



Prevailing Wind Park

Emergency Response Plan

January 2021

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1. Purpose

Establish responsibilities and guidelines for actions to be taken in the event of emergencies that could occur at the job site. Responsible persons will have to take actions as their judgment dictates based upon the conditions that arise for each emergency, and these guidelines are intended to assist them in making timely decisions and taking appropriate actions.

Subcontractors shall call for assistance, based on the significance of the emergency. All work-related injuries/illnesses MUST be reported IMMEDIATELY to sPower.

- If the emergency requires external emergency responders to arrive on the site, the initial responder must coordinate the response. This includes providing the nature and location of emergency. For emergencies of a significant nature, like fire or ambulance for major medical, the initial responder shall call 911, and then use the Calling Tree.
- Subcontractor management is responsible for getting injured parties to the hospital and emergency treatment at the nearest health care facilities in the most efficient manner possible based on perceived injuries, using ambulance, paramedic units, or air evacuation as needed.
- For all first aid medical incidents, use the Calling Tree to notify Site Response personnel to help provide support. For non-emergency situations like a minor injury, the initial responder shall call the Calling Tree.
- Subcontractor safety personnel should accompany the injured party and use the local occupational medical clinic or hospital nearest the project site.
- Subcontractors must establish their own first aid stations. They shall be made available to their workforce and provided in each trailer and in all trucks on the site.

2. Emergency Action Plan and Contact Information

MAJOR EMERGENCIES

For major emergencies like fire or medical issues requiring an ambulance call 911 immediately. The initial responder (the employee dialing 911) must provide the nature of emergency and the location of the emergency.

Emergency at Turbine/Tower

If the emergency is at a turbine, provide the turbine/tower number and its unique 911 address.

Emergency Elsewhere

If the emergency is at any other location or between towers, provide best location description possible and the site address.

Once contact has been made with emergency services via 911, the incident must immediately be reported to Management/Supervision to assist in the emergency and to report to Safety/Supervision.

All emergency communications at Prevailing Wind Park between employees shall be over 2-way radios and/or with cellular phones, where adequate coverage is available.

Site Address:

Prevailing Wind Park
29604 406th Avenue
Avon, SD 57315

Emergency Phone Numbers:

Fire	911
Ambulance	911
Police	911
Hospital – Wagner (Non-Emergency)	605-384-3418
Hospital – St. Michaels (Non-Emergency)	605-589-2100
Environmental Release (Hazardous spill, etc.)	911
sPower O&M Manager	605-212-0032
sPower Safety Manager	661-371-6019

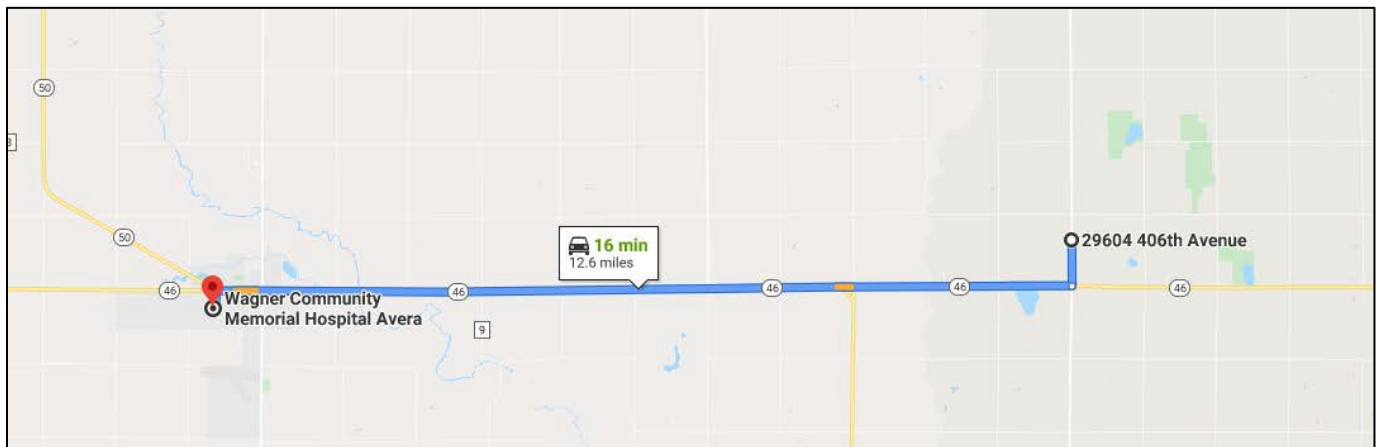
Nearest Medical Facilities

Wagner Community Memorial Hospital

513 3rd Street, SW
Wagner, SD 57380

Directions to Wagner Community Memorial Hospital from Project Site:

- Turn left from O&M building to head south on 406th Ave toward SD-46E
- Turn right at the first cross street onto SD-46 W
- Turn left onto Birch Ave SW
- Turn right onto Memorial Drive

