Emergency Action

And

Contingency Plan

Nanogate North America

150 E. Longview Ave. Mansfield, Ohio 44903

501 Newman Street, Mansfield, Ohio 44902

Contents

NANOGATE NORTH AMERICA EMERGENCY PERSONNEL

NAME	POSITION	DESK #	CELL#
Paul Boggs	CEO	419-521-0134	419-295-2137
Dave Rankin	VP Director of Technology	419-521-0133	419-295-4275
Dan Hensel	Director of Production Operations	419-521-0174	419-651-3218
Ken Bodnar	Maintenance Manager	419-521-0168	567-303-8263
Scott Bobst	Environmental Health Manager	419-521-0366	419-632-4400
Rachel Wilson	Safety Coordinator	419-521-0175	567-224-8819

EMERGENCY PHONE NUMBERS

Police Department	911 or 419-755-9724
Fire Department	911 or 419-755-9814
OhioHealth Emergency Room	419-526-8000
AVITA/Work well	419-709-8667
Ohio Poison Control Center	1-800-222-1222
Richland County Health Department	419-755-4500
Mansfield Water Treatment	419-755-9806
Mansfield Sewer Treatment	419-755-9809
Ohio Edison	1-888-544-4877
Columbia Gas	1-800-344-4077
CCI Cleanup Contractors Inc. (Matt Rogers)	419-982-2006 (937-564-3796)
National Response Center	800-424-8802
State Emergency Response Commission	614-224-0946
USEPA Region V Administrator	312-353-2000

NEARBY BUSINESS CONTACTS

Air Gas	45 East Longview Avenue	419-524-0511
Ashland Rail Road	114 West Longview Avenue	419-522-0173/419-525-3310 419-522-3245/419-525-2822
Edge Plastics	449 Newman Street	419-522-6696
Kokosing Materials	45 East Longview Avenue	419-526-2852 419-524-5656
Rumpke	621 Newman Street	419-524-6277

SECTION 1: SCOPE AND PURPOSE

1.1 Scope

This plan is developed under the following requirements:

- 29 CFR 1910.38—Emergency Action Plans
- 40 CFR 262 Subpart M—Preparedness, Prevention, and Emergency Procedures for Large Quantity Generators (RCRA) [OAC 3745-52-250(-265)]

The facility is generally not a Large Quantity Generator (LQG), but the Contingency Plan elements are maintained in the event that the facility generator status changes.

1.2 Purpose

This plan is intended to minimize hazards to human health and the environment by establishing procedures to prepare for, prevent, and respond to emergencies such as fires, explosions, or used oil or hazardous waste releases to the environment.

This plan must be implemented immediately whenever there is a fire, explosion, or release of used oil or hazardous waste which could threaten human health or the environment.

SECTION 2: EMERGENCY COORDINATOR

2.1 Duties

At all times, there must be at least one employee either on the facility premises or on call (i.e., available to respond to an emergency by reaching the facility within a short period of time) with the responsibility for coordinating all emergency response measures. This emergency coordinator must be thoroughly familiar with all aspects of the facility's contingency plan, all operations and activities at the facility, the location and characteristics of waste handled, the location of all records within the facility, and the facility layout. In addition, this person must have the authority to commit the resources needed to carry out the contingency plan. Further duties of the Emergency Coordinator are described in Section 4 of this plan—Emergency Procedures.

2.2 Designated Emergency Coordinator

The Emergency Coordinators for this site are listed in the Contact Information directory at the front of this plan.

SECTION 3: PREPARDNESS AND PREVENTION

3.1 Maintenance and Operation of Facility

The facility is maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of used oil, hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

3.2 Emergency Equipment

Internal Communications and Alarm Systems: The facility utilizes an internal phone paging system. Furthermore, a general alarm system is in place in the event of fire or other emergency requiring evacuation.

Telephones: Telephones and personal cell phones are used to summon emergency assistance such as local police, fire department, and state or local emergency response teams.

Portable fire extinguishers, spill control equipment: ABC dry chemical, CO_2, and halogen portable fire extinguishers are located throughout the facility to help fight small fires.

Fire Suppression System: The facility is equipped with a high volume flow rate water spray system to supply sufficient water for fire suppressions.

Spill kits: Spill kits are located strategically around the facility

- Small spill kits: 2 absorbent socks, 4 absorbent mats, repair putty, dust mask, gloves, safety glasses, trash bag.
- Large spill kits: 65-gallon over pack drum containing absorbent pads and socks, trash bags, nitrile gloves, goggles.

Emergency lighting and exit lights

Personal protection equipment: Gloves, Tyvek coats, safety glasses, hard hats, hearing protection, and dust masks

First Aid kits and AED machines

A list of fire extinguishers and emergency equipment with maps showing their locations can be found in Appendix A.

3.3 Testing and Maintenance of Equipment

Testing Frequency:

- Communications and alarm systems: Annually
- Portable fire extinguishers: Annually
- Fire suppression system: tested Annually
- Emergency lighting: Monthly/Annually

3.4 Access to Communications or Alarm Systems

Whenever hazardous waste is being handled, all personnel involved in the operation must be in direct visual or voice contact with another employee.

3.5 Required Aisle Space

The facility maintains adequate aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency.

3.6 Arrangements with Local Authorities

Letters have been sent along with copies of this plan to the following local authorities in order that they may be more prepared to assist in an emergency:

- Police Department
- Mansfield Fire Department (Primary)
- CCI Cleanup Contractors Inc.
- Richland County Local Emergency Planning Committee
- State Emergency Response Commission
- Avita Hospital

The letter is included in Appendix B. The arrangement letters are sent along with the Quick Reference Guide (Appendix D).

SECTION 4: EMERGENCY PROCEDURES

4.1 Fire

First Responder's Duties:

- Call 911

- In the event of a fire, the employee who detects the fire will activate the alarm and communicate an emergency situation to the Supervisor via PA system or verbal communication.

- *Only the fire department should shut off the fire suppression system once it has been activated.*

- If the fire is small, and the First Responder can do so safely, attempt to extinguish the fire using one of the portable fire extinguishers available throughout the facility.

- Personnel assigned to perform specific emergency actions will be periodically trained in their duties.

- Fire extinguishers are provided throughout the building and should only be used on incipient fires, if you feel it is safe to do so. An incipient fire is a small fire (i.e. trash can fire). Most extinguishers are only capable of extinguishing a small fire. A rule of thumb is that if the flames are taller than you or a sprinkler head has fused, then an extinguisher will not extinguish this fire.

- Types of extinguishers: There are four different classifications of fires and an appropriate extinguisher for each. An extinguisher not rated for a specific type of fire will not put out that type of fire and may in fact spread the fire or pose a safety hazard. Extinguishers are marked for the types of fires that they are effective in extinguishing.

- Type A Trash, Wood, Paper
- Type B Flammable Liquids, Grease
- Type C Electrical Equipment
- Type D Burning Metals (i.e. magnesium)

Emergency Coordinators / Company Officers:

- Call 911 (or verify that this has already been done)

- Activate internal alarms, use phones, PA system, and verbal communication to initiate evacuation procedures.

The Emergency Coordinator is in charge of the situation and will commit any necessary resources until the fire department arrives to assume incident command.

- The Emergency Coordinator or company officer will call in additional resources as they deem fit such as Ohio EPA—DERR, spill responders, safety, or environmental personnel.

- During an emergency, the Emergency Coordinator will take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other used oil or hazardous waste at the facility. These measures include, where applicable, stopping processes and operations, collecting and containing released used oil or waste, and removing or isolating containers.

- If the facility stops operation in response to a fire, explosion, or release, the Maintenance Team and Emergency Coordinator will monitor for leaks
- Notify appropriate local authorities if it is determined that evacuation of local areas may be advisable, and be available to help local officials in deciding whether local areas should be evacuated.

- If it is determined that the emergency could threaten human health, or the environment, outside the facility, immediately contact the National Response Center (800-424-8802) and Ohio EPA Emergency Response (614-224-0946) and provide the following information:

    - Name and telephone number of reporter
    - Name and address of facility
    - Time and type of incident (e.g., release, fire)
    - Name and quantity of material(s) involved, to the extent known
    - The extent of injuries, if any
    - The possible hazards to human health, or the environment, outside the facility

All Personnel:

- Once an evacuation has been communicated via alarm system, phone, PA system, or verbally, follow the evacuation plan found in Appendix C.

