



**KLEEN ENERGY SYSTEMS**

Middletown, CT

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# **Integrated Contingency Plan (ICP)**

**“One Plan” Including Emergency Response and Evaluation,  
Oil Spill Prevention Contingency and Countermeasures and  
Facility Response Plans**

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Prepared for:  
Kleen Energy Systems, Inc.  
1349 River Road  
Middletown, CT 06457

**August 2011**

**Revision 1**

Prepared by:



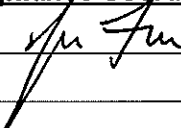
## PLAN REVISION SUMMARY SHEET

Note: Controlled document distribution is maintained by the **Compliance Coordinator**. Any other copy of this document must be marked as **"UNCONTROLLED – May Not be Current"**.

	<u>Responsible Party</u>	<u>Location</u>
1	Operations Supervisor-Primary ERC	Operations Supervisor's Office & travel case copy
2	Compliance Coordinator – Alt. ERC	Compliance Coordinator's Office
3	Plant Manager	Plant Manager's Office
4	Maintenance Supervisor	Maintenance Supervisor's Office
5	Control Room Operator	Control Room
6	Middletown South Fire District	445 Randolph Rd., Middletown, CT 06457
7	Aaron Godfrey – Clean Harbors (Primary Oil Spill Removal Organization (OSRO) Contractor)	Clean Harbors 761 Middle St, Bristol, CT, 06010 (860) 583-8917
8	Michael Barden – Moran Environmental Recovery (Secondary Oil Spill Removal Organization (OSRO) Contractor)	Moran Environmental Recovery 20 Commerce Road, Newtown, CT 06470 (203) 270-0095
9	EPA Regional Administrator	EPA Region 1 Offices

### Annual Review/Authorization/Certification

I have reviewed the ICP and relevant portions of the National Contingency Plan and Area Contingency Plan have found the FRP provisions current and accurate or I have made the appropriate administrative changes to personnel, response organization contacts, phone numbers, etc.; distributed them; and arranged or conducted update training of all affected staff. I understand that within 60 days of facility changes that may materially affect the response to a worst case discharge, I must submit the revised portions of the response plan to the Regional Administrator.

<u>Version/ Action</u>	<u>Compliance Coordinator Signature</u>	<u>Date</u>
Rev 1 Issued:		8/16/11
2012 Validation:	_____	_____
2013 Validation:	_____	_____
2014 Validation:	_____	_____
2015 Validation:	_____	_____

### ICP Change Log

Rev. #	Compliance Coord. Signature	Date	Summary of Change
1		8/11	Address FD/Siting Commission Comments (pages Cover, i, I-2; II-2, 3, 6, 9, 10, 11, 12, 14, 16, 21, 22, 25, 26, 30, 32; III-Annex 3-3, 4, 8, 9, 10, 20, 34, 37, 38; III-Annex 5-11; III-Annex 11-2; III-Annex 15-1, 2, 3, 4, 15)

# I-PLAN INTRODUCTION ELEMENTS

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In addition, this ICP satisfies the Spill Prevention and Control Plan requirements for wastewater discharge permits in Connecticut.

This ICP does not integrate all OSHA “Hazwoper” (29 CFR 1910.120) requirements because the facility relies on local and county agencies and contractors for hazardous materials emergency response. As a result, the ICP uses the term **Emergency Response Coordinator (ERC)** to indicate the persons who will coordinate assessment and incipient response activities of potential emergency incidents by site personnel and determine if it is an emergency requiring outside Oil Spill Response Organization (OSRO) contractor or City of Middletown/ Middlesex County emergency response agency support. The Primary and Alternate ERCs are trained as an oil spill response **Qualified Individual**, and all employees are trained on this ICP. The Control Room Operator serves as Acting ERC until the Primary or Alternate ERC reaches the facility. The ERC will transfer incident command to the outside response organization Incident Commander (IC) that has jurisdiction (see Annex 3) and continue to serve to coordinate facility and company support of the responders in an emergency. Facility personnel ICP training integrates Hazwoper awareness, Incident Command System awareness, and recognizing the limits of an employee’s ability to respond in an immediately dangerous to life and health situation.

## I.2. Table of Contents

Refer to the Table of Contents for this document (page iii). Contents generally include:

**Tab II – Core Plan** contains essential information for immediate response to an emergency incident and is organized as follows:

Critical Emergency Notification Phone Lists and Forms

1. Discovery
2. Initial Response
3. Incident Specific Response Guidelines
  - a. Petroleum/Chemical Spill or Release
  - b. Fire/Explosion/Severe Weather/Bomb Threat/Workplace Violence
  - c. Medical Emergency
  - d. Evacuation Plan
4. Sustained Actions

## II - EMERG. RESPONSE ACTION PLAN (ERAP)/CORE PLAN

### Emergency Notification Phone List

Last Updated 03/25/11

<b>Qualified Individual/Emergency Response Coordinator Information</b>			
	<b>Plant</b>	<b>Home</b>	<b>Cell</b>
Gordon Tuttle, Operations Supervisor, Qualified Individual, Primary ERC	860-704-2512 1349 River Road Middletown, CT 06457	See cell [REDACTED]	[REDACTED]
Jason Farren, Compliance Coordinator, Qualified Individual, Alternate ERC	860-704-2515 1349 River Road Middletown, CT 06457	See cell [REDACTED]	[REDACTED]

<b>Plant Response Support Contacts</b>			
<b>Senior Staff</b>	<b>Plant</b>	<b>Home</b>	<b>Cell</b>
Gordon Holk, General Manager	860-704-2509	[REDACTED]	[REDACTED]
Robert Haley, Plant Manager	860-704-2511	[REDACTED]	[REDACTED]
Kevin Caldwell, Plant Engineer	860-704-2517	[REDACTED]	[REDACTED]
Drew Schneider, Maintenance Supervisor	860-704-2513	[REDACTED]	[REDACTED]
Plant Control Room (Acting ERC off shift)	860-704-2520	NA	NA

<b>Oil Spill Removal Organization (OSRO Contractor)</b>	
Clean Harbors (Primary)	800-645-8265
Moran Environmental (Secondary)	888-233-5338

<b>Government Agencies and Other Affected Entities</b>		
	<b>Day</b>	<b>After Hours</b>
NRG Facility (if oil reaches river, Note 1)	Shift Supervisor 860-346-9639	Shift Supervisor 860-346-9639
National Response Center	24 Hour Spill Reporting Hotline 1 (800) 424-8802	24 Hour Spill Reporting Hotline 1 (800) 424-8802
EPA Region I	(800) 424-8802	(800) 424-8802
CT Dept. of Env. Protection	860-424-3338	860-424-3338
Local Response Agencies (Fire, Hazmat, Ambulance, Police)	911 Middletown South Fire District 445 Randolph Rd., Middletown, CT 06457 Phone: 860-347-6661	911
Downstream Water Supply <sup>†</sup> (if oil reaches river, Note 2)	Pratt & Whitney – 24 hr. Emerg. 860-344-5111	Pratt & Whitney – 24 hr. Emerg. 860-344-5111
CT Dept. of Public Health	Incident Commander and Chief of Staff - Warren Wollschlager 860-509-7101	General Information, After Hours, Emergencies (860) 509-8000

**Notes:**

1. If petroleum reaches the river, immediately call NRG so they can protect their water intakes, and possibly block oil flow by booming across the point of entry or the river using on-site boat and boom.
2. If petroleum reaches the river and is not blocked at NRG, it may reach Pratt & Whitney within a couple of hours. Call them so they can boom to protect their intakes.

<sup>†</sup> There are no known potable water wells downgradient between the facility and river. There are no known potable water river intakes. Known non-potable water intakes listed.

