training and will also permit the inventory and condition of the response equipment including personal protective equipment.
A Mill-Wide evacuation drill should be conducted at least every three years, if not more often. Such drills can be scheduled at times when Mill operations will not be compromised. In addition, each department will schedule a department level practice and simulation drill on an annual basis.

Observers will be designated to evaluate the effectiveness of the drills, take notes on potential problem areas and report to department supervisors and the EOT on the results of the drill activity. The Emergency Operations Team will review such activities and make any needed changes to these procedures.

**XIII. Incident Investigation Procedures**

Within 48 hours of any incident requiring activation of the Emergency Response Plan or the Crisis Communication Plan, the Vice President and Resident Manager or his designee will meet with all personnel involved in the mitigation and control of the incident. This debriefing will:

1. Identify any preliminary corrective actions in systems, operations, policies, or procedures to prevent recurrence or assist in recovery; the investigation will also include a critique of the emergency response actions.
2. Clearly identify those responsible for follow-up and implementation. This investigation team will include Mill Management; member of the Safety Department; affected Departmental Supervisors; the Incident Commander any Contractors/Vendors known to be involved in the incident; other persons as designated by the Mill IC who are knowledgeable of the process or incident.
3. Establish a time line for completion of the Investigation Report and follow-up on recommendations.

A report shall be prepared at the conclusion of the investigation that includes at a minimum:

(i) Date of incident;

(ii) Date investigation began;

(iii) A description of the incident;

(iv) The factors that contributed to the incident; and,
(v) Any recommendations resulting from the investigation.

The Mill Manager shall establish responsibility to promptly address and resolve the incident report findings and recommendations. Resolutions and corrective actions shall be documented by using the Accident/Incident Investigation database, which is located on the mill’s computer system. The report shall be reviewed with all affected personnel whose job tasks are relevant to the incident findings including contract employees where applicable. Incident investigation reports shall be retained for five years.
APPENDIX A - Key Personnel/Emergency Contact List
### Mill Wide
#### Emergency Response Plan

Revised May 2008

<table>
<thead>
<tr>
<th>Position</th>
<th>Name</th>
<th>Office</th>
<th>Home</th>
<th>Pager</th>
<th>Cellular</th>
</tr>
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<tbody>
<tr>
<td>V.P &amp; General Manager</td>
<td>Jack Carter</td>
<td>336-7200</td>
<td>N/A</td>
<td>883-1666</td>
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<tr>
<td>Maintenance Manager</td>
<td>Winton Westberry</td>
<td>336-7333</td>
<td>513-0096</td>
<td>650-8623</td>
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<tr>
<td>Production Manager-Paper</td>
<td>Bill Wilson</td>
<td>336-7594</td>
<td>476-3592</td>
<td>513-9688</td>
<td>315-4128</td>
</tr>
<tr>
<td>Utilities Manager</td>
<td>Keith Dennis</td>
<td>336-7580</td>
<td>513-0140</td>
<td>715-2964</td>
<td></td>
</tr>
<tr>
<td>Mfg. Services Manager</td>
<td>Bill Litzenberg</td>
<td>336-7524</td>
<td>238-1289</td>
<td>513-9696</td>
<td>715-3422</td>
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<tr>
<td>Health &amp; Safety Manager</td>
<td>Larry Vest</td>
<td>336-7217</td>
<td>478-1643</td>
<td>513-9697</td>
<td>413-8085</td>
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<tr>
<td>Safety Engineer</td>
<td>Lisa Martin</td>
<td>336-7639</td>
<td>221-0080</td>
<td>664-2768</td>
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</tr>
<tr>
<td>Pulping Operations Manager</td>
<td>Jeff Stevens</td>
<td>336-7774</td>
<td>513-0143</td>
<td>336-4466/803-370-3464</td>
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<tr>
<td>Environmental Director</td>
<td>Jack O'Grady</td>
<td>336-7591</td>
<td>559-2265</td>
<td>513-9600</td>
<td>785-7878</td>
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<tr>
<td>Technical Manager</td>
<td>John Griffey</td>
<td>336-7559</td>
<td>476-2169</td>
<td>513-9695</td>
<td>240-8330</td>
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<tr>
<td>HRD Director</td>
<td>Jim Brigham</td>
<td>336-7727</td>
<td>479-5301</td>
<td>513-9602</td>
<td>715-4952</td>
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## Mill Wide Emergency Response Plan

