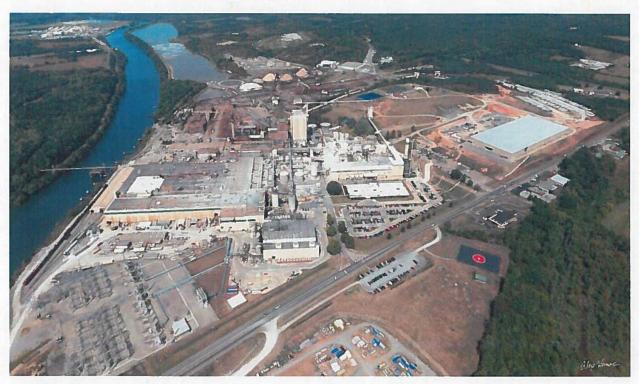


Calhoun Operations Millwide

Emergency Response Plan



To Report Any Emergency Dial 7911

Effective: September 12, 2018



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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 Resolute Forest Products-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 Local Emergency Planning Committee (LEPC). This committee meets on a routine basis and is comprised of representatives from local industries, McMinn and Bradley County Emergency Management Agencies, and the cities of Calhoun and Charleston. The LEPC'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 Millwide 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 Machine/ Finishing & Shipping (PM/F&S)
- Tissue Machine
- Chip Prep
- Tissue
- Conversion

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

This plan will be formally reviewed and updated at least annually. Updated copies of the Millwide 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 Health and Safety Manager, Department Managers or members of the Emergency Response Team.

II. 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.
- 40 CFR 68 EPA requirements covering accidental release management

A reference table has been developed 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.
- 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 Emergency Response 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 experienced 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 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:

- General Manager
- Maintenance Manager
- Production Manager-Paper
- Utilities Manager
- Health & Safety Manager
- Production Manager-Pulp
- Technical Manager
- Human Resources Manager
- Environmental Manager

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 Pulping Area Shift Supervisor 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. Emergency Operations Center (EOC)

The Labor Relations 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.

G. Mill Evacuation (ME)

In 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.

H. 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.

I. Shelter in Place (SIP)

A type of emergency response whereby a particular location is not evacuated but the occupants are instructed to remain inside or to go to a specific location within the facility. Such emergencies may include but are not limited to chemical or weather related occurrences. This is a precaution aimed to keep you safe while remaining indoors. A Shelter In Place for chemical exposure emergencies will be referred to as a Safe Haven and a weather related shelter in place will be referred to as a Tornado Shelter.

J. EMS/Security (EMS) and Health Services (HS)

EMS/Security is the mill Security Group comprised of security personal who have Emergency Medical Technician (AEMT or EMT-P) licensure and have also been trained in Confined Space Rescue, HAZMAT and Fire. Health Services is the mill health care provider group comprised of an RN, a PA and a part-time physician.

K. 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 annually by their respective departments.

L. 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.

M. "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

Resolute Forest Products-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
- Foul Condensate



- 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 other industries 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 Resolute Forest Products.

3. Fire/Explosion

Fire in a paper mill is a constant threat and is controlled by a formal Emergency Response Team. 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, the ERT Team has 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 VII of this plan. EMS/Security and Health Services are



trained to provide emergency medical 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 via National Weather Service alerts. 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), Gaitronics Alarm System 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 Shelter in Place in a designated Tornado shelter

Tornado 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 decision to evacuate will take into consideration the location of the suspect bomb. 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. Call Security, advise them of situation and have them call the Radiation Safety Officer.
- 3. Rope off area in all directions with red Danger tape or Radiation tape at a distance of no less than 100 feet in all directions.
- Keep the "rope-off" area clear of personnel until the source has been checked and secured by the Radiation Safety Officer (see Appendix A) or designated representative.

9. Active Shooter Events

Active shooter incidents are primarily law enforcement events and the McMinn County Sheriff's Department should be immediately notified if an incident occurs. Law enforcement will be sending officers into the impacted area to actively engage the threat and secure the perimeter. Each of these activities will require coordination with EMS/Security personnel. These situations are unpredictable and evolve quickly. Visitors and vendors will follow the lead of employees and managers during these events. If there is an accessible escape path, attempt to evacuate the premises. If evacuation is not possible, find a place to hide where the active shooter is less likely to find you. As a last resort, and only if there is an imminent danger to life, attempt to disrupt and/or incapacitate the active shooter.



