High Bridge Wind Project Preliminary Emergency Action Plan

High Bridge Wind, LLC

2019

All emergencies shall be recorded in the Operations Electronic J5 Logbook to include: times, names, indications, probable causes, and actions taken. In addition, as appropriate, staff shall begin an accident investigation as soon as the emergency response actions are completed. Refer to the Calpine Standard No.6 for accident or incident investigation procedures.

High Bridge Wind Project
Preliminary Emergency Action Plan
2019

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EMERGENCY CONTACT LIST

CONTACT	NUMBER	NOTES
General Emergency Contacts		
General Emergency	911	
Guilford Fire Department	(607) 895-6814	
Chenango County Bureau of Fire and Emergency Management	(607) 334-5564	
New York State Police, Troop C; Troop HQ, Sidney Station	(607) 561-7400	
Chenango County Sheriff	(607) 334-2000	
Hospitals and Other Medical		
Bassett Healthcare Network A.O. Fox Tri-Town Campus	(607) 563-7080	In Sidney, NY.
UHS Chenango Memorial Hospital	(607) 337-4111	In Norwich, NY
Poison Center	(800) 222-1222	
Spill/Release Reporting; General Environmental: NOTE: All spill reports and other environment-related outreach will be made by the Plant Manager or their designee		
National Response Center	(800) 424-8802	Federally reportable spills/releases
New York State Spill Hotline	(800) 457-7362	State-reportable spills/releases
U.S. EPA Region 2	(877) 251-4575	Non-spill-related environmental emergencies
NYS Department of Environmental Conservation Region 7	(315) 426-7400	Non-spill-related environmental emergencies
General Municipal Outreach: NOTE: All outreach to the towns regarding emergency incidents will be made by the Director of Communications or their designee		
Town of Guilford Supervisor George Seneck	(607) 895-9966	Emergency incidents of general interest to community
High Bridge Wind Contacts		
High Bridge Plant Manager	TBD	
High Bridge Wind Operation and Maintenance (O&M) Manager	TBD	
High Bridge EH&S Manager	TBD	

NOTE: Contact details on supervisors, qualified first aiders, and other personnel will be listed on a separate sheet that will be issued with the Final Emergency Action Plan (EAP).

OVERVIEW OF EMERGENCY ACTION PLAN

1. Purpose and Overview of Plan

High Bridge Wind, LLC ("High Bridge Wind"), a wholly-owned subsidiary of Calpine Corporation ("Calpine"), has developed this preliminary Emergency Action Plan (EAP) to provide direction on emergency response during operation of the Project. An EAP addressing emergency response during construction will be developed by the Engineering, Procurement, and Construction (EPC) contractor, in consultation with High Bridge Wind, once the EPC contract has been awarded.

The Project will be located within the Town of Guilford, Chenango County, New York, on a site consisting of leased private lands that are rural in nature. A site plan that provides detailed information on the final layout of the Facility will be included in the Final EAP.

As required by 16 NYCRR § 1001.18(d) and (h), High Bridge Wind provided copies of this preliminary EAP and the Project's preliminary Site Security Plan for review and comment to the New York State Division of Homeland Security and Emergency Services and local emergency responders for the Town of Guilford and Chenango County. Responses received, and any changes made to this EAP as a result of such consultations, are summarized in the Application in Exhibit 18.

The EAP begins with a basic discussion of emergency notification and evacuation procedures. It then describes the actions to be taken to respond to specific types of emergencies, including:

- Injury/illness
- Fire
- Spills/releases
- Earthquakes
- Severe weather conditions (electrical storms, tornados, high winds, hurricanes, flooding, and snow or ice storms)
- Physical security threats and criminal activity (bomb or other security threats, discovery of suspicious package/device, active shooter or other violent situations, suspicious persons or activities, vandalism, equipment tampering, sabotage or trespassers.

2. Location/Distribution of Plan

A copy of the final EAP will be located in the operations and maintenance (O&M) building and will be provided to DPS Staff and the NYS Division of Homeland Security and Emergency Services. In addition, the final EAP will be furnished to local emergency responders to provide them with information about High Bridge Wind's emergency response procedures and to assist them in developing their own procedures for responding to incidents at the Project. The local emergency responders also will be invited to visit the Project to familiarize themselves with possible emergency response concerns.

3. Emergency Contacts and Related Information

A list of key emergency phone numbers (both internal and external) is included in the front of this plan.

4. Responsibility for Developing and Implementing Plan

High Bridge Wind is responsible for developing and updating this plan. An overview of the roles of individuals responsible for plan implementation is contained in Appendix A. The plan will be reviewed annually by the High Bridge Wind Operation and Maintenance Manager. Whenever problems with the plan are identified during and after an emergency, it will also be revised and updated, as appropriate. The results of these reviews will be recorded on the Record of Reviews and Revisions at Appendix F.

5. Emergency Equipment

A list of available emergency equipment is found in Appendix D.

6. Recordkeeping/Documentation

High Bridge Wind has prepared Response Action Checklists for specific categories of emergencies. These checklists must be completed by personnel responsible for implementing the emergency response following each emergency incident. All incidents must be reported/recorded in accordance with approved Calpine procedures.

PROJECT LOCATION

A map of the Project with a list of coordinates for each turbine is included as Appendix B.[1] This information can be used to direct emergency responders to the precise location of the emergency. The map includes the locations of evacuation assembly points.

EMERGENCY NOTIFICATION PROCEDURES

1. Communication Equipment

Communication is essential during an emergency. The following communications resources will be available:

- Each employee or contractor who is working at the Project will be required to carry a two-way radio. The two-way radios will be capable of:
  - Notifying Project personnel of an emergency; and
  - Providing immediate emergency instruction to personnel
- Also, it is anticipated that all personnel working at the Project will be carrying personal cell phones. **NOTE: The two-way radios are not capable of dialing 911 directly**. **In the event of an emergency, personnel can dial 911 on their cell phones or contact the Plant Manager using the two-way radios. The Plant Manager will call 911 and relay the necessary information to plant personnel.**
- Cisco IP phones will be located in O&M building
- Emergency pull stations for fire alarms will be located next to all exits of the O&M building.
- A satellite phone will be located in the O&M building.

