KCE CT 11, LLC

EMERGENCY OPERATIONS PLAN

(EOP)

Disclosure: This document is for planning purposes and may receive further updates upon review and response from local fire departments and permitting agencies. A final version of this document will be produced prior to the initiation of project construction. The final version is intended to be an "operational" document. This comment applies to all sections highlighted and/or completed with "To Be Determined (TBD)".

VERSION CONTROL

Rev	Date of Issue	Reason for Issue	Prepared By:	Reviewed By:	Approved By:
0	TBD	Issued for Use	B. Garrett	R. Tepp	E. Nelson

Prepared By:	Reviewed By:	Approved By:
Paul Williamson	Bob Garrett	TBD upon completion of final document
Title: Senior Manager, Development	**Title: Compliance Officer**	**Title:**
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Date: 6/24/2023	**Date:**	**Date:**

SECTION I: EMERGENCY OPERATIONS PLAN (EOP)

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SECTION I: EMERGENCY OPERATIONS PLAN (EOP)

B. EOP SUMMARY

1. Overview

This Emergency Operations Plan (EOP) sets forth the emergency operations plans and procedures of Key Capture Energy, LLC (KCE). The following emergency response procedures are provided so that all personnel understand the practices to be followed to prepare for and provide immediate and effective response* to emergencies that might arise at KCE facilities. Because the safety of employees and the public is of primary concern, the Key Capture Energy (KCE) Emergency Response Coordinator (ERC) and each member of the KCE staff are committed to providing a safe, healthy work environment and are responsible for ensuring implementation of these procedures.

Life safety of personnel shall be the highest priority during any event.

2. Limitations

Responders will coordinate the plan and response according to all applicable laws and standards. Where a conflict exists between this plan and applicable laws and standards, the most conservative and restrictive approach shall be followed.

Response to emergencies, events or disasters shall only be undertaken to the level of the responders' training, Personal Protective Equipment (PPE), and resources available. No persons shall place themselves in harm's way to respond to an emergency.

Actual site conditions may be different than expected in this plan as there may be little to no warning during specific events to implement operational procedures.

3. Management of Change

A review of this Emergency Operation Plan (EOP) shall be conducted and documented at minimum on an annual basis, notionally January of each year. The plan shall also be reviewed and amended whenever there is a change in facility design, construction, operation, or maintenance or mandated regulatory changes that affect emergency response planning. When outside resources are changed or modified the plan shall be reviewed and updated to reflect the changes that may affect this plan. Details on the revision history are provided in Section F.

***Specific response details for each of the defined emergencies above can be found in the Section II Annexes.**

C. RECORD OF DISTRIBUTION

The following KCE personnel have received access to, and training on, the EOP on the following dates:

TBD upon final version of document.

Name	Title	Date Received Access to EOP	Date Received Training on EOP

SECTION I: EMERGENCY OPERATIONS PLAN (EOP)

D. EMERGENCY CONTACTS

Name	Title	Contact Information	Can Immediately Address Urgent Requests and Questions During an Emergency
Primary Contacts			
Rachel Goldwasser	Head of Legal & Regulatory	Redacted	X
Erika Nelson	Head of Project Operations	Redacted	X
Colin Tareila	Head of Asset Operations	Redacted	X
Backup Contacts			
TDB			

E. APPROVAL AND IMPLEMENTATION

1. Introduction to EOP

The EOP details roles and responsibilities for coordinating emergency response activities before, during, and after any type of emergency or disaster at KCE operational facilities.

The intent of the EOP is to coordinate emergency response efforts to save lives, reduce injuries, and maintain business continuity with its primary goal to assemble, mobilize and coordinate a team of responders and coordinators that can deal with any emergency.

This plan is implemented by the individual identifying an Emergency Condition either by dialing 911 or contacting the posted Emergency Contact Number. An emergency response coordinator (ERC) shall be assigned immediately upon identification of an Emergency Condition. The ERC is typically the Operations Manager for the associated facility but can be any individual who has been identified as having a role in the EOP.

2. Personnel with Responsibility for EOP

The following KCE personnel are responsible for maintaining and/or implementing the EOP, and/or have authority to change the EOP, as indicated:

Name	Title	Responsible for Maintaining EOP	Responsible for Implementing EOP	Authority to Change EOP
Erika Nelson	Head of Project Operations	X	X	X
TBD	O&M Manager		X	

3. Revision Control

Since the EOP's initial preparation, revisions have been made to the EOP on the following dates:

Revision No.	Date Revised	Description of Revision

4. Currentness of EOP

KCE hereby affirms, as of [Date-TBD], that this EOP supersedes all previous EOPs. This EOP was most recently approved by KCE on [Date-TBD].

5. Training Requirements

KCE has initiated an annual training program for personnel who are expected to have a role or responsibility included in this Emergency Operation Plan. This training program covers all aspects of the EOP. Personnel training will be completed and documented on an annual basis.

F. COMMUNICATION PLAN

1. Purpose & Scope

Key Capture Energy is dedicated to safe and responsible operations. As such, KCE is responsible for maintaining communications with people and organizations affected by an incident, emergency or unforeseen accident involving company operations, projects, or people. This plan applies to all incidents covered by this document.

2. Communications Responsibilities

Core Communications Team: The Core Communications Team will be responsible for formulating a communications response under this EOP. The Core Communications Team will convene as promptly as possible following the occurrence of the relevant incident or event and shall continue to meet regularly as the incident and the response thereto develops.

Purpose of Meetings: The meetings of the Core Communications Team will convene the relevant subject matter experts and managers of KCE required for effective information sharing and response formulation following an incident. The meetings will provide a forum for:

- exchange of information as to the relevant facts and circumstances surrounding the incident, operational actions that KCE is taking in response, and inquiries and other requests from affected stakeholders;
- communications response planning, including ensuring that all required stakeholders are notified and that KCE's messaging is unified and accurate; and
- planning for long-term incident response.

Team Members: The members of the Core Communications Team are as follows:

- Head of Operations (primary)
- Head of Legal & Regulatory
- Head of Construction
- Head of Market Development
- Head of HSEQ
- Head of Project Operations
- Emergency Response Coordinator (ERC) as designated via the EOP for the incident.

Additionally, incident-specific team members may be added to the Communications Team (as required by the Core Communications Team) for purposes of any specific incident.

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2. Specific Points of Contact

Specific members of the Core Communications Team will serve as the points of contact responsible for communicating with specific stakeholders. Each designated member under this sub-section 3 is

responsible for reporting communications with their respective stakeholders back to the rest of the Core Communications Team.

Media: Messaging to the media is to be formulated by the Core Communications Team. In the immediate aftermath of an incident, The Core Communications Team will identify a spokesperson, as required, to speak to media.

State Public Utilities Commission: KCE's Head of Legal & Regulatory, in consultation with the Core Communications Team, is responsible for communications with the respective state public utilities commissions.

Consumer Advocates: KCE's Head of Legal & Regulatory, in consultation with the Core Communications Team, is responsible for all communications with consumer advocate groups.

Fuel Suppliers: N/A. KCE does not own or operate assets with fuel suppliers.

Local and State Government Entities, Officials, and Emergency Operations Centers: The on-site ERC is responsible for communications with local and state government entities, officials, and emergency operations centers. The ERC is directed to provide local and state officials and emergency operations centers with the information that is immediately required to respond to an ongoing incident. Long-term response (including in respect of any remediation and/or root cause analysis for an incident) shall be developed by the Core Communications Team and communicated through the ERC or another designated member of the Core Communications Team, as appropriate.

Reliability Coordinator: KCE's Head of Market Development is responsible for all communications with the applicable reliability coordinator. The Head of Market Development shall keep the applicable reliability coordinator apprised of any incident by telephone, as appropriate.

G. MAINTENANCE OF PRE-IDENTIFIED SUPPLIES FOR EMERGENCY RESPONSE

As BESS facilities are normally unmanned and, except as otherwise referenced herein, do not require the use of consumable supplies, no supplies are expected or necessary to support KCE response to emergencies detailed in this plan.

H. STAFFING DURING EMERGENCY RESPONSE

As BESS facilities are normally unmanned, no on-site staffing is expected or necessary during emergency response. Except as may be specifically stated otherwise in this EOP, during an emergency the BESS will remain unmanned and, where applicable, personnel will be precluded from accessing the BESS unless / until determined safe for inspection / maintenance activities. In the case of a weather emergency impacting one of KCE's offices, employees not located in the impacted region shall be knowledgeable in and prepared to support the impacted state's operations. For further information related to staffing during severe weather events, please see Appendix 6.

SECTION I: EMERGENCY OPERATIONS PLAN (EOP)

I. IDENTIFICATION OF WEATHER-RELATED HAZARDS

See SECTION II: Annex A (WEATHER EMERGENCIES) and Annex E (HURRICANE) for information regarding how KCE identifies weather-related hazards of various types. KCE has developed both Cold and Hot Weather Operating Plans with specific operational instructions to address extreme weather events. These plans are provided in Appendix 6 for reference.

J. ACTIVATION OF EOP

1. Definition of Emergency

An emergency is defined as a situation in which the known, potential consequences of a hazard or threat are sufficiently imminent and severe that an entity should take prompt action to prepare for and reduce the impact of harm that may result from the hazard or threat, including an emergency declared by local, state, or federal government, or Independent System Operator (ISO) or another applicable reliability coordinator. Emergencies can happen before, during or after work hours and can be caused by a range of events and hazards involving both nature and people. For the purposes of this EOP, "incident", "emergency", and "event" are interchangeable terms. The many different types of emergencies include, but are not limited to:

- Smoke
- Fire
- Toxic Gas Release
- Medical Emergency
- Severe Weather
    - Extreme Heat
    - Winter Storm (Extreme Cold)
    - Hurricanes
    - Tornadoes
    - Floods
    - Lightning Storms
    - Drought / Water Shortage
- Seismic Event
- Hazardous Material Spill
- Workplace Violence
- Cybersecurity Threat
- Bomb Threats
- Pandemic / Epidemic
- Physical Security Breach

2. Activation of Emergency Response

In the event of an emergency, calling 911 is the preferred method for initiating emergency response. This should be followed by contacting KCE at the emergency contact phone number listed.

As set forth in Section III: Appendix 5 – Site Information, the KCE emergency contact phone number is clearly marked on informational/warning signs around the perimeter fencing and may be dialed by any individual, whether an employee or a member of the public. This line is answered 24 hours a day, 365 days per year by personnel instructed in how to initiate emergency response for the facility. The person receiving a call through the emergency contact number shall initiate this EOP by contacting the KCE Emergency Response Coordinator (ERC). As previously stated in Section E, the ERC is typically the Operations Manager for the associated facility but can be any individual who has been identified as having a role in the EOP.

3. Site-Specific Emergency Response

Responders will coordinate the plan and response according to all applicable laws and standards. Where a conflict exists between this plan and applicable laws and standards, the most conservative and restrictive shall be followed.

Response to emergencies, events or disasters shall only be undertaken to the level of the responders' training, Personal Protective Equipment (PPE), and resources available. No persons shall place themselves in harm's way to respond to an emergency.

Actual site conditions may be different than expected in this plan as there may be little to no warning during specific events to implement operational procedures.

4. Roles & Responsibilities

All KCE personnel with responsibilities for emergency response management or support shall be trained in the requirements of this plan on an annual basis.

Overall responsibility for the EOP lies with the Operations and Maintenance (O&M) Manager who executes the duties of the ERC. The ERC or their designee is responsible for program implementation, including coordinating severe weather activities, communicating emergency response procedures to personnel, and contractor coordination as needed. In addition, the ERC shall conduct routine updates and overviews with Emergency Responders including tabletop exercises, walkthroughs, and drills.

The personnel identified below shall have the corresponding responsibilities described below in connection with activation of the EOP.

<u>Operations & Maintenance Manager (or designee)</u>

- Initiate emergency response if not already initiated by the Remote Operations Center (ROC) by dialing 911 or calling local emergency response organizations directly as may be appropriate. Information to be provided to 911 operator or local emergency response organizations include:
    - location, type, and current status of the incident.
    - personnel injury (number, severity, status) if applicable.
    - property damage (type, severity) if applicable.
    - actions taken or in progress.
    - any safety guidance to ensure the safe arrival of response organizations;
    - ERC contact information.
    - contact information for the on-scene coordinator (if different than the ERC);
- Establish themselves as the ERC.
- Mobilize to the site and assume additional responsibility of On-Scene Coordinator.
- Communicate with all parties during an emergency.
- Direct the isolation of the facility from the grid when required or requested.

- Direct the isolation of electrical equipment to the maximum extent possible
- Monitor local news channels for critical information from the National Weather Service (NWS) including watches, warnings, and advisories for winter storms, tropical storms, and hurricanes issued by local NWS Forecast offices.
- Responsible for implementing and ensuring personnel familiarity with this EOP.

