



DANSKAMMER ENERGY CENTER

Case No. 18-F-0325

1001.18 Exhibit 18

Safety and Security

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Exhibit 18: Safety and Security

18(a) Preliminary Plan for Site Security during Construction of the Facility

Security risks are anticipated to be minimal during both construction and operation of the Project due to the limited area of construction and the existing security system. Danskammer has attached a Site Security Plan for the Project, which is included in this Application as Appendix 18-1. This plan details the information in the following subsections in regard to site security for both the existing Danskammer Generating Station and access to the property during construction of the Project.

(1) Access Controls

The existing Danskammer Generating Station Site is surrounded by security fencing with barbed wire, as shown on sheet C3-01-05 (Fencing Plan) of Appendix 11-1. Access to the Site by vehicles is limited to a single gated roadway, which is always manned by a security guard. See Appendix 18-1 for details of access controls to the Project Site.

(2) Electronic Security and Surveillance Facilities

Electronic security and surveillance security systems are already in place for the operation of the existing Danskammer Generating Station. Security cameras, including installation of remote cameras to monitor for trespassing, and lighting will be expanded, as necessary, to provide security and surveillance to the proposed Project, which will include surveillance during construction of the Project.

(3) Security Lighting

Exterior lighting during construction and operation will be strategically placed throughout the Site to emphasize and highlight perimeters, entry points into existing buildings, and vehicle gate openings. Danskammer will also avoid light pollution. If lighting is situated near the single occupied residential property that is in close proximity (1,000 feet) to the Project Site, motion sensors may be used to control the light fixture where Danskammer deems necessary. If construction activities must take place at night, Danskammer will also use portable lights to illuminate the work area. These lights are typically are powered by portable generators and they only run and lit while construction crews are working. See Exhibit 11 and Appendix 11-1 for details on the proposed lighting plan. Refer to Appendix 18-1, Site Security Plan, for additional details.

(4) Setback Considerations

All construction will take place on private property owned by Danskammer, and the public does not have access to the Project Site and therefore, will be safe from risks that Project components may pose. Refer to Appendix 18-1, Site Security Plan, for details. Also, during construction, temporary hazardous substance and fuel oil storage areas will be located with adequate setbacks and consideration of the safety of both on-site personnel and the general public, as discussed in detail in Exhibit 15.

18(b) Preliminary Plan for Site Security during Operation of the Facility

As detailed above, Danskammer has attached a Site Security Plan for the Project as Appendix 18-1. This plan details the information in the following subsections in regard to site security during the operational life of the Project.

(1) Access Controls

As discussed above, the existing Danskammer Generating Station Site is surrounded by security fencing, as shown on sheet C3-01-05 (Fencing Plan) of Appendix 11-1.. Access to the Site by vehicles is limited to a single gated roadway, which is always manned by a security guard. Employees and visitors to the existing Site are required to sign in, and records are kept of persons who enter and exit the Project Site. Refer to Appendix 18-1 for details on access controls to the Project Site during Project operation.

(2) Electronic Security and Surveillance Facilities

As discussed previously, electronic security and surveillance and security systems are already in place for the existing Danskammer Generating Station Site. Security cameras and lighting will be expanded to provide security and surveillance for the proposed Project. Systems already in place, along with system expansions, will be appropriate to ensure monitoring and surveillance of the Project during operation.

(3) Security Lighting

As discussed above, exterior lighting is already in place at the existing Danskammer Generating Station and will continue to be used for existing and proposed Project facilities. Exterior lighting is strategically placed throughout the existing Site to emphasize and highlight perimeters, gates, entry points into buildings, and the vehicle gate opening, and will be extended similarly for the proposed Project. Temporary and permanent light levels measured at property lines adjacent to

a residential property or public right-of-way will ensure the prevention of unnecessary light trespass beyond the Project property line.

Exterior lighting serves as a deterrent, as well as to aid in monitoring the perimeter of the Project. Security lighting will be used at the minimum levels needed to accomplish the purpose and will not be used when unnecessary. This will minimize visual disturbances while providing adequate security for the Project. See Exhibit 11 and Appendix 11-1 for details on the proposed lighting plan.

(4) Lighting of Facility Components to Ensure Aircraft Safety

Exhaust stacks already in place at the existing Danskammer Generating Station Site are currently lighted. A Federal Aviation Administration (FAA) Aeronautical Study determination was received for the Project on October 10, 2019 and determined that the proposed stack is not a hazard to air navigation and does not exceed obstruction standards (Appendix 25-6). Chapter 13 of the FAA's December 4, 2015 Advisory Circular 70/7460-1L outlines marking and lighting requirements for chimneys, flare stacks, and similar solid structures. The FAA also determined that marking and lighting of the proposed stack will not be necessary for aviation and aircraft safety.

(5) Setback Considerations

In accordance with good engineering practices, Project components that may present hazards to public safety will be designed with adequate setbacks from Project property boundaries. As part of the design process, off-site consequence analyses have been conducted, verifying that equipment and storage areas are located with sufficient setbacks to mitigate potential hazards/impacts to public safety. The Project is located in an industrial area and is not readily accessible to the general public. Refer to Appendix 18-1 and Table 31-3 for details on Project component setbacks.

(6) Cyber Security Program

With regards to cybersecurity of the Project's digital networks and communication systems, Danskammer will continue to comply with the North American Electric Corporations (NERC's) Critical Infrastructure Protection (CIP) standards. With regards to cybersecurity of the Project's digital networks and communication systems, Danskammer will continue to comply with the North American Electric Corporations (NERC's) Critical Infrastructure Protection (CIP) standards. The existing Cyber Security Program has been built and maintained to comply with NERC requirements for CIP. Per these requirements, Danskammer will continue to maintain firewalls

that will control and monitor inbound and outbound communications traffic. The review process includes oversight and implementation by the site team, periodic review by corporate level CIP compliance expertise, including annual audits or reviews, followed by the periodic reviews and / or information requests from NERC and NPCC, in order to confirm that the plan and execution remains current and in accordance with NERC and NPCC expectations.

18(c) Safety Response Plan

Danskammer has included the preliminary Safety Response Plan for the Project as Appendix 18-2. Key elements of this plan include the following.

(1) Contingencies that Would Constitute a Safety or Security Emergency for the local community

Below is a list of contingencies that could constitute a safety or security emergency:

- Natural emergency, severe weather;
- Fire;
- Physical threat, terrorism, intrusion, vandalism, security breach, or other similar security events at an electric generation facility;
- Cyber security;
- Environmental accident, spill; and/or
- Injuries and serious health conditions.

(2) Local Emergency Response Organization Training

Information and training will be provided to local emergency response organizations, including the Middlehope Fire Department, to provide instruction on how to respond to emergencies that occur on or near Project components. Danskammer will work with the emergency response organizations listed above, as well as county and state safety officials, as appropriate, to provide annual trainings to emergency response leadership and their assigned staff.

(3) Safety Drill Protocols and Procedures by Contingency

The Safety Response Plan provided in Appendix 18-2 includes information regarding specific safety drill protocols and procedures to be followed in order to respond to emergency situations. Each contingency category addressed in Section 18(c)(3) are represented in the Safety Response Plan, and respective safety drills and procedures are listed.

(4) Emergency Response Measures by Contingency

Below are brief descriptions of emergency response measures by each contingency category listed in Section 18(c)(1) above. The Safety Response Plan found in Appendix 18-2 in this Application describes the emergency response actions for each contingency in much greater detail. Below are general emergencies response measures that apply to these contingencies.

- It is the responsibility of the Site Leader to assess a developing emergency situation and initiate the appropriate actions in the Safety Response Plan to protect personnel, the surrounding environment, and Project equipment from adverse damages.
- In the event of an emergency where personnel should be protected, the Site leader will call 911 immediately, then contact Danskammer Operations Center Control Room (845-563-9118 x 2558).
- Based upon the type and extent of the emergency, the Site Leader should assess whether an evacuation should be initiated.
- If the Site Leader determines that a facility evacuation is necessary, he/she must determine which type of evacuation to direct (immediate or delayed).
- If the Site Leader determines that an evacuation is necessary, he/she shall ensure that a sounding of the Project alarm is initiated.

Natural Emergency, Severe Weather

Natural emergencies and severe weather events include, among other things, tornadoes, flooding, hurricanes, blizzards, high wind conditions, earthquakes, and severe thunderstorms. In addition to the general emergency response measures listed above, contingency specific measures include:

- The Site Leader at the Project should monitor weather-related emergencies. Information and warnings are available via local radio, television, and internet weather and news sites.
- When information is received that a severe weather watch or warning has been issued, the Site Leader should notify their Manager and site employees.
- The Manager will determine whether or not the Site should be shut down due to the weather situation. When severe weather is forecasted such as high winds associated with a hurricane, or other related conditions such as floods and/or storm surge, considerations for equipment shutdown should be taken consistent with the Site's operating practices that ensure safety considerations first.