## II - EMERG. RESPONSE ACTION PLAN (ERAP)/CORE PLAN

<b>Other Contacts</b>	
U.S. Coast Guard	Sector Long Island Command Center – 203-468-4444 120 Woodward Avenue, New Haven, CT 06512
Buckeye Pipeline	Report an emergency or suspected pipeline problem to: Buckeye Partners, L.P. - 1-800-331-4115
Algonquin Pipeline	Spectra Energy Emergency Number - 800-726-8383
Fire Marshall	South District - Steve Krol 860-347-6661 x102 deputychief@southfiredistrict.com
Local Emergency Planning Committee (LEPC)	William A. Austin Capitol Region Emergency Planning Committee Chairman/Fire Chief 860-561-8300
State Emergency Response Commission (SERC)	Through CT DEP 860-424-3338
State Police	State of Connecticut Department of Public Safety 1111 Country Club Rd. Middletown, CT 06457 860-685-8190 1-800-842-0200
FBI (Sabotage & Terrorism)	Boston, MA 617-742-5533
Weather Report	<a href="http://www.weather.com">www.weather.com</a> <a href="http://www.weatherunderground.com">www.weatherunderground.com</a> <a href="http://www.nws.noaa.gov/">http://www.nws.noaa.gov/</a>
Kleen Energy Community Alert System (Local Officials and Residents)	<a href="http://www.kleenenergyct.com">www.kleenenergyct.com</a> Email / text message automated distribution list maintained by the Kleen Energy Public Information Officer
Local Television/Radio Station for Evacuation Notification	WTNH Channel 8 ABC Affiliate 203-784-8888 – New Haven WPLR 99.1 FM 203-783-8331 <a href="http://www.wplr.com/">http://www.wplr.com/</a> WYBC 94.3 FM 203-432-8145 WELI 960 AM 203-281-9600 <a href="http://www.weli.com/">http://www.weli.com/</a>
Hospitals	860-358-6000 Middlesex Hospital 28 Crescent St Middletown, CT 06457-3650 <a href="http://www.midhosp.org">www.midhosp.org</a>

## II - EMERG. RESPONSE ACTION PLAN (ERAP)/CORE PLAN

### Emergency Notification Documentation

This form may be used to document communications with emergency contacts.

Last Updated 2/19/10

Name	Phone	Date/Time	Person Contacted	Notes/Comments (if any):
Qualified Individual	See Section Emergency Notification Phone List in Section II.	/		
OSRO (Oil Spill Removal Organization) - Clean Harbors (or Moran)	800-645-8265  (if Clean Harbors unavailable, call Moran 888-233-5338)	/		
NRG Facility (Intakes and Onsite Boom for immediate deployment)	Shift Supervisor 860-346-9639	/		
National Response Center	24 Hour Spill Reporting Hotline 1 (800) 424-8802	/		
EPA Region I	(800) 424-8802	/		
CT Dept. of Environmental Protection	860-424-3338	/		
Local Response Agencies (Fire, Hazmat, Ambulance, Police)	911 Middletown South Fire District Edward Badamo – Fire Chief 445 Randolph Road, Middletown, CT 06457 Phone: 860-347-6661	/		

## II - EMERG. RESPONSE ACTION PLAN (ERAP)/CORE PLAN

### Emergency Action Levels

The **ERC** will classify incidents to help guide staff on what notification actions are needed based on the type and seriousness of the incident, whether off-site responders are needed and whether there may be off-site effects or concerns. Minor deviations during normal operation need not be classified. If severity/conditions change, the ERC will reassess and reclassify the incident and adjust notifications if appropriate. Emergency levels are defined as follows:

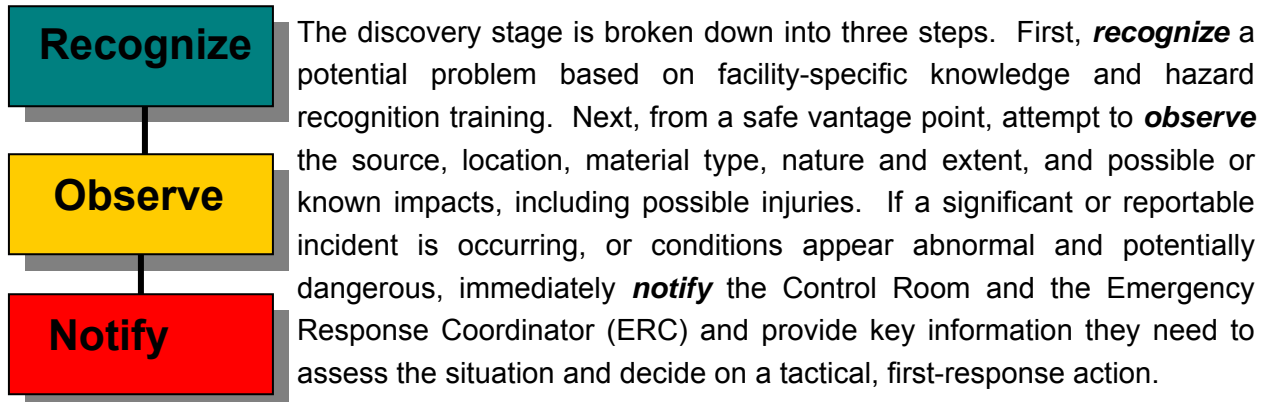
Classification	Description	Examples	Who Notified
NOTIFICATION OF UNUSUAL EVENT	Non-emergency conditions that may be apparent to the community where notification can allay potential concerns.	Noise generating major events, major construction activities.	Community and local officials, after consultation with KLES/NAES management
SITE ALERT	Effects likely limited to local plant safety, env. or security threat that, if promptly addressed, will NOT likely risk staff life threat, major env. damage, or major equipment damage.	Localized fire can be extinguished with portable extinguishers, small spills contained on impervious surfaces that can be cleaned up by properly trained site personnel.	Staff and, for localized fires, the Fire Department.
LOCALIZED EMERGENCY	Safety/env./security event with threat to site personnel, on-site environmental impacts or major damage to site equipment either currently or likely without off-site emergency response. No likely off-site effects.	Larger fires requiring offsite FD response; larger releases not contained in dikes / impervious surfaces that require outside support (e.g. OSRO or FD Hazmat) but do not have imminent offsite impacts.	Off-site emergency responders or OSRO  and  (when reportable releases) to agencies.
PLANT-WIDE EMERGENCY	Safety/env./security event with probable life threat to site personnel, catastrophic damage to site equipment, or potential off-site effects on the public or the environment.	Major fire / explosion (e.g., fuel tank fires or natural gas explosions, worst case fuel spill, major chemical release (e.g. aqueous ammonia spills w/vapor leaving site) that require coordinated response and community notification.	Off-site emergency responders or OSRO, (when reportable releases) to agencies and Community and local officials notifications.

## II - EMERG. RESPONSE ACTION PLAN (ERAP)/CORE PLAN

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### II.1. Discovery

Prompt recognition and appropriate action upon **discovery** can help mitigate the effects of any spill, release, or emergency incident. The discovery process summarized here is reinforced in ICP and other training (e.g., operator training, hazard communication training).



**NOTE:** This guidance is for situations that are not clearly recognized as Immediately Dangerous to Life and Health (IDLH). **IF YOU OBSERVE AN IDLH SITUATION, IMMEDIATELY GET YOURSELF AND OTHERS AROUND YOU TO A SAFE LOCATION AND NOTIFY THE CONTROL ROOM TO EVACUATE THE AREA.**

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**Recognize** *Recognize* a problem or potential hazard based on the uses, properties and behavior of equipment and chemicals (e.g., visible appearance, sound, odor, vibration, temperature, automated sensor reading, alarm).

Signs of common hazards or emergencies and initial precautions include:

- **Flammable Gas Release without Ignition** (e.g., hydrogen) – Can be evident by visible damage to equipment, sound, condensation or frost on surfaces. High hazard of ignition and explosion, so immediately clear the area to a safe distance.
- **Fire** – Can be evident by visible flame, smoke, heat, and/or charring of surfaces. If a flammable gas or vapor is the cause, or if there is a risk of the fire being extinguished while there is a continuing gas release, there may be a high hazard of explosion or rapid spread of the fire. Immediately clear the area to a safe distance, unless the fire is incipient and controllable and one is trained in firefighting.
- **Gasoline or Other Highly Ignitable Fluid Release** – Can be evident by visible liquid, damage to equipment, and characteristic smell of gasoline vapors. Dense vapors stay near the ground and can easily be explosively ignited. Clear the area if the release is large, uncontrolled, and/or there is a potential ignition source.
- **Non-Flammable Gas Release** – Can be evident by visible damage to equipment, sound, condensation or frost on surfaces. Risk of asphyxiation due to oxygen



## II - EMERG. RESPONSE ACTION PLAN (ERAP)/CORE PLAN

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displacement. Clear the area if release appears large and uncontrolled, especially if in a building or confined space.