[1] Coordinates reflect the proposed turbine locations at time of Application submission. The Final EAP will present the coordinates of the final turbine locations.

- Note: The satellite phone is a back-up to the emergency communications mentioned above. **Only use the satellite phone when all other forms of communications are inoperable.** You cannot dial 9-1-1 from Iridium phones. To access emergency services, a number is in place in the phone memory known as SOS* (767*).

The topography of the Project Site may affect how certain communications systems function. Communication systems employed by Project personnel will be tested at each turbine site to determine functionality.

2. Notification

If an emergency is occurring that poses an immediate threat to the health and safety of Project personnel or the surrounding community, make the following notifications:

- **CALL 911.** See Section 3 below for further instructions.
- **CONTACT THE PLANT MANAGER** and apprise them of the situation. The Plant Manager will provide instructions to on-site personnel and make the necessary communications, including outreach to the Operation and Maintenance Manager (O&M Manager) and any other necessary internal communications.

  If the emergency is specific to the Facility[2] and/or has the potential to affect the public (e.g., fires, hazardous material spills or releases, and certain physical security threats), the Plant Manager will notify host and adjacent landowners and the Town of Guilford Supervisor, as appropriate.

NOTE: If there is a question about whether an outside emergency response is necessary, call the Plant Manager first and ask for guidance.

3. Calling 911

WHEN CALLING 911, STAY CALM AND BE SPECIFIC. State the following:

- **Your Name**
- **High Bridge Wind Project**
- **Location of emergency**
  - Give the operator the location of the emergency by referring to the nearest turbine (identified by turbine number and/or coordinates), structure or road junction.
  - If the emergency involves injury/illness, indicate whether the person is out in the open, trapped in some fashion and/or at height within a turbine.
- **Available call back phone number**
- **Nature of the emergency.** Possible categories include, but are not limited to:
  - Medical emergency
  - Fire (turbine/equipment fire, brush fire, building fire)
  - Transport incident (passenger vehicle/truck; aircraft impact)

[2] This would not include general emergencies that would impact the community at large (e.g., earthquakes, snowstorms, etc.).

- Criminal activity/security threat

4. Other Immediate Notification Requirements

Certain incidents do not require notification of traditional emergency responders (fire departments and emergency medical services) but nevertheless require immediate outreach.

- **Spills/releases of petroleum or hazardous substances**
  - **Contact the Plant Manager** and apprise them of the circumstances. The Plant Manager will reach out internally to decide whether the spill/release must be reported to federal, State, and/or local authorities. See the Project's Spill Prevention, Control and Countermeasures Plan (SPCC Plan) for additional details relating to spill reporting.
- **Community/media outreach during/following major event**
  - If an incident involves a significant emergency response or is otherwise the focus of community or media attention, the Plant Manager will make the necessary internal notifications. All decisions regarding community or media outreach are made by High Bridge Wind's Director of Communications.

EVACUATION PLAN

Wind turbines such as those proposed for the High Bridge Wind Project pose little risk to the community. Setback requirements governing the location of the turbines and ancillary equipment protect people and structures in the vicinity of Project from potential harm in the event of an emergency. These factors minimize the potential need for community evacuation. However, events such as fire, earthquake, bomb threat or other security breach may require evacuation of the Project to protect the employees and contractors working there.

1. General Evacuation Procedures

The procedures below apply in the event evacuation of the O&M facility is required.

- **ASSESSMENT** The Plant Manager will evaluate the emergency to determine the severity of the event and whether a personnel evacuation is required.

- **NOTIFICATION** If evacuation is necessary, the Plant Manager or their designee will use Project's two-way radios, cell phones or other communications devices to give instructions as required.

- **EVACUATION**
  - Follow instructions of Plant Manager or their designee.
  - Proceed with extreme caution.
  - Depending on the type of emergency, observe the wind direction and travel upwind at all times.
  - Handicapped visitors will be escorted by Project personnel to the evacuation area.

- **ASSEMBLY POINTS** The Plant Manager or their designee will lead personnel to safety at the assembly point.
  - Maps depicting assembly points will developed prior to commencement of operation and will be appended to the Final EAP.

- **PERSONNEL ACCOUNTING** The Plant Manager or their designee will account for all personnel after assembling at the assembly point using the Visitor's Log and employee sign-in sheet.

2. Turbine Evacuation

Most turbine repair/maintenance activities are performed by teams of two employees/contractors. In the event dangerous conditions arise during turbine repair/maintenance activities (e.g., fire, thunderstorms other dangerous weather conditions), the affected employees/contractors will take the following steps:

- **ASSESSMENT/IMMEDIATE RESPONSE** The crews working at the turbine site will assess conditions, determine whether they pose an immediate safety threat, and initiate evacuation, if necessary.

- **NOTIFICATION** If conditions at the site are questionable, use two-way radios, cell phones or other communications devices to inform the Plant Manager of the situation and request guidance.

- If immediate evacuation is commenced without first consulting Plant Manager, contact the Plant Manager and apprise them of the situation once evacuation is completed.

- **EVACUATION** Climb down the tower and/or evacuate the area.

- **ASSEMBLY POINTS** The appropriate assembly point differs depending on the nature of the emergency. See the appropriate emergency-specific section of this EAP for instructions on where to assemble in the event of an emergency.

- **PERSONNEL ACCOUNTING** Personnel will contact the Plant Manager and report whether everyone at the location has been accounted for.

See Appendix C for procedures governing evacuation of injured persons from height.

NOTE: Local emergency responders do not have the equipment or training to climb the turbine tower and assist in lowering injured/ill individuals to the ground. Responsibility for this task rests solely with High Bridge Wind and/or its contractors.

