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Wharton County Generation, LLC
Emergency Operations Plan (EOP)
(Per 16 TAC Sect. 25.53)

EXECUTIVE SUMMARY

For the PUC of Texas

1.1 INTRODUCTION

Wharton County Generation, LLC (WHARTON) is a power generation company (PGC) located within the Electric Reliability Council of Texas (ERCOT). On March 20, 2022, The Public Utility Company of Texas (PUC) amended 16 Texas Administrative Code (TAC) § 25.53 under Project Number 51841 to implement requirements of Utilities Code § 186.007, as amended by Senate Bill 3 (Rule). The revised Rule requires WHARTON to develop and maintain an Emergency Operating Plan (EOP) that meets certain content requirements established by the amended Rule. This Executive Summary provides the PUC with an overview highlighting these requirements found in the Wharton County Generation, LLC's Emergency Operating Plan – Version 1, as filed under Control Number 53385 with the PUC and filed as a Service Request in ERCOT's MIS.

It is important to note that while WHARTON is registered as a PGC, WHARTON is in the process of returning from mothball status and COD will not occur prior to December 2022.

1.2 CONTENTS AND POLICIES

(page numbers indicate starting page number)

- Hurricane Annex [as required by §25.53(e)(2)(E)] **PAGE 38/55**
  - Includes evacuation and re-entry procedures (WHARTON is in a hurricane evacuation zone, as defined by TDEM

- Cyber Security Annex [as required by §25.53(e)(2)(F)] **PAGE 97**
  - Provides written procedures on cyber security incidents

- Water Shortage Annex [as required by §25.53(e)(2)(B)] **PAGE 58**
  - Addresses supply shortages of water used in generation of electricity

- Physical Security Incident Annex [as required by §25.53(e)(2)(G)] **PAGE 105**
  - Addresses written procedures on dealing with physical security incidents

- Restoration of Service Annex [as required by §25.53(e)(2)(C)] **PAGE 68**
  - Identifies plans intended to restore WHARTON to service after it has failed to start or tripped offline due to a hazard or threat

- Pandemic/Endemic Annex [as required by §25.53(e)(2)(D)] **PAGE 73**
  - Provides procedures in the event of a declared Pandemic/Endemic

- Communication Plan [as required by §25.53(d)(2)] **PAGE 143**
  - Communication with the media, PUC, OPUC, fuel suppliers, local and state governmental entities, officials, and emergency operations centers (as appropriate), and applicable reliability coordinator
  - Training in latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System training
  - Distribution of the EOP to local jurisdictions, as needed

- Business Continuity Plan [as required by §25.53(c)(4)(C)(v)] **PAGE 123**
  - Demonstrates WHARTON maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident

- Drills [as required by §25.53(f)] **PAGE 10**
  - Process and documentation for conducting annual drills to test this EOP. At least one annual drill must include a test of the hurricane annex

- Record of Distribution [as required by §25.53(c)(4)(A)]

Tile	**Name**	**Date of access to and/or training on this EOP**
Plant Manager	Greg Mach	4/15/2022 – COD est. 12/9/22
Plant Administrator	Patti Hubenak	4/15/2022 – COD est. 12/9/22
Control Room Operator	Shawn Jimenez	4/15/2022 – COD est. 12/9/22
Control Room Operator	Austin Alexander	4/15/2022 – COD est. 12/9/22

- Emergency Contacts [as required by §25.53(c)(4)(B)]

Emergency Contact Name	**Title**	**Phone**	**Email**
Greg Mach (Primary)	Plant Manager	(979) 559-7285	Greg.mach@whartoncountygen.com
Shawn Jimenez	Control Room Operator		Shawn.jimenez@whartoncountygen.com
Ches Wright	Asset Manager	(916) 990-6013	ches.wright@ihipower.com
Keith Feemster	Asset Manager	(409) 988-4624	keith.feemster@rocklandcapital.com
Alonzo Ramirez	Rockland VP	(214) 236-6011	alonzo.ramirez@rocklandcapital.com
Matt Becker	Rockland VP	(713) 203-1793	matt.becker@rocklandcapital.com
Elena DeLaunay	Rockland VP	(917) 774-6911	elena.delaunay@rocklandcapital.com
Mike Garrett	Dir Compliance - EHS	(830) 832-7553	mike.garrett@ihipower.com

- Affidavit [as required by §25.53(c)(4)(C)]

AFFIDAVIT

STATE OF Texas)

COUNTY OF Montgomery)

PERSONALLY came and appeared before me, the undersigned Notary, the within named James Maiz - President, who is a resident of Montgomery County, State of Texas, and makes this his/her statement and Affidavit upon oath and affirmation of belief and personal knowledge that the following matters, facts and things set forth are true and correct to the best of his/her knowledge:

- Relevant operations personnel are familiar with and have received training on the applicable contents and execution of the Emergency Operations Plan, and such personnel have been instructed to follow the applicable portions of the Emergency Operations Plan except to the extent deviations are appropriate as the result of specific circumstances during an emergency that would warranty such deviations;

- The Emergency Operations Plan has been reviewed and approved by the appropriate executives of the entity;

- Drills have been conducted to the extent required per 16 TAC Sect. 25.53. Or
  Due to the expeditious applicability and implementation requirements of 16 TAC Sect. 25.53, the initial drill has been scheduled to take place on or before commercial operations;

- The Emergency Operations Plan has been distributed to local jurisdictions as needed;

- The entity maintains a business continuity plan that addresses returning to normal operations following disruptions caused by an incident;

- The entity's emergency management personnel who are designed to interact with local, state, and federal emergency management officials during an emergency event have received the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System training.

DATED this the 18th day of April, 2022.

James Maiz, President

SWORN to subscribe before me, this 18th day of April, 2022.

ASTRIX PORTILLO
Notary Public, State of Texas
Comm. Expires 05-20-2024
Notary ID 129086282

NOTARY PUBLIC

My Commission Expires: 5/20/2024

Wharton County Generation, LLC
Emergency Operations Plan (EOP)
(Per 16 TAC Sect. 25.53)

PUC of Texas

Project No: 51841
Filed Under Control Number: 53385
-Redacted Version
-Unredacted Version available upon request

ERCOT

Filed via ERCOT MIS
-Unredacted Version

Version 1
Date: April 18, 2022

Table of Contents

EMERGENCY OPERATIONS PLAN (EOP)

1.1 PURPOSE

This document has been developed for Wharton County Generation, LLC (WHARTON) to ensure compliance with Chapter 25 of the Public Utility Commission of Texas, Substantive Rules Applicable to Electric Service Providers, Subchapter C, Infrastructure and Reliability. §25.53. Electric Service Emergency Operations Plans.

WHARTON is defined below as a Power Generation Company per §25.5(82).

Power generation company (PGC) — A person that:

(A) generates electricity that is intended to be sold at wholesale.

(B) does not own a transmission or distribution facility in this state, other than an essential interconnecting facility, a facility not dedicated to public use, or a facility otherwise excluded from the definition of "electric utility" under this section; and

(C) does not have a certificated service area, although its affiliated electric utility or transmission and distribution utility may have a certificated service area.

Since Wharton is defined as a Power Generation Company, this Emergency Operations Plan (EOP) has been developed and filed per the requirements stated in §25.53(c).

1.2 RESPONSIBILITIES

(A) The Plant Manager, or his designee, has overall responsibility for the development, revision, and implementation of the EOP and for assigning the title and associated responsibilities of Emergency Coordinator to an employee to adequately cover all periods when the facility is occupied.

(B) The Operations & Maintenance (O&M) Manager is responsible for the execution of this EOP.

(C) The O&M Manager is responsible for annual drills. The O&M Manager is responsible for ensuring all outside organizations are notified, if necessary, and coordinating a response to the incident as well as directing the evacuation according to this EOP. The O&M Manager shall designate an Emergency Coordinator if the emergency requires personnel to evacuate.

(D) In the absence of the O&M Manager the control room operator (CRO) will act as the O&M Manager until relieved by management and shall account for all operation and maintenance (O&M) personnel on-site.

(E) The Emergency Coordinator shall maintain radio communication with the O&M Manager and keep a head count of all evacuated plant and contract personnel in order to report the status to the O&M Manager. The Emergency Coordinator may be any qualified plant employee.

(F) All personnel will be trained regarding fire routes, exits, storm shelters, the location and use of emergency equipment, and understanding and following the EOP. All personnel who have contractors or visitors at the facility shall ensure that they are familiar with the EOP.

1.3 SEVERE WEATHER PROCEDURES

Changes in the weather associated with fast-moving severe storm fronts as well as summer and winter events, may provide little or no warning. Tornados develop from powerful thunderstorms. They are incredibly violent local storms that extend to the ground with winds that can reach 300 mph. In the event of impending severe weather, plant personnel will monitor the local emergency weather broadcast. The safety of on-site personnel and the integrity of plant equipment will be the first concern. The O&M Manager shall be notified and will try to be on-site to determine appropriate action. If the O&M Manager cannot be contacted, the CRO shall determine the appropriate action.

