UCHIYAMA MANUFACTURING AMERICA LLC

EMERGENCY ACTION PLAN

Emergency Action Plan (29 CFR 1910.38)

OVERVIEW

1) 1910.38 (a) Scope and Application:

a) This paragraph (a) applies to all emergency action plans required by a particular OSHA standard. The emergency action plan shall be in writing (except as provided in the last sentence of paragraph (a)(5)(iii) of this section) and shall cover those designated actions employers and must take to ensure employee safety from fire and other emergencies.

Elements:

- (i) Emergency Escape Route Assignment.
- (ii) Procedures to be followed by employees who remain to operate critical plant operations before they evacuate.
- (iii) Procedures to account for all employees after emergency evacuations have been completed.
- (iv) Rescue and medical duties for those employees who are to perform them.
- (v) Preferred means of reporting fires and other emergencies.
- (vi) Names or regular job titles of persons or departments who can be contacted for further information or explanation of duties under the plan.

Alarm System:

The employer shall establish an employee alarm system that complies with paragraph 1910.165.

Training:

Before implementing the emergency plan, the employer shall designate and train a sufficient number of persons to assist in the safe and orderly evacuation of employees.

Impairment to Protective System

2) A protection impairment occurs when fire or explosion protective systems (such as sprinklers, water spray, fire alarms, etc.) are shut off or otherwise taken out of

When there is a protection impairment, the PESM should be notifed immediately. Monitoring of the system is provided by Schneider Electric Bulidings Americas, Inc. The PESM or designee shall immediately report any conditions that may provide a false signal to the monitors. A scheduled down period must be coordinated with the monitors prior to any repairs or systems taken off-line.

The Department Supervisor/ Emergency Response Team and Shift Leaders will take precautions to provide temporary protection to reduce hazards and to ensure that prompt service is restored.

Tobacco/Vaping/Smoking Regulations

- 3) Management will survey on a regular basis those areas to be designated smoking areas and those areas where smoking will be prohibited.
 - a) All work areas are designates as tobacco/vape and smoke free areas.
 - b) Tobacco use, vaping, and smoking is permitted only at the assigned smoking area outside of the plant at employee entrance/picnic
 - c) Tobacco use/vaping/smoking is prohibited in all other areas of the premises.
 - d) Inform employees and visitors of these regulations and adherence to the policy.
 - e) Outside contractors are required to adhere to the tobacco/vaping/smoking policy.

Employee Training

The PESM and/or the training coordinator is responsible for the overall training efforts of the company.

All new employees will be instructed by department leaders / supervisors in all aspects of the Emergency Action Plan

Specific job training and local and area housekeeping responsibilities are to be handled by the department supervisory personnel on each shift.

At no time will employees be permitted to work in an unsafe manner.

Job safety and cleanliness is discussed with all new employees during orientation.

Training by contracting with outside sources may be necessary from time to time. It will be the responsibility of the PESM to arrange the training and to ensure that the training meets all relevant laws and regulations.

New Construction/Installations

4) In order to have reasonable loss prevention and control during any construction or installation of equipment, the following procedures will apply:

- a) Employees of outside contractors are to follow the same loss prevention rules that apply to the facility employees. These rules include but are not limited to: Hot Work Permits, Tobacco/Vaping/Smoking Regulations, Hazardous Chemical Program, Equipment Safety, etc.
- b) A Contractor Orientation Checklist and Certification must be completed prior to the start of any construction or modification to equipment or building. This document will be the responsibility of the PESM and will be maintained in the appropriate file for review.
- c) Installation of protection systems will be scheduled to keep pace with the progress of any new construction/ installation.

Pre-Emergency Planning

5) The purpose of the pre-emergency plan will be to provide a useful framework to handle a wide variety of emergencies that may threaten employee safety, property and continued operations.

A. Fire:

Upon discovery of fire

If inside building: Implement evacuation procedures by activating the fire alarm system Pulling the alarm will activate the fire alarm. These are located at each emergency

If outside building: Notify appropriate management.

Upper Management or PESM will direct ALL apppropriate calls.

Emergency response team are trained to fight incipient fires using hand held fire extuingishers. If fire cannot be contained, the Manager/Supervisor in charge will make an evaluation regarding evacuation.

All employees are to assemble by the fence according to their assigned areas and Managers/Supervisors should account for their employees and report status to the Incident Command Post.

If any employee is found to be missing, The President/CEO, Incident Coordinator/alternate shall promptly notify the Fire Chief or designee of the situation. It will be the responsibility of the responding fire department to take appropriate action to rescue any missing employee. At no time should any UMA employee reenter the building without approval of management and/or fire department incident

B. Emergency Phone Numbers: 911

If outside assistance is needed when the party answers, please say, "We have a (medical, fire, etc.) emergency at Uchiyama Mfg. America. We are located at "494 Arrington Bridge Road." Please tell the emergency operator as much information about the emergency as you can.

