

DATE: December 16, 2015

SUBJECT: Emergency Response Procedure

The following pages contain the policies adopted by the Nowland Associates, Inc. Safety Committee to aid in properly responding to disasters or emergencies.

These policies and procedures may not contain all of the information needed with respect to every emergency situation; therefore, you must exercise good judgement and common sense when dealing with any emergency.

1. Emergency Contact Information

Emergency:	911
Main Office Phone:	(302) 731-1333
Matt Chapman:	(302) 218-6176
Jeff Nowland:	(302) 218-6167
Jim Nowland:	(302) 218-6169
Giff Nowland:	(302) 218-8201

2. Employee Training

All employees will be provided necessary training on the Emergency Response Procedure (ERP). Employee training will occur when:

- Upon initial hiring
- When work begins at a new job site.
 - Review of Overall ERP
 - Review of Jobsite specific ERP.
- When an employee is assigned / transferred to a new jobsite

3. Alarm System

In the event of an emergency requiring evacuation of all employees, several warning systems utilized, depending on the work site conditions or the emergency involved, including:

- Verbal Communication
- Vehicle Horn and/or Air Horns
 - Three (3) long blasts shall be used as a standard alert
- Building Alarm System

The lead employee will be responsible for sounding the alarm and locating any hearing impaired employees to ensure proper evacuation.

4. Emergency Evacuation

Lead employees will be responsible for evaluating new job sites in order to establish emergency evacuation routes and establishing a safe Meeting / Rally point. Employees located at the home office shall meet per the Emergency Evacuation Plans. (Exhibits A, B, C)

The following tasks will be carried out in the event of an emergency requiring evacuation.

- The lead or designated employee shall sound the alarm
- The lead or designated employee will instruct employees to contact emergency facilities and management, and proceed to the identified meeting / rally point to perform the necessary head count

- The lead or designated employee will be responsible for ensuring the jobsite is clear of all employees that have not been assigned to assist with the evacuation.

5. First Aid / Emergency Medical Services

Outside services will be the primary source of Emergency Medical Treatment (i.e., ambulance, medics, and fire department).

1st Aid Kits will be maintained and be readily accessible at all job sites. Contents of the First Aid Kit will adhere to requirements consistent with the number of employees working at the job site.

Lead employees will ensure that a suitable number of employees are certified to provide First Aid / Emergency Medical Services. This training will be coordinated with the Safety Committee.

Only certified employees will be allowed to perform First Aid / Emergency Medical Services. Action taken will only be to the extent deemed necessary to preserve life.

6. Rescue from Falls

- Lead Employee shall designate a 911 caller and alert the office.
- If someone experiences a fall, remember that time is of the essence when it comes to the rescue.
- If the fallen worker is conscious, immediately have him engage the relief step to improve circulation.
- Assess the situation and determine the most appropriate and effective rescue plan.

7. Fire and Explosion

Assess the situation:

- Any employee discovering a fire should quickly and carefully remove any person who is injured or in immediate danger, unless doing so will create the possibility of personal injury.
- Employees in the immediate vicinity of the fire, as well as those in surrounding areas, who may be threatened by the fire, must be notified of the existence of the fire.
- Only properly trained and authorized employees may attempt to extinguish a small fire, which does not involve electrical components or hazardous substance.
- If the fire appears to be too large, involves toxic substances, or is electrical based, all employees are to leave the area immediately and notify management

When the fire cannot be extinguished using a portable fire extinguisher:

- The lead employee will initiate the evacuation procedures.
- The fire will be reported to the appropriate agency(s).
- The emergency evacuation alarm will be sounded.
- Without creating exposure to personal injury, attempts should be made to contain the fire, by properly trained and designated employees only (i.e. closing doors and windows in the immediate vicinity and removing any flammable materials)

8. Earthquake

All employees will be instructed to:

- Move away from windows, temporary walls, partitions, freestanding and heavy objects.
- Duck or drop down to the ground.
- Attempt to take cover under fixed objects, or interior framing that may provide safety from falling objects.