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 reference 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)

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

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

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

A. 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)

- 1. There are two types of Emergency Evacuation: 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 Level I and Level II Emergency Section for Mill-wide chemicals. Each Department-Specific Emergency Response Plan contains any extra details that are particular for that department. 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 current Emergency Response Guidebook, U.S. Department of Transportation. (based on Chlorine @ 900 ft.)
- 2. If atmospheric contamination are a high enough levels that evacuating would pose an additional hazard or if there is not sufficient time for an evacuation, a Safe Haven Shelter In Place maybe determined to be the most effective means to address a chemical vapor or smoke cloud/air contaminate. You will be notified via the Gai-Tronics public announcement system, the mill channel radio, e-mail, text, or other means. This will be the same procedure regardless if the threat is an onsite or an offsite emergency. Immediately and safely proceed to the nearest safe haven location and remain there until the all clear is sounded or you receive confirmation the ambient atmosphere is safe for you to reenter. Area and departmental Safe Havens are identified in Appendix E to this plan and the area specific ERPs. Safe Haven Shelter In Places have been designated and visibly marked throughout the mill.

ALARMS AND MONITORS:

Stationary monitors are located in several areas of the Chem Prep, Kraft Mill Bleach Plant, Pulp Dryer, Paper Machine hardwood HCR (located in old Groundwood area), PM5 Low Consistency Refiner (located in TMP), Utilities, 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.

| Area | Chemical Monitored | STEL (ACGIH) | IDLH (NIOSH) |
|--|---|-----------------|-----------------|
| Chem Prep Kraft Mill Pulp Dryer | Chlorine dioxide (CIO ₂) | 0.3 ppm | 5.0 ppm |
| Filter Plant | Chlorine (Cl ₂) | 1.0 ppm | 10 ppm |
| Utilities Evaporators Waste Lift Dewater Plant | Hydrogen sulfide (H ₂ S) | 15 ppm | 100 ppm |
| Pulp Dryer PM 3 & 4 HCR PM 5 LCR | Sulfur dioxide (SO ₂) | 5 ppm | 100 ppm |

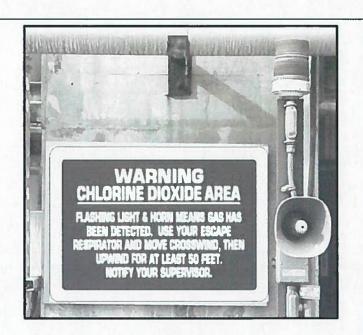


STATIONARY MONITOR FOR CHLORINE DIOXIDE RELEASES

Flashing light & Horn--0.3 ppm

If alarm activates, leave the area immediately.

Do not reenter the area until the concentrations and emergency levels (nonemergency, Level 1 or 2) have been determined to be at a safe level.



Stationary Alarms

EMERGENCY AWARENESS ACTIONS:

If any stationary monitor alarms (beacon light and horn), or if you see or smell any hazardous gasses 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.

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



V. 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

| Emergency Type | Mill Whistle Code |
|-----------------------------------|--|
| Mill-Wide Emergency Evacuation | One short blast, repeated intermittently for three minutes |
| Fire | Two short blasts, repeated intermittently for one minute |
| Other Emergency | Three short blasts, repeated intermittently for one minute |
| All clear | One long blast for 30 seconds. |

All personnel, upon hearing the Mill Whistle alarm, are to contact department supervision or monitor Mill Radio on Channel 3 for further details.



2. Gaitronics

Gaitronics 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 all radio channels. Mill Fire Brigade members will respond to the area with appropriate firefighting equipment.

After initial notification, channel 3 is 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.) All non-emergency communication is restricted until the Incident Commander declares the All Clear and opens the channel to normal radio traffic.