During severe thunderstorms, caution will be used during outside activities. If thunderstorms are in the immediate area of the plant, outside activities will be curtailed as much as possible. Personnel shall avoid being the highest elevation on any structure. All mobile equipment (i.e., forklift) will be brought inside the warehouse. Ensure all gas cylinder racks are secured or brought inside if possible. The safety of plant personnel shall be the prime concern and reasonable judgment shall be used.

In the event a tornado is sighted or reported the actions of WHARTON's EOP (TORNADO PROCEDURE ANNEX) should be followed.

The definitions of severe weather events such as tornadoes, hurricanes, tropical depressions, storms, and flooding and criteria for identifying these events are provided in Hurricane and Flooding. Extreme cold and hot weather events are identified through Weather Advisories or receipt of other credible information.

Critical failure points during cold weather include transmitters and air lines. The freezing of this equipment will negatively impact the ability of the plant to operate. To help prevent freezing of

these critical failure points and critical piping, they have been insulated, heaters have been installed in critical areas, and an air dryer has been installed for all plant air systems to protect the equipment to a minimum of 10°F. Additional measures to prevent freezing of the equipment are presented in the Cold Weather section of the Extreme Cold Weather Procedure Annex.

In the event of an emergency shortage of water or drought, Wharton can store water on site for 36 hours of operation. During drought conditions Wharton will store greater than 500" of water in it T1 storage tank.

1.4 ALTERNATIVE FUEL PROCEDURE

During normal operations, natural gas is supplied to plant via pipeline from Houston Pipeline Company LP. Wharton burns pipeline quality natural gas exclusively and has no provisions for on-site storage of alternate fuels as well as no alternate supplier of fuel gas.

1.5 LOSS OF GENERATION CAPACITY

In the event of a unit or plant trip the priorities are to correct the cause of the trip and restart the unit/plant as soon as possible to restore generation capacity.

If the plant should trip and all power is lost from grid, then it will be necessary to wait until power is restored to the plant before attempting restart of the gas turbine. The following procedure will be used to respond to the event:

The intent of Loss of Generation Capacity Procedure Annex is that, once systems are restored and QSE is informed of "ready to restart" to perform startup of plant per operating procedures.

1.6 PANDEMIC MANAGEMENT PLAN OVERVIEW

No one can accurately predict when pandemic will occur or how severe it will be. To minimize economic or negative impact, consideration is given to the potential spectrum of possible pandemic scenarios as part of disaster preparedness and business continuity planning.

The Wharton *Pandemic Plan* (Pandemic and Endemic Annex) was developed to meet this objective. This document discusses all actions to take in event of a pandemic. It includes plans for staffing and preparation for possible pandemic.

1.7 HURRICANE PLAN OVERVIEW

Wharton will strive to manage maintaining the operation of the plant until such time that the safety of personnel, contractors, visitors and equipment is threatened or until the plant is unable to export power.

Should it become necessary to shut the plant down and evacuate the area, a minimum number of volunteers from the Emergency Hurricane Crew (EHC) identified in Hurricane Preparedness and

Response Annex may be asked to remain on site. The crew remaining after the shutdown will monitor the storm and maintain the plant as well as possible, maintain communications, provide management updates, and facilitate the damage assessment and recovery efforts after the hurricane threat has passed. It is the policy of the plant for the Plant Manager to not require the Emergency Hurricane Crew members to stay throughout the event if they feel their personal safety is at risk.

Final decisions as to what steps will be taken, and when they occur, will be made by the Plant Manager. The plan of the plant is to maintain continuous electric service during emergencies if it has been requested and if it's capable of doing so. The Plant Manager will make this determination given the specific conditions and circumstances.

1.8 AFFIDAVIT OF OPERATING PERSONNEL TRAINING AND COMMITMENT

The Wharton operating personnel will go through an annual training review of the information contained in the Emergency Operating Procedures in accordance with §25.53(c).

1.9 ANNUAL DRILL

Wharton operating personnel participates in plant casualty drills. A minimum of two drills will be conducted each year, beginning on March 20, 2022. Drills include major plant fires, loss of auxiliary power (black plant), summer/winter events, and tornados. A post-drill critique is conducted, and necessary corrective actions addressed. If the emergency response procedures were implemented within the last 12 months due to an actual event, the event response will satisfy the drill requirements.

One drill per year shall test the plants hurricane plan/storm recovery plan. WHARTON will notify commission staff 30 day prior to conducting the drill by using the method and form prescribed by commission staff on the commission's website, and with the appropriate TDEM District Coordinators, by email or other written form, of the date, time, and location of the drill.

1.10 EMERGENCY CONTACTS

Control Room.....Phone: (979) 657-0432 / Cell: TBD

Primary PLAN: Plant Manager – Greg Mach.....(979) 559-7285

Backup PLAN – CRO on Site Phone: .....(979) 657-0343

QSE..... Phone: (877) 336-3480 / Cell: (713) 597-1821

Asset Manager – Keith Feemster.....(409) 988-4624

Rockland VP – Alonzo Ramirez.....(214) 236-6011

Rockland VP – Matt Becker.....(713) 203-1793

Rockland VP – Elena DeLaunay.....(917) 774-6911

IHI Power Service Corp / Director of Operations– Ches Wright ……..……..(916) 990-6013

Sabotage Threat – Mike Garrett……..……..(541) 571-5435

1.11 COMMON OPERATIONAL FUNCTIONS RELEVANT ACROSS EMERGENCY TYPES

Plans within this document describe the process used to report and respond to unusual events. Plant management will immediately review pertinent event information, perform investigations as needed and make a determination on whether further action is needed. Plant management should perform this activity as expeditiously as possible.

Should plant management determine that action is needed for events. The following relevant emergency operation procedures shall be made active at once. If disaster or interruption to normal business occurs Business Continuity Plans and/or recovery instruction outline in corresponding plans will be invoked.

Planned plant site evacuation will be activated in the event of a future event requiring a schedule plant evacuation. Planned plant site evacuation can only be conducted if personnel have adequate time to conduct the activities safely. Events that would warrant a planned plant site evacuation would be events considered too dangerous to remain on site. This would normally be eminent natural disasters. Further details on site evacuation are located in Evacuation Procedures Annex.

1.12 APPROVAL AND IMPLEMENTATION

The following EOP, together with the Executive Summary and Annexes, was developed in accordance with Texas Administrative Code 16 TAC Sect. 25.53 (the Rule) adopted by the PUC of Texas (the Commission) on February 25, 2022. Wharton is subject to 16 TAC Sect. 25.53 and is, therefore, required to implement this EOP, including all components established by the Rule and to maintain the EOP, Executive Summary, and Annexes accordingly.

1.13 INDIVIDUALS RESPONSIBLE FOR EOP MAINTENANCE AND CHANGES

(List individuals responsible for maintaining and implementing the EOP and those who can change the EOP.)

Plant Manager – Greg Mach.....(979) 559-7285

Asset Manager – Keith Feemster.....(409) 988-4624

Rockland VP – Alonzo Ramirez.....(214) 236-6011

Rockland VP – Matt Becker.....(713) 203-1793

IHI Power Service Corp– Ches Wright .....(916) 990-6013

IHI Power Service Corp – Mike Garrett.....(830) 832-7553

1.14 PLAN ASSESSMENTS

Assessments will be conducted following annual drills and actual related emergencies to assess the overall effectiveness of the EOP.

1.15 ANNUAL UPDATES AND SUBMITTALS

Beginning 2023, if changes were made during the previous calendar year to this EOP that materially affect emergency response efforts, the Facility will update this EOP accordingly, no later than March 15th, each calendar year. In addition, the Facility will submit an executive summary to the commission that:

- describes the changes to the contents or policies contained in this EOP;
- includes an updated reference to specific sections and page numbers of this EOP (Contents – Required Sections) that correspond with the requirements;
- includes a record of distribution as required; and
- contains an affidavit as required.

In the event that no changes were made during the previous calendar year to this EOP that would materially affect emergency response efforts, the Facility will, in the alternative, file the following with the commission:

- a pleading that documents any changes to the list of emergency contacts as required;
- an attestation from the entity's highest-ranking representative, official, or officer with binding authority over the entity stating that that entity did not make a change to its EOP that materially affects how the entity would respond to an emergency; and
- an affidavit as required.

Wharton will update its EOP or other documents required under this section if commission staff determines that the Wharton EOP or other documents do not contain sufficient information to determine whether Wharton can provide adequate electric service through an emergency. If directed by commission staff, the Wharton must file its revised EOP or other documentation, or a portion thereof, with the commission and, for entities with operations in the ERCOT power region, with ERCOT.

Wharton must make a revised unredacted EOP available in its entirety to commission staff on request at a location designated by commission staff.

1.16 REVISION CONTROL

This EOP shall be reviewed not less than annually to confirm.

Notification to commission staff regarding changes shall be made within 60 day from acknowledgement.

1.17 REVISION BLOCK WITH APPROVAL DATES

Rev.	Date Approved	Revision Summary	By
Version1	04/12/2022	Update WHARTON EOP – Reflect updates to PUC 25.53	Greg Mach / Mike Garrett

This EOP submitted on April 18, 2022 supercedes all previous EOPs.

1.18 REPORTING REQUIREMENTS

Upon request by the PUC commission staff during activation of the State Operations Center by Texas Division of Emergency Management (TDEM), the updates will be provided on the status of operations, outages, and restoration efforts as required. Status updates will continue until incident-related outages are restored, unless otherwise notified by PUC commission staff.

