

APPENDIX P: DRAFT EMERGENCY RESPONSE PLAN (REVISED)

Draft Emergency Response Plan for the Horse Heaven Wind Farm

Benton County, Washington

Prepared by
Horse Heaven Wind Farm, LLC

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- Attachment A. Site Location Map
- Attachment B. Emergency Contact Information

1 INTRODUCTION: PURPOSE, NEED, AND GENERAL INFORMATION

This Draft Emergency Response Plan (ERP) conveys emergency response procedures for potential emergencies that could occur at the Horse Heaven Wind Farm (Project). In addition, this ERP evaluates potential emergencies, outlines responsibilities for Project employees, contractors, vendors, and emergency service providers, and details response protocols. This ERP intends to meet requirements of an Emergency Action Plan in 29 Code of Federal Regulations (CFR) 1926.24 and a Fire Prevention Plan in 29 CFR 1926.24. Before Project construction, a final ERP will be developed in accordance with these requirements. The final plan will contain the contact information for key on-site safety personnel, egress routes to be taken in an emergency, as well as the location of specific safety equipment to be used in the case of an emergency.

Horse Heaven Wind Farm, LLC (Horse Heaven)¹ will coordinate with emergency response service providers to maintain adequate resources and communication throughout the Project's lifecycle. This draft ERP has been developed based on preliminary information and will be modified and updated prior to construction to account for changes in the Project's final construction, operations, and decommissioning plans.

1.1 Facility Description

The Project is a renewable energy generation facility that would have a nameplate energy generating capacity of up to 1,150 megawatts for a combination of wind and solar facilities as well as battery energy storage systems (BESS). The Project is located approximately 4 miles south/southwest of the city of Kennewick and the larger Tri-Cities urban area, along the Columbia River. A Site Location Map shows the overall site layout and site location (see Attachment A).

1.2 Emergency Contact Information and Response Jurisdictions

Emergency contact information for the site is provided in Attachment B; this list will be updated as construction contractors are selected for the Project and the final Project team is more fully identified (to be provided in the final ERP).

In the event of an emergency, 911 services would also be used to reach the emergency services answering center which is located in Richland, Washington. The Project is also located within the jurisdictional boundaries of Benton County Fire Department.

1.3 Emergency Services Authority

The Project's Project Site Manager will be responsible for overseeing emergency services compliance. Duties of the Project Site Manager include ensuring compliance with this plan, that government agencies and appropriate stakeholders (including but not limited to emergency response units, transmission utility, and project owner) are properly notified in the event notification is required, and that all required plans and reports are prepared and submitted in a timely manner. Contact information for the Project Site Manager is included in Attachment B.

¹ The Applicant is Horse Heaven Wind Farm, LLC and Scout Clean Energy LLC is the indirect owner of 100% of Horse Heaven Wind Farm, LLC.

1.4 Communication and Training Procedures

All employees and subcontractors will receive safety training before they begin work at the Project. This training will include pertinent information regarding hazardous material management and fire prevention. The Project Site Manager will be responsible for ensuring that all personnel receive this training.

2 EMERGENCY MANAGEMENT

2.1 Emergency Notification Procedure

The following describes the procedures that would be followed by Project personal in the case of an emergency.

2.1.1 *Call 911 Immediately*

In case of an emergency, staff will call 911 immediately. Staff will provide 911 operators with a clear description of the nature of the emergency, provide the location of the emergency, and describe any injuries, illnesses, or pertinent hazards/conditions at the Project.

2.1.2 *Notify a Supervisor*

Staff will contact the Project Site Manager, and then their own direct supervisor to report emergencies (after calling 911 if appropriate). For non-urgent medical attention (e.g., emergencies where 911 or ambulances are not required), the supervisor should arrange for site transport to take the injured to the hospital, and notify the hospital that they are on their way.