- Follow the directions of the Emergency Coordinator or Incident Commander once they arrive on site.

4.2 Release of Chemicals

First Responder:

- Notify the Emergency Coordinator for:
  - Oil spill >25 gallons
  - Any size spill off-site or reaching water
  - Hazardous waste or corrosive liquid (pH<2 or pH>2.5) spill >5 gallons

Communicate the type and extent of the release if possible.

In general, the following steps are taken:

- Identify the released chemical and use appropriate PPE
- Eliminate potential spark sources
- If possible and safe to do so, identify and shut down source of the discharge to stop the flow
- Contain the discharge with sorbents, berms, fences, trenches, sandbags, or other material
- Contact the Emergency Coordinator or senior manager.
- The Emergency Coordinator will contact regulatory authorities and the response organization, as necessary
- Collect and dispose of recovered products according to regulation.

  Complete the Discharge Notification Form found in Appendix I of the Spill Prevention, Control and Countermeasure Plan.

Response to a Minor Discharge

A "minor" discharge is defined as one that poses no significant harm (or threat) to human health and safety or to the environment. Minor discharges are generally those where:

- The quantity of product discharged can be handled by Nanogate personnel without outside assistance;
- Discharged material is easily stopped and controlled at the time of the discharge;
- Discharge is localized near the source;
- Discharged material will not reach water;
- There is little risk to human health or safety; and
- There is little risk of fire or explosion.

Minor discharges can usually be cleaned up by Nanogate personnel. The following guidelines apply:

- Immediately notify the Emergency Coordinator for:
  - Oil spill >25 gallons
  - Any size spill off-site or reaching water
  - Hazardous waste or corrosive liquid (pH<2 or pH>2.5) spill >5 gallons

- Under the direction of the Emergency Coordinator, contain the discharge with discharge response materials and equipment

- Place discharge debris in properly labeled waste containers

Response to a Major Discharge

A "major" discharge is defined as one that cannot be safely controlled or cleaned up by facility personnel, such as when:

- The discharge is large enough to spread beyond the immediate discharge area;
- The discharged material enters water;
- The discharge requires special equipment or training to cleanup;
- The discharged material poses a hazard to human health or safety; or
- There is danger of fire or explosion.

In the event of a major discharge, the following guidelines apply:

- All personnel must immediately evacuate the discharge area and move to a staging area at a safe distance from the discharge

- If the Emergency Coordinator is not present at the facility, the senior onsite person shall notify the Emergency Coordinator of the discharge and has the authority to initiate notification and response. Certain notifications are dependent of the circumstances and type of discharge

- Call for medical assistance if workers are injured

- Notify the Fire Department or Police Department

Emergency Coordinators / Company Officers:

- Call 911 if the situation warrants

- Activate internal alarms, use phones, PA system, and verbal communication to initiate evacuation procedures if warranted.

- The Emergency Coordinator is in charge of the situation and will commit any necessary resources until the fire department arrives to assume incident command.

- The Emergency Coordinator or company officer will call in additional resources as they deem fit such as Ohio EPA—DERR, spill responders, safety, or environmental personnel.
    - For major discharges, releases off company property, or releases into water, environmental support must be contacted (see Nanogate Support Contacts at the front of this plan)

- During an emergency, the Emergency Coordinator will take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other used oil or hazardous waste at the facility. These measures include, where applicable, stopping processes and operations, collecting and containing released used oil or waste, and removing or isolating containers.

- If the facility stops operation in response to a fire, explosion, or release, the Maintenance Team and Emergency Coordinator will monitor for leaks.

- Notify appropriate local authorities if it is determined that evacuation of local areas may be advisable, and be available to help local officials in deciding whether local areas should be evacuated.

- If it is determined that the emergency could threaten human health, or the environment, outside the facility, immediately contact the National Response Center (800-424-8802) and provide the following information:

    - Name and telephone number of reporter
    - Name and address of facility
    - Time and type of incident (e.g., release, fire)
    - Name and quantity of material(s) involved, to the extent known
    - The extent of injuries, if any

- The possible hazards to human health, or the environment, outside the facility Call the spill response and cleanup contractor listed in the Emergency Contacts list at the front of this plan;

- The Emergency Coordinator shall coordinate cleanup and obtain assistance from a cleanup contractor or other response organization as necessary.

All Personnel:

- Once an evacuation has been communicated via alarm system, phone, PA system, or verbally, follow the evacuation plan found in Appendix C.

- Follow the directions of the Emergency Coordinator or Incident Commander once they arrive on site.

4.3 Severe Thunderstorms and Tornado

a. *Severe Thunderstorms and/or Tornado Watch* – supervisors will monitor the local weather, by radio or internet.
b. *Tornado Warning* – if appropriate, an outside watch will be posted. The Plant Manager or designated official may stop production and move employees to a tornado shelter.

- Seek inside shelter in one of the following areas:
    a. North molding restroom and paint line restroom.
    b. Center basement under offices.
    c. South shipping dock office.
    d. Tool Room office.
    e. E-Brite office.
    f. Interior office/restroom areas – 501 Newman Street
- Stay away from outside walls and windows.
- Use arms to protect head and neck.
- Remain sheltered until the tornado threat is announced to be over by the Plant Manager or designated official.
- When the tornado is over, be cautious of downed power lines, open holes, trip hazards, flooding or chemical spills.

4.4 Flood

- *If indoors:*
    a. Be ready to evacuate as directed by the Plant Manager or designated official.
    b. Follow the recommended primary or secondary evacuation routes.

- *If outdoors:*
    a. Climb to high ground and stay there.
    b. Avoid walking or driving through flood water.
    c. If car stalls, abandon it immediately and climb to higher ground or on top of the car.

During the flood, be cautious of strong currents and undertows, storm drains, floating objects, electrical and shock hazards, hazardous material spills and dirty, disease-filled water.

Flood: Rocky Fork.
This property borders the flood zone of Rocky Fork, along the east property line. The 100-year flood elevation is listed at 1,151-ft. and the 500-year elevation is 1152.5-ft. (NAVD 1988). Most of the buildings are elevated well above the flood zone. The property elevations increase to the south to 1165-ft. Most building are above 1,160-ft.

Exposed buildings include the lower level loading dock of the Fab Shop, which is at 1,150.5-ft. Up to 2.5-ft. of water would be expected in this concrete loading dock. No contents. Minimal damage expected. No business interruption. Main level of the Fab Shop is 1,154.5-ft.

The lower level of the North Mold Building is a reinforced concrete structure used for storage of filters and equipment spare parts. The entrance into this area is 1,151-ft. The floor slopes up to the lower level floor level, which is at 1,152.5-ft. No water would be expected in the 100-year event. Very light floor wetting could result in the 500-year event. Again, this is an unfinished concrete structure. No storage directly on the floor (shelves). Minimal cleanup and damage expected. No interruption to operations.

There are two main entrances to the property. The west entrance would be blocked by flood waters, the east entrance is at 1,160-ft. and would be accessible for parking, shipping and receiving.

Minimal damages are expected in the event of the 100 or 500-year flood events. Minor cleanup of the concrete floors and walls would be required. The total exposed areas measure approximately 2,200 sq. ft. No LE has been generated. A detailed FERP is not warranted.

Surface Water:
There are a couple downward sloping areas for loading docks and lower level equipment rooms. The contributing areas associated are small and surface water flooding is not expected.

4.5 Earthquake

- Stay calm and await instructions from the Plant Manager or designated official.
- Keep away from windows, filing cabinets, cranes, machines and electrical power.
- Assist people with disabilities in finding a safe place.
- If possible, exit the premises, or find shelter as instructed by the Plant Manager or designated official.
- When the earthquake is over, be cautious of downed power lines, open holes or pits, trip hazards, flooding or chemical spills.

4.6 Blizzard

- *If you are indoors:*
    a. Stay calm and await instructions from the Plant Manager or designated official.
    b. Stay indoors.
    c. If there is no heat:
        - Close off unneeded rooms or areas.
        - Stuff towels or rags in cracks under doors.
        - Cover windows at night.
    d. Eat and drink. Food provides the body with energy and heat. Fluids prevent dehydration.
    e. Wear layers of loose-fitting, light-weight, warm clothing, if available.