- **Toxic Gas or Vapor Release** (e.g., ammonia, acids or caustics) – Can be evident due to equipment damage, visible vapor cloud, odor, or acute pain in breathing, the eyes, and the skin. Clear the area to a safe distance.
- **Injury / Illness** (including confined space) – Observe signs of common injuries and illnesses (e.g., from training on First Aid, Hazcom, etc.). If a person is down or injured, check if the cause remains and there is risk to others. **Do not enter a confined space** to help – this is a job only for trained rescuers. Without proper precautions, equipment and training, a rescuer may become the next victim.
- **Life Endangering Equipment Failure** (e.g., high pressure steam; mechanical failure) – High pressure steam may be detectable as a high pitched sound but can be invisible. Stand clear of any failed equipment to observe the situation.
- **Oil or Other Organic Liquids Spill or Release** – Visible as clear to dark colored fluids, some that flow freely and others that are viscous, can have a noticeable odor. Can be hazardous, but less severe acute risks are usually associated with these materials. Observe from a closer, but safe range.

### Observe

*Quickly*, and *only from a safe place*, observe the situation, making note of the following:

- **Location** of the problem and its source;
- **Identity** of the known or likely material involved if it is a release;
- **Extent** of the problem (Incidental or Uncontrolled);
- **Fire or explosion risk**;
- **Injuries** to personnel and their severity; and
- **Risks** to personnel or responders (e.g., damaged equipment, mechanical hazards, gases or vapors).

### Notify

*FIRST, Immediately notify* personnel in the area within hearing distance who may be in danger or who may be trained to assist. Attempt to do this without slowing notification of the **Control Room Operator**, who becomes the acting **Emergency Response Coordinator (ERC)** until the Primary or Alternate **ERC** arrives.

## II - EMERG. RESPONSE ACTION PLAN (ERAP)/CORE PLAN

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**SECOND**, *immediately notify* the **Control Room Operator** via radio or plant phone, providing the following information:

- **Your name;**
- **Your observations** of the situation (**Location, Identity, Extent, Fire/Explosion, Injuries, Risks**).

Upon notification of the incident by the Incident Discoverer, the **Control Room Operator** will assume the role and responsibilities of the **ERC** until the Primary or Alternate **ERC** is notified, arrives and takes Incident Command. The **ERC** will draw upon knowledge of plant operations, specific training courses (i.e., operator training, hazardous materials training), and this manual to respond to a particular emergency.

**THIRD**, *prepare to act* as the first responder if properly trained, if instructed to do so by the **ERC** and if response will not endanger life or health (as described in the next section).

**FOURTH**, if not properly trained to respond or it is an immediately dangerous to life and health situation; *prepare to remain* at the scene at a safe distance to meet emergency responders to direct them to the emergency, but *only if instructed* to do so by the **ERC**.

## II - EMERG. RESPONSE ACTION PLAN (ERAP)/CORE PLAN

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Internal evacuation notifications for plant personnel will be through the plant alarm system and plant radios. The evacuation alarm consists of a loud, distinctive audio alarm activated by the Control Room Operator and played through the plant Gai-tronics (PA) system. The fire alarm system may sound automatically in response to a fire or any . In either case, sounding of the alarm requires evacuation of either the entire facility or portions of the facility so it will be followed by a PA announcement giving instructions on partial or complete evacuation, evacuation routes and assembly areas based on the specific incident. Evacuation procedures are given in the Evacuation Plan (**GREEN TAB**).

### II.2.b. Establishment of a Response Management System

The response management system for Kleen Energy is provided in the following organization chart (Response Management System). The system specifies emergency responsibilities at the facility. The list is updated when information changes. All facility O&M personnel are trained in the **ERC**/Qualified Individual notification procedures and to take incipient mitigation measures if they can safely do so without endangering themselves (e.g., closing valves, shutting equipment, applying sorbent/blocking measures for small and incipient spills, fire extinguisher for small incipient fires).

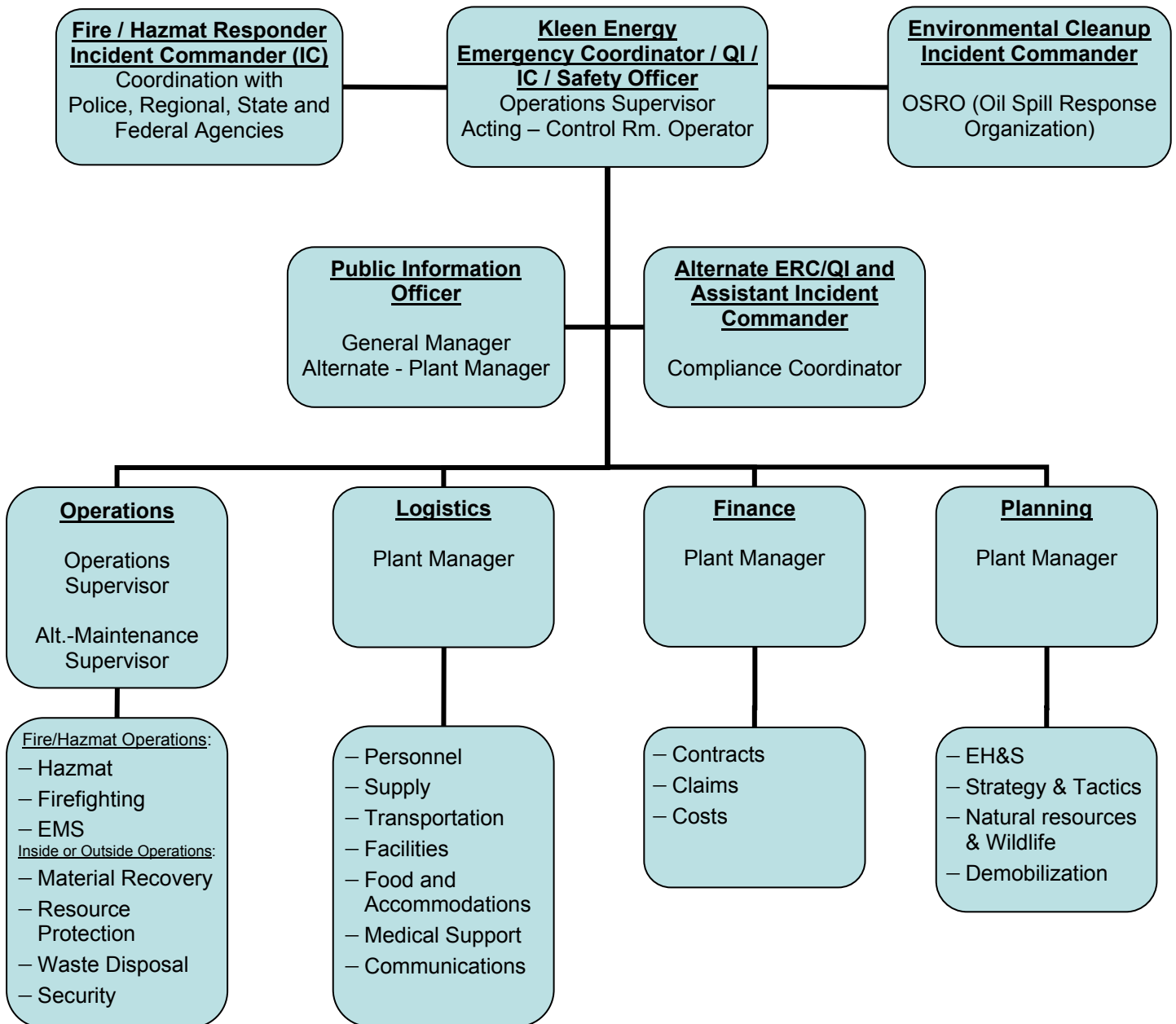
A detailed description of responsibilities and duties is provided in Annex 3, Section III.3.b of this ICP. This involves the development of an incident/emergency response organization and action plan to address small and large spill/release incidents and non-spill emergencies at this facility. Implementation of the Response Management System/Incident Command System (ICS) is initiated in Step 1 of each incident-specific response guideline.

