EMERGENCY RESPONSE ACTION PLAN
Tower Motor Company

Overview

The quantity and type of hazardous materials handled at the facility and the nature of our operations present a relatively low risk of a dangerous incident involving exposure to hazardous materials. Further, we rely upon community provided emergency services for primary emergency response should such an incident occur.

Nevertheless, there are certain emergency response activities that facility personnel may undertake. This is especially true in the event of a spill or other unplanned release of a hazardous material. Should, for example, a bulk oil storage tank fail, a significant release could occur and a prompt facility response may be required to prevent an environmentally damaging incident.

The facility can also respond in a very limited way to a fire. It is emphasized, however that the local fire department should be immediately called for anything except the most minor incident.

Questions on any element of this plan should be directed to Amy Larson, the Emergency Response Coordinator.

1. Emergency Equipment: Tower Motor Company relies primarily upon community provided services
for emergency response. Consequently, the variety and availability of on-site emergency equipment is limited. Response equipment typically present at the facility includes:

a. Spill Absorption Material: The facility usually has on hand a supply of absorbent material (grease-sweep) in the service areas. This material can be used to dam off the flow of a hazardous material. After any release is contained, this material can also be spread over the released liquid until it has been placed in sufficient volume to absorb it. The contaminated absorbent material should then be collected and placed in a drum or other containment for proper disposal.

b. Personal Protective Equipment: This equipment is limited to the following:

Equipment	Location
Safety Glasses	Service Dept.
Goggles	Service Dept.
Face Shields -- Welding	Service Dept.
Welding Helmet	Service Dept.
Dust Masks	Service Dept.
Nitrile Gloves	Service Dept.
Uniforms	Service Dept.
Shoes with Non-Slip Soles	Service Dept.
Safety Glasses	Body Shop / Paint Dept
Goggles	Body Shop / Paint Dept
Face Shields -- Welding	Body Shop / Paint Dept
Welding Helmet	Body Shop / Paint Dept
Respirators	Body Shop / Paint Dept
Dust Masks	Body Shop / Paint Dept
Leather Gloves	Body Shop / Paint Dept
Nitrile Gloves	Body Shop / Paint Dept
Shoes with Non-Slip Soles	Body Shop / Paint Dept

This equipment is available for use when routinely handling hazardous materials common to this facility. It can also be used under emergency conditions.

c. Hazardous Waste Hauler: Under certain conditions, hazardous waste haulers can be of great service during a release or threatened release of a hazardous material. For example, a hauler can empty a tank that appears to be failing. If a spill is contained, such a service may be able to pump up a substantial portion of the released liquid. Haulers who can be contacted include:

Waste Type	Waste Hauler
Used Oil Filters Hauler	ThermoFluids -- 1-800-350-7565
Used Fuel Filters Hauler	ThermoFluids -- 1-800-350-7565
Used Antifreeze Hauler	ThermoFluids -- 1-800-350-7565
Hazardous Waste Paint Hauler	ThermoFluids -- 1-800-350-7565
Hazardous Waste Hauler	ThermoFluids -- 1-800-350-7565
Used Battery Hauler	ASP Automotive Specialists -- 541 -485-1516

In the event the above haulers cannot be contacted, additional haulers can normally be located by searching online. Possible search terms include: "Waste Oil Hauler" and "Industrial Waste Disposal"

2. Spill Containment and Clean Up:

a. Identify the substance spilled

b. Consult the Safety Data Sheet (SDS) for clean-up instructions, proper personal protectiv equipment, and other considerations regarding the spilt substance

c. Shut off/eliminate all sources of ignition

d. Attempt to prevent any additional release (if possible). An example would be closing a leaking valve or turning off a pump that is causing a release.

e. Contain the spill by diking around it using sand, earth or other absorbent material. Ensure special attention to preventing spilled material from reaching a sewer or storm drain inlet.

f. Absorb spilled material using sand, earth or other absorbent. Floor cleaning/sweeping materials are appropriate and are normally available.