- *If outdoors:*
    a. Find a dry shelter. Cover all exposed parts of the body.
    b. If shelter is not available:
        - Prepare a lean-to, wind break, or snow cave for protection from the wind.
        - Build a fire for heat and to attract attention. Place rocks around the fire to absorb and reflect heat.
        - Do not eat snow. It will lower your body temperature. Melt it first.

- *If stranded in a car or truck:*
    a. Stay in the vehicle.
    b. Run the motor about ten minutes each hour. Open windows a little for fresh air to avoid carbon monoxide poisoning. Make sure the exhaust pipe is not blocked.
    c. Make yourself visible to rescuers:
        - Turn on the dome light at night when running the engine.
        - Tie a colored cloth to your antenna or door.
        - Raise the hood after the snow stops falling.
    d. Exercise to keep blood circulating and to keep warm.

4.7 Bomb Threat

(See FBI Bomb Threat Call Checklist on following page)

- If you observe a suspicious object or potential bomb on site, DO NOT HANDLE THE OBJECT! Clear the area and immediately call security or 911.

- Any person receiving a phone call bomb threat should ask the caller:
    - When is the bomb going to explode?

- Where is the bomb located?
- What kind of bomb is it?
- What does it look like?
- Why did you place the bomb?

- Keep talking to the caller as long as possible and record the following:

  - Time of call.
  - Approximate age and sex of caller.
  - Speech pattern, accent, possible nationality, etc.
  - Emotional state of the caller.
  - Background noise.

- If possible, have someone contact Security and 911 while you are on the phone with the caller.

- Security will contact the authorized personnel to conduct a detailed bomb search. Employees are requested to make a cursory inspection of their area for suspicious objects and to report the location to Security. Again, DO NOT TOUCH ANY SUSPICIOUS OBJECTS! Do not open drawers, cabinets, or turn lights off.

- If necessary, evacuate following the evacuation plan in. Generally speaking, building alarm systems SHOULD NOT BE MANUALLY ACTIVATED during bomb threat situations, unless done so by someone in authority.

FBI BOMB PROGRAM **EBCC-X**

BOMB THREAT CALL CHECKLIST

Questions to Ask

1. When is bomb going to explode?
2. Where is it right now?
3. What does it look like?
4. What kind of bomb is it?
5. What will cause it to explode?
6. Did you place the bomb?
7. Why?
8. What is your address?
9. What is your name?

Exact Wording of the Threat:

_____
_____
_____
_____
_____
_____
_____
_____

Sex of caller _____ Age _____ Race _____ Length of call _____

BOMB THREAT QUESTIONNAIRE:

CALLER'S VOICE:

_____ Calm	_____ Laughing	_____ Lisp	_____ Disguised
_____ Angry	_____ Crying	_____ Raspy	_____ Accent
_____ Excited	_____ Normal	_____ Deep	_____ Familiar
_____ Slow	_____ District	_____ Ragged	_____ If voice is familiar
_____ Rapid	_____ Slurred	_____ Clearing throat	_____ who did it sound like?
_____ Soft	_____ Nasal	_____ Deep breathing	_____
_____ Loud	_____ Stutter	_____ Cracking voice	_____

BACKGROUND SOUNDS:

_____ Street noises	_____ House noises	_____ Factory	_____ Local
_____ Crockery	_____ Motor	_____ Machinery	_____ Long distance
_____ Voices	_____ Office Machinery	_____ Clear	_____ Animal Noises
_____ Booth	_____ PA System	_____ Static	_____ Music

Other _____

THREAT LANGUAGE:

_____ Well spoken (educated)	_____ Foul	_____ Incoherent
_____ Irrational	_____ Taped	_____ Message read by threat maker

REMARKS
:

_____
_____
_____

Report call immediately to _____ Phone number _____

Fill out completely, immediately after bomb threat Date / /
Phone number
Name _____ Position _____

EBCC-X Bomb Threat Call Checklist

4.8 Suspicious Mail/Packages

(See USPS Suspicious Mail or Packages Poster on following page)

- What a suspicious package or mail might look like:
    - No return address.
    - Restrictive markings.
    - Misspelled words. Bold type or written.
    - Unknown powder or suspicious substance.
    - Possibly mailed from a foreign country. Excessive postage.
    - Excessive tape.
    - Oily stains, discoloration on wrapper.
    - Strange odor.
    - Incorrect title or addressed to title only.
    - Rigid or bulky.
    - Lopsided or uneven.
    - Protruding wires.

- If you receive a suspicious package or mail:
    - Stop! Don't handle
    - Isolate it immediately.
    - Don't open, smell or taste
    - **I**mmediately notify security or 911
    - Wash your hands with soap and water

SUSPICIOUS MAIL OR PACKAGES

Protect yourself, your business, and your mailroom.

If you receive a suspicious letter or package:

- Stop. Don't handle.
- Isolate it immediately.
- Don't open, smell, or taste.
- Activate your emergency plan. Notify a supervisor.

If you suspect the mail or package contains a bomb (explosive), or radiological, biological, or chemical threat:

- Isolate area immediately
- **Call 911**
- Wash your hands with soap and water

UNITED STATES POSTAL SERVICE.

SECTION 5: POST-EMERGENCY PROCEDURES

5.1 Recovered Used Oil and Waste

Immediately after an emergency, the emergency coordinator must provide for recycling, treating, storing, or disposing of recovered oil or waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility.

5.2 Incompatible Storage

The Emergency Coordinator will ensure that, in affected area(s) of the facility, no waste or used oil that may be incompatible with the released material is recycled, treated, stored, or disposed until cleanup procedures are completed.

5.3 Decontamination

The Emergency Coordinator will ensure that all emergency equipment listed in this plan is cleaned and fit for its intended use before operations are resumed.

5.4 Reporting

Before operations are resumed in affected area(s) of the facility, the owner or operator must notify the EPA Regional Administrator, the State Emergency Response Commission, and the Franklin County Local Emergency Planning Committee that the facility is in compliance with sections 5.2 and 5.3 above.

The owner or operator must note in the operating record the time, date and details of any incident that requires implementing this plan. Within 15 days after the incident, he must submit a written report on the incident to the Regional Administrator with the following information:

- Name, address, and telephone number of the owner or operator
- Name, address, and telephone number of the facility
- Date, time, and type of incident (e.g., fire, explosion)
- Name and quantity of material(s) involved
- The extent of injuries, if any
- An assessment of actual or potential hazards to human health or the environment, where this is applicable
- Estimated quantity and disposition of recovered material that resulted from the incident

5.5 Post-Incident Assessment

- After a fire, explosion, or release, the Emergency Coordinators and company officers will coordinate post response assessments to determine the effectiveness of the response.

SECTION 6: TRAINING REQUIREMENTS

6.1 Emergency Coordinators

- First Responder Operations Level (OSHA 8 hour – 29 CFR 1910.120(q)(6)(ii))

6.2 Spill Responders

- First Responder Operations Level (OSHA 8 hour – 29 CFR 1910.120(q)(6)(ii))*
- First Responder Technician Level (OSHA 24 hour – 29 CFR 1910.120(q)(6)(iii))*
- Spill Prevention, Control, and Countermeasure (40 CFR 112.7(f))
- RCRA, Hazardous Waste (40 CFR 265.16)

**Required if expected to actively respond to emergencies outside the immediate release area to an occurrence which results, or is likely to result, in an uncontrolled release of a hazardous substance (excludes oil). Responses to incidental releases of hazardous substances where the substance can be absorbed, neutralized, or otherwise controlled at the time of release by employees in the immediate release area, or by maintenance personnel are not considered to be emergency responses.*

6.3 Maintenance

- Facility Lock-Down
- Access Control

6.4 All Employees

- Hazard Communication (OSHA 1910.1200(h))
- First Responder Awareness Level (OSHA 29 CFR 1910.120(q)(6)(I))
- Evacuation Procedures
- Supervisors will review the Emergency Action Plan with each employee at the following times:
    a. During new employee orientation.

b. When the employee is initially assigned to a job, through on the job training (evacuation routes).
c. When an employee's responsibilities or designated actions under the plan change.
d. When new equipment, materials, or processes are introduced into the workplace that may affect the plan.
e. When the layout or design of the facility changes.
f. When the plan is changed.
g. Annually, during mandatory evacuation and tornado drills.