### Liaison Contacts

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<tr>
<th>Position</th>
<th>Name</th>
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<th>Home</th>
<th>Pager</th>
<th>Cell</th>
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<tr>
<td>Environmental Director</td>
<td>Jack O’Grady</td>
<td>336-7591</td>
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<td>785-7878</td>
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<tr>
<td>Radiation Safety Officer</td>
<td>Larry Vest</td>
<td>336-7217</td>
<td>478-1643</td>
<td>513-9697</td>
<td>413-8058</td>
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<tr>
<td>Public Information Officer</td>
<td>Jim Brigham</td>
<td>336-7727</td>
<td>728-3698</td>
<td>513-9602</td>
<td>618-8097</td>
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<td></td>
<td>Bill Litzenberg</td>
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<td>513-9696</td>
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<td>336-7591</td>
<td>559-2265</td>
<td>513-9600</td>
<td>785-7878</td>
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### Direct Inward/Outward Telephones

(For use during complete mill phone outage)

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<tr>
<td>Powerhouse Turbine Operator</td>
<td>336-3465</td>
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<tr>
<td>Main Guard Office &amp; Gate #4</td>
<td>336-2160</td>
</tr>
<tr>
<td></td>
<td>336-9865</td>
</tr>
<tr>
<td>Powerhouse control room 3rd Floor</td>
<td>336-8258</td>
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### Community Emergency Contact List

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<thead>
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<th>Contact Name/Organization</th>
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<tr>
<td>McMinn County</td>
<td></td>
</tr>
<tr>
<td>McMinn County EOC</td>
<td>745-3140 or 744-2724</td>
</tr>
<tr>
<td>McMinn County Sheriff Office</td>
<td>745-3140</td>
</tr>
<tr>
<td>Calhoun Fire Department</td>
<td>745-4444 (911)</td>
</tr>
<tr>
<td>Calhoun Police Department</td>
<td>745-4444 (911)</td>
</tr>
<tr>
<td>Calhoun Elementary School</td>
<td>336-2974</td>
</tr>
<tr>
<td>Athens Regional Hospital</td>
<td>744-3227</td>
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<tr>
<td>Woods Memorial Hospital</td>
<td>263-3625</td>
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<tr>
<td>Advent Home</td>
<td>336-5052</td>
</tr>
<tr>
<td>Bradley County</td>
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<tr>
<td>Bradley County Emergency Mgmt. Agency</td>
<td>476-0606</td>
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<tr>
<td>Bradley County Sheriff’s Office</td>
<td>476-0680</td>
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<tr>
<td>Bradley Memorial Hospital</td>
<td>559-6183</td>
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<tr>
<td>Charleston Police Department</td>
<td>476-0492</td>
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<td>Charleston Fire Department</td>
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<tr>
<td>Charleston Schools</td>
<td>336-2232</td>
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<td>RACES Pager – Randall Walsh</td>
<td>550-2079</td>
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<tr>
<td>Cleveland Community Hospital</td>
<td>339-4131</td>
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<tr>
<td>Cleveland Fire Department</td>
<td>472-2182</td>
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<td><strong>Other</strong></td>
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<td>Tennessee Highway Patrol</td>
<td>634-6890</td>
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<tr>
<td>National Response Center (Chemical/Oil Spills)</td>
<td>1-800-424-8802</td>
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<td>Olin Chemicals (Guard Office)</td>
<td>336-4220</td>
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<tr>
<td>Tennessee Emergency Management Agency</td>
<td>1-800-262-3300</td>
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<td>State Weather Service (Morristown)</td>
<td>423-586-8706</td>
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<tr>
<td>B &amp; B Marina</td>
<td>336-2341</td>
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<tr>
<td>Duke Energy – Natural Gas Line</td>
<td>888-231-2294</td>
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Motorola Radio Channels

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<td>CSQ</td>
<td>CSQ</td>
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<td>Charleston PD</td>
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<td>CSQ</td>
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<td>McMinn Cty Sheriff</td>
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<td>12</td>
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<td>16</td>
<td>Athens FD</td>
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SPILL/RELEASE

REPORTING PLAN

Revision: 08/16/01
SPILL/RELEASE REPORTING PLAN

The purpose of the spill/release reporting plan is to provide guidance as to what, when, and to whom Spill/Releases must be reported.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) requires that releases be reported to the National Response Center (NRC) as soon as the person in charge of a facility has knowledge that a release in excess of the reportable quantity has occurred in a 24-hour period (This does not mean you have 24-hours to report it). The Superfund Amendments and Reauthorization Act (SARA) requires immediate reporting of off-site releases of hazardous substances. The Environmental Protection Agency feels immediate is five minutes or less.