The Facility will provide documentation of the event and/or lessons learned as required, if requested from PUC commission staff, by the date specified by the commission staff.

1.19 DRILLS

Wharton will conduct or participate in a minimum of one (1) drill each calendar year to test and assess the effectiveness of this EOP. Following each drill, the EOP will be revised as needed. If, however, Wharton has activated this EOP in response to an actual related emergency, performance of or participation in an annual drill is not required for that calendar year.

1.19.1 Hurricane Drills

Wharton operates in a hurricane evacuation zone as defined by the Texas Division of Emergency Management (TDEM) and will conduct an annual drill of the Hurricane Preparedness and Response Annex during each calendar year.

1.19.2 Drill Notices

At least 30 days prior to the date of at least one drill each calendar year, the facility will notify PUC commission staff (using the method and form prescribed by the commission) and TDEM District Coordinators (by email or other written form) of the date, time, and location of the drill.

1.20 COMMUNICATION PLAN

This Communication Plan describes the procedures used during an emergency for communicating with the media, the commission, Office of Public Utility Council (OPUC), fuel suppliers, local and state government entities, officials, Qualified Scheduling Entity (QSE), and emergency operation centers, as appropriate for the entity and the applicable reliablity coordinator. The plan address communication skills, training requirement, media communication instructions, and contacts.

This Communication Plan is designed for crisis communications for use in any situation. It has been adapted from existing EOPs and SOPs. The communication plan is used in conjunction with pertaining plans and procedures. This plan is intended to be used with existing plans and procedures in part with and not in place of.

This plan supplies responders and relevant personal a communication plan to inform across jurisdictions, disciplines, and levels of government as needed and if required. The procedure assists in reliable and timely communications among responders and relevant personal and between public agencies.

Communications

Wharton responds to events that will impact the bulk electrical system. Wharton works in conjunction with facility's Qualified Scheduling Entity (QSE)to relay facility conditions. If Wharton identifies an event impacting the operation of the facility, Wharton shall contact Qualified Scheduling Entity (QSE) as soon as practicable.

In conjunction with person-to-person Operating Instruction, beginning in 2022, Wharton has trained personal in IS-100, IS-200, IS-700, and IS-800 National Incident Management System training. Wharton uses IS-100, IS-200, IS-700, and IS-800 National Incident Management System training in coordination with annual drills.

Event Response

The facilities Plant Manager will serve as the Incident Commander/single point of contact for all response events.

When an Event has occurred, and a notification has been sent out from the facility, the facilities Operations Director will be the primary point of contact for all IHI Power Service Corp (IPSC) Senior Leadership Employees.

After initial notification of the event, the facility Plant Manager will contact and notify the IPSC SLT (Senior Leadership Team) , and facility ownership as needed.

The Plant Manager, in coordination with the IPSC SLT (Senior Leadership Team), will determine if a Crisis Management teleconference will be initiated for this event. If a teleconference will be initiated, the Operations Director will utilize the Everbridge teleconference notification system and phone numbers attached to the event.

Media and Official Communication Activation (only if required).

The need for a rapid message to media and / or elected officials is determined by the IPSC CEO. The IPSC CEO will craft messages, with assistance from the Leadership Team and Facility Manager, as necessary. Targeted audiences for messages will be determined and considered. The official media communication messages will be distributed as appropriate by the IPSC CEO or designee.

Media Relations Do's and Don'ts:

DO

- Always put reporters or local media in touch with media relations first.
- Make yourself familiar with the official media relations policy, available on Connect.
- Contact us if you're not sure about something - call the number on the reverse of this card.
- Ask for coaching or talking points if you are asked to speak in public.

DON'T

- Say "No comment." Most often, it leaves the impression of hiding information from the public.
- Instead, refer questions to media relations.
- Try to handle a hostile reporter on your own.
- Immediately agree to an interview.
- Approach the media on your own or solicit media stories on behalf of the company.

What do I do when contacted by the media?

If the media tries to contact, you or shows up at

your location, your first step should be to contact the IPSC SLT(Senior Leadership Team) and facility Plant Manager before any other kind of response.

Operating Personnel Communications

To reduce the possibility of miscommunication that could lead to action or inaction harmful to the reliability of the Bulk Electric System (BES) WHARTON shall require operating personnel that issue an oral two-party, person-to-person Operating Instruction to take one of the following actions:

- Confirm the receiver's response if the repeated information is correct.
- Reissue the Operating Instruction if the repeated information is incorrect or if requested by the receiver.
- Take an alternative action if a response is not received or if the Operating Instruction was not understood by the receiver.
- Wharton requires operating personnel that receive an oral two-party, person-to-person Operating Instruction to take one of the following actions:
- Repeat, not necessarily verbatim, the Operating Instruction and receive confirmation from the issuer that the response was correct.
- Request that the issuer reissue the Operating Instruction.

CONTACT NAME	Line Detail	PHONE
Qualified Scheduling Entity (QSE)	Main:	1-877-336-3480
	Cell:	1-713-597-1821
Energy Transfer Gas (aka Houston Pipe Line)	Office:	1-877-404-2730
Energy Transfer Gas (Houston)	Toll-free:	1-800-392-1965
PUCT Assistance	Hotlines:	1-888-782-8477
	Hotlines:	1-512-936-7120
Office of Public Utility Counsel (OPUC)	Austin:	1-512-936-7500
	Toll-free:	1-877-839-0363
	Fax:	1-512-936-7525
Wharton County Emergency Management Coordinator	Office:	1-979-532-4811 ext. 502
Texas Division of Emergency Management (TDEM)	Main Number/Texas State Operations Center:	1-512-424-2208
	ASSISTANT CHIEF:	1-281-517-1353
	SECTION CHIEFS:	1-409-504-0390
		1-215-952-9061
	DISTRICT COORDINATOR 16D:	1-281-633-4827
Texas RE	Main:	1-512- 583-4900
IPSC SLT (Senior Leadership Team)	Main:	1-916-990-6013 1-830-832-7553

1.22 EMERGENCY SUPPLIES MAINTENANCE PLAN

Plans within this document that require inventory and supplies will describe requirements for inspection, inventory, and functional testing of emergency equipment and supplies which are maintained for emergency operations and are implemented using Work Orders from Wharton work order management system (Maximo). Inventory and supplies are unique to their plan and each plan address its inventory and supplies per the plan's requirements and expectations.

The manager may make determinations for changes to quantities, types of items, or functional tests as needed for good emergency preparedness practices.

1.23 EMERGENCY RESPONSE STAFFING PLAN

Each Plan has developed a contingency staffing plan that finds minimum staffing needs and prioritizes critical and non-essential services, based upon facility needs and essential facility operations. Staffing numbers are dependent on specific requirements and site-specific emergency actions plans. The plant shall schedule additional personnel, as deemed appropriate by management, for around the clock coverage to assist in maintaining the facility during critical periods of operation. Staffing strategies are unique to their plan and each plan address its staffing needs per the plan's requirements and expectations. The manager may make determinations for changes to staffing as needed to best suit current needs.

1.24 PLAN FOR IDENTIFYING WEATHER-RELATED HAZARDS

The facility uses multiple technologies visual observations, and applications to check weather. Weather updates and forecast are discussed at morning meetings.

Actions are expected be completed days and hours before severe weather strikes. Emergency and regulatory agencies, subcontractors, and facility staff all need to be aware of their roles and responsibilities during an event.

Plan for the unexpected. Each type of weather event has unique hazards and response actions. Seek the Emergency action plans that covers your weather condition. Wharton typically uses a procedure that has a tiered response to a specific condition. Activate the related weather plan at once to put into place contingency addressed plan to weather related hazards.

1.25 VERIFICTION AND OPERATABILITY OF FUEL SWITCHING

Wharton does not have fuel switching capabilities.

2.0 ANNEXES

2.1 EXTREME COLD WEATHER PROCEDURE ANNEX

Wharton County Generation	OPERATIONS MANUAL SECTION I - OPERATING PROCEDURES	
Number: **SOP-17**	Subject: **Extreme Cold Weather Procedure**	
Approved for Use by:	Current Issue: **Revision 1 (R0)**	Issue Date: **4/5/2022**
Page 1 of 12	**Prepared by Greg Mach**	

1. **PURPOSE**
   a. The Winterization procedure will provide guidance for protection of equipment during severe weather conditions.

2. **SCOPE**
   a. This SOP provides instructions to plant personnel for securing plant equipment. Detailed checklist to be completed to secure equipment. Equipment modifications and operating experience will necessitate additions, and deletions to these procedures.
   b. It is acknowledged that this document does not cover all plant or system operating scenarios. This document has been developed to assist plant personnel with the knowledge to properly secure the plant and operate during severe weather conditions. This document does not take the place of sound operating practices or knowledge gained through experience.

3. **DEFINITIONS**
   a. Extreme Weather Condition – Weather conditions that warrant protection of equipment during conditions that can damage equipment, cause failure, or prevent the plant from dispatch.
   b. Freeze Stage 1 – Any condition where temperatures will reach 35 F or below.
   c. Freeze Stage 2 – Any condition where temperatures will reach 32 F or below.