- Avoid being near any electrical units, flammable or combustible materials.
- STAY PUT until the ground / structure stops shaking and it is safe to move.

9. Severe Weather

When severe weather is forecast, inspect the facility for the following items:

- Properly functioning sump pumps
- Roof clear of debris
- Gutters and downspouts clear of obstructions, debris
- Storm drains clear in parking lots and receiving areas
- Emergency generator, if applicable, is functional and tested recently
- Alarm systems are functional
- Clear the exterior of extra pallets, bales, etc.
- Secure items outside of the facility such as garbage cans, benches, etc.
- Emergency lighting is operational

As the severe weather approaches, do the following:

- Maintain communications with the Main Office.
- Establish communications with local first responders. Follow any instructions you are given.
- Cover windows with plywood or storm shutters.
- Remove or secure any temporary exterior signage.
- Back up all computer files and secure.
- Review emergency evacuation plans.
- If necessary, or as directed, shut down power and gas feeds.
- Keep informed as to weather conditions and other related emergency information via a battery-operated radio.
- Make sure in-house communications equipment is fully charged and operational.
- Keep a supply of batteries and flashlights ready for use by employees

If the weather causes damage, make a detailed report of property damages for insurance purposes.

10. Flood

An organized and immediate response to a flood can be instrumental in saving inventory and facilities from damage. Under some conditions, such as severe weather, flooding can be predicted to occur in some areas. Interior flooding brought about by a broken water line or sprinkler system activation cannot be predicted, but requires an immediate response nonetheless.

Most natural disasters, including floods, are usually forecast sufficiently in advance for emergency action to be initiated before the exposure becomes serious.

In most cases, advising employees of the approaching danger and seeing to it that they are in a safe location will be sufficient, should the incident occur during normal working hours.

When a flood is predicted:

- Make every effort to cut electrical power to the facility at the outset of the flood.
- Make every effort to move the inventory to a higher level when possible.

After the floodwaters have receded:

- Immediately contact the Main Office. A Lead Employee shall arrange to dispatch a sanitarian to evaluate the situation, provide corrective activities, monitor the corrective process and be the liaison with the regulatory authority involved.
- Make an inventory of damaged product and damage to the facility for insurance purposes.
- In the event there was computer, server, network, or other related IT hardware or equipment damage, first contact Giff Nowland (302) 218-8201 for further detailed instructions.

11. Chemical Leak

The following procedures will be carried out in the event of a hazardous substance spill:

All employees will be instructed to:

- Notify the lead employee immediately
- All employees, not trained to deal with the exposure, will be instructed to leave the immediate area.

The lead and/or designated employee(s) will:

- Determine the nature and source of the spill/release. MSDS will be used to determine the characteristics of the material and identify necessary precautions for dealing with the material
- Depending on the classification and amount of the spill, if warranted, the local fire department and appropriate local environmental agency will be notified.
- Clean-up procedures will be performed by qualified personnel

12. Natural Gas or Propane Leak

Call the gas company having jurisdiction immediately. Follow any instructions they provide.

Turn off the main gas line if possible. Make sure key employees know where the main valve is. If this is not possible, turn off the nearest valve to the item or line that is leaking.

Avoid any open flames

Make sure there is no smoking in the area.

Determine the need for evacuation of customers and employees.

Make a detailed report of damages and product loss for insurance purposes

13. Poison Control

If a poisoning situation occurs an immediately contact to the poison control center must be made.

The number for the poison control center can be found on the front page of the local phone book. The national toll-free number for poison control centers: 1-800-222-1222.

Do not attempt to diagnose the seriousness of the poisoning or the symptoms related by the caller.

14. Government Inspections

Whenever anyone is purporting to be a governmental official (i.e. FDA, OSHA, USDA, Fire Inspector, etc.) always ask for identification. A true official will not hesitate to produce it.

Once the identity has been established, inquire as to the nature of the visit. If OSHA, ask for a focused inspection. If the visit is for a reason other than a routine inspection (Department of Health, Fire, etc.) immediately contact your appropriate member of management.