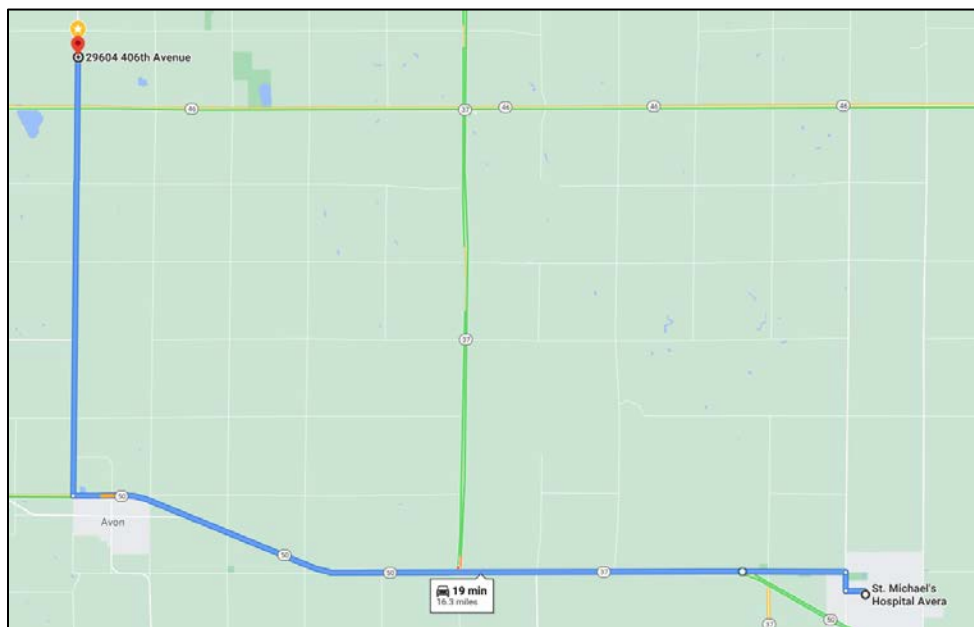


St. Michaels Hospital Avera

410 W 16th Ave
Tyndall, SD 57066

Directions to St. Michaels Hospital Avera from Project Site:

- Turn left from O&M building to head south on 406th avenue toward SD-46 E
- Turn left onto SD-50 E
- Turn left onto Birch St
- Turn right onto W Main St
- Turn right into hospital



Site Rally Point

In the event a rally point is required to gather all employees and guests, that location shall be the Operations and Maintenance building. If an alternate rally point is needed, that location shall be the Avon Fire Hall. In the event of a tornado warning, there is a tornado shelter located in the O&M building storage room floor.

Local Contact Information

Prevailing Wind Park spans four counties. The lists below indicate the facilities within each County and the appropriate point of contact for an emergency.

Bon Homme County

Facilities: O&M building, Coyote substation, meteorological tower, Aircraft Detection Lighting System tower, transmission line, and turbines 01, 02, 03, 04, 05, 06, 07, 10, 11, 13, 14, 17, 18, 20, 21, 24, 27, 29, 31, 33, 34, 35, 36, 38, 42, 43, 44, 46, 47, 50, 52, 53, 54.

Bon Homme County Sheriff
Mark Maggs
605-589-3942

Avon Fire Department
Fire Chief: Kevin Tjeerdsma
office: 605-286-3694
mobile: 605-286-3482
email: kevin_charlene@yahoo.com

Scotland Fire Department (if transmission line emergency)
Fire Chief: Mike Mehrer
office: 605-583-2320
mobile: 605-660-9785
email: mbehl@fmsbscotland.com

Tyndall Fire Department
Fire Chief: Jamie Muller
office: 605-589-3100
mobile: 605-6610805
email: elliothose@hcinet.net

Charles Mix County

Facilities: turbines 08, 09, 12, 15, 16, 22, 23, 26, 32, 37, 39, 40, 41, 45, 48, 49, 57, 58, 60.

Charles Mix County Sheriff
Randy Thaler
605-487-7198

Wagner Fire Department
Fire Chief: Jason VonEschen
office: 605-384-9999
mobile: 605-481-0393
email: vonsculpting@santel.net

Hutchinson County

Facilities: turbines 25, 30, 51, 55, 56

Hutchinson County Sheriff

Jim Zeeb

605-387-2341

Tripp Fire Department

Fire Chief: Wayne Stoebner

office: 605-935-6000

mobile: 605-770-6283

email: trippfiredepartment@hotmail.com

Yankton County

Facilities: Gen-tie line, Road Runner substation

Yankton County Sheriff

Jim Vlahakis

office: 605-668-3567

Lesterville Fire Department

Fire Chief: Paul Scherschligt

office: 605-364-7522

mobile: 605-661-4289

email: lestervillefire17@gmail.com

3. Heat Illness Prevention Plan

DISCLAIMER

- This Heat Illness Prevention Plan (HIPP) is designed to comply with the Heat Illness Prevention Standard T8 CCR 3395.
- These procedures are not intended to supersede or replace the application of any other Title 8 regulation, particularly T8 3203 Injury and Illness Prevention Program (IIPP).
- The employer must also be aware that other standards apply to Heat Illness Prevention such as the requirement to provide for drinking water, first aid and emergency response.

