

SUN STEEL TREATING INC.

EMERGENCY CONTINGENCY PLAN

Purpose

Sun Steel Treating, Inc. (SST) is dedicated to the protection of its employees from emergencies, such as tornadoes and fire. When emergencies do occur, the SST Emergency Action Plan (EAP) is initiated. This EAP is in place to ensure employee safety from emergencies at any time of day and night. It provides a written document detailing and organizing the actions and procedures to be followed by employees in case of a workplace emergency.

OSHA's Emergency Action Plan requirements, found at Sec. 1910.38, requires SST to have a written Emergency Action Plan (EAP). This plan applies to all operations at SST where employees may encounter an emergency situation.

The EAP communicates to employees, policies and procedures to follow in emergencies. This written plan is available, upon request, to employees and any OSHA officials who ask to see it.

Administrative Duties

The CEO is the EAP administrator, who has overall responsibility for the plan. This responsibility includes the following;

1. Developing and maintaining a written Emergency Action Plan for all hours, day and night, work conditions;
2. Notifying the proper rescue and law enforcement authorities in the event of an emergency affecting the facility;
3. Taking security measures to protect employees;
4. Integrating the Emergency Action Plan with any existing general emergency plan covering the buildings or work areas occupied;
5. Distributing procedures for reporting emergencies, the location of safe exits, and evacuation routes to each employee;
6. Conducting training to acquaint employees with emergency procedures and to judge the effectiveness of the plan;
7. Training designated employees in emergency response such as the use of fire extinguishers and the application of first aid;
8. Deciding which emergency response to initiate (evacuate or not);
9. Ensuring that equipment is placed and locked in storage rooms or desks for protection, if applicable;

10. Maintaining records and property as necessary, and

11. Ensuring that SST facilities meet all local fire codes, building codes, and regulations.

The CEO is responsible for reviewing and updating the plan as necessary. Copies of the plan may be obtained from the CEO.

The CEO has full authority to decide to implement the EAP if an emergency threatens human health. The following potential emergencies might reasonable be expected at our facilities and thus call for the implementation of this EAP:

- Molten salt spill due to furnace failure.
- Localized fire from combustibles coming in direct contact with extreme heat, such as torches and hot metal parts.
- Failure of compressed gas bottles or tanks, including, but not limited to, hydrogen and nitrogen (stored outside), anhydrous ammonia (ion department), oxygen and acetylene (maintenance and customer service departments), and methyl chloride (salt department).

The CEO can designate additional personnel who can be contacted regarding further information about the written Emergency Action Plan or an explanation of duties under this plan.

Key management personnel home telephone numbers are kept in the Safety and Hazard Communications binders available in each of the department floor offices. These telephone numbers include:

- ❖ James D. McGuirk, Jr.
Telephone number 1-810-750-2117
Cell number 1-810-210-7310
- James McGuirk III
Cell Number 1-810-210-7308
- Emergency Coordinator
Andrew Smith
Cell Number 1-248-653-4819

SST encourages suggestions to improve the plan because SST is committed to its success. SST strives for clear understanding, safe behavior, and involvement in the program from every level of the company.

Alarms

Different emergencies require different alarms to indicate what actions employees should take. SST has established an employee alarm system. If all day shift people were here at the same time (including 15 people from drivers and sales), there could be as many as 48 people in the 550 N Mill building. Drivers and customer service total 20 people. Direct voice communication is the means for alarming employees of an emergency. There is a tornado siren within close proximity to the shop, which can be easily heard. Also there is a paging system on each telephone that may be used to communicate evacuations.

Because SST uses a communication system as an alarm system, all emergency messages have priority over all non-emergency messages.

The following emergency telephone numbers are listed in the Safety and Hazard Communications binders in each of the department floor offices:

- ❖ South Lyon Fire Department
1-248-437-2616 or 911
Fire which cannot be controlled with portable fire extinguishers
- ❖ South Lyon Police Department
1-248-437-1773 or 911
Unauthorized visitors or other disturbance
- ❖ South Lyon Ambulance
1-248-486-9111 or 911
Urgent medical care
- ❖ Local Emergency Planning Commission (LEPC)
1-248-858-5300
Hazardous material release into ground, air, or surface water
- ❖ Providence Hospital – Novi
1-248-465-4170 or 911
Medical emergency

Any employee is authorized to make the call, based on their understanding of the issue at that time.