MEDICAL PROCEDURE

1. Immediate Response to Injury/Illness Generally

If the emergency involves injury/illness to personnel, the following steps should be followed:

- **SURVEY THE SCENE** to confirm whether it is safe to enter
  - Ensure circuit is de-energized before touching victim in the case of electric shock

- **DO NOT MOVE VICTIM** unless it is unsafe for the victim to remain in a particular location

- **BRIEFLY EXAMINE THE VICTIM** to determine the severity of the injury/illness

- **CONTACT THE PLANT MANAGER OR DIAL 911 DIRECTLY IF VICTIM REQUIRES IMMEDIATE ATTENTION** and relay the necessary information to the 911 operator (see Emergency Notification Procedures above).
  - If personnel dial 911 directly using their cell phones, **contact the Plant Manager** afterwards and inform them of the injury/illness

- **ADMINISTER FIRST AID** as appropriate and in accordance with training
  - If the victim is conscious, ensure you have permission to help
  - If victim has stopped breathing, perform CPR and use the AED, if available, and it can be done safely
  - Stop bleeding by applying pressure directly to wound
  - Keep victim warm to help reduce the potential of shock until medical assistance arrives

  NOTE: All High Bridge Wind employees engaged in turbine operation and maintenance will be provided basic first aid and CPR training.

- **SEND AVAILABLE INDIVIDUAL** to meet the rescue unit and direct them to accident scene. A representative of High Bridge Wind will accompany the victim to the hospital.

If the victim does not require urgent medical attention, contact the Plant Manager and inform them of the injury/illness. If the injury can be addressed with first aid only (e.g., minor cuts and bruises), administer first aid. If further attention is required, the Plant Manager will arrange to take the injured person to the nearest hospital or urgent care center.

2. Special Requirements for Injuries/Illnesses at Turbine Height

See Appendix C for procedures governing evacuation and management of injured persons from height.

NOTE: Local emergency responders do not have the equipment or training to climb the turbine tower and assist in lowering injured/ill individuals to the ground. Responsibility for this task rests solely with High Bridge Wind and/or its contractors. Once a turbine supplier has been selected, High Bridge Wind will consult with the company to develop procedures for elevated rescue.

RESPONSE ACTION CHECKLIST - MEDICAL EMERGENCIES

	Action	Primary Responsibility	Completed?	Initials
1.	Survey scene and examine victim	Plant Personnel	☐	
2.	Call 911 or Plant Manager re: injury/location (if immediate response required).	Plant Personnel	☐	
3.	Notify Plant Manager of injury/location (if plant personnel contacted 911 directly via cell phone)	Plant Personnel	☐	
4.	Move injured person only if it is unsafe to remain in particular location	Plant Personnel	☐	
5.	Provide first aid	Plant Personnel	☐	
6.	Provide access and direction to emergency vehicles	Plant Personnel	☐	
7.	Notify O&M Manager	Plant Manager	☐	
8.	For minor injuries, transport to clinic or hospital, if necessary. O&M Manager or designee to accompany victim to hospital.	Plant Manager, O&M Manager or Designee	☐	
9.	Contact Environmental, Safety & Health	Plant Manager	☐	
10.	Follow-up on status of injured person.	Plant Manager	☐	

FIRE PROCEDURE

1. Non-Turbine Fires (e.g., O&M Building, other non-turbine structures)

In the event of a fire, the employee shall:

- **REPORT** the fire to the Plant Manager

- **EXTINGUISH** If the fire is small enough so as not to endanger personnel, determine the appropriate fire extinguisher and attempt to extinguish the fire
  - If the fire is successfully extinguished, report the outcome to the Plant Manager
  - Monitor the site to ensure the fire does not reignite.

- **ASSESS** the size and type of the continuing fire, sound the fire alarm (if any), and notify all personnel of the problem

- **CALL 911**

- **EVACUATE** all unnecessary personnel from the immediate area of fire. If necessary, follow the Evacuation Plan.

  Further details regarding the procedures necessary to address non-turbine fires will be provided in the Final EAP.

2. Turbine Fire

In the event of a fire at a turbine while crews are working, employees shall:

- **REPORT** the fire to the Plant Manager

- **EXTINGUISH** If the fire is small enough so as not to endanger personnel, determine the appropriate fire extinguisher and attempt to extinguish the fire
  - If the fire is successfully extinguished, report the outcome to the Plant Manager
  - Evacuate the turbine and await further instructions.

- **EVACUATE THE TURBINE** if the fire cannot be easily extinguished, use the fire extinguisher to create a safe evacuation route and evacuate to a designated safe location

- **CALL 911** upon reaching safe location

- **EXIT THE TURBINE** and report back to the Plant Manager

- **ESTABLISH A CONTROLLED AREA** of approximately 200 feet around the base of the turbine. **DO NOT ENTER THE CONTROLLED AREA.** Allow fire debris to fall freely within the controlled area. Watch for debris to go beyond the controlled area and for possible brush fires
  - If brushfire starts and is small enough so as not to endanger personnel, determine appropriate fire extinguisher and attempt to extinguish fire.

- **EVACUATE THE AREA IF FIRE POSES AN IMMEDIATE RISK** Otherwise wait for the arrival of the local fire department.

  Further details regarding the procedures necessary to address turbine fires will be provided in the Final EAP once the final turbine model is selected.

NOTE: As a matter of industry practice, fires in the nacelle that cannot be immediately extinguished are typically allowed to burn themselves out. Local fire departments are called in the event of a turbine fire to prevent the fire from spreading on the ground. Local fire departments typically are not equipped to extinguish fires at height.

RESPONSE ACTION CHECKLIST – FIRE

	Action	Primary Responsibility	Completed?	Initials
1.	Notify O&M building of fire, including location and size.	Plant Personnel	☐	
2.	Attempt to extinguish fire with portable extinguisher, if safe to do so.	Plant Personnel	☐	
3.	Call 911 and request firefighting assistance, if necessary.	Plant Personnel or Plant Manager	☐	
4.	Notify O&M Manager	Plant Manager	☐	
5.	Assess extent of fire and take appropriate action.	Plant Manager or Designee	☐	
6.	Evacuate building/turbine if necessary	O&M Building (Plant Manager); Turbine Fire (Plant Personnel)	☐	
7.	Establish sterile zone (Turbine Fire only)	Plant Personnel/O&M Manager	☐	
8.	Assess extent of injuries and missing people.	Plant Manager or Designee/ Plant Personnel/ O&M Manager	☐	
9.	Administer first aid	Plant Personnel	☐	
10.	Call 911 and request medical assistance and/or a rescue unit, if either is necessary.	Plant Manager	☐	
11.	Provide access and direction to emergency personnel.	Plant Personnel	☐	
12.	Provide advice and assistance for rescue, utilities, location of oil and hazardous materials, etc.	O&M Manager /Plant Manager	☐	
13.	Contact Environmental, Safety & Health.	Plant Manager	☐	
14.	Follow up on status of injured personnel	Plant Manager	☐	

HAZARDOUS MATERIAL SPILL OR RELEASE

Various equipment at the Project, including the turbines, contains hydraulic and other oils. In addition, certain equipment may contain hazardous chemicals such as antifreeze or corrosives. Also, oils and chemicals may be used when operating/maintaining the Project.