Emergency response for fire, explosion, highly hazardous material releases or medical emergencies will be conducted by outside response agencies. Environmental cleanup of significant spills will be conducted by the OSRO contractor, with input from outside response agencies as appropriate. Agreements with the OSRO contractor are included as **Annex 13** so that the availability of resources can be verified.

The **ERC** will coordinate response to the incident unless it is a medical or hazardous substance emergency or environmental cleanup requiring outside response organizations. In that case, the **ERC** transfers incident command to the outside

## II - EMERG. RESPONSE ACTION PLAN (ERAP)/CORE PLAN

### Response Management System



## II - EMERG. RESPONSE ACTION PLAN (ERAP)/CORE PLAN

### II.2.g - Incident-Specific Emergency Response Guidelines

## PETROLEUM OR CHEMICAL RELEASE

### DISCOVERY, NOTIFICATION, PRELIMINARY ASSESSMENT

Event	Responsibility	Action
Upon <b>detecting</b> a spill or release	All Employees	<ol style="list-style-type: none"> <li>1. <b>NOTIFY</b> the <b>Control Room Operator</b> using plant two-way radios or Gai-tronics (PA) system or by dialing the cell phone listed in the EMERGENCY NOTIFICATION PHONE LIST on page II-2 and provide the location and nature of the release. This notification must be done regardless of the size of the discharge.</li> <li>2. If possible <u>without endangering yourself</u>, <b>STOP</b> the product flow by securing pumps, closing valves, etc. <ul style="list-style-type: none"> <li>– <b>DO NOT WALK INTO OR TOUCH ANY SPILLED MATERIAL.</b></li> <li>– <b>DO NOT ENTER ANY SPACE OR PERFORM ANY ACTIONS THAT MAY CONTAIN IDLH ATMOSPHERES UNLESS IT CAN BE SAFELY ASSESSED AND IS FOUND TO BE NON-IDLH.</b></li> </ul> </li> <li>3. <b>SHUTOFF</b> ignition sources (e.g. motors, electrical circuits, open flames, etc.) around flammable gas or flammable/combustible liquid releases, if safe to do so.</li> <li>4. <b>INITIATE</b> containment activities to stop the flow and spread of the release, if safe to do so. If outside secondary containment, as applicable: <ul style="list-style-type: none"> <li>– Use absorbent material to prevent spread / absorb spill</li> <li>– Place drain-blocker mat over nearby/downhill storm drains</li> <li>– Place absorbent boom/material across drainage flow paths (e.g., in catch basin)</li> <li>– Place 25'x10" deep booms at downstream end of storm basins</li> </ul> </li> <li>5. <b>ATTEND</b> to injured personnel; if safe to do so (see First Aid in MSDS).</li> <li>6. <b>EVACUATE</b> surrounding area, as necessary, and remain upwind.</li> <li>7. <b>BARRICADE</b> area from safe distance and deny entry, as necessary.</li> </ol>
Upon <b>receiving notification</b> of a spill or release	Emergency Response Coordinator ( <b>ERC</b> ) (Qualified Individual)	<ol style="list-style-type: none"> <li>8. <b>ASSESS</b> (from reports, video or visuals at a distance) if immediate EVACUATION and/or offsite EMERGENCY RESPONSE assistance is needed (SEE MATERIAL-SPECIFIC RESPONSE GUIDES). NOTE: The SPILL RESPONSE NOTIFICATION FORM can be used to gather and document the status of the incident.</li> <li>9. If necessary, <b>ACTIVATE</b> Emergency Response Action Plan and make notifications of additional response resources needed (see below).  REFER to the MATERIAL-SPECIFIC RESPONSE GUIDANCE following this page.</li> </ol>
<b>FULLY CONTAINED</b> Release (Impervious containment, no significant vapor threat)	<b>ERC</b> or Designee	<ol style="list-style-type: none"> <li>10. <b>NOTIFY:</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> Oil Spill Removal Organization (OSRO Contractor) - Clean Harbors (800-645-8265) (&lt;1.5 hr response) or, if unavailable, Moran (888-233-5338)</li> </ul> </li> </ol> <p>NOTE: Spills to on-site treatment or impervious containment may not be reportable.</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> The National Response Center (1-800-424-8802) immediately if RQ is reached.</li> <li><input type="checkbox"/> Connecticut Dept. of Environmental Protection (CT DEP) 860-424-3338</li> </ul>

## II - EMERG. RESPONSE ACTION PLAN (ERAP)/CORE PLAN

### II.2.g - Incident-Specific Emergency Response Guidelines

#### PETROLEUM OR CHEMICAL RELEASE

Event	Responsibility	Action
Spill or Release to <b>WATER</b>	<b>ERC</b> or Designee	<p>11. <b>NOTIFY:</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Oil Spill Removal Organization (OSRO Contractor) - Clean Harbors (800-645-8265) (1.5 hr response) or, if unavailable, Moran (888-233-5338)</li> <li><input type="checkbox"/> NRG Facility (Intakes and Onsite Boom for immediate deployment) Shift Supervisor 860-346-9639</li> <li><input type="checkbox"/> The National Response Center (1-800-424-8802) immediately if RQ.</li> <li><input type="checkbox"/> Connecticut Dept. of Environmental Protection (CT DEP) 860-424-3338</li> <li><input type="checkbox"/> United States Environmental Protection Agency (215-814-9016)</li> <li><input type="checkbox"/> Pratt &amp; Whitney– 24 hr. Emergency 860-344-5111</li> </ul> <p>NOTE: Spills to on-site treatment or impervious containment may not be reportable.</p>
Spill or Release to <b>SOIL</b>	<b>ERC</b> or Designee	<p>12. <b>NOTIFY:</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> If Outside Response is Required: OSRO Contractor - Clean Harbors (800-645-8265) (&lt;1.5 hr response) or, if unavailable, Moran (888-233-5338)</li> <li><input type="checkbox"/> The National Response Center (1-800-424-8802) immediately if RQ.</li> <li><input type="checkbox"/> Connecticut Dept. of Environmental Protection (CT DEP) 860-424-3338</li> </ul>
<b>Hazmat Emergency</b> Due to Potential Vapor Exposure or Ignition	<b>ERC</b> or Designee	<p>13. <b>NOTIFY:</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> 911 if Hazmat needed (e.g., ammonia vapor) or Fire Department needed for potential fire/explosion hazard on-site or on roadways.</li> <li><input type="checkbox"/> Connecticut Dept. of Environmental Protection (CT DEP) 860-424-3338</li> </ul>
Spill or Release necessitating <b>EVACUATION</b>	<b>ERC</b> or Designee	<p>14. Uses the plant GAI-Tronics system to announce, "<b>The facility is being evacuated in response to an oil spill, please evacuate in a calm and orderly fashion to the ...</b>" Announcement must be repeated 3 times slowly and clearly. Safest evacuation site will be determined by <b>ERC</b> based on details of the spill (i.e., type of materials involved, location of incident, etc.).</p>
If instructed to <b>EVACUATE</b>	All Plant Employees	15. <b>EVACUATE</b> facility according to Evacuation Plan and ERC instructions.
After evacuating the facility		16. <b>ASSEMBLE</b> in area(s) noted by ERC.
After evacuating to proper assembly point	Shift Supervisors	17. Determine employee <b>HEAD COUNT</b> .
		18. <b>REPORT</b> results to ERC or designee.
After receiving head count	<b>ERC</b> or Designee	19. If an employee(s) is missing, attempt to locate employee at evacuation locations. Otherwise, work with outside emergency responders to initiate a rescue.