4. EMAIL

The fourth means of notification is the email system. Members of the Emergency Response Team (ERT) can be activated using the sca.dl.ERT distribution list on the mill's Lotus Notes software.



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.

VI. Mill Evacuation and Shelter in Place 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 Level I and Level II Emergency Section for Millwide chemicals. Each Department-Specific Emergency Response Plan contains any extra details that are particular for that department. 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. Millwide Level II emergencies will require the initiation of a Millwide 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, Shelter in Place, 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. 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.

3. 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 Gaitronics Alarm System.

Broadcast the status of the emergency and any evacuation information over all 16 Mill Radio channels.

Broadcast the Emergency Evacuation information by using the Mill Wide page on Gaitronics Alarm System.

Activate the ERT using the sca.dl.ERT distribution list in the email system.

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

- Charleston side of the Hiwassee River bridge (HWY 11)
- Both intersections of HW 163 and HWY 11
- HWY 163 and County Road 35

4. Emergency Operations Team

Contact local community leaders as outlined in the Local Emergency Planning Committee Manual which provides emergency logistics and planning support to the IC.



5. 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.

6. 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 3. 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.

NOTE: Most mill exit points have an Emergency Gate that can be broken open in the event of an evacuation.

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.

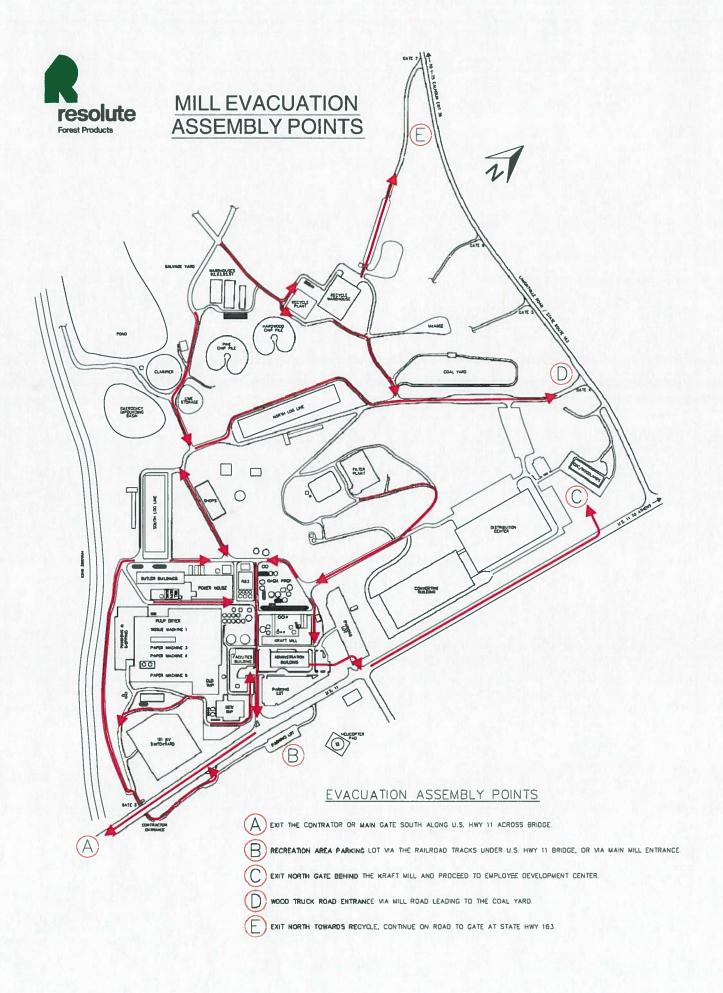
ASSEMBLY POINT C. Exit North Gate behind the Kraft Mill, go through parking lot and proceed north along Hwy 11 to the Employee Development Center area.

ASSEMBLY POINT D. Wood Truck Road entrance.

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



In the event of a bomb threat that requires Millwide evacuation, the assembly points listed will NOT be used. All employees, contractors and visitors will be told their assembly point upon exiting the mill site by either EMS/Security or the ERT member assisting with the evacuation. All cell phones must be turned off.





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/Lonza or Wacker 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.