4. RESPONSIBILITIES

a. The Plant Manager is responsible for the effective implementation of this procedure.

b. The Plant Manager is responsible for ensuring that plant personnel are properly trained and qualified, as required, to implement this procedure.

c. The Control Room Operator (CRO) is responsible for assigning a properly trained and qualified Operations and Maintenance Technician (OMT) to implement this procedure in a safe and effective manner.

5. LIMITS AND PRECAUTIONS

a. Environmental – Store fuel for heaters in proper containers and lockers

b. Health & Safety – Be aware of hot surfaces. Always wear proper PPE equipment when working on or around plant equipment. Ice/Snow on some areas may cause slippery surfaces.

c. Regulatory - There are no Regulatory requirements associated with this procedure.

d. Other - There are no other requirements.

6. PROCEDURE

a. The purpose of this plan is to ensure plant reliability and performance during extreme winter temperature conditions

b. This plan specifies the actions to be taken for preparing WHARTON's generating facility for reliable winter operation and the actions to be taken in the event that severe freezing weather is forecasted.

c. Freeze Stage 2 conditions are extreme temperatures during the winter months of the year that can have a detrimental effect on the operation of the plant. Freeze Stage 2 conditions are extremely cold temperatures < 32 deg F that can freeze instrument lines, prevent valves from proper operation and reduce plant operational performance when these conditions are present. Plant operations must be made aware of all equipment that could be affected during these cold periods. Operating equipment, equipment not in operation, and equipment in a standby state must be closely monitored.

7. WINTER PREPARATION

a. Prerequisites

b. Freeze Stage 0, all preparation requirements list below must be completed on or before November 1st of each year. Freeze Stage 0 Winterization Checklist will be completed, and findings entered as Work Orders entered in CMMS. All

requirements will be entered as a PM into the plant's CMMS to notify the plant of the upcoming requirements each year and to document completion of the preparation plans.

c. Prior to the commencement of winter preparation activities, a review of the previous year's deficiencies shall be conducted to address any issues encountered. Any actions required shall be noted This shall include but is not limited to:

d. Need for additional heat trace

e. Need for additional insulation

f. Need for additional or expanding of current wind break locations to be completed by end of first week of December

g. Determine useful life of existing equipment and determine if replacement of equipment is needed to ensure reliable operation

8. PLAN HEAT TRACE

a. Each year the plant shall inspect and test its heat trace system. This test shall include but is not limited to:

b. Functionality of power supplies including breakers and fuses

c. Verify the continuity of the heat trace circuits

d. Check the integrity of connections

e. Verify proper operation of heat trace control panels and monitoring devices, including thermostats, local and remote alarms, lights and monitoring cabinet heaters

f. Test the amperage and voltage of its heat trace circuits and determine if the output is within recommended specifications

g. Insulation

h. Each year the plant shall inspect its thermal insulation critical to the reliable operation of the plant

i. Verify that valves and connections are insulated to the same specification and ratings as the piping it is connected to

j. After all maintenance on systems that are insulated, an inspection shall be performed on the insulation to ensure that the insulation is returned to a satisfactory condition

k. Temporary Equipment

l. Each year the plant shall verify the appropriate inventory and functionality of all temporary equipment including:

m. Temporary heat trace

n. Portable heaters

o. Post Season

p. After the threat of freezing weather has passed for the season, the plant shall perform the following steps:

q. Take down all temporary wind breaks

r. Remove all temporary equipment and place it into storage, noting any deficiencies and ordering replacements for the deficient equipment

9. SEVERE WEATHER FORECASTED

a. Prerequisites

b. This section will be adhered to immediately prior to temperatures forecasted for < 32 degrees Fahrenheit, during Freeze Stage 1 conditions, for a period of greater than 12 hours and will remain in effect until temperatures are maintained above 35 degrees Fahrenheit for an extended period of time.

c. Plan Staffing

d. The plant shall schedule additional personnel, as deemed appropriate by management, for around the clock coverage to assist in freeze prevention and thawing operations.

e. Monitoring

f. The plant, at a minimum, shall verify the proper operation of the heat trace system every 12 hours. Any issues that are encountered in the trace system shall be entered into the plant CMMS and shall be repaired as soon as possible

g. All rooms that contain equipment that is susceptible to freezing shall be checked every 12 hours for satisfactory temperatures

h. The plant operator will monitor vital systems that could jeopardize the reliable operation of the plant

i. Verify that all enclosure doors and windows are closed and secured

j. Perform Compressor Bleed Valve Test when unit is Offline 12 hours.

k. Temporary Equipment

l. Temporary Equipment such as heaters and tarps shall be placed in areas as needed

m. Temporary wind breaks

n. Non-Essential Water Systems

o. All non-essential water systems shall be drained to prevent damage

p. Post Event

q. Remove, clean and refill (as necessary) all temporary equipment

r. Note any deficient equipment and repair as soon as possible

10. TRAINING

a. The plant shall conduct initial training with its operation/maintenance staff that covers proper operation and maintenance of the heat trace system, proper thawing techniques, winterization awareness and actions to be taken in the event of freezing weather.

11. RECORDS

a. Extreme Weather Checklist.

12. TRAINING REQUIREMENTS

a. Personnel having responsibility assignments associated with this procedure shall be properly trained. All training shall be appropriately documented and maintained annually.

FREEZE STAGE 0 WINTERIZATION CHECKLIST

Wharton County Generation LLC

206 Vat Road

Boling, TX 77420

Instructions

This checklist is to be completed Monthly beginning November 1st of every year through March. Each component will be installed and verified complete, signed off, and dated. This is a requirement of the Winterization Plan and will be saved for record keeping.

Check	Signature	Date
Check Installed Shelters		
Check Insulation Installed		
Diesel Heater Staged and Tested		
Verify Heat Trace Functions		

Notes

Upon completion of this checklist turn in to Plant Manager for review

FREEZE STAGE 1 WINTERIZATION CHECKLIST

Wharton County Generation LLC

206 Vat Road

Boling, TX 77420

Instructions

This checklist is to be completed whenever temperatures will reach 35F or below. Each component will be verified complete, signed off, and dated. This is a requirement of the Winterization Plan and will be saved for record keeping.

Check	Signature	Date
Check Installed Shelters		
Check Insulation Installed		
Diesel Heater Staged and Tested		
Verify Heat Trace Functions		
Check Shelter Installed		
Cooler Filter Drained		
All Eyewash Stations Flowing		
Appendix D Logs Printed & in Use		

Notes

Upon completion of this checklist turn in to Plant Manager for review

FREEZE STAGE 2 WINTERIZATION CHECKLIST

Wharton County Generation LLC

206 Vat Road

Boling, TX 77420

Instructions

This checklist is to be completed whenever temperatures will reach 32F or below. Each component will be verified complete, signed off, and dated. This is a requirement of the Winterization Plan and will be saved for record keeping.

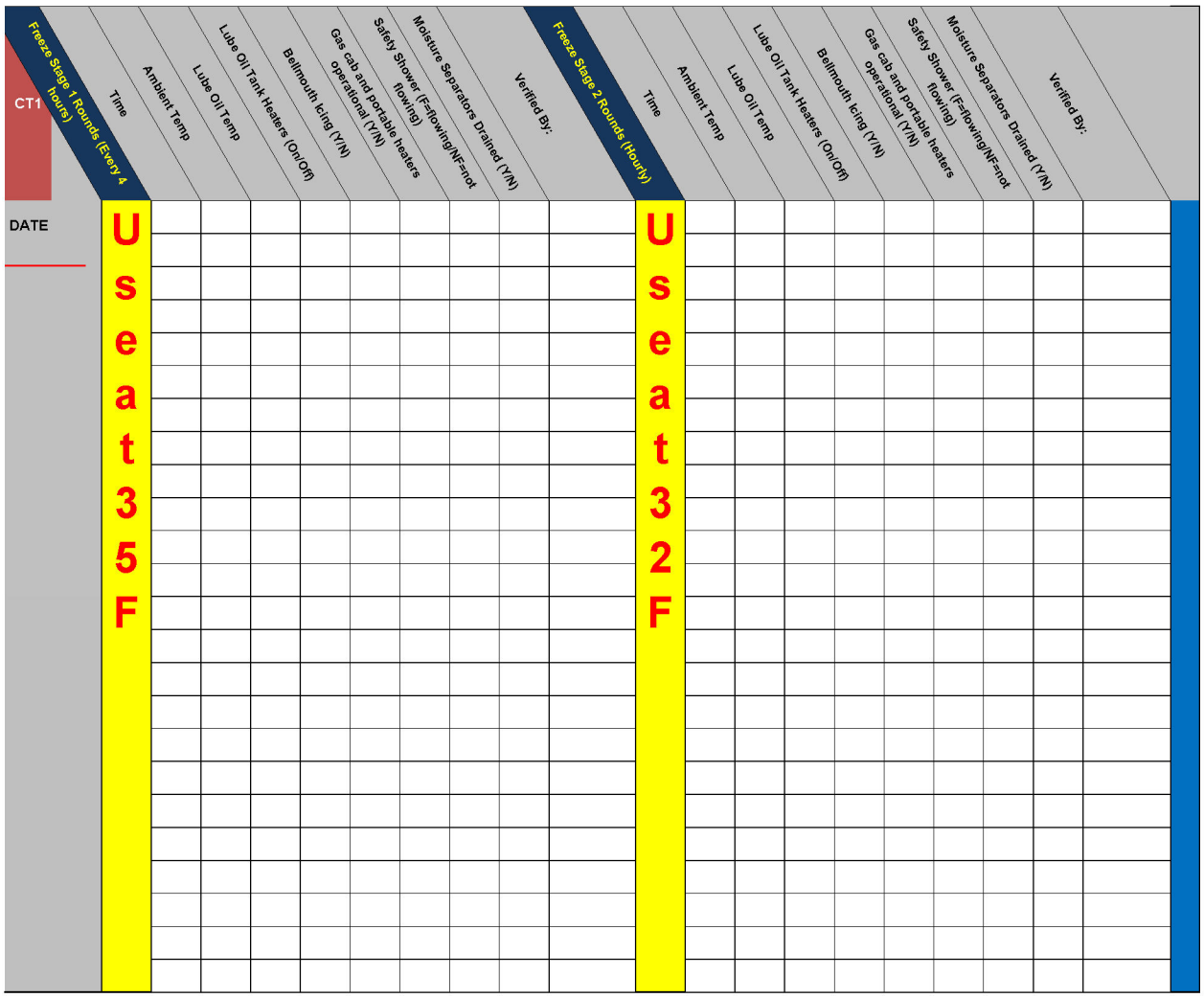
Check	Signature	Date
Hourly Winterization Logs Printed and in Use		
Check Bellmouth Window Hourly for Icing		