2.1.3 *Coordinate Emergency Services*

Supervisors will direct one or more employees to the Project entrance or anticipated ingress routes of emergency personnel (e.g., police, fire, ambulances) to meet and escort the emergency personal to the location of the emergency. If air evacuation services (e.g., helicopters) are required, personnel will direct the emergency responders to a designated helicopter landing area. This area will be identified prior to construction, and a map and coordinates will be included in the final ERP. A supervisor will accompany injured personnel to the hospital.

2.2 Site Evacuation Procedure

A designated evacuation route and meeting site will be identified in the final ERP and posted within the operation and maintenance (O&M) facility as well as other locations in plain view. When instructed, staff will evacuate the site via the nearest access point to the designated evacuation route, and assemble at the designated muster area. An Evacuation Map will be developed by the Project and provided within 30 days of Operation Date.

The Project Site Manager (or designated person) will arrange a count of all evacuated staff. Supervisors from each contractor will be responsible for maintaining an accurate record of which personnel are on site each day, in order to identify which personnel are missing in the case of an emergency evacuation. Each supervisor will notify the Project Site Manager of missing or injured employees. The Project Site Manager will also consult the employee roster as well as visitor log to check for missing employees or visitors.

2.3 Medical Emergency, Injury, and Illness Procedure

Upon finding an emergency, staff will survey the scene to check for hazards and make sure the area is safe to enter. They will then call 911 immediately and request an ambulance as well as report the incident to the Project Site Manager and direct supervisor (as discussed above). Staff will initiate notification procedures and request help from employees trained in first aid/cardiopulmonary resuscitation (CPR). Staff will not move the person experiencing a medical emergency unless it is unsafe to remain in the location. Staff will assess the nature of the medical emergency, injury or illness and provide information to emergency services. If the injured/ill person is responsive, request permission to administer first aid. If the person is not responsive, check the person's breathing and circulation. People trained in first aid and CPR should administer first aid and CPR as necessary.

2.4 Shelter-In-Place Procedure

The Project Site Manager will direct employees to shelter-in-place during certain types of emergencies and instruct employees to shelter in place in the O&M building or other shelter when appropriate. When necessary, the Project Site Manager will shut down ventilation systems in the O&M building or other shelter to isolate the shelter from potentially dangerous chemicals if needed (e.g., in the case of an airborne contamination or release of dangerous chemicals).

2.5 Natural Disaster and Severe Weather

In the event of a natural disaster or severe weather, the Project Site Manager will monitor weather sources for updated emergency instructions and broadcast warnings if issued by weather services via radio or loudspeaker. The Project Site Manager or designated person will direct personnel to enter the O&M building or other appropriate shelters, and to shelter-in-place (as described above).

2.6 Airborne Contamination/Dangerous Chemical Release Procedure

The Project Site Manager will direct staff to shelter in place during certain airborne contamination and chemical release emergencies (as described above). When necessary, the Project Site Manager will shut down ventilation systems in the O&M building or other shelter.

2.7 Acts of Sabotage or Terrorism Procedure

The Project Site Manager will employ the emergency notification procedure noted above. If necessary, the Project Site Manager will employ the shelter-in-place procedure, or airborne contamination procedure as well, and coordinate with emergency services as needed.

2.8 Bomb Threat Procedure

The Project Site Manager or person who receives the threat will employ the emergency notification procedure and evacuation procedure. If the threat is received by phone, the recipient will attempt to keep the caller on the line for as long as possible and garner information about the bomb threat.

2.9 Spill Procedure

In a case of an inadvertent spill of chemicals, the Project Site Manager will implement the measures outlined in a separate Spill Prevention, Control, and Countermeasures Plan.

3 FIRE PREVENTION

3.1 Purpose and Need for Fire Prevention Plan

The purpose of the Fire Prevention Plan is to:

- Protect employee health and safety by reducing fire-related risk, injury, and damage.
- Identify fire risk factors and hazards
- Outline a procedure to follow for in the event of a fire.
- Identify fire prevention and suppression systems, and equipment on site.
- Identify personnel responsible for maintaining and servicing the systems and equipment.

3.2 Training Responsibilities and Procedures

All employees will be trained to prevent and respond to a fire emergency. All employees must:

- Complete an on-site training program identifying the fire risks.
- Know and follow designated emergency procedures.
- Report potential fire hazards to the Project Site Manager.