Note: It may be possible to pump up a significant portion of contained liquid.

g. Avoid skin contact and breathing vapors. Wear appropriate protective clothing and equipment. This equipment can include chemical resistant gloves, eye protection and supplied air respirators.

h. Ventilate the area with local exhaust systems or by opening available doors and windows.

Note: Avoid use of compressed air to speed evaporation of spilled liquid. This practice increases airborne concentrations and increases the possibility of injuries such as eye damage.

i. Dispose of contaminated absorbent in accordance with applicable regulations. This will normally involve disposal of the material as a hazardous waste. If the material is a corrosive, place contaminated absorbent material in polyethylene or polyethylene-lined container for disposal.

Note: If the material released is a corrosive (i.e., battery acid), it may be possible to neutralize it after it has been contained. For information on how to neutralize it, facility management should call the emergency numbers provided on the product Safety Data Sheet.

3. First Aid Procedures:

First aid information for an individual chemical is available on its Safety Data Sheet. It may also be appropriate to consult a physician. General first aid responses include:

a. **Eye Contact:** Flush with large amounts of water for at least 15 minutes. Occasionally lift upper and lower lids. Consult a physician.

b. **Skin Contact:** Remove contaminated clothing and immediately flush contaminated areas with large amounts of water.

c. **Inhalation:** If overcome or affected by vapors, remove from exposure and call a physician immediately.

d. **Ingestion:** Call emergency medical aid and/or poison control immediately. Consult the SDS to determine if additional steps should be taken.

4. Evacuation:

Supervisors have the authority to direct an evacuation of the facility. Refer to Part 3 of this Action Plan.

5. Reporting:

a. **Obligation to Report:** Depending upon the volume involved, the facility may be required to report a release or threatened release of a hazardous material. Consult state regulations to determine the reporting needs of this situation.

b. **Reporting Authority:** Any employee who detects a release or threatened release of a hazardous material (other than an incidental spill) should immediately notify his or her supervisor, who shall then be responsible for assessing and beginning a response to the hazard posed. If the release/threatened release involves a significant volume of hazardous material, the supervisor should promptly notify one of the following, who shall have reporting authority:

Reporting Authority
Service Manager
Customer Relations Manager
General Manager

If none of these parties can be notified, the supervisor has the authority to make the report.

c. **Reporting Procedure:** If uncertain as to whether a report is required, the responsible individual should first query one of the below listed agencies. If it is determined that a report is required, it should be made to the following:

Agency	Contact Information
911 Emergency Response	911
Local Fire Department	911
DEQ	800-844-8467
EPA National Response Center	800-424-8802

The report should be made as soon as possible so long as it does not impede immediate control of the release or interfere with emergency medical measures and should include the following about the release or threatened release:

- The exact location
- The name of the person that made the report
- The type and quantity of hazardous material(s) involved
- The potential hazard(s) presented (if known)
- Appropriate emergency response agencies and facility managers should also be notified.

d. Written Record: A written record of all verbal notifications should be prepared by the reporting individual and provided to the owner. This report may be handwritten and should include the following

- Date and time of call
- Person making call
- Agencies notified
- Individuals contacted
- Summary of conversation(s)

1. Fire Prevention:

The best means of managing a fire/explosion hazard at the facility is to prevent such an event. In that regard, facility management has prepared a Fire Prevention Plan that is included as Exhibit (a) to this Response Plan.

2. Reporting:

Any fire or explosion should be reported immediately to the local fire department or by dialing 911.