The Operations & Maintenance (O&M) Manager, or their designee acting as the ERC or On-Scene Coordinator, shall be responsible for reporting the incident throughout KCE using the process included in the KCE HSEQ Manual. Specifically, the ERC shall initiate an e-mail via INCIDENTS@keycaptureenergy.com for informing relevant operations and administrative contacts within KCE, to initiate corporate awareness and public communications activities in accordance with company structure and policies. The e-mail shall be formatted:

- *Subject: Initial Report – Location – Initial Classification – Date*
- *Body: Brief description of the event to include WHO, WHAT, WHEN, WHERE*

On-Scene Coordinator (Operations & Maintenance (O&M) Manager employee; if on-site)

- If there are employees on-site, the senior-most of such on-site employees will act as the On-Scene Coordinator and shall assist in the implementation of this plan by:
  - calling 911 (if not already done);
  - evacuating all personnel and securing the scene;
  - accounting for all personnel at a muster area;
  - assisting the evacuation of injured personnel if necessary;
  - communicating with the ERC during the emergency;
  - reporting the status of the facility to include evacuation of all on-site personnel;
  - liaising with any on-scene emergency responders*;
  - maintaining a written log and timeline of all response activities undertaken;
  - directing all media inquiries to the Communications Team;

***The On-Scene Coordinator, or the designated ERC when no KCE representative is on-site, will act as the liaison to the Fire Department and any other first responders until the ERC arrives on-site.**

All On-site Personnel

- Immediately report emergency situations to the senior KCE representative on-site;
- Call 911 to inform local emergency first responder personnel**;
- Notify the ERC of the situation using the KCE emergency contact phone number posted onsite

****There shall be no delay to report emergency events that require local emergency responders. The senior KCE representative, if on-site, will call 911 and then immediately notify the ERC using the emergency contact phone number posted on-site.**

Chief Operating Officer (COO) or Head of Operations

- Act as the liaison to the Management Team and Communications Team;
- Affirm, through endorsement of this EOP that all relevant operating personnel are familiar with this EOP and committed to following the plan, except to the extent where deviations are appropriate under the circumstances during the course of an emergency;
- Provide resources necessary to expeditiously restore BESS facilities to operation after an emergency event;
- Prioritize the recovery of BESS capacity (restoration) after an emergency once determined safe to do so.

Market Operations

- Monitor conditions and liaise as required with market stakeholders and the reliability coordinator as may be required during an emergency and detailed throughout this plan.

Legal and Government Relations

- Support in risk mitigation throughout the duration of the emergency;
- Be prepared to assist or perform outreach and reporting to the appropriate State and Federal Government agencies as may be required.

Public Relations Team

- Be prepared to implement the necessary Communication Plan consistent with the emergency event.

5. Preparation & Planning

Pre-planning for emergencies is a crucial element of this plan. The following steps will be taken:

- Consistent with KCE's Public Awareness Manual, fire departments and other first responders will receive a copy of this plan, participate in an on-site familiarization meeting, and be updated annually on any changes in equipment or operations;
- A copy of this plan shall be located at each facility;
- Buildings and property surrounded by fencing will be marked by signage that identifies specific hazards (such as the NFPA diamond, and all applicable Danger, Caution, Warning signal words);
- On-site personnel shall receive a directive to keep vehicles not actively in use for maintenance or repair activities out of the BESS fence perimeter to facilitate and ensure emergency egress when necessary;
- Safe approach distances are established for equipment's different failure modes and personnel are trained in these distances

- Safety Data Sheets (SDS) provided by manufacturers shall, where possible, be maintained on-site and provided to first responders.

NOTE: As BESS facilities are normally unmanned, no supplies are expected or necessary to support KCE response to emergencies detailed in this plan. During extreme weather, BESS will remain unmanned, and personnel will be precluded from accessing the BESS until determined safe for inspection / maintenance activities.

NOTE: BESS facilities do not utilize alternative fuels and therefore do not require on-site fuel storage or fuel testing requirements

6. Incident Assessment Matrix

As previously discussed, when an incident occurs at any level members of KCE's Communications Team will be notified. The Team will then convene and initiate the steps for evaluating and determining the severity of the event. An Incident Assessment Matrix is provided in KCE's internal Communications Plan to guide this effort. The Team will utilize the Incident Assessment Matrix to inform the ERC or other On-Scene Coordinators of the final determination for the respective incident.

7. Warning Systems & Alarms

Audible and visual (e.g., flashing lights) alarm systems have been established that reflect specific on-site hazard analyses. Personnel shall be trained on the significance of different alarms and the corresponding actions as outlined elsewhere in this plan.

Warning systems and alarms are tested at least every six months or more frequently per manufacturer specifications or code requirements are documented as completed. All site personnel, as well as those offsite at remote operations control centers shall be made aware of tests so as not to cause undue concern.

8. Emergency Response & Evacuation

No employee is required or permitted to place themself in harm's way in order to facilitate extinguishment, evacuation, or rescue. All rescue operations will be performed by trained professionals upon their arrival. Rescue operations will only be conducted after a risk-reward analysis is done and proper PPE is used to protect against any adverse hazards that may be encountered.

Only personnel who are properly trained in accordance with 29 CFR Part 1910.120(q)(6) may respond to hazardous chemical releases.

If personnel are onsite, they shall be required to evacuate to the designated muster areas for:

- Smoke
- Fire
- Toxic Gas Release

- Severe Weather
  - Hurricanes
  - Tornadoes
  - Floods
  - Lightning Storms
- Seismic Event
- Hazardous Material Spill
- Bomb Threats

The general procedure for evacuation shall be to:

- Stop all work activities as quickly as can be done so safely;
- Follow the emergency response flowchart;
- Secure the work area to prevent additional hazards;
- Calmly leave the work area and meet at a designated muster area;
- Provide egress assistance to other personnel if needed;
- Standby for instructions from the On-Scene Coordinator or ERC.

SECTION II: ANNEXES

A. ANNEX A – WEATHER EMERGENCIES

1. Extreme Heat

BESS are normally unmanned facilities designed with dedicated climate control and therefore have minimal exposure to hazards associated with extreme heat. The KCE HSE Manual provides directions for personnel protection from extreme heat. KCE will deem there to be an extreme heat event when the temperatures are forecasted to go above the design limits of the BESS or upon notification of an extreme heat event by the ISO or other regulatory entity.

When a summer weather threat exists, the facility's O&M Manager shall monitor local news channels for critical information from the National Weather Service (NWS) including warnings and advisories issued by local NWS Forecast offices.

For more information related to KCE's extreme weather response, please see the Hot Weather Operations Plan, provided in Appendix 6.

2. Winter Storm (Extreme Cold)

BESS are normally unmanned facilities designed with dedicated climate control and are therefore minimally susceptible to issues associated with extreme cold. The KCE HSE Manual provides directions for personnel protection from extreme cold. KCE will deem there to be an extreme cold event when the temperatures are forecasted to go below the design limits of the BESS or upon notification of an extreme cold event by the ISO or other regulatory entity.

When a winter weather threat exists, the facility's O&M Manager shall monitor local news channels for critical information from the National Weather Service (NWS) including winter storm watches, warnings, and advisories issued by local NWS Forecast offices.

For more information related to KCE's extreme weather response, please see the Cold Weather Operations Plan, provided in Appendix 6.

3. Hurricane

See Annex E (HURRICANE) below.

4. Tornado

BESS are normally unmanned facilities designed to local codes and standards and therefore have limited exposure to hazards associated with tornadoes.

When a tornado threat exists, the facility's O&M Manager shall monitor local news channels for critical information from the NWS including watches, warnings, and advisories issued by local NWS Forecast offices.

If personnel are on-site when the potential for a tornado exists, and prior to experiencing sustained winds >25 miles per hour, material shall be secured, and any aerial work stopped upon the issuance of a tornado warning. The facility shall be evacuated, and all personnel will report to the nearest shelter area, to be determined prior by O&M personnel during daily safety briefs. In the event O&M personnel are outside and unable to evacuate to the shelter, the following guidance is provided to personnel on-site:

- lie flat in a nearby ditch or depression, covering their head with their hands, being aware of the potential for flooding;
- find shelter in a low, flat location;
- avoid sheltering under an overpass or bridge;
- do not try to outrun a tornado in congested areas in a vehicle;
- leave their vehicle to find safe shelter;
- be aware of the potential for flying debris.

Following tornado or high wind events, the facility will be evaluated by the O&M personnel for damage. All repairs will be performed under standard operational procedures.

5. Flooding and Flash Flood

BESS are normally unmanned facilities designed to local codes and standards and therefore have limited exposure to hazards associated with flooding.

When a flooding threat exists, the facility's O&M Manager shall monitor local news channels for critical information from the NWS including watches, warnings, and advisories issued by local NWS Forecast offices.

Flash flooding is a result of heavy localized rainfall such as that from slow moving, intense thunderstorms. Flash floods often result from small creeks and streams overflowing during heavy rainfall. These floods often become raging torrents of water which rip through riverbeds or canyons, sweeping everything with them. Flash flooding can occur within 30-minutes to six hours of a heavy rain event. In hilly terrain, flash floods can strike with little or no advance warning. Distant rain may be channeled into gullies and ravines causing flash flooding in minutes. In the event of a flash flood, the following guidance is provided to personnel onsite:

NOTE: It does not have to be raining for flash flooding to occur.

- do not drive through flooded areas, even if it looks shallow enough to cross;
- person leading work shall make a judgement to either shelter in place, or immediately secure the work and travel to safe refuge;
- do not cross flowing streams on foot where water is above your ankles;
- be especially cautious at night as it is harder to recognize water danger then;
- do not attempt to outrace a flood on foot if flooding is seen or heard, move to higher ground immediately;
- be familiar with nearby land features where you work;
- wait 15 to 30 minutes, or until high water recedes, prior to leaving shelter.

6. Lightning Storms

BESS are normally unmanned facilities designed to local codes and standards and therefore have limited exposure to personnel hazards associated with lightning.

If personnel are onsite and a lightning storm is within 10 – 30 miles and approaching the site, the following guidance is provided:

- notify facility's O&M Manager and all on-site employees;
- stop work safely and head to company or personal vehicles if storm/lighting is still approaching the site, get in and stay in vehicles that have rubber tires only;
- once the storm passes, remain in the vehicle for at least 30 minutes depending on passing storm severity, and wait for an "OK" from the O&M Manager in charge of monitoring the storm.

Market Operations Responsibilities

In the case of any inclement weather, the Market Operations Team shall:

- monitor all communications from Independent System Operators (ISOs) including, but not limited to Operating Condition Notices (OCN), Advisories, and other communications;
- ensure site operations are aware of all ISO notices regarding impending winter weather;
- communicate with ERC regarding any such communications;
- ensure KCE representative is on-call 24/7 to receive and respond to notices and to communicate internally (including ERC) and with site operator / ROC during periods when ISOs have issued a weather notice;
- ensure local Transmission Distribution Service Provider (TDSP) has KCE/ROC contact info heading into any period when ISO has issued a weather notice.

B. ANNEX B – WATER SHORTAGE

BESS are normally unmanned facilities that do not require water or access to a water source and are unaffected by water shortages during operational periods.

SECTION II: ANNEXES

C. ANNEX C – RESTORATION OF SERVICE

Once emergency response is complete and locations are determined to be safe for personnel access, where required, Head of Operations and Head of Project Operations, with advice from the ERC, Head of Market Development, and General Counsel, shall determine whether restoration of service is safe and appropriate. Restoration of service shall be performed in coordination with the applicable Qualified Scheduling Entity and with the appropriate approvals (if required) from the Independent System Operators (ISO).

SECTION II: ANNEXES

D. ANNEX D – PANDEMIC AND EPIDEMIC

BESS are normally unmanned facilities therefore have limited exposure to personnel hazards associated with outbreaks and pandemics. Guidance associated with pandemic response shall be included in the KCE Safety Manual or provided as a standalone pandemic guideline. KCE is able to operate under work-from-home conditions if required due to a pandemic or epidemic.

SECTION II: ANNEXES

E. ANNEX E – HURRICANE

BESS are normally unmanned facilities designed to local codes and standards and therefore have limited exposure to hazards associated with hurricanes.

When a hurricane threat exists, regardless of Category, the facility's O&M Manager shall monitor media outlets for critical information from the NWS including watches, warnings, and advisories issued by local NWS Forecast offices and shall be cognizant that conditions can change rapidly.

Evacuation and re-entry planning for assets located in Hurricane Evacuation Zones shall follow the guidance provided by local authorities.

The following are the general guidelines for hurricane conditions.

CONDITION 4

- hurricane within 72-hours of arrival, and possible movement towards facility;
- brief all personnel;
- avoid on-site work and travel;
- start clean-up and securing operations, if required;
- plan for next condition.

CONDITION 3

- hurricane within 48-hours of arrival;
- intensify clean-up and securing operations, if required;
- evaluate starting some Condition 2 activity.

CONDITION 2

- hurricane within 24-hours of arrival;
- complete all clean-up and securing operations, if required.

CONDITION 1

- hurricane within 12-hours of arrival;
- shutdown all on site activities, if any;
- complete all items above;
- ensure complete evacuation of facility if any personnel onsite;
- ensure ROC monitoring until hurricane passes.

POST HURRICANE

- once practical to visit site, a walkdown shall be conducted starting with a perimeter walk outside the fence, re-entering inside the fence after visually confirming conditions are safe to continue;
- take pictures from all sides of the facility for documentation.

SECTION II: ANNEXES

F. ANNEX F – CYBERSECURITY

Below is KCE's Cybersecurity Incident Response Plan. KCE maintains additional cybersecurity-related plans and procedures not submitted herein.