Notes

Upon completion of this checklist turn in to Plant Manager for review

Freeze Stage 1 & 2 Rounds Checklist

(Units 1)



WEATHER WATCH CHECKLIST

Instructions

This checklist is to be completed every 4 (four) hours once a Freeze Stage 0 has been enacted. The NOAA weather tracker will be used to forecast weather changes for the upcoming 4 (four) hour block.

WCG Weather Watch Logs	https://forecast.weather.gov/MapClick.php?lat=29.26144000000005&lon=-95.94247499999994#.YfHE3vvMI

Only use this Round sheet if the plant is at a Freeze Stage 0 in conjunction with deteriorating conditions.

If a future temp is expected to trigger a change in Freeze state, please document this round sheet. Please use the attached website for forecasting.

Date	Time	Current Ambient Temp °F	Time/Temp °F in 4 hours (Actual)	Time/Temp °F in 4 hours (Actual)	Time/Temp °F in 4 hours (Actual)	Current Freeze Stage	Verified by:

EXTREME COLD WEATHER PREPAREDNESS LIST

Quantity	Item	Check 1st week of June
1 case	AA-BATTERIES	
1 case	C-BATTERIES	
1 ea.	COLEMAN PROPANE STOVE	
6 bottles	PROPANE CAMPING GAS	
1 ea.	POT / PAN (Cooking utensils)	
1 ea.	BATTERY OPERATED WEATHER RADIO	
1 roll	ROPE (1/2" POLYESTER, 6LB., 100')	
6 rolls	DUCT TAPE (2" W X 60 YDS LONG)	
1 ea.	CAN OPENER	
1 roll	PLASTIC SHEETING	
4 boxes	LARGE TRASH BAGS	
2 ea.	FLASHLIGHT	

EXTREME COLD WEATHER LIST OF FOOD, PERSONAL HYGIENE & MISCELLANEOUS ITEMS

Emergency Supplies-Hygiene & Misc.			EMERGENCY SUPPLIES-FOOD NON-PERISHABLE		
Quantity	**Check**	**Description**	**Quantity**	**Check**	**Description**
10 cases		Bottled Water	9		MRE, 3-day supply per person
12 rolls		Toilet Paper			
3 cases		Clorox Wipes			
6 each		Toothbrushes			
2 each		Toothpaste			
3 each		Cots			
6 rolls		Paper Towels			
3 cans		Disinfectant Spray			
2 bottles		Hand Sanitizer			
2 boxes		Gallon Zip Lock Bags			
2 cases		Paper Plates			
2 boxes ea.		Forks, Spoons & Knifes			
1 box		Strike anywhere matches			
3		Emergency Candle			

2.2 EXTREME HOT WEATHER PROCEDURE ANNEX

Wharton County Generation	OPERATIONS MANUAL SECTION I - OPERATING PROCEDURES	
Number: **SOP-19**	Subject: **EXTREME HOT WEATHER PROCEDURE**	
Approved for Use by:	Current Issue: **Revision 1 (R1)**	Issue Date: **1/5/2022**
Page 1 of 12	**Prepared by Greg Mach**	

EXTREME HOT WEATHER PROCEDURE

1. **PURPOSE**
   a. The Summer Weather procedure will provide guidance for protection of equipment during hot weather conditions.

2. **SCOPE**
   a. This SOP provides instructions to plant personnel for plant readiness, Detailed checklist to be completed to secure equipment. Equipment modifications and operating experience will necessitate additions, and deletions to these procedures.
   b. It is acknowledged that this document does not cover all plant or system operating scenarios. This document has been developed to assist plant personnel with the knowledge to properly secure the plant and operate during severe weather conditions. This document does not take the place of sound operating practices or knowledge gained through experience.

3. **DEFINITIONS**
   a. Extreme Summer Weather – Weather conditions that warrant protection of equipment during conditions that can damage equipment, cause failure, or prevent the plant from dispatch.

4. RESPONSIBILITIES

a. The Facility Manager is responsible for the effective implementation of this procedure.

b. The Assistant Plant Manager is responsible for ensuring that plant personnel are properly trained and qualified, as required, to implement this procedure.

c. The Control Room Operator (CRO) is responsible for assigning a properly trained and qualified Operations and Maintenance Technician (OMT) to implement this procedure in a safe and effective manner.

5. LIMITS AND PRECAUTIONS

a. Environmental – Store glycol for exchangers in proper containers.

b. Health & Safety – Be aware of hot surfaces. Always wear proper PPE equipment when working on or around plant equipment.

c. Regulatory - There are no Regulatory requirements associated with this procedure.

d. Other - There are no other requirements.

6. PROCEDURE

Necessary steps to be taken during the immediate months leading up to summer weather conditions:

a. All air conditioning units will be operated, inspected and routine maintenance checks regularly performed to ensure they are functioning correctly. This maintenance task will be shared by the operations department.

b. Prior to summer operation the heat exchangers shall be evaluated for performance and any other significant issues that may impact operational performance.

c. The River Pump Station will be inspected on a monthly basis and any issues remediated immediately.

d. The Sump Pump Station will be inspected on a weekly basis and any issues remediated immediately.

e. The T1 Tank inventory shall be maintained >300" at all times; every effort will be made to ensure this water inventory is maintained.

f. Critical Spare parts inventory shall be verified prior to entering summer operation.

g. A review of Maximo open corrective maintenance work orders will be performed to confirm that there are no issues that will be worsened by hot weather. Any open work orders meeting these criteria shall be immediately addressed and repaired or counter measures will be put in place to mitigate issues or problems that arise.

h. The Evaporative Cooler will be inspected, and any issues immediately addressed to prevent impact on operation.

Necessary steps to be taken during the time periods when temperatures have exceeded 100F:

i. All maintenance to be done must be approved by Plant Superintendent prior to commencing task.

7. RECORDS

a. Summer Weatherization.

8. TRAINING REQUIREMENTS

a. Personnel having responsibility assignments associated with this procedure shall be properly trained. All training shall be appropriately documented and maintained annually.

9. ATTACHMENTS

Attachment 1 – Summer Weatherization Check List

1	Verify all A/C units for control and motor center are properly working	Contractor performed inspections and testing on all plant A/C units.	SAT/UNSAT	Initial	Date
2	Verify CT Lube Oil coolers differential temperatures and pressures are normal	Verified D/T and pressures are in normal range	SAT/UNSAT		
3	The T1 Tank inventory shall be maintained >300" at all times	Verified levels are in normal range	SAT/UNSAT		
4	The Sump Pump Station will be inspected	Any issues remediated immediately	SAT/UNSAT		
5	The Evaporative Cooler will be inspected	Any issues remediated immediately	SAT/UNSAT		
6	Verify Generator cooler temperatures and pressures are within range	Verified during dispatched runs.	SAT/UNSAT		
7	Verify all transformer radiator fans are functioning properly.	Operationally tested at each transformer	SAT/UNSAT		
8	Verify all Lube Oil cooler sprays	Function test/verified. All nozzles working	SAT/UNSAT		

9	Plant Eye Wash Stations – Verify lined up.	Function tests all eye wash stations for cracked or broken pipes or caps	SAT/UNSAT		
10	Turbine Compartment Vent Fans	Check for proper operation.	SAT/UNSAT		
11	Accessory Compartment Vent Fans	Check for proper operation	SAT/UNSAT		

2.3 FLOOD MITIGATION PLAN ANNEX

Wharton County Generation	OPERATIONS MANUAL SECTION I - OPERATING PROCEDURES	
Number: **SOP-18**	Subject: **FLOOD MITIGATION PLAN**	
Approved for Use by:	Current Issue: **Revision 2 (R1)**	Issue Date: **4/5/2018**
Page 1 of 12	**Prepared by Greg Mach / Shawn Jimenez**	

FLOOD MITIGATION PLAN

The National Weather Service will issue a flood watch or warning for the area. As flood conditions develop, monitor the storm's progress, flood water's predicted critical water levels and timing. Be aware of other weather conditions that may accompany flood conditions.