3. Fire Fighting Activities:

a. **Fire Department:** The facility will rely primarily upon the local fire department for response to a fire or explosion at the facility. The facility is not equipped, nor are personnel trained to respond to anything except the smallest fire. A fire in a trashcan or in a pile of rags could be an example of a small fire.

b. Facility Fire Fighting Activities

i. **Fire Fighting Equipment:** Facility equipment is limited to small, hand-held extinguishers. Properly used, these extinguishers can put out a small fire or control it until the fire department arrives. **Portable fire extinguishers are not designed to fight large or spreading fires**

These extinguishers carry notations that indicate which class of fire they can be used to fight. These notations consist of a series of numbers and letters (ex: 2A, 20BC) and are further explained as follows:

- **"A":** Effective against wood, paper and rubbish. Many fire extinguishers have a triangle surrounding the A. The triangle is the international symbol for an A type fire. The numbers in front of the A, in our example the number 2, means that the extinguisher has been rated as being capable of putting out an A type fire two square feet in area.
- **"B":** Effective against flammable and combustible liquids. The square that often surrounds the B is the international symbol for a liquid fire. The number in front of the B, in our example the number 20, is a relative term and means only that the extinguisher can handle a B fire 20 times larger than an extinguisher rated 1B.
- **"C":** Effective against electrical fires. The circle that may be around the letter is the international symbol for an electrical fire. There is no number rating system for the C designation on a fire extinguisher.
- **"D":** Effective against fires caused by flammable metals. These fire extinguishers are identified by five point star with the letter D inside of it.

Note: A 2A, 20BC extinguisher may therefore be used on any fire that might be anticipated at the facility. Of note, most of the portable fire extinguishers present at this facility are rated as"ABC" units. Further, a"BC" extinguisher may be effective on a Class A fire.

ii. **Precautions:** Before any effort is made to fight a fire, the individual(s) involved should make sure of the following:

- Everyone has left or is leaving the building.
- The fire department has been notified.
- The fire is confined to a small area and is not spreading beyond the immediate area.
- The individual using the extinguisher has an unobstructed escape route to which the fire will not spread.

- The individual using the extinguisher is trained in its proper use.

iii. **Use of a Portable Fire Extinguisher:** There are general guidelines that apply to the use of portable fire extinguishers. In general, an individual using an extinguisher should stand six to eight feet away from the fire and follow the four-step PASS procedure. If the fire does not go out immediately, the individual should leave the area at once. The PASS procedure is as follows:

- **Pull Pin:** This unlocks the operating lever on the extinguisher and allows discharge of the extinguisher. Some extinguishers may have other devices that prevent inadvertent operation.
- **Aim Low:** Point the extinguisher nozzle (or hose) at the base of the fire.
- **Squeeze:** Squeeze the lever below the handle. This discharges the extinguishing agent. Releasing the lever will stop the discharge. Some extinguishers have a button that can be pressed for release of the extinguishing agent.
- **Sweep From Side to Side:** Moving carefully toward the fire, keep the extinguisher aimed at the base of the fire and sweep back and forth across the fire until the flames appear to be out. Watch the fire area. If the fire reignites, repeat the process.

4. First Aid Procedures:

a. Smoke Inhalation: Remove the individual to fresh air immediately. Call a physician immediately. Report the situation to representatives of the Fire Department or other emergency response organizations on the scene.

b. Eye Irritation: Flush with large amounts of water for 15 minutes or until irritation subsides. Consult a physician.

c. Skin Contact (dermal): Remove contaminated clothing and wash skin thoroughly with soap and water. If material is a caustic, flush thoroughly with large amounts of fresh water.

d. Ingestion: Call emergency medical aid immediately. Consult the appropriate Safety Data Sheet (SDS) to determine if vomiting should be induced or if individual should be provided other first aid measures.

c. Burns: Remove the individual from the heat source and call a physician immediately. Report the situation to representatives of the Fire Department or other emergency response organizations on the scene.

5. Evacuation:

Supervisors have the authority to direct an evacuation of the facility. Refer to Part 3 of this Action Plan.

1. Potential Fire Hazards:

Facility management stores a number of products that are potential fire hazards. These products generally fall into one of the following categories:

a. Flammable liquids: May include gasoline, solvents and some paint related products.

b. Flammable gases: May include acetylene, hydrogen, methane or propane.

c. Combustible liquids: May include diesel fuel, lubricating oils and some solvents.