3.2.1 *Understanding Hazards Associated with Photovoltaic Solar Arrays*

Photovoltaic (PV) solar arrays present a unique hazard for fire fighters and Project staff. PV arrays do not have a single point of disconnect, but several disconnects that will de-energize parts of the system. When PV array panels are illuminated, the PV panels are energized. Illumination by light sources, including artificial light sources such as fire department lights or the light for the fire itself, can produce electrical power sufficient to cause a shock hazard. Below is a summary of the hazards associated with firefighting activities in photovoltaic solar arrays:

- Shock hazard due to the presence of water and PV power during fire suppression activities, and
- Shock hazard due to direct contact with energized components.

Due to the dangers presented above, fire on PV arrays should not be extinguished by employees. Emergency personnel should be made aware of electric shock hazards and not use water inundation to extinguish the fire.

3.2.2 *Understanding Hazards Associated with Wind Turbines*

First responders (e.g., fire departments) will be informed of the need for specialist recovery equipment and techniques when responding to emergencies at the Project. The Project Site Manager will coordinate with the Benton County Fire Marshal regarding this need. In the event that a fire occurs within a wind turbine generator (Turbine), the Project Site Manager (or responding staff) will implement the following procedures:

- Initiate emergency notification procedures and evacuate the area.
- Verify the affected Turbine is isolated from the electrical system.
- Determine fire location (base or nacelle) and investigate with binoculars 100 feet from the Turbine.
- For base fires: Advise emergency responders of hazards and give them control of the scene.

- For nacelle fires: Evacuate a zone (approximately 100 feet) around the base of the Turbine.
- Keep all personnel away from the Turbine (including emergency responders)
- Allow fire debris to fall freely within controlled area and watch for fire debris to go beyond the controlled area.
- Allow the fire department to manage the fire scene. Direct site personnel to stand by to assist with isolation of additional turbines and electrical equipment, if requested by the Fire Department Incident Commander.

3.2.3 Understanding Hazards Associated with Battery Energy Storage Facilities

Although fires within industrial-scale lithium-ion battery energy storage systems are rare and expected to become even more rare with the updated NFPA 855 and IFC 2021, when fires do occur, these systems present several unique hazards for first responders. Battery cells do not have a single point of disconnect that can be used to de-energize the system. Instead, there will always be stranded energy in the battery cells. The amount of energy is dependent on the state of charge of the batteries at any given time. Additionally, lithium-ion batteries have the potential to enter thermal runaway, which generates heat and flammable gases. If a thermal runaway or fire event begins inside a battery container, the fire detection system will notify site operational personnel and first responders. First responders should not attempt to extinguish the fire or arrest the thermal runaway. The battery containers will be designed to contain the event until it fully consumes itself. Attempting to extinguish the event creates a risk of a deflagration event, which substantially increases the risk to first responders. Applying water to the event also creates the scenario where the event will smolder for days or weeks without being fully extinguished. When the event is allowed to fully consume itself, the duration of the event is only a few hours. Additional training will be provided to the first responders prior to the battery system being placed into commercial operation.

3.2.3.2.4 Small Stage Fires

Small stage fires ~~are~~ can be controlled with a fire extinguisher. In the event of a small stage fire at the Project, the Project Site Manager (or responding staff) will implement the following procedures:

- Immediately sound the alarm and begin the notification procedure.
- Remove all non-essential personnel from the hazard area.
- If it is safe to do so, use a fire extinguisher to extinguish the fire. Do not put yourself in danger.
- The Project Site Manager will determine if emergency services or an evacuation is necessary. In the event of a fire evacuation, the Project Site Manager or designated person will initiate the evacuation procedure and issue the following statement over the radio: “*Attention, there is a fire emergency at (location name). Please evacuate (the affected area) and report to (designated muster area)*”.
- All employees in the affected area will stop work immediately, take steps to safely shut down equipment, evacuate, and report to the designated muster area.
- The Project Site Manager will ensure that no staff re-enters the evacuated area until the fire department arrives to extinguish the fire and the scene is determined to be safe by the fire department.