If it is determined that flooding conditions will impact the plant, determine what materials, equipment, and vital records will be secured and protected based on available manpower, predicted intensity and timing of the event. Employee safety is the top priority – consider the time it will take to evacuate the threatened area when making plans.

Determine a plan for the timing and orderly shutdown and evacuation of the plant based on expected weather conditions.

If personnel are unable to evacuate safely, they should communicate their location to offsite emergency personnel and contacts then seek shelter in the best structure available with emergency medical supplies, bottled water, and communication devices.

After the event, secure the site, check for safety hazards, and notify key personnel.

Flooding, Orderly Shutdown

- Determine flood's anticipated impact on plant, predicted water levels, and the timing of event.
- Employee safety is the highest priority. Evaluate the amount of time and manpower available considering time to evacuate and safely shutdown plant.
- If time and manpower allow prioritize vital records to protect from water. Remove from site or store in elevated shelving in secure building. Determine any materials and equipment that site can protected from water damage and move to safe area.
- Based on predicted water levels determine if and to what extent installing sandbag protection is beneficial.
- If it is determined that flooding might strand plant employees on site, verify that there are emergency rations of food and water on site to last the duration of the flood event.
- Notify local emergency services and company management if there are stranded employees at the plant and the status of their safety.
- Maintain reliable communications on site in the event of adverse changes to flooding conditions.

2.4 HURRICANE PREPAREDNESS AND RESPONSE ANNEX

Wharton County Generation	OPERATIONS MANUAL SECTION I - OPERATING PROCEDURES	
Number: **SOP-20**	Subject: **HURRICANE PREPAREDNESS AND RESPONSE**	
Approved for Use by:	Current Issue: **Revision 1 (R1)**	Issue Date: **1/13/2022**
Page 1 of 11	**Prepared by Greg Mach**	

HURRICANE AND FLOODING PROCEDURE

1. HURRICANE POLICY

WHARTON will strive to manage maintaining the operation of the plant until such time that the safety of personnel, contractors, visitors and equipment is threatened or until the plant is unable to export power.

Should it become necessary to shut the plant down and evacuate the area, a minimum number of volunteers from the Emergency Hurricane Crew (EHC) identified on Attachment 1 may be asked to remain on site. The crew remaining after the shutdown will monitor the storm and maintain the plant as well as possible, maintain communications, provide management updates, and facilitate the damage assessment and recovery efforts after the hurricane threat has passed. It is the policy of the plant for the Plant Manager to not require the Emergency Hurricane Crew members to stay

throughout the event if they feel their personal safety is at risk.

Final decisions as to what steps will be taken, and when they occur, will be made by the Plant Manager. The plan of the plant is to maintain continuous electric service during emergencies if it has been requested and if it's capable of doing so. The Plant Manager will make this determination given the specific conditions and circumstances.

2. PURPOSE

This Hurricane Preparedness and Response Plan (Plan) has been developed to assure that the plant and employees are prepared in the event that a tropical storm or hurricane weather condition should threaten to strike the Texas coast. The Plan is a complement to the WHARTON Emergency Response developed pursuant to 29 CFR 1910.120(q).

This procedure provides information and outlines steps to protect personnel and equipment against the possible destruction of a hurricane and is a guideline to follow rather than a set of rigid rules. The severity, speed and expected area of landfall will determine the time that these steps will be taken. The plant rely on the National Weather Service broadcasts for the latest changing weather conditions and the probability values for possible landfall of a tropical storm or hurricane.

3. DEFINITIONS

Hurricane is a tropical cyclone in which the maximum sustained surface wind is 64 knots (74 mph) or greater.

Hurricane Category under the Saffir-Simpson wind Scale estimates potential property damage. Hurricanes reaching Category 3 and higher are considered major hurricanes because of their potential for significant loss of life and damage. See Table 3.1.

Table 3.1 Saffir-Simpson Wind Scale[1]

Hurricane Category	Pressure (Inches)	Pressure (Millibars)	Wind Speed (MPH)
I	28.94 and up	> 980	74 – 95
II	28.50 - 28.91	965 - 979	96 – 110
III	27.91 - 28.47	945 - 964	111 – 130
IV	27.17 - 27.88	920 - 944	131 – 155
V	< 27.27	< 920	> 155

Hurricane Season, officially extends from June 1st through November 30th

Hurricane Warning is a warning that sustained winds of 64 knots (74 mph) or greater, associated with a hurricane are expected in a specified coastal area in 24 hours or less.

Hurricane Watch is an announcement for specific areas that a hurricane or an incipient hurricane poses a possible threat to a coastal area, generally within 36 hours.

Storm Surge is an abnormal rise in sea level accompanying a hurricane or other intense storm, and whose height is the difference between the observed level of the sea surface and the level that would have occurred in the absence of the storm.

Storm Tide is the actual sea level resulting from the astronomical tide combined with the storm surge.

Tropical Depression is a tropical low-pressure system in which the maximum sustained surface wind is 33 knots (38 mph) or less.

Tropical Storm is tropical low-pressure system in which the maximum surface wind ranges from 34 to 63 knots (39 to 73 mph). This is the strength at which the National Hurricane Center applies a name to the storm.

[1] https://www.nhc.noaa.gov/aboutsshws.php

Tropical Storm Warning is a warning for tropical storm conditions with sustained winds within the range of 39 to 73 mph, which are expected in a specified coastal area within 24 hours or less.

Tropical Storm Watch is a Tropical storm conditions pose a threat to a coastal area generally within 36 hours.

4. RESPONSIBILITIES

- **Plant Manager**

The Plant Manager (or designee) is responsible for:

- Overall preparation and execution of the Plan, which includes declaring and terminating emergencies. During such times the Plant Manager responsible for administrative control of all plant and emergency personnel activities.
- Assessing the impending weather situation and determining if and when to evacuate employees and whether to close down either Facility.

- **Control Room Operator (CRO)**

  - The Plant Manager will designate two CRO with different shifts which will be responsible for:
  - Hurricane Prevention and Response Plan
  - Checking and maintaining emergency supplies
  - Tracking and informing the Facility Manager of impending hurricanes
  - Providing technical assistance and personnel accountability during emergencies, and
  - Ensuring plant areas and equipment are secured in advance of the storm

- **Plant Personnel**

  - Plant personnel are responsible for:
  - Securing all plant equipment
  - Checking and removing potential air borne objects from the plant premises, and

- Providing emergency plant operations and maintenance.

If the plant will remain open during the storm, employees should complete all necessary advance preparations to secure their family and homes and be prepared to report for emergency duty when called. Due to the limited capabilities, employees should not seek plant site shelter for their families.

5. PROCEDURE

The following procedures will be followed should any of the listed scenarios occur:

a. Hurricane Season Preparation

The start of hurricane season is June 1. As part of preparing for hurricane season, the plant shall:

- Conduct a Hurricane Preparation Drill to ensure that the plant is prepared should a hurricane occur in the area.
- Begin closely monitoring local weather forecasts and N.O.A.A weather forecasts for early signs of tropical storm warnings.
- All employees will review the Plan, which will be discussed and registered in the May Safety Meetings signing sheets until all personnel are accounted for.
- Maintain a hurricane tracking data log (Attachment 4).
- Ensure that the items listed for the Hurricane Kit (Attachment 2) are available. If not available, place order to complete the kit.
- Check condition of plant roads and initiate repairs as needed.
- Check employee rain gear supplies.
- Check condition of doors, windows and compartment/building doors and initiate repairs as needed.
- Check condition of telephone and radio systems and initiate repairs as needed.
- Check first aid kits (Attachment 3) and restock if necessary.

- Check conditions of portable and stationary sump pumps and repair if necessary

b. Hurricane Watch

A tropical storm/hurricane has formed and has entered the Gulf of Mexico and has become a potential threat to the immediate area within 36 hours.

- Check schedule for available duty personnel and notify those people to maintain their readiness for call out (i.e., bedding, change of clothes, personal hygiene items, medications, special dietary needs, etc.).
- Prepare emergency food supply.
- Check supply of treatment chemicals and all calibration gases; order as needed.
- Move mobile equipment to safe area to be tied down if it becomes necessary.
- Ensure that plant truck and utility vehicles are fueled.
- Pick up and secure all loose objects throughout the sites.
- Collect all exposed fire extinguishers, etc. and place them inside a secure enclosure.
- Secure all doors and windows on all buildings, skids and turbine compartments.
- Distribute tarps and rope, as needed, in control room, electronics room and switchgear enclosures.
- Tie down all compressed gas bottles.
- Secure all instrument and electrical junction box covers.
- Empty all trash receptacles and place them indoors. If possible, move trash dumpster into storage building area.
- Ensure transformer pit drains are open.
- Top off all tanks.

c. Hurricane Warning

A warning has been issued by the National Weather Service that sustained winds of 64 knots (74 mph) or greater, associated with a hurricane, are expected in a specified coastal area in 24 hours or less.