Make sure you accompany the official on their inspection, take notes and immediately correct any violations that can be abated. Never let an official tour the facility unescorted.

At the conclusion of the inspection, ask for the results, and make sure that any questions you have are answered. Notify the appropriate member of management of the results.

For safety and OSHA issues **Contact the Main Office (302) 731-1333 and Chuck Northam at Safety Resources (410) 742-7233.**

An OSHA inspector generally referred to as a Compliance Safety and Health Officer (CSHO), will identify themselves upon arrival. They will ask to conduct a pre-inspection conference where information is shared about the reason for the inspection, and what the CSHO needs to see and do. An inspection may be a routine one, or one generated by a specific complaint or situation.

Make sure you accompany the official on their inspection, take notes and immediately correct any violations that can be abated. Never let an official tour the facility unescorted.

During the inspection, the CSHO may:

- Ask for an employee representative to be present during the inspection
- Photograph or video tape a situation or condition.
- Interview individual(s) alone in a private setting.
- Point out specific problems that must be corrected immediately.
- Ask to see training records and other documentation pertaining to employee safety.
- Ask to see your safety programs, policies and procedures.

When the inspection concludes, there will be a post-inspection conference during which the CSHO will discuss any findings and what corrective action is needed. If violations are cited, you will not be notified about penalties until a final report is written and sent in the mail.

During the visit, answer all questions to the best of your ability, and if an answer is not readily known, find an employee who knows the answer. Full cooperation is important.

15. Bomb Threat

If a bomb threat is received, the following procedures will be carried out:

All employees will be instructed to:

- Notify the lead employee immediately

The lead employee and/or designated employee(s) will:

- Notify the Police and Fire Department
- The emergency evacuation procedure will be initiated, unless the threat includes instructions not to do so (proper law/emergency enforcement agencies should determine proper course of action in this situation)
- The individual who received the threat should be instructed to document every word of the conversation immediately, if applicable.
- A search of the building will be performed by the appropriate law enforcement personnel only.

- Access to the building/job site will not be permitted until clearance is given by the appropriate personnel (i.e. police, fire department)

16. Terrorism

Local EMS, OEM and other agencies will begin to coordinate specific activities and prepare to execute their contingency procedures. In this event a review of all contingency plans and procedures should be completed to assure the safety and well-being of employees and customers.

In the event of a potential or actual terrorism event the following actions should be taken:

- Review all aspects of your emergency response plan, particularly the employee contact information lists for accuracy.
- Review your emergency evacuation plan and assembly areas with all employees.
- Test systems such as alarms, sprinklers, emergency generators.
- Back up any crucial facility data and continue to do so regularly for the duration of the alert.
- Contact local OEM and police departments for any specific instructions.
- Pay additional attention to suspicious packages, mail, and unattended items.
- Be aware of any unusual odors and/or dead insects or small animals in the vicinity.
- Be aware of any powders and/or liquids in or near the HVAC system intakes.
- Review your Bomb Threat procedure.
- Assure that emergency services contact information is available (utility companies, communications companies, etc.)
- Prepare to shelter in place. This will require a strong degree of leadership from the management staff.
- Prepare for civil disorder and panic situations in and around the facility.

Exhibit "A" – Evacuation Plan (Office)

During an Emergency, **EVERYONE** is to evacuate the buildings from the nearest safe and available **EXIT** and meet at the Rally Point which is the oak tree located nearest to the entrance to the property in the employee parking lot.