SCOPE AND APPLICATION

These procedures provide steps applicable to most outdoor work settings and are essential to reducing the incidence of heat related illnesses. In working environments with a higher risk for heat illness (e.g., during a heat wave, hot summer months exceeding 95 degrees Fahrenheit, or other severe working or environmental conditions), it is the company's duty to exercise greater caution and ensure these procedures are implemented, including additional protective measures beyond what is listed in this document, as needed to protect employees affected by high heat conditions.

When the temperature exceeds 85 degrees, high heat procedures begin. The foreman will hold short tailgate meetings to review the weather report, reinforce heat illness prevention with all workers and provide reminders to drink water frequently, to be on the lookout for signs and symptoms of heat illness and inform them that shade can be made available upon request.

NOTE: When temperature reaches 95 degrees, High Heat Procedures go into effect.

Definitions

- **"Acclimatization"** means temporary adaptation of the body to work in the heat that occurs gradually when a person is exposed to it. Acclimatization peaks in most people within four to fourteen days of regular work for at least two hours per day in the heat.
- **"Heat Illness"** means a serious medical condition resulting from the body's inability to cope with a particular heat load, and includes heat cramps, heat exhaustion, heat syncope, and heat stroke.
- **"Environmental risk factors for heat illness"** means working conditions that create the possibility that heat illness could occur, including air temperature, relative humidity, radiant heat from the sun and other sources, conductive heat sources such as the ground, air movement, workload severity and duration, protective clothing and personal protective equipment worn by employees.
- **"Personal risk factors for heat illness"** means factors such as an individual's age, degree of acclimatization, health, water consumption, alcohol consumption, caffeine consumption, and use of prescription medications that affect the body's water retention or other physiological responses to heat.
- **"Shade"** means blockage of direct sunlight. One indicator that blockage is sufficient is when objects do not cast a shadow in the area of blocked sunlight. Shade is not adequate when heat in the area of shade defeats the purpose of shade, which is to allow the body to cool. For example, a car sitting in the sun does not provide acceptable shade to a person inside it, unless

the car is running with air conditioning. Shade may be provided by any natural or artificial means that does not expose employees to unsafe or unhealthy conditions, and that does not deter or discourage access or use.

- **"Temperature"** means the temperature in degrees Fahrenheit obtainable by using a thermometer to measure the outdoor temperature in an area where there is no shade. While the temperature measurement must be taken in an area with full sunlight, the thermometer should be shielded while taking the measurement, e.g., with the hand or some other object, from direct contact by sunlight.
- **"Provision of water"** means that employees shall have access to potable drinking water. The water will be fresh, pure, suitably cool, and provided to employees free of charge. The water shall be located as close as practicable to the areas where employees are working. Where drinking water is not plumbed or otherwise continuously supplied, it shall be provided in sufficient quantity at the beginning of the work shift to provide one quart per employee per hour for drinking for the entire shift. Employers may begin the shift with smaller quantities of water if they have effective procedures for replenishment during the shift as needed to allow employees to drink one quart or more per hour. The frequent drinking of water shall be encouraged.

Water Distribution Plan

Bottled water is provided on site to employees working for sPower. All sPower subcontractors are required to provide a written Heat Illness and Water Distribution Plan, as well as the required potable water and ice for their personnel on site daily.

If temperatures reach 80 degrees or higher, shade structures shall be provided on site so that any employee can take a cool off break, sit down and consume water with a place to sit in a posture as to allow the body temperature to cool down.

Means and Methods for Providing Drinking Water to All Employees

1. The foreman will ensure that there is always a minimum of two quarts per employee per hour in the work area during the shift. This can be achieved by having bottled water chilled in coolers or using 5 to 10-gallon jugs.
2. If water jugs or bottled water is unavailable, all employees will be furnished a camelback for drinking water purposes prior to going to work.
3. When the temperature exceeds 90 degrees the employees will ensure an ample supply of water is readily available.
4. The supervisor must ensure that the drinking water moves as the work does.
5. The supervisor is responsible for properly cleaning water jugs at a minimum every shift. Cleaning must be in accordance with the water jug cleaning procedure. If camelbacks are in use, the employee is responsible for care and cleaning.
6. The supervisor will announce all drinking water locations in the daily toolbox meeting. When the temperature is expected to be over 90 degrees the supervisor will discuss signs and symptoms, hydration, and other pertinent heat illness topics.