- After a drill, Supervisors will report problems or shortcomings, such as:
  a. Doors that would not open.
  b. Employees who enter storage closets instead of exiting.
  c. Employees who get lost or are confused about their duties and responsibilities.

- Problems or shortcomings must be addressed before a real emergency occurs.

SECTION 7: PLAN UPDATES

This plan must be updated whenever:

- Applicable regulations are revised

- The plan fails in an emergency

- The facility changes—in its design, construction, operation, maintenance, or other circumstances—in a way that materially increases the potential for fires, explosions, or releases of uses oil or hazardous waste, or changes the response necessary in an emergency

- The list of Emergency Coordinators changes

  The list of emergency equipment changes

SECTION 8: EHS Administrative Duties

The Nanogate North America Environmental Health and Safety (EHS) Director has overall responsibility for the Emergency Action Plan, including the following:

- Developing, maintaining, reviewing, and updating a written Emergency Action Plan.

- Notifying the proper rescue and law enforcement authorities, the Nanogate North America, President, and Vice-President in the event of an emergency affecting Nanogate North America LLC.

- Taking security measures to plan for the protection of employees.

- Integrating the Emergency Action Plan with any other emergency plan covering the building or work area.

- Distributing procedures for reporting emergencies, the location of safe exits, and evacuation routes to each employee.

- Conducting drills and/or discussions to acquaint employees with emergency procedures and to judge the effectiveness of the plan.

- Training designated employees in emergency response such as the use of fire extinguishers and first aid.

- Deciding which emergency response to initiate (evacuate or not).

- Maintaining records and property as necessary.

- Ensuring that Nanogate North America meets all local fire codes, building codes, and regulations.

Copies of this plan may be obtained on the training intranet site or through the EHS department located at 515 Newman Street, Mansfield, Ohio 44902 for employees, their representatives, and any person upon written request.

The Plant Manager or Senior Supervisor has full authority to implement the Emergency Action Plan if he/she believes and emergency might threaten human health.

Plan Update Log

5/26/2017	Plan rewritten	Ralph F Hall
2/13/2018	Plan revised	Ralph F Hall
01/02/2019	Plan reviewed	Ralph F Hall
8/7/2019	Plan Revised	Ralph F Hall
06/11/2020	Plan Revised	Ralph F Hall
1/1/2021	Plan includes 501 Newman Street	Ralph F Hall
4/25/22	Updated Emergency Contacts, added Quick Reference Guide, minor editing	Rachel Wilson

APPENDICES

Fire Extinguishers and Emergency Equipment

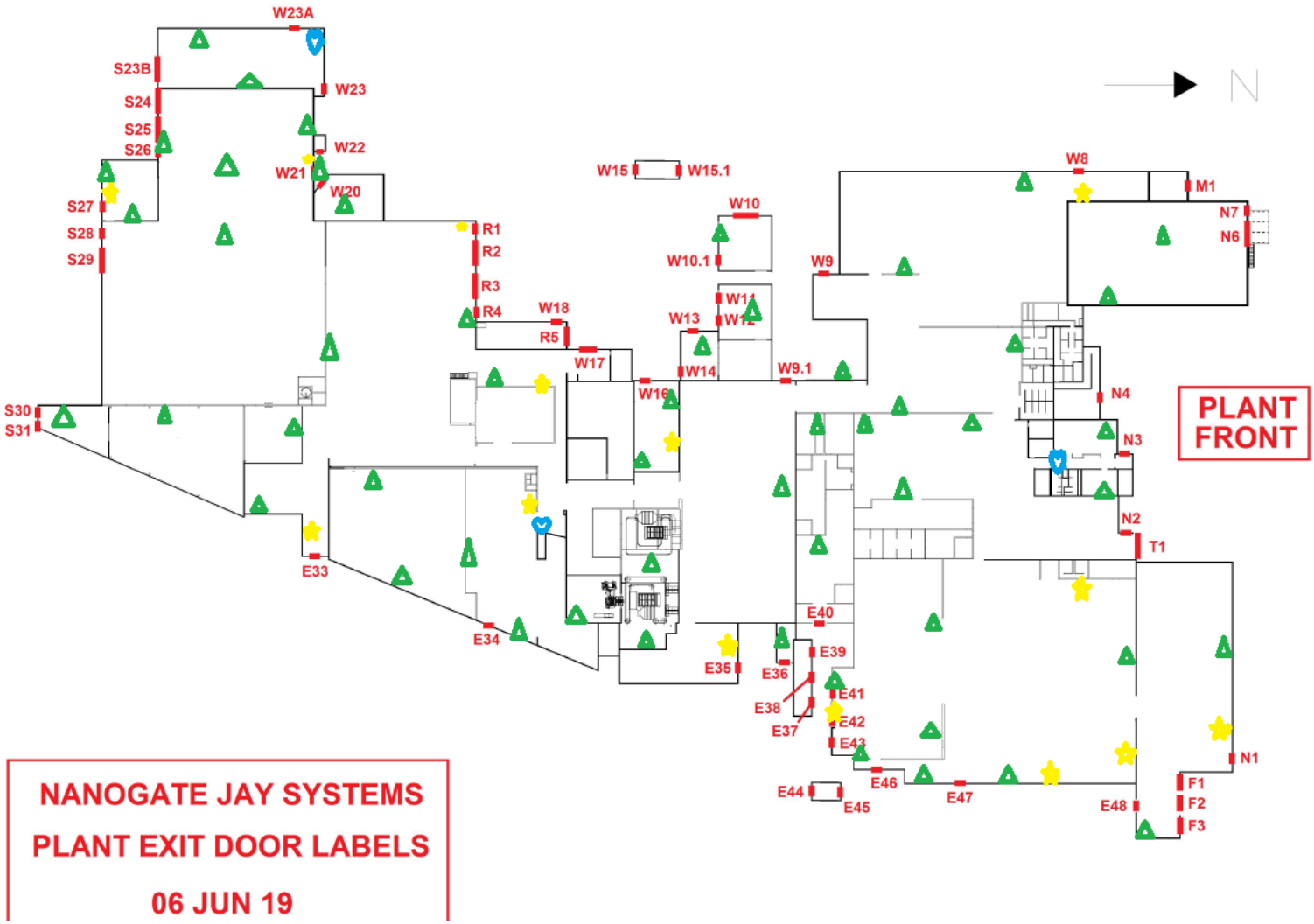
Letters of Arrangements with Local Authorities

Evacuation Plan

Regulations

Emergency Action and Contingency Plan Verification

Appendix A: Fire Extinguishers and Emergency Equipment



Green- Fire Extinguishers, Yellow- Spill Kits, Blue- AED/First aid kits and Red exit doors

Appendix B: Letters of Arrangements with Local Authorities

(Date)

SUBJECT: Arrangements with Local Authorities per 40 CFR 265.37

Dear Sir or Madam:

As a large quantity generator of hazardous waste, I am required to make arrangements with local and state emergency response teams to help ensure proper response in the event of an emergency. Emergency response personnel, both state and local (i.e. fire, police, ambulance, and hospital), must be made aware of:

- Layout of the facility—facility evacuation maps are located in Appendix D of the plan.
- Properties of the hazardous waste handled at the facility and associated hazards—the facility generates flammable and corrosive hazardous wastes.
- Places where personnel would normally be working—the footprint of the facility is relatively large, and personnel may be working anywhere on site. All doors have identification numbers on them.
- Entrances to roads inside the facility—the facility has controlled access through two primary entrances on 150 East Longview Avenue.
- Possible evacuation routes—facility evacuation maps are located in Appendix D of the plan.

This information is to be used by your department to better plan for an emergency response at this facility.

If you decline to enter into this arrangement, please let us know so that we may document the refusal as required in the regulations. Thank you.

Sincerely,
Nanogate North America LLC.
Rachel Wilson, Safety Coordinator
Office: 419-521-0338
Email rachel.wilson@nanogate.com

Appendix C: Evacuation Plan

Evacuation Plan:

Conditions under which an evacuation would be necessary: A wide variety of emergencies both man-made and natural, may require a workplace to be evacuated. These emergencies include - fires, explosions, floods, earthquakes, hurricanes, tornadoes, toxic material releases, radiological and biological accidents, civil disturbances and workplace violence.