 The Environmental Department should be notified by EMS/Security with details as soon as possible to ensure appropriate notifications to State environmental agencies (i.e. TDEC, etc.) are made in a timely manner as required by permit or law.

E. Shelter in Place

Upon receiving notification of a chemical vapor or smoke cloud/air contaminate that requires a Shelter In Place, all personnel including contractors and visitors should quickly and safely enter the nearest safe Haven and remain there until the all clear is communicated.

Safe Haven Shelter In Place Locations are identified in Appendix E of this Emergency Response Plan and within each departmental specific Emergency Response Plan

VII. Medical Support/ First Aid

Emergency medical support is provided by Resolute EMS/Security/Health Services. Notification to EMS is made by dialing "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. If neither is available, a Paramedic will provide appropriate treatment.
- 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.

Outside medical support is coordinated by EMS/ Security/Health Services, including air transport. Helicopter transport is available from LifeForce in Chattanooga and LifeStar in Knoxville. The landing zone for such transport



has been designated across Highway 11 (see photo below) with GPS coordinates N35.17.750; W084.45.162; elevation – 728 MSL and the common traffic advisory frequency is State EMS (155.205 mH).



VIII. 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:

- 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 Channels 1, 2, and 3 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 Gaitronics 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:



- 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 and on site at least every two weeks will be issued a proximity card that will allow them to enter and exit through the mill entrance turnstiles. 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.

IX. 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 beforehand. This Emergency Response Plan will be reviewed with every employee on site, Contractor Supervisor and Vendor Representative during safety orientations, annually during a monthly safety meetings, and through a Computer Based Training module completed annually.

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 Emergency Response Team (ERT) 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 ERT. The training requirements for the Fire Brigade are annual. The ERT trains quarterly and annually. 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.



X. Emergency Response Drills

The 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 millwide evacuation or Shelter in Place drill should be conducted at least annually. Such drills can be scheduled at times when Mill operations will not be compromised.

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.

XI. Incident Investigation Procedures

Within 48 hours of any incident requiring activation of the Emergency Response Team, the General Manager or his designee will meet with all personnel involved in the mitigation and control of the incident. This debriefing will:

- 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 followup 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 General 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



Revised September 2018

| Position | Office |
|--|----------|
| General Manager | 336-7200 |
| Production Manager Paper | 336-7790 |
| Utilities Manager | 336-7792 |
| Production Manager Pulp | |
| Health & Safety Manager, Radiation Safety Officer | 336-7217 |
| Safety Engineer Alternate Radiation Safety Officer | 336-7891 |
| Environmental Manager | 336-7591 |
| Technical Manager | 336-7419 |
| HR Manager | 336-7132 |



Liaison Contacts

| Position | Name | Office | Cell |
|-------------------------------|---------------|----------|--------------|
| Environmental Manager | Mike Yoder | 336-7591 | 432-0504 |
| Radiation Safety Officer | Keith Cathey | 336-7217 | 580-919-5656 |
| Public Information Officer | Lynne Willett | 336-7132 | 423-356-4965 |

Direct Inward/Outward Telephones (May be used during complete mill phone outage)

| Location | Number |
|---|----------------------|
| Powerhouse Turbine Operator | 336-3465 |
| Main Guard Office & Gate #7 | 336-9947 336-9865 |
| Recovery Control Room (3 rd Floor) | 336-8258 |

Community Emergency Contact List

| Contact Name/Organization | Telephone |
|--|----------------------|
| McMinn County | |
| McMinn County EOC | 745-3140 or 744-2724 |
| McMinn County Sheriff Office | 745-3140 |
| Calhoun Fire Department | 745-4444 (911) |
| Calhoun Police Department | 745-4444 (911) |
| Calhoun Elementary School | 336-2974 |
| Starr Regional Medical Center - Athens | 744-3227 |
| Starr Regional Medical Center - Etowah | 263-3625 |
| Advent Home | 336-5052 |
| Bradley County | |
| Bradley County Emergency Mgmt. Agency | 476-0606 |
| Bradley County Sheriff's Office | 476-0680 |
| Tennova Medical Center - Cleveland | 559-6183 |
| Charleston Police Department | 476-0492 |
| Charleston Fire Department | 476-0492 |