- Site personnel should seek indoor shelter in the plant in a designated secure location or other reinforced structure. Personnel should remain indoors if the severe weather is affecting the immediate area around the facility.
- The following list represents actions that should be taken at the Site for it to be secured. The listing is not intended to be all inclusive and will vary in applicability pending advance warning of the onset of the event.
 - Ensure Site personnel are safe and accounted for.
 - Seek safe shelter. If personnel are using a vehicle during winter, ensure a survival kit and sufficient gas are in place.
 - Ensure portable equipment, trash cans, tools, etc. are stored indoors.
 - Ensure that building doors are closed and latched.
- Sound the plant alarm system if a tornado or other similar severe weather warning is issued.

Fire

Potential sources of fire related to the construction and/or operation of the Project include electrical shorts and malfunctions, vehicle exhaust systems, welding and cutting, fueling, and improper flammable liquid storage. Potential causes of fire not associated with construction and/or operation activities could include controlled burning activities, other structure fires, arson, and smoking. A best practice to prevent fires is to maintain excellent housekeeping. Any accumulation of combustible material should be reported during the daily meeting or the monthly Site inspection. In addition to the general emergency response measures listed above, contingency specific measures include:

- Any on-site personnel who discover a fire in the facility should immediately make radio contact with the Danskammer Operations Center Control Room (845-563-9118 x 2558),, and provide the following information: a) that a fire has been discovered, b) the location and source of the fire, c) any injuries that have occurred, d) the cause of the fire (if known), e) actions they will be taking to extinguish the fire (if appropriate), and f) request activation of the fire alarm system.
- Any person discovering a fire in its incipient stage should act as quickly as possible to extinguish the fire. In general, a fire should be considered to be in its incipient stage if it meets two primary criteria: a) the fire can be extinguished or controlled with a single

portable fire extinguisher, and b) the person discovering the fire perceives an adequate level of safety in attempting to extinguish the fire.

- As long as the fire is in its incipient stage, as defined above, the person discovering the fire should use the appropriate and readily available fire extinguishing equipment to extinguish the fire. Fire-fighting efforts that are beyond the incipient stage will be performed by trained outside responders only.
- Plant personnel will be provided with initial and periodic refresher training on the types and locations of fire-fighting equipment at the facility.
- The Fire Extinguisher Deployment Plot, detailing the location of portable fire-extinguishing equipment deployed at the facility, is provided in the Emergency Action Plan. Additionally, the Fire Protection System Plot details locations of key fire hydrants near or on the facility.
- In response to the fire, the Site Leader will need to determine if equipment needs to be shut down and activity ceased.
- Contact local emergency response services and provide the following information: a) type of emergency, b) magnitude and location, c) any immediate danger to people on or off site, d) any known injuries, and e) any other pertinent information.
- Site personnel shall escort emergency services to the location of the fire. Site personnel may also be called to provide emergency services with specific information about the dangers of plant equipment, chemicals nearby, electrical sources, fuel storage and supply, etc.

Physical Security

Physical security incidents can include intrusion, bomb threats, sabotage, vandalism, terrorism, or other similar security events at an electrical generation facility. If a hostile intruder enters the Site, each person shall quickly determine the most reasonable way to protect their own life. Visitors and contractors are likely to follow the lead of employees and managers during a hostile intruder situation. In addition to the general emergency response measures, each person shall take the following actions, accordingly:

- Evacuate,
- Hide Out,
- Take Action (as a last resort and only when lives are in imminent danger), and
- Call 911 when it is safe to do so.

In the event that the Site receives threatening correspondence either by phone or other means of communications, the following actions should be performed immediately:

- Gather as much information as possible from the person making the threat.
- If the threat is via written correspondence, place the correspondence in a location in which it will not be touched or otherwise disturbed until police can be contacted.
- If the threat is being made verbally (phone or other), communicate and obtain information from the individual making the threat for as long as possible. For phone threats, note the time of the call, do not interrupt the caller and describe the tone of voice as well as any background sounds.

After information on the threat is gathered, inform the Site Leader, contact Security Operations at 845-563-9118 x 2558, contact local law enforcement, as applicable (e.g., 911), then communicate the Physical Security Event to on-site personnel.

Cyber Security

Site personnel may become aware of a cyber incident or the potential for a cyber incident from a variety of sources, including email alerts, an employee, a regulatory agency, a business partner, or an outside source. In addition to the general emergency response measures, once a cyber security threat is verified, emergency response measures include:

- The Site Leader makes the unit safe or stabilizes the unit as needed, plans the recovery if appropriate.
- The Site Leader communicates to the following parties:
 - Immediate Supervisor;
 - Corporate Security;
 - Local Emergency Services, if appropriate; and
 - Transmission System Operator, if appropriate.
- The team restores the cyber assets affected by the incident to normal operations. This may require reloading data from backup tapes or reinstalling cyber assets from their original distribution media.
- Once the affected cyber assets have been restored, they are tested to make sure they are no longer susceptible to the vulnerability that caused the incident.
- The impacted system(s) is (are) tested to ensure it (they) will function correctly when placed back in production.

Environmental Accident, Spill

The spill or release of any chemical/oil or Heat Transfer Fluid (HTF) is a potentially serious event, and appropriate response actions must be taken to minimize health hazards to personnel, as well as potential impacts to the environment. Danskammer's policy is that plant personnel will not respond to spills/releases but will instead call for trained outside responders to perform this function. In addition to the general emergency response measures, the basic actions to be taken in response to a chemical or oil/HTF spill or release are the following:

- If the spill or release is the direct result of an operational action performed on the system from which the release has originated, the person who performed the action should attempt to stop the release (if possible) if it can be stopped without incurring additional personal exposure to the substance.
- The person discovering a spill/release should immediately move to a location that is a safe distance from the affected area and, if safe to do so under prevailing conditions, remain within an observational distance.
- The person discovering the spill should look for other personnel in the area and warn them by any means available of the event that has occurred. The Site Leader should be notified immediately over the radio. Information provided should include the following known information: a) what type of chemical has been spilled/released, b) the location(s) of the spill/release, c) if the source of the spill/release has been stopped, d) if any injuries or chemical exposure has occurred to personnel, e) boundaries describing the area of the spill, f) whether or not the spill is contained, g) quantity released (if it can be estimated), and h) environmental impacts (water bodies, streams, ground, roadways).
- Based upon the report from the person discovering the spill, the Site Leader shall evaluate whether the circumstances pose a threat to the surrounding community or the environment. If a threat is imposed to the community or environment, 911 should be notified immediately. The Site Leader shall also contact at least one of the following specialized emergency responders:

Table 18-1. Emergency Responder Contact Information

Organization	Expected Response Time	Contact Number
National Response Center	2 to 4 Hours	1-800-424-8802
New York State Spill Hotline	Up to 2 Hours	1-800-457-7362
New York State Department of Environmental Conservation Region 3	2 to 4 Hours	845-256-3000
New York State Emergency Response Commission	2 to 4 hours	518-292-2366
United States Environmental Protection Agency Region 2	2 to 4 hours	1-877-251-4575
Safety Kleen	2 to 4 Hours	1-888-375-5336

- While remaining at a safe distance from the spill/release, the person discovering the spill should locate and place temporary containment around the outer boundaries of the spill, and place absorbent mats over drains near the location of the spill.
- The person discovering the spill should attempt to barricade, restrict access, or otherwise mark off safe boundaries around the spill to prevent others from inadvertently approaching the spill area.
- Once the Site Leader has determined that adequate containment and barricading of the spill area exists, they shall ensure that an adequately trained observer remains positioned a safe distance from the scene to observe the status of the spill and arrange for proper cleanup/mitigation actions.

Injuries/Serious Health Conditions

Project personnel should take the most aggressive response actions that are prudent in an emergency situation; the first and foremost action is to call 911 to initiate the response of trained outside medical responders. Outside medical responders will not be asked to enter the facility, with the exception of the facility’s Operations and Maintenance Building. It will be the responsibility of facility personnel to undertake high-angle rescues at the facility up to a ground-level location where outside medical responders can safely respond to the injured person.

To prepare Project personnel for such contingencies, it is Danskammer’s policy that operating personnel and as many other personnel as possible should be trained in Cardiopulmonary

Resuscitation (CPR), blood-borne pathogens, and in the use of an Automated External Defibrillator (AED).

The Site will maintain at least one well-stocked first aid kit at the control room or Operations and Maintenance building and one in each Site vehicle, as well as various additional locations including but not limited to machine shops, the lunch room, warehouse, HRSG, ACC, and the security entrance. These kits will be inspected at least monthly. Basic guidelines for response actions to be taken in the event of personnel health can be found in the Safety Response Plan. The plant will determine the locations of the nearest non-emergency Worker's Compensation approved medical facility and post the name, address, and phone number. In the event of an emergency, the 911 responders will determine the best location for emergency care.

An AED will be maintained at the Site at a designated location known and accessible to staff. The AED will be tested regularly, and employees will receive annual training on its use.

Below are basic first response actions for injuries and health issues, as listed on the American Red Cross website. More details and additional instructions for specific contingencies are contained in the Preliminary Safety Response Plan.