Emergency Procedures

(a) Whenever there is an imminent or actual emergency situation, the emergency coordinator (or his designee when the emergency coordinator is on call) must immediately:

- (1) Activate internal facility alarms or communication systems, where applicable, to notify all facility personnel; and

- (2) Notify appropriate state or local agencies with designated response roles if their help is needed.
- (b) Whenever there is a release, fire, or explosion, the emergency coordinator must immediately identify the character, exact source, amount, and areal extent of any released materials. The emergency coordinator may do this by observation or review of the facility records or manifests and, if necessary, by chemical analysis.
- (c) Concurrently, the emergency coordinator must assess possible hazards to human health or the environment that may result from the release, fire, or explosion. This assessment must consider both direct and indirect effects of the release, fire, or explosion (*e.g.*, the effects of any toxic, irritating, or asphyxiating gases that are generated, or the effects of any hazardous surface water run-offs from water or chemical agents used to control fire and heat-induced explosions).
- (d) If the emergency coordinator determines that the facility has had a release, fire, or explosion which could threaten human health, or the environment, outside the facility, the emergency coordinator must report the findings as follows:
- (1) If the assessment indicates that evacuation of local areas may be advisable, the emergency coordinator must immediately notify appropriate local authorities. The emergency coordinator must be available to help appropriate officials decide whether local areas should be evacuated; and
- (2) The emergency coordinator must immediately notify either the government official designated as the on-scene coordinator for that geographical area, or the National Response Center (using their 24-hour toll free number 800/424-8802). The report must include:
- (i) Name and telephone number of reporter;
- (ii) Name and address of the generator;
- (iii) Time and type of incident (*e.g.*, release, fire);
- (iv) Name and quantity of material(s) involved, to the extent known;
- (v) The extent of injuries, if any; and
- (vi) The possible hazards to human health, or the environment, outside the facility.
- (e) During an emergency, the emergency coordinator must take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the generator's facility. These measures must include, where applicable, stopping processes and operations, collecting and containing released hazardous waste, and removing or isolating containers.
- (f) If the generator stops operations in response to a fire, explosion or release, the emergency coordinator must monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment, wherever this is appropriate.

(g) Immediately after an emergency, the emergency coordinator must provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility. Unless the generator can demonstrate, in accordance with [§ 261.3\(c\)](#) or [\(d\) of this chapter](#), that the recovered material is not a hazardous waste, then it is a newly generated hazardous waste that must be managed in accordance with all the applicable requirements and conditions for exemption in [parts 262, 263, and 265 of this chapter](#).

(h) The emergency coordinator must ensure that, in the affected area(s) of the facility:

(1) No hazardous waste that may be incompatible with the released material is treated, stored, or disposed of until cleanup procedures are completed; and

(2) All emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations are resumed.

(i) The generator must note in the operating record the time, date, and details of any incident that requires implementing the contingency plan. Within 15 days after the incident, the generator must submit a written report on the incident to the Regional Administrator. The report must include:

(1) Name, address, and telephone number of the generator;

(2) Date, time, and type of incident (*e.g.*, fire, explosion);

(3) Name and quantity of material(s) involved;

(4) The extent of injuries, if any;

(5) An assessment of actual or potential hazards to human health or the environment, where this is applicable; and

(6) Estimated quantity and disposition of recovered material that resulted from the incident.

Emergency Reporting

In the event of a fire, explosion, or other release of hazardous waste or hazardous waste constituents that could threaten human health or the environment or if the large quantity generator has knowledge that a spill has reached surface water or groundwater, the large quantity generator is required to immediately notify EGLE by calling the Pollution Emergency Alert System at 800-292-4706 and share the following information:

1. The name and telephone number of the person who is reporting the incident.
2. The name, address, telephone number, and site identification number of the large quantity generator.
3. The date, time, and type of incident.
4. The name and quantity of the material or materials involved and released.

5. The extent of injuries if any.
6. An estimated quantity and disposition of recovered materials that resulted from the incident if any.
7. An assessment of actual or potential hazards to human health or the environment.
8. A description of the immediate response action taken.

Emergency reporting and weather monitoring procedures

Evacuation emergency: When employees detect an emergency that requires an evacuation, such as a fire or hazardous spill, they should exit the building immediately, utilizing the nearest exit that is safe to use. Call the appropriate emergency responder listed above. Anyone can make the call.

Tornado emergency: The tornado siren nearby will sound the possibility of a tornado coming to this vicinity. If possible, tune in to a weather channel for more accurate, up-to-date information. The safest place to be is the south building, in the southwest corner of the basement (under ion 12 and the ion staging area). The ceiling overhead is a substantial metal plate. Keep away from all doors.