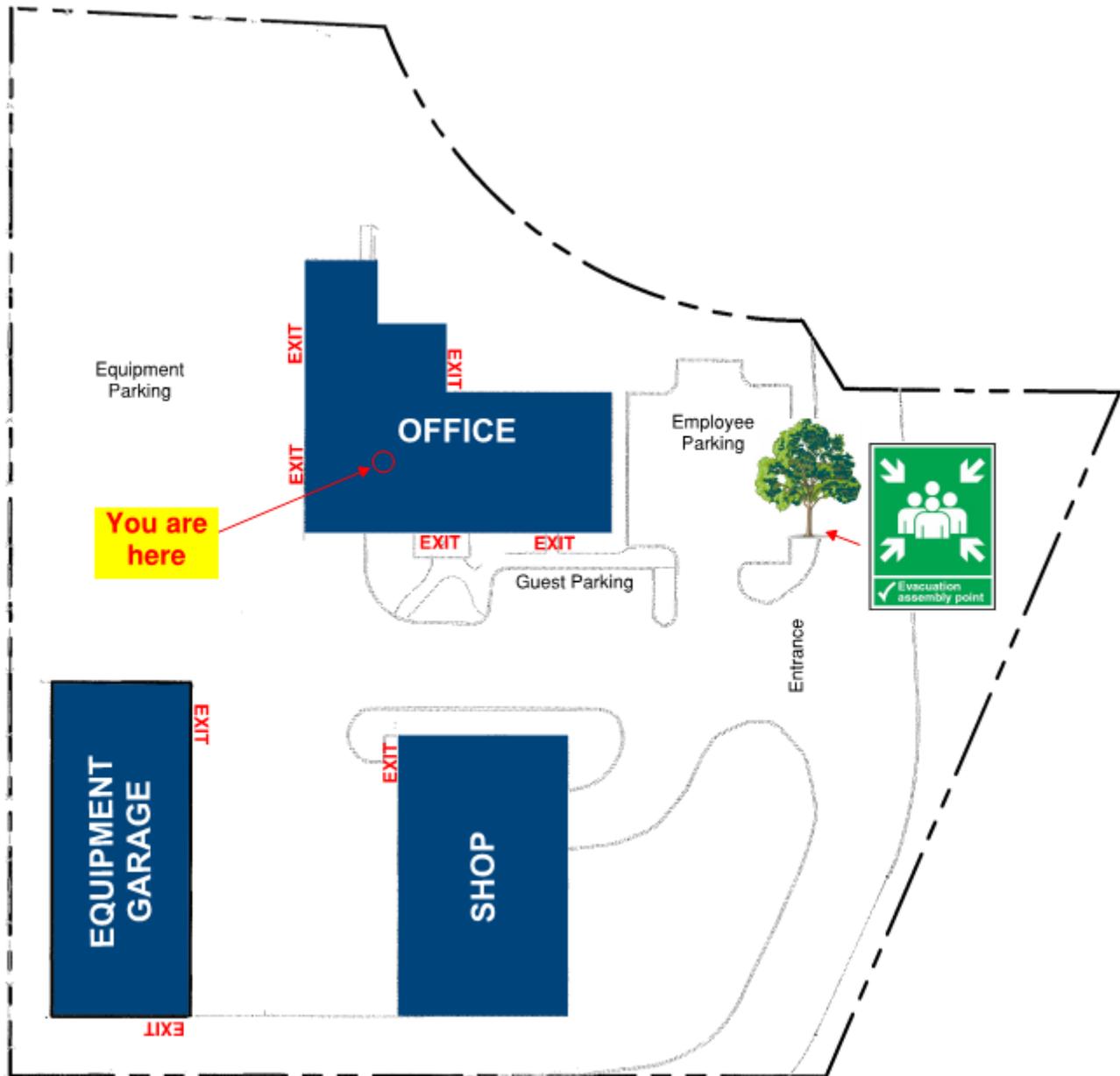


Exhibit "B" – Evacuation Plan (Equipment Garage)

During an Emergency, **EVERYONE** is to evacuate the buildings from the nearest safe and available **EXIT** and meet at the Rally Point which is the oak tree located nearest to the entrance to the property in the employee parking lot.