- Check for responsiveness. Responsiveness is when the person is able to respond when the responder calls their name or touches them.
- If the person is unresponsive, the responder should immediately call 911 for outside medical assistance and ask other personnel to bring the AED (if present) to the scene.
- Check to see if the victim is breathing normally.
- If no signs of breathing are observed, the responder should check for visible signs of airway blockage.
 - If obvious signs of airway blockage are noticed, the responder should attempt to remove the blockage.
- If no signs of breathing continue, the responder (or other trained personnel) should commence CPR.
- If CPR is being performed and the AED arrives to the scene, direct an assistant to begin setting up the AED for operation on the victim.

- CPR should be continued during the time that the AED is being set up.
- If the AED is placed into operation, remain near the victim, and follow AED instructions to ensure safety and proper victim monitoring. Maintain the victim with AED monitoring until trained medical responders arrive at the scene.
- If the victim has obvious broken bones, is bleeding profusely, or may have neck or spine injuries, the responder should not attempt to move the victim unless their immediate safety would be jeopardized by leaving them in that particular location. The responder should make the victim as comfortable as possible and apply pressure to mitigate areas of bleeding until trained medical personnel arrive at the scene.
- The responder should immobilize injured parts of the victim.
- The responder should prepare the victim for transportation if the victim can be safely moved.

(5) Evacuation Control Measures by Contingency

Danskammer has two designated evacuation control measures, immediate and delayed, that apply to the contingencies. Below are summaries of the measures and more details including egress routes and muster areas that are detailed in the Safety Response Plan.

Immediate Site Evacuation Procedure

- The Site Leader should locate and obtain the visitor/contractor sign-in sheet.
- The Site Leader should locate and obtain immediately accessible hand-held radios.
- The Site Leader should determine the safest muster area to proceed to, depending upon the known circumstances of the emergency. The Project will have an identified off-site muster area as the default in this situation.
- The Site Leader should assign designated plant employees to assist employees, visitors, or contractors with special needs that would restrict their ability to get safely and expediently to the muster area.
- The Site Leader should pass the following information over the plant radio system:
 - The muster area where employees will be proceeding to.
 - Visitors/contractors known to be in the operating areas (as indicated by the visitor/contractor sign-in sheet).

- Once emergency personnel have completed the preceding steps, they shall immediately proceed to their designated muster area.
- Upon arriving at the designated muster area(s), the group shall designate a Person-in-Charge to take a head count of personnel who are at the muster area, including contractors and visitors.
- Personnel at the muster location shall remain there until an “ALL CLEAR” signal is sounded, or if directed by the Site Leader or the Emergency Coordinator (if applicable) to leave the muster location.

Delayed Site Evacuation Procedure

- The Site Leader should take the necessary operating actions to place the facility in the most stable condition, based upon the type of emergency.
- The Site Leader locate and obtain the visitor/contractor sign-in sheet.
- When visitors, contractors and non-essential operating personnel have been accounted for, the Site Leader shall designate a trained person to escort non-essential personnel to the Operations and Administrative Building or designated muster area along the safest egress route.
- The Site Leader should notify the Operations Center of the current facility status and evacuation details.
- If necessary, the Site Leader should perform a controlled shutdown in accordance with appropriate procedures and directions.
- Once the shutdown has been completed, essential personnel shall gather in the Operations and Administrative Building or designated muster area and take roll call.
- When essential operating personnel are present and accounted for, evacuation to the designated muster area shall be performed, unless the egress route is not safe for travel.

(6) Community Notification Procedures by Contingency

Community notification in the event of any emergency begins by calling 911 and contacting local emergency responders. If necessary, the Site Leader will contact local governmental agencies, local utility providers, and/or other community stakeholders that may be impacted by an emergency. Additionally, if necessary, a Project representative will contact adjacent landowners

directly by telephone and/or by personal visit. Emergency notification is the same for all contingencies. All stakeholders to be contacted are included in the stakeholder list (see Appendix 2-2), once the emergency situation is responded in accordance with the protocols set forward in the Safety Response Plan, and there is no longer imminent threat to the Project, the surrounding community or the environment.

The Safety Response Plan and the Site Security Plan for the Project will be shared with the local emergency response teams. Local emergency response teams will be given an opportunity to review these plans, ask questions, and provide suggestions. Danskammer understands the importance of coordination with local fire, police, and other emergency services. Danskammer will work to ensure local emergency response teams are kept updated on the status of the Project and are made aware of potential safety and security emergencies. Preliminary introductions and discussions have been conducted with local fire and police as described in the PIP meeting log and additional discussions will occur prior to construction and the start of operations.

(7) Safety Response Plan Provision and Review Request by Local Emergency First Responders

The Danskammer Energy Center has provided a copy of the preliminary Safety Response Plan to the Middlehope Fire Department, local emergency responders, Orange County Emergency Management Office, and the Town of Newburgh Police Department and requested that they review the plans. First responders will also be given an opportunity to provide comments and ask questions. Danskammer will review responses received from local emergency first responders and adjust the plans if warranted.

18(d) Provision and Review of Preliminary Site Security and Safety Response Plans by the New York State Division of Homeland Security and Emergency Services

Danskammer has provided a copy of the plans required in Sections 18(a), 18(b), and 18(c) of this Exhibit to the New York State Division of Homeland Security and Emergency Services and has requested they review and comment on the Safety Response Plan. Danskammer will review responses received from the Division of Homeland Security and Emergency Services and adjust the plans, if warranted.

18(e) On-Site Equipment and Systems to Prevent or Handle Fire Emergencies and Hazardous Substance Incidents

On-site equipment and systems to prevent or handle fire emergencies and hazardous substance incidents include the following located at pre-determined areas across the Project Site:

- Wall mounted fire extinguisher;
- Spill containment units;
- Emergency eye wash stations;
- Wall-mounted first aid kits;
- Portable first aid kits and eyewash bottles;
- Portable fire extinguishers;
- Safety vests;
- Safety masks, gloves, and goggles;
- AEDs; and
- Backboard pallets.

18(f) Contingency Plans to be Implemented in Response to the Occurrence of a Fire Emergency or a Hazardous Substance Incident

Emergency response action plans for a fire emergency and for a hazardous substance incident/spill are summarized in Section 18(c)(4) above and are explained in detail in the Safety Response Plan.

In addition, a Spill Prevention, Control, and Countermeasure (SPCC) Plan (see Appendix 23-5) has been prepared and will be implemented for both the construction and operation phases of the Project. The SPCC Plan assesses potential hazardous substances that could be used during the construction, operation, or maintenance of the Project. The SPCC Plan includes protocols to be followed in the event of minor and major hazardous substance discharge events, as well as a Project-wide inventory of spill response equipment. The majority of potentially hazardous substances on Site consist of various oils such as hydraulic oil, mineral oil, and lubricating oil. The handling of these potentially hazardous substances has been discussed in detail in Exhibit 12 of the Application.

18(g) Safety Response Plan Provision and Review

Danskammer has met with local emergency services providers to inform them of the potential Project, seek input, and answer questions. Danskammer met with the Orange County Sheriff's Department and Orange County Office of Emergency Services in October of 2018 and with the Middlehope Fire Department in April of 2019 to discuss the Project. Danskammer has provided a copy of the plans required in Section 18(c) of this Exhibit to the local emergency first responders serving the area of the Project and request that they review the plans and will give them an

opportunity to provide comments and ask questions. Danskammer will review responses received from local emergency first responders and adjust the plans if warranted and provide a copy of the final plan to local emergency responders, adjacent landowners, utility providers to the Project Site, the county emergency management office, and the New York State Division of Homeland Security and Emergency Services. The Safety Response Plan has also been made available on the Project's website.

References

American Red Cross. 2019. CPR Steps. Available online at: <https://www.redcross.org/take-a-class/cpr/performing-cpr/cpr-steps>. Accessed July 2019.

APPENDIX 18-1

SITE SECURITY PLAN



DANSKAMMER ENERGY CENTER

Case No. 18-F-0325

APPENDIX 18-1

Site Security Plan

Danskammer Energy Center
Town of Newburgh, Orange County, New York

FACILITY OPERATOR:
Danskammer Energy, LLC
994 River Road
Newburgh, New York 12550

November 2019

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Appendices

Appendix A. Main Gate Ingress and Egress Procedures

1.0 Purpose

The Danskammer Energy Center (Project) Site Security Plan (Plan) exists to ensure the safety and security of the Project Site and employees and personnel associated with construction and operation of the Project. The Applicant is committed to the security of the Project and is committed to upholding the security measures contained herein.

The objective of the Plan is to provide a base for security measures to be implemented throughout the Project from construction through the operational life of the Project. Security measures will be implemented by contracted construction personnel as well as employees of the existing Danskammer Generating Station and the new Danskammer Energy Center. Indicated security measures are essential to guarantee the safety of associated personnel, to prevent and minimize damage, theft, and vandalism, and to prevent unauthorized access to Project components.