| Charleston Elementary School | 336 - 2232 |
|--|--------------|
| Cleveland Fire Department | 472 - 2182 |
| Other Numbers | |
| Life Force | 423-778-5433 |
| Tennessee Highway Patrol | 634 - 6890 |
| National Response Center - Chemical / Oil Spills | 800-424-8802 |
| Olin Chemicals - Security | 336 - 4220 |
| Tennessee Emergency Management Agency | 800-262-3300 |
| National Weather Service (Morristown) | 423-586-8706 |
| B & B Marina | 336 - 2341 |
| Duke Energy - Natural Gas Line | 888-231-2294 |
| Waker Polysilicon - Security | 780-7950 |



Appendix B - Spill/Release Reporting Plan



ENVIRONMENTAL CONTACT INFORMATION

Environmental Emergencies – ext. 7911
Environmental Department – Kim Bohannon - ext. 7606
Environmental Manager – Mike Yoder - ext. 7591
Environmental Coordinators - Seth Cook ext. 7197

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) require immediate reporting of off-site releases of hazardous substances. The Environmental Protection Agency feels immediate is five minutes or less.

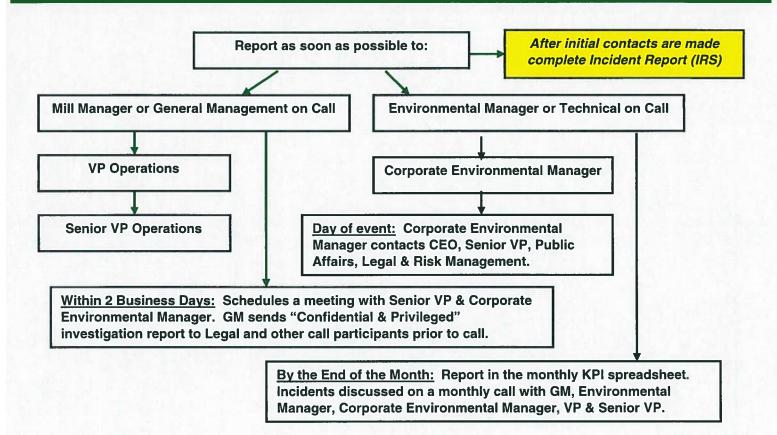
Resolute- Calhoun Operations is required to have spill plans in place. The plant has two separate plans that are in use and should be referred to also for additional information. These plans are the 1) SPCC Plan (Spill Prevention, Containment and Countermeasure Plan), which directs handling of oil and petroleum based chemicals; and 2) SWPP Plan (Storm Water Pollution Prevention), which directs handling of all chemicals and prevention of unauthorized materials discharged into storm water drainage systems.

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.......

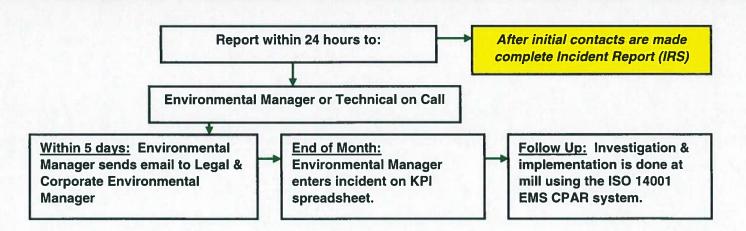
This is intended to provide immediate guidance for those materials most likely requiring reporting if released. Below is a decision tree for communication of incidents.



CLASS 1 & 2 INCIDENT REPORTING



CLASS 3 INCIDENT REPORTING





ENVIRONMENTAL INCIDENT CLASSIFICATIONS

CLASS 1 Incidents – High Severity

Includes environmental incidents and other environmental issues that present the risk of causing a significant adverse impact on the environment, public health and safety or that present a significant risk of resulting in:

- a lawsuit or claim (including charges and fines);
- damage to the Company's reputation;
- significant contamination and/or an environmental liability;
- significant short term or mid-term financial investment.

Class 1 incidents are determined by corporate environment and legal departments.