2. Proper Handling and Storage Procedures:

Flammable materials are to be used only in well- ventilated areas. This will prevent a buildup of vapors to a level that could pose a health or fire/explosion hazard. Containers of flammable and combustible materials should be closed when not in use. They should also not be stored near a heat or ignition source. Smoking is not permitted in any working area except those that are specifically labeled as a smoking area. Compressed gases are to be securely stowed at all times and, when not in use, valves are to be closed.

3. Responsibilities:

a. Supervisors are responsible for the overall safety of the work areas under their respective control.

b. Individual employees are responsible for keeping their work areas free of excessive debris and unwarranted accumulations of flammable and combustible materials.

c. Facility management is responsible for ensuring available on-site firefighting and fire suppression equipment is properly maintained and available for immediate use.

d. Supervisors are responsible for ensuring that significant spills of flammable and combustible liquids are contained and cleaned up according to facility guidelines.

4. Training:

Supervisors shall ensure that subordinate employees receive appropriate training on this Plan and on how to respond in the event of a fire emergency. In particular, this training shall include:

a.Fire/Explosion Response

b.Facility Evacuation Procedures

Evacuation Procedures
Tower Motor Company

Under certain circumstances, most likely a fire or gas detection, it may be necessary to evacuate the facility.

In the event a supervisor concludes that evacuation is required to protect the health and safety of subordinates, that supervisor has the authority to evacuate those serving under his direction. The supervisor shall, however, ensure that other appropriate personnel at the facility are notified of the decision to evacuate.

The key to a successful evacuation is accountability. Supervisors must be able to quickly account for assigned personnel and to report any who may be missing. With that in mind, evacuation procedures shall be as follows:

1. Order to evacuate is given by a Supervisor and/or an alarm.
2. Call 911 for emergency response support (fire dept., etc.).
3. If time allows, the following activities should be performed:
    i. Shut off all power to the facility or area being evacuated.
    ii. Close all doors, windows, vents, etc
4. **All employees shall promptly evacuate the facility by using the exit point most convenient to each. The primary evacuation assembly point shall be West End of Facility near Elrod Avenue. Should assembly at that point prove impossible, the secondary evacuation assembly point shall be Near Front Entrance of Parts Building.**
5. Notify adjacent businesses of the incident that necessitated the evacuation.

Following the evacuation, supervisors shall account for their personnel. In the event someone is determined to be missing, that fact shall be immediately reported to the senior facility manager present and to the responding emergency response organization (fire department, etc.).

Notes: (1) No one should reenter the facility in an effort to locate a missing individual. That is the task of the Fire Department or other emergency response organization. Individuals with these organizations are properly trained and equipped to undertake such a task.
(2) Personnel shall not leave the evacuation assembly point without the specific approval of their supervisor.

Supervisors shall render all possible assistance to fire department personnel and other emergency responders. This shall include providing information on the general location and nature of hazardous materials located in the facility.

First Aid Response:

This facility does not maintain a trained first aid responder. It is our policy that first aid response be provided by the local emergency medical response organization, which can be contacted by calling 911.

Flood:

Floods can be serious catastrophes and they are a very common hazard in the United States. Floods can be caused by a variety of factors, including a sudden accumulation of rain, rising rivers, tidal surges, ice jams and dam failures. The purpose of this program is to ensure the facility is prepared for any floods, by providing information and guidance about hazards that workers may face during and after a flood event. Having these plans in place prior to a flood occurring helps avoid confusion and prevents both injuries and property damage.