2.0 Security Measures During Project Construction

2(a) Access Controls

The existing Danskammer Generating Station site is surrounded by security fencing, as shown on sheet C3-01-05 (Fencing Plan) of Appendix 11-1, Preliminary Design Drawings. The existing property gate at the Site will also enclose the Project during construction. Access to the Site by vehicles is limited to a single gated roadway. This gate is always manned by a guard and detailed ingress and egress procedures are attached as Appendix A of this Plan. The guard on duty at the main gate keeps a detailed gate log and reviews it regularly and routinely to ensure that persons who have entered the Site have also left at the end of the day, before the facility is secured after-hours. If any personnel need to be on Site after regular hours, a guard will be called to the gate to let personnel out and secure the gate accordingly. Guards are also present on-site after-hours and make regular rounds of the Project Site to ensure security and safety of the facility.

2(b) Electronic Security and Surveillance Facilities

Electronic security and surveillance security systems are already in place at the existing Danskammer Generating Station Site. Security cameras and lighting will be expanded to provide security and surveillance to the proposed Project, including providing surveillance and security of the Project during construction. The Engineering, Procurement, and Construction (EPC) Contractor selected by the Applicant will implement additional internal security procedures as appropriate, including surveillance, during construction activities.

2(c) Security Lighting

The majority of Project construction work will be conducted during daylight hours. Exterior lighting during construction will be strategically placed throughout the Site to emphasize and highlight perimeters, entry points into existing buildings, and vehicle gate openings.

Temporary light levels due to construction will not have any impact on the surrounding property. Measures will be taken to prevent unnecessary light trespass beyond the Project property line to the extent practical. Security lighting will be used at the minimum levels needed to accomplish the purpose and will not be used when unnecessary. This will minimize visual disturbances while providing adequate security for the Project. The EPC Contractor selected by the Applicant will implement security lighting in accordance with their internal security plans.

2(d) Component Setbacks

Setbacks for Project components during construction will comply with those setbacks determined for permanent Project component location. During Project construction, components will be located within the existing Danskammer property. See Exhibit 31, Local Laws and Ordinances, for details and discussion on Project component setbacks. The general public does not have access to the Project Site and therefore, will be safe from any risks that Project components may pose. High voltage equipment will be designated as such, will be handled only by trained qualified personnel, and will be locked/secured during construction. The EPC Contractor selected by the Applicant will be responsible for securing high voltage equipment.

3.0 Security Measures During Project Operation

3(a) Access Controls

As discussed above, the existing Danskammer Generating Station Site is surrounded by security fencing, as shown on sheet C3-01-05 of the Preliminary Design Drawings. Access to the Site by vehicles is limited to a single gated roadway, which is always manned by a security guard. Employees and visitors to the existing Site are required to sign in, and records are kept of persons who enter and exit the facility. The same policies and structures in place for gate security detailed in Section 2(a) of this plan apply to access control of the Project during its operational life.

3(b) Electronic Security and Surveillance Facilities

As discussed above, electronic security and surveillance security systems are already in place for the existing Danskammer Generating Station Site. Security cameras will be expanded to

provide security and surveillance for the Project. Systems already in place, along with system expansions, will be appropriate to ensure monitoring and surveillance of the Project during operation.

3(c) Security Lighting

The Project's lighting system will provide illumination during normal plant operations and emergency situations in the case of a power outage. As discussed above, exterior lighting is already in place at the existing Danskammer Generating Station and will continue to be used as necessary for existing and proposed Project facilities. Exterior lighting is strategically placed throughout the existing Site to emphasize and highlight perimeters, gates, entry points into buildings, and vehicle gate openings, and will be extended similarly for the proposed Project. Temporary and permanent light levels measured at property lines adjacent to a residential property or public right-of-way will ensure the prevention of unnecessary light trespass beyond the Project property line.

Exterior lighting serves as a deterrent, as well as aids in monitoring the perimeter of the Project. Security lighting will be used at the minimum levels needed to accomplish the purpose and will not be used when unnecessary. This will minimize visual disturbances while providing adequate security for the Project. New lighting will be installed facing downward and inward to minimize potential impacts to the surrounding public. See Exhibit 11, Preliminary Design Drawings, and Appendix 11-1 for details on the proposed lighting plan.

3(d) Component Setbacks

In accordance with good engineering practices, Project components that may present hazards to public safety have been designed with adequate setbacks from Project property boundaries. As part of the design process, off-Site consequence analyses have been conducted, verifying that equipment and storage areas are located with sufficient setbacks to mitigate potential hazards/impacts to public safety. The selected setback distances were determined to ensure the health and safety of area residents. The general public does not have access to the Project Site and therefore, will be safe from any risks that Project components may pose.

All permanent Project components will be set back at specific distances from property lines in order to ensure public safety. During Project operation, components will be located within the existing Danskammer property. See Exhibit 31, Local Laws and Ordinances, for details and

discussion on Project component setbacks. Any high voltage equipment will be designated as such and will not be charged until the Project is secure.

3(e) Cybersecurity

With regards to cybersecurity of the Project's digital networks and communication systems, the Applicant will continue to comply with the North American Electric Corporations (NERC's) Critical Infrastructure Program (CIP) standards. The existing Danskammer Generating Station is compliant with the necessary NERC CIP standards. The existing Cyber Security Program has been built and maintained to comply with NERC requirements for critical infrastructure protection (CIP). Per these requirements, Danskammer will continue to maintain firewalls that will control and monitor inbound and outbound communications traffic. The review process includes oversight and implementation by the site team, periodic review by corporate level CIP compliance expertise, including annual audits or reviews, followed by the periodic reviews and / or information requests from NERC and NPCC, in order to confirm that the plan and execution remains current and in accordance with NERC and NPCC expectations.

APPENDIX A

Gate Security Procedures and Example Forms

Operations procedure S3

Revision No. 0

Date: 1/20/2016

1.0 SCOPE

To provide an accurate and efficient method for security personal to track who is on site at all times. As well as a method for the control room to stay in contact with security during off hours when the guards are away from the gate making their rounds about the site.

2.0 PURPOSE

To keep an accurate count of all people on site at all times

3.0 DEFINITIONS

3.1 RESPONSIBILITY

Senior management has the responsibility to ensure the safety of Danskammer employees and facilities.

Supervision

The Crew Leaders are responsible for ensuring compliance with the tasks outlined in this procedure. Ensure that employees recognize their personal responsibility to work safely.

3.3 Safety Representative

The safety representative has the responsibility to review procedures to ensure that they are in compliance with all applicable regulatory requirements and consistency with Danskammer health and safety policies and operating procedures.

3.4 Employee

Employees shall comply with all of the safety requirements and work practices of this procedure. Employees are to use the appropriate safety devices and apparel for tasks performed. They report concerns, injuries, safety equipment problems and incidents immediately to their Crew Leader when they are identified.

4.0 PROCEDURE

4.1 The gate is to be closed at all times. It should only be open to let vehicles in or out, or for maintenance.

Operations procedure S3

Revision No. 0

Date: 1/20/2016

- 4.2 Everyone has to be signed in and signed out. For safety and security reasons we need to know who is on the property at all times.
- 4.3 If the guard is busy at one gate they are not to open the other gate until they can log the time and name of the person or persons passing through the gate.
- 4.4 Each day at 0700 and 1900 the guard on duty will review the gate log from the previous Danskammer shift and confirm that everyone from the previous shift has left the property.
 - 4.4.1 If the guards find a name on the list that has not been signed out from the previous shift, they are to call the control room and confirm that the person in question has left for the day or is still on-site.
 - 4.4.2 If operations do not know the location of the person in question they are to check the site for the person or the vehicle of the person in question. Then to report back to the guard on duty.
 - 4.4.3 The guards will document who they spoke with and the time they called.
- 4.5 The guard on duty will carry the company cell phone and portable radio (set to channel 1) at all times. Between the hours of 1900 – 0700 Monday – Friday and on all shifts Saturday & Sunday the guards are to patrol the site at least once every hour. They are to call and check-in with the control room every 2hrs to confirm that everything is ok at the plant and the guard on duty is ok.
- 4.6 If an employee is coming to work at a time that is outside the normal shift starting times (0700 or 1900) the guards are to be notified in advance so they can plan to be at the gate at the appropriate time.
 - 4.6.1 If the guard is not at the gate when a person is trying to get on-site that person can call the guards cell phone (845-264-2601) or the control room (845-563-9117) and the operators can call the guard on the radio. Both phone numbers are posted on the entrance gate.
 - 4.6.2 If an employee is leaving Danskammer at a time that is outside the normal shift change times (0700 or 1900) the guards are to be notified in advance so they can plan to be at the gate at the appropriate time.