## II - EMERG. RESPONSE ACTION PLAN (ERAP)/CORE PLAN

### II.2.g - Incident-Specific Emergency Response Guidelines

#### FIRE

Event	Responsibility	Action
Detecting a fire or explosion	All Employees	1. <b>NOTIFY</b> Control Room Operator using plant two-way radios or Gai-tronics (PA) system or by dialing cell phone listed in EMERGENCY NOTIFICATION PHONE LIST on page II-2 and provide location and nature of the fire (notify regardless of the fire size or if extinguished).
		2. If trained in portable extinguisher use, <b>RESPOND</b> to a small / incipient fire by using portable fire extinguisher to extinguish. BE CAUTIOUS of BLEVE RISK from leaking, hot, confined or adjacent flammable or combustible gases or liquids. If not trained, unable to respond, it is a larger fire, or if assistance is needed proceed immediately to Step 2 below.
Receiving Notification of a fire or explosion	Emergency Response Coordinator ( <b>ERC</b> )	3. <b>ASSESS</b> (from reports, video or visuals at a distance) if a controllable incipient fire or if immediate SHUTDOWN, EVACUATION and/or offsite EMERGENCY RESPONSE is needed. 4. <b>NOTIFY</b> 911 for Fire Department assistance (advise them if it is an incipient fire that has been extinguished or an active fire).
Fire Beyond Incipient Stage or explosion	Emergency Response Coordinator ( <b>ERC</b> )	<b>IF NECESSARY:</b> 5. Order <b>SHUTDOWN</b> of affected plant area or entire plant, including all Natural Gas and Fuel Oil main shutoff valves. 6. <b>ACTIVATE</b> Emergency Response Action Plan. 7. <b>EVACUATE</b> by sounding the Gai-tronics emergency evacuation alarm (if automated fire alarm not already activated). Announce either local area ( <u>if source is known to be limited</u> ) or entire plant evacuation by Gai-tronics PA.
	Middletown South Fire District	8. <b>RESPOND</b> to location communicated by site personnel posted at the gate to control and extinguish the fire.
Evacuation announcement or alarm	Evacuation Aides	9. <b>ASSISTS</b> with evacuation of any employees requiring assistance.
	All Plant Employees	10. Immediately <b>EVACUATE</b> facility/building via closest & safest exit. See Evacuation Plan ( <b>GREEN TAB</b> ) 11. <b>ASSEMBLE</b> for a head count in primary emergency assembly area or alternate assembly point determined by <b>ERC</b> . See Evacuation Plan ( <b>GREEN TAB</b> )
After Assembly	Maintenance Superv. (or Plant Eng.) and Contractor Supervisors	12. <b>HEAD COUNT</b> vs. employees on duty & Visitor/Contractors log. 13. <b>TRY TO LOCATE</b> missing at other assembly areas by phone, etc. 14. <b>REPORT</b> those believed missing to <b>ERC</b> or designee.
After Head Count	<b>ERC</b>	15. Immediately <b>REPORT MISSING</b> to outside emergency responders to alert them to the need to initiate a rescue.
No employee shall be disciplined if it is in their best judgment that a facility evacuation and/or outside services are needed to protect the safety of all KLES employees and the facility.		

# II - EMERG. RESPONSE ACTION PLAN (ERAP)/CORE PLAN

## II.2.g - Incident-Specific Emergency Response Guidelines

### EXPLOSION

Event	Responsibility	Action
<b>Major Explosion</b>	All Employees	1. ANY EMPLOYEE aware of a MAJOR EXPLOSION is authorized to immediately initiate Emergency <b>SHUTDOWN</b> and <b>EVACUATION</b> and <b>NOTIFY 911</b> if delays in notifying the ERC may endanger life and health.
<b>Local Small Flash or Limited "Pop"</b>	All Employees	<p><u>ONLY</u> attempt the following mitigation if you are certain it is a local small flash fire or limited "pop" with little or <u>no potential to endanger yourself</u>:</p> <p>2. <b>NOTIFY</b> the <b>Control Room Operator</b> using plant two-way radios or Gai-tronics (PA) system or by dialing the cell phone listed in the EMERGENCY NOTIFICATION PHONE LIST on page II-2 and provide the location and nature of the event regardless of size.</p> <p>3. If possible <u>without endangering yourself</u>, <b>STOP</b> flammable gas or liquid flow by securing pumps, closing valves, etc. <u>away from the source</u>.</p> <ul style="list-style-type: none"> <li><b>DO NOT ENTER ANY SPACE OR PERFORM ANY ACTIONS THAT MAY CONTAIN LEL OR OXYGEN DEFICIENT ATMOSPHERES UNLESS IT CAN BE SAFELY ASSESSED WITH A CGI AND FOUND TO BE NON-IDLH.</b></li> </ul> <p>4. <b>SHUTOFF</b> ignition sources (e.g. motors, electrical circuits, open flames, etc.) around flammable gas or flammable/combustible liquid releases, if safe to do so.</p> <p>5. <b>AVOID</b> containment actions that can enclose materials in a pipe or vessel and lead to overpressure failure and BLEVE due to heating.</p> <p>6. <b>ATTEND</b> to injured personnel, if safe to do so.</p> <p>7. <b>EVACUATE</b> surrounding area, as necessary.</p> <p>8. <b>BARRICADE</b> area from safe distance and deny entry, as necessary.</p>
<b>Receiving Notification</b>	Emergency Response Coordinator ( <b>ERC</b> )	9. <b>ASSESS</b> (from reports, video or visuals at a distance) & determine if a limited small flash or local pop warranting above action or if immediate SHUTDOWN, EVACUATION and/or offsite EMERGENCY RESPONSE is needed. If insufficient information, err on the side of caution.
<b>Explosion Actions</b>	Emergency Response Coordinator ( <b>ERC</b> )	<p><b>IF NECESSARY:</b></p> <p>10. Order <b>SHUTDOWN</b> of affected plant area or entire plant, including all Natural Gas and Fuel Oil main shutoff valves.</p> <p>11. <b>ACTIVATE</b> Emergency Response Action Plan.</p> <p>12. <b>EVACUATE</b> by sounding the Gai-tronics emergency evacuation alarm (if automated fire alarm not already activated). Announce either local area (<u>if source is known to be limited</u>) or entire plant evacuation by Gai-tronics PA.</p> <p>13. <b>NOTIFY</b> 911 for Fire Department assistance.</p>
	Middletown South Fire District	14. <b>RESPOND</b> based on debrief of specific event as communicated by 911 call and/or site personnel posted at the gate.
<b>Evacuation announcement or alarm</b>	Evacuation Aide	15. <b>ASSIST</b> with evacuation of any employees requiring assistance.
	All Plant Employees	16. Immediately <b>EVACUATE</b> facility/building via closest & safest exit. See Evacuation Plan ( <b>GREEN TAB</b> )



## II - EMERG. RESPONSE ACTION PLAN (ERAP)/CORE PLAN

### II.2.g - Incident-Specific Emergency Response Guidelines

#### SEVERE WEATHER

Event	Responsibility	Action
Upon notification of a <b>Severe Weather Watch or Warning</b>	Emergency Response Coordinator (ERC)	1. <b>COORDINATE</b> with Plant Manager to determine if facility shutdown is required.
		2. If required, <b>INITIATE SHUTDOWN</b> by contacting <b>Control Room Operator</b> .
		3. <b>EVACUATE</b> facility, if warranted based on the type and severity of anticipated disaster event.
		4. <u>If unable to evacuate</u> , determine a safe place within facility and <b>NOTIFY ALL EMPLOYEES RELOCATE TO A SAFE LOCATION</b> inside the facility.  NOTE: <ul style="list-style-type: none"> <li>• An evacuation or relocation notice must be given over the Gai-tronics (PA) system.</li> <li>• For Severe Weather - Move away from perimeter and exterior offices and all exterior glass</li> </ul>
Upon notification of <b>Evacuation or Relocation Orders</b>	Evacuation Aide	5. <b>ASSIST</b> with evacuation of any employees requiring assistance.
	All Employees	6. Comply with announcement and either <b>EVACUATE OR RELOCATE</b> as soon as possible.  See Evacuation Plan ( <b>GREEN TAB</b> )

## II - EMERG. RESPONSE ACTION PLAN (ERAP)/CORE PLAN

### II.2.g - Incident-Specific Emergency Response Guidelines

## EVACUATION PLAN

#### II.2.h. Evacuation Plan

The **ERC** will initially decide whether to shelter-in-place in the Turbine Building or evacuate (later input may be received by the outside response agency Incident Commander). Evacuation routes and assembly areas have been mapped out to apply to all potential emergency scenarios. Whenever there is a person employed at the facility who cannot use the stairs due to a disability, the ERC will designate and train a sufficient number of Evacuation Aides to provide coverage to assist in their evacuation should an emergency affect normal means of egress (e.g., the elevator) during their normal work hours. During an emergency event requiring site evacuation, Evacuation Aides will assist any employee requiring assistance and all personnel shall proceed calmly along the evacuation routes to the specified Assembly area (**Figure 3**). The evacuation is signaled through a loud, distinctive audio alarm played through the plant GAI-Tronics (PA) system followed by an announcement of giving instructions on partial or complete evacuation, evacuation routes and which assembly area to gather at based on the specific incident. Evacuation will also be announced on the plant two-way radio system whenever personnel may be in the field away from buildings (i.e., day shift). Personnel may perform emergency shutdown of their equipment if they are outside the immediate hazard area, can do so quickly (within 1–2 minutes), and are not placing themselves in danger by doing so.