The facility possesses flood warning methods which help ensure employees are ready to evacuate in an orderly manner before rising waters impact the facility, or its evacuation routes. Facility management is responsible for monitoring for possible flooding conditions and have the authority to initiate evacuation procedures. Common monitoring methods include listening to weather radio or television stations for information about flood watches and warnings. If a supervisor receives information about the possibility of flooding, they will be prepared issue the order for employees to move to higher ground immediately. This order to evacuate should be made before water levels rise and potentially cut off evacuation routes. Part 4 of this Action Plan provides details on facility evacuation procedures. Common notices include

- **Flood Watch:** Flooding is possible. Monitor radio and television stations for more information.
- **Flash Flood Watch:** Flash flooding is possible. Be prepared to move to higher ground; monitor radio and television stations for more information.
- **Flood Warning:** Imminent threat - Flooding is occurring or will occur soon; if advised to evacuate, do so immediately.
- **Flash Flood Warning:** Imminent threat - A flash flood is occurring or will occur soon; seek higher ground on foot immediately.

There are many potential hazards when flooding has occurred. Some of the most common hazards associated with floods include electrical hazards, drowning, hypothermia from cold weather / water exposure, chemical and biological hazards, trees and debris, lifting injuries, and mold

Measures for minimizing potential hazards prior to a flood may include proper de-energization/shutoff of effected electrical sources, gas lines, and water lines. With regard to hazardous materials, the primary concern in a flood is the loss or displacement of these materials by floodwater. For example, water can run into an unsecured underground oil storage tank and, since water is heavier than oil, it will displace the oil. If floodwaters rise high enough, above ground tanks and drums could be similarly affected. When flooding is threatened, it is therefore important to ensure that all hazardous material containers are tightly closed or otherwise fastened shut. Further, steps should be taken to tie down or otherwise secure drums, etc. that might float free during a flood.
In the aftermath of a flood, workers may be involved in a variety of general response and recovery operations such as cleaning up minor damage to their worksite. However, operations with significant potential for injury, such as utility restoration, cleaning up spills of hazardous materials, and search and rescue, will only be conducted by community provided services and subcontractors.

Earthquake Response Plan
Tower Motor Company

The USGS has determined that your state is in the top 10 for frequency of earthquake events. An employee's best response in the event of an earthquake will vary by location. If there is any question as to the safety procedure for a specific area, employees are to seek guidance from their departmental manager. To aid in determining response procedures, the following guidance from OSHA's website (www.osha.gov) is provided for reference:

> "The primary dangers to workers result from: being struck by structural components or furnishings, inadequately secured stored materials, burns resulting from building fires resulting from gas leaks or electrical shorts, or exposure to chemicals released from stored or process chemicals. Many of the hazards to workers both during and following an earthquake are predictable and may be reduced through hazard identification, planning and mitigation.
>
> There are many things you can do to prepare your workplace before an earthquake occurs:
>
> - Pick "safe places". A safe place could be under a sturdy table or desk or against an interior wall away from windows and bookcases, vehicles, or tall furniture that could fall on you.
> - Practice drop, cover, and hold-on in each safe place. Drop under a sturdy desk or table and hold on to one leg of the table or desk. Protect your eyes by keeping your head down. Practice these actions so that they become an automatic response. Frequent practice will help reinforce safe behavior. When an earthquake or other disaster occurs, many people hesitate, trying to remember what they are supposed to do. Responding quickly and automatically may help protect you from injury.
> - Wait in your safe place until the shaking stops, then check to see if you are hurt. You will be better able to help others if you take care of yourself first, then check the people around you. Move carefully and watch out for things that have fallen or broken, creating hazards. Be ready for aftershocks.
> - Be on the lookout for fires. Fire is the most common earthquake-related hazard, due to broken gas lines, damaged electrical lines or appliances, and previously contained fires or sparks being released.
> - If you must leave a building after the shaking stops, use the stairs, not the elevator. Earthquakes can cause fire alarms and fire sprinklers to go off. You will not be certain whether there is a real threat of fire. As a precaution, use the stairs.
> - If you're outside in an earthquake, stay outside. Move away from buildings, trees, streetlights, and power lines. Crouch down and cover your head. Many injuries occur within 10 feet of the entrance to buildings. Bricks, roofing, and other materials can fall from buildings, injuring persons nearby. Trees, streetlights, and power lines may also fall, causing damage or injury."

a. Facility Evacuation: Part 4 of this Action Plan provides details on facility evacuation procedures.

b. Spill clean-up: When the facility is determined to be safe to enter, commence clean-up activities as outlined in Part 1 of this plan.

c. Additional requirements: CCR TITLE 19, SECTION 2731 (e) Identification of areas of the facility and mechanical or other systems that require immediate inspection or isolation because of their vulnerability to earthquake related ground motion.