G. ANNEX G – PHYSICAL SECURITY

Sabotage may take different forms and it would be impossible to define any and all sabotage that could occur. KCE follows the NERC Event Reporting Plan used to comply with NERC Standard EOP-004 and also adheres to NERC's Critical Infrastructure Protection ("CIP") Standard, CIP-003 (Cyber Security Incident Response Plan). Additionally, the following checklist shall be used when responding to physical security, as well as cybersecurity, incidents:

1	If sabotage has been identified or reported immediately notify the O&M Manager.
2	The O&M Manager will determine when and if it is safe for personnel to continue work on site (if personnel are on-site) and, as required, make appropriate notifications to personnel based on initial information and site condition.
3	If appropriate call 911 or another designated Emergency Services provider. Refer to site contact and location information to ensure prompt response.
4	If off-site Emergency Response personnel are required, the O&M Manager shall coordinate to ensure access to the site and proper direction.
5	If appropriate, the O&M Manager shall notify appropriate law enforcement as necessary to conduct an investigation*.
6	If sabotage resulted in creating an unacceptable safety risk, the affected equipment shall be shut down or affected area cleared and barricaded.
7	The O&M Manager shall notify the Head of HSEQ and CIP Senior Manager to determine whether the event is reportable in accordance with NERC Reliability Standard EOP-004.

*** Any instances of trespassing, vandalism, or suspected criminal activity shall be immediately reported to O&M Manager so that local police can be engaged. The O&M Manager shall use judgement to determine whether components of this EOP shall be activated.**

H. ANNEX H – FIRE

1. Smoke/Flames from an Unknown Source

Smoke emanating from a KCE BESS is an indication of an abnormal and hazardous condition and can be indicative of potential issues including a thermal runaway event. The smoke is possibly flammable and an inhalation hazard, and may ignite at any time.

If fire or smoke is observed emanating from a KCE BESS at any time it shall be treated as a fire.

- evacuate personnel to a designated muster location
- contact the senior KCE representative on-site or, in their absence, dial 911
- contact the KCE emergency contact phone number posted on-site to inform the ERC
- prevent non-emergency responder access to the BESS

If a report of smoke emanating from a BESS with no personnel on-site is received, the person receiving the report shall call the Emergency Services Dispatch Number set forth in Appendix 4 – Site Information and then the Emergency Contact Number for the site (also included in Appendix 4 – Site Information).

2. Fire External to Battery Container or Enclosure

In the event there is a visible fire beyond the incipient stage external to a battery container or enclosure, including fires external to the perimeter fencing, then the following actions apply.

NOTE: Batteries remain energized even if all contactors, breakers, and switches have been opened.

- Contact the senior KCE representative onsite or, in their absence, dial 911
- Evacuate the site via the safest egress path and report to the designated muster location.
    - if heavy smoke is encountered stay low and breathe through a handkerchief or other fabric; move away from the area;
    - assist anyone having trouble leaving the area so long as doing so does not put the assistor at additional risk;
    - do not leave the designated muster point until advised to do so by ERC.
- On-Scene Coordinator shall account for all employees, contractors, and visitors;
- Contact the KCE emergency contact phone number posted onsite to inform the ERC;
- Remove any obstructions (vehicles, material, etc.) that might impede the response of emergency personnel to the scene;
- Establish appropriate barriers and traffic barricades to keep unauthorized (non-emergency) personnel from accessing BESS;
- Once the Fire Department is onsite, provide:
    - SDS
    - site-specific EOP
    - a liaison to remain with the Fire Department, when possible
        - To the maximum extent possible, responding fire crew should remain outside the fence, pull back to a safe distance and continue to allow the fire to burn itself out.

- A Fire Department staging area will be designated on the final plans outside of the project fence line (see Figure 2). It is recommended that fire department staging areas are established at angles relative to the sides of the ESS enclosures to reduce potential impact from flying projectiles or debris in the event of an explosion event.
- **The Fire Department should not attempt to enter the site fence line unless there is clear threat to life safety.**
- Allow the container to burn until it self-extinguishes, while protecting surrounding areas (defensive firefighting).

- Follow the instructions of Emergency Responders;
- Do not re-enter site until fire department has turned the site back over to KCE O&M Manager and KCE SME issues an 'all clear' for designated personnel.

NOTE: During defensive firefighting efforts application of high volumes of water from an appropriate distance may be applied to the outside of the container to help cool the unit and prevent further reactions or a fire from developing. Fire crews may choose to utilize a water stream or fog pattern to protect the surroundings or control the path of smoke.

NOTE: The ERC shall coordinate with BESS Supplier and direct the disconnecting of the BESS from the grid once notified of a fire event that has the potential to impact operations.

If a report of fire external to a BESS container with no personnel onsite is received, the person receiving the report shall call the Emergency Services Dispatch Number and then the Emergency Contact Number for the site (included in Appendix 4 – Site Information).

3. Fire Internal to Battery Container or Enclosure

In the event there is a known or suspected fire internal to a battery container or enclosure, then the same actions apply as a fire external to a battery container, but the below MUST be noted.

NOTE: Some fire suppression systems are designed to work in a contained environment and some ventilation systems have programmed functionality to improve effectiveness. DO NOT open container or enclosure doors until it has been determined no hazards are present, and with approval of emergency personnel and the Executive VP of Operations. Atmospheric monitoring, either remotely or via local sampling, is required to confirm that the atmosphere will not become explosive when outside air is admitted to container or enclosure.

4. Post-Fire Overhaul

The fire department will make the final determination regarding when the scene is safe to release the site to staff. In some circumstances the scene may need to be safeguarded for investigators to examine the event failures. If the event was caused by a criminal act, the facility's O&M Manager shall be guided by law enforcement for direction.

Hazards after a fire should be identified at the time of installation such that recommendations for personal protective equipment (PPE) are available for clean-up crews and hazardous materials

(HAZMAT) teams. This may include respirators to protect personnel from toxic gas that continues to be generated from hot cells. Firewater retention and cleanup measures may be required by local regulations. Once first responders have turned the site back to KCE, the SME(s), in coordination with the ERC, shall direct on-site personnel on procedures for securing the site for safety and pending any investigation.

In addition to the gas generation risk, cells that remain hot also pose a delayed ignition risk, whereby heat in the cell may transfer to undamaged adjacent cells or remaining active material and reignite the fire. As such, fire-damaged equipment must remain monitored, remotely or by establishing a fire watch onsite for a minimum Twenty-four (24) hours to extend to a period of length identified in consultation with equipment manufacturers and the SME(s).

Care should be taken to ensure that damaged batteries containing energy have been handled safely in accordance with disposal procedures. For batteries involved in a fire, care should be taken with handling or dismantling battery systems involved in fires as they may still contain hazardous energy levels.

5. Conditions Associated with Energy Storage Systems

BESS are generally new applications of existing technology currently gaining widespread adoption. It is important to recognize certain technical aspects when developing response actions.

Unique Challenges

Energy storage systems present a unique challenge for fire fighters. Unlike a typical electrical or gas utility, an energy storage system does not have a single point of disconnect. Whereas there are disconnects that will de-energize select parts of the system, the batteries themselves will remain energized.

The following hazards may be encountered when fighting fires in energy storage systems:

- shock or arcing hazard due to the presence of water during suppression activities
- electrical enclosures may not resist water intrusion from high-pressure stream of a fire hose
- batteries damaged in the fire may not resist water intrusion
- damaged conductors may not resist water intrusion
- shock hazard due to direct contact with energized components
- no means of complete electrical disconnect
- chemical spills
- flammable gases
- toxic gases (visible and non-visible)
  thermal runaway and explosions

Fire and Water

Due to the hazards described above, care and consideration should be applied when considering fire suppression by means of water inundation within energy storage systems. Because water as an extinguishing agent is commonplace, the appropriate use of water should be assessed.

KCE recommends use of water be limited to defensive firefighting efforts (application of high volumes of water from an appropriate distance applied to the outside of the container and nearby equipment / landscaping). Fire crews may choose to utilize a water stream or fog pattern for defensive firefighting to protect the surroundings or control the path of smoke.

The local fire department should be informed of appropriate fire suppression methods for the energy storage system type as identified by the equipment manufacturer. Coordination with the BESS manufacturer is recommended as this may include water in some cases, and in all scenarios its use should not be discouraged. All such considerations and information will be reviewed during KCE local responder training.

All fire extinguishing equipment, whether automatic or manual, is regularly inspected for functionality as per manufacturers' guidance and required by local fire codes.

SECTION II: ANNEXES

I. ANNEX I – TOXIC GAS RELEASE

Toxic gas releases may be the consequence of abnormal and hazardous conditions and can be indicative of potential issues including a thermal runaway event. The gas is possibly a combustible and inhalation hazard and may ignite at any time.

If gas is known or suspected to be released from a KCE BESS at any time it shall be treated as a fire.

- Evacuate personnel to designated muster location
- Contact the senior KCE representative onsite or, in their absence, dial 911
- Contact the KCE emergency contact phone number posted on-site to inform the ERC
- Prevent non-emergency responder access to the BESS

If a report of gas release from a BESS with no personnel on-site is received, the person receiving the report shall call the Emergency Services Dispatch Number and then the Emergency Contact Number for the site (included in Appendix 5 – Site Information). Appendix 1 - Emergency Response Flow Chart illustrates the required steps.

J. ANNEX J – MEDICAL EMERGENCY

If an employee is injured, or an accident has occurred on site and first aid is not enough treatment for the emergency, 911 must be called. The call to 911 can be made by phone by any available personnel.

A second notification will be made to Contact the KCE emergency contact phone number posted onsite to inform the ERC.

1. Serious Injury

The following procedures apply for serious medical injuries such as unresponsive subject, bite / sting for personnel who are allergic, bone fractures, neck trauma, or severe burns after 911 has been called.

- On-site personnel shall meet EMS responders at site entrance and direct them to incident location
- Do not leave or move the injured unless directed to by emergency medical service personnel
- Administer first aid if necessary
- The ERC shall inform Human Resources to contact employee's personal emergency contact
- Follow the incident reporting guidelines included in KCE Health, Safety, and Environmental (HSE) Manual

2. Non-Emergency Safety Incident

In the event a safety incident occurs where emergency response is not required (first aid treatment, near miss, etc.) work is to be stopped immediately and reported to the Operations Manager. Risk will be reassessed, adequate controls implemented, and the situation made safe before resuming the task. The Operations Manager shall follow the incident reporting guidelines included in the KCE HSE Manual.

SECTION II: ANNEXES

K. ANNEX K – SEISMIC EVENT

BESS are normally unmanned facilities designed to local codes and standards and therefore have limited exposure to hazards associated with earthquakes.

Earthquakes may strike with little to no advance warning. As such, when an earthquake does occur, it is important to stay as safe as possible. Be aware that some earthquakes are actually fore-shocks, and a larger earthquake may subsequently occur. Also, be aware that many earthquakes are accompanied by aftershocks after the main event has occurred. If an earthquake occurs minimize your movements to a few steps to a nearby safe place until the shaking has stopped. Move away from the enclosures, structures, light poles, and utility wires. If safe to do so, personnel shall take the First Aid kit with them.

Once in the open stay there until the shaking stops to prevent being hit by falling debris.

Following seismic events, the facility will be evaluated by O&M personnel for damage. All repairs will be performed under standard operational procedures.

SECTION II: ANNEXES

L. ANNEX L – HAZARDOUS MATERIAL SPILL

The Project Spill and Prevention Control and Countermeasure Plan (SPCC) provides guidance for pollution prevention and spill response. The Product Safety Data Sheet SDS shall be reviewed, and the area evacuated if necessary. Only properly trained personnel with appropriate PPE shall clean up a spill.

M. ANNEX M – WORKPLACE VIOLENCE

To ensure a safe work environment for all employees, KCE expressly prohibits any acts or threats of violence by any employee against any other employee, client, vendor, or visitor, or self-inflicted violence, except in extreme cases where self-defense may become necessary. If any behavior is noticed that could be perceived as an act or threat of violence, inform the O&M Manager, who will contact the authorities.

SECTION II: ANNEXES

N. ANNEX N – BOMB THREAT

If a bomb threat is received by phone, email, text, or a handwritten note immediately notify the O&M Manager who will contact 911, or local police department. The O&M Manager shall instruct all personnel to evacuate the facility via the nearest exit.

When ordering an evacuation due to a bomb threat, it is important that employees be trained regarding how to evacuate. If a bomber is nearby and sees everyone conspicuously evacuating a space, they may decide to detonate the device early. Therefore, it is imperative that personnel remain calm and evacuate in an orderly fashion, without drawing any unnecessary attention to themselves or the situation.

If a bomb threat is received by phone:

- Remain calm and keep the caller on the line for as long as possible;
- DO NOT HANG UP, even if the caller does;
- Listen carefully, be polite and show interest;
- Try to keep the caller talking to learn more information;
- If possible, inform a colleague using text, handwritten note, or other discrete methods to call the authorities or, as soon as the caller hangs up, immediately notify them yourself;
- If your phone has a display, copy the number and/or letters on the window display;
- Complete the Bomb Threat Checklist in the appendices of this plan;
- Write down as much detail as you can remember, trying to get exact words;
- From a different phone, contact authorities immediately with information and await instructions.