APPENDIX 18-2

SAFETY RESPONSE PLAN



DANSKAMMER ENERGY CENTER

Case No. 18-F-0325

Preliminary Safety Response Plan

November 2019

NAME OF FACILITY: Danskammer Energy Center

TYPE OF FACILITY: Electric Generating Facility

LOCATION OF FACILITY: 994 River Road, Newburgh, NY 12550

NAME AND ADDRESS OF OPERATOR:

Danskammer Energy, LLC

994 River Road

Newburgh, NY 12550

DESIGNATED PERSON ACCOUNTABLE FOR OIL, HAZARDOUS, AND NON-HAZARDOUS MATERIAL SPILL PREVENTION AT FACILITY:

Name: Susanne May

Title: EHS Specialist

DESIGNATED PERSON ACCOUNTABLE FOR FIRE PREVENTION AND OTHER EMERGENCY PROCESSES INCLUDING PLANT EVACUATION:

Name: Ed Hall

Title: Plant Manger

Signatures:

Ed Hall, Plant Manager _____ Date: _____

John McGahan, Operations Manager _____ Date: _____

Susanne May, EHS Specialist _____ Date: _____

Emergency Spill Contacts

Qualified Individuals	Response Time	Contact Numbers
Susanne May, EHS Specialist	1 hour	Cell: 845-416-4463 Office: 845-563-9117
John McGahan, Operations Supervisor	1 hour	Office: 845-563-9114 Cell: 845-527-3542

Other Emergency Internal Contacts

Positions	Name	Contact Numbers
Plant Manager	Ed Hall	Office: 845-563-9110 Cell: 845-275-9137
Maintenance Supervisor	John Gaffney	Office: 845-563-9111 Cell: 845-219-3357
Yard Supervisor	Buzz Smith	Office: 845-563-9116 Cell: 845-264-3863
Crew Leader		Internal: 4830 Outside: 845-563-9119

Emergency Telephone Numbers

Danskammer: (Immediate Contacts)

Regulatory Agencies:

New York State Department of Environmental Conservation: 800-457-7362

U.S. Coast Guard National Response Center: 800-424-8802

U.S. Coast Guard Captain of the Port: 718-354-4136

Oil and Hazardous Material Spill Response Contractors:

Miller Environmental Group: 845-569-1200

IRA D. Conklin: 845-561-1512

Local Agencies:

Police: 911

Fire: 911

Ambulance 911

Hospital, St. Lukes 845-561-4400

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1.0 Fire Prevention Plan Purpose

This Fire Prevention Plan (FPP) is in place to control and reduce the possibility of fire and to specify the type of equipment to use in case of fire. This plan addresses the following issues:

- Major workplace fire hazards and their proper handling and storage procedures.
- Potential ignition sources for fire and their control procedures.
- The type of fire protection equipment or systems.
- Regular job titles of personnel responsible for maintenance of equipment and systems installed.

The FPP is part of the Safety Response Plan (SRP). The SRP is where procedures for emergency exit can be found as well as an accounting of all employees after an evacuation, rescue and medical duties.

The Operations Supervisor is the Plan Coordinator for the FPP and has responsibility for this plan. The written plan is kept in the Control Room. The Operations Supervisor will review and update the plan at least annually or as necessary. Copies of this plan may be obtained from the Operations Supervisor.

2.0 Plan Coordinator Responsibilities

The Operations Supervisor, along with the EHS Specialist, is responsible for the following activities:

- Develop a written FPP for regular and after hours work conditions.
- Integrate the FPP with the existing Emergency Action Plan.
- Discuss procedures for reporting a fire, the location of fire exits, fire extinguishers and evacuation routes to each employee.
- Conduct evacuation drills.
- Satisfy all local fire codes and regulations as specified.
- Verify training of employees in the use of fire extinguishers and the application of medical first aid techniques.

- Keep key management personnel contact phone numbers readily available.
- Decide whether to evacuate or shelter in place during a fire.
- Verify that fire prevention and extinguishing equipment is in place and inspected.

3.0 Fire Hazards

Fire prevention measures have been developed to prevent fires, by removing the ignition source, fuel and/or oxygen. These include:

- Monthly housekeeping inspections
- Monitoring and controlling the fuel
 - Natural gas
 - Gasoline and diesel fuel
 - Oils
 - Solvents

Note: Locations and storage of fuels are identified in the SPCC Plan.

Location of Utility Shutoffs

- **Natural Gas**
 - Facility specific to be determined
 - Main Shutoff: Gas Substation West Side of Railroad Tracks
- **Electrical**
 - Main Shutoff: ST-2 Breaker, Located in Switchyard
- **Domestic Water**
 - To be determined

Potential Ignition Sources

Flammable or combustible materials and other fuel sources may not ignite on their own without an external source of ignition. The following procedures are used to control known ignition sources:

- Gas leaks and improperly stored fuel will be reported to the Crew Leader immediately after they are identified or suspected.

Fire Protection Equipment

Fire protection equipment is purchased by the Operations Department. Fire extinguishers and a fire suppression system are in use at this facility, including :

- ABC Fire extinguishers placed throughout the building.
- Fire sprinkler system

Maintenance of Fire Protection Equipment

Fire Protection equipment is inspected on a regular basis as follows:

- Fire extinguishers are inspected monthly using the Tiscor System.
- Fire sprinkler system inspections follow NFPA guidelines inspected by a licensed fire inspection company.

Housekeeping Procedures

Facility employees control accumulations of flammable and combustible waste materials and residues so they do not contribute to a fire.

4.0 Training

Emergency Response Training

The EHS Specialist will arrange for training in fire prevention and the use of fire extinguishers.

The training shall include:

- Actions when discovering a fire
- Recognizing exits and evacuation routes
- Containing a fire
- Head count procedure
- Return to the building after "all clear" signal
- Emergency shutdown procedures
- Employee responsibilities

Fire Protection Equipment

Training is provided to employees that are required to use fire protection equipment. Training includes:

- Types of fires
- Types of equipment
- Location of equipment
- Use of equipment
- Limitations of the equipment
- Proper care and maintenance of assigned equipment.
- Demonstration of the use of equipment

5.0 General Procedures for an Emergency

The person discovering the emergency must immediately contact the Control Room. When the Control Room has been contacted, state the following:

- Who you are
- Where you are
- What the emergency is
- What action is being taken
- If anyone is injured or needs medical attention
- If outside response is needed

DO NOT HANG UP UNTIL THE CONTROL ROOM OPERATOR HANGS UP.

Upon receiving the call, the Control Room Operator will dispatch the necessary help to the location of the emergency and notify the appropriate personnel. If necessary, the Control Room Operator will sound the emergency alarm for ten seconds and then announce the location and type of emergency.

There is a pre-recorded emergency announcement. The Control Room Operator can announce the emergency after the pre-recorded message .

- The emergency alarm will be sounded again, and the message will repeat several times. When the emergency is under control, the Control Room

6.0 Emergency Alarm Reporting Locations

Upon hearing the emergency alarm, all shift employees will report as follows:

Shift Employees

All Operations Personnel:

- Report to the Control Room and wait for further instructions from the Crew Leader or his designee.

Crew Leader Responsibilities

- The Crew Leader will assign an Operator to observe the fire pumps for proper operation.
- The Crew Leader will oversee the emergency crew.
- If the Crew Leader is not immediately at the scene, the senior ranking management employee at the scene will assume command and relinquish this command upon arrival of the Crew Leader.
- If the emergency is a fire, after the fire is extinguished the Crew Leader will assign at least one person to remain at the scene for a period, as required by the Hot Work Permit, to guard against re-ignition.
- The Crew Leaders will authorize the Control Room to announce " All Clear" when it is safe to re-enter the building .

All Other Employees

- Report to the Waste Water Building #1 (WW 1), located at the Northwest corner of the Facility.
- Results Supervisor will account for all personnel in WW 1 and notify the Control Room of the head count. If the Results Supervisor is not available, the Maintenance Supervisor will make the call to the Control Room.

EHS Specialist

- Walk through the office area and contractor's office to ensure everybody is evacuated.

Contractors and Visitors

- Report to the Waste Water Building #1 (WW 1), located at the Northwest corner of the Plant.
- All visitors and contractors are the responsibility of their Danskammer contact. Visitors and contractors should not leave the property until they have been accounted for by their Foreman or Danskammer contact.
- Danskammer contacts are responsible for informing their visitors and/or contractors of this procedure.

Alternate Reporting Location if access to WW 1 Building is blocked or not accessible, the alternate reporting location shall be:

- **South End of old turbine building.**

7.0 Fire

Potential sources of fire related to the construction and/or operation of the Project include electrical shorts and malfunctions, vehicle exhaust systems, welding and cutting, fueling, and improper flammable liquid storage. Potential causes of fire not associated with construction and/or operation activities could include controlled burning activities, other structure fires, arson, and smoking. A best practice to prevent fires is to maintain excellent housekeeping. Any accumulation of combustible material should be reported during the daily meeting or the monthly Site inspection. In addition to the general emergency response measures listed above, contingency specific measures include:

- Any on-Site personnel who discover a fire in the facility should immediately make radio contact with the Site control room, and provide the following information: a) that a fire has been discovered, b) the location and source of the fire, c) any injuries that have occurred, d) the cause of the fire (if known), e) actions they will be taking to extinguish the fire (if appropriate), and f) request activation of the fire alarm system.
- Any person discovering a fire in its incipient stage should act as quickly as possible to extinguish the fire. In general, a fire should be considered to be in its incipient stage if it meets two primary criteria: a) the fire can be extinguished or controlled with a single portable fire extinguisher, and b) the person discovering the fire perceives an adequate level of safety in attempting to extinguish the fire.
- As long as the fire is in its incipient stage, as defined above, the person discovering the fire should use the appropriate and readily available fire extinguishing equipment to extinguish the fire. Fire-fighting efforts that are beyond the incipient stage will be performed by trained outside responders only.
- Plant personnel will be provided with initial and periodic refresher training on the types and locations of fire-fighting equipment at the facility.
- The Fire Extinguisher Deployment Plot, detailing the location of portable fire-extinguishing equipment deployed at the facility, is provided in the Emergency Action Plan. Additionally, the Fire Protection System Plot details locations of key fire hydrants near or on the facility.
- In response to the fire, the Site Leader will need to determine if equipment needs to be shut down and activity ceased.