For reporting purposes, the environment is any water, air, or land surface and would include such things as spills to rivers, underground pipe breaks, gas releases, and etc.

This is intended to provide immediate guidance for those materials most likely requiring reporting if released. All chemicals on-site are undergoing review for hazardous constituents and additional substances will be added as identified.
Release Reporting

Report Release to EMS/Security 7911

Offsite Consequences

Is a Community Evacuation Necessary (significant gas release)

Contact Local Emergency Agencies

Call Environmental Person On-call

Call Environmental Person On-call
TO WHOM TO REPORT

Person or Designee Identifying Release:

Call the EMS/Security at 7230 and provide information immediately available. State if there have been any injuries or if there is a need to evacuate either the mill or the community. Take appropriate actions to minimize and contain release.

EMS/Security Technician:

Step 1 Make initial determination if any immediate precautions (i.e. evacuation) are necessary.

Step 2 If it appears that a release warrants community evacuation (i.e. significant gas release) immediately notify:

- Athens Communications Center (LEPC) 745-3140
- Bradley County Sheriff’s Dept. 476-0680
- Bradley County Emer. Mgmt. Agency 476-0680
- Cleveland Fire Department (if needed) 472-2181
- Charleston Fire Department 476-0492
- Calhoun Fire Department 745-4444

Be prepared to provide information on the Chemical(s) involved, i.e. chlorine and what action is immediately needed.

Step 3 If Step 2 is not necessary, or after completing Step 2 requirements, call the Environmental person on-call or any of the following:

<table>
<thead>
<tr>
<th>Name</th>
<th>Ext.</th>
<th>Home</th>
<th>Pager</th>
</tr>
</thead>
<tbody>
<tr>
<td>J. W. O’Grady</td>
<td>7591</td>
<td>559-2265</td>
<td>513-3900</td>
</tr>
<tr>
<td>Kevin Davenport</td>
<td>7557</td>
<td>421-3081 (cell)</td>
<td>513-0032</td>
</tr>
</tbody>
</table>
After contacting Environmental, call the Emergency Key Personnel list and refer to Emergency Procedures Manual. If unable to contact any of the above, contact the Emergency Centers listed below as required.

Determine if substance released requires notification under CERCLA of SARA (See attached reporting requirements). If so, the following Emergency Centers will be notified as appropriate:

Athens Communication Center 745-3140 (off-site release only)
TEMA 1-800-262-3300
National Response Center 1-800-424-8802

XIV. REPORTING REQUIREMENTS

CERCLA (Comprehensive Environmental Responsibility, Compensation with Liability Act) Hazardous Substances and SARA (Superfund Amendments and Reauthorization Act) Extremely Hazardous Substances are identified on the attached. Regulatory Reporting Requirements are:

Hazardous substances spilled in excess of the RQ (Reportable Quantity) to the environment and stay on-site require notification to TEMA and NRC. A courtesy call to the Athens Communications Center may be warranted if the release is significant.

Hazardous substance releases that exceed RQ and go off-site must be reported to Athens Communication Center, TEMA, and NRC. Others as appropriate if outside assistance is needed.

Discharges of oil to the Hiwassee River that cause a film or sheen or discoloration of the surface must be reported to the NRC.

The above are required contacts. Additional informational calls will be made to state agencies/departments as deemed appropriate by the Environmental Group.
What to Report to the Agencies

1. Hazardous substance and RQ in pounds;
2. Estimated release in pounds;
3. Time and duration of release;
4. Where material was released to (i.e. air, ground, Hiwassee River);
5. Any known or anticipated health risks associated with the emergency and where appropriate advice regarding medical attention necessary for exposure to individuals (See MSDS sheet);
6. Any precautions that have or need to be taken (i.e., evacuation); and
7. Name and telephone number of persons to be contacted.