If a bomb threat is received by handwritten note:

- Notify the O&M Manager who will contact 911, or local police department;
- Handle the note as minimally as possible. Do not throw it away;
- Turn the note over to authorities upon request when they arrive.

If a bomb threat is received by e-mail:

- Notify the O&M Manager who will contact 911, or local police department;
- Do not delete the message or forward it to anyone else unless directed to do so by FIRE/EMS authorities.

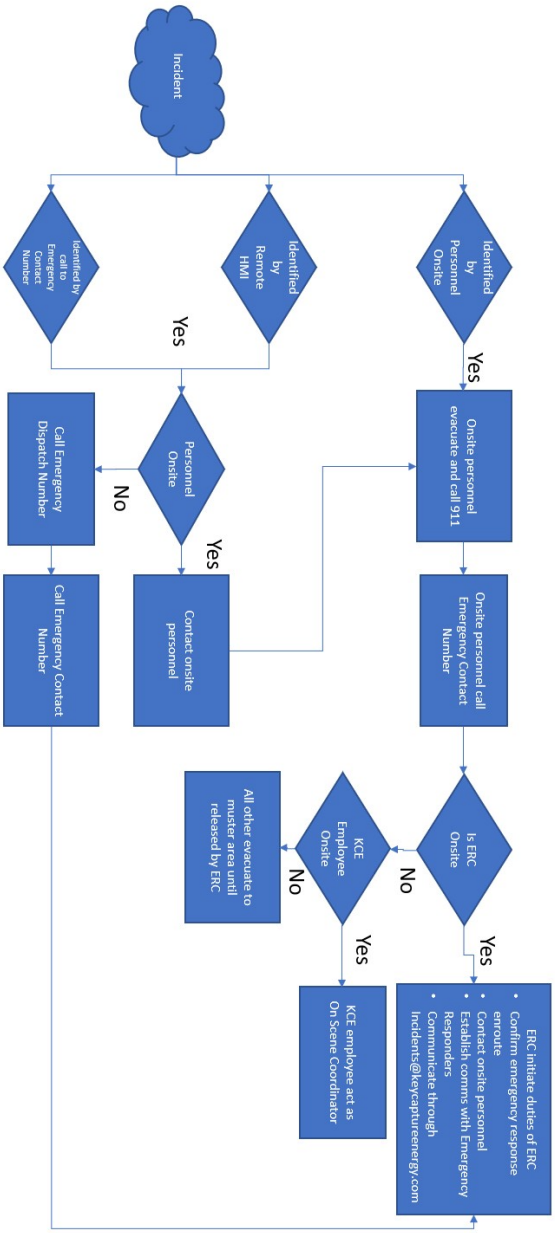
If a bomb threat is perceived due to seeing a suspicious package evident by:

  - no return address
  - excessive postage
  - stains
  - strange odor
  - strange sounds
  - unexpected delivery
  - poorly handwritten
  - misspelled words
  - incorrect titles

  - foreign postage
  - restrictive notes
- Notify the O&M Manager who will contact 911, or local police department;
- Do not use two-way radios or cell phone as radio signals have the potential to detonate a bomb;
- Do not touch or move a suspicious package;
- As soon as the danger has passed, an authorized “all-clear” will be issued and personnel will be allowed to return to the facility.

SECTION III: APPENDICES

APPENDIX 1 – RESPONSE FLOWCHART



SECTION III: APPENDICES

APPENDIX 2 – CHECKLISTS

For each checklist item:

- If the item inspected is satisfactory, check the OK box;
- If a deficiency is identified, complete the Comments section and indicate the Action Taken;
- If the item does not apply, check the N/A box.

Emergency Response	***OK***	***N/A***	***Action Taken / Comments***
Facility evacuated, if required			
Emergency responders en route, if required			
Communications established with emergencyresponders			
BESS disconnected from grid, if required			
Crisis communications plan initiated, if required			
Other			

Emergency Response Planning	***OK***	***N/A***	***Action Taken / Comments***
Emergency response plans (including importantphone numbers) written and available			
Training provided and drills performed for persons required to implement emergencyresponse			
Housekeeping maintained to ensure egress paths are clear and no missile hazards exist inperiods of high winds			
Site work cancelled in advance of extreme weather			
ROC informed of potential for extreme weather			

Fire & Explosion Prevention	***OK***	***N/A***	***Action Taken / Comments***
Fire extinguishers inspected monthly and servicedby contractor annually			
Emergency telephone number posted in clearand conspicuous locations			
Trash is removed at least daily from building			
Fire, smoke, H2 detection systems and HVAC inspected and serviced			
Exterior locations free of trash and combustible debris			

SECTION III: APPENDICES

APPENDIX 3 – BOMB THREAT CHECKLIST

Bomb Threat Checklist			
Date:	Time:		
Time Caller Hung Up:	Phone # Where Call Received:		
Ask Caller:			
Where is the bomb located? (Building, floor, room, etc.):			
When will it go off?			
What does it look like?			
What kind of bomb is it?			
What will make it explode?			
Did you place the bomb? Yes No Why?			
What is your name?			
Exact Words of Threat:			
Information About Caller:			
Where is the caller located? (background/level of noise)			
Estimated age:			
Is voice familiar? If so, who does it sound like?			
Other points:			
Caller's Voice		**Background Sounds**	**Threat Language**
❑ Female ❑ Male ❑ Accent ❑ Angry ❑ Calm ❑ Clearing throat ❑ Coughing ❑ Cracking voice ❑ Crying ❑ Deep ❑ Deep breathing ❑ Disguised ❑ Distinct	❑ Excited ❑ Laughter ❑ Lisp ❑ Loud ❑ Nasal ❑ Normal ❑ Ragged ❑ Rapid ❑ Raspy ❑ Slow ❑ Slurred ❑ Soft ❑ Stutter	❑ Animal noises ❑ House noises ❑ Kitchen noises ❑ Street noises ❑ Booth ❑ PA system ❑ Conversation ❑ Music ❑ Motor ❑ Clear ❑ Static ❑ Office machinery ❑ Factory machinery ❑ Local ❑ Long Distance	❑ Incoherent ❑ Message read ❑ Taped message ❑ Irrational ❑ Profane ❑ Well-spoken
Other Information:			

SECTION III: APPENDICES

APPENDIX 4 – CONTACT INFORMATION

Organization	Contact	Phone	Description
TBD	TBD		Remote Operations Center
KCE	Erika Nelson	Redacted	Head of Project Operations
KCE	TBD		CT O&M Manager
KCE	Robert Tepp	Redacted	Director of HSEQ
KCE	Brian Hayes	Redacted	CEO
KCE	Jim Brown	Redacted	Interim Head of Construction
KCE	John Bresnahan	Redacted	CFO
KCE	Rachel Goldwasser	Redacted	Head of Legal & Regulatory
KCE	Bob Garrett	Redacted	Compliance Manager
KCE	Joel Turkheimer	Redacted	Head of Market Development
KCE	Shaun Boggs	Redacted	Head of IT & Cybersecurity
TBD	TBD		HVAC provider and technician – emergency contact
TBD	Outages & Hazards		Distribution Service Provider – emergency contact

SECTION III: APPENDICES

APPENDIX 5 – SITE RELATED INFORMATION

KCE CT 5, LLC

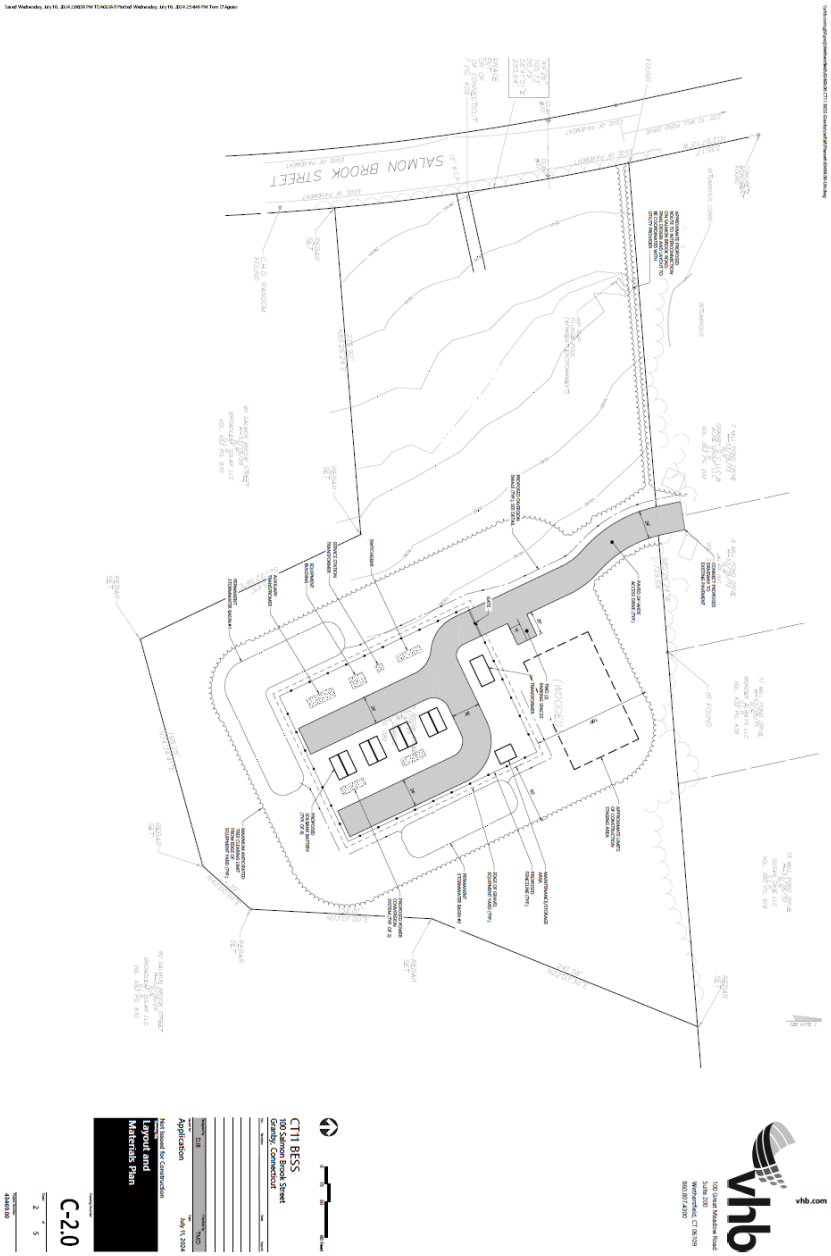
Site Location

The Project is a proposed 4.99 MW BESS located at 100 Salmon Brook St, in Granby. The Subject property is a 4.85 acres lot also known as Tax Parcel ID 101263. The Project is located in Use District Zone Business C2 on a vacant parcel. The 4.99 MW/19.96 megawatt- hour (MWh) battery energy storage system will include two Power Electronic inverters with eight Canadian Solar SolBank 3.0 battery containers.

As shown in Figure 1 below, all ESS units and associated electrical equipment are surrounded by protective fencing with one (1) access gate. There is a deeded right of way providing access to the site from Mill Pond Drive. An access road will be built as indicated in the plans. The site is not located in a Special Flood Zone (AE or E).

Commented [GU2]: Confirm? Or will there be another access road built?

SECTION III: APPENDICES



SECTION III: APPENDICES

*** 911 should be used during an emergency ***

Emergency Services, Granby and surrounding area		
Granby Fire Department		
Organization	**Address**	**Phone**
General Emergency		911
Non-Emergency		(860) 875-2543
Granby Fire Marshall	Brian Long	(860)-844-3553
Fire Marshal/Burning Official	15 N Granby Road Granby, CT 06035	(860)-844-5318
Lost Acres Fire Department, Granby Center Station	206 Salmon Brook St. Granby, CT 06035	(860)-653-6668
North Granby Station	352 N Granby Road North Granby, CT 06060	(860) 653-6668
West Granby Station	256 W Granby Road North Granby, CT 06060	(860) 653-6668
East Granby Volunteer Fire Department	7 Memorial Dr. East Granby, CT 0626	(860) 653-6367
Police		
Organization	**Address**	**Phone**
General Emergency		911
Non-Emergency		(860) 844-5335
Chief of Police	Scott M. Sansom 15 N Granby Road Granby CT 06035	(860) 844-5335
State Police	(Troop H)	(800) 968-0664 (860) 534-1000
Medical Services		
Organization	**Address**	**Phone**
General Emergency		911
CT Children's Hospital	282 Washington St. Hartford CT	(860) 545-9000
Hartford HeathCare-GoHealth Urgent Care	7 Mill Pond Dr. Granby, CT 06035	(860) 323-3164
Winsted Health Center	115 Spencer St, Winsted, CT 06098	(860) 379-0888
Hartford Hospital	80 Seymour St. Hartford CT	(860) 545-5555

SECTION III: APPENDICES

Rockville General Hospital	31 Union St. (Rte 74) Vernon CT	(860) 872-0501
Saint Francis Hospital	114 Woodland. Hartford CT	(860) 714-4000
Windham Hospital	112 Mansfield Ave. Willimantic CT	(860) 456-9116
Other Emergency Services		
Organization	**Phone**	
Poison Control Center	(800) 343-2722	
Public Health Emergency	(860) 509-8000	

Connecticut Poison Control Center

Phone 1-800-222-1222

SECTION III: APPENDICES

APPENDIX 6 – Hot/Cold Weather Operations Plans

Hot and Cold Weather Operations Plans are developed in accordance with regulatory requirements either mandated at the Federal or State level (NERC or local PUC requirements). These plans will be developed once the site has achieved Commercial Operation.