C. Civil Disorder

In the event of a civil disorder, whether in the vicinity of the plant, or in another section of town, management shall take the necessary steps for protection of personnel and property. Information necessary to take appropriate action on disturbances in other areas of town will be received by telephone, radio, or messenger by a system initiated by law enforcement authorities. Gates should be kept closed and monitored until the disturbance has been defused.

D. Natural Disaster

When the threat of severe weather is present, it is the responsibility of management to take appropriate action to secure the safety and welfare of every employee.

Plant personnel will be notified of impending emergency through the monitoring of local radio broadcast and/or appropriate weather web sites.

Upon notification of severe weather in the immediate area of the plant the following procedures should be adhered to:

Management officials should take appropriate action to notify employees to proceed to the designated shelter areas by sounding the alarm 1 long blast for the ERT Members to assemble at the staging area for instructions. At that time the ERT members will be instructed to notify employees that if they hear 2 blasts from the alarm system button, they are to go to their nearest severe weather shelter area. Additionally, as time permits, management may make an announcement over the PA of further instructions.

Designated shelter areas: Men/Ladies Bathroom front and rear of plant main level and the rubber cooling room close to the interior walls. Second floor must be

E. Bomb Threat

The receptionist and others likely to receive such telephone calls are to be trained to listen attentively. Keep caller talking as long as possible, ask questions as to where the bomb is located, when it is set to explode, why it was put there and other pertinent information. Make complete notes and make an accurate note of the number. Provide the operator with accurate information as to the time, date and the incoming line that the call was received. The person receiving the call is to promptly notify management officials.

The management representative in charge will immediately call the police department to inform them of the threat and request assistance.

Should the decision to evacutate the building be made, the fire alarm should be activated; management will give verbal instructions to do so. Evacuation will be accomplished as outlined in the Plant Evacuation Plan (found in the following pages).

A search for a bomb is to be made by the police or sheriff's department, or by specialists called by them, according to procedures in which they have been trained, assisted by company personnel as requested by them.

Areas are to be kept as neat and as orderly as possible and free of debris or material that could be used to conceal a bomb.

F. Power Failure

All power failures shall be investigated as to the cause; whether Duke Energy or internal. The President/CEO, Upper Management, or PESM shall give instructions concerning evacuation and what to do next, based on the circumstances at that time. The single highest priority is for the safety of our employees. Associates shall follow normal evacuation protocol outlined within this document.

Duke Progress Energy Priority

Priority in restoration is given to hospitals, police departments and other critical emergency services essential to health and safety of residents. Duke Energy Progress begins restoring power by focusing first on the transmission and main distribution lines and substations. This restores power to the largest number of customers as quickly as possible. Once substations, transmission and main distribution lines are repaired, Duke Energy Progress focuses all their crews on restoring service to tap lines and service wires for individual businesses and homes.

Call Information:

When an outage occurs, a UMA employee should call the **Critical Process Customer Hotline (800-401-5401)** to report the outage. To report the outage, the information below is needed:

Call 800-401-5401

Company Name: Uchiyama Manufacturing America LLC

Account Number: 9100 8564 6803

Address: 494 Arrington Bridge Rd.

Goldsboro, NC 27530-8538

Note: If the above listed phone number is not working or busy for a long period of time, one can also try calling **800-419-6356** (English) and **866-427-2466** (Spanish) (These are also numbers for regular business outages).

If all else fails, our Duke Progress energy account representative's direct Cell Phone Number is **919-740-1588**, He can assist with any issue that we have and is a very resourceful asset in finding the root cause to power problems in the plant that relate to Duke Progress.

Power Outage not related to Duke Energy

In the event a power outage is not related to Duke Energy and maintenance has 7) eliminated immediate possibilities such as tripped breakers or switch gears, our next step is to contact our contracted third party electricians, for assistance in determining the cause of the failure. In the event the failure is determined to be a switchgear failure, busway failure, or any number of other issues that may impair power restoration for a period of longer than 24 hours, refer to the Emergency Response and Contingency Plan EN04-001 (Para 10.3). Also consider contacting, "Sunbelt Rentals Power Division Wake Forest, NC, (919-570-7050)" to obtain a large generator that will power the portion of the plant that is affected by the failure. An example is that a one meg generator will provide approximately 1600 Amps of 277/408VAC to the main switch gear in the back of the plant. Our main gear is a 2000-amp panel, though we only use about 800 Amps.(measured Jan 2017) This generator also takes approximately 650 gallons of diesel fuel to run the generator per day. We would contract our third party electrician to prep and install the generator to the switchgear in this case.

Prior to Restoration of Power

- Although UMA main switchgears and breaker panels are protected by surge protectors it is in our best interest to take additional precautions to protect our assets prior to restoration of the main power circuits to the plant. At the minimum when time permits, take the following precautions to prevent additional damage to equipment:
 - a) Turn off Boiler
 - b) Turn off Air Compressor Disconnects: 50 HP/60HP/75HP/100HP
 - c) Turn off all circulating water pumps: Peening room water circulator and Tower water shutoff, vertical incoming line, two circulating pumps near 50 and 100 HP Air Compressors
 - d) After these actions, if time permits, disconnect the power at each machine. If the power outage is scheduled, follow these steps prior to Duke Progress Energy disconnecting power.