Proceed to the assembly area located as follows. Refer to **Figure 3** for Primary and Alternate evacuation routes.

Primary Assembly Area (Power Block Evacuation) – NE of Power Plant Entrance, at Security Office.

Alt. Assembly Area 2 (Power Block Evacuation) – gate NW corner of Power Block, next to Switchyard Building.

Alt. Assembly Area 3 (Site-Wide Evacuation) – River Road at Power Plant Access Road.

Access to Announced Assembly Area is Blocked - proceed to an **alternate assembly area** or any other safe location (e.g., if blocked by fumes or spilled material, travel cross-wind then upwind of source).

Do Not Re-Enter - Evacuated personal shall not re-enter the site or leave the assembly area without approval of management or incident command.

Employee, visitor, and contractor head count is conducted at the assembly areas as described below.

During an emergency response, facility personnel, regardless of whether they are members of the ICS, must follow the direction of the **ERC/IC**. Each employee may become involved in an emergency in many different ways, from recognition to clean up, with their particular roles dependent upon the situations and their level of training. The basic emergency response roles and responsibilities of employees are briefly described below:

**Individuals who handle hazardous substances** and are trained to contain/control/clean up an incidental spill/release can do so if it is limited in quantity and poses no emergency or significant threat to the safety and health of employees in the immediate vicinity. Incidental releases that do not endanger life and health are not considered an emergency response. Incidental spills/releases are those not considered to be significant and should be cleaned up by local operations and should not activate the emergency response system.

**Any employee** must be able to recognize a situation that requires additional assistance. In this case, the employee's responsibility is to notify, provide as much information as possible, and be prepared to act as the first responder if properly trained as described in Section II.

**CONTROL ROOM:** This role is performed by the **Control Room Operator** who staffs the CONTROL ROOM at all times. The CONTROL ROOM receives all emergency calls, gathers emergency information, and notifies the **ERC** of the incident. The **Control Room Operator** serves as the communications focal point between the notifier, **ERC**, off-site resources, and other ICS members. The **Control Room Operator** at the direction of the **ERC** is responsible for logging all communications during each incident.

**Incident Commander (IC):** The person filling the role of **IC** may change during the course of an emergency situation as more senior (in terms of ICS authority) personnel arrive on the scene. In the absence of the primary or secondary **ERC**, the **Control Room Operator** will be acting **ERC** and serve as the **IC** upon initial notification of an incident until the primary or secondary **ERC** arrives on-scene. The **ERC** does not respond to the immediate scene of the incident in order to be able to direct the response. If the emergency requires outside assistance, the agency with jurisdiction dispatched by the 911 call center will determine whether to take over as

the **IC** based on information provided by the facility (e.g., Middletown South Fire District for fire/explosion/hazardous material release, Police for actual or threat of violence). Further transitions of command will be determined by the initial responding agency **IC** based on local, regional and national response plans and Incident Command System protocols.

The **IC** will be responsible for coordinating and controlling all communications as well as the emergency response operations with the assistance of the **ERC** and other personnel participating in the response. The Incident Commander is responsible for determining if additional resources to expand the response are needed to effectively respond if the incident and may notify the **ERC** to request assistance from off-site. The **IC** will also determine when an emergency is terminated (after consulting with response personnel and the **ERC**), coordinating/preparing written after action reports, and conducting debriefings.

**Emergency Response Coordinator (ERC)/Qualified Individual (QI):** The **Qualified Individual (QI)** has full authority, including for contracting, to implement oil removal actions. Since a **QI** may not be on-site at the time of an incident, the Emergency Response Coordinator is a designation used for the person on-site best able to assess and coordinate emergency response decisions and activities. On off-shifts, the **Control Room Operator** will serve as the **ERC** until the primary or secondary ERC/QI is mobilized to the site. **QIs** for this facility are identified in Section II (Core Plan) Emergency Notification Phone List. The duties of the **ERC** with respect to oil discharges, include, but are not limited to:

- Identify the character, exact source, amount, and extent of the release, as well as the other items needed for determining if emergency response and/or notification are needed.
- Activate internal alarms and hazard communication systems to notify all personnel.
- Notify the **Primary** or **Alternate ERC**, depending on who is on-call.
- Notify all response personnel and the OSRO contractor, as needed. If there is a fire or other hazard to human health, call 911 to obtain community emergency responder support.

- Middletown South Fire District

Other agencies that have a local emergency response roll will be provided a copy upon request.

In the event that the facility becomes a Hazardous Waste Large Quantity Generator, the plan would also be distributed to the following organizations:

- Middletown Police Department
- Middlesex Hospital

Facility and hazardous substance emergency information is also communicated through the Connecticut Tier II Chemical Inventory Reporting system to the following agencies:

- State Emergency Planning Commission (CT DEP)
- Middletown Capital Region Emergency Planning Committee
- Middletown South Fire District

In the event that the content of this ICP changes significantly, modified portions will be provided to the agencies on the ICP distribution.

#### **III.3.b.1. Facility Incident Commander and Qualified Individual**

The facility Incident Commander is the *ERC/Qualified Individual* (Primary and Alternate) identified in the Emergency Notification Phone List located in the beginning of **Section II** of this ICP. The responsibilities and duties of these individuals are described above in Section III.3.b.

All response personnel identified as Qualified Individuals have received at least Qualified Individual training. Those personnel also have previous power plant experience and training.

#### **III.3.b.2. Information**

Information is communicated at the KLES facility using a telephone network, two-way radio communications systems, and automated alarm systems for normal operations on the site as well as for emergency response. This is augmented by the Gai-tronics PA/emergency notification system.

### III - ANNEXES

#### Annex 3

#### Response Management System

**Telephone System:** During an emergency, the site phone system would function as a primary means of individual communications and the Gai-tronics system is the primary means of mass communication. The central communications point in an emergency is the CONTROL ROOM.

**Radio Communications:** The Control Room Desk is equipped for radio communications. KLES uses eight primary radio channels for normal plant operations. One base station on the console allows for two-way communications on 7 channels, and one channel Direct, in case the on-site signal repeater fails.

Control Room Operators carry hand radios at all times to communicate with the field operators and other plant personnel in their respective organizations. The following radio frequencies are in use at the facility:

Radio Frequencies in Use at KLES				
Loc.	Ant.	Frequencies	Emission Designator	Sta. Cls.
1	1	000464.83750000	7K60FXD 7K60FXE	FB2
2	1	000464.83750000	7K60FXD 7K60FXE	MO
2	1	000469.83750000	7K60FXD 7K60FXE	MO
3	1	000469.83750000	7K60FXD 7K60FXE	FX1
4	1	000456.83750000	7K60FXD 7K60FXE	MO

**Alarm Systems:** The facility central fire alarm system consists of a Main Fire Alarm Control Panel (MFCP) to supervise all automatic and manual fixed fire suppression and detection systems and provide common fire and trouble signal from Local Fire Alarm Panel (LFAP).

Alarm signals are initiated in response to activation of water flow or pressure switches from local fire protection systems. Trouble signals are initiated in response to activation of tamper switches, faulty devices, or break in supervisory circuits.

Visual alarms are provided throughout the plant area, and at the fire alarm panel in the control room.

Audible alarm horns are provided through the GAI-Tronics (PA) system in the plant area and at the fire alarm panel. Audible alarms are compatible with the

environment in which they are located, to ensure the signal is clearly audible above ambient noise levels

#### **III.3.b.3. Safety**

The **ERC** has control over safety during an Emergency Incident. The following Environmental Health and Safety activities will be completed or delegated by the **ERC** during an emergency:

- Patrol the area at a safe distance to identify additional safety and environmental hazards.
- Assist in keeping people away from the evacuated area until the "all clear" signal is given by the Incident Commander.