3.2.43.2.5 Large Stage Fires

A large stage fire may not be controlled by a fire extinguisher. In the event of a large stage fire at the Project, the Project Site Manager (or responding staff) will implement the following procedures:

- The person discovering the fire should immediately sound the alarm and initiate the emergency notification procedure. If the fire cannot be readily extinguished, they will evacuate the area.
- Remove all personnel from the immediate danger area in anticipation of an evacuation.
- The Project Site Manager will ensure that the fire department has been dispatched and determine the Project evacuation needs. The Project Site Manager will assign staff to assist with the evacuation and initiate the evacuation procedure. The Project Site Manager will issue the following statement over the radio: “*Attention, there is a fire emergency at (location name). Please evacuate (the affected area) and report to (designated muster area).*”
- At this point, all staff in the affected area will stop work immediately, take steps to safely shut down equipment, exit the evacuation area, and report to the designated muster area.
- In this scenario, fire extinguishers are to be used for escape purposes only.
- The Project Site Manager and applicable supervisors will take the necessary steps to ensure that no employee re-enters the evacuated area until the fire department arrives and assumes command.
- No staff are required or permitted to place themselves in harm’s way in order to facilitate extinguishment, evacuation, or rescue. All rescue operations will be performed by trained professionals upon their arrival.
- The Project Site Manager will issue an “*all clear*” only when the fire department informs them that it is safe to do so.

3.3 Vegetation Fire Risk and Procedures

Vegetation at the Project will be controlled and maintained to reduce fire risk in compliance with the Revegetation and Noxious Weed Control Plan. In the event that a vegetation fire does occur, the Project Site Manager (or responding staff) will implement the following procedures:

- **Do not** attempt to extinguish the flames with water or other chemicals, as this would present an electric shock hazard.
- Initiate emergency notification procedure and evacuate if necessary.
- If safe to do so, attempt to shut down power using the Project electrical disconnect.

3.4 Fire Department Access

3.4.1 Site Access

Horse Heaven staff will coordinate site access with the Benton County fire department and other fires responders (e.g., police) to ensure adequate access to the Project for emergency vehicles.

3.4.2 Internal Facility Access Roads

The internal site access roads will consist of 16 foot-wide all-weather gravel surfaced roads. These access roads will be located as to provide access to Project components including the Project substations and BESS, where the solar inverters and step-up transformers will be located. All Project access roads will be accessible to emergency services vehicles.

3.4.3 Access Aisles

Access to all areas within the solar arrays is provided by access aisles as well as access roads (access roads discussed above). Access aisles are the vacant spaces between the individual rows of solar panels. Although these clear spaces are not suitable for all emergency services vehicles, these access aisles do provide emergency services personnel with access routes to all areas of the site via walking from a nearby access road or by the use of 4x4 vehicles.

3.5 Controlling Hazards and Prevention Practices

For a Fire Prevention Plan to be effective, staff need to be educated on fire hazards associated with a solar and wind energy generation facility and know how to prevent and control fire hazards. As discussed above, this document identifies the steps that must be taken when identifying a fire risk, as well as training requirements that all staff must undergo.

3.6 Welding/Hot Work

Welding, grinding, cutting, and open flame work (i.e., hot work) presents fire hazards. Welding processes may use oxy-acetylene gas, electrical current, and heat from fuel gas. The following measures will be implemented to minimize the risk of fires from hot work.

- Cutting and welding will be done by authorized personnel only.
- Torches, regulators, pressure-reducing valves, and manifolds will be inspected regularly.
- Welders will wear eye protection and protective clothing.
- Establish a fire watch when required.

3.7 Class A Combustibles

Class A Combustibles consist of common materials (e.g., wood, paper, cloth, rubber, and plastic) that can act as fuel and are found on most work sites. To reduce fire risk from Class A Combustibles, the following requirements will be implemented and followed by all Project staff:

- Dispose of waste daily and use trash receptacles with covers.
- Keep work areas clean and free of combustible materials.
- Store materials in the proper storage containers.