7. When the temperature is 95 degrees or more the O&M Manager or designee will increase the number of mandatory water drinking breaks.
8. During the site-specific safety orientation, the importance of frequently drinking water will be stressed.

Procedure to Access Shade

1. When the ambient temperature is 80 degrees or greater shaded areas are required in the work area.
2. Each foreman is will be given enough shade tents to cover 75 percent of their employees at the same time.
3. The foreman will also be given picnic tables, chairs, or benches so the employees will have a place to sit under the shade tent.
4. The interior of a vehicle may only be considered a shaded area if the air conditioning is both on and works properly.
5. The foreman will make the employees aware of the shaded locations in the daily toolbox meeting. They will also make sure that the shade areas move with the workforce.

Handling a Heat Wave

1. During a heat wave or heat spike (increase in afternoon temperature of more than 10 degrees) the site will be closed, and the work will need to be rescheduled or done at night.
1. If the work cannot be completed at a later date or at night the foreman will hold an emergency tailgate meeting to inform all employees of the heat conditions, emergency response procedures, and mitigation techniques (more frequent breaks, shade, increase water consumption, etc).

High Heat Procedures

1. The O&M Manager will ensure effective communication by voice, observation, or electronic means is maintained so that employees can contact a supervisor when necessary.
2. Employees will monitor other employees for alertness and signs and symptoms of heat illness.
3. Fellow employees will police each other to ensure their co-workers are drinking water frequently throughout the shift. New employees will be assigned a “buddy” or experienced coworker for the first 14 days of the employment.

Acclimatization

Acclimatization is the temporary and gradual physiological change in the body that occurs when the environmentally induced heat load to which the body is accustomed is significantly and suddenly exceeded by sudden environmental changes. In more common terms, the body needs time to adapt when temperatures rise suddenly, and an employee risks heat illness by not taking it easy when a heat wave strikes or when starting a new job that exposes the employee to heat to which the employee’s body has not yet adjusted.

Inadequate acclimatization can imperil anyone exposed to conditions of heat and physical stress significantly more intense than what they are used to.

Employers are responsible for the working conditions of their employees, and they must act effectively when conditions result in sudden exposure to heat their employees are not used to.

Acclimatization Procedures

1. sPower Team will monitor the weather and in be on the lookout for sudden heat wave(s) or increases in temperatures to which employees have not been exposed to for several weeks or longer.
2. During the hot summer months, the work shift will start at first light.
3. For new employees, foreman will try to find ways to lessen the intensity of the employees work during a two-week break-in period (such as scheduling slower paced, less physically demanding work during the hot parts of the day and the heaviest work activities during the cooler parts of the day (early-morning or evening)). Steps taken to lessen the intensity of the workload for new employees will be documented.
4. New employees will remain vigilant and alert for the presence of heat related symptoms.
5. New employees will be assigned a “buddy” or experienced coworker to watch each other closely for discomfort or symptoms of heat illness.
6. O&M teams will observe closely (or maintain frequent communication via phone or radio) and be on the lookout for possible symptoms of heat illness.
7. sPower site orientation for employees and supervisors will include the importance of acclimatization, how it is developed and how these company procedures address it.

Alternate High Heat Work Schedule

When ambient temperatures remain at and exceed 95 degrees the O&M Manager or his designee will shall discuss revisions to the work schedule (start time, end-of-shift time, multiple shifts with varying start times). When the alternate high heat schedule is in effect, personnel will meet each morning to go over the following items:

Heat Index 1 Heavy physical work acclimated worker	Response	Heat Index 2 Moderate physical work, OR Light physical work, unacclimated
89-95 F 25-29 C	<ul style="list-style-type: none"> Supply water to workers on an “as needed basis” 	77-84 F 25-29 C
97-102 F 36-39 C	<ul style="list-style-type: none"> Post Heat Stress Alert notice Encourage workers to drink extra water Start recording hourly temperature and relative humidity 	85-93 F 30-33 C
104-108 F 40-42 C	<ul style="list-style-type: none"> High Heat Procedures in effect notice Notify workers to consume more water Ensure workers are trained to recognize symptoms 	95-99 F 34-37 C
109-111 F 43-44 C	<ul style="list-style-type: none"> Provide 15 minutes’ relief per hour Provide adequate cool (50-59 F / 10 C) water At least 1 cup (240 mL) water every 20 minutes Workers with symptoms should seek medical 	101-102 F 38-39 C
113-115 F 45-46 C	<ul style="list-style-type: none"> Provide 30 minutes’ relief per hour in addition to the provisions listed previously 	104-108 F 40-42 C
117-120 F 47-49 C	<ul style="list-style-type: none"> If feasible provide 45 minutes’ relief per hour in addition to provisions listed above If a 75% relief period is not feasible then stop work until the Heat Index is 107 F / 42 C or less 	109-111 F 43-44 C
122 F and above 50 C	<ul style="list-style-type: none"> Stop work until Heat index is 107 F/42 C or less 	113 F and above 49 C

Procedures for Monitoring Weather

- The Safety Department will supply the weather forecast one day prior to the construction team so the superintendents and supervisor can plan the necessary HIPP mitigation techniques.
- The Safety Department will monitor the weather throughout the day via internet, weather channel or other weather app.
- Prior to each workday in the daily management meeting the management team will use the forecast to dictate work schedules based upon human health risk with regards to performing work in direct sunlight

4. If the site reaches temperatures of 95 degrees or greater the sPower O&M Manager must ensure that all High Heat Procedures are implemented.