Indicate if any assistance is or is not required (i.e. blocking highways, ambulances, fire trucks, emergency response teams). The person you talk to will probably not be able to accurately assess and respond to the release without your personal input.
## Reportable Chemicals

<table>
<thead>
<tr>
<th>Chemical</th>
<th>CERCLA Hazardous Substance</th>
<th>Reportable Quantity RQ</th>
<th>Approximate Volume Containing RQ 100% Basis</th>
</tr>
</thead>
<tbody>
<tr>
<td>Weak Black Liquor</td>
<td>Sodium Hydroxide (1%)</td>
<td>1,000 lbs.</td>
<td>11,990 gallons</td>
</tr>
<tr>
<td>Heavy Black Liquor</td>
<td>Sodium Hydroxide (3%)</td>
<td>1,000 lbs.</td>
<td>3,800 gallons</td>
</tr>
<tr>
<td>White Liquor</td>
<td>Sodium Hydroxide (12%)</td>
<td>1,000 lbs.</td>
<td>1,111 gallons</td>
</tr>
<tr>
<td>Green Liquor</td>
<td>Sodium Hydroxide (3%)</td>
<td>1,000 lbs.</td>
<td>6,667 gallons</td>
</tr>
<tr>
<td>Hydrochloric Acid</td>
<td>Hydrochloric Acid (40%)</td>
<td>5,000 lbs.</td>
<td>1,260 gallons</td>
</tr>
<tr>
<td>Aluminum Sulfate</td>
<td>Aluminum Sulfate (28%)</td>
<td>5,000 lbs.</td>
<td>1,585 gallons</td>
</tr>
<tr>
<td>Sodium Bisulfite</td>
<td>Sodium Bisulfite (44%)</td>
<td>5,000 lbs.</td>
<td>987 gallons</td>
</tr>
<tr>
<td>Methanol</td>
<td>Methanol (100%)</td>
<td>5,000 lbs.</td>
<td>757 gallons</td>
</tr>
<tr>
<td>Phosphoric Acid</td>
<td>Phosphoric Acid (75%)</td>
<td>5,000 lbs.</td>
<td>352 gallons</td>
</tr>
<tr>
<td>Sodium Hydroxide</td>
<td>Sodium Hydroxide (20-30%)</td>
<td>1,000 lbs.</td>
<td>308 gallons</td>
</tr>
<tr>
<td>Aqua Ammonia</td>
<td>Ammonium Hydroxides</td>
<td>1,000 lbs.</td>
<td>133 gallons</td>
</tr>
<tr>
<td>Sulfuric Acid</td>
<td>Sulfuric Acid (100%)</td>
<td>1,000 lbs.</td>
<td>65 gallons</td>
</tr>
<tr>
<td>Sodium Hypochlorite</td>
<td>Sodium Hypochlorite (15%)</td>
<td>100 lbs.</td>
<td>63 gallons</td>
</tr>
<tr>
<td>Chlorine</td>
<td>Chlorine</td>
<td>10 lbs.</td>
<td>N/A (Gas)</td>
</tr>
<tr>
<td>Hydrogen Sulfide</td>
<td>Hydrogen Sulfide</td>
<td>100 lbs.</td>
<td>N/A (Gas)</td>
</tr>
</tbody>
</table>
APPENDIX C - Fire Control Procedures
XVI. MILL FIRE BRIGADE

All Mill Emergency Response Team members will be trained to the Structural Fire Brigade level. Fire Brigade members will receive training at least quarterly, and they must be in good health and physically capable of performing the duties assigned.

The local Calhoun and Charleston city fire departments will provide backup assistance to the Mill Fire Brigade when needed.

**Structural Fire Brigade Functions** -

- Use of fire suppression system to control fire, including fire extinguishers, fire hoses, foam, and the fire truck.
- Rescue personnel from threatening fire occurrences.
- Search for individuals who cannot be accounted for.
- Assess the fire situation and decide on a course of action.
- Prevent and minimize damage to buildings and contents from fires and fire control activities.
- Follow the incident management system during a fire.
- Other functions, as needed, provided such functions are within the scope of fire brigade training.

**Incipient Fire Brigade**

Members will consist of operating personnel. Duties and responsibilities will be outlined below. Individuals will be trained annually.
Incipient Fire Brigade Function -

Call Structural Fire Brigade and use portable extinguishers, water hoses, and fire hoses up to 1 l/2” to extinguish initial fire. Individuals will evacuate area if fire cannot be extinguished.

Resource Personnel

Individuals will be assigned specific duties to assist during the fire. Resource Personnel will not be a part of the fire brigade and will not be expected to perform any of the duties outlined under the Structural Fire Brigade functions. Training will be provided as necessary to ensure individuals know their assigned duties.