Safety at Work during Power Recovery

9) As power returns after an outage, people at work may be at risk of electrical injuries as power lines are reenergized and equipment is reactivated. Duke Progress recommends that employers and employees be aware of those risks and take protective steps if they are in contact with or in proximity to power lines, electrical components, and the moving parts of heavy machinery.

Once power is restored, it is best to slowly start each machine so that the system does not get overloaded. As always SAFETY FIRST!!!!!!

Emergency Evacuation Responsibilities

1st Shift

Management Official Responsible: President/Plant/Asst.Plant Manager

PESM

Incident Command Post: Flag Pole (Fire/Bomb Threat)

Time Clock Area (Power Failure/No Fire)

Duties: Determine need for evacuation

Implement evacuation of plant personnel Receive status report of employees evacuated Coordinate emergency procedures with responding

emergency personnel.

Gate Assignment: Gate 1 - Emergency Response Team Member

Gate 2 - Emergency Response Team Member Gate 3 - Emergency Response Team Member

2nd Shift

Responsible Personnel: Superintendent/Floor Leader

Incident Command Post: Flag Pole (Fire/Bomb Threat)

Time Clock Area (Power Failure/No Fire)

Duties: Same as for 1st shift, until relieved by Upper

Management/PESM/ Production Manager

Gate Opening: As directed by person in-charge

3rd Shift

Responsible Personnel: Superintendent/Floor Leader

Incident Command Post: Flag Pole (Fire/Bomb Threat)

Time Clock Area (Power Failure/No Fire)

Duties: Same as for 1st shift, until relieved by Upper

Management/ Human Resource Manager

Gate Opening: As assigned by Superintendent/Floor Leader

Hazardous Materials Evaluation

Our Hazard Communication Program adequately addresses this area. Please refer to the Globally Harmonized System (Right to Understand) for details.

In case of spills refer to the SDS sheet for proper clean up, using the proper disposal method detailed in the SDS.

Cutting, Welding, and Other Hot Work

"Hot Work" includes welding, cutting, grinding, soldering and other activities that produce sparks or use flames. Whenever "Hot Work" is to be done in the building area, a Cutting-Hot Work Permit must be issued and displayed.

The PESM shall be responsible for reviewing this program with any internal or contract maintenance personnel and issuing permits when needed.

Deg No. Revision	0°09 26° HOT WC	Pug 1/1 4/15/2014
Rev sion		4/_5/2014
	PERMIT	DANGER
FOR CUTTING AND WELDING		PRECAUTIONS TO PREVENT FIRES
IMPORTANT-Follow precautions indicated		DO NOT CUT OR WELD UNTIL THE FOLLOWING PRECAUTIONS HAVE
		BEEN LAKEN
		Check each item box below:
Building:		
Permit Issu		The work area is personally examined.
Dept. / Arc	a: Floor:	Sprinkler system is in operation.
Work to be done:		There are no flammable liquids or un purged tanks in the area.
		The job will be confined to area described on permit.
		Floors are dean.
		All combustibles have been located 35 feet from the job area and/or protected. All floor and wall openings within 35 feet have been covered tightly.
		Fire watchers have been asigned to the area and know how to
Permit Expires:		give alarm
Operator's Name:		Ample extinguishing equipment for immediate use has been provided
Assigned Fire Watch Name:		All cutting and welding equipment was found to be in good repair
Signed by:	(Individual responsible for authorizing welding and cutting)	
Title:		FINAL CHECK-UP
Time Start	cd: Completed:	The work area was observed for at least 30 minutes after work was completed and found fire safe.
• Complete	this Hotwork Permit, including having the precautions	Signed:
followed, signed by someone in authority, and hang this permit in the		7111
vicinity of hotwork operation. Once the hotwork is completed and the		Title:
for review.		Date: Time:

Fire Protection Equipment Inspection

Fire extinguisher inspection will be conducted on a monthly basis by the Maintenance Department. Record of the inspection will be recorded on the tag attached to each fire extinguisher. A third party certified contractor will conduct an annual inspection of each extinguisher on the plant property.

Action to correct any deficiencies and reports will be handled and maintained by the PESM.

Hazard Identification and Evaluation

It is important that the various hazards within the operation of the plant be identified and evaluated. This allows us to determine when control or protective measures are necessary.

All management has responsibility to report any protential new hazards.

Annual visits by the Arrington Bridge Fire Department will also help to identify and recommend corrective action of potential new hazards in the plant.

UMA EMPLOYEES are not permitted to enter manholes.

Proper Housekeeping

An important part of an effective program for Loss Prevention involves the development and implementation of good housekeeping practices. Poor and/or improper housekeeping contributes to greater loss potential by increasing fire and explosion hazards.

All personnel will be responsible for proper housekeeping and maintaining acceptable levels of cleanliness. All personnel are required to follow the 6S program and monitoring of the program will be conducted by Senior Management on an un-announced and varying schedule in order to detect deficiencies and recommend corrective action.