In the event of an oil, hazardous waste, or chemical spill or chemical exposure accident, personnel shall perform the following procedures as applicable:

- **IF PERSONNEL DIRECTLY EXPOSED TO CHEMICAL CONTAMINATION**, take the following steps
  - Begin flushing area immediately with water.
  - **Call 911** if emergency attention required
  - Obtain Safety Data Sheet (SDS) from 3E online or O&M building to aid in administering first aid. Send the SDS with the victim to the hospital.

- **REPORT** the incident immediately to the Plant Manager, including extent of any injuries, if any, type of material spilled, amount, direction, and whether spill has impacted water or other sensitive environmental receptors. The Plant Manager will initiate procedures to determine whether the spill must be reported to federal, State or local authorities and/or whether a third party must be called to assist in responding to/remediating the spill.

- **ISOLATE/STOP SPILL** (i.e., close valve/stop pump) unless it cannot be done safely.

- **EVACUATE AND CORDON OFF AREA OF SPILL** Remove any unnecessary personnel from the immediate area of the release, and upwind if appropriate. If the incident is a large, uncontrollable and/or dangerous, tell the Plant Manager and follow the Evacuation Plan. Use appropriate Personal Protective Equipment (PPE)

- **ASSESS EXTENT OF SPILL** (amount and type of material spilled, fire potential, whether contained, etc.)

- **CONTAIN SPILL** using appropriate spill kit (oil or chemical)

- **CLEAN UP THE SPILL** as instructed by Plant Manager.
  - For larger spills, a third party contractor may be called in to clean up the spill/release.

RESPONSE ACTION CHECKLIST– HAZARDOUS MATERIAL SPILL OR RELEASE

	Action	Primary Responsibility	Completed?	Initials
1.	Assess whether spill resulted in direct exposure to personnel and implement first aid if necessary	Plant Personnel	☐	
2.	Call 911 if exposed persons require immediate medical attention	Plant Personnel	☐	
3.	Notify O&M Manager of spill and spill location	Plant Personnel	☐	
4.	Isolate/stop spill (close valve, stop pump), if it can be done safely	Plant Personnel	☐	
5.	Evacuate and cordon area (i.e., remove unnecessary personnel). Use appropriate PPE	Plant Personnel/Plant Manager	☐	
6.	Notify Plant Manager	O&M Manager	☐	
7.	Assess extent of spill (contained or uncontained). Contain spill if possible	Plant Personnel/O&M Manager	☐	
8.	Clean up spill as directed by Plant Manager or wait for cleanup contractor	Plant Personnel/O&M Manager	☐	
9.	Contact Environmental, Health & Safety	Plant Manager	☐	
10.	If repairs are necessary initiate repairs.	O&M Manager/Plant Manager	☐	
11.	If spill is reportable, make agency notifications. (See SPCC for list of agency contacts).	Plant Manager or Designee	☐	
12.	Provide access and directions to emergency and cleanup personnel.	Plant Personnel/O&M Manager	☐	
13.	Follow-up on status of injured, if any.	Plant Manager	☐	

EARTHQUAKE

1. During Earthquake

- **IF INSIDE** stay Inside.
  - Lie to the side of a solid piece of furniture, such as a desk or table.
  - Stay clear of windows, mirrors, bookshelves, and file cabinets

- **IF OUTSIDE** go to a clear area away from turbine towers, buildings, trees, power lines and poles
  - Get low to the ground and balance yourself.
  - If there is no open area, seek available shelter (such as a vehicle) to avoid falling objects.

2. After Earthquake

- **BE PREPARED FOR AFTERSHOCKS** which may continue for several minutes

- **CALL 911** if any personnel require immediate medical attention

- **EVACUATE** to your assembly point if you feel safe in doing so
  - Do not leave the location until accounted for by the Plant Manager

- **NOTIFICATION** Notify the Plant Manager of your status, location and circumstances (damage, fire, injuries, etc.)

- **ADMINISTER FIRST AID** to any injured persons

- **INSPECT BUILDING/AREA** The Plant Manager or designee will inspect building/area for fires, downed power lines, and other damage, including evaluating potential for future damage caused by aftershocks

NOTE: Wind turbines are equipped with over vibration sensors that will automatically shut down the turbine in the event of a severe earthquake. Accordingly, no shut down process is necessary.

NOTE: In the event of a major earthquake, be prepared to be without power, water and any emergency assistance from outside agencies for a significant length of time.

RESPONSE ACTION CHECKLIST – EARTHQUAKE

	Action	Primary Responsibility	Completed?	Initials
1.	Follow basic procedures depending on whether inside or outside during quake.	Plant Personnel	☐	
2.	After quake, call 911 if any personnel require immediate medical attention	Plant Personnel	☐	
3.	Evacuate to assembly point if safe to do so and account for personnel on-site	Plant Personnel/O&M Manager	☐	
4.	Notify Plant Manager of status, location and circumstances following quake (property damage, fire risk, injuries, etc.)	Plant Personnel	☐	
5.	Administer first aid, if properly trained	Plant Personnel/ Plant Manager /O&M Manager	☐	
7.	Assess impact on plant and take appropriate action.	O & M Manager	☐	
8.	Contact Environmental, Health & Safety.	Plant Manager	☐	

SEVERE WEATHER
(ELECTRICAL STORMS, TORNADOES, HURRICANES, FLOODING, SNOW STORMS)

Warnings of electrical storms, tornadoes, hurricanes, flooding and snowstorms that have the potential to impact the safety of High Bridge Wind-affiliated workers and the community are typically distributed by the local government emergency organization via radio and television stations. In the event any employee becomes aware of a severe weather warning, the Plant Manager must be notified. The Plant Manager will determine if shelter in place or evacuation of plant personnel is necessary. **If conditions in the field indicate the weather poses an immediate risk, plant personnel may take appropriate measures to protect themselves (depending on particular weather emergency) and then contact the Plant Manager.**

Morning safety meetings will cover forecasted weather conditions for the day. In addition, weather forecasts will be reviewed throughout the day. Potentially significant changes in weather conditions during the day will be communicated by the Plant Manager to personnel in the field.