- Resource Personnel - Mandatory
- EMS/Security – EMS site control and radio communication.
APPENDIX D - Storm Shelter Locations
1. Recycle Pulper Mix Pit
2. F/S B Mill Basement (Adjacent to New Elevator)
3. PM 1&2 Basement South End Beater
4. PM 3&4 Basement South End Beater
5. PM 5 Basement South End Beater
6. P&S Powerhouse - Unit & Recovery Control Rooms
7. Filter Plant Basement
8. Chip Prep Restroom SLL
9. Chip Prep Restroom NLL
10. Chip Prep Dock Turn Table – Electrical Control Room/Hardwood Reclaim Tunnel
11. Chip Prep South Pine Reclaim Tunnel
12. TMP Basement (NEW)
13. TMP Basement (OLD)
15. Admin. Bldg. - Center Restrooms/Woodlands Storage
16. Facilities Bldg. - Ladies Restroom/Foreman’s Locker Room/Health Services Storage Room/Safety Storage Room
17. Warehouse - Salvage Yard Building
18. Mill Services Bldg. - Stairwells
APPENDIX E - Terrorism/ Bomb Threat Procedures
EMERGENCY RESPONSE PLAN

BOMB THREAT

November 1989

Revised 2/16/01
Receipt of the Threat

Guidance to employees who receive telephone threats is provided in the Bomb Threat Information Sheet that appears at the end of these Procedures.

A bomb threat is rarely made in person and is sometimes transmitted in writing. A bomb threat made in writing should be handled carefully and touched by as few persons as possible and the envelope or any other accompanying materials should be retained and preserved. Observing these simple precautions can be extremely helpful to a post-incident investigation.

Initial Response

When the EMS/Security Office receives, or is informed of a bomb threat, the following initial actions will be:

♦ Notify the Emergency Response Team to establish Incident Command System.
♦ Notify the Emergency Operations Team or Mill Site Coordinator (after hours)
♦ Notify the EMS/Security Supervisor

Evaluation

Evaluation of a bomb threat will be made by the Emergency Response Team. Evaluation will be made on the basis of all facts available at the time. Many of the available facts will be obtained from the person who received the bomb threat. Evaluation is the process for judging the credibility of the threat. When a threat is judged to be false, the evaluators may elect to take no action. An example might be a bomb threat made by a child over the telephone. When a threat is judged to have possible credibility, the Incident Commander will make one of three following decisions:

♦ To search without evacuation.
♦ To evacuate, partially or fully, and then search.
♦ To evacuate and not search.

When a threat is judged to have no credibility at all, the decision will be to take no action.
Evacuation Options

If a credible bomb threat is received and if the decision is not to evacuate, the Incident Commander will notify EMS/Security to make a Gaitronics announcement to the effect that:

♦ A bomb threat has been received.
♦ There is no reason to believe that anyone is in danger.
♦ The decision has been made not to evacuate.
♦ Any person in the building who wishes to leave may do so.

If the decision is to evacuate, the announcement will include brief instructions to employees to:

♦ Take with them any personal belongings (particularly purses, briefcases, and packages).
♦ Make a quick visual surveillance of their immediate work areas for the purpose of detecting suspicious objects.
♦ Report their suspicions to EMS/Security personnel as they leave the facility.

The decision to evacuate will take into consideration the location of a suspect bomb. The evacuation announcement will direct evacuees away from the danger zone.

Total evacuation will not be an automatic response. Partial evacuation would be an appropriate response in those instances where the bomb threat caller mentions a specific location.

Communications

There have been very few recorded instances of explosive charges triggered by radio frequency energy. Generally, therefore, it is considered that use of hand-held radios to assist in search procedures is not a serious hazard. However, do not operate a hand-held radio beyond a radius of ten feet from the suspicious object. If in doubt, use the telephone as the primary means of communication.

Suspicious Object
If a suspicious object is found, the finder will call the EMS/Security Office without delay, ensuring first that the suspect device is not touched or moved by any other searcher or uninformed bystander. These actions will follow the discovery of a suspicious object:

♦ The EMS/Security Office will notify the Emergency Response Team to establish an Incident Command System, then notify the Emergency Operations Team and the EMS/Security Supervisor. The Emergency Operations Team will ask the Sheriff's Department to take command of the situation with respect to handling of the suspect bomb.
♦ Depending on the circumstances, a partial or full evacuation will be immediately implemented.
♦ The EMS/Security Office will ensure that the McMinn County EOC has been notified and that EMS and Health Services personnel are on stand-by.