- Contact local emergency response services and provide the following information: a) type of emergency, b) magnitude and location, c) any immediate danger to people on or off site, d) any known injuries, and e) any other pertinent information.
- Site personnel shall escort emergency services to the location of the fire. Site personnel may also be called to provide emergency services with specific information about the dangers of plant equipment, chemicals nearby, electrical sources, fuel storage and supply, etc.

8.0 Fire Fighting Equipment Information

Class of Fires:

- A-Burning wood, paper, rags, ordinary combustibles
- B-Burning liquids including oil and gas
- C-Electrical Fire

Type of Fire Extinguishers

- A-Dry chemical, CO2
- B-Dry chemical, CO2
- C-Dry chemical, CO2

Using a Fire Extinguisher:

- Pull the pin,
- Squeeze the trigger, and
- Point the discharge at the base of the fire in a sideways sweeping motion.
- Be careful using dry chemical in a confined space. The dry chemical dust may cause discomfort if inhaled but it is not toxic.

9.0 Fire Company Assistance

If it is recognized that assistance from an outside fire company will be required, the call for assistance will be made with the approval of the Highest Ranking Danskammer personnel in the Control Room.

When the call is made, an employee will be dispatched to the Entrance Gate and will meet the fire company and direct them to the location of the fire or emergency. The guard at the Entrance Gate shall also be notified of the fire company's pending arrival.

The Crew Leader shall also designate an employee who will establish the initial contact with the person in charge of the fire fighters, to clearly identify the location of any hazards and the source of the fire in question. This employee will remain with the fire fighters as the Plant Representative until the fire is brought under control and the fire company personnel can depart.

If required, the Crew Leader will assign an employee to confirm that the appropriate sprinkler control valves are open.

10.0 Guidelines for Oil Spills/Environmental Accidents

The spill or release of any chemical/oil or Heat Transfer Fluid (HTF) is a potentially serious event, and appropriate response actions must be taken to minimize health hazards to personnel, as well as potential impacts to the environment. The Applicant's policy is that plant personnel will not respond to spills/releases but will instead call for trained outside responders to perform this function. In addition to the general emergency response measures, the basic actions to be taken in response to a chemical or oil/HTF spill or release are the following:

- If the spill or release is the direct result of an operational action performed on the system from which the release has originated, attempt to stop the release (if possible) if it can be stopped without incurring additional personal exposure to the substance.
- Immediately move to a location that is a safe distance from the affected area and, if safe to do so under prevailing conditions, remain within an observational distance.
- Look for other personnel in the area and warn them by any means available of the event that has occurred. Notify the site leader immediately over the radio. Information provided should include the following known information: a) what type of chemical has been spilled/released, b) the location(s) of the spill/release, c) if the source of the spill/release

has been stopped, d) if any injuries or chemical exposure has occurred to personnel, e) boundaries describing the area of the spill, f) whether or not the spill is contained, g) quantity released (if it can be estimated), and h) environmental impacts (water bodies, streams, ground, roadways).

- The Site Leader will evaluate whether the circumstances pose a threat to the surrounding community or the environment. If a threat is imposed to the community or environment, notify 911 immediately. The Site Leader will also contact at least one of the following specialized emergency responders:

Table 18-1. Emergency Responder Contact Information

Organization	Expected Response Time	Contact Number
National Response Center	2 to 4 Hours	1-800-424-8802
New York State Spill Hotline	Up to 2 Hours	1-800-457-7362
New York State Department of Environmental Conservation Region 3	2 to 4 Hours	845-256-3000
New York State Emergency Response Commission	2 to 4 hours	518-292-2366
United States Environmental Protection Agency Region 2	2 to 4 hours	1-877-251-4575
Safety Kleen	2 to 4 Hours	1-888-375-5336

- While remaining at a safe distance from the spill/release, locate and place temporary containment around the outer boundaries of the spill, and place absorbent mats over drains near the location of the spill.
- Attempt to barricade, restrict access, or otherwise mark off safe boundaries around the spill to prevent others from inadvertently approaching the spill area.
- Once the Site Leader has determined that adequate containment and barricading of the spill area exists, they will ensure that an adequately trained observer remains positioned a safe distance from the scene to observe the status of the spill and arrange for proper cleanup/mitigation actions.

Further spill procedures:

Spills inside the building and no fire

- Notify the Control Room.
- Try to contain the oil leak (source) from getting into floor drains or outside the building. Use speedy-dri located in the Spill Cart.
- Isolate the leak, if possible.
- Turn off Sump Pumps.
- Bermed areas should be pumped or scooped into the appropriate waste container.

Spill outside the building

- Notify the Control Room.
- Follow procedure for reporting spills.
- Isolate the leak.
- Contain the spill.
- Notify Operations for cleanup.

Reporting Oil Spills Introduction

State and federal environmental agencies have established standards for reporting and clean-up of releases of specified "hazardous materials", including oils. The term "oil and "spill" are defined very broadly in both state and federal environmental regulations. Oil is defined to include "oil of any kind and in any form, including mineral oils (dielectric fluids) as well as petroleum-based oils. Any unpermitted discharge of oil, whether intentional or unintentional, onto land or water must be considered a spill. The terms releasing, leaking, pumping, pouring, emitting, dumping, and discharging are all equivalent to spilling, for the purposes of these requirements for reporting oil spills and specifies the responsibilities of various groups and individuals within Danskammer to ensure compliance. Clean-up standards are provided in the Preliminary SPCC plan.

Any person who discovers an oil, hazardous substance or hazardous waste spill must immediately notify the persons listed below, providing their name, the type, extent and location of spill and the number and condition of those injured, if any, control measures in effect or to be put into effect and a return telephone number.

Oil and Hazardous Material Spill Report Receiving Personnel		
Crew Leader	Ext. 4830	Office: 845-563-9119
Operations Manager	Ext. 4807	Office: 845-563-9114 Cell: 845-527-3542

Spill Reporting – Internal

Danskammer oil spill report forms, found in the SPCC Plan, must be completed and routed for internal review for oil spills regardless of quantity, unless the fluid is confined to equipment surfaces and support structures. The report forms are to be completed by the EHS Specialist, based upon information supplied by the Crew Leader. Proper routing is indicated on the bottom of the form. Copies of all completed spill reports must be maintained on file in the EHS Specialist office for five years.

The following individuals must be notified within twenty-four (24) hours of any incident that requires notification of an outside agency as outlined below:

Name: Susanne May, EHS Specialist

Phone: 845-416-4463

Spill Reporting – External

Spills that can potentially harm human health or the environment must be reported to state and federal agencies. The New York State Department of Environmental Conservation (NYSDEC) and the United States Environmental Protection Agency (USEPA) have established different criteria for triggering the reporting requirements for releases.

- **NYSDEC**

The following types of releases must be reported to NYSDEC within two hours of discovery:

- Spills of any quantity of oil that may be contaminated with PCB, unless the spilled material is confined to equipment surfaces, equipment support structures or other surfaces that are readily and completely cleanable:
 - ▶ Spills of any quantity of oil directly to water;
 - ▶ Spills onto the ground of 5 gallons or more of oil;
 - ▶ Spills which involve members of the public.
- The initial report consists of a telephone call to the NYSDEC Spill Response Center providing the information outlined on the Danskammer spill report form.

The **24-hour spill hotline** is 1-800-457-7362

NYSDEC Oil and Hazardous Substance Spill Response Center
50 Wolf Road
Albany NY 12233

- **USEPA**

The following types of releases must be reported to the USEPA within twenty-four (24) hours of discovery:

- Spills of oil that contain over one (1) pound of PCB
 - ▶ One gallon of Askarel or PCB capacitor fluid containing approximately 12 pounds of PCB.

- ▶ Over 270 gallons of PCB-contaminated oil (50-500 ppm PCB) must be released to reach the 12-pound PCB reporting level. However, a spill of that magnitude should be reported even without the presence of PCB.
- Spills of any quantity of oil directly to surface water.
- Spills that harm human health or the environment.

The initial contact reporting a spill to the USEPA is:

National Response Center
U.S. Coast Guard 400 Seventh Street
Washington DC 20593

1-800-424-8802

In addition, spills involving over one pound of PCB must be reported to the USEPA Region II office, at their Environmental Center:

USEPA Region II, Edison, NJ
1-201-548-8730

The NYSDEC or USEPA may send a representative to the scene or may request additional information through follow-up phone calls or a written report. The following is the person responsible for reporting oil spills:

Name: Susanne May, EHS Specialist

Phone: 845-416-4463

11.0 Steam Leak

- Notify the Control Room.
- Extreme caution should be used when trying to locate and isolate the steam leak. Steam leaks can be heard but not seen. It cannot be stressed enough the extreme caution that must be taken in this area.
- Some steam leaks may require unit shutdown. In this case, areas should be roped off and personnel should use extreme caution until the unit can be shut down in a safe and orderly manner. It may require evacuation of non-essential personnel.