Handling a Sick Employee

1. When an employee displays possible signs or symptoms of heat illness, the sPower O&M Manager will be notified. An employee trained in first aid will check the sick employee and determine whether resting in the shade and drinking cool water will suffice or if emergency service providers will need to be called.
2. Do not leave a sick worker alone in the shade, as he or she can take a turn for the worse!
3. Call emergency service providers immediately if an employee displays signs or symptoms of heat illness (loss of consciousness, incoherent speech, convulsions, red and hot face), does not look OK or does not get better after drinking cool water and resting in the shade.
4. While the ambulance is in route, initiate first aid (cool the worker: place in the shade, remove excess layers of clothing, place ice pack in the armpits and groin area and fan the victim).
5. Do not let a sick worker leave the site, as they can get lost or die (when not being transported by ambulance and treatment has not been started by paramedics) before reaching a hospital!
6. If an employee does not look OK and displays signs or symptoms of severe heat illness (loss of consciousness, incoherent speech, convulsions, red and hot face), and the worksite is located more than 20 min away from a hospital, call emergency service providers, communicate the signs and symptoms of the victim and request Air Ambulance.
7. When the temperature exceeds 85 degrees, the O&M team members will hold short 'tailgate meetings to review the weather report, reinforce heat illness prevention. Be on the lookout for signs and symptoms of heat illness and inform them that shade can be made available upon request.
8. The O&M Manager will assign new employees a "buddy" or experienced coworker to ensure that they understood the training and follow company procedures.

Procedures for Employee and Supervisory Training

1. sPower will ensure that all supervisors are trained prior to being assigned to supervise other workers. Training will include this company's written procedures and what steps supervisors will follow when employees' exhibit symptoms consistent with heat illness.
2. sPower will ensure that all employees and supervisors are trained prior to working outside. Training will include the site-specific orientations, lunch and learns, and tool box topics.
3. sPower Safety Manager will train employees on the steps that will be followed for contacting emergency medical services, including how they are to proceed when there are non-English speaking workers, how clear and precise directions to the site will be provided as well as stress the need to make visual contact with emergency responders at the nearest road or landmark to direct them to the worksite.

Procedures for Emergency Response

1. Prior to assigning a crew to a particular worksite, the O&M Manager will ensure that a qualified, appropriately trained and equipped person will be available at the site, to render first aid if necessary.
2. All O&M team members will carry 2-way radios and cell phones, to ensure that emergency medical services can be called and check that these are functional at the worksite prior to each shift.
3. When an employee is showing symptoms of possible heat illness, the supervisor will take immediate steps to keep the stricken employee cool and comfortable once emergency service responders have been called (to reduce the progression to more serious illness).
4. During a heat wave or hot temperatures, workers will be reminded and encouraged to immediately report to their supervisor any signs or symptoms they are experiencing.
5. sPower site specific orientation for employees and supervisors will include every detail of these written emergency procedures.

4. High Wind Events

When a high wind advisory is issued, dust control measures will be increased in preparation for the event. Operations shall be curtailed, if necessary, during high wind events to reduce the possibility of dust traveling offsite. If it is necessary to curtail operations, prior to leaving the site dust suppressant will be applied as necessary to prevent fugitive dust. If the high wind event covers the weekend the Subcontractor is required to keep whatever is needed to control any dust from leaving the site.

5. Lightning

Due to the hazards associated with lightning, Work activities on site will be adjusted per instructions below based on activity in the vicinity of the site. All site personnel shall adhere to these instructions.

Lightning Safety Requirements:

The O&M Team on the site is responsible for lightning monitoring. Lightning monitoring shall be documented on a "lightning log" to ensure adequate monitoring and response to site activity. When lightning activity threatens the site, the following incremental steps will be taken to minimize personnel exposure:

1. Criteria: Lightning detected at 30 miles.
 - Notify site personnel of increased lightning hazard.
 - Prepare to cease outdoor activity.
2. Criteria: Lightning detected at 10 miles.
 - Cease outdoor activity other than securing equipment.
 - Personnel not occupied with securing equipment will move to designated shelters.
3. Criteria: Lightning detected at 7 miles.
 - Immediate cessation of all outdoor activity. Abandon efforts to secure equipment if not completed.
 - All personnel take cover in designated shelter.