Below are procedures to follow if facing specific weather conditions.

1. Electrical Storms (i.e., Thunder/Lightning)

Thunderstorms are a common occurrence in the summer months in upstate New York. The measures to be followed depend, in part, on whether personnel are in the O&M building or out in the field.

O&M Building

- **NOTIFICATION** The Plant Manager will inform personnel if thunderstorms are occurring the in area.

- **REMAIN INDOORS** If outside and thunderstorms are occurring within thirty (30) miles of the O&M building go indoors
  - Stay away from open doors and windows, metal pipes, electrical appliances and other conductive equipment/structures
  - Avoid use of telephone, washing hands, or any contact with conducting surfaces and exposure to the outside (metal door and window frames, electrical, telephone and cable wiring, plumbing)
  - All clear will be issued when lightning is thirty (30) miles or more from the site

Field Work, Including Turbine Crews

- **ADVANCE NOTIFICATION**
  - **Initial warning** to technicians using available communications devices (two-way radios, cell phones) will be issued when lightning is detected within thirty (30) and fifty (50) miles of the work site.

- **Immediate work stand down** will be called when lightning is detected within thirty (30) miles of the work site.
    - ✓ Technicians will be ordered to immediately stop work and head to their vehicles until the storm passes.
- **Plant Manager will confirm that all employees are accounted for and down from the tower(s)**
- **Technicians will be directed to return to the O&M building or stay in the field** until the lightning passes.
- **All clear will be issued** when lightning is thirty (30) miles or more from the work site.

- **NO ADVANCE NOTIFICATION**
    - **Thunder heard** indicating thunderstorm is likely to be within ten (10) miles of the site.
    - **If inside the tower,**
        - ✓ Immediately proceed to one of safe zones within the tower (platforms under the yaw section and at ground level, but not in front of electrical cabinets)
        - ✓ Sit or stand in the center of the platform without touching the tower walls
    - **If outside the tower,**
        - ✓ Take shelter in the tower or a vehicle immediately.
    - **Contact the Plant Manager and report circumstances**

- **APPLY 30/30 RULE IF UNABLE TO RECEIVE INSTRUCTIONS FROM PLANT MANAGER ON LOCATION/DIRECTION OF STORM**
    - **If you see lightning strike** count out 30 seconds. If you hear thunder within 30 seconds, storm is close enough to stop job for 30 minutes.
    - **Seek shelter** in safe zones in tower or vehicle.

- **GENERAL LIGHTNING SAFETY GUIDANCE**
    - **Be alert before and after storms**
        - ✓ If you can see lightning and/or hear thunder, you are already potentially at risk and should seek shelter.
        - ✓ Many lightning casualties occur as the storm approaches and after the perceived threat has passed.
    - **Avoid being in or near**
        - ✓ Communication towers, isolated trees, light poles, metal fences
        - ✓ Open fields
        - ✓ Open water
    - **If taking shelter in vehicle**
        - ✓ Avoid touching any metal objects with inside-to-outside connection
    - **If driving**
        - ✓ Pull off to side of road in safe manner (low area, not on a hill)
        - ✓ Turn on emergency blinkers, turn off engine, and wait out storm with hands in lap
    - **If operating heavy equipment (e.g., boom trucks, cranes, bulldozers, loaders, etc.) which employ rollover system canopy**

- ✓ Shut down equipment, close doors, and wait out storm with hands in lap
- ✓ If operating boom truck or crane, retract boom and place in the boom rack

- **SPECIAL INSTRUCTIONS (TURBINES)**
  - **After storm has passed wait at least one hour before approaching equipment.**
    - ✓ If you hear hissing or crackling sound, this may be a sign that the wind turbine is holding a charge. **DO NOT TOUCH**
    - ✓ If waiting out storm in vehicle, maintain a distance of at least 80 feet between the parked vehicle and a turbine.

2. Tornados

Although tornados are not common in upstate New York, they have occurred. To prepare for a possible tornado, it is important to know the difference between a tornado watch and a tornado warning.

- **Tornado Watch:** Conditions are favorable for tornados to develop.
- **Tornado Warning:** Either official spotters have sighted a tornado or Doppler radar has reported a developing tornado. A tornado warning is typically issued for a small area (possible one or two counties) for less than an hour.

Tornado Notification/Safety

As noted at the outset, weather issues are discussed in the morning briefing and monitored throughout the day.

- **TORNADO WATCH ISSUED** in the area. Take the following steps
  - Designate a person to monitor a radio or other information source
  - Notify all affected site personnel of the tornado watch and ensure they are in immediate contact if an emergency arises
  - If conditions warrant, remove personnel from the field

- **TORNADO WARNING ISSUED** in the area. Take the following steps
  - **If in the O&M building or other building**
    - ✓ Go at once to a windowless interior room, storm cellar, or basement
    - ✓ If not available, go to an inner hallway or a small inner room without windows such as a bathroom or closet
    - ✓ Bring radio or other equipment to monitor status of tornado warning
    - ✓ Stay away from windows, doors and outside walls
  - **If in the field**
    - ✓ If possible, get inside a building
    - ✓ If shelter is not available, lie in a ditch or low-lying area or crouch near a strong building; do not enter the turbine
    - ✓ Use arms to protect head and neck
  - **If in a car**

- ✓ Get out of the car immediately and follow the above field procedures. **DO NOT ATTEMPT TO OUTDRIVE A TORNADO**

After Tornado

- **CALL 911** if any personnel require immediate medical attention
- **NOTIFICATION** Notify the Plant Manager of your status, location and circumstances (property damage, fire, injuries, etc.)
- **TURN ON RADIO OR TELEVISION** to get latest emergency information
- **BE AWARE OF YOUR SURROUNDINGS**
  - Watch for downed power and telephone lines, falling debris and chemical/petroleum spills
- **ADMINISTER FIRST AID** to any injured persons if qualified to do so
- **STAY OUT OF DAMAGED BUILDINGS/STRUCTURES**
  - The Plant Manager or designee and/or State/local authorities will inspect buildings to ensure they are safe. **RETURN ONLY WHEN AUTHORITIES SAY IT IS SAFE**

3. High Winds

High winds may occur independent of a storm event. If weather forecasts predict high wind conditions, the following steps will be taken to protect field crews.