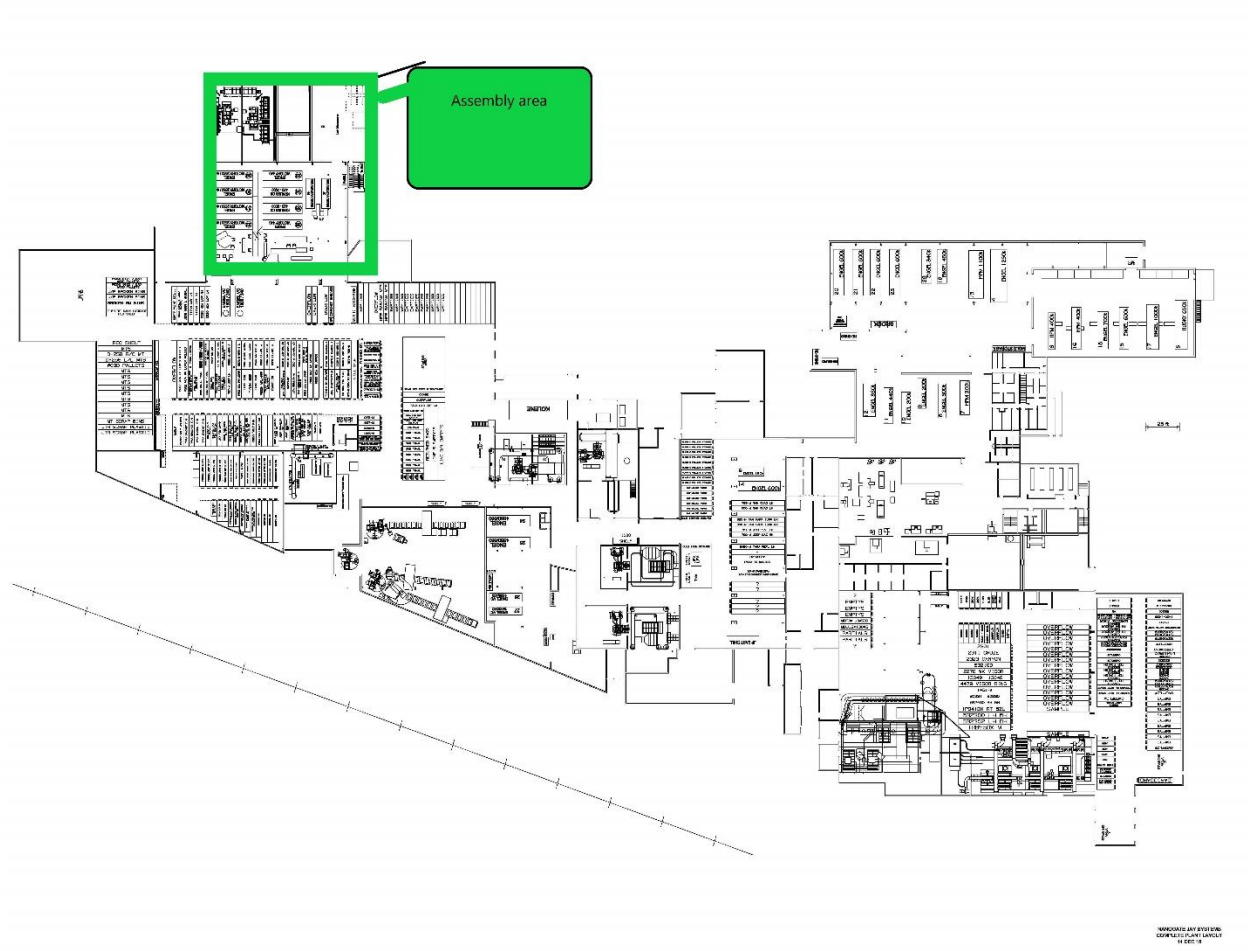
Routes and exits: If an evacuation is called, take the nearest safe exit, and congregate at the assembly area at the north parking area for 150 East Longview or the east side of the building for 501 Newman Street.

Procedures for assisting visitors and employees to evacuate: Supervisors are to coordinate the evacuation. They will check offices, bathrooms, and other spaces before being the last person to exit an area.

Employees who may remain to shut down critical operations before evacuating: If safe to do so, operators may be asked to stay at their post to oversee continued operations or to safely shut down operations before evacuating themselves.

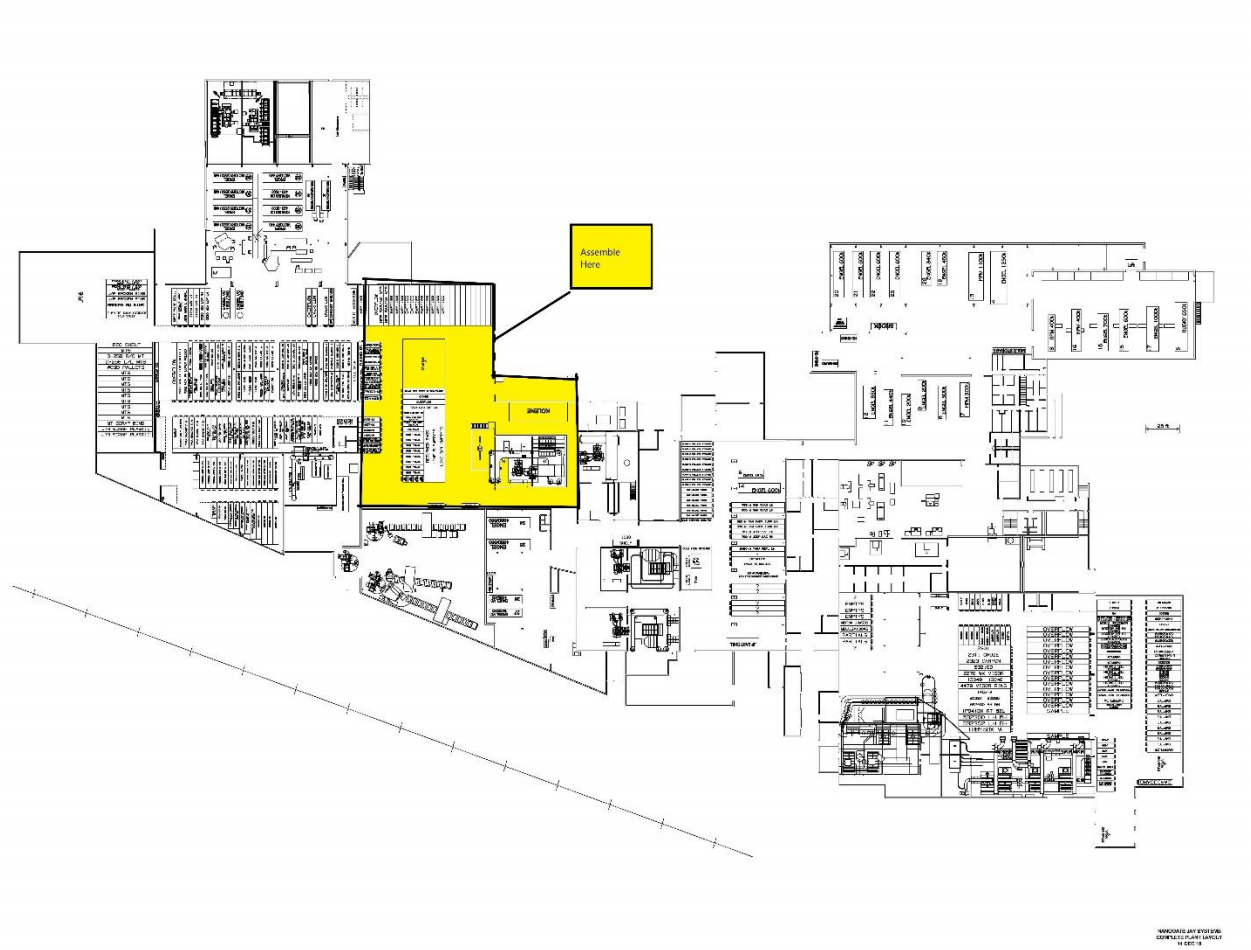
Accounting for employees after an evacuation: Supervisors will take a head count after the evacuation to the assembly area. Identify the names and last known locations of anyone not accounted for and pass them to the official in charge. Accounting for all employees following an evacuation is critical. Confusion in the assembly areas can lead to delays in rescuing anyone trapped in the building, or unnecessary and dangerous search-and-rescue operations.