A Stand-Down (i.e., stop work) will last for 30 minutes from the last lightning within the 10-mile radius.

NOTE: If a crane is on site, lower the crane boom if possible and safe to do so. If the storm is moving fast towards the Project Site, make sure there is enough time to lower the boom safely.

Reference: National Safety Institute

6. Media Statements

PURPOSE

Establish an organized media function to report up-to-date and accurate information on events involving personal injury or damage to property or equipment that is significant enough to prompt possible interest by news media or other persons outside the company.

PROCEDURE

1. The sPower O&M Manager or his/her designee will handle ALL media activities. If individual cannot be reached at (605) 212-0032, contact the sPower Safety Manager at (661) 371-6019
2. The presence of all news media (reporters, photographers, etc.) must be reported to the sPower immediately. No media representatives will be permitted on the property unless prior approval is given by sPower O&M Manager and the person(s) is escorted by the sPower personnel. Emergency Response Team will help coordinate site access.
3. As soon as the details of the incident are available and a decision can be made on what should be released to the press, this information will be given out by the sPower O&M Manager or his/her designee.
4. Arrangements must be made by the sPower O&M Manager for photos of the affected areas for our records and for possible release to news media. Every effort must be made to protect company interest in print as well as in photographs.

It is important that only the sPower O&M Manager or his/her designee make statements and comments about any undesired event.

7. Job Site Demonstration or Protest

PURPOSE

Ensure employee safety and minimize disruption of sPower operations.

Management must ensure the safety of employees and minimize the potential for an incident. Unauthorized visitors are not permitted in private buildings, facilities or in the active Construction areas.

PROCEDURE

Anyone who observes unauthorized visitors must immediately notify:

- Their Supervisor
- O&M Manager (605) 212-0032
- Safety Manager (661) 371-6019

Members of the public may express their opinions as a right of free speech and can congregate in public areas.

- sPower management will monitor demonstrators.
- Employees should not attempt to intervene or stop the demonstration.
- If such activities pose a potential safety hazard, all Construction activities must cease immediately until the matter is resolved.
- The matter will then be placed in the hands of local Police, and or the Bon Homme County Sheriff's Department.

All media should be referred to the O&M Manager or another spokesperson designated by him/her.

8. Violence in The Workplace

PURPOSE

The purpose of this sPower Workplace Violence Protocol is to clarify the responsibilities and procedures when there is a “live” workplace violence incident (“WVI”) at a sPower worksite. This Protocol is intended to supplement existing company policies on workplace violence, drug and alcohol use, standards of conduct and associate discipline.

PROTOCOL

The five components of this protocol are:

1. STAY SAFE
2. DEFUSE
3. REPORT
4. PREVENT
5. DELAY

SAFETY FIRST Nothing in any sPower policy requires you to put yourself in harm’s way!!

STAY SAFE – When there is a WVI, how do you decide whether to “get involved”? And what does it mean to “get involved”?

- Getting Involved means doing something to defuse, report, prevent or delay the occurrence (or continuation) of a WVI.
- Engagement: Please Get Involved when (i) You are the best or only person for a task, and (ii) You reasonably believe you can Get Involved without causing injury (or further injury) to yourself and others.
- When choosing whether to first defuse, report, take preventive action, or delay further violence consider whether there is a risk that taking the action will further escalate the WVI. When it is unclear, choose the course of action (or inaction) that is most likely to keep the most people safe with the least risk of further escalation.

DEFUSE – When you are in the middle of a WVI, the key to avoiding injury (or further injury) is to defuse the situation by calming down the threatening/violent person.

IMPORTANT: The goal is not necessarily to get the person to leave the site. Remember, an individual who leaves the site but remains upset will find a way to continue the violence (either by returning to the site or seeking a remedy at a different location).

Who Should Defuse? Where there is a choice, the best person to defuse the situation is someone who (i) has been trained in defusing WVIs (or has a well-known capability for being able to defuse these types of situations), (ii) is not the source of the grievance giving rise to the WVI (e.g., supervisor, member of management). Often the construction manager is the person who can best serve in the role ... but if the

individual is upset because of a write-up following a safety incident, a better diffuser might be a friend or a neutral person.

How to Defuse? While every situation is different, there are some commonly understood guidelines.

Note of caution: If you are the diffuser, do not allow yourself to be blocked in. Keep a clear path to the exit.

If there is a Hostage Situation. Hostage situations add an additional dynamic to a WVI. Defuse the situation but be sure to also (i) contact the Police (without delay), and (ii) reach out to sPower Safety Manager, Terry Barnhill (661) 371-6019

REPORT – When making a report or calling for assistance, convey the following information:

- The identity of the aggressor, victims and anyone else involved
- The background (i.e., what lead up to the incident, what time did the WVI begin if known)
- The location (give specific location information to the police (including potential hazards, so that they can tailor their response accordingly)

Who to Notify and When:

POLICE (CALL 9-1-1): Hurting or threatening to harm another person is a crime in every jurisdiction in which we operate. Regardless of whether anyone will “press charges”, we will want a police report.