Evacuation procedures

Some evacuations may require evacuation or escape procedures, while others require employees to stay indoors, or in a safe area. SST escape procedures are designed to respond to many potential emergencies (i.e., fire, explosion, weather, or chemical spill), depending on the degree of seriousness. Nothing in these procedures precludes the CEO's, or designates', authority in determining whether employees should remain inside or evacuate.

Employees need to know what to do if they are alerted to a specific emergency. After an alarm is sounded to evacuate, employees should proceed to the nearest exit that is safe to use. See the attachments to this plan for the building floor plans with exits clearly indicated. It is everyone's responsibility to be aware of the nearest exit at all times.

Once evacuated, employees are to move directly to the safe area, which is the water tower on the west side of the street. Please note: this is a change from the long-established location of the parking area between the two buildings. Cell phones may be used to communicate during an evacuation along with overhead paging system.

Procedures to account for employees

Designated personnel assist in safe and orderly evacuation for all types of emergencies that require evacuation. Once evacuation is complete, they conduct head counts by department. They are also responsible for checking rooms and other enclosed spaces in the workplace for employees who may be trapped or otherwise unable to evacuate the area. They will make the determination if it is safe to do

so. Otherwise, they must wait for trained response personnel to arrive on the scene. Senior department members are to assist in the head count, as they would be most likely aware of employees (or perhaps suppliers or customers) working in their area. Head counts may be given to first responders, if requested.

No employees are to return to the buildings until advised by the designate. This, of course, after determination by the first responders that such re-entry is safe. If anyone is injured, first aid will be administered by trained personnel, within their capabilities. If the emergency incident expands or persists, the CEO or designate may send employees home by normal means or provide them with transportation.

Training

The CEO or EAP designate reviews the Emergency Action Plan with each of SST's employees at the following times:

- Initially when the plan is developed,
- Whenever a new employee is hired,
- Whenever the employee is assigned initially to a job,
- Whenever an employee's responsibilities or designated actions under the plan change,
- Whenever new equipment, materials, or processes are introduced into the workplace,
- Whenever the design or layout of the facility changes, and
- Whenever the plan is changed.

The information in this plan is not intended for casual reading, but is intended to get the appropriate message across. This material for training purposes is communicated through a briefing with small groups of employees, followed by discussion.

Emergency Equipment

List of available emergency equipment:

- 1) 34 portable fire extinguishers 15# at 550 N Mill St
- 2) 7 portable fire extinguishers 15# at 600 N Mill St
- 3) 2 Larger portable fire extinguishers 20# at 550 N Mill St
- 4) 1 150# fire extinguisher on wheels by lon #7
- 5) 8 fire extinguishers 25# on all hi-lo's
- 6) 2 Full Face respirators with canister filter located in maintenance

- 7) Paper respirators for dust and fumes located in each department
- 8) Disposable protective overalls in customer service
- 9) 8 spill kits
 - a. 3 located in vacuum building
 - b. 1 in salt bath
 - c. 2 in the generator room
 - d. 1 behind Ion #11
 - e. 1 next to salt dumpster
 - f. 1 next to blast machine dust collector
 - g. 1 next to outside dust collector
- 10) All spill kits are equipped with 75 spill pads, 2 10ft absorbent dike, 12 46" absorbent sock, 6 10ft absorbent sock, 7 17X16X2 inch absorbent pillows, 10 large disposal bags