R&D area

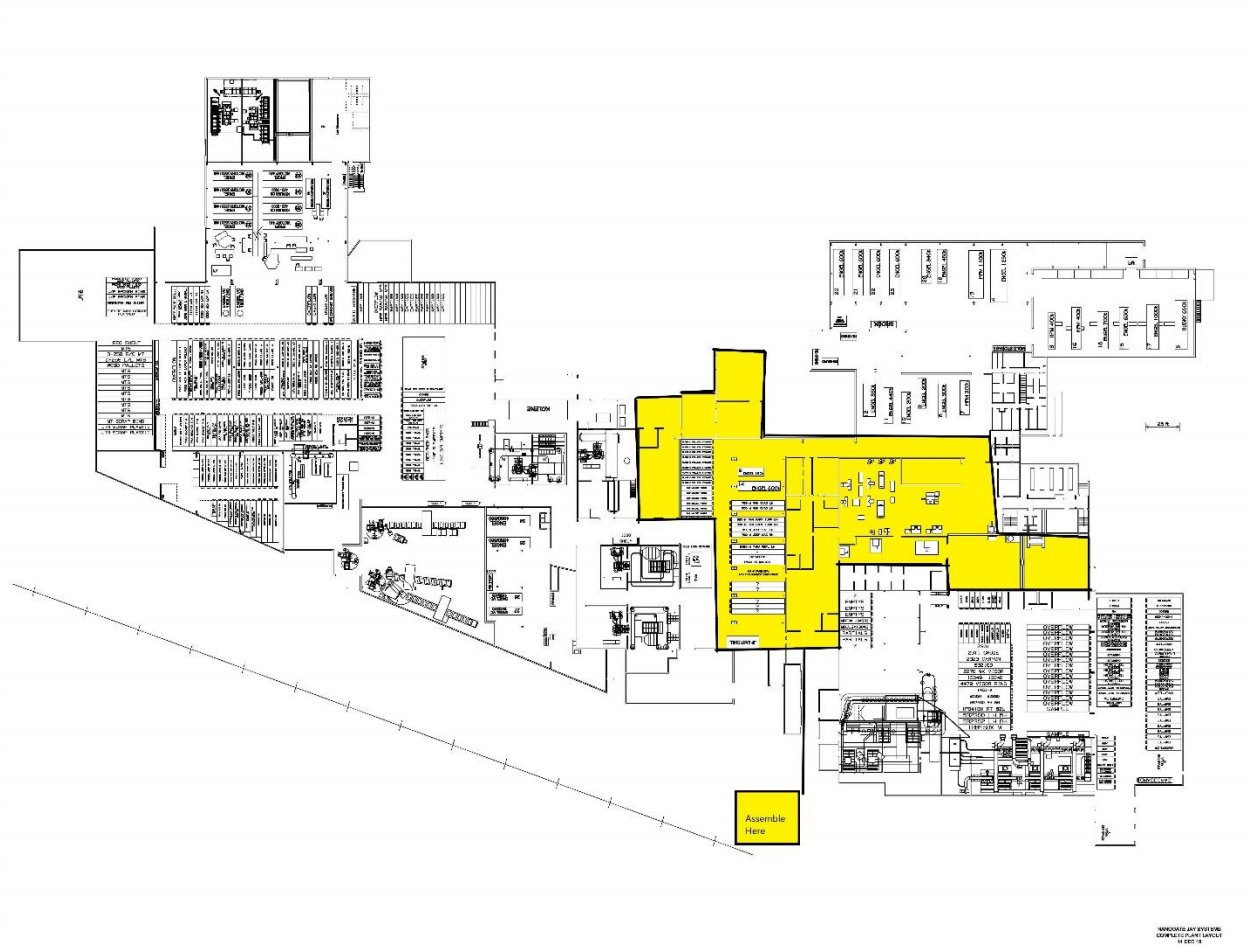


E-Brite area

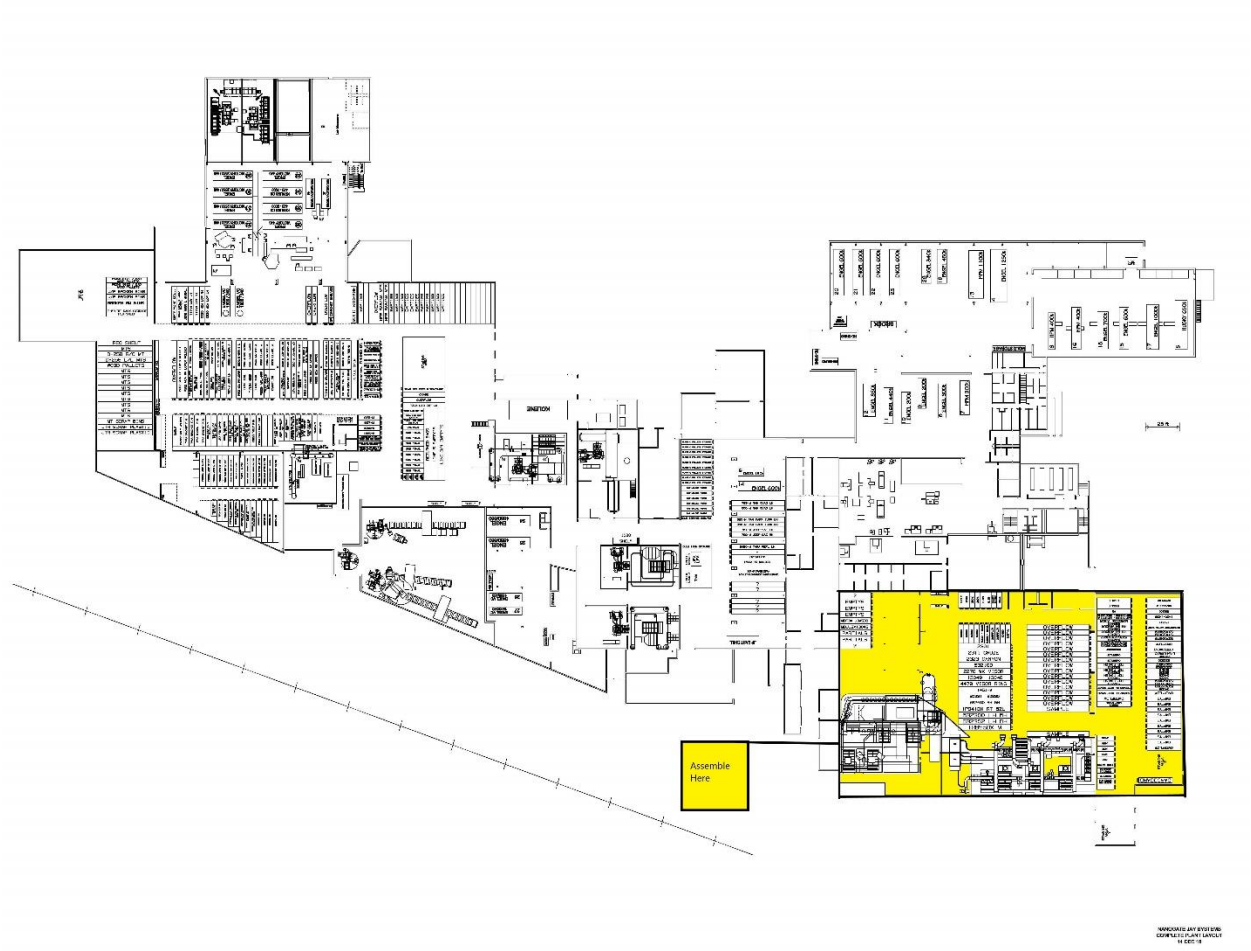
Shipping, Kolene and E-Brite 8 area



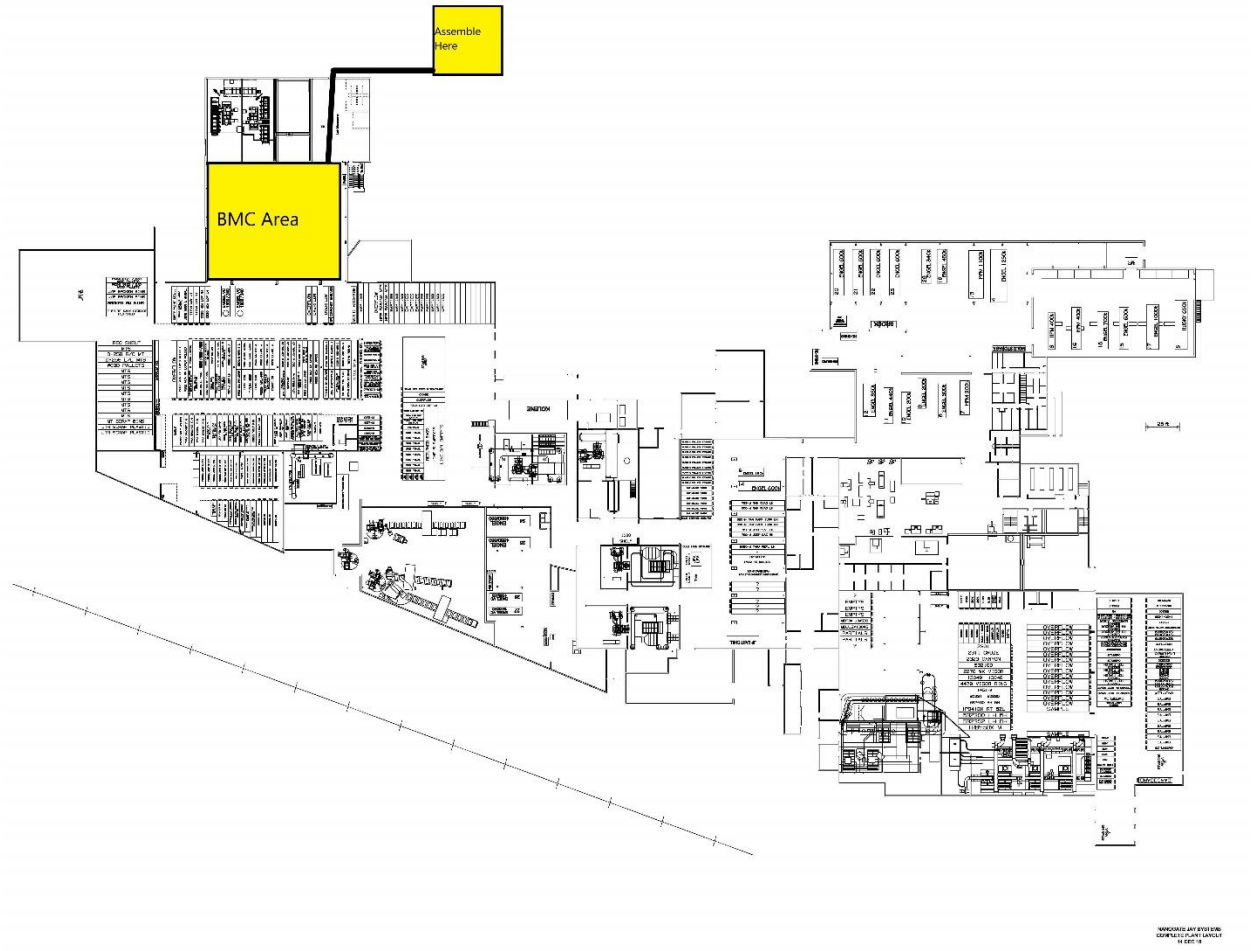
Molding and Tool Room



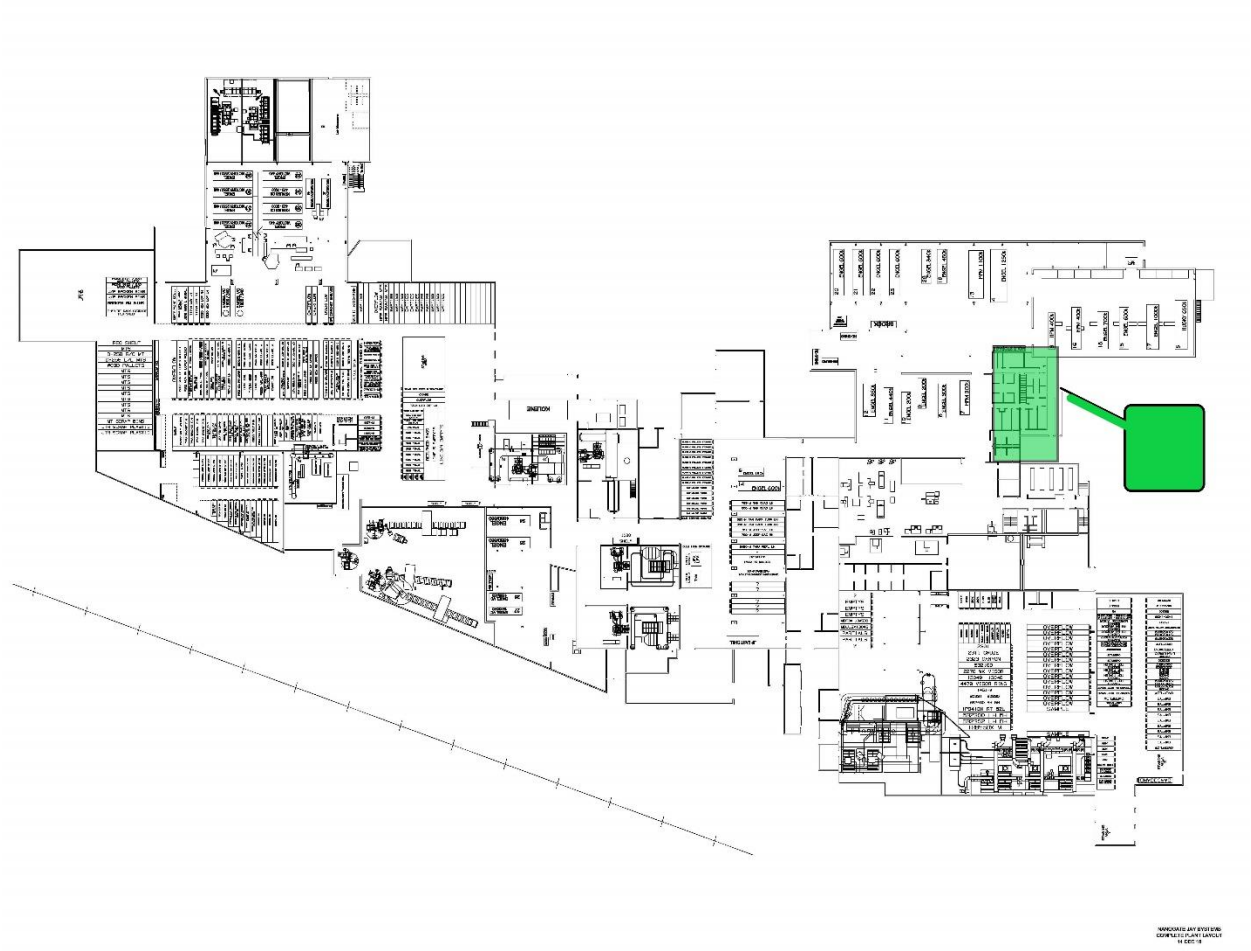
Paint lines



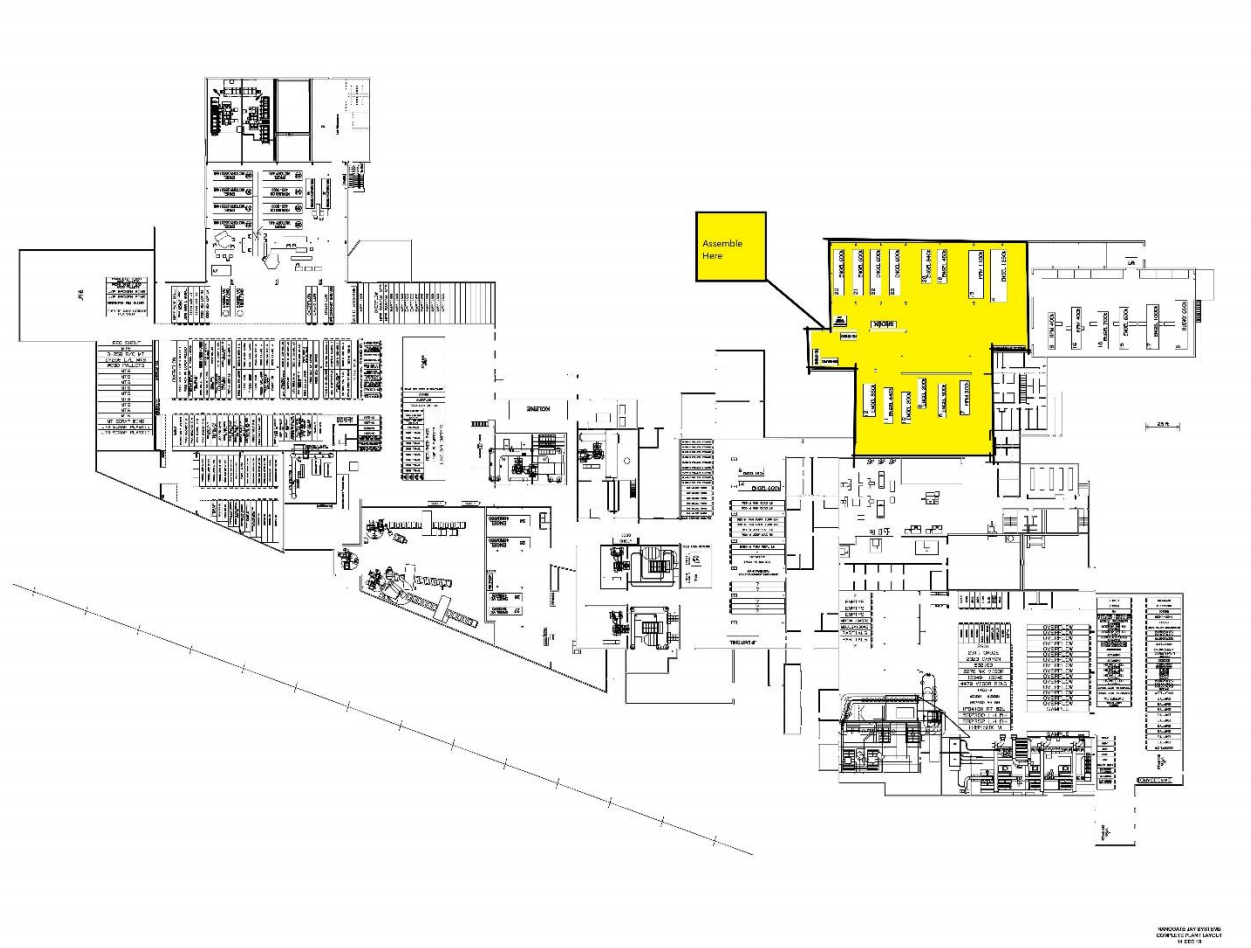
BMC Area



Front Offices area



Molding area



Appendix D – RCRA Contingency Plan Quick Access Guide

RCRA Contingency Plan

Quick Reference Guide

Nanogate North America

150 E. Longview Ave. Mansfield, Ohio 44903

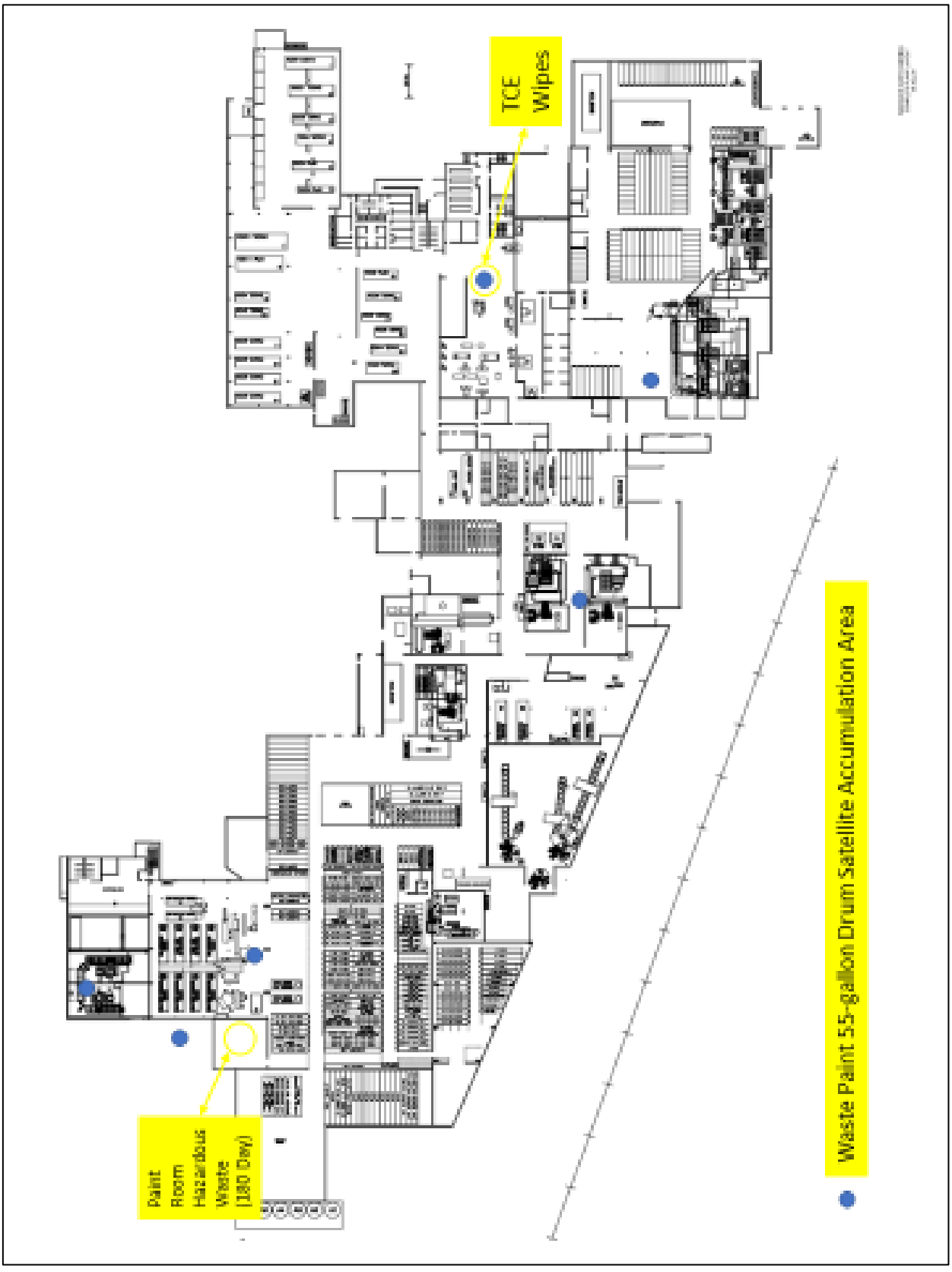
NANOGATE NORTH AMERICA EMERGENCY PERSONNEL