High Wind Notification and Safety

- **ADVANCE NOTIFICATION**
  - **Initial warning** to technicians in the field using available communications devices (two-way radios, cell phones) will be issued when winds are detected that could potentially pose a safety risk.
  - **Immediate work stand down** will be called when wind speeds exceed dangerous levels.
    - ✓ Technicians will be ordered to immediately stop work and head to their vehicles until the conditions abate.
  - **The Plant Manager will confirm that all employees are accounted for and down tower**
  - **Technicians will be directed to return to the O&M building or stay in the field** until the conditions abate.
  - **All clear will be issued** when wind speeds fall to safe levels.

After High Wind Event Over

- **FOLLOW POST TORNADO PROCEDURES** above.

NOTE: Wind turbines are equipped with sensors that will automatically shut down the turbine in the event of a high winds. Accordingly, no shut down process is necessary.

4. Hurricanes

Although hurricanes are not common in upstate New York, they have occurred. However, unlike tornados, warnings for hurricanes are typically issued several days in advance, allowing time to prepare.

Hurricane Notification, Preparation, and Safety

As noted at the beginning of this section, weather issues are discussed in the morning briefing and monitored throughout the day. Certain basic measures should be taken at all Project-related sites.

- **Beginning 48 Hours Prior to Expected Hurricane Arrival (Construction Site and Project, including O&M Building)**
  - Dispose of any loose debris off-site
  - Relocate outdoor equipment or other items that may become "missiles"
  - If possible, secure any heavy outdoor equipment that cannot be moved indoors or relocate it off-site
  - Cover critical stock and equipment that cannot be moved with waterproof tarpaulins
  - Relocate containers of all petroleum and chemicals (other than that in heavy equipment) indoors or off-site

- **Beginning 48 Hours Prior to Expected Hurricane Arrival (O&M Building Only)**
  - Review building exterior and make repairs to any loose tiles, flashing, etc. as time allows
  - Verify roof drains, storm drains and catch basins are clean (i.e., free of debris)
  - Protect or relocate vital business records
  - Raise critical equipment off floors
  - Install manual protection systems (e.g., shutters, plywood covers and/or flood gates)
  - Verify all fire protection systems are in service
  - Set up flood barriers at all first floor doors and entrances

- **24 Hours Before Expected Arrival** End all work at the Project Site and evacuate.

Post-Hurricane Activities

- **AFTER THE HURRICANE**
  - O&M Manager, in consultation with the Plant Manager, will conduct safety assessment of O&M building, substation and other critical components
    - ✓ Identify hazards

- ✓ Verify status of protection systems (alarms, security systems, etc.)
- ✓ Expedite necessary repairs and cleanup

- **AFTER THE HAZARD ASSESSMENT**
  - If site deemed safe to return by Plant Manager, an ALL CLEAR will be communicated to personnel, authorizing their return to the Project.

5. Floods/Significant Rain Events

The Project is located outside floodplains and so is unlikely to be affected by floods. The primary risk of flooding is related to transportation to/from the Project. If a flooding is occurring while driving:

- **DO NOT DRIVE THROUGH STANDING WATER.** Areas of standing water may be deeper than they appear. If you come across standing water, take an alternate route.
- **IF YOU ARE FORCED TO DRIVE THROUGH STANDING WATER** take the following precautions:
  - Do your best to estimate the depth of the water (watch other cars driving through and note how deep the water seems to be)
  - Drive slowly and steadily through the water
  - Avoid driving through water that downed electrical lines have fallen in
  - Watch for items traveling downstream
  - If you become trapped in rising water, immediately abandon the vehicle for higher ground. Try to open the door or roll down the wind to get out of the vehicle. If you are unable to get to safety, call 911

6. Snowstorms

Chenango County receives more than 80 inches of snow annually and is the site of major snow and ice storms. The following steps will be followed to protect employees from sudden snow and ice events.

- **NOTIFICATION** The O&M building tracks weather conditions. If a major snow/ice storm is predicted, the Plant Manager will inform on-site personnel and implement procedures for early release.

- **PREPARATION** Supplies will be maintained in the O&M building to shelter employees who become stranded at the site (e.g., food, drinking water, comfort items).

- **FOLLOWING THE SNOW EMERGENCY**, repair any damage, remove snow and ice from parking lot, roads, walkways, and work platforms.

RESPONSE ACTION CHECKLIST – SEVERE WEATHER

	Action	Primary Responsibility	Completed?	Initials
1.	Monitor weather conditions and report to plant personnel	Plant Manager	☐	
2.	Assess weather conditions in the field and report concerns to Plant Manager	Plant Personnel	☐	
3.	Electrical Storms/Wind/Tornados Notify plant personnel when (1) lightning detected within 30-50 miles of work site; (2) winds between __ and __ miles per hour detected at work site; or (3) tornado watch issued	Plant Manager	☐	
4.	Electrical Storms/Wind/Tornados Order work stand-down when (1) lightning detected within 30 miles of work site: (2) winds are above __ miles per hour at work site; or (3) tornado watch conditions merit removal from field	Plant Manager	☐	
5.	Electrical Storms or Other Sudden Weather Changes Immediately proceed to safe areas if thunder heard in field and no previous warning was issued	Plant Personnel	☐	
6.	After serious weather event, call 911 and request medical assistance, if necessary	Plant Personnel	☐	
7.	After weather event, contact Plant Manager and advise regarding status of personnel/Project and receive instructions	Plant Personnel	☐	
8.	Assess impact on plant and take appropriate action	O & M Manager	☐	
9.	Contact Environmental, Health and Safety.	Plant Manager	☐	

PHYSICAL SECURITY THREAT

BOMB OR OTHER SECURITY THREAT, DISCOVERY OF SUSPICIOUS PACKAGE/DEVICE, ACTIVE SHOOTER OR OTHER VIOLENT SITUATION, SUSPICIOUS PERSON OR ACTIVITY/TRESPASSER, AND VANDALISM, EQUIPMENT TAMPERING, SABOTAGE OR TRESPASSING

1. Bomb or Other Security Threat

- **REMAIN CALM**

- **IF TELEPHONE THREAT IS RECEIVED**
  - Keep the caller on the line as long as possible to obtain the most information you can.
  - Use the Security Threat Checklist included at the end of this section as a questioning guide to organize and document the conversation.