#### **III.3.b.4. Liaison –Staff Mobilization**

The **ERC** will coordinate mobilization between internal resources and external response teams, if necessary. Coordination with local authorities will be completed or delegated by the **ERC**.

#### **III.3.b.5. Public Information Officer**

The **Public Information Officer (PIO)** is responsible for interfacing with the public and media and/or with government agencies with incident-related information (e.g., on the incident's cause, size, and current situation; resources committed). The **PIO** will develop and issue public information alerts through a community notification system that sends email/text messages to subscribers and posts messages on the web ([www.kleenenergyct.com](http://www.kleenenergyct.com)) or releases them to the press. The message distribution list maintained by the **PIO** includes local emergency responders, City of Middletown and Town of Portland officials, district legislators and other members of the community who subscribe. The **PIO** may issue statements to the press and/or post them on-line, but these are unlikely to be the sole source of information except for minor incidents or normal activities that are likely to attract public interest (i.e., those that may generate unusual noise or traffic). In all cases where local emergency response agencies assume the IC roll, Kleen will be subordinate to local authorities considered by the public to be the most trusted source of information and have the primary roll in providing public information.

The planning section is responsible for the following job functions, which the *Plant Manager* may delegate to planning staff as follows:

***Health and Safety***

***Natural Resources and Wildlife***

***Demobilization Planner***

**III.3.d.1. Hazard Assessment**

In accordance with 40 CFR 112.7, it is reasonably possible that a spill event could occur at the facility. This section presents potential spill sources, potential spill scenarios, and potential causes of spills at the Station. In addition, this section addresses the U.S. Environmental Protection Agency (EPA) defined small, medium, and worst case discharges (40 CFR 112.21(h)(5) and Appendix G). Included in **Annex 9** of this ICP are tables of potential spill sources at the facility, spill scenarios, and general flow directions (refer to Section III 1.c. for details regarding spill flow direction and containment). The defined and/or calculated EPA discharges are also summarized in the above referenced table (calculations are presented in **Annex 14**, EPA Worst Case Discharge Planning Volume). In addition, the Applicability of Substantial Harm and associated certification has been included in **Annex 19**.

**Analysis of the Potential for an Oil Spill**

At this facility, the worst-case discharge would involve a catastrophic failure of one of the 4,061,400 gallon capacity tanks containing No. 2 fuel oil. The tanks were installed and tested in 2009 and are located within a secondary containment structure consisting of a concrete wall supported by an earthen berm, designed to contain a release caused by a catastrophic tank failure with a minimum design capacity of 5,155,416 gallons based on providing a minimum capacity of 110% of the tank plus a freeboard of 6 inches. The top of the wall was made significantly higher than the minimum criterion and is at least 2.4 feet above the 110% level and 3 feet above the 100% level. The required worst case scenario assumes that the inventory of one tank is not contained in the dike, conceivably due to the potential for a



The facility is well-lighted and conforms to 40 CFR Section 112.7 (g). Each operator has been issued a flashlight for areas that may become poorly lit for any reason. Flood lights are mounted in the fuel oil tank area to illuminate the tanks and immediate surrounding area.

The Emergency Diesel Generator (EDG) Tank and Diesel Day Tank located at the Ranney Wells Electrical Building are on City property. It also conforms to 40 CFR Section 112.7 (g), although access is through a locked gate on the fence around the tank and through a locked building door.

#### **III.3.e.3. Communications**

Detailed information related to the phone systems, radio communications, and alarm systems is provided in Section III.3.b.2, Information. Those systems will be used as appropriate during emergency response activities.

Process control systems monitor critical parameters such as pressure, temperature, and chemical levels and alarm when out of acceptable operating ranges to alert operators that the system is not be operating correctly and these may be early signs of an emergency. There are also specific early release warnings (e.g., detectors in the aqueous ammonia storage area) provided via these process control systems.

#### **III.3.e.4. Transportation**

Anticipated transportation needs are provided by the response resources identified in Section 2 of the ICP (e.g., an ambulance is procured by calling 911, boats are owned and operated by emergency response contractor, etc.). Additional transportation support will be contracted with upon identifying their need as much in advance as can be anticipated.

#### **III.3.e.5. Personnel Support**

Personnel that may be asked to respond in the case of an emergency at the KLES facility are summarized in this ICP. The **ERC** can use this information to call out the necessary resources required to address the particular emergency. Additional support for items such as meals, lodging, restrooms, equipment ,etc. will be contracted with prior to their need as much as can be anticipated.

The operational status of all equipment is maintained “Ready” at all times. Inspections, tests and drills for this equipment is discussed in the “Spill Response and Emergency Equipment Testing/Deployment”, **Section III.3.e.6** and **Annex 11**.

#### **III.3.f.2. Personnel Management**

A list of response personnel capabilities, response time, and qualifications has been provided in the beginning pages of **Section II** of this ICP. Responsibilities for response personnel are described in **Section III Annex 3.b**, Emergency Response Organization Roles and Responsibilities.

#### **III.3.f.3. Response Equipment Testing and Deployment**

**Annex 10** of this ICP includes lists of available materials, quantities and locations for emergency response. Kleen Energy will respond to on-site releases with available response equipment, if feasible. If necessary, additional response equipment is available through OSRO contractors as listed in **Annex 13**. On-site response equipment, including speedi-dry, spill pads, absorbent booms, etc., will be inspected as described in **Annex 11**. The on-site equipment is primarily for one time use. As such, it will not be specifically tested or deployed. Response equipment to be provided by OSRO contractors (e.g. skimmers, sea booms, boats) are maintained and tested by those contractors.

#### **Response Equipment Testing / Deployment**

The Response Equipment Testing and Deployment Drill Log, **Annex 11**, is provided to show dates the response equipment is tested and deployed. The log in each controlled copy of the ICP will be updated as tests and drills are conducted.

Response equipment deployment exercises will be conducted at least semi-annually to ensure that response equipment is operational and the personnel who operate the equipment in a spill response are capable of deploying and operating it. Only a representative sample of each type of response equipment is deployed and operated, while the remainder of the equipment is inspected and properly maintained. Testing of response equipment is conducted during deployment.

Facilities relying on an outside organization for some of its response equipment needs must ensure that the oil spill removal organization that is identified in the response plan to provide this response equipment certifies that the deployment exercises have been met. The Kleen Energy Facility will rely on an Oil Spill Removal Organization (OSRO contractor). Both the emergency response contract agreement with the OSRO and the certification and deployment certificate for their equipment will be included in **Annex 13**.

#### **III.3.f.4. Support Equipment**

Support equipment will be provided by the OSRO contractor. A list of support equipment that will be available is provided in **Annex 13**.

#### **III.3.f.5. Contracting**

All contracting activities will be coordinated by the **General Manager & Plant Manager**. Companies that have been contracted to function as the oil spill response organization (OSRO) are identified in the beginning pages of **Section II** of this ICP. Copies of those contracts have been included in **Annex 13**. Waste Disposal activities will be contracted as needed.

#### **III.3.f.6. Claims Procedures**

This ICP has been developed to meet the emergency response requirements for the regulatory programs described in Section I.1 of this ICP. There are no requirements for this ICP to include information on Claims Procedures based on the regulatory programs that are applicable to Kleen Energy.

#### **III.3.f.7. Cost Documentation**

This ICP has been developed to meet the emergency response requirements for the regulatory programs described in **Section I.1** of this ICP. There are no requirements for this ICP to include information on Cost Documentation based on the regulatory programs that are applicable to Kleen Energy.

**III.5.d. EPA Risk Management Program (RMP) General Duty**

The following general RMP training will be provided to employees required to operate/work on the aqueous ammonia system:

- HazCom Chemical Specific Hazards (Detailed review of the MSDS);
  - PPE
  - Air Monitoring
  - First Aid
  - Physical Properties
- ICP - Aqueous Ammonia Incident Specific Emergency Response Guidelines
- Plant Aqueous Ammonia (NH<sub>3</sub>) process specific training;
- Ammonia (NH<sub>3</sub>) Operating Procedures (operators only); and
- Ammonia (NH<sub>3</sub>) Offloading procedure and Chemical Handling Procedure.