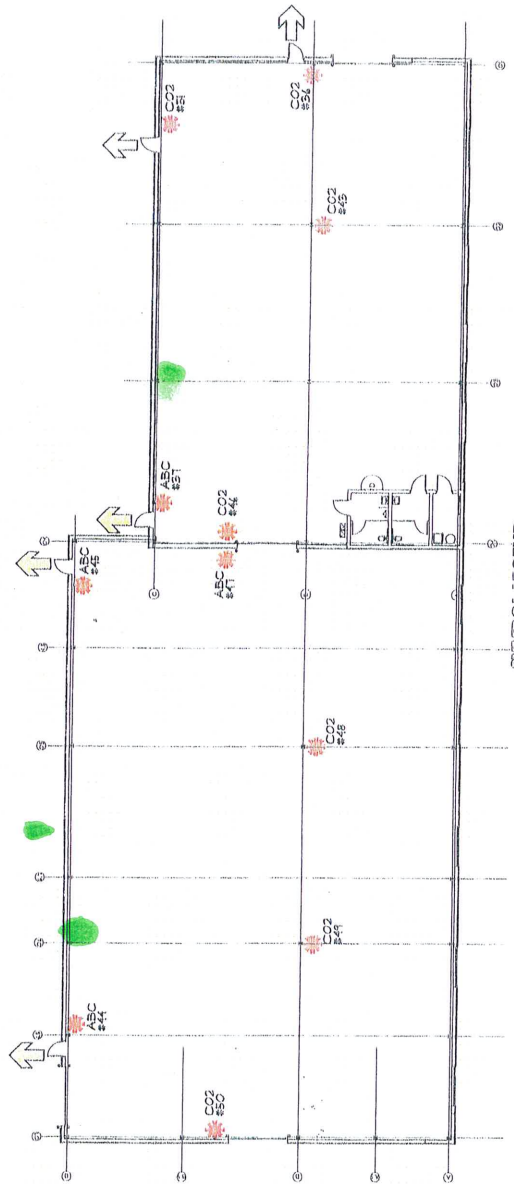
This plan is reviewed annually and amended whenever changes occur that will significantly affect the ability of this facility to respond to an emergency situation. This includes revision of the regulations, if the plan fails in an emergency, if this facility changes in a way that materially increases the potential for an emergency or changes in the response necessary in an emergency, if the list of emergency coordinators changes or if the list of emergency equipment changes. When warranted, revisions are made to the plan within 24 hours.

MAIN LEVEL **FLOOR PLAN**

SUN STEEL TREATING, INC.
600 NORTH MILL STREET



NOT TO SCALE
REVISED: APRIL 2019



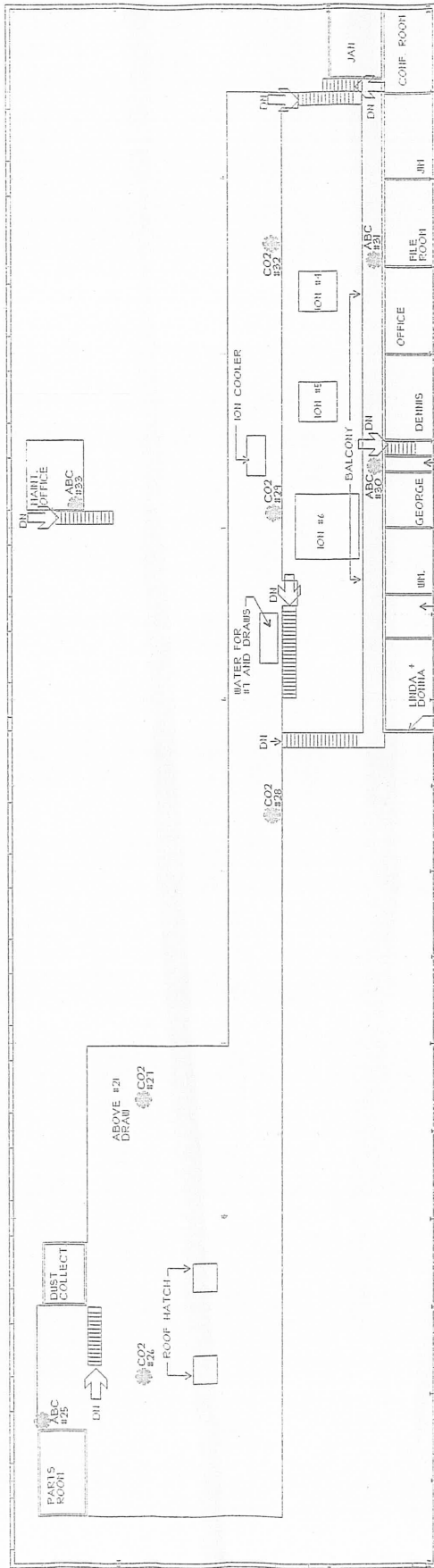
SYMBOL LEGEND



ABC / CO2
EXTINGUISHER / TYPE
NUMBER

SPILL
KIT
EYE WASH
and/or SHOWER

Spill kits



MEZZANINE/CATWALK FLOOR PLAN

SUN STEEL TREATING, INC.
550 NORTH MILL STREET

NOT TO SCALE
REVISED: OCTOBER 2013

SYMBOL LEGEND



EXIT

ABC / CO2
HOO

EXTINGUISHER / TYPE
HANDER

EYE WASH
HOO-S

EYE WASH and/or SHOWER
HANDER