The facility's interior access roads shall be maintained to ensure accessibility to the site by emergency personnel, especially during inclement weather. Key Capture Energy shall ensure that snow removal is completed as soon as possible following a winter storm event. The rest of this section will not be applicable until the project is fully operational.

KCE CT 11
Emergency Management and
Public Safety Recommendations

General Security
The project will employ the use of a locked security fence and recording security cameras. The project will comply with the state compliance regulations as described in the Connecticut Siting Council *White Paper on the Security of Siting Energy Facilities* under *Compliance* on page 4. The approach to Battery Energy Storage System (BESS) project security is similar to methods employed for existing utility transmission substations.

System Monitoring and Detection
Once the Project is operational, it will be monitored 24/7 by a remote operations control center (ROCC). The Project will be equipped with Battery Management Software (BMS), informing automated systems and personnel through supervisory control and data acquisition (SCADA) systems. The BMS can disconnect the battery from the grid under certain conditions, as per the control system design. The first and most important line of defense for thermal runaway is the 24/7 ROCC monitoring using the BMS. The system is equipped to detect anomalies and ensure appropriate personnel are notified in response to an emergency condition. As needed, controls are designed to allow isolated modules, individual containers, or the full system to be shut down remotely.

The SolBank is equipped with smoke and heat detectors calibrated to detect early signs of fire within the SolBank. The spot-type smoke detector is calibrated to 3.5%/ft. The temperature threshold of the heat detector is 85℃. Both detectors are ceiling mounted. The SolBank contains both an audible fire alarm and visual fire strobe. If the smoke and heat detectors are triggered, both alarms will activate, and corresponding alarms will be sent to the ESS EMS.

In addition, each BESS container is equipped with:

- Fire Detection Heat and smoke detection – dual independent operation
    - Complete fire propagation verification from cell, module (pack) to unit level based on the latest UL 9540A: 2019 (4th Edition). Designed to meet the newest fire and safety codes globally.
    - Integrated multi-level fire detection, which detects and reports any fire incidents. Integrated E-STOP actions within the product and with other system equipment for immediate response.
- Gas Detection Combustible gas detection – dual independent operation
- Explosion Prevention & Mitigation
    - Explosion prevention with gas detection, NFPA69 rated active ventilation system with optional NPFA68 deflagration panels
- Fire Alarm
    - Local strobes and bells, remote to master panel and EMS
- UPS Backup
- Built in UPS for 24+ hrs backup for fire alarm, 2+ hrs backup for ventilation
- Local Emergency Stop
- Coolant Leak Detection
- Interface with External Fire Panel Optional ethernet or fiber networking

If any of the above detectors is triggered, the Fire Alarm Control Panel (FACP) will send signals to the central station associated with the FACP monitoring company and/or the ROCC or other appropriate entity in order to initiate the appropriate internal response. In addition, alarms requiring dispatch of the local fire department will immediately be relayed to the local Fire Department dispatch station.

Fire Response

Training for local emergency responders prior to systems operation will be provided with a full review of these systems and guidance for the appropriate approach and recommended response actions. Training will be provided prior to construction, prior to commissioning, and once more prior to operations. Please refer to the project's draft Emergency Response Plan. This plan has been shared with local responders with a request for questions and comments. Further coordination will continue with local responders as the project completes development and prepares for construction and operations.

Emergency response guidance for BESS facilities has been evolving with advances in safety testing, practices and lessons learned from operational experience. The protection of human life and surrounding structure/environment is of the highest importance. In concurrence with current industry guidance, KCE strongly recommends a containment strategy until any fire is exhausted while monitoring and protecting human life and nearby resources using water as a proactive cooling agent on the exterior of the surrounding battery containers, structures, and environment. This action should only be taken after clearance is authorized by appropriate KCE personnel. The system is designed to contain any incident to prevent spread to other portions of the system as demonstrated through equipment stress and fire testing.

Response recommendations include avoiding applying water directly to the exterior of an affected BESS container, as this provides little benefit for fire response and may result in undesired run-off.

Defensive firefighting tactics are recommended, with water being applied to the property outside the fence and surrounding structures. It is not recommended to apply water within the fenced facility for safety concerns and to avoid unnecessary runoff. However, water may be applied to nearby containers and other equipment for cooling, if necessary. Any hose line operations should be limited to hose and master stream application from outside of the project perimeter as far back as hose and stream ranges allow. The decision to provide thermal cooling via hose lines would only be made by the System Owner / Operator and any other required SMEs with consultation with the local emergency responders.

In all instances, power shut down and isolation involving any high voltage feeder lines must be confirmed before any defensive measures are taken involving application of water to the site.

Management of Gases

Each SolBank 3.0 unit is equipped with gas detection, NFPA69 rated active ventilation system with optional NPFA68 deflagration panels designed in accordance with NFPA 69 to remove gases from the container to prevent unsafe concentrations within the container. The SolBank is equipped with combustible gas detection sensor and two off-gassing valves. The combustible gas detector is calibrated to 10%-20% LEL. If the combustible gas sensor is triggered, both alarms will activate, and the two off-gassing valves will be opened for exhaust. Corresponding alarms will be sent to the EMS.

Management of Chemical Runoff

The SolBank 3.0 is an IP 55 rated container equipped with pressure differential and water sensors. These sensors will send a signal to the plant SCADA notifying operators of a leak. Operators can respond by following the site-specific plan which may include stopping the leaked system from operating until a technician can repair the leak and properly dispose of fluids on the bottom of the IP 55 container. The IP 55 container acts as a secondary containment system, holding up to 50 L of fluid.

The Project will be using the FP4200K series converter with pad-mounted Medium Voltage Transformers which are an oil-type transformer. These transformers use VG-100, a fully biodegradable dielectric fluid. Transformer documentation is included in Exhibit B- Equipment Specifications/VCC Instruction Manual_IEEE_EN_2022

Transformer Oil Information
Any VG-100 that infiltrates the soil onsite is biodegradable, non-hazardous, non-toxic, and will be cleaned up in accordance with the site specific SPCC Plan. Any VG-100 on impervious surfaces will be properly cleaned up in accordance with the site specific SPCC Plan. All soiled absorbent materials and collected VG-100 will be disposed of in accordance with all State and Federal regulations and the site-specific SPCC Plan.

Electric and Magnetic Fields (EMF)
BESS EMF emissions are expected to be similar to those of transmission substations with respect to 60-Hz magnetic fields; as such, the sources inside the BESS facility are not expected to be substantial sources of 60-Hz magnetic fields outside the facility. The transmission and distribution lines entering and exiting the facility are the dominant sources of EMF at the property line and beyond. In the case of the KCE CT 11 project, the generation tie line that is connecting the project to the point of interconnect on Salmon Brook St has the same 23kV rating as the existing roadside line and will not create any greater level of EMF than already exists at this location or across most areas of the state.

KCE CT 11 System Operations and Maintenance Plan

The System Operations and Maintenance (O&M) Plan is based on the Systems Manual from the battery equipment vendor, as well as general safety standards and industry best practices. The O&M plan will be compliant with all appropriate federal, state, and local laws and manufacturers' recommendations. Additionally, the Project O&M Plan will consolidate all necessary and prescribed maintenance schedules for all components in the system. The O&M of the BESS facility will be performed by a contracted third-party firm with expertise in BESS and overseen by Key Capture Energy's Operations & Maintenance team. The O&M for the generator tie-in will likely be performed by a contracted third-party firm with expertise in medium and high-voltage electrical systems. The KCE Operation & Maintenance Team works diligently to ensure that any equipment concerns are addressed quickly to minimize any downtime of the proposed Project Facilities to ensure that the Facilities continue to operate as expected.

Prior to beginning operation of the Project, the Operation & Maintenance Team will conduct training on system emergency procedures for the Town of Granby public safety personnel and first responders which will include information provided by the system manufacturer. Additionally, the Project will present the host municipalities with a facility equipment layout plan at project completion.

The Project is monitored 24/7 by a remote operations control center (ROCC). The Project will be equipped with Battery Management Software (BMS), informing automated procedures and personnel through supervisory control and data acquisition (SCADA) systems. The BMS continuously monitors a number of battery system data points including, but not limited to, voltage, current, and temperature. The ROCC continuously monitors the SCADA systems, with appropriate notifications made to the required entities to ensure any issue is dealt with both safely and timely in the event of an abnormal data point. Local emergency services will also be notified in the event of a fire alarm at the BESS. The system can shut down the BESS and disconnect the battery racks from the inverters in an emergency. The ROCC would notify all required entities which would allow Eversource to (1) disconnect the project from the local distribution network remotely and (2) dispatch a line crew to the site. Only upon a KCE representative deeming the site safe to enter would anyone be allowed inside the fence. A site-level fire panel also aggregates data from each of the battery containers for review of any on-site responders.

During the operational period, the access road shall be maintained and cleared of snow on an as needed basis to allow access to the site.

During operations, the planned maintenance schedules will include work for preventative maintenance, inspections, and any other work able to be planned in advance. All work will be completed in accordance with the manufacturers' recommendation as well as all safety and industry best practices. Maintenance records will be maintained and recorded for all preventative and reactive maintenance performed on the system. This may include but not be limited to:

- General facility inspection and maintenance
- BESS preventative maintenance
- Power conversion system (inverter) preventative maintenance
- Switchgear/medium voltage equipment preventative maintenance
- Medium-Voltage Vacuum CB preventative inspection
- Fire suppression system testing, inspections, and preventative maintenance

Please note that all items referenced herein are contingent on completion of the detailed construction engineering to be finalized after receipt of all approvals. As such, the System Operations and Maintenance Plan is anticipated to be finalized in Q4, 2024. KCE and their suppliers/contractors shall maintain industry best practices as it relates to the construction, commissioning, and operation of the project and will work closely with the integrator to ensure that proper testing is done.

U.S. ENVIRONMENTAL PROTECTION AGENCY
TIER I QUALIFIED FACILITY SPCC PLAN TEMPLATE

Instructions to Complete this Template

This template is intended to help the owner or operator of a Tier I qualified facility develop a self-certified Spill Prevention, Control, and Countermeasure (SPCC) Plan. To use this template, your facility must meet all of the applicability criteria of a Tier I qualified facility listed under §112.3(g)(1) of the SPCC rule. This template provides every SPCC rule requirement necessary for a Tier I qualified facility, which you must address and implement.

You may use this template to comply with the SPCC regulation or use it as a model and modify it as necessary to meet your facility-specific needs. If you modify the template, your Plan must include a section cross-referencing the location of each applicable requirement of the SPCC rule and you must ensure that your Plan is an equivalent Plan that meets all applicable rule requirements of 40 CFR 112.6(a)(3).

You may complete this template either electronically or by hand on a printed copy. This document is a reformatted version of the template found in Appendix G of 40 CFR part 112.[a] No substantive changes have been made. Please note that a "Not Applicable" ("N/A") column has been added to both Table G-10 (General Rule Requirements for Onshore Facilities) and Table G-11 (General Rule Requirements for Onshore Oil Production Facilities). The "N/A" column should help you complete your self-certification when a required rule element does not apply to your facility. Use of the "N/A" column is optional and is not required by rule.

All Tier I qualified facility self-certifiers must complete Sections I, II, and III. Additionally, the owner or operator of an:

- Onshore facility (excluding production) must complete Section A.
- Onshore oil production facility (excluding drilling and workover facilities) must complete Section B.
- Onshore oil drilling and workover facility must complete Section C.

Complete and include with your Plan the appropriate attachments. You should consider printing copies of the attachments for use in implementing the SPCC Plan (e.g. Attachment 3.1 - Inspection Log & Schedule; Attachment 4 - Discharge Notification Form).

To complete the template, check the box next to the requirement to indicate that it has been adequately addressed. Either write “N/A” in the column or check the box under the “N/A” column to indicate those requirements that are not applicable to the facility. Where a section requires a description or listing, write in the spaces provided (or attach additional descriptions if more space is needed).

Below is a key for the colors used in the section headers:

Sections I, II, and III: Required for all Tier I qualified facilities
Section A: Onshore facilities (excluding production)
Section B: Onshore oil production facilities (excluding drilling and workover facilities)
Section C: Onshore oil drilling and workover facilities
Attachments: 1 - Five Year Review and Technical Amendment Logs 2 - Oil Spill Contingency Plan and Checklist 3 - Inspections, Dike Drainage and Personnel Training Logs 4 - Discharge Notification Form

After you have completed all appropriate sections, certify and date your Plan, and then implement it by the compliance date. If your facility was in operation before August 16, 2002, and you do not already have a Plan, then implement this template immediately. Conduct inspections and tests in accordance with the written procedures that you have developed for your facility. You must keep with the SPCC Plan a record of these inspections and tests, signed by the appropriate supervisor or inspector, for a period of three years.

Do not forget to periodically review your Plan (at least once every five years) or to update it when you make changes to your facility. You must prepare amendments within six months of the facility change, and implement them as soon as possible, but not later than six months following preparation of any amendment.