The police may ask for help when a device is found. This help might be to:

**Coordination**

The EMS/Security Office will serve as the focal point of telephone communications during a bomb incident. At the earliest possible moment following the initiation of a bomb incident, the Emergency Operations Team and the EMS/Security Supervisor will proceed to the Emergency Operations Center to coordinate management of the incident with the Incident Commander.

If the EMS/Security Office and the Emergency Operations Center are within the danger zone posed by the bomb, all personnel in that area will evacuate to an alternate site. Before leaving the EMS/Security Office, the telephones will be placed on call forwarding to that location.

**Police Involvement**

The initial notice to the McMinn County EOC of a bomb incident will most likely result in a patrol unit being sent to the Emergency Operations Center. Depending on the nature of the threat, the police will decide what other notifications are appropriate with respect to the fire department and bomb disposal unit. The principal functions of the police will be to:

♦ Provide guidance to the Emergency Operations Team.
♦ Conduct certain limited searches of areas surrounding a suspect device.
Dispose of suspect devices.
Questions to ask person reporting the threat.

1. When is the bomb going to explode?
   _______________________________________________________

2. Where is it right now?
   _______________________________________________________
   _______________________________________________________

3. What does it look like?
   _______________________________________________________ 
   _______________________________________________________ 

4. What kind of bomb is it?

Exact wording of threat. (Record on paper as soon as possible.)

________________________________________________________________
________________________________________________________________
________________________________________________________________
________________________________________________________________

Characteristics of caller’s voice.

__ Calm     __ Crying     __ Deep
__ Angry    __ Normal   __ Ragged
__ Excited  __ Distinct __ Clearing throat
__ Slow     __ Slurred  __ Deep breathing
__ Rapid    __ Nasal    __ Cracking voice
__ Soft     __ Stutter  __ Disguised
__ Loud     __ Lisp     __ Accent
__ Laughter __ Raspy    __ Familiar

If the voice is familiar, who did it sound like?
AbitibiBowater, Calhoun Operations
Bomb Threat Information Sheet

Threat language.

__  Well spoken (educated)  __  Message read by the threat maker
__  Foul  __  Incoherent
__  Irrational  __  Taped
__  Other impressions ____________________________

Background sounds.

__  Office Machinery  __  PA System  __  Clear
__  Factory machinery  __  Music  __  Static
__  Street Noises  __  House  __  Local
__  Crockery  __  Motor  __  Long distance
__  Voices  __  Animal Noises  __  Other impressions

___________________________________________________________________________

___________________________________________________________________________

___________________________________________________________________________

___________________________________________________________________________

Your Name: ________________________________ Department ______________
Number of phone that call was received on: ________________________________
Date and time call was received: __________________________________________

After a threat is received, report the call immediately to the EMS/Security Office at 7230. Do not discuss this call with anyone other then your immediate supervisor and EMS/Security personnel.
EMERGENCY CONTACTS

APPENDIX G - Mill Evacuation Route Maps and Assembly Points
Mill Wide
Emergency Response Plan

BOWATER NEWSPRINT AND DIRECTORY DIVISION
Calhoun Operations
Evacuation Assembly Points

EVACUATION ASSEMBLY POINTS

1. EXIT THE CONTRACTOR OR MAIN GATE SOUTH ALONG U.S. HWY 11 ACROSS BRIDGE
2. RECREATION AREA PARKING LOT VIA THE RAILROAD TRACKS UNDER U.S. HWY 11 BRIDGE, OR VIA THE MAIN MILL ENTRANCE
3. EXIT NORTH GATE BEHIND THE KRAFT MILL & PROCEED TO EMPLOYEE CREDIT UNION AREA
4. WOOD TRUCK ROAD ENTRANCE VIA MILL ROAD LEADING TO THE COAL YARD
5. EXIT NORTH TOWARDS RECYCLE, CONTINUE ON ROAD TO GATE AT STATE HWY 163