When do you call the police? Before or after you try to defuse the situation? This can be a dilemma especially because (i) bringing in the police can escalate a situation, and (ii) due to the remoteness of our sites, any delay in calling the police can actually result in further harm if the situation cannot be defused. In the end, it is a judgment call. Here are some guidelines.

If someone is seriously injured, the police must be called to ensure the injuries get prompt medical attention.

If the site is remote, call the police even if there are no serious injuries. Should the situation escalate, any delay may mean the difference between life and death. Advise the police of the situation (e.g., that we are trying to defuse the situation and they should not arrive with sirens blaring).

If you reasonably believe that the situation may not defuse and someone will get hurt, call the police.

If there is a hostage situation, Contact the police first. Then, contact sPower O&M Manager as there are additional resources that may be available.

If a situation becomes unstable (violence is occurring that appears cannot be defused, delayed or prevented, move others and yourself to a safe area.

If others gather to watch an actual or potential WVI, disperse the people by telling them to leave. The presence of gawkers can increase the likelihood of escalating a situation.

SITE MANAGEMENT: sPower O&M Manager should be notified immediately of any WVI.

WHO ELSE? It is the responsibility of all sub and sub tier contractor staff to ensure notice of a WVI is provided to:

- Security (Site security, if applicable) sPower O&M Manager
- sPower Safety Manager
 - If worker involved is not a sPower employee, separate notice to the employer of the worker (e.g., sub-contractor) is required.

If workplace injury:

PREVENT – Prevention includes actions you take to prevent (i) Escalation, (ii) Injury, and (iii) Recurrence.

Preventing Escalation – Avoid unnecessary confrontations that will escalate rather than defuse a WVI. Potential hot button issues include:

The sPower Management prohibits any subcontractor employee who was involved in an adverse event i.e., Workplace Violence Incident must submit to a 5-Panel drug/alcohol test as soon as practicable (performed by an independent, accredited drug/alcohol testing laboratory per USA DOT standards). The subcontractor shall provide sPower Safety Manager with the name of the testing facility and results of the drug/alcohol test.

sPower insists upon the opportunity to review drug/alcohol test results prior to the employee's return to work on the site.

- Do not bother to conduct a reasonable suspicion drug test where (i) the test can and will be performed by the police; or (ii) a worker has injured another worker (i.e., it is not necessary to add another ground for dismissal where behavior is clearly unacceptable and may complicate rather than enhance any adverse employment action).

SUSPENSION NOT DISMISSAL

- Do NOT immediately dismiss a worker engaged in a WVI. Instead suspend the worker pending investigation of all relevant facts and circumstances and then involve Human Resources and Legal before making a final determination. When suspending the worker, advise the worker to leave behind Company-provided access badges, keys, materials, equipment, tools (e.g., including Company car, computer etc.). It is ok to allow the worker to hold on to a Company-provided cell phone or blackberry. (If the aggressor is employed by a subcontractor, request the subcontractor take the same approach for the safety of all involved). Be sure also to advise the worker:

Investigation: We will conduct a full and fair investigation.

Contact Information: Provide a contact phone number for questions on timing and the results of the investigation. If the worker is an sPower associate, this should be someone in Human Resources.

Stay Off Site/Stop Work: Be clear that the worker should not work or come to the site pending the results of the investigation.

- Preventing Injury – Seek to prevent injuries to individuals both on and offsite.
- SITE SECURITY – If applicable, use site security to intervene (where appropriate) and/or to keep others away from the WVI.

- GETTING HOME – If you have a reasonable suspicion that the worker is under the influence of alcohol or drugs, send the worker home in a cab or arrange for a neutral party to take him/her home and bring the worker’s vehicle to him/her at another time.
- LOOK FOR AN ESCAPE ROUTE – If talking to the aggressor during a WVI, do not get trapped. Make sure you keep a clear path to the exit.
- Preventing Recurrence – Take away temptations to engage (or continue to engage) in violent activity.
- DRUG/ALCOHOL TEST – If reasonable suspicion that an sPower associate is under the influence of drugs or alcohol, the police will not be called or are unlikely to test, and the associates’ conduct taken on its face is ambiguous (i.e., not in itself grounds for dismissal), contact vendor (or if no vendor, on site trained personnel) to perform an onsite drug/alcohol screening.
- IF NOT DEFUSED, KEEP ON SITE? – If you send away an angry worker without first defusing the situation, the situation may continue to get worse and recur:

Evaluate the likelihood that the worker will come back to the site (or back to the individual off site) to continue the argument.