In the event that your facility releases oil to navigable waters or adjoining shorelines, immediately call the National Response Center (NRC) at 1-800-424-8802. The NRC is the federal government's centralized reporting center, which is staffed 24 hours per day by U.S. Coast Guard personnel.

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[a] Please note that the use of this template is not mandatory for a Tier I qualified facility. You may also meet the SPCC Plan requirement by preparing a satisfactory Tier II qualified facility Plan, preparing a satisfactory Plan that is certified by a Professional Engineer, or by developing an equivalent Plan for a Tier I qualified facility. Further information on the requirements of these methods can be found in 40 CFR part 112.6(a)(1). If you use any of these alternative methods you must include a cross reference in your Plan that shows how the equivalent Plan meets all applicable 40 CFR part 112 requirements.

Tier I Qualified Facility SPCC Plan

This template constitutes the SPCC Plan for the facility, when completed and signed by the owner or operator of a facility that meets the applicability criteria in §112.3(g)(1). This template addresses the requirements of 40 CFR part 112. Maintain a complete copy of the Plan at the facility if the facility is normally attended at least four hours per day, or for a facility attended fewer than four hours per day, at the nearest field office. When making operational changes at a facility that are necessary to comply with the rule requirements, the owner/operator should follow state and local requirements (such as for permitting, design and construction) and obtain professional assistance, as appropriate.

Facility Description

Facility Name: KCE CT 1, LLC

Facility Address: 100 Salmon Brook St

City: Granby State: CT ZIP: 06035

County: Harford Tel. Number: ( ) - TBD

Owner or Operator Name: KCE CT 11, LLC

Owner or Operator Address: 25 Monroe St

City: Albany State: NY ZIP: 12210

County: Albany Tel. Number: (516) 279 - 2955

I. Self-Certification Statement (§112.6(a)(1))

The owner or operator of a facility certifies that each of the following is true in order to utilize this template to comply with the SPCC requirements:

I _____ certify that the following is accurate:

1. I am familiar with the applicable requirements of 40 CFR part 112;
2. I have visited and examined the facility;
3. This Plan was prepared in accordance with accepted and sound industry practices and standards;
4. Procedures for required inspections and testing have been established in accordance with industry inspection and testing standards or recommended practices;
5. I will fully implement the Plan;
6. This facility meets the following qualification criteria (under §112.3(g)(1)):
    a. The aggregate aboveground oil storage capacity of the facility is 10,000 U.S. gallons or less; and
    b. The facility has had no single discharge as described in §112.1(b) exceeding 1,000 U.S. gallons and no two discharges as described in §112.1(b) each exceeding 42 U.S. gallons within any twelve month period in the three years prior to the SPCC Plan self-certification date, or since becoming subject to 40 CFR part 112 if the facility has been in operation for less than three years (not including oil discharges as described in §112.1(b) that are the result of natural disasters, acts of war, or terrorism); and
    c. There is no individual oil storage container at the facility with an aboveground capacity greater than 5,000 U.S. gallons.
7. This Plan does not deviate from any requirement of 40 CFR part 112 as allowed by §112.7(a)(2) (environmental equivalence) and §112.7(d) (impracticability of secondary containment) or include any measures pursuant to §112.9(c)(6) for produced water containers and any associated piping;
8. This Plan and individual(s) responsible for implementing this Plan have the full approval of management and I have committed the necessary resources to fully implement this Plan.

I also understand my other obligations relating to the storage of oil at this facility, including, among others:

1. To report any oil discharge to navigable waters or adjoining shorelines to the appropriate authorities. Notification information is included in this Plan.
2. To review and amend this Plan whenever there is a material change at the facility that affects the potential for an oil discharge, and at least once every five years. Reviews and amendments are recorded in an attached log [See Five Year Review Log and Technical Amendment Log in Attachments 1.1 and 1.2.]
3. Optional use of a contingency plan. A contingency plan:
    a. May be used in lieu of secondary containment for qualified oil-filled operational equipment, in accordance with the requirements under §112.7(k), and;
    b. Must be prepared for flowlines and/or intra-facility gathering lines which do not have secondary containment at an oil production facility, and;
    c. Must include an established and documented inspection or monitoring program; must follow the provisions of 40 CFR part 109; and must include a written commitment of manpower, equipment and materials to expeditiously remove any quantity of oil discharged that may be harmful. If applicable, a copy of the contingency plan and any additional documentation will be attached to this Plan as Attachment 2.

I certify that I have satisfied the requirement to prepare and implement a Plan under §112.3 and all of the requirements under §112.6(a). I certify that the information contained in this Plan is true.

Signature _____ Title: _____

Name _____ Date: / / 20

II. Record of Plan Review and Amendments

Five Year Review (§112.5(b)):

Complete a review and evaluation of this SPCC Plan at least once every five years. As a result of the review, amend this Plan within six months to include more effective prevention and control measures for the facility**,** if applicable. Implement any SPCC Plan amendment as soon as possible**,** but no later than six months following Plan amendment. Document completion of the review and evaluation, and complete the Five Year Review Log in Attachment 1.1. If the facility no longer meets Tier I qualified facility eligibility, the owner or operator must revise the Plan to meet Tier II qualified facility requirements, or complete a full PE certified Plan.

Table G-1 Technical Amendments (§§112.5(a), (c) and 112.6(a)(2))	
This SPCC Plan will be amended when there is a change in the facility design, construction, operation, or maintenance that materially affects the potential for a discharge to navigable waters or adjoining shorelines. Examples include adding or removing containers, reconstruction, replacement, or installation of piping systems, changes to secondary containment systems, changes in product stored at this facility, or revisions to standard operating procedures.	☒
Any technical amendments to this Plan will be re-certified in accordance with Section I of this Plan template. *[§112.6(a)(2)]* **[See Technical Amendment Log in Attachment 1.2]**	☒

III. Plan Requirements

1. Oil Storage Containers (§112.7(a)(3)(i)):

Table G-2 Oil Storage Containers and Capacities	
This table includes a complete list of all oil storage containers (aboveground containers[a] and completely buried tanks[b]) with capacity of 55 U.S. gallons or more, unless otherwise exempt from the rule. For mobile/portable containers, an estimated number of containers, types of oil, and anticipated capacities are provided.	☐

Oil Storage Container *(indicate whether aboveground (A) or completely buried (B))*	**Type of Oil**	**Shell Capacity (gallons)**
Medium Voltage Transformer #1 (A)	VG-100, a fully biodegradable dielectric fluid	660.43
Medium Voltage Transformer #2 (A)	VG-100, a fully biodegradable dielectric fluid	660.43
Auxiliary transformer (A)	VG-100, a fully biodegradable dielectric fluid	607

Total Aboveground Storage Capacity [c] 1927.86 gallons
Total Completely Buried Storage Capacity 0 gallons
Facility Total Oil Storage Capacity 1927.86 gallons

[a] Aboveground storage containers that must be included when calculating total facility oil storage capacity include: tanks and mobile or portable containers; oil-filled operational equipment (e.g. transformers); other oil-filled equipment**,** such as flow-through process equipment. Exempt containers that are not included in the capacity calculation include: any container with a storage capacity of less than 55 gallons of oil; containers used exclusively for wastewater treatment; permanently closed containers; motive power containers; hot-mix asphalt containers; heating oil containers used solely at a single-family residence; and pesticide application equipment or related mix containers.

[b] Although the criteria to determine eligibility for qualified facilities focuses on the aboveground oil storage containers at the facility, the completely buried tanks at a qualified facility are still subject to the rule requirements and must be addressed in the template; however, they are not counted toward the qualified facility applicability threshold.

[c] Counts toward qualified facility applicability threshold.

2. Secondary Containment and Oil Spill Control (§§112.6(a)(3)(i) and (ii), 112.7(c) and 112.9(c)(2)):

Table G-3 Secondary Containment and Oil Spill Control	
Appropriate secondary containment and/or diversionary structures or equipment[a] is provided for all oil handling containers, equipment, and transfer areas to prevent a discharge to navigable waters or adjoining shorelines. The entire secondary containment system, including walls and floor, is capable of containing oil and is constructed so that any discharge from a primary containment system, such as a tank or pipe, will not escape the containment system before cleanup occurs.	☐

[a] Use one of the following methods of secondary containment or its equivalent: (1) Dikes, berms, or retaining walls sufficiently impervious to contain oil; (2) Curbing; (3) Culverting, gutters, or other drainage systems; (4) Weirs, booms, or other barriers; (5) Spill

diversion ponds; (6) Retention ponds; or (7) Sorbent materials.

Table G-4 below identifies the tanks and containers at the facility with the potential for an oil discharge; the mode of failure; the flow direction and potential quantity of the discharge; and the secondary containment method and containment capacity that is provided.

Table G-4 Containers with Potential for an Oil Discharge

Area	Type of failure (discharge scenario)	Potential discharge volume (gallons)	Direction of flow for uncontained discharge	Secondary containment method[a]	Secondary containment capacity (gallons)
Bulk Storage Containers and Mobile/Portable Containers[b]					
Oil-filled Operational Equipment (e.g., hydraulic equipment, transformers)[c]					
Medium Voltage Transformer	Equipment seal failures	660	south	Sorbent materials	
Medium Voltage Transformer	Equipment seal failures	660	south	Sorbent materials	
Auxillary Transformer	Equipment seal failures	607	south	Sorbent materials	
Piping, Valves, etc.					
Product Transfer Areas (location where oil is loaded to or from a container, pipe or other piece of equipment.)					
Other Oil-Handling Areas or Oil-Filled Equipment (e.g. flow-through process vessels at an oil production facility)					

[a] Use one of the following methods of secondary containment or its equivalent: (1) Dikes, berms, or retaining walls sufficiently impervious to contain oil; (2) Curbing; (3) Culverting, gutters, or other drainage systems; (4) Weirs, booms, or other barriers; (5) Spill diversion ponds; (6) Retention ponds; or (7) Sorbent materials.

[b] For storage tanks and bulk storage containers, the secondary containment capacity must be at least the capacity of the largest container plus additional capacity to contain rainfall or other precipitation.

[c] For oil-filled operational equipment: Document in the table above if alternative measures to secondary containment (as described in §112.7(k)) are implemented at the facility.

3. Inspections, Testing, Recordkeeping and Personnel Training (§§112.7(e) and (f), 112.8(c)(6) and (d)(4), 112.9(c)(3), 112.12(c)(6) and (d)(4)):

Table G-5 Inspections, Testing, Recordkeeping and Personnel Training	
An inspection and/or testing program is implemented for all aboveground bulk storage containers and piping at this facility. *[§§112.8(c)(6) and (d)(4), 112.9(c)(3), 112.12(c)(6) and (d)(4)]*	☒
The following is a description of the inspection and/or testing program (e.g. reference to industry standard utilized, scope, frequency, method of inspection or test, and person conducting the inspection) for all aboveground bulk storage containers and piping at this facility: Routine Inspections Periodic (at least quarterly) and Annual inspections are to be performed using forms in the Appendices of this plan or other appropriate written or electronic inspection documents. The Facility owner/operator will perform frequent informal inspections by conducting a walk- through of the Facility, checking the following: • Visually inspecting general area of the Facility for any indications of leaks. • Visually inspecting oil-filled electrical equipment for indications of leaks or spills. • Visually inspecting oil-filled electrical equipment for defects that may result in a release of oil. • Visually inspecting Facility fencing, gates, and access points to ensure proper security is maintained. Any issues or concerns identified during routine inspections must be mitigated or corrected promptly. Contact the Facility's Operations & Maintenance team to report unsafe conditions or if there appears to be a potential for an oil release. Oil-Filled Electrical Equipment General containment for the Facility's oil-filled operational equipment is provided by active containment via the application of sorbent materials as well as the implementation of an oil spill contingency plan and a written commitment of manpower equipment and materials. In general, the owner or operator of the Facility will implement the following procedures as active secondary containment. • Periodically and on a regular schedule visually inspect and/or test oil-filled electrical equipment and associated component for leaks, corrosion, or other conditions that could lead to a discharge, • Take corrective action or make repairs to equipment and any associated components as indicated by regularly scheduled visual inspections, tests, or evidence of an oil discharge, • Promptly initiate actions to contain, remove and remediate oil discharges, and • If the Facility discharges more than 1,000 U.S. gallons of oil in a single discharge, or discharges more than 42 U.S. gallons of oil in each of two discharges within any twelve- month period, (excluding discharges that are the result of natural disasters, acts of war, or terrorism) then, within six months of the discharge at the Facility, ensure that all oil-filled electrical equipment have secondary containment	
Inspections, tests, and records are conducted in accordance with written procedures developed for the facility. Records of inspections and tests kept under usual and customary business practices will suffice for purposes of this paragraph. *[§112.7(e)]*	☒
A record of the inspections and tests are kept at the facility or with the SPCC Plan for a period of three years. *[§112.7(e)]* **[See Inspection Log and Schedule in Attachment 3.1]**	☒
Inspections and tests are signed by the appropriate supervisor or inspector. *[§112.7(e)]*	☒
Personnel, training, and discharge prevention procedures [§112.7(f)]	
Oil-handling personnel are trained in the operation and maintenance of equipment to prevent discharges; discharge procedure protocols; applicable pollution control laws, rules, and regulations; general facility operations; and, the contents of the facility SPCC Plan. *[§112.7(f)]*	☒
A person who reports to facility management is designated and accountable for discharge prevention. *[§112.7(f)]* Name/Title: TBD	☒
Discharge prevention briefings are conducted for oil-handling personnel annually to assure adequate understanding of the SPCC Plan for that facility. Such briefings highlight and describe past reportable discharges or failures, malfunctioning components, and any recently developed precautionary measures. *[§112.7(f)]* **[See Oil-handling Personnel Training and Briefing Log in Attachment 3.4]**	☒

4. Security (excluding oil production facilities) §112.7(g):

Table G-6 Implementation and Description of Security Measures	
Security measures are implemented at this facility to prevent unauthorized access to oil handling, processing, and storage area.	☒

The following is a description of how you secure and control access to the oil handling, processing and storage areas; secure master flow and drain valves; prevent unauthorized access to starter controls on oil pumps; secure out-of-service and loading/unloading connections of oil pipelines; address the appropriateness of security lighting to both prevent acts of vandalism and assist in the discovery of oil discharges:

The following security measures are provided for the Facility:

- Controlled access to the interior of the Facility via chain-link fencing and locking gates.
- Controlled access to oil-filled components of electrical transformers via locked exterior metal casings.
- Facility lighting which reduces the potential for acts of vandalism and assists in the discovery/prevention of oil discharges.