March 2002
Mill Wide
Emergency Response Plan

To Assembly
Point C

Administration Building
Fire Evacuation Routes

* = Tornado Shelters

Assembly Point A

To Assembly Points A/B
Power Plant Evacuation Routes

Assembly Point B

Assembly Point C

Administration Building

Digester & Pulping Facility

Bleach Plant

Klin Feed House

Lime Klin

Klin Firing House

Entrance

Facilities Building

OFFICES

PLANT NORTH

POWER HOUSE

UNIT CONTROL ROOM

REC. CONTROL ROOM

RB1 BB1 BB2 RB2 PB1 PB2 PB3

Groundwood

Paper Mill

TMP Mill

PLANT NORTH

Assembly Point B

Klin Feed House

Lime Klin

Klin Firing House

Entrance

Facilities Building

OFFICES

PLANT NORTH

POWER HOUSE

UNIT CONTROL ROOM

REC. CONTROL ROOM

RB1 BB1 BB2 RB2 PB1 PB2 PB3

Groundwood

Paper Mill

TMP Mill
Kraft Mill Evacuation Routes

To Assembly Area C

Figure 6 - Kraft Mill Evacuation Routes
Chip Prep Emergency Evacuation Routes

Chip Prep Area Evacuation

To Assembly Point E

To Assembly Point D

To Assembly Point C

To Assembly Point A

To Assembly Points A/B
TMP Department Evacuation Routes

TMP Evacuation Routes

To Assembly Point A/B

To Assembly Point A

Office

Facilities Building

Administration Building

Old Groundwood Area

TMP Lines 1-6

#3 Recovery Boiler

Powerhouse

Machine Shop

Stock Preparation

Wet End

No. 1 Paper Machine

Dry End

Testing Station

Press/Wrap

Pulp Dryer

Wet End

Wet End

Wet End

Wet End

Wet End
Paper Mill Evacuation Routes

- To Assembly Points A/B/C
- To Assembly Points D/E
- F & S
- Old Groundwood Area
- TMP Lines 1-6

Diagram showing evacuation routes in a paper mill.
Recycle Emergency Evacuation Routes
APPENDIX H - Regulatory Cross Reference
# Mill-Wide Emergency Response Plan

## Regulatory Cross Reference

<table>
<thead>
<tr>
<th>Regulatory Reference</th>
<th>Description</th>
<th>Addressed in Emergency Response Plan Section:</th>
</tr>
</thead>
<tbody>
<tr>
<td>1910.120(q)(2)(i)</td>
<td>Pre-emergency planning and coordination with outside parties</td>
<td>Section IV, Types of Emergencies and Response Actions</td>
</tr>
<tr>
<td>1910.120(q)(2)(ii)</td>
<td>Personnel roles, lines of authority, training and communication</td>
<td>Section V, Mill Emergency Response Team; Section VI, Section XI, Training Requirements and Procedures</td>
</tr>
<tr>
<td>1910.120(q)(2)(iii)</td>
<td>Emergency recognition and prevention</td>
<td>Section IV, Types of Emergencies and Response Actions</td>
</tr>
<tr>
<td>1910.120(q)(2)(iv)</td>
<td>Safe distances and places of refuge</td>
<td>Section VII, General Evacuation Procedures; Department-Specific ERP's</td>
</tr>
<tr>
<td>1910.120(q)(2)(v)</td>
<td>Site security and control</td>
<td>Section III, Definitions; Section V, Mill Emergency Response Team Org.; Section VII, General Evacuation Procedures</td>
</tr>
<tr>
<td>1910.120(q)(2)(vi)</td>
<td>Evacuation routes and procedures</td>
<td>Section VII, General Evacuation Procedures</td>
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<tr>
<td>1910.120(q)(2)(vii)</td>
<td>Decontamination</td>
<td>Department-Specific ERP’s, for potential contaminants in their areas.</td>
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<tr>
<td>1910.120(q)(2)(viii)</td>
<td>Emergency medical treatment and first aid</td>
<td>Section VIII, Medical Support, First Aid</td>
</tr>
<tr>
<td>1910.120(q)(2)(ix)</td>
<td>Emergency alerting and response procedures</td>
<td>Section VII, General Evacuation Procedures</td>
</tr>
<tr>
<td>1910.120(q)(2)(x)</td>
<td>Critique of response and follow-up</td>
<td>Section XIII, Incident Investigation Procedures</td>
</tr>
<tr>
<td>1910.120(q)(2)(xi)</td>
<td>PPE and Emergency Equipment</td>
<td>Department-Specific ERP’s</td>
</tr>
<tr>
<td>1910.119(m)</td>
<td>Incident Investigation</td>
<td>Section XIII, Incident Investigation Procedures</td>
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### Regulatory Cross Reference