12.0 Injuries, Other Medical Emergencies and AED

Project personnel will take the most aggressive response actions that are prudent in an emergency situation; the first and foremost action is to call 911 to initiate the response of trained outside medical responders. Outside medical responders will not be asked to enter the facility, with the exception of the facility's Operations and Maintenance Building. It will be the responsibility of facility personnel to undertake high-angle rescues at the facility up to a ground-level location where outside medical responders can safely respond to the victim.

To prepare Project personnel for such contingencies, it is the Applicant's policy that operating personnel and as many other personnel as possible should be trained in Cardiopulmonary Resuscitation (CPR), blood-borne pathogens, and in the use of an Automated External Defibrillator (AED).

The Site will maintain at least one well-stocked first aid kit at the control room or Operations and Maintenance building and one in each Site vehicle, as well as various additional locations including but not limited to machine shops, the lunch room, warehouse, and the security entrance. These kits will be inspected at least monthly. Basic guidelines for response actions to be taken in the event of personnel health can be found in the Safety Response Plan. The plant will determine the locations of the nearest non-emergency Worker's Compensation approved medical facility and post the name, address, and phone number. In the event of an emergency, the 911 responders will determine the best location for emergency care.

An AED will be maintained at the Site at a designated location known and accessible to staff. The AED will be tested regularly, and employees will receive annual training on its use.

Below are basic first response actions for injuries and health issues, as listed on the American Red Cross website. More details and additional instructions for specific contingencies are contained in the Emergency Action Plan.

- Check for responsiveness. Responsiveness is when the person is able to respond when the responder calls their name or touches them.
- If the person is unresponsive, the responder should immediately call 911 for outside medical assistance and ask other personnel to bring the AED (if present) to the scene.
- Check to see if the victim is breathing normally.
- If no signs of breathing are observed, the responder should check for visible signs of airway blockage.
 - If obvious signs of airway blockage are noticed, the responder should attempt to remove the blockage.
- If no signs of breathing continue, the responder (or other trained personnel) should commence CPR.
- If CPR is being performed and the AED arrives to the scene, direct an assistant to begin setting up the AED for operation on the victim.
 - CPR should be continued during the time that the AED is being set up.
 - If the AED is placed into operation, remain near the victim, and follow AED instructions to ensure safety and proper victim monitoring. Maintain the victim with AED monitoring until trained medical responders arrive at the scene.
- If the victim has obvious broken bones, is bleeding profusely, or may have neck or spine injuries, the responder should not attempt to move the victim unless their immediate safety would be jeopardized by leaving them in that particular location. The responder should reposition the victim as comfortable as possible and apply pressure to mitigate areas of bleeding until trained medical personnel arrive at the scene.
- The responder should immobilize injured parts of the victim.
- The responder should prepare the victim for transportation if the victim can be safely moved.

- **Injuries**

- Notify the Control Room.
- Refer to DANS-SAFE-006, *Medical Response Procedure* and DANS-SAFE-014, *IJBP Exposure Control Plan*.
- Decisions and actions will vary according to the circumstances that produced the injury or medical emergency. The number of persons involved, the immediate environment, the availability of medical assistance, emergency dressings and equipment and help from others will require adaptation to the situation at hand.
- Some minor injuries such as cuts, scrapes and bruises may only require first aid treatment at the plant. R
- Other injuries may require that an employee be taken to a hospital or other medical supplier. In these cases, someone should be assigned to drive the injured employee to the hospital. This driver should remain at the hospital, communicate with the plant, and assist the injured employee until instructed otherwise.
- Serious injuries or medical emergencies such as contact with high voltage, loss of consciousness, compound fractures, heart attack, etc., will most likely require on-site emergency medical assistance. For these situations, the Control Room should be called immediately and should be notified of the nature of the injury (or medical emergency) and the location of the injured employee. The Control Room Operator will place the call for an ambulance and the Medical Response Team. In these cases, the injured employee should not be moved until medical personnel arrive, unless it is absolutely necessary.
- If an ambulance is required, the Crew Leader or designee will direct a Danskammer employee to the Entrance Gate to meet the ambulance and direct it to the location of the injured employee.
- The guard at the Entrance Gate should also be notified of the pending arrival of the ambulance .
- As soon as practical, complete the Accident Investigation Report, See DANS-SAFE-06A, *Incident Reporting Procedure*.

- **Automatic External Defibrillator (AED)**
 - The AED is stored in the Control Room.
 - Only employees trained in the use of the AED shall be permitted to use the AED in a medical emergency.
 - Daily AED inspections are performed by Operations.
- **Emergency Eye Wash and Safety Showers**
 - Inspected monthly by the Results Lab.

13.0 Hydrazine Solution Spills

- Notify the Control Room.
- Precautions:
 - Wear face shields, goggles and rubber gloves.
- Spill cleanup will be conducted by an approved Environmental Company.
- Spills should be flushed with water (not violently flushed). Use caution, because any contact with hypochlorite or other oxidizers will cause violent reaction.
- First Aid Measures:
 - Contact with eyes - flushed at least 15 minutes.
 - Inhalation of fumes - move to fresh air, restore and support breathing.
 - Contact Physician.

14.0 Sulfuric Acid Spills

- Notify the Control Room.
- Precautions:
 - Causes severe burns.
 - Vapor is extremely irritating.
 - Avoid breathing vapor or mist.
 - Wear full protective equipment consisting of hard hat with face shield, safety goggles, acid suit, rubber gloves and rubber boots.
 - Avoid contact with water.
 - Avoid contact with combustibles.
- Neutralize spill area with soda ash and flush away by flooding with water.
- May be necessary to evacuate and ventilate area.
- First Aid Measures:
 - Eyes: Immediately flush eyes with plenty of water for at least 15 minutes, while removing contaminated clothing and shoes. Call a physician.
 - Skin: Immediately flush with plenty of water for at least 15 minutes, while removing clothing and shoes. Call a Physician.
 - Inhalation: Remove to fresh air. If not breathing, call for Medical Response Team. If breathing is difficult, call a Physician.
 - Ingestion: If swallowed, give large quantities of water until a physician is contacted or arrives. Never give anything by mouth to an unconscious person.

15.0 Sodium Hydroxide Spills (Caustic Spills)

- Notify the Control Room.
- Precautions:
 - Sodium hydroxide is a strong alkali and can be destructive to all human tissue it contacts.
 - Avoid breathing vapor or mist.
 - Wear full protective equipment consisting of hard hat with full face shield, safety goggles, acid suit, rubber gloves and rubber boots.
 - Avoid contact with combustibles and aluminum, tin, zinc and alloys which contain these metals because hydrogen gas may be formed, which is flammable.
- Flush contaminated area with plenty of water and neutralize with dilute acetic acid and repeat flush with fresh water.
- First Aid Measures:
 - Eyes: Wash eyes immediately with plenty of water for at least 15 minutes. Rinsing eyes, including under the eyelids and all surfaces, is very important to avoid permanent eye injury. Get prompt medical attention.
 - Skin: Wash contaminated areas with plenty of water while removing clothing. Physician should see all cases except minor exposures. Continue flushing for prolonged times if exposure is serious.
 - Inhalation: Remove from exposure to mist or vapor and get prompt medical help.
 - Ingestion: Immediately give large quantities of water (never give anything by mouth to an unconscious person). DO NOT induce vomiting. Obtain immediate medical assistance.

16.0 Asbestos Emergency Plan

The following are guidelines to be used for the response to emergencies involving the release of asbestos or suspected asbestos containing-materials into the air within the building, if necessary and applicable. Because each occurrence is unique, an all-encompassing set of instructions cannot be developed. Guidelines have been developed to guide the Crew Leader to determine whether an event is an "emergency". However, when in doubt, be conservative.

- Persons responding to the emergency will wear a respirator with P100 filters.
- If possible, valve off or otherwise secure equipment if leaking steam or the equipment operation is blowing fibers into the air.
- Ventilation in the vicinity of the emergency should be secured, if possible, to prevent the spread of the contamination to other parts of the plant.
- Rope off the area at a reasonable distance and place warning signs.
- Notify the Maintenance Manager or designee. The Maintenance Manager will ensure:
 - Air monitoring is performed indicating a level of less than 0.1 fibers per cubic centimeter. Keep the area clear of non-essential personnel.
 - For cleanup of asbestos and removal of asbestos containing material, call one of the asbestos removal contractors. The list of current removal contractors is in the Maintenance Office.
 - A bulk sample of the material must be taken as soon as possible, unless the insulation can be positively identified as non-asbestos. The results of the sample, combined with the results of the air monitoring, will determine how and when any remaining insulation will be removed or repaired. Non-asbestos can be identified by an all blue or pink color, painted blue stripe, gold colored flakes embedded in the insulation or by a label on the lagging which states "Non-Asbestos."
 - A determination of non-asbestos by the person(s) responding to the scene will eliminate the necessity of performing steps 3 and beyond above.