Evaluate the likelihood that a worker permitted to drive home might instead use the car to destroy property or use the car as a weapon and run someone over.

- FEEDBACK; SUPPORT – If you have sent someone away with a promise of a full and fair investigate, investigate and give feedback promptly. If you anticipate that the results of the investigation will not be well-received consider ways of providing support to the individual (e.g., offer counseling through the employee assistance program).

WHAT ELSE MIGHT PREVENT RECURRENCE OF THE WVI?

- Pressing charges
- Orders of protection

DELAY – If violence (or further violence) appears unpreventable and defusing techniques do not appear to be working, do what you can to delay the inevitable (to give more time for assistance to arrive). Delay tactics that work will depend on the situation. For example, if the aggressor is willing to keep talking, keep him/her talking.

When the WVI is under control and the aggressor is defused and been removed from the site:

- sPower will conduct a meeting with all sPower team member s and contractors to help with the investigation process and for lessons learned.

9. Surviving An Active Shooter

PURPOSE

Establish a procedure to help protect workers from an active shooter.

Be prepared and aware of your surroundings: Although these types of events are rare, it still makes sense to consider your options ahead of time. People who pre-plan are generally more likely to respond appropriately if and when an unplanned event does occur.

Take time to understand the environment you are in before an emergency occurs: Make mental note of where the main exits and emergency exits are located.

Ask yourself, "What if?" During an assault, you may have 2 or 3 Options Flee or Hide. Taking on the assailant is not an appropriate option.

OPTION #1

Flee - if you can escape safely, do it, this is generally the best option. Get to a safe place and call for help.

- Follow your instinct.
- Leave anything that is replaceable behind.
- Call 911 and get law enforcement in route.
- DO NOT head towards the Shooter to get to your car.

OPTION #2

- Hide - if you are unable to flee, try to get out of the shooter's line of sight
- Find something to hide behind – this will give you additional protection
- Find a room that locks if you can and lock the door
- Blockade the door with furniture or other heavy objects.
- Shut off lights, close curtains, hide behind/under furniture and stay quiet.
- Call 911 to get help on the way. Stay on the floor, away from doors or windows.
- Make a plan with others in the room about what you will do if the shooter enters.

While in a meeting room, or office

- If you are in an office or meeting room, STAY THERE, secure the door.
- If the door has no lock and the door opens in, a good heavy door wedge can be kept on hand and driven in as hard as you can, otherwise look for heavy furniture to barricade the door.
- If the door has a window, cover it if you can. Depending on the gunman's location, consideration may also be made to exit through windows. Have someone watch the door as you get as many employees out the windows (ground floor) as calmly and quietly as possible.
- If the windows do not open, or you cannot break them, or you are not on a ground floor, get out of sight from the door and stay low and quiet.
- If no police units are on scene move well away from the incident and find safe cover positions and wait for the police to arrive.
- When officers arrive on scene, managers and supervisors should attempt to move as many employees as they can toward any police vehicle, when safe to do so, while instructing the employees to keep their hands on top of their head, and following the directions of the police.

- Do not leave the area entirely; you may have information that responding police officers will need. Once in a safe place stay put.

Trapped with the gunman

- If you are trapped, do not do anything to provoke the gunman. If no shooting is occurring, do what the gunman says and do not move suddenly. Only you can draw the line on what you will or will not do to preserve your life and the lives of others.
- If the gunman does start shooting people, you need to make a choice (at this point it is your choice): stay still and hope they do not shoot you; run for an exit while zigzagging; or even attack the shooter. This is very dangerous, but certainly no more so than doing nothing in some cases. A moving target is much harder to hit than a stationary one and the last thing the shooter will expect is to be attacked by an unarmed person. Any option chosen may still result in a negative consequence.
- Again, this is not a recommendation to attack the shooter but rather a CHOICE to fight when there is no other option.

Open Spaces (outside)

- When in open areas stay alert and look for appropriate cover locations. Brick walls, large trees, retaining walls, parked vehicles, fire hydrants, or any other object which may stop, or even deflect, bullet penetration may be used as cover. If there is nothing close by lay flat on the ground, do not move.

Reporting to Law Enforcement

When reporting an active shooter to the police the caller should remain as calm as possible, give exact and correct information as follows:

Report to 911 that you have an “ACTIVE SHOOTER” – this immediately alerts all police and law enforcement units in the area.

Give your name, address, and telephone number to the dispatcher – DO NOT HANG UP unless; you are in imminent danger from the suspect. You are law enforcement’s “eyes and ears”.

Try to describe the shooter’s physical appearance – Male or female, height, weight, color of hair, facial hair, build – heavy, slender, medium, clothing description, what kind of weapons are being used - handgun or long gun, any backpacks or containers (extra ammo or weapons) being used by the shooter. Give an exact location of shooter (if known) as well as any other information that may be asked for by law enforcement.