- **IF WRITTEN THREAT IS RECEIVED**
  - Preserve and protect the document with an outer cover; limit contact with the document
  - If threat is received electronically, do not delete it.

- **NOTIFICATION**
  - Notify the Plant Manager as soon as possible.
  - Call **911**
    - ✓ **DO NOT USE TWO-WAY RADIOS WHEN A BOMB IS SUSPECTED TO BE ON-SITE.** A two-way radio transmission can set off a bomb
  - Notify applicable agencies related to the following NERC Standards, if necessary:
    - ✓ EOP-004-1- REL-STDs-Contacts
    - ✓ CIP-001-1- REL-STDs-Contacts

- **DETERMINE THE COURSE OF ACTION** in conjunction with local authorities
  - **DO NOT ATTEMPT TO LOCATE ANY SUSPICIOUS DEVICE.** Leave the site investigation to the experts.

- **EVACUATE** if needed. Begin site evacuation to the designated assembly point. Pay particular attention to anyone who is listed onsite and does not report to the safe zone. Inform the authorities of anyone missing and their last known whereabouts

2. Discovery of a Suspicious Package/Device

- **NOTIFICATION** If a suspicious package is identified, make the notifications identified under Item 1, Bomb or Other Security Threat.

- **EVACUATE** Immediately evacuate the area in accordance with the procedures in the evacuation section of this EAP.

- **DETERMINE THE COURSE OF ACTION** in conjunction with local authorities
  - **DO NOT MOVE/OPEN SUSPICIOUS PACKAGES/DEVICES**

3. Active Shooter or Other Violent Situations

- **NOTIFICATION Call 911**

- **EVACUATE**
  - Have an escape route and plan in mind
  - Leave belongings behind
  - Keep your hands visible

- **HIDE OUT** If evacuation not possible
  - Hide in an area out of the shooter's view
  - Block entry to your hiding place and lock the doors
  - Silence your cell phone and/or pager

- **TAKE ACTION** As a last resort and only when your life is in imminent danger
  - Attempt to incapacitate the shooter
  - Act with physical aggression and throw items at the active shooter

Additional information about responding to an active shooter situation can be found in the U.S. Department of Homeland Security's Active Shooter Pocket Card included at the end of this Section.

NOTE: If an intruder is making an attack on the perimeter of the Project, lock all doors, take cover and call 911.

4. Suspicious Person or Activity

- **NOTIFICATION**
  - Plant personnel who observe a suspicious person or activity must immediately report the incident to the Plant Manager.
  - The Plant Manager, in consultation with the O&M Manager, will decide whether to contact the police.

5. Vandalism, Equipment Tampering, Sabotage, Trespassers

- **NOTIFICATION** If evidence of vandalism, equipment tampering, sabotage or trespass is discovered
  - Contact the Plant Manager
  - The Plant Manager, in consultation with the O&M Manager, will decide whether to contact the police

- **FOLLOW-UP ACTIONS** The O&M Manager will
  - Investigate the incident
  - Decide, with the Plant Manager, whether to implement security upgrades. See the High Bridge Wind Site Security Plan for details.

High Bridge Wind Project
Preliminary Emergency Action Plan

SECURITY THREAT – CALLER INFORMATION CHECKLIST

Try to Record the Caller's Exact Words:

_____
_____
_____
_____
_____
_____
_____

Do Not Interrupt the Caller Except to Ask:

Where is the device located? _____

When will the device explode? _____

What kind of device is it? _____

What does it look like? _____

Why are you doing this? _____

Who are you? _____

Description of the Caller:

Male Female Adult Juvenile Approximate Age of the Caller: _____

Voice Characteristics	Speech	Language	Accent	Manner	Background Noises
__ Loud __ Soft __ High Pitch __ Deep __ Raspy __ Pleasant __ Intoxicated __ Other	__ Fast __ Slow __ Distinct __ Distorted __ Stutter __ Nasal __ Slurred __ Precise __ Other	__ Excellent __ Good __ Fair __ Poor __ Foul __ Other	__ Local __ Not Local __ Foreign __ Regional __ Race __ Pleasant __ Other	__ Calm __ Angry __ Rational __ Irrational __ Coherent __ Incoherent __ Deliberate __ Emotional __ Righteous __ Laughing __ Other	Office __ Machines Factory __ Machines __ Traffic __ Airplanes __ Trains __ Voices __ Music __ Alarms __ Quiet __ Other

RESPONSE ACTION CHECKLIST– SECURITY THREAT

	Action	Primary Responsibility	Completed?	Initials
1.	If a threatening call is received, REMAIN CALM, KEEP THE CALLER ON THE LINE, and follow the CALLER INFORMATION CHECKLIST on next page	Anyone	☐	
2.	If threat received by mail/email or if suspicious package received, preserve item as specified in procedure	Anyone	☐	
3.	Notify Plant Manager of bomb threat, suspicious package or breach of security	Anyone	☐	
4.	Notify Management.	Plant Manager	☐	
5.	Call 911 – State your name, the nature of the problem, and the specific location of the problem (if known)	Plant Manager or Designee / Plant Manager	☐	
6.	Notify applicable agencies related to the following NERC Standards, if necessary: EOP-004-1 and CIP-001-1	Plant Manager	☐	
7.	Assess security threat and take appropriate action. DO NOT send employees to search for a bomb – wait for emergency personnel to arrive.	Plant Management	☐	
8.	If evacuation is necessary, notify personnel (Do not use radios or cell phones).	Plant Manager	☐	
9.	If shutdown is necessary, shutdown the turbines.	Plant Manager	☐	
10.	Provide access to emergency personnel.	Plant Personnel	☐	
11.	Contact Environmental Health and Safety	Plant Manager	☐	

ACTIVE SHOOTER POCKET CARD

COPING

WITH AN ACTIVE SHOOTER SITUATION

- Be aware of your environment and any possible dangers
- Take note of the two nearest exits in any facility you visit
- If you are in an office, stay there and secure the door
- Attempt to take the active shooter down as a last resort

Contact your building management or human resources department for more information and training on active shooter response in your workplace.