5. Emergency Procedures and Notifications (§112.7(a)(3)(iv) and 112.7(a)(5)):

Table G-7 Description of Emergency Procedures and Notifications

The following is a description of the immediate actions to be taken by facility personnel in the event of a discharge to navigable waters or adjoining shorelines *[§112.7(a)(3)(iv) and 112.7(a)(5)]*:

Additional procedures, and notification information will be added to this plan prior to start of project construction anticipated Q4 2024. All sections with noted TBD will be completed prior to that time.

- In the event of an emergency call 911.
- If there is not an emergency, contact the company contacts and, when applicable, the clean-up contractors.
- If the spill threatens to impact water or results in a sheen on water, then contact the National Response Center.
- If the spill is greater than 25 gallons, notify the CT DEEP.
- If the spill is greater than 1,000 gallons or is the second release of greater than 42 gallons within a 12 – month period, then a written notification to the EPA Regional Administrator is required within 60days of the spill.

Disallow anyone from entering or accessing the spill area. Using banner tape or emergency response agencies will help accomplish this. This can be accomplished through placards, shipping papers, labels, inventory records or Safety Data Sheets (Global Harmonization).
Plan offensive mitigation action.
Select personal protective equipment based on hazards presented and as directed in the Safety Data Sheets for the spilled material.
Eliminate ignition sources.
Contain spilled fluids to prevent further spread. If necessary, temporary dikes and emergency pits can be utilized.
Facility Management will establish and provide an adequate level of decontamination.
Facility Management will ensure appropriate disposal of all recovered fluids and contaminated soil.
Conduct emergency-phase closure, if applicable, equipment status evaluation, personnel debriefing, and assignments for post-incident analysis.
Document any exposures to personnel. If necessary, perform medical evaluations following the guidance of Safety Data Sheets.
Facility Management will schedule a post-incident analysis within 48 hours and inform all personnel involved.

DISCHARGE PREVENTION

Discharge Prevention Measures

Periodic inspections are the main discharge prevention measures. Proper operation and maintenance of Facility equipment is also a major part of discharge prevention at the Facility. Employee training and a company culture of safe work practices complete the most important portions of the Facility discharge prevention measures.

Controls and Countermeasures

In the event of a discharge, discovery would be made by Facility representatives during a routine visit to the Facility. Base material or dirt that covers the ground at the Facility will contain or absorb small spills. The Facility representatives will take appropriate cleanup measures to promptly remove or remediate oil impacted media present on the ground or in containment structures. The designated spill response contractor(s) will conduct response and cleanup of any discharges that leave Facility boundaries or exceed the capability of Facility personnel and equipment. In the event of a spill, corrective actions and/or countermeasures will also be implemented, where appropriate, to prevent future occurrences of spills. Corrective actions will be documented within a report generated and maintained within the Facility records.

Discharge Prediction

The Facility is located on relatively level terrain in a rural area. In the unlikely event of a total release of oil from one of the Facility's oil-filled electrical transformers, the oil would flow to the southwest across the Facility.

Potential releases of oil may be caused by rupture or leakage of equipment due to vandalism, natural disaster, or equipment failure. Because of the spill prevention measures described in this plan, the probability of a spill or release of oil to navigable waters is extremely low.

Given the facility's current spill prevention program (e.g., management practices, and inspection practices), it appears that a natural disaster would be the most likely cause of a major release.

6. Contact List (§112.7(a)(3)(vi)):

Table G-8 Contact List	
Contact Organization / Person	**Telephone Number**
National Response Center (NRC)	1-800-424-8802
Cleanup Contractor(s) TBD	TBD
Key Facility Personnel	
Designated Person Accountable for Discharge Prevention: TBD	Office: TBD
	Emergency: TBD
	Office:
	Emergency:
	Office:
	Emergency:
	Office:
	Emergency:
State Oil Pollution Control Agencies Connecticut Department of Energy & Environmental Protection Connecticut Poison Control Center	(860) 424-3000 1-800-222-1222
Other State, Federal, and Local Agencies Town of Windsor Locks Emergency Services Dispatch	860-627-1461
Local Fire Department Windsor Locks Fire Department	860-627-1468
Local Police Department Windsor Locks Police Department	860-627-1461
Hospital Hartford Hospital- Emergency	860-545-5000

Other Contact References (e.g., downstream water intakes or neighboring facilities)	

7. NRC Notification Procedure (§112.7(a)(4) and (a)(5)):

Table G-9 NRC Notification Procedure	
In the event of a discharge of oil to navigable waters or adjoining shorelines, the following information identified in Attachment 4 will be provided to the National Response Center immediately following identification of a discharge to navigable waters or adjoining shorelines **[See Discharge Notification Form in Attachment 4]**: *[§112.7(a)(4)]*	☐
• The exact address or location and phone number of the facility; • Date and time of the discharge; • Type of material discharged; • Estimate of the total quantity discharged; • Estimate of the quantity discharged to navigable waters; • Source of the discharge; • Description of all affected media; • Cause of the discharge; • Any damages or injuries caused by the discharge; • Actions being used to stop, remove, and mitigate the effects of the discharge; • Whether an evacuation may be needed; and • Names of individuals and/or organizations who have also been contacted.	

8. SPCC Spill Reporting Requirements (Report within 60 days) (§112.4):

Submit information to the EPA Regional Administrator (RA) and the appropriate agency or agencies in charge of oil pollution control activities in the State in which the facility is located within 60 days from one of the following discharge events:

A single discharge of more than 1,000 U.S. gallons of oil to navigable waters or adjoining shorelines or
Two discharges to navigable waters or adjoining shorelines each more than 42 U.S. gallons of oil occurring within any twelve month period

You must submit the following information to the RA:

(1) Name of the facility;
(2) Your name;
(3) Location of the facility;
(4) Maximum storage or handling capacity of the facility and normal daily throughput;
(5) Corrective action and countermeasures you have taken, including a description of equipment repairs and replacements;
(6) An adequate description of the facility, including maps, flow diagrams, and topographical maps, as necessary;
(7) The cause of the reportable discharge, including a failure analysis of the system or subsystem in which the failure occurred; and
(8) Additional preventive measures you have taken or contemplated to minimize the possibility of recurrence
(9) Such other information as the Regional Administrator may reasonably require pertinent to the Plan or discharge

* * * * *

NOTE: Complete one of the following sections (A, B or C) as appropriate for the facility type.

A. Onshore Facilities (excluding production) (§§112.8(b) through (d), 112.12(b) through (d)):

The owner or operator must meet the general rule requirements as well as requirements under this section. Note that not all provisions may be applicable to all owners/operators. For example, a facility may not maintain completely buried metallic storage tanks installed after January 10, 1974, and thus would not have to abide by requirements in §§112.8(c)(4) and 112.12(c)(4), listed below. **In cases where a provision is not applicable, write "N/A".**

Table G-10 General Rule Requirements for Onshore Facilities		N/A
Drainage from diked storage areas is restrained by valves to prevent a discharge into the drainage system or facility effluent treatment system, except where facility systems are designed to control such discharge. Diked areas may be emptied by pumps or ejectors that must be manually activated after inspecting the condition of the accumulation to ensure no oil will be discharged. *[§§112.8(b)(1) and 112.12(b)(1)]*	☐	☒
Valves of manual, open-and-closed design are used for the drainage of diked areas. *[§§112.8(b)(2) and 112.12(b)(2)]*	☐	☒
The containers at the facility are compatible with materials stored and conditions of storage such as pressure and temperature. *[§§112.8(c)(1) and 112.12(c)(1)]*	☒	☐
Secondary containment for the bulk storage containers (including mobile/portable oil storage containers) holds the capacity of the largest container plus additional capacity to contain precipitation. Mobile or portable oil storage containers are positioned to prevent a discharge as described in §112.1(b). *[§112.6(a)(3)(ii)]*	☐	☒
If uncontaminated rainwater from diked areas drains into a storm drain or open watercourse the following procedures will be implemented at the facility: *[§§112.8(c)(3) and 112.12(c)(3)]*		
• Bypass valve is normally sealed closed	☐	☒
• Retained rainwater is inspected to ensure that its presence will not cause a discharge to navigable waters or adjoining shorelines	☐	☒
• Bypass valve is opened and resealed under responsible supervision	☐	☒
• Adequate records of drainage are kept **[See Dike Drainage Log in Attachment 3.3]**	☐	☒
For completely buried metallic tanks installed on or after January 10, 1974 at this facility *[§§112.8(c)(4) and 112.12(c)(4)]*:		
• Tanks have corrosion protection with coatings or cathodic protection compatible with local soil conditions.	☐	☒
• Regular leak testing is conducted.	☐	☒
For partially buried or bunkered metallic tanks *[§112.8(c)(5) and §112.12(c)(5)]*:		
• Tanks have corrosion protection with coatings or cathodic protection compatible with local soil conditions.	☐	☒
Each aboveground bulk container is tested or inspected for integrity on a regular schedule and whenever material repairs are made. Scope and frequency of the inspections and inspector qualifications are in accordance with industry standards. Container supports and foundations are regularly inspected. **[See Inspection Log and Schedule and Bulk Storage Container Inspection Schedule in Attachments 3.1 and 3.2]** *[§112.8(c)(6) and §112.12(c)(6)(i)]*	☒	☐
Outsides of bulk storage containers are frequently inspected for signs of deterioration, discharges, or accumulation of oil inside diked areas. **[See Inspection Log and Schedule in Attachment 3.1]** *[§§112.8(c)(6) and 112.12(c)(6)]*	☒	☐
For bulk storage containers that are subject to 21 CFR part 110 which are shop-fabricated, constructed of austenitic stainless steel, elevated and have no external insulation, formal visual inspection is conducted on a regular schedule. Appropriate qualifications for personnel performing tests and inspections are documented. **[See Inspection Log and Schedule and Bulk Storage Container Inspection Schedule in Attachments 3.1 and 3.2]** *[§112.12(c)(6)(ii)]*	☒	☐

Table G-10 General Rule Requirements for Onshore Facilities		N/A
Each container is provided with a system or documented procedure to prevent overfills for the container. Describe:	☐	☒
Liquid level sensing devices are regularly tested to ensure proper operation **[See Inspection Log and Schedule in Attachment 3.1]**. *[§112.6(a)(3)(iii)]*	☒	☐
Visible discharges which result in a loss of oil from the container, including but not limited to seams, gaskets, piping, pumps, valves, rivets, and bolts are promptly corrected and oil in diked areas is promptly removed. *[§§112.8(c)(10) and 112.12(c)(10)]*	☒	☐
Aboveground valves, piping, and appurtenances such as flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces are inspected regularly. **[See Inspection Log and Schedule in Attachment 3.1]** *[§§112.8(d)(4) and 112.12(d)(4)]*	☒	☐
Integrity and leak testing are conducted on buried piping at the time of installation, modification, construction, relocation, or replacement. **[See Inspection Log and Schedule in Attachment 3.1]** *[§§112.8(d)(4) and 112.12(d)(4)]*	☐	☒

B. Onshore Oil Production Facilities (excluding drilling and workover facilities) (§112.9(b), (c), and (d)):

The owner or operator must meet the general rule requirements as well as the requirements under this section. Note that not all provisions may be applicable to all owners/operators. **In cases where a provision is not applicable, write "N/A".**

Table G-11 General Rule Requirements for Onshore Oil Production Facilities		N/A
At tank batteries, separation and treating areas, drainage is closed and sealed except when draining uncontaminated rainwater. Accumulated oil on the rainwater is returned to storage or disposed of in accordance with legally approved methods. *[§112.9(b)(1)]*	☐	☐
Prior to drainage, diked areas are inspected and *[§112.9(b)(1)]*: • Retained rainwater is inspected to ensure that its presence will not cause a discharge to navigable waters • Bypass valve is opened and resealed under responsible supervision • Adequate records of drainage are kept **[See Dike Drainage Log in Attachment 3.3]**	☐ ☐ ☐	☐ ☐ ☐
Field drainage systems and oil traps, sumps, or skimmers are inspected at regularly scheduled intervals for oil, and accumulations of oil are promptly removed **[See Inspection Log and Schedule in Attachment 3.1]** *[§112.9(b)(2)]*	☐	☐
The containers used at this facility are compatible with materials stored and conditions of storage. *[§112.9(c)(1)]*	☐	☐
All tank battery, separation, and treating facility installations (except for flow-through process vessels) are constructed with a capacity to hold the largest single container plus additional capacity to contain rainfall. Drainage from undiked areas is safely confined in a catchment basin or holding pond. *[§112.9(c)(2)]*	☐	☐
Except for flow-through process vessels, containers that are on or above the surface of the ground, including foundations and supports, are visually inspected for deterioration and maintenance needs on a regular schedule. **[See Inspection Log and Schedule in Attachment 3.1]** *[§112.9(c)(3)]*	☐	☐
New and old tank batteries at this facility are engineered/updated in accordance with good engineering practices to prevent discharges including at least one of the following: i. adequate container capacity to prevent overfill if regular pumping/gauging is delayed; ii. overflow equalizing lines between containers so that a full container can overflow to an adjacent container; iii. vacuum protection to prevent container collapse; or iv. high level sensors to generate and transmit an alarm to the computer where the facility is subject to a computer production control system. *[§112.9(c)(4)]*	☐	☐
Flow-through process vessels and associated components are: • Are constructed with a capacity to hold the largest single container plus additional capacity to contain rainfall. Drainage from undiked areas is safely confined in a catchment basin or holding pond; *[§112.9(c)(2)]* and • That are on or above the surface of the ground, including foundations and supports, are visually inspected for deterioration and maintenance needs on a regular schedule. **[See Inspection Log and Schedule in Attachment 3.1]** *[§112.9(c)(3)]* *Or* • Visually inspected and/or tested periodically and on a regular schedule for leaks, corrosion, or other conditions that could lead to a discharge to navigable waters; and • Corrective action or repairs are applied to flow-through process vessels and any associated components as indicated by regularly scheduled visual inspections, tests, or evidence of an oil discharge; and • Any accumulations of oil discharges associated with flow-through process vessels are promptly removed; and • Flow-through process vessels are provided with a secondary means of containment for the entire capacity of the largest single container and sufficient freeboard to contain precipitation within six months of a discharge from flow-through process vessels of more than 1,000 U.S. gallons of oil in a single discharge as described in §112.1(b), or a discharge more than 42 U.S. gallons of oil in each of two discharges as described in §112.1(b) within any twelve month period. *[§112.9(c)(5)]* *(Leave blank until such time that this provision is applicable.)*	☐ ☐ ☐ ☐ ☐ ☐	☐ ☐ ☐ ☐ ☐ ☐

Table G-11 General Rule Requirements for Onshore Oil Production Facilities		N/A
All aboveground valves and piping associated with transfer operations are inspected periodically and upon a regular schedule. The general condition of flange joints, valve glands and bodies, drip pans, pipe supports, pumping well polish rod stuffing boxes, bleeder and gauge valves, and other such items are included in the inspection. **[See Inspection Log and Schedule in Attachment 3.1]** *[§112.9(d)(1)]*	☐	☐
An oil spill contingency plan and written commitment of resources are provided for flowlines and intra-facility gathering lines **[See Oil Spill Contingency Plan and Checklist in Attachment 2 and Inspection Log and Schedule in Attachment 3.1]** *[§112.9(d)(3)]* or Appropriate secondary containment and/or diversionary structures or equipment is provided for flowlines and intra-facility gathering lines to prevent a discharge to navigable waters or adjoining shorelines. The entire secondary containment system, including walls and floor, is capable of containing oil and is constructed so that any discharge from the pipe, will not escape the containment system before cleanup occurs.	☐ ☐	☐ ☐
A flowline/intra-facility gathering line maintenance program to prevent discharges from each flowline has been established at this facility. The maintenance program addresses each of the following: • Flowlines and intra-facility gathering lines and associated valves and equipment are compatible with the type of production fluids, their potential corrosivity, volume, and pressure, and other conditions expected in the operational environment; • Flowlines, intra-facility gathering lines and associated appurtenances are visually inspected and/or tested on a periodic and regular schedule for leaks, oil discharges, corrosion, or other conditions that could lead to a discharge as described in §112.1(b). The frequency and type of testing allows for the implementation of a contingency plan as described under part 109 of this chapter. • Corrective action and repairs to any flowlines and intra-facility gathering lines and associated appurtenances as indicated by regularly scheduled visual inspections, tests, or evidence of a discharge. • Accumulations of oil discharges associated with flowlines, intra-facility gathering lines, and associated appurtenances are promptly removed. *[§112.9(d)(4)]*	☐ ☐ ☐ ☐	☐ ☐ ☐ ☐
The following is a description of the flowline/intra-facility gathering line maintenance program implemented at this facility:		

C. Onshore Oil Drilling and Workover Facilities (§112.10(b), (c) and (d)):

The owner or operator must meet the general rule requirements as well as the requirements under this section.

Table G-12 General Rule Requirements for Onshore Oil Drilling and Workover Facilities	
Mobile drilling or worker equipment is positioned or located to prevent discharge as described in §112.1(b). *[§112.10(b)]*	☐
Catchment basins or diversion structures are provided to intercept and contain discharges of fuel, crude oil, or oily drilling fluids. *[§112.10(c)]*	☐
A blowout prevention (BOP) assembly and well control system was installed before drilling below any casing string or during workover operations. *[§112.10(d)]*	☐
The BOP assembly and well control system is capable of controlling any well-head pressure that may be encountered while the BOP assembly and well control system are on the well. *[§112.10(d)]*	☐

ATTACHMENT 1 – Five Year Review and Technical Amendment Logs

ATTACHMENT 1.1 – Five Year Review Log

I have completed a review and evaluation of the SPCC Plan for this facility, and will/will not amend this Plan as a result.

Table G-13 Review and Evaluation of SPCC Plan for Facility			
Review Date	Plan Amendment		Name and signature of person authorized to review this Plan
	Will Amend	Will Not Amend	
	☐	☐	
	☐	☐	
	☐	☐	
	☐	☐	
	☐	☐	
	☐	☐	
	☐	☐	
	☐	☐	
	☐	☐	
	☐	☐	
	☐	☐	
	☐	☐	
	☐	☐	
	☐	☐	

ATTACHMENT 1.2 – Technical Amendment Log

Any technical amendments to this Plan will be re-certified in accordance with Section I of this Plan template.

Table G-15 Description and Certification of Technical Amendments

Review Date	Description of Technical Amendment	Name and signature of person certifying this technical amendment

ATTACHMENT 2 – Oil Spill Contingency Plan and Checklist

An oil spill contingency plan and written commitment of resources is required for:

- Flowlines and intra-facility gathering lines at oil production facilities and
- Qualified oil-filled operational equipment which has no secondary containment.

An oil spill contingency plan meeting the provisions of 40 CFR part 109, as described below, and a written commitment of manpower, equipment and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful is attached to this Plan.	☐

Complete the checklist below to verify that the necessary operations outlined in 40 CFR part 109 - Criteria for State, Local and Regional Oil Removal Contingency Plans - have been included.

Table G-15 Checklist of Development and Implementation Criteria for State, Local and Regional Oil Removal Contingency Plans (§109.5)[a]	
(a) Definition of the authorities, responsibilities and duties of all persons, organizations or agencies which are to be involved in planning or directing oil removal operations.	☐
(b) Establishment of notification procedures for the purpose of early detection and timely notification of an oil discharge including:	
(1) The identification of critical water use areas to facilitate the reporting of and response to oil discharges.	☐
(2) A current list of names, telephone numbers and addresses of the responsible persons (with alternates) and organizations to be notified when an oil discharge is discovered.	☐
(3) Provisions for access to a reliable communications system for timely notification of an oil discharge, and the capability of interconnection with the communications systems established under related oil removal contingency plans, particularly State and National plans (e.g., NCP).	☐
(4) An established, prearranged procedure for requesting assistance during a major disaster or when the situation exceeds the response capability of the State, local or regional authority.	☐
(c) Provisions to assure that full resource capability is known and can be committed during an oil discharge situation including:	
(1) The identification and inventory of applicable equipment, materials and supplies which are available locally and regionally.	☐
(2) An estimate of the equipment, materials and supplies which would be required to remove the maximum oil discharge to be anticipated.	☐
(3) Development of agreements and arrangements in advance of an oil discharge for the acquisition of equipment, materials and supplies to be used in responding to such a discharge.	☐
(d) Provisions for well defined and specific actions to be taken after discovery and notification of an oil discharge including:	
(1) Specification of an oil discharge response operating team consisting of trained, prepared and available operating personnel.	☐
(2) Predesignation of a properly qualified oil discharge response coordinator who is charged with the responsibility and delegated commensurate authority for directing and coordinating response operations and who knows how to request assistance from Federal authorities operating under existing national and regional contingency plans.	☐
(3) A preplanned location for an oil discharge response operations center and a reliable communications system for directing the coordinated overall response operations.	☐
(4) Provisions for varying degrees of response effort depending on the severity of the oil discharge.	☐
(5) Specification of the order of priority in which the various water uses are to be protected where more than one water use may be adversely affected as a result of an oil discharge and where response operations may not be adequate to protect all uses.	☐
(6) Specific and well defined procedures to facilitate recovery of damages and enforcement measures as provided for by State and local statutes and ordinances.	☐

[a] The contingency plan must be consistent with all applicable state and local plans, Area Contingency Plans, and the National Contingency Plan (NCP)

ATTACHMENT 3 – Inspections, Dike Drainage and Personnel Training Logs

ATTACHMENT 3.1 – Inspection Log and Schedule

Table G-16 Inspection Log and Schedule

This log is intended to document compliance with §§112.6(a)(3)(iii), 112.8(c)(6), 112.8(d)(4), 112.9(b)(2), 112.9(c)(3), 112.9(d)(1), 112.9(d)(4), 112.12.(c)(6), and 112.12(d)(4), as applicable.

Date of Inspection	Container / Piping / Equipment	Describe Scope (or cite Industry Standard)	Observations	Name/ Signature of Inspector	Records maintained separately [a]
					☐
					☐
					☐
					☐
					☐

[a] Indicate in the table above if records of facility inspections are maintained separately at this facility.

ATTACHMENT 3.2 – Bulk Storage Container Inspection Schedule – onshore facilities (excluding production):

To comply with integrity inspection requirement for bulk storage containers, inspect/test each shop-built aboveground bulk storage container on a regular schedule in accordance with a recognized container inspection standard based on the minimum requirements in the following table.

Table G-17 Bulk Storage Container Inspection Schedule

Container Size and Design Specification	Inspection requirement
Portable containers (including drums, totes, and intermodal bulk containers (IBC))	Visually inspect monthly for signs of deterioration, discharges or accumulation of oil inside diked areas
55 to 1,100 gallons with sized secondary containment	Visually inspect monthly for signs of deterioration, discharges or accumulation of oil inside diked areas plus any annual inspection elements per industry inspection standards
1,101 to 5,000 gallons with sized secondary containment and a means of leak detection[a]	
1,101 to 5,000 gallons with sized secondary containment and no method of leak detection[a]	Visually inspect monthly for signs of deterioration, discharges or accumulation of oil inside diked areas, plus any annual inspection elements and other specific integrity tests that may be required per industry inspection standards

[a] Examples of leak detection include, but are not limited to, double-walled tanks and elevated containers where a leak can be visually identified.

ATTACHMENT 3.3 – Dike Drainage Log

Table G-18 Dike Drainage Log

Date	Bypass valve sealed closed	Rainwater inspected to be sure no oil (or sheen) is visible	Open bypass valve and reseal it following drainage	Drainage activity supervised	Observations	Signature of Inspector
	☐	☐	☐	☐		
	☐	☐	☐	☐		
	☐	☐	☐	☐		
	☐	☐	☐	☐		
	☐	☐	☐	☐		
	☐	☐	☐	☐		
	☐	☐	☐	☐		
	☐	☐	☐	☐		

ATTACHMENT 3.4 – Oil-handling Personnel Training and Briefing Log

Table G-19 Oil-Handling Personnel Training and Briefing Log		
Date	**Description / Scope**	**Attendees**

ATTACHMENT 4 – Discharge Notification Form

In the event of a discharge of oil to navigable waters or adjoining shorelines, the following information will be provided to the National Response Center **[also see the notification information provided in Section 7 of the Plan]**:

Table G-20 Information provided to the National Response Center in the Event of a Discharge			
Discharge/Discovery Date		Time	
Facility Name			
Facility Location (Address/Lat-Long/Section Township Range)			
Name of reporting individual		Telephone #	
Type of material discharged		Estimated total quantity discharged	Gallons/Barrels
Source of the discharge		Media affected	☐ Soil ☐ Water (specify) ☐ Other (specify)
Actions taken			
Damage or injuries	☐ No ☐ Yes (specify)	Evacuation needed?	☐ No ☐ Yes (specify)
Organizations and individuals contacted	☐ National Response Center 800-424-8802 Time ☐ Cleanup contractor (Specify) Time ☐ Facility personnel (Specify) Time ☐ State Agency (Specify) Time ☐ Other (Specify) Time		