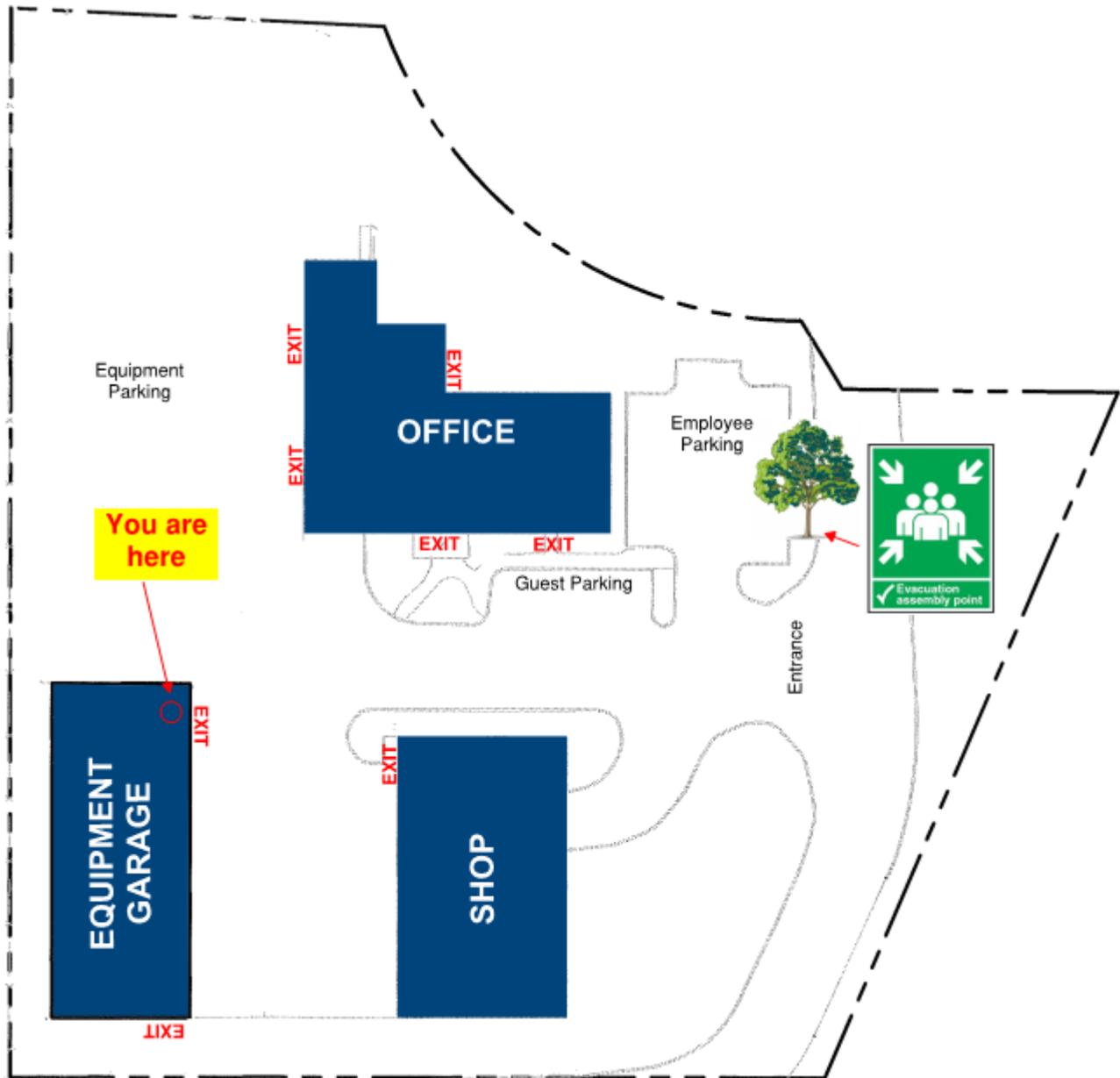


Exhibit “C” – Evacuation Plan (Shop)

During an Emergency, **EVERYONE** is to evacuate the buildings from the nearest safe and available **EXIT** and meet at the Rally Point which is the oak tree located nearest to the entrance to the property in the employee parking lot.