<table>
<thead>
<tr>
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<tr>
<td>1910.119(n)</td>
<td>Emergency planning and response</td>
<td>Plant and Department-Specific ERP’s as a whole</td>
</tr>
<tr>
<td>1910.38(a)(2)(i)</td>
<td>Emergency escape procedures and emergency escape route assignments</td>
<td>Section VII, General Evacuation Procedures, Department-Specific ERP’s</td>
</tr>
<tr>
<td>1910.38(a)(2)(ii)</td>
<td>Procedures to be followed by employees who remain to operate critical plant operations before they evacuate</td>
<td>Section VII, General Evacuation Procedures; Department-Specific ERP’s</td>
</tr>
<tr>
<td>1910.38(a)(2)(iii)</td>
<td>Procedures to account for all employees after emergency evacuation has been completed</td>
<td>Section III, Definitions; Section VII, General Evacuation Procedures</td>
</tr>
<tr>
<td>1910.38(a)(2)(iv)</td>
<td>Rescue and medical duties for those employees who are to perform them</td>
<td>Section III, Definitions (Confined Space Rescue Team); Section VIII, Medical Support/First Aid</td>
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<tr>
<td>1910.38(a)(2)(v)</td>
<td>Preferred means of reporting fires and other emergencies</td>
<td>Section IV, Types of Emergencies and Response Actions; Section VI, Emergency Alarm / Notification</td>
</tr>
<tr>
<td>1910.38(a)(2)(vi)</td>
<td>Names or regular job titles of person or departments who can be contracted for further information or explanation of duties under the plan</td>
<td>Section I, Introduction</td>
</tr>
<tr>
<td>1910.38(a)(3)</td>
<td>Alarm system</td>
<td>Section VI, Emergency Alarm/Notification</td>
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<tr>
<td>1910.38(a)(4)</td>
<td>Evacuation</td>
<td>Section VII, General Evacuation Procedures</td>
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<tr>
<td>1910.38(a)(5)</td>
<td>Training</td>
<td>Section XI, Training Requirements and Procedures</td>
</tr>
<tr>
<td>1910.165</td>
<td>Employee alarm systems</td>
<td>Section VI, Emergency Alarm / Notification</td>
</tr>
</tbody>
</table>
APPENDIX I - Hazmat Team Training Requirements
HazMat Team Training Requirements

The procedure for this type of training will be some classroom followed by extensive hands-on training using all available equipment. This approach will allow the responder to become competent in the use of personal protective equipment as well as fire fighting, rescue and spill response equipment. Each team member will be required to take a written examination at the end of formalized training to validate their knowledge and understanding of the information presented and practiced. The amount of training as required by the existing OSHA regulations consist of the following:

- **Hazardous Materials Technician**

All Mill Emergency Response Team members will trained to the Hazardous Material Technician level.

Hazardous materials technicians are individuals who respond to releases or potential releases for the purpose of stopping the release. They assume a more aggressive role than a first responder at the operations level in that they will approach the point of release in order to plug, patch or otherwise stop the release of a hazardous substance. Hazardous materials technicians shall have received at least 24 hours of training equal to the first responder operations level and in addition have competency in the following areas:

- Know how to implement the employer's emergency response plan.
- Know the classification, identification and verification of known and unknown materials by using field survey instruments and equipment.
- Be able to function within an assigned role in the Incident Command System.
- Know how to select and use proper specialized chemical personal protective equipment provided to the hazardous materials technician.
- Understand hazard and risk assessment techniques.
- Be able to perform advance control, containment, and/or confinement operations within the capabilities of the resources and personal protective equipment available with the unit.
• Understand and implement decontamination procedures.
• Understand termination procedures.
• Understand basic chemical and toxicological terminology and behavior.

• **Incident Commander**

Incident commanders, who will assume control of the incident scene beyond the first responder awareness level, shall receive at least 24 hours of training equal to the first responder operations level and in addition have competency in the following areas:
• Know and be able to implement the employer's incident command system.
• Know how to implement the employer's emergency response plan.
• Know and understand the hazards and risks associated with employees working in chemical protective clothing.
• Know how to implement the local emergency response plan.
• Know of the state emergency response plan and of the Federal Regional Response Team.
• Know and understand the importance of decontamination procedures.
Mill-Wide Emergency Response Plan

July 1, 2003
March 1, 2008

Approval:

Walter Brunson
V.P. Oper. & Res. Mgr.

Larry Vest
Safety & Health Services Mgr.