CLASS 2 Incidents – Moderate Severity examples:

| Incident Description | Quantity | Condition |
|--|---|--|
| Release of Ozone Depleting Substance (ODS) | ≥ 55 lbs | Inside/Outside Building |
| Release of Gas (except O ₂ , CO ₂ and N) | ≥ 110 lbs | Inside/Outside Building |
| Petroleum Product | ≥ 26 gallons (or >1.32 gal to ground) | Outside Building to ground (dirt, pavement, concrete, containment, etc.) on property |
| Spill of liquid other than petroleum product | ≥ 2,640 gallons | Outside Building - effluent chemical, process liquor, etc. to ground (dirt, pavement, concrete, containment, etc.) on property |
| Spill of solid (sludge, pulp, etc.) | ≥ 11 dry short tons (or >5.38 gal to ground) | Outside Building to ground (dirt, pavement, concrete, containment, etc.) on property |
| A spill or other event in the mill that has a significant impact on the effluent treatment system. | | (i.e. sulfuric acid, chlorine, caustic, etc.) |



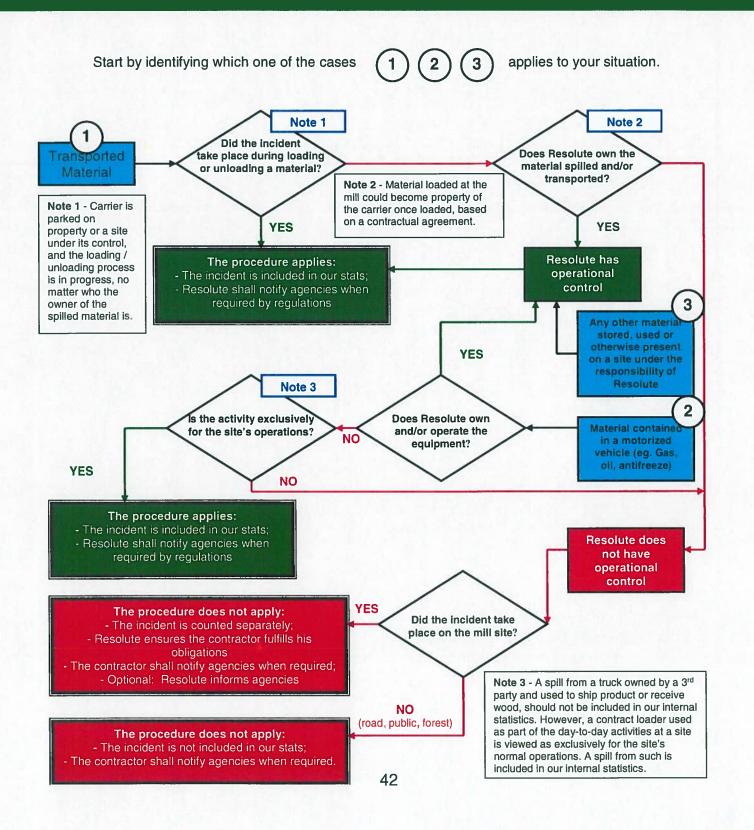
CLASS 3 Incidents – Low Severity examples:

| Incident Description | Quantity | Condition |
|--|--|---|
| Spills and releases of quantities below the threshold defining a Class 2 incident. | | Exceptions: small ODS releases should be reported to corporate, accumulated annually. Opacity limit exceedances that do not meet Class 2 are reported to corporate, accumulated annually. |
| Spills of potable, fire and uncontaminated water | ≥ 2,640 gallons | Outside Building |
| Spills of a chemical or petroleum product. | ≥ 260 gallons | Inside Building |
| Spills of pulp or white water | ≥ 2,640 gallons or ≥ 11 dry short tons | Inside Building |

Spill: Unplanned and accidental event. The planned and controlled draining of a tank to the sewer for maintenance purposes does not constitute a spill.



INCIDENT REPORTING APPLICATION GUIDE





APPENDIX C - Fire and HAZMAT Incident Response Procedures



Fire Incident Management

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 the ERT Team and use portable extinguishers, water hoses, and fire hoses up to 1 I/2" to extinguish initial fire. Individuals will evacuate area if fire cannot be extinguished or they would put themselves at risk to extinguish the fire.