17.0 Bomb Threat

- When the caller has communicated the threat, stay calm and do not manifest fear. Make a note as to the date and time of day.
- Keep the caller talking. The more they, the more that can be learned.
- Try to write down every word the caller says.
- If the caller does not indicate the location of the bomb or the time of detonation, ask the caller what time it is to go off and where it is located.
- If the caller has answered any of the above questions and is still on the line, ask their name and try to ascertain where they are calling from.
- It may be advisable to inform the caller that the building is occupied and the detonation of a bomb could result in death or serious injury to many innocent people.
- Listen closely to the voice of the caller and note the following:
 - Sex of Caller
 - Age of Caller
 - Race of Caller
 - Accent (is voice native to the area)
 - Speech Impediments or Peculiar Voice Characteristics- Drunk. etc.
 - Attitude of the Caller - Calm, Excited, etc.
- Pay particular attention to any strange or peculiar background noises such as street noises, motors running, music, television or radio programs, dishes rattling, babies crying, and other background noise which might give even a remote clue as to the origin of the call.
- Notify only those persons designated in the plan. Do not discuss the call with anyone unless authorized to do so. Do not leave your post or assignment unless instructed to do so by the person in charge.
- Complete a Bomb Threat Incident & Investigation Report.

Incident Report

After the person in authority has been informed of the call, the appropriate law enforcement agency should be advised of the threat and an organized search should follow.

Since the law enforcement personnel will be interested in talking firsthand with the person receiving the call, this person should remain available until law enforcement personnel are on the scene.

The Search

All authorities agree that the most effective and fastest search of a building can be made by the normal occupants of that building.

When made aware of a bomb threat:

- Check the work area for unfamiliar items.
- Do not touch suspicious items. Report them immediately to the supervisor.
- Take personal belongings when leaving.
- Leave doors and windows open. Do not turn light switches on or off.
- Move well away from the building and follow instructions from emergency responders.
- Some employees may be asked to help law enforcement search the facility.

Since the terrorist does not label the device with the word "bomb", what should be looked for? What does a bomb look like? No one knows. It can be packaged in as many different ways as the maker's imagination will allow. Some devices may be the size of a cigarette package, while others may be as large as a 2 ton truck.

In some instances, the detonation or ignition of any explosive or incendiary might depend on a change in environment, e.g. temperature variations or the presence of an electric current. The personnel assigned to conduct the search should be reminded not to cause, or at least minimize any change in the environment. Do not go into a dark room and turn on the lights or change the setting of the thermostats in the room.

18.0 Terrorist Threat

Terrorist: Employee

Do not allow former employees without an appointment or employees that have indicated a desire to harm other employees into the facility. Supervisors will inform staff if there are employees that are not to be allowed into the facility. In the event an employee does enter the facility with the intent of causing harm to others or the facility, immediately evacuate the facility and contact 911 and a supervisor. If it can be done safely, consult with a supervisor about shutting down plant equipment prior to evacuation.

Terrorist Non-Employee: Contractor, Unknown Individual, or Guest

Do not allow non-Danskammer employees into the facility without an appointment. In the event, a non-employee does enter the facility with the intent of causing harm to others or the facility, immediately evacuate the facility and contact 911 and a supervisor, if it can be done safely. Consult with a supervisor about shutting down plant equipment prior to evacuation. If an individual is identified that does not belong in the plant or in the area around the plant, determine if you are comfortable questioning the individual. If not, contact 911 and a supervisor immediately. If you do confront the individual, determine their intentions and take the appropriate actions to protect yourself and the facility.

19.0 Power Outage

All building occupants will meet in their respective evacuation areas (same as fire evacuation area) and remain in this area. Building occupants will only return to their office spaces using a flashlight, and only after notifying the Control Room. The Plant Manager or designee will determine if occupants will be sent home or wait for power to be restored.

20.0 Inclement Weather

If the local law enforcement agency has made the request that non-essential personnel stay off local roads, contact a supervisor to discuss the situation prior to leaving for work. If at work, every attempt will be made to allow personnel to go home at the earliest and safest time.

21.0 Loss of Potable Water

In the event the potable water is cutoff from the building, the Crew Leader will notify all building occupants of the loss of potable water. All jobs that have the potential to expose an employee to a hazard that would require the use of the safety shower or eyewash stations will be discontinued until an alternate safety shower or eyewash is made available.

22.0 Suspected Mail Hazard

All mail handlers should wash their hands immediately after handling mail. This includes opening mail addressed to you and those that sort mail.

If a piece of mail or any delivered package is suspected of containing a hazard, immediately isolate the area and do not handle the mail package. Contact a supervisor and inform them of your suspicions. A supervisor will then determine if local emergency response will be contacted.

Items to look for when sorting or opening mail:

- Mail with excessive postage
- Protruding wires or other parts
- Strange odors
- Strange Stains
- Discoloration of the packaging
- Strange titles or names
- A substance comes out of the envelope's package during handling
- Envelope/Package appear to contain something other than what is portrayed on the outside

23.0 Facility Evacuation for Any Other Reason

Notify the Crew Leader who will:

- Sound the alarm.
- Over the plant PA system, announce that the plant is to be evacuated.
- Instruct people in the plant take the safest route to the primary or secondary evacuation point.
- Contact the Plant Manager. The Plant Manager will manage further notifications.

Before calling the Plant Manager, call 911 if there has been an injury.

24.0 Cyber Security

Site personnel may become aware of a cyber incident or the potential for a cyber incident from a variety of sources, including email alerts, an employee, a regulatory agency, a business partner, or an outside source. In addition to the general emergency response measures, once a cyber security threat is verified, emergency response measures include:

- The Site Leader makes the unit safe or stabilizes the unit as needed, plans the recovery if appropriate.
- The Site Leader communicates to the following parties:
 - Immediate Supervisor;
 - Corporate Security;
 - Local Emergency Services, if appropriate; and
 - Transmission System Operator, if appropriate.
- The team restores the cyber assets affected by the incident to normal operations. This may require reloading data from backup tapes or reinstalling cyber assets from their original distribution media.
- Once the affected cyber assets have been restored, they are tested to make sure they are no longer susceptible to the vulnerability that caused the incident.
- The impacted system(s) is (are) tested to ensure it (they) will function correctly when placed back in production.

25.0 Natural Emergency, Severe Weather

Natural emergencies and severe weather events include, among other things, tornadoes, flooding, hurricanes, blizzards, high wind conditions, earthquakes, and severe thunderstorms. In addition to the general emergency response measures listed above, contingency specific measures include:

- The Site Leader at the Project should monitor weather-related emergencies. Information and warnings are available via local radio, television, and internet weather and news sites.
- When information is received that a severe weather watch or warning has been issued, the Site Leader should notify their Manager and site employees.
- The Manager will determine whether or not the Site should be shut down due to the weather situation. When severe weather is forecasted such as high winds associated with a hurricane, or other related conditions such as floods and/or storm surge, considerations for equipment shutdown should be taken consistent with the Site's operating practices and plans that ensure safety considerations first.
- Site personnel should seek indoor shelter in the plant in a designated secure location or other reinforced structure. Personnel should remain indoors if the severe weather is affecting the immediate area around the facility.
- The following list represents actions that should be taken at the Site for it to be secured. The listing is not intended to be all inclusive and will vary in applicability pending advance warning of the onset of the event.
 - Ensure Site personnel are safe and accounted for.
 - Seek safe shelter. If personnel are using a vehicle during winter, ensure a survival kit and sufficient gas are in place.
 - Ensure portable equipment, trash cans, tools, etc. are stored indoors.
 - Ensure that building doors are closed and latched.
- Sound the plant alarm system if a tornado or other similar severe weather warning is issued.

26.0 Physical Security

Physical security incidents can include intrusion, bomb threats, sabotage, vandalism, terrorism, or other similar security events at an electrical generation facility. If a hostile intruder enters the Site, each person shall quickly determine the most reasonable way to protect their own life. Visitors and contractors are likely to follow the lead of employees and managers during a hostile intruder situation. In addition to the general emergency response measures, each person shall take the following actions, accordingly:

- Evacuate,
- Hide Out,
- Take Action (as a last resort and only when lives are in imminent danger), and
- Call 911 when it is safe to do so.

In the event that the Site receives threatening correspondence either by phone or other means of communications, the following actions should be performed immediately:

- Gather as much information as possible from the person making the threat.
- If the threat is via written correspondence, place the correspondence in a location in which it will not be touched or otherwise disturbed until police can be contacted.
- If the threat is being made verbally (phone or other), communicate and obtain information from the individual making the threat for as long as possible. For phone threats, note the time of the call, do not interrupt the caller and describe the tone of voice as well as any background sounds.

After information on the threat is gathered, inform the Site Leader, contact Security Operations at 845-563-9118 x 2558, contact local law enforcement, as applicable (e.g., 911), then communicate the Physical Security Event to on-Site personnel.