- The Plant Manager will decide whether and when to shut down the plant and send employees home.
- If plant will close, shut down all units utilizing shutdown procedures.
- Review section 5.2 and walk down plant to ensure all items have been completed.
- Control Room Operator will continue to monitor the progression of the storm and will continually update the Plant Manager.
- Transfer predetermined files to the chosen safe location. Back-up computers files onto discs and remove discs to safe location.
- Cover computers and other electronic equipment with plastic to protect against water damage.
- All emergency duty personnel shall remain at the plant until released.

d. Hurricane at Hand

This phase starts when weather conditions make work or travel outdoors hazardous. When wind speed exceeds 50 mph, all outside movement should be avoided if possible.

At this time, all staff must wear a safety harness if it becomes necessary to go outdoors, so they may be able to tie off when possible. If it becomes necessary to go outdoors, no employee will work or make rounds alone.

e. Post Emergency

This phase begins when weather hazards have passed. Although the storm may have passed, hazards may still exist due to water and wind damage that may present hazardous conditions to personnel and equipment.

- Walk down the plant to assess damage. Make an accurate report of all damage and repairs needed. Use video and photographs to document damage.
- Review the Plan for improvement.
- Restore all hurricane supplies

f. Other Natural Phenomena

This section applies to natural phenomena that may be experienced at the plant, including, but not limited to, tornadoes, strong winds, or flooding. The following steps will be implemented should any of these conditions be experienced:

a. Verify and Assess

Upon observance of abnormal weather conditions, the plant personnel will utilize every possible means at hand to determine the potential or real threat of the situation to personnel safety and the facility.

- Immediately notify the Plan Manager upon observance of the weather condition.
- Contact the National Weather Service or use the control room weather radio to determine the exact conditions in the area.
- Be aware of any information being provided over the Emergency Broadcast System regarding the conditions and actions required

b. Classify and Notify

The Plant Manager shall determine the severity of the conditions and declare the appropriate Emergency Classification (as specified in the Emergency Response Plan).

c. Action

The Plant Manager shall determine the severity of the conditions and declare the appropriate

Emergency Classification (as specified in the Emergency Response Plan).

6. RESOURCES

FEMA (http://www.fema.gov/)

Houston/Galveston National Weather Service Office (http://www.srh.noaa.gov/hgx/)

Texas Department of Public Safety (http://www.txdps.state.tx.us/dem/)

ATTACHMENTS

- Employee Phone List
- Hurricane Kit List
- List of Food, Personal Hygiene & Miscellaneous Items
- Hurricane Tracking Data Log

7. RECORDS OF CHANGE

Revision	Issue Date	Description of Change	Changed By (name)	Approve (name)
Draft A		Initial document	G. Mach	G. Mach

ATTACHMENT 1 - EMPLOYEE PHONE LIST

NAME	TITLE	WORK PHONE	HOME PHONE	CELL PHONE
Greg Mach	Plant Manager	979-657-0432		979-559-7285
Shawn Jimenez	CRO	979-657-0432		979-533-1518
Austin Alexander	CRO	979-657-0432		409-594-2170
Patti Hubenak	Plant Admin	979-657-0432		979-533-1876

ATTACHMENT 2 – HURRICANE KIT LIST

Quantity	Item	Check 1st week of June
1 case	AA-BATTERIES	
1 case	C-BATTERIES	
1 ea.	COLEMAN PROPANE STOVE	
6 bottles	PROPANE CAMPING GAS	
1 ea.	POT / PAN (Cooking utensils)	
1 roll	ROPE (1/2" POLYESTER, 6LB., 100')	
6 rolls	DUCT TAPE (2" W X 60 YDS LONG)	
1 ea.	CAN OPENER	
1 roll	PLASTIC SHEETING	
4 boxes	LARGE TRASH BAGS	
2 ea.	FLASHLIGHT	
3	WHISTLES FOR SIGNALING HELP	
1 case	MOIST TOWELETTES FOR PERSONAL SANITATION	
1	HAND CRANK RADIO WITH NOAA ALERTS	
3	RAINCOATS	
3	BLANKETS	
3	COTS	
1case	MATCHES	

ATTACHMENT 3 – LIST OF FOOD, PERSONAL HYGIENE & MISCELLANEOUS ITEMS

Emergency Supplies-Hygiene & Misc.			EMERGENCY SUPPLIES-FOOD NON-PERISHABLE		
Quantity	**Check**	**Description**	**Quantity**	**Check**	**Description**
10 cases		Bottled Water	9		MRE, 3-day supply per person
12 rolls		Toilet Paper			
3 cases		Clorox Wipes			
6 each		Toothbrushes			
2 each		Toothpaste			
2 each		Air Mattress			
6 rolls		Paper Towels			
3 cans		Disinfectant Spray			
2 bottles		Hand Sanitizer			
2 boxes		Gallon Zip Lock Bags			
2 cases		Paper Plates			
2 boxes ea.		Forks, Spoons & Knifes			
1 box		Strike anywhere matches			
3		Emergency Candle			

ATTACHMENT 4 – HURRICANE TRACKING DATA LOG

			Position		Wind	
Date	Time	Name	Latitude	Longitude	Direction	Speed

2.5 TORNADO PROCEDURE ANNEX

Wharton County Generation	OPERATIONS MANUAL SECTION I - OPERATING PROCEDURES	
Number: **EOP-16**	Subject: **TORNADO**	
Approved for Use by:	Current Issue: **Revision 1 (R1)**	Issue Date: **4/05/2022**
Page 1 of 2	**Prepared by Greg Mach**	

TORNADO PROCEDURE

1. **TORNADO**
   a. Know:
   b. Tornado watch and tornado warning conditions
   c. Where tornado shelters are in your building
   d. When to initiate appropriate emergency procedures

2. **TORNADO WATCH**
   a. Weather conditions are right for a tornado to occur, but none have been sighted.
   b. Notify others in your area that a tornado watch is in effect.
   c. Monitor the weather with a radio or a television.
   d. Make certain the plant cell phone is fully charged.
   e. Note when the watch is in effect. Be prepared for the announcement that cancels the watch or upgrades it to a warning.

3. **TORNADO WARNING**
   a. A tornado has been sighted in the vicinity.
   b. Remain calm.
   c. Notify all personnel in the plant that a tornado has been sighted and to proceed to the tornado shelter.

d. Remove the plant from manual control and leave running in fully automatic.
e. Notify the Real Time Desk group that the plant is in auto, and you are abandoning the control room.
f. Proceed to the tornado shelter, taking cell phone with you. (Turbine MCC Room)
g. When possible, to do so safely notify plant management that you have abandoned the control room and are taking shelter.
h. If you are unable to go to the tornado shelter, remain calm. Rooms with no windows that are near the center of the building may provide good shelters. If you are outdoors, curl up in a drainage ditch or other low-lying area.
i. Stay away from windows, and do not go outside. Flying debris can cause serious injury.
j. Stay in the shelter until the warning is lifted

4. TORNADO STRIKE

a. If you are not in the tornado shelter, curl up on the floor with your face down. Cover your head with your arms and hands. If you are outdoors, curl up in a drainage ditch or other low-lying area.
b. After the tornado moves on or dissolves, if the building is damaged, begin an evacuation.
c. Assist the injured. Follow Medical Emergency procedures.

5. RECORDS OF CHANGE

Revision	Issue Date	Description of Change	Changed By (name)	Approve (name)
Draft A		Initial document	G. Mach	G. Mach

2.6 EVACUATION PROCEDURES ANNEX

Wharton County Generation	OPERATIONS MANUAL SECTION I - OPERATING PROCEDURES	
Number: **SOP-22**	Subject: **Evacuation Procedures**	
Approved for Use by:	Current Issue: **Revision 1 (R1)**	Issue Date: **4/5/2022**
Page 1 of 12	**Prepared by Greg Mach**	

EVACUATION PROCEDURES

Planned plant site evacuation will be activated in the event of a future event requiring a schedule plant evacuation. Planned plant site evacuation can only be conducted if personnel have adequate time to conduct the activities safely. Events that would warrant a planned plant site evacuation would be events considered too dangerous to remain on site. This would normally be eminent natural disasters.

Planed Plant Site Evacuation

1. Acknowledge all individuals Impacted by the Disaster. Notify the Real Time Desk group, Plant Asset Owners, Plant Personal, and Contracted Asset Operators or the disaster.
2. Establish Roles and Responsibilities for All Constituents
    a. Communications

        Establish mutable points of contact in the evet a system is lost.

Distribute communication options primary and secondary. Examples phone numbers would be spouse, family, hotel, etc.

3. Provisions for Evacuation
    a. Safeguard IT, Cybersecurity, and Physical Data.

        Ensure data backup are current and stored off site.

        Remove or make secure data that cannot be backed up. This include important paper documents, plant drawings, and media that cannot be replaced.

    b. Prioritize Fire Safety Planning

        Remove the hydrogen from the generator and lay up with nitrogen.

        Ensure flammable materials are secure.

    c. Prioritize Electrical Safety Planning

        Consider going plant black

        Open substation breakers and remove power from the site.

        Short necessary Current transformers.

    d. Secure outside item

        Ensure materials and plant items are stored.

        Ensure proper housekeeping is in effect.