**III.5.e. Training and Drill Records and Evaluation****III.5.e.1. Employee Training Program (40 CFR 112.7(f))**

The Plant Manager has overall responsibility to ensure that plant personnel are trained and qualified in the operation and maintenance of all facility equipment. Operation and maintenance training includes training every employee responsible for overseeing product delivery and unloading in the safety and health hazards of the materials and the procedure for unloading shipments before working independently.

Management has designated the **Compliance Coordinator** to be accountable for oil and hazardous/toxic substances spill prevention in accordance with 40 CFR Section 112.7(f). The **Compliance Coordinator** will coordinate and document specific employee training in the operation and maintenance of oil and hazardous/toxic substances pollution prevention equipment, discharge procedure protocols, applicable pollution control laws, rules and regulations and the content of this ICP. Training is performed annually (scheduled for approximately 11 to 13 months after the previous training) and new employees are trained during new employee orientation and before they assume responsibility for independently operating equipment that contains oil.

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## **III - ANNEXES**

### **Annex 11 (ERAP)**

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#### **Response Equipment Testing/Deployment**

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Facilities relying on an outside organization for some of its response equipment needs must ensure that the oil spill removal organization that is identified in the response plan to provide this response equipment certifies that the deployment exercises have been met. The Kleen Energy Facility will rely on an Oil Spill Removal Organization (OSRO contractor). Both the emergency response contract agreement with the OSRO and the certification and deployment certificate for their equipment are included in Appendix 1.

### **III.15. Annex 15 - Drills and Exercises**

#### **Facility Drill and Exercise Program**

The following Facility Drills and Exercises for the Kleen Energy Facility have been designed in accordance with 40 CFR Part 112.20, 112.21(c) and Appendix F to Part 112, Section 1.8.2. They are based on the National Preparedness for Response Exercise Program (PREP) and thus satisfy the facility's requirements for a drill/exercise program for petroleum spills. The Kleen Energy Facility plans to follow the PREP guidelines, where applicable.

The PREP was developed as a coordinated, multi-agency effort with the responsibility to exercise and evaluate government Area Contingency plans and industry spill response plans. This exercise program meets the Oil Pollution Act's mandate for exercises and represents guidelines for ensuring overall preparedness within the response community.

**Triennial Exercise Documentation**

For each quarter in which an exercise was completed, mark that with an “X” then mark each core component tested during an exercise. After 3 years, each Core Plan Component must have been checked off as having been exercised in at least 1 type of exercise.

Core Plan Components Involved in the Exercise														
(1) Notifications	(2) Staff mobilization	(3) Operate w/in the response mgmt. system in the plan	(4) Discharge control	(5) Assessment of discharge	(6) Containment of discharge	(7) Recovery of spilled material	(8) Protection of sensitive areas	(9) Disposal of recovered material and contaminated debris	(10) Communications	(11) Transportation	(12) Personnel support	(13) Equipment maintenance and support	(14) Procurement	(15) Documentation
<b>INTERNAL EXERCISES</b>														
QI Notification	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Emergency Procedures (Field)			<input type="checkbox"/>			<input type="checkbox"/>				<input type="checkbox"/>				
SMT Tabletop			<input type="checkbox"/>			<input type="checkbox"/>				<input type="checkbox"/>				
Equipment Deployment-KLES Equipment	<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>					

Triennial Exercise Documentation

Core Plan Components Involved in the Exercise

For each quarter in which an exercise was completed, mark that with an "X" then mark each core component tested during an exercise. After 3 years, each Core Plan Component must have been checked off as having been exercised in at least 1 type of exercise.

- (1) Notifications
- (2) Staff mobilization
- (3) Operate w/in the response mgmt. system in the plan
- (4) Discharge control
- (5) Assessment of discharge
- (6) Containment of discharge
- (7) Recovery of spilled material
- (8) Protection of sensitive areas
- (9) Disposal of recovered material and contaminated debris
- (10) Communications
- (11) Transportation
- (12) Personnel support
- (13) Equipment maintenance and support
- (14) Procurement
- (15) Documentation

	2011 Quarters				2012 Quarters				2013 Quarters				Core Plan Components Involved in the Exercise															
	1	2	3	4	5	6	7	8	9	10	11	12	(1) Notifications	(2) Staff mobilization	(3) Operate w/in the response mgmt. system in the plan	(4) Discharge control	(5) Assessment of discharge	(6) Containment of discharge	(7) Recovery of spilled material	(8) Protection of sensitive areas	(9) Disposal of recovered material and contaminated debris	(10) Communications	(11) Transportation	(12) Personnel support	(13) Equipment maintenance and support	(14) Procurement	(15) Documentation	
OSRO Equip. Deployment Certification <sup>11</sup>	<input type="checkbox"/>				<input type="checkbox"/>				<input type="checkbox"/>																			
<b>EXTERNAL EXERCISES INITIATED BY OTHERS</b>																												
Gov't Initiated Unannounced-If Selected																												
Area Notification Exercise																												
Area SMT Tabletop																												

<sup>11</sup> This is not an exercise but a reminder to obtain a new annual certification of deployment exercises from the response contractor for their response equipment.



**Triennial Exercise Documentation**

Core Plan Components Involved in the Exercise

For each quarter in which an exercise was completed, mark that with an "X" then mark each core component tested during an exercise. After 3 years, each Core Plan Component must have been checked off as having been exercised in at least 1 type of exercise.

	2011				2012				2013				(1) Notifications	(2) Staff mobilization	(3) Operate w/in the response mgmt. system in the plan	(4) Discharge control	(5) Assessment of discharge	(6) Containment of discharge	(7) Recovery of spilled material	(8) Protection of sensitive areas	(9) Disposal of recovered material and contaminated debris	(10) Communications	(11) Transportation	(12) Personnel support	(13) Equipment maintenance and support	(14) Procurement	(15) Documentation
	Quarters				Quarters				Quarters																		
	1	2	3	4	5	6	7	8	9	10	11	12															
Area Equipment Deployment																											
Area Exercise																											

## **SPILL MANAGEMENT TEAM TABLETOP INTERNAL EXERCISE**

<b>Applicability:</b>	Entire Kleen Energy Facility Spill Management Team
<b>Exercise Frequency:</b>	Annually
<b>Initiating Authority:</b>	Kleen Energy Facility
<b>Participating Elements:</b>	Spill Management Team ( <u>may also invite the OSRO and Middletown South Fire District for improved site awareness</u> )
<b>Scope:</b>	Exercise the spill management team's organization, communication, and decision-making abilities in internal exercise. In this exercise, there will not be a demonstration of operational response. A description of the response scenario (e.g., maximum most probable discharge), a description of several objectives (e.g., knowledge of the ICP, knowledge of the communication system), and a description of the core objectives will be documented in this exercise. In some cases, Kleen Energy Facility may use this exercise in preparation for a functional exercise.
<b>Objectives:</b>	<p>Kleen Energy Facility will exercise the Spill Management Team in:</p> <ul style="list-style-type: none"><li>• Individual and combined knowledge of the ICP;</li><li>• Proper Notification;</li><li>• Knowledge of the communication system;</li><li>• Ability to access the Emergency Response Contractor;</li><li>• Coordination of internal qualified facility personnel;</li><li>• A review of the transition from the internal team to a local, regional, state or federal team;</li><li>• The ability to effectively coordinate spill response activity with the National Response System (NRS) infrastructure. If the NRS does not participate in the exercise, the spill management team will demonstrate knowledge of the response coordination with the NRS; and,</li><li>• Ability to access information concerning the location of vulnerable and sensitive resources in the planning area.</li></ul> <p>NOTE: Kleen Energy Facility will conduct <u>one tabletop exercise in the triennial cycle that involves a worst case discharge.</u></p>
<b>Certification:</b>	Kleen Energy Facility self-certification
<b>Verification:</b>	Verification will be conducted by the USEPA Regional Office
<b>Records:</b>	
<b>Retention:</b>	5 years
<b>Documentation:</b>	See the following Tabletop Exercise Form
<b>Location:</b>	Facility Administration Office
<b>Evaluation:</b>	Self-evaluation by the Qualified Individual or Site Manager
<b>Credit:</b>	The facility will take credit for this exercise, as long as all objectives are met, the exercise is evaluated, and documentation is produced. Credit will also be given for an actual spill response when these objectives are met, evaluated, and documented.