PROFILE

OF AN ACTIVE SHOOTER

An active shooter is an individual actively engaged in killing or attempting to kill people in a confined and populated area, typically through the use of firearms.

CHARACTERISTICS

OF AN ACTIVE SHOOTER SITUATION

- Victims are selected at random
- The event is unpredictable and evolves quickly
- Law enforcement is usually required to end an active shooter situation

CALL 911 WHEN IT IS SAFE TO DO SO

HOW TO RESPOND

WHEN AN ACTIVE SHOOTER IS IN YOUR VICINITY

1. Evacuate

- Have an escape route and plan in mind
- Leave your belongings behind
- Keep your hands visible

2. Hide Out

- Hide in an area out of the shooter's view
- Block entry to your hiding place and lock the doors
- Silence your cell phone and/or pager

3. Take Action

- As a last resort and only when your life is in imminent danger
- Attempt to incapacitate the shooter
- Act with physical aggression and throw items at the active shooter

CALL 911 WHEN IT IS SAFE TO DO SO

HOW TO RESPOND

WHEN LAW ENFORCEMENT ARRIVES

- Remain calm and follow instructions
- Put down any items in your hands (i.e., bags, jackets)
- Raise hands and spread fingers
- Keep hands visible at all times
- Avoid quick movements toward officers such as holding on to them for safety
- Avoid pointing, screaming or yelling
- Do not stop to ask officers for help or direction when evacuating

INFORMATION

YOU SHOULD PROVIDE TO LAW ENFORCEMENT OR 911 OPERATOR

- Location of the active shooter
- Number of shooters
- Physical description of shooters
- Number and type of weapons held by shooters
- Number of potential victims at the location

APPENDIX A – GENERAL RESPONSIBILITIES

Below is a general overview of the responsibilities of High Bridge Wind personnel for developing and implementing the Emergency Action Plan (EAP). To the extent the general responsibilities identified here differ from those described elsewhere in this plan, the more specific discussions elsewhere control.

The three major categories of personnel involved in emergency response at wind farms are plant personnel (i.e., O&M technicians), the Operation and Maintenance Manager (O&M Manager), and the Plant Manager. Their basic roles and responsibilities with respect to emergencies are set forth below.

Plant Personnel

The employees conducting day-to-day operation and maintenance activities at the High Bridge Wind Project are responsible for basic emergency preparation and response activities, including, but not limited to: completing training on the EAP; determining whether an incident (i.e., injury/illness, fire, etc.) requires an immediate response and dialing 911, if necessary; communicating with the Plant Manager; performing basic emergency response activities (e.g., extinguishing small fires, administering first aid); monitoring site conditions to determine whether a work stand down is necessary; and assisting with other emergency response activities as directed by the O&M Manager and/or Plant Manager.

Note: All plant personnel will be provided with basic fire response and first aid training.

Operation and Maintenance Manager (O&M Manager)

The O&M Manager directly oversees the work of the plant personnel in the field and provides on-site supervision in emergency situations. In an emergency, the Plant Manager will notify the O&M Manager who will generally be expected to visit the scene of the emergency and provide assistance. In that capacity, the O&M Manager's responsibilities include directly supervising emergency response activities, communicating developments to the Plant Manager, and providing assistance to on-site personnel.

Plant Manager

The Plant Manager is responsible for the safety and security of all Project personnel, contractors, visitors, and equipment. Among other things, the Plant Manager is responsible for: reviewing and approving this EAP and scheduling and coordinating EAP training. In an emergency, the Plant Manager is responsible for incident communication within High Bridge Wind and for overseeing the emergency response.

The Plant Manager will provide any personnel and/or operational changes that may affect this plan to the appropriate EH&S Specialist so the plan can be updated, and if necessary, so personnel may be trained on those updates.

EH&S Specialist

The EH&S Specialist will prepare the Final EAP and review and update it as necessary, but not less frequently than annually.

APPENDIX B – SITE MAP, INCLUDING ASSEMBLY POINTS AND LIST OF TURBINES/COORDINATES

Site maps identifying key Project components and assembly points will be supplied prior to beginning construction of the Project. The maps will include a list of turbines with their identification numbers and coordinates.

APPENDIX C – PROCEDURES FOR RESCUE FROM TURBINE HEIGHTS

The equipment/procedures for rescuing employees from turbine heights will be established once the turbine model has been selected and prior to beginning construction of the Project.

APPENDIX D – EMERGENCY EQUIPMENT AND LOCATIONS

Emergency Response Supplies	**Location**
First Aid Kit /CPR Kit / Burn Kit / Bloodborne Pathogen Kit	O&M building; also basic first aid kits on O&M trucks
Heart Stream AED Unit	O&M building
Oil Spill Kit	O&M building and trucks
Chemical Spill Kits (5 gallon buckets)	O&M building
Fire Extinguishers	O&M building; potentially each turbine location
Emergency Response Alarms & Devices	**Location**
Fire Emergency Pull Stations	O&M building
Fire Alarm Panel	Each turbine location
Smoke Detection Systems	O&M building; each turbine location
Fire Alarm Panel	Each turbine location
Emergency Rescue Equipment (for lowering injured/ill person from tower)	TBD

APPENDIX E – TRAINING

All High Bridge Wind-affiliated employees responsible for operation and maintenance of the Project are required to read and understand this EAP.

- Training shall be administered when the employee is first hired, whenever the employee's responsibilities or designated actions under the plan change, and whenever the plan is changed. Plant personnel shall perform an Emergency Action Plan drill at least annually to provide an understanding of employees' duties in assisting in a safe and orderly evacuation, communication requirements, etc.
- Training records will be kept for the duration of employee employment plus one year. Training records will include training courses attended, trainer and dates completed.

NOTE: If any employee requires additional information about this plan or an explanation of their duties under this plan, please contact your supervisor or the EH&S Specialist.

APPENDIX F – RECORD OF REVIEWS AND REVISIONS

Date	Description	Reviewed By: