

Appendix G:

Astoria Station Emergency Response Action Plan

Table of Contents

1. Purpose and Scope.....	3
2. Responsible Personnel.....	3
3. Definitions.....	4
4. General Facility Emergency Information.....	5
5. Incident Discovery and Immediate Response.....	5
6. Employee Actions – All Emergencies.....	6
7. Safety Alarm and Emergency Evacuation Procedure.....	7
8. Power Outages.....	7
9. Medical Emergency.....	7
10. Fire.....	8
11. Chemical Release or Oil Spill.....	8
12. Severe Weather, Flood, Earthquake Emergency.....	8
13. Bomb Threat Procedures.....	9
14. Civil Disturbance, Security Breach, Active Shooter.....	9
15. Emergency Shutdown Procedure.....	11
16. Training & Review Requirements.....	12
Appendix A – AST-OPS-0000-004 SITE INSPECTION – SECURITY.....	13
Appendix B – AST-SAF-0000-003 Astoria Hazardous Material Procedure.....	17
Appendix C – Bomb Threat Report Form.....	21

1.0 Purpose and Scope

- 1.1 The purpose of the Astoria Emergency Response Action Plan (ERAP) provides emergency response procedures for the Astoria employees, contractors, and visitors in the event of a facility evacuation, fire, natural disaster, hazardous material release, medical emergencies, and civil disturbances. The ERAP applies to the Otter Tail Power Company Astoria Station permanent buildings, temporary structures, and construction zones. Any response for the above emergencies shall follow the **Otter Tail Power Corporation Crisis Response Communication Plan (CRCP)** also. As listed in the CRCP, the OTP Spokesperson is the main contact.
- 1.2 The Astoria ERAP is outlined in the following sections and will be implemented during an emergency. Modification to the procedures can occur during the emergency, if the site supervisor/person in charge determines a different procedure will result in a more efficient and safer response to the emergency or to expand or contract the response structure to meet the specific emergency.
- 1.3 The ERAP will be communicated to employees during orientation of newly hired employees, in employee meetings, and through official memos to ensure that all employees are familiar with the emergency reporting and evacuation procedures.

2.0 Responsible Personnel

- 2.1 Facility Manager
 - 2.1.1 Supports the ERAP
- 2.2 Facility Supervisor
 - 2.2.1 Has overall responsibility for the ERAP, maintaining records, training, mock drills, and conducting program evaluations.
 - 2.2.2 Provides resources to coordinate and administer the Plan.
 - 2.2.3 Responsible for ensuring that the ERAP and procedures are followed at the Astoria station.
 - 2.2.4 Makes necessary communications and reports to **Facility Manager, Vice President, Information Center, and OTP Spokesperson** (see CRCP).
- 2.3 Facility Employees
 - 2.3.1 Provides emergency response in the immediate mitigation of an emergency response situation.
 - 2.3.2 Attends required training to maintain emergency response skills.
 - 2.3.3 Participates in drills and evaluates effectiveness of ERAP.
- 2.4 Otter Tail Power Company Public Relations
 - 2.4.1 Manages media inquiries.

3.0 Definitions

- 3.1 *Incipient Stage Fire* – A fire in the beginning stages that can be controlled with portable fire extinguishers and small hose systems. A fire is considered beyond incipient when the use of thermal protective clothing or self-contained breathing apparatus is required.
- 3.2 *Emergency* – Any unplanned event that can cause significant injuries or death to employees, visitors, contractors, or the public; or that can shut down businesses, disrupt operations, can cause physical or environmental damage; or can threaten financial standing or public image.
- 3.3 *Emergency Response Action Plan* – The written plan of action for the efficient deployment and coordination of emergency services, agencies, and personnel to provide the earliest possible response to an emergency. The ERAP is put into effect whenever a crisis, man-made or natural, disrupts operations, threatens life, or causes major damage.
- 3.4 *Bomb Threat* – Communication that an explosive or bomb has been placed on the Astoria Station property.
- 3.5 *Civil Disturbance* – A demonstration, building takeover, confrontation, or other event that would disrupt routine or operations at the Astoria Station. Examples of civil disturbances can also include drones flying over company property and suspicious personnel/vehicles around the company property.
- 3.6 *Hazardous Material Release* – An occurrence where there has been a leak or spill of hazardous materials which has or could cause physical injuries, death or significant environmental damage.
- 3.7 *Natural Disaster* – A natural occurrence resulting in structural damage that has or could cause injury, death, property damage, and/or interruption of services.
- 3.8 *Severe Weather* – Any weather condition that has or could cause injury, death, major property damage, or interruption of operations on Astoria station property. This includes blizzard, flood, strong winds, electrical storm, tornado, and snow accumulation.
- 3.9 *Cyber Event* – Any observable, measurable occurrence where programmable electronic device(s) are deviating from normal operations. Cyber Events shall be evaluated using the site **Cyber Security Plan** and its procedures.

4.0 General Facility Emergency Information

Facility Name:	Otter Tail Power Company Astoria Station
Location:	19333 482 nd Ave, Astoria, South Dakota
County:	Deuel County
Phone Number:	605-832-4084
Latitude:	44.560116
Longitude:	-96.559397
Current Operations:	Power Generation
NAICS Code:	221112
Owner:	Otter Tail Power Company
Owner Location	215 S. Cascade Street, Fergus Falls, Minnesota, 56357
Phone Number:	(218)-739-8200
Hazardous Material Storage	
	SEE INVENTORY LIST AT END OF APPENDIX B

Astoria Station Personnel		
Title	Name	Contact Information
Manager, Natural Gas Turbine Operations & NERC Compliance	Mike Olson	Business: 218-739-8411 Mobile: 218-770-4781
Foreman Combustion Turbine Technician	Lance Koistinen	Business: 605-832-4084 Mobile: 605-881-3160
Combustion Turbine Technician	Luke Knutson	Business: 605-832-4084 Mobile: 218-531-3449

5.0 Incident Discovery and Immediate Response

- 5.1 Employees or Contractors, upon initial observation or discovery of a spill, release, fire, or other emergency are trained to and shall initiate the following response general steps.
- 5.2 For site security inspection, see the document **AST-OPS-0000-004 SITE INSPECTION-SECURITY** located in Appendix A.

5.3 The following table contains the required notification contact information in the order the calls shall be made.

Call Order	Contact Information	Phone Number
1	Control Room	605-832-4084
2	Emergency Services	911
3	OTP System Operations	218-739-8263
4	Site Manager	218-770-4781

5.4 To help prevent emergencies, Otter Tail Power Company developed the **Just Doesn't Look Right (JDLR)** program. When you're on the job and notice anything that just doesn't look right, notify the control room. The control room should notify plant supervision which should then contact the Information Center by calling 8326 or emailing InfoCenter@otpc.com.

6.0 Employee Actions – All Emergencies

6.1 The following are the basic steps common to all incident and emergency response actions to be taken at the facility.

6.2 Step One – Safety

6.2.1 Ensure that personal health and safety has been secured and take no actions that endanger yourself or others. This may include setting up an exclusion zone to prevent unauthorized entry to the incident area. If necessary, have employees evacuate to the facility designated evacuation point.

6.3 Step Two – Information. Collect basic information regarding the nature of the incident:

6.3.1 Nature of emergency (i.e. fire, spill, etc.);

6.3.2 Location of emergency.

6.3.3 Size and extent of emergency.

6.3.4 Materials involved; and

6.3.5 Injury to personnel.

6.4 Step Three – Communicate. Report incident using the call order list **as necessary**.

6.5 Step Four – Evacuate. Notify any personnel in the immediate area of immediate danger and initiate evacuation **if necessary**.

6.6 Step Five – Respond. If properly trained.

6.7 Step Six – All Clear.

- 6.7.1 After the emergency has been safely handled, the person in charge will give the “All Clear” direction to allow employees, contractors, and visitors back onsite.

7.0 Safety Alarm and Emergency Evacuation Procedures

- 7.1 In the event of a workplace emergency, the evacuation of an affected area will proceed immediately. Depending on the type of emergency and the severity, this may include the entire facility.
- 7.2 The area near the Main Plant Gate is the designated area for evacuation. In the event of inclement weather, the control room bathroom is the designated storm shelter at the Astoria location.
- 7.3 Any other personnel that are onsite shall be notified and accounted for at the designated area.
- 7.4 The site lead person shall notify plant supervision of the event and current status of all personnel.
- 7.5 Notify System Operations of the emergency.
- 7.6 If the emergency conditions warrant outside assistance, contact 911.

8.0 Power Outages

- 8.1 If a power outage is determined to affect the safety of employees, contractors, or visitors, plant supervision may initiate restrictions or release visitors, contractors, or employees.

9.0 Medical Emergency

- 9.1 When an employee(s) is found in need of medical attention, the person(s) finding the victim(s) shall contact the Control Room or plant supervision.
- 9.2 If the injury is determined to be non-life threatening, the responder will provide treatment or decide if the injured must be transported to a medical facility. A member of Management and one other employee, if available, will accompany the employee to the medical facility.
- 9.3 In the event the injury is determined to be of a serious nature or is life threatening, the responder will notify the control room and call 911. If the injured person has sustained a head or spinal injury or is unconscious, the injured employee shall not be moved unless absolutely necessary by nature of the surrounding hazards.

10.0 **Fire**

- 10.1 The person discovering the fire shall immediately contact the Control Room. The Control Room will call the fire department at 911. The individual making the notification should give an accurate description of the situation including location and property involved.
- 10.2 If at any time, the fire threatens the health and safety of any employees, the area should be evacuated immediately.
- 10.3 The emergency evacuation procedures identified in Section 7.0 shall be followed if an evacuation is necessary.
- 10.4 If the fire is small (incipient), employees trained in the use of fire extinguishers may attempt to extinguish the fire with available extinguishers in the area. If at any time, the fire becomes unmanageable, the employees shall evacuate the area immediately. At no time should any employee risk their life to extinguish the fire.

11.0 **Chemical Release or Oil Spill**

- 11.1 For any response to chemical release or oil spill at Astoria Station, see the document **AST-SAF-0000-003 Astoria Hazardous Material Procedure** located in Appendix B.

12.0 **Severe Weather, Flood, or Earthquake**

- 12.1 Site personnel responsible for monitoring weather broadcasts during times of severe weather by monitoring local radio stations and/or Internet weather providers.
- 12.2 Site personnel should distinguish between a Tornado Watch (which means that weather conditions are right for a possible tornado) and a Tornado Warning (which means that a tornado has been spotted and those in the affected area should take cover).
- 12.3 If a warning is in effect, site personnel should note the last location and direction of movement of the storm. If imminent danger exists, all site personnel shall evacuate to the control room bathroom.
- 12.4 In the event of a flood – not applicable at this location.
- 12.5 In the event of an earthquake – all employees/contractors/visitors shall exit any and all buildings and assemble at the site front gate for instructions.

13 **Bomb Threat Procedures**

- 13.1 The individual receiving the call should obtain as much information as possible. Legitimate callers usually wish to avoid inquiries, therefore, request information by expressing an interest in preventing people from being hurt.
- 13.2 The individual receiving the call or notification shall document as much information as possible. Please document information on the **Bomb Threat Report Form** located in Appendix C.
- 13.3 The person receiving the call or notification should immediately notify their Supervisor and avoid discussing the information with other personnel to avoid panic and potential injury from uncontrolled evacuation.
- 13.4 The person in charge will call 911 to notify the County Bomb Squad.
- 13.5 After the call has ended and all information has been gathered, the individual that receives the call should contact the phone company to inquire if the call that was received can be traced.
- 13.6 If threat seems legitimate, the site lead person will initiate a plant evacuation.

14 **Civil Disturbance, Security Breach, Active Shooter**

- 14.1 In the event of a **civil disturbance**, to include intrusion by hostile persons or other criminal activities, the following actions are required:
 - 14.1.1 The person discovering the incident should immediately notify their Supervisor and remain in the area, secure and monitor the situation as long as it is safe to do so.
 - 14.1.2 The person in charge will call 911 to notify the local authorities.
 - 14.1.3 No member of the plant will place themselves in danger or take action without direction from the local authorities.

- 14.2 In the event of a **security breach**, to include individual(s) that are identified on Plant property at any time which may not have authorization or permission, the following actions are required:
- 14.2.1 The person discovering the individual(s) should immediately contact the Control Room and/or Supervisor to obtain any information to verify that individual(s) may have been authorized or received permission to be on Plant property. The communication should include but not limited to the following:
- a) Who, (indications of company name)
 - b) How many individuals
 - c) Location of activity
 - d) What activity is observed
 - e) Vehicle (description, color, license plate number, door signage)
- 14.2.2 If the verification can be confirmed, the individual(s) are deemed to have the appropriate authorization.
- 14.2.3 If the verification cannot be confirmed, the employee who discovered the breach, may approach the individual(s) to request identification and what activities these persons are involved in. This may be done if the activity and observations result in a decision that indicates no unsafe conditions exist. **IF** the observations result in activities or actions that appear unsafe, involve criminal intent, or could result in any form of possible harm or property damage, the Control Room shall be notified to call 911 and summon law enforcement to area in which the individual(s) are located. The Control Room will also contact the Plant Supervisor. The employee observing the individual(s), if possible and safe to do so, will stay in contact with the Control Room for any updates or changes and continue to monitor from a safe vantage point until law enforcement is on the scene.
- 14.2.4 If the Plant security cameras can obtain video footage of the individual(s), the Control room shall manipulate the camera(s) to maintain video of the activities.
- 14.2.5 At no time should anyone NOT having authorization be allowed in the Control Room, Relay Room, near any MCC, or critical breaker area. If the location is safe and clear, have individual(s) maintain their presence at the same location. If individual(s) are close to a critical area, have them move away from that area.
- 14.2.6 Upon conclusion of the security breach, a report will be submitted to the highest level of Plant Management. The report should contain details of the specific event timeline, persons involved, video coverage, statements and corrective actions to be implemented.

14.3 An **active shooter** is an armed person who appears to be actively engaged in killing or attempting to kill people. Active shooter situations escalate quickly and usually without warning. If an active shooter enters the facility or onto the property:

14.3.1 Look for the nearest exit away from the sound if you hear gunshots.

14.3.2 Alert other employees near you and exit the building as quickly as possible. Do not remain outside the door you exited. Get away from the building in case the shooter follows. Call the Control Room to call 9-911 for law enforcement.

14.3.3 If you cannot get to an exit, find a place to hide. Try to hide in a room that can be locked from the inside. Barricade the door if it cannot be locked. Turn off lights and lay down on the floor. Do not talk or move. Designate someone to contact Control Room quietly.

14.3.4 If the shooter enters the room you are in and you cannot escape, the very last resort will be to attempt to disarm your attacker. If there are multiple people in the room, develop a plan of action.

14.3.5 When police enter the building or onto the property, remain calm and follow instructions. Their first priority is to disable the shooter so do not expect them to stop and help the injured. **Keep in mind that police do not know who the shooter is so do not make any threatening movements.**

- Remain calm and follow officer's instructions
- Put down any items in your hands
- Immediately raise hands and spread fingers and keep them visible at all times
- Avoid pointing, screaming, and/or yelling.

15 **Emergency Shutdown Procedures**

15.1 Emergency Shutdown Procedures are established and implemented to minimize the potential for loss of life and damage to property.

15.2 Operating personnel should use their experience and judgement to determine if, or when, to trip the unit. If emergency conditions create imminent danger, they are to evacuate as quickly as possible to a safe area and report to their Supervisor.

16 Training and Review Requirements

- 16.1 All employees will receive training on the ERAP at first hire as well as biennially after that.
- 16.2 Review of the ERAP will be performed biennially.
- 16.3 Mock drills may be conducted annually as close to an actual emergency as possible with all aspects of the ERAP followed. The drills will be documented and reviewed to improve the Astoria Station ERAP.

Appendix A – AST-OPS-0000-004 Site Inspection - Security

1. Policy Statement

It is the policy of Otter Tail Power Company to comply with all Federal, State and Local requirements. Otter Tail Power Company strives to ensure maximum availability at its generation facilities.

2. Purpose

The purpose of this procedure is to describe the steps necessary to complete a plant site inspection and security check in order to ensure unit availability. This procedure is also intended to ensure that plant operators are aware of the possibility of sabotage and how to properly respond to suspected cases of sabotage.

3. Scope

This program applies to the Otter Tail Power Company's Astoria Station located North of Astoria, SD.

4. Definitions

- 4.1 OTP. Otter Tail Power Company
- 4.2 NERC. North American Electric Reliability Corporation
- 4.3 DCS. Distributive Control System
- 4.4 GSU. Generator Step-up Transformer
- 4.5 UAT Unit Auxiliary Transformer
- 4.6 SFC Startup Frequency Converter
- 4.7 CCW Closed Cooling Water
- 4.8 PDC Power Distribution Center
- 4.9 CEMS Continuous Emissions Monitoring System
- 4.10 SOP. Standard Operating Procedure
- 4.11 HVAC. Heating Ventilating and Air Conditioning
- 4.12 ICT Internal Combustion Turbine
- 4.13 Sabotage. The intentional destruction of facilities by causing damage to company property or processes with the intent of disrupting normal plant operations.

5. Responsibilities

- 5.1 OTP Astoria Site Personnel
 - 5.1.1 Perform site inspections and security checks as per this procedure.
 - 5.1.2 Document site inspections and security checks as per this procedure
 - 5.1.3 Be able to recognize unusual conditions and circumstances at the site through familiarity with normal site conditions when the unit is online or offline.

- 5.1.4 Be familiar with the proper procedure for reporting unusual conditions especially when those conditions are suspected sabotage events.
- 5.1.5 Notify the site supervisor and OTP dispatch immediately of any unusual conditions that could affect unit availability.**
- 5.1.6 Be familiar with NERC standard **EOP-004** and the site Cyber Security Plan regarding sabotage reporting.
- 5.1.7 Obtain “AST-PKR-FRM-004 OTP Site Security CHECK SHEET and initial appropriate areas on the check sheet as the tasks are completed. File completed check sheet in appropriate site file location.

- 5.2 Procedure Administrator or designated alternate
 - 5.2.1 Ensure that the procedure is accurate and complete.
 - 5.2.2 Updates the procedure as necessary to ensure compliance with current laws.
 - 5.2.3 Ensure that site personnel are kept informed of any changes to the procedure.

6. Procedure

6.1 Weekly Outside and General Site Checks

6.1.1 Site Perimeter Fencing

- 6.1.1.1 Check entire fence for signs of damage.
- 6.1.1.2 Verify all locks and locking mechanisms on gates are intact.
- 6.1.1.3 Check for erosion under fencing that may cause future integrity issues or allow for unauthorized access.
- 6.1.1.4 Ensure all warning signs on perimeter fencing are intact and legible.
- 6.1.1.5 Check for signs of vehicle or pedestrian traffic near perimeter fencing that may indicate unauthorized access.
- 6.1.1.6 Check all for signs of any unauthorized tampering.

6.1.2 Gas Yard Area

- 6.1.2.1 Check entire fence for signs of damage.
- 6.1.2.2 Check for erosion under fencing that may cause future integrity issues or allow for unauthorized access.
- 6.1.2.3 Check for signs of vehicle or pedestrian traffic near perimeter fencing that may indicate unauthorized access.
- 6.1.2.4 Check for signs of damage to the buildings.
- 6.1.2.5 Listen for any indication of a natural gas leak.

6.1.3 Switchyard

- 6.1.3.1 Verify that circuit breaker control cabinets are intact and show no signs of damage.
- 6.1.3.2 Visually check the metal support pillars, towers, and bus bars for any signs of damage
- 6.1.3.3 Inspect insulators for any signs of damage or cracking.

6.1.4 Gas Heater/Calorimeter/Filter Area

- 6.1.4.1 Verify no indication of gas leaks.

- 6.1.4.2 Verify Valves appear to be in proper alignment.
- 6.1.4.3 Check that any locks are in place.
- 6.1.4.4 Look for any obvious damage to piping or supports.

6.1.5 GSU/UAT/SFC Transformers

- 6.1.5.1 Visually inspect for signs of physical damage, bulging, and corrosion
- 6.1.5.2 Inspect containment berm(s) for any indication of concrete spalling or cracking.
- 6.1.5.3 Inspect entire area for signs of oil leakage, especially drain valves and sample ports.
- 6.1.5.4 Inspect for damage to insulators.
- 6.1.5.5 Verify proper oil level on gauge.

6.1.6 CCW Heat Exchanger Area

- 6.1.6.1 Look for any obvious leaks.
- 6.1.6.2 If operating, listen for unusual noises.
- 6.1.6.3 Inspect for any signs of piping damage or support damage.

6.1.7 CT Cooling Air Cooler Area

- 6.1.7.1 Look for any obvious leaks.
- 6.1.7.2 If operating, listen for unusual noises.
- 6.1.7.3 Inspect for any signs of piping or support damage.

6.1.8 Turbine-Generator General Area

- 6.1.8.1 Check all man doors and overhead doors for any signs of damage.
- 6.1.8.2 Visually look for any structural damage
- 6.1.8.3 Look for any signs of unauthorized access – tire tracks, etc.

6.2 Weekly Interior Checks

6.2.1 Cold Storage Building

- 6.2.1.1 Verify no signs of damage to interior.
- 6.2.1.2 Perform a quick visual inspection of the doors and verify no damage.
- 6.2.1.3 Ensure doors are secure when leaving.

6.2.2 GT Control Building and Battery Room

- 6.2.2.1 Visually check exterior of building including HVAC units for damage
- 6.2.2.2 Inspect interior of building – cabinet doors closed – no MCC doors open.
- 6.2.2.3 Check exhaust fan in battery room for proper operation.
- 6.2.2.4 Verify eyewash station is ready for use and clear of obstructions.
- 6.2.2.5 Verify HVAC unit is operating.

6.2.3 PDC Building and Battery Room

- 6.2.3.1 Visually check exterior of building including HVAC units for damage
- 6.2.3.2 Inspect interior of building – cabinet doors closed – no MCC doors open.
- 6.2.3.3 Check exhaust fan in battery room for proper operation.
- 6.2.3.4 Verify eyewash station is ready for use and clear of obstructions.
- 6.2.3.5 Verify HVAC is operating

6.2.4 Maintenance Building

- 6.2.4.1 Verify no signs of damage to doors or exterior of building.
- 6.2.4.2 Listen to Air compressor Operation for any unusual noises.
- 6.2.4.3 Look for any signs of leaking or damaged piping.
- 6.2.4.4 Verify HVAC units are operational.

6.2.5 Fire Protection Pumphouse

- 6.2.5.1 Verify no signs of damage to doors or exterior of building.
- 6.2.5.2 Verify lighting is operational.
- 6.2.5.3 Look for any signs of water leaks.
- 6.2.5.4 Look for any signs of diesel fuel leaking from piping or tank leaks.
- 6.2.5.5 Verify any required locks on valves are in place.

6.2.6 CEMS Building

- 6.2.6.1 Verify no signs of damage to doors or exterior of building.
- 6.2.6.2 Verify lighting is operational.
- 6.2.6.3 Look for any signs of water leaks.
- 6.2.6.4 Check Bottle Storage Room for any signs of damage to regulators or piping.

6.3 Special Note on Identifying Possible Sabotage of Equipment

- 6.3.1 While doing all the checks outlined in this procedure, keep in mind the possibility that any damage or unusual conditions found could have been caused intentionally. Some signs of intentional damage could include:
 - 6.3.1.1 Cut bolts or pipes.
 - 6.3.1.2 Cut fencing.
 - 6.3.1.3 Bullet holes
 - 6.3.1.4 Valve misalignment or open drain valves
 - 6.3.1.5 Power shut off to devices.
 - 6.3.1.6 Locks cut or missing.
 - 6.3.1.7 Damage to containment berms or devices
 - 6.3.1.8 Control switches in wrong positions
 - 6.3.1.9 Other abnormal conditions that cannot be attributed to normal operating or maintenance procedures.
- 6.3.2 **If an abnormal condition is suspected of being an intentional act designed to disrupt normal plant operations, it should be considered a possible act of sabotage and needs to be reported immediately. Refer to OTP SOP EOP-004 and possibly the site Cyber Security Plan regarding sabotage reporting and follow the reporting requirements outlined.**

6.4 Program Evaluation

- 6.4.1 The Procedure Administrator shall, on a biennial basis, review the Site Inspection-Security Procedure for both process and program effectiveness.

Appendix B

Astoria Station Hazardous Material Procedure

Policy Statement

It is the policy of Otter Tail Power Company to Company (OTP) to provide a safe working environment and provide the necessary means of hazard detection and plan for responses to those hazards.

7. Site Description:

The Astoria Station site is a zero-discharge facility. All the building floor drains, and equipment drains go to an Oil/Water Separator. The Oil/Water separator is composed of a 6000-gallon holding tank for recycled water and a 2000 gallon holding capacity for oily waste. The oily waste portion has a high level and hi-hi level alarms which annunciate inside the control room to allow for arrangements to be made for oily waste removal by a qualified contractor.

8. Purpose

This procedure is intended to give OTP Employees, the local Fire Department and the local Hazardous Material cleanup crew quick reference to all the hazardous materials on the Astoria Station site and their location. For OTP Employees it is a quick reference for the first response to a leak or spill and directions who to contact for assistance. For the local Fire Department, it will alert them of all hazardous material so they can properly address a fire and minimize their risk of exposure to the hazardous materials on site. For the local Hazardous Material Emergency Response group, it will serve as an information guide to aid them in preparation for a spill or leak event at the site.

9. Scope

This program applies to the Otter Tail Power Company's Astoria Station and is intended to be a supplement to the Energy Supply Safety Rules Book (SRB) Hazardous Communications section I – Emergency Response and to the OTP Astoria Station SPCC plan. The intent of this procedure is to identify all large quantities, over 5 gallons, of hazardous materials that are stored or handled at the Astoria Station Site and outline how to address spills or leaks of such products in a safe manner. This cannot cover every possible scenario but is intended as a guideline to assist employees in addressing spill incidents and to be aware of the individual product hazards. All OTP Plant Employees shall be familiar with OTP Energy Supply SRB Hazardous Communications section and the OTP Astoria Station SPCC Plan. This procedure does not cover all hazardous products used and stored at the site but focuses on larger quantities that could pose a threat to personnel or the environment in the event of a leak or spill.

10. Definitions

- 10.1 Hazardous Materials (Haz Mat); defined as any substance or material that could adversely affect the safety of the public, handlers or carriers during transportation or handling of that substance.
- 10.2 Spill Prevention Control and Countermeasures Plan (SPCC Plan); Developed by OTP Environmental Services Department for environmental compliance related to oil storage.

- 10.3 DOT; Department of Transportation
- 10.4 West Central Environmental Consultant (WCEC) Local contractor based in Morris, MN specializing in Hazardous Material clean up.
- 10.5 OSI Environmental, Inc.; Contractor specializing in disposal and recycling of hazardous material and contaminated liquids.

11. Contacts

- 11.1 Extreme emergencies: 911.
- 11.2 OTP Environmental Services, 24 Hour spill reporting: (218) 739-8330, Manager; Mark Thoma (work) (218)-739-8526, (home) (218)-998-7899 OR Paul Vukonich (work) (218)-739-8349, (home) (218)-205-0119.
- 11.3 OTP Department Supervision/Management; Michael J. Olson (work) (218)-739-8411, (cell) (702)-770-4781
- 11.4 WCEC (Spill response organization) if needed (24 Hour): 888-923-2778.
- 11.5 OSI Environmental, Inc.; (218) 751-2026

12. Procedure

- 12.1 Step 1: At first sight of a spill or leak the OTP Plant Employee should identify the product and contain it with the spill cart if possible. All efforts should be made to stop the leak or contain it with the spill cart materials.
- 12.2 Step 2: If the leak is from a pressurized system being used during operation of the plant, (example: fuel or glycol) the first response should be to shut down the plant and isolate the source of the leak by closing the necessary isolation valves and shutting off source equipment.
- 12.3 Step 3: Efforts should be made, if they can be safely implemented by OTP Plant Employees, to prevent escape of material outside of the building collection system. If the best response is to let the leak go to the floor drain system let it go there.
- 12.4 Step 4: Contact the necessary OTP personnel; Supervision/Management and Environmental Services as outlined in the SPCC plan. Give them a description of the incident and request guidance if needed on disposal or recycling of waste product.
- 12.5 Step 5: For assistance with containment or clean up contact WCEC Industrial Services on their 24/7 emergency phone line listed above. Give them a quick description of the product, estimate of quantity using the product name and item number on our material list.
- 12.6 Step 6: Assist WCEC Industrial Services as needed with LOTO and technical advice.
- 12.7 Step 7: If disposal or recycling of material does not fall into WCEC Industrial Services scope contact OSI Environmental, Inc.

13. Responsibilities

- 13.1 Plant Operations and Maintenance Personnel
 - 13.1.1 Stay current on the Astoria Station SPCC Plan and its reporting procedures.
 - 13.1.2 Review the Energy Supply Right to Know/Hazard Communication Program annually.
 - 13.1.3 Stay current on all Safety Data Sheets (SDS) and review on an annual basis.
 - 13.1.4 Understand the hazards involved with all products handled and stored on the plant site.
- 13.2 Procedure Administrator or designated alternate
 - 13.2.1 Ensure that the procedure is accurate and complete.
 - 13.2.2 Updates the procedure as necessary to ensure compliance with current laws.

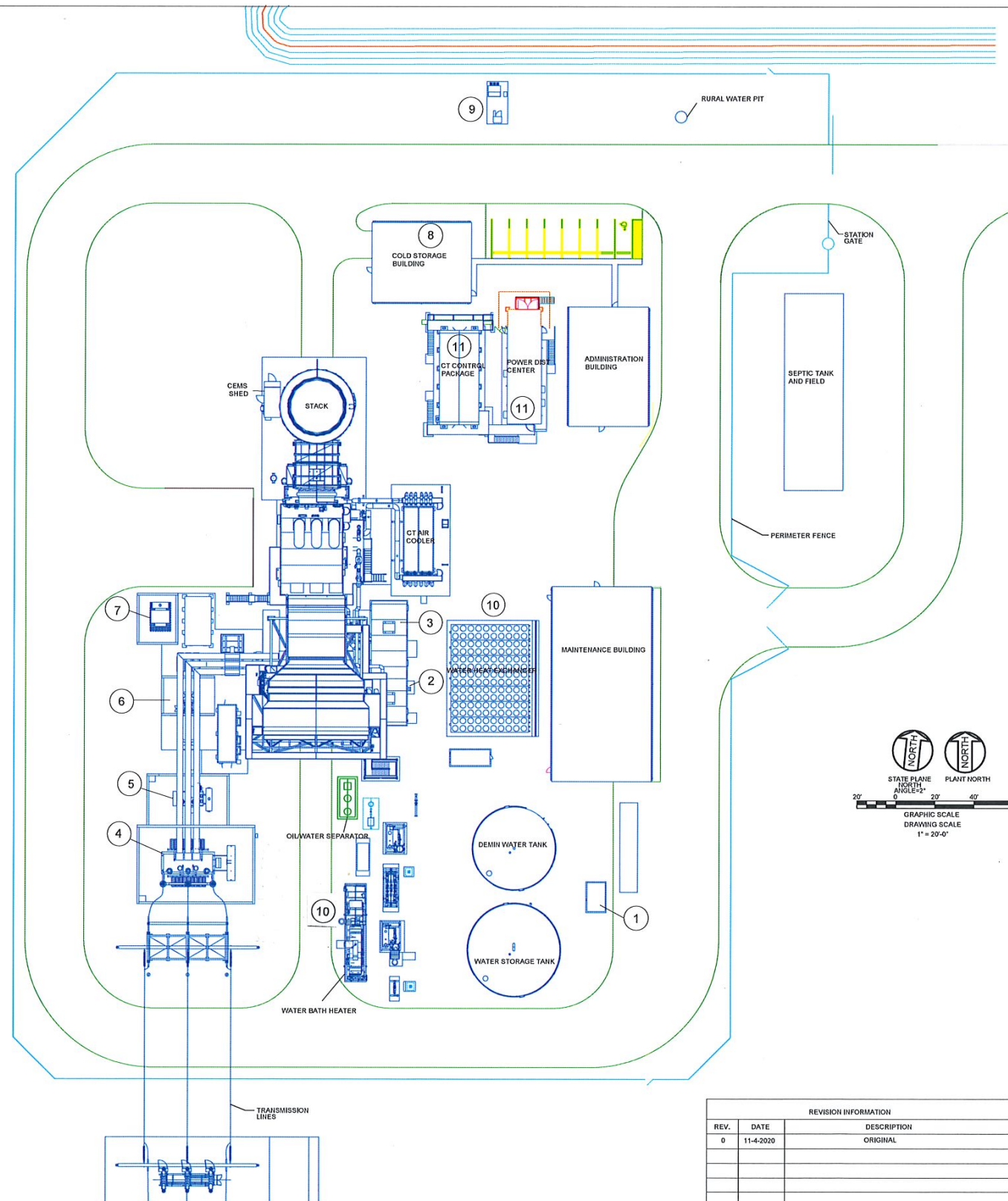
13.2.3 Ensure that site personnel are kept informed of any changes to the procedure.

8 References and Attachments

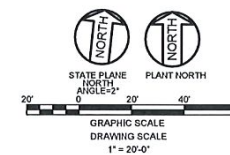
- 8.1 Reference: OTP Energy Supply Safety Rules Book section “Right-To-Know/Hazard Communication”
- 8.2 Reference: OTP Spill Prevention Control and Countermeasures Plan, Astoria Station
- 8.3 Hazardous Material Program for Astoria Station Site (This procedure is the first tab of the Program), which also includes.
 - 8.3.1 Hazardous Material List
 - 8.3.2 Hazardous Material Location DWG

Table 1. Hazardous Materials List and Locations (containers > 55 gals)

Tank or Equipment	Volume (gallons)	Contents	Construction	Secondary Containment
1	300	No. 2 Fuel Oil	Steel Tank	Dual Wall with leak detection
2	8,450	Turbine/Gen Lube Oil Reservoir	Steel Oil Tank	Concrete Containment Dike
3	180	Turbine Control Oil Reservoir	Stainless Steel Oil Tank	Concrete Containment Dike
4	15,273	GSU Transformer	Steel Transformer	Concrete Containment Dike
5	3,144	UAT Transformer	Steel Transformer	Concrete Containment Dike
6	620	Excitation Transformer	Steel Transformer	Concrete Containment Dike
7	1,820	SFC Transformer	Steel Transformer	Concrete Containment Dike
8	300-550	Misc. Oil Drums	Steel Drum	Spill Containment Pallets
9	497	RAT Transformer	Pad mount Transformer	Stormwater Collection Pond
10	14,000 (approximate)	Propylene / Water 55/45 Water Bath and CCW	Coolers and Piping	Drains to Oil Water Separator
11	820	Battery Electrolyte	Plastic Battery case	Battery Containment Tray



OIL-CONTAINING EQUIPMENT	
ITEM	DESCRIPTION
1	NO. 2 FUEL OIL - 300 GALLONS
2	TURBINE/GEN LUBE OIL RESERVOIR - 8,450 GALLONS
3	TURBINE CONTROL OIL RESERVOIR - 180 GALLONS
4	GSU TRANSFORMER - 15,273 GALLONS
5	UAT TRANSFORMER - 3,144 GALLONS
6	EXITATION TRANSFORMER - 620 GALLONS
7	SFC TRANSFORMER - 1,820 GALLONS
8	MISCELLANEOUS 55-GAL OIL DRUMS - 300-550 GALLONS
9	RAT TRANSFORMER - 497 GALLONS
10	CCW PROPYLENE GLYCOL
11	BATTERY ELECTROLYTE - 820 GALLONS



REVISION INFORMATION	
REV.	DATE
0	11-4-2020



ASTORIA STATION ERAP MAP	
FIGURE 1	REVISION 0

Appendix C – Bomb Threat Report Form

Bomb Threat Report Form	
Instructions: When taking the call, be calm and courteous to the caller. Listen to every detail of the call and do not interrupt the caller. Document as much information as possible.	
Date of Call: _____	Name of Person Taking the Call: _____
Time of Call: _____ AM/PM	Department: _____
Exact words of person placing the call:	

Questions to Ask the Caller	
When is the device going to detonate / explode?	
Where is the device right now?	
What kind of device is it? What does it look like?	
What will cause it to explode?	
Why did you place the device here?	
What is your name?	

Determine the Following	
Caller Identity	Male <input type="checkbox"/> Female <input type="checkbox"/> Adult <input type="checkbox"/> Juvenile <input type="checkbox"/> Age: _____
Voice	Loud <input type="checkbox"/> Soft <input type="checkbox"/> High-Pitch <input type="checkbox"/> Intoxicated <input type="checkbox"/> Deep <input type="checkbox"/>
Accent	Local <input type="checkbox"/> Foreign <input type="checkbox"/> Region: _____ Description: _____
Speech	Fast <input type="checkbox"/> Slow <input type="checkbox"/> Distorted <input type="checkbox"/> Stutter <input type="checkbox"/> Slurred <input type="checkbox"/> Nasal <input type="checkbox"/>
Language	Excellent <input type="checkbox"/> Good <input type="checkbox"/> Fair <input type="checkbox"/> Poor <input type="checkbox"/> Foul
Manner	Calm <input type="checkbox"/> Angry <input type="checkbox"/> Rational <input type="checkbox"/> Irrational <input type="checkbox"/> Laughing <input type="checkbox"/> Intoxicated <input type="checkbox"/> Righteous <input type="checkbox"/> Emotional <input type="checkbox"/> Coherent <input type="checkbox"/> Incoherent <input type="checkbox"/> Deliberate <input type="checkbox"/>
Background Noise	Music <input type="checkbox"/> Voices <input type="checkbox"/> Trains <input type="checkbox"/> Animals <input type="checkbox"/> Office <input type="checkbox"/> Factory <input type="checkbox"/> Party <input type="checkbox"/> Airplanes <input type="checkbox"/> Traffic <input type="checkbox"/> Mixed <input type="checkbox"/> Bells/Alarms <input type="checkbox"/> Other: _____