INSPECTION

1. Compressed gases
2. Hazardous Material Tanks
3. Parts Shelves
4. Water heaters
5. Pressure vessels – Compressors
6. Any natural gas lines
7. Building / Equipment Damage
8. Domestic water lines: Check for leaks & shut off associated valves
9. Sprinkler systems: Check for leaks at the risers, lines and sprinklers. Control leaks but maintain as much fire protection service as possible.
10. Shut down electrical supplies, reactivate post inspection by competent person.

ISOLATION

Any unsafe area of the facility will not be repopulated until it is safe to enter.

Tornado Response Plan

Tower Motor Company

The threat of a tornado is real. Every year many tornadoes ravage the countryside and communities of the state. While avoiding property damage during a tornado is certainly difficult, there are several steps that can be taken to enhance personal safety. Some general guidelines for personal safety include:

1. **Seek Shelter:** Try to get inside. If you cannot get inside, crouch for protection beside a strong structure or lie flat in a ditch or low-lying area and cover your head and neck with your arms or a piece of clothing. Beware of water runoff.
   If inside, a good place to be during a tornado is in the basement of a building. If a basement is not available, try to move to a protected interior room on the lowest floor of the building, as far as possible from exterior walls and windows. Try to avoid large-span roof areas. Service shops may be an example. Try to use a piece of clothing or your arms to shield your head and neck.
2. **Driving:** A tornado can literally pick a car or truck up off the ground and throw it several hundred feet. If an individual in a vehicle finds himself immediately threatened by a tornado, he should normally stop, exit the vehicle and seek shelter immediately in a nearby building. In some instances, the best option may be to get out of the car and lie flat in a ditch or other low-lying area. This can offer some protection against flying debris and reduce the chance of being carried away by the tornado. Shield your head and neck and beware of water runoff.
3. **Accountability:** Tornadoes come and go in a matter of minutes, or even seconds. They typically displace not only objects, but people too. As soon as danger passes, it is important to account for everyone at the facility. It is easiest to account for everyone by assembling at the evacuation assembly area (see Part 3 of this plan). Once at the assembly area, don't leave until told to do so by your supervisor or other responsible facility manager.
4. **Hazardous Materials:** There is little that can be done to prevent the spilling or other release of these materials if a tornado hits the facility. However, as soon as the storm passes, every effort should be made to contain any release. Proper authorities may also have to be notified. Additional details on spill response activities are included in Section 1 of this action plan.
5. **Beware of Hazards:** Some steps to take following a tornado include:
   - Stay away from downed power lines. Report them immediately to the utility company.
   - Stay away from damaged buildings until cleared by a qualified inspector
   - Evacuate if gas or other dangerous fumes are detected. Notify appropriate authorities.
   - Avoid the use of candles (in many instances more people die from candle-related fires after a disaster than from the disaster itself.

EMPLOYEE TRAINING CERTIFICATION

I hereby acknowledge that I have received information on facility emergency response procedures so that I can be better prepared for certain facility emergencies, including a release or threatened release of a hazardous material. Specifically, I received information on the at least following:

- Spill/Release Response Plan (chemical handlers only)
- Fire/Explosion Response Plan, including use of hand-held fire extinguishers
- Evacuation Procedures
- Response plan for first aid and flood
- Tornado Response PlanEarthquake Response Plan

I understand that I should contact my supervisor should I have any questions or concerns about the information presented.

_____
Signature

_____
Print Name

_____
Date

cc: Employee File