3.8 Class B Combustibles

Class B Combustibles include flammable and combustible liquids (e.g., oil, grease, tar, oil-based paints, and lacquers) flammable gases, and flammable aerosols. To reduce fire risk from Class B Combustibles, the following requirements will be implemented and followed by all Project staff:

- Do not dispense Class B flammable liquids into a container unless the nozzle and container are electrically interconnected by contact or bonding wire. The tank or container must be grounded.
- Handle, use, and store Class B combustibles only in approved locations where vapors are protected from ignition sources such as heat sources, electric equipment, open flames, or electric sparks.
- Do not use, handle, or store Class B combustibles near exits or stairs.

- Do not do hot work or use electrical equipment that may spark near Class B combustibles.
- Do not generate heat, allow an open flame, or smoke near Class B combustibles.
- Know the location of and how to use the nearest portable Class B fire extinguisher.
- Do not use water to extinguish Class B fires caused by flammable liquids, as it can cause the burning liquid to spread, making the fire worse. To extinguish a fire caused by flammable liquids, exclude the air around the burning liquid. The following fire extinguishing agents are approved for Class B combustibles: carbon dioxide, multi-purpose dry chemical (ABC).

3.9 Class C Fires

Class C fires are fires that involve energized electrical equipment. In the event of a Class C fire, the following requirements will be implemented and followed by all Project staff:

- Always de-energize the circuit supplying the fire, and then use a non-conductive extinguishing agent such as carbon dioxide or Halon. A multi-purpose dry chemical (ABC) extinguisher can also be used on Class C fires.
- Do not use water, foam, or other electrically conductive agents when fighting electrical fires.

3.10 Electrical Fire Hazards

Electrical equipment is a major cause of workplace fires. To reduce the risk of electrical fires, the following requirements will be implemented and followed by all Project staff:

- Check all electrical equipment to ensure it is properly grounded and insulated.
- Ensure adequate spacing while performing maintenance.
- Check wiring to ensure no damage to cables or connections.

3.11 Staff Training and Education

Project staff will be trained in fire safety plan practices relevant to their duties. The Project Site Manager will confirm all employees understand the function and elements of the fire safety plan, including types of potential emergencies, reporting procedures, evacuation plans, and shutdown procedures.

Fire safety training will occur during the site safety training. Every staff member will be required to take this training before being allowed to work at the Project. Training will include:

- Employee roles and responsibilities;
- Recognition of potential fire hazards;
- Alarm system and evacuation routes;
- Location and operation of manually operated equipment (e.g., fire extinguishers);
- Emergency response procedures;
- Emergency shutdown procedures;
- Information regarding specific materials to which employees may be exposed;
- Review Occupation Safety and Health Administration (OSHA) requirements contained in 29 CFR 19010.38, Emergency Action Plans;
- Review OSHA requirements contained in 29 CFR 1910.39, Fire Prevention Plans;

- The location of the Fire Prevention Plan and how it can be accessed; and
- Good fire-prevention housekeeping practices and equipment maintenance.

3.12 Use of Portable Fire Extinguishers

The following will be implemented when located storing fire extinguishers:

- A minimum of one portable fire extinguisher will be provided within 200 feet of indoor work areas during construction or heavy maintenance.
- Fire extinguishers will be inspected monthly.
- Fire extinguishers will not be obstructed and should be located in conspicuous locations.

3.13 Site Maintenance & Housekeeping

The following will be implemented with regard to site maintenance and general housekeeping:

- Combustible material will not be stored in mechanical rooms, electrical equipment rooms, or the supervisory control and data acquisition buildings.
- Outside dumpsters will be kept at least 5 feet away from combustible materials and the lid will be kept closed when not in use.
- Storage is not allowed in electrical equipment rooms or near electrical panels.
- Electrical panel openings must be kept covered.
- Power strips must be plugged directly into an outlet and not daisy-chained, and should be for temporary use only.
- Extension cords and flexible cords will not be substituted for permanent connections.