NAME	POSITION	DESK #	CELL#
Paul Boggs	CEO	419-521-0134	419-295-2137
Dave Rankin	VP Director of Technology	419-521-0133	419-295-4275
Dan Hensel	Director of Production Operations	419-521-0174	419-651-3218
Ken Bodnar	Maintenance Manager	419-521-0168	567-303-8263
Scott Bobst	Environmental Health Manager	419-521-0366	419-632-4400
Rachel Wilson	Safety Coordinator	419-521-0175	567-224-8819

The following hazardous waste may be present at the site:

Waste Name	Hazard	Quantity Onsite	Location
Waste Paint (90/180-day storage location)	Ignitable	0-6 drums	See map below
Waste Paint Satellite Accumulation Areas	Ignitable	1 drum	See map below
Waste Styrene	Ignitable	1 drum	See map below
Trichloroethylene Wipes	Ignitable / Toxic	1 drum	See map below

Hazardous Waste Storage Locations



Aerial Street View

Fire Hydrant

Access to the facility is from East Longview Ave. The on-site notification system, in case of emergencies, is the telephone paging system.

Appendix E - Emergency Action and Contingency Plan Verification

I _____ have read Nanogate North America LLC. Emergency Action and Contingency Plan. Today's Date: _____ . If you have any questions or comments about the plans, please contact our Environmental Health and Safety Department.