Structural Fire Brigade

The Structural Fire Brigade is composed of ERT members specially trained in advanced firefighting techniques and the use of specialized equipment.

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.



If fire conditions exceed the management ability of the ERT any request for mutual aid goes through the McMinn County 911 Center (744-8105), who will dispatch two fire districts – Calhoun and Riceville (County Fire protocol). Bradley County will be requested only if needed.

All Emergency Response Team members will receive training at least quarterly, and they must be in good health and physically capable of performing the duties assigned.

Hazardous Material Release Management

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

Hazardous Materials Technician

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 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.

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 firefighting, 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.

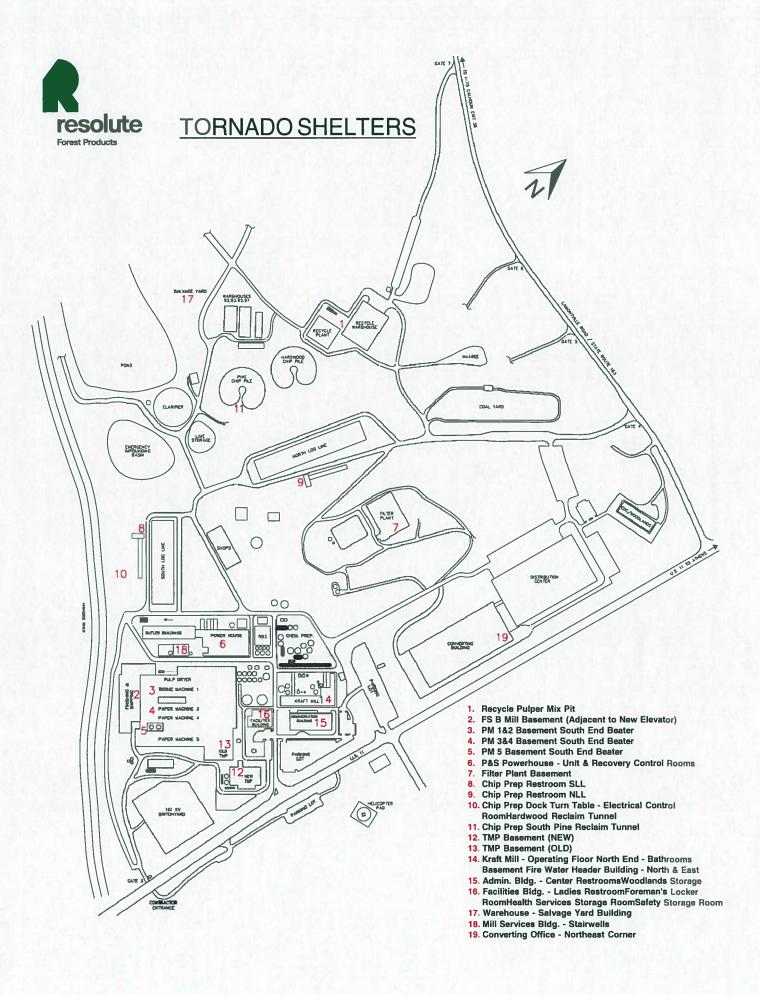


Appendix D – Tornado Shelters



Tornado Shelters

- 1. Recycle Pulper mixer pit
- 2. F/S B Mill Basement (Adjacent to New Elevator)
- 3. Tissue Stairwell by operating control room
- 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)
- 14. Kraft Mill -Operating Floor North End Bathrooms Basement Fire Water Header Building North & East
- 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
- 19. Converting Offices