3.14 Equipment Fire Safety

The following will be implemented with regard to equipment safety:

- All internal combustion engines, both stationary and mobile, will be equipped with spark arresters. Spark arresters will be kept in good working order.
- Light trucks and cars with factory-installed (type) mufflers will be used only on roads where the roadway is cleared of vegetation. These vehicle types will maintain their factory-installed (type) mufflers in good condition.
- Equipment parking areas and small stationary engine sites will be cleared of all extraneous flammable materials.
- The use of chainsaws, chippers, vegetation masticators, grinders, drill rigs, tractors, torches, and explosives will be restricted to periods outside of the official fire season to the extent practical. When the above tools are used, water tanks equipped with hoses, fire rakes, and axes will be easily accessible to personnel.

3.15 Emergency Response

The Project Site Manager will meet with local emergency response groups to review the Fire Prevention Plan, discuss the type of work taking place, duration of Project schedule and emergency procedures. The following actions will be implemented to maintain an effective response in the case of an emergency:

- Evacuation procedures and assembly will be contained in the Evacuation Plan, which will be posted in all office trailers.
- Staff will notify proper emergency services for assistance in the case of an emergency (e.g., dial 911 or direct-dial emergency contact numbers if possible). Emergency numbers shall be posted at each office trailer.
- Staff will notify Project Site Manager and all affected personnel at the site through use of site radio or other communication devices.
- Once emergency personnel have been notified, a staff member will then be designated to meet the emergency personnel at the ingress route and then guide them to incident location.
- Only after the emergency is declared over by the first responders can all other radio communication resume.
- The Project Site Manager will prepare a summary of the incident as soon as possible and no later than 24 hours after the incident.

4 HAZARDOUS MATERIALS

4.1 Container Management

The following lists the requirements related to container management:

- All hazardous substance containers must be in good condition and compatible with the materials stored within.
- All hazardous substance containers must be accessible and spacing between containers must provide sufficient access to perform periodic inspections and respond to releases.
- Empty hazardous substance containers must have all markers and labels removed and the container marked with the word “empty.”
- Any spills must be cleaned immediately.
- Flammable materials stored or dispensed from drums or totes must be grounded to prevent static sparks.
- Do not overfill drums. Leave space to allow for expansion.

4.2 Good Housekeeping

The following lists the requirements related to general housekeeping:

- Store hazardous substances inside buildings or under cover, in cabinets, or in designated areas.
- Hazardous substance containers should remain closed while not in use;
- Use drip pans or other collection devices to contain drips or leaks from dispensing containers or equipment. Use funnels to transfer materials between containers.
- Implement preventative maintenance activities to reduce the potential for an inadvertent release of chemicals.
- Use authorized signs to identify hazardous substance storage or waste collection areas.
- Keep all work areas and hazardous substance storage areas clean.

- Update spill prevention and control plans and stock appropriate clean-up materials whenever changes occur in the types of chemicals used or stored onsite.

4.3 Secondary Containment

The following lists the requirements related to secondary containment:

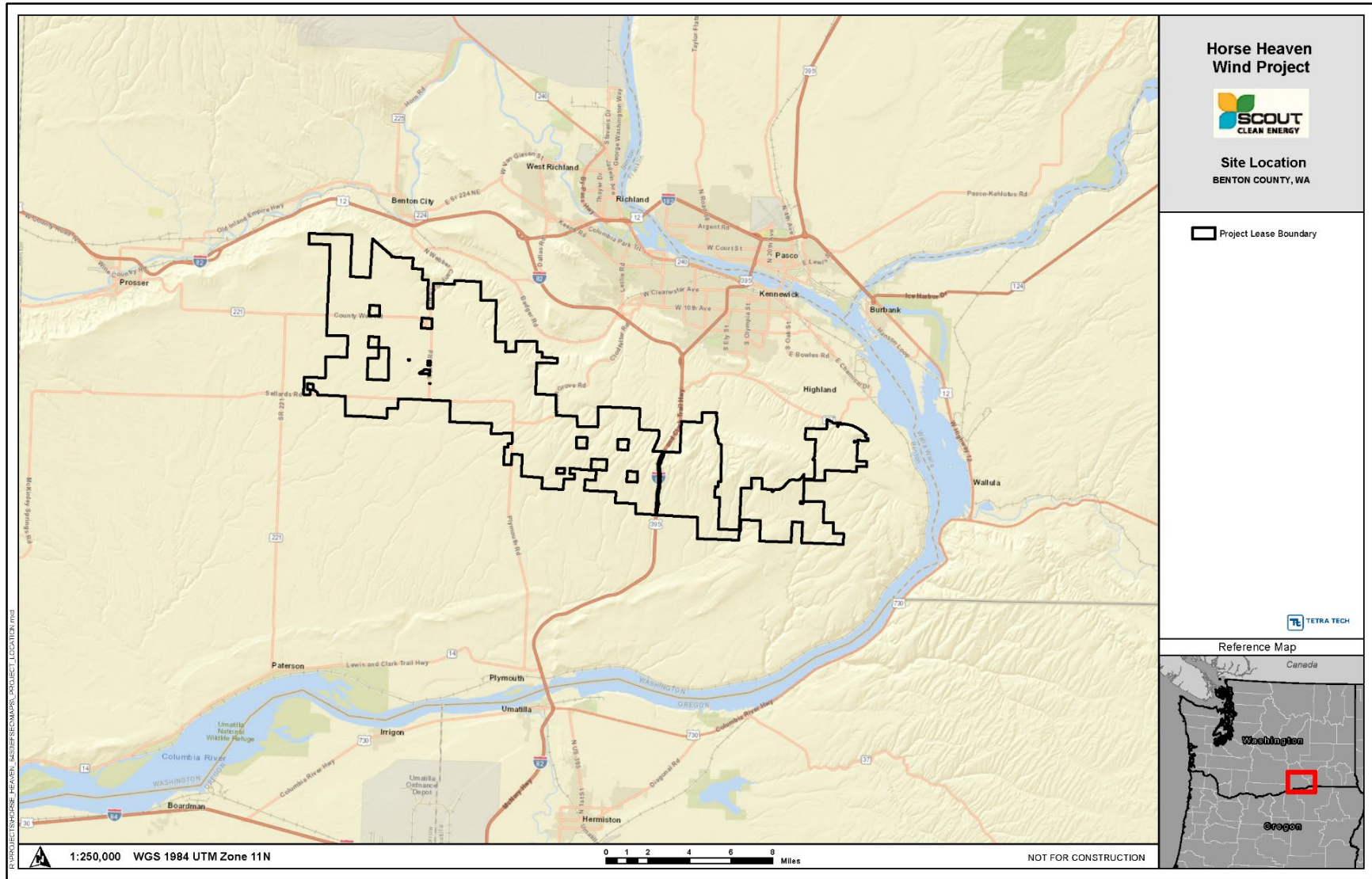
- Store all bulk chemicals (more than 55 gallons) within appropriate secondary containment, or any sized chemical if there is a potential for release to the environment.
- Secondary containment should be checked periodically, and any spills identified in secondary containment must be immediately cleaned up and removed.

4.4 Marking/Labeling

The following lists the requirements related to proper labelling of hazardous materials:

- Ensure all hazardous substances, including chemical wastes, are properly marked and labeled in accordance with all federal, state and local regulations.
- Ensure that hazardous substances transferred to small containers are marked with the chemicals name (example- “Isopropyl Alcohol”) and hazard (example- “Flammable”).

ATTACHMENT A SITE LOCATION MAP



ATTACHMENT B EMERGENCY CONTACT INFORMATION

The contact information for the Project Operations Center will be provided to NORAD and other applicable agencies within 30 days of Operation Date. This plan will be updated with that contact information at that time. Below is the primary contact information for Horse Heaven Wind Farm, LLC:

- Horse Heaven Wind Farm, LLC,
5775 Flatiron Parkway, Suite 120
Boulder CO 80301
ROC@scoutcleanenergy.com
720.750.8094