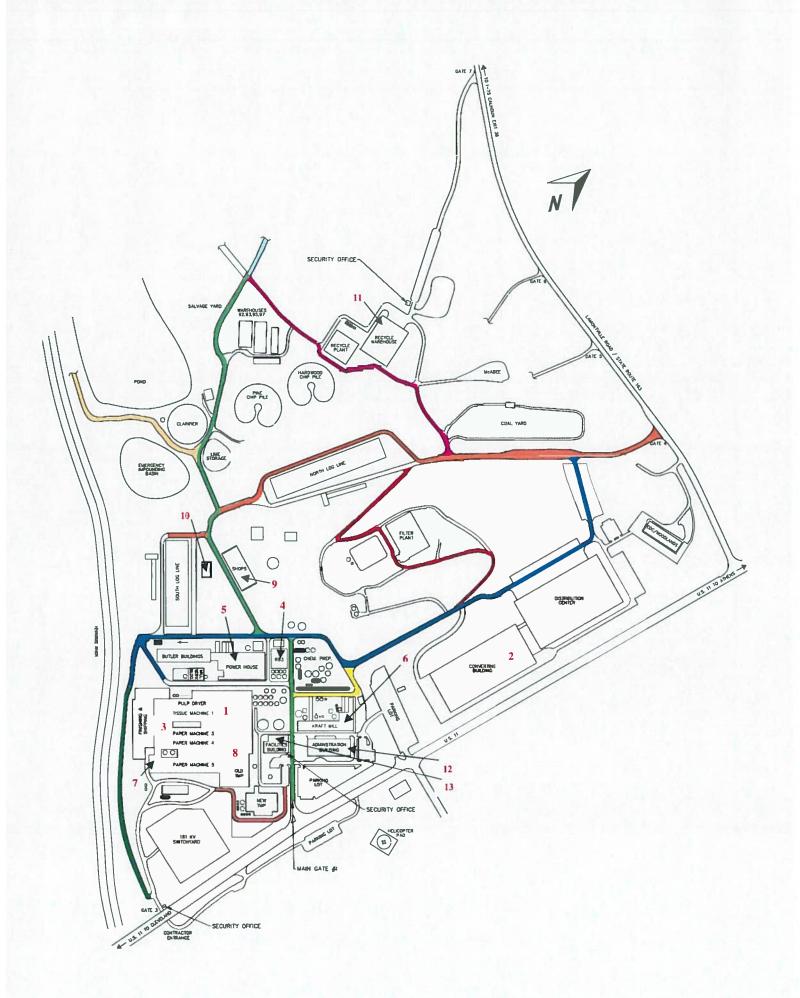


Appendix E – Shelter in Place locations



Shelter in Place Locations

- 1. Tissue control room operating floor
- 2. Converting main offices
- 3. Paper machines
 - a. Rack room between TM1 and PM3
 - b. Dry end lab Operating floor between PM offices and pulp dryer
- 4. Recovery control room 3rd floor
- 5. PB3 control turbine floor
- 6. Kraft Mill control room 3rd floor
- 7. PM5 office area
- 8. TMP control room 2nd floor
- 9. Garage office area
- 10. Chip Prep Log cabin
- 11. Recycle offices
- 12. Administration Building IT offices
- 13. Facilities Building





Appendix F – Bomb Threat Management



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 placed in a zip lock bag, retained and preserved. Make a list of the names of everyone who touched the materials. 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 Front and Back End On Call Managers
- Notify the Health and Safety Manager

Evaluation

Evaluation is the process for judging the credibility of the threat and 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. 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 determine if specific or Millwide evacuation will be needed.



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 or the Incident Commander 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.

If a partial or total evacuation is ordered all personnel in that area will evacuate immediately. The last person to exit the area will advise the Incident Commander the area is clear and areas will be taped off until the arrival of the regional law enforcement and Bomb Squad personnel.



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 within a radius of ten feet from a suspicious object. Cell phones, however do need to be turned off and use land lines 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 Bomb Squad to take command of the situation with respect to handling of the suspicious object.
- Depending on the circumstances, a partial or full evacuation may be implemented.
- ◆ The EMS/Security Office will ensure that the McMinn County EOC has been notified and that EMS and Health Services personnel are on standby.

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.
- Coordinate evacuation needs with local law enforcement.
- Conduct all searches of surrounding areas for suspect devices.
- Dispose of the suspect device.



Keith Cathey

Health and Safety Manager

Mill-Wide Emergency Response Plan

September 12, 2018

Approval:

Scott Palmer General Manager

Michael Yoder

Environmental Manager

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