RECORDS OF CHANGE

Revision	**Issue Date**	**Description of Change**	**Changed By** (name)	**Approve** (name)
Draft A		Initial document	G. Mach	G. Mach

2.7 WATER SHORTAGE ANNEX

Wharton County Generation	OPERATIONS MANUAL SECTION I - OPERATING PROCEDURES	
Number: **SOP-23**	Subject: **Water management**	
Approved for Use by:	Current Issue: **Revision 1 (R1)**	Issue Date: **4/5/2022**
Page 1 of 7	**Prepared by Greg Mach**	

WATER MANAGEMENT

OBJECTIVES:

The water management plans found within this document were developed to identify current water supplies to each facility, individual monitoring requirements, contingency plans for each water district, if any, and plant specific contingency plans in addition to the plans published by the water districts.

Water Supply:

WHARTON's water is supplied by the San Bernard River via a 264-acre-foot reservoir owned by Phillips 66. WHARTON owns 19,000 acre-feet per annum at a maximum diversion rate of 30,000 GPM (gallons per minute) in water rights from the San Bernard River and maintains majority usage of the reservoir.

Monitoring Requirements:

WHARTON does not have any current requirements to monitor drought conditions. The site personnel voluntarily monitor river and reservoir levels on a monthly basis and stay up to date on current drought conditions. Monthly conference calls to monitor drought status will be held with Houston Generation management and all ERCOT facilities in the event of statewide drought conditions.

Contingency Plans:

WHARTON owns senior water rights on the San Bernard River and only in extreme drought conditions would WHARTON be subjected to diversion restrictions. There are no known restrictions for consumption once the water has been diverted into the reservoir.

Plant Specific Contingency Plans:

As mentioned above, only in extreme conditions would WHARTON be limited on water diversion from the San Bernard River. However, river conditions (i.e., low levels) prevalent over the last 3-4 years prohibit WHARTON from diverting water from the San Bernard River due to physical pumping limitations. As a preventative measure, WHARTON maintains the reservoir at the highest levels by diverting water from the San Bernard River into the reservoir after rain events significant enough to raise the river level suitable for pumping. WHARTON monitors the river level on the USGS website alert feature and visual inspection.

In extreme drought conditions where pumping from the San Bernard River was either restricted by the water authority and/or impossible due to low river levels for extended periods of time the reservoir would provide a buffer for continued operations of the facility. The duration of time provided is dependent on evaporation rates and the number of operational hours. Constant monitoring of the situation would continue during these extreme periods. When the reservoir level drops to low level, WHARTON would rent 'Frac' tanks and pump water from the reservoir into the tanks for storage to mitigate losses due to evaporation and provide enough water for short operations. Joint meetings between the plant, Houston generation management and the LPM commercial group would occur to review operational scenarios in the event of low water supplies.

Records of Change

Revision	Issue Date	Description of Change	Changed By (name)	Approve (name)
Draft A		Initial document	G. Mach	G. Mach

Texas State Overview of Future Water Projections

Water management in the Texas region is crucial to ensure continuous reliable operation of the generation assets located there. According to the 2012 Texas State Water Plan developed by the Texas Water Development Board, demand of water will increase from 18 million acre-feet per year in 2010 to 22 million acre-feet per year in 2060 while the supply of water will decrease from 17 million acre-feet per year in 2010 to 15.3 million acre-feet per year in 2060.

FIGURE ES.2. PROJECTED WATER DEMAND AND EXISTING SUPPLIES (ACRE-FEET PER YEAR).

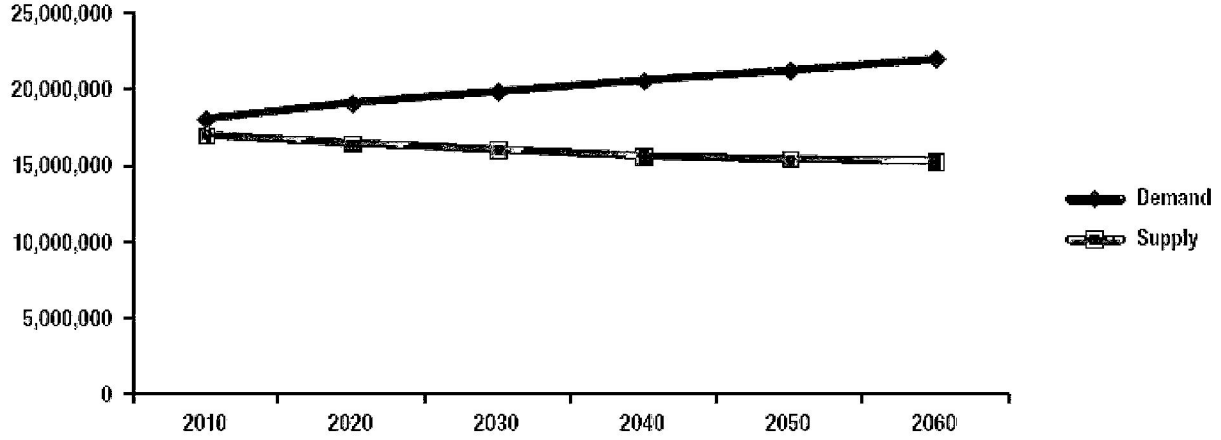
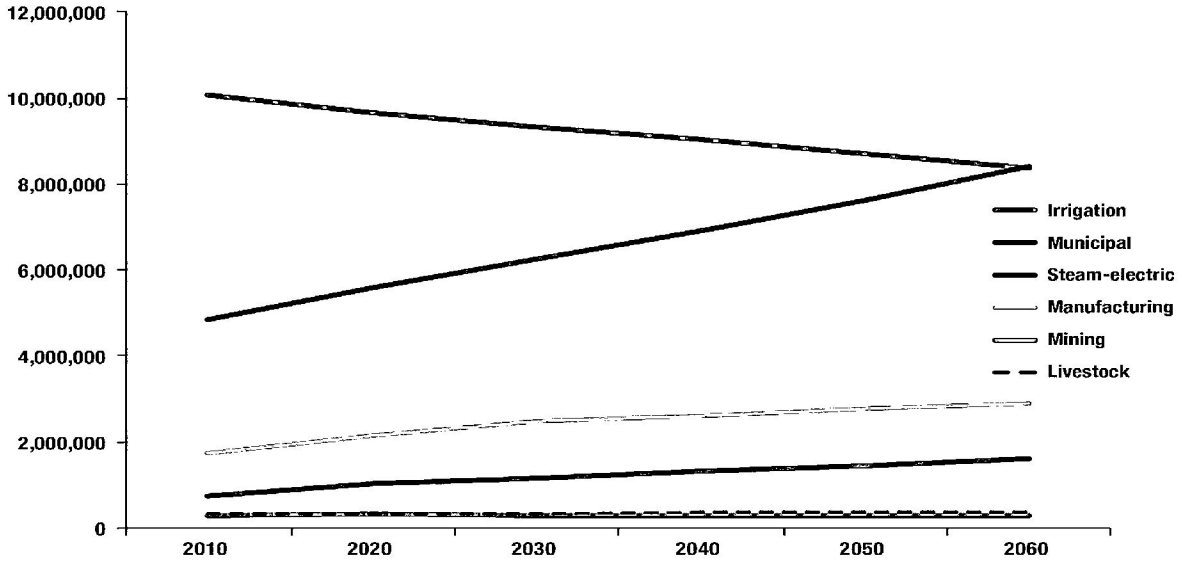
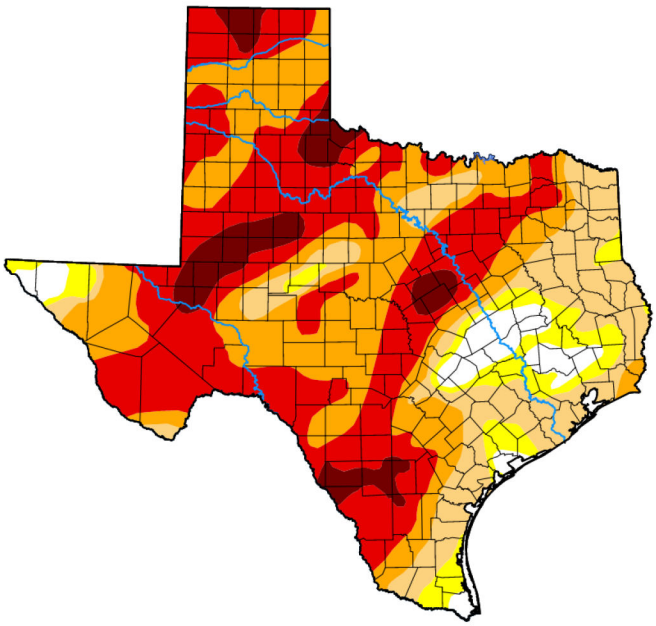


FIGURE ES.3. PROJECTED WATER DEMAND BY SECTOR (ACRE-FEET PER YEAR)



The state is currently working on allocation of the resources needed to meet this shortfall. Potential new sources of water supply include desalination from both brackish water and from the Gulf of Mexico. In addition to stress on existing water supplies from the anticipated population growth, recent drought conditions have exacerbated the situation particularly in the US Southwest.



Map released: Thurs. March 31, 2022

Data valid: March 29, 2022 at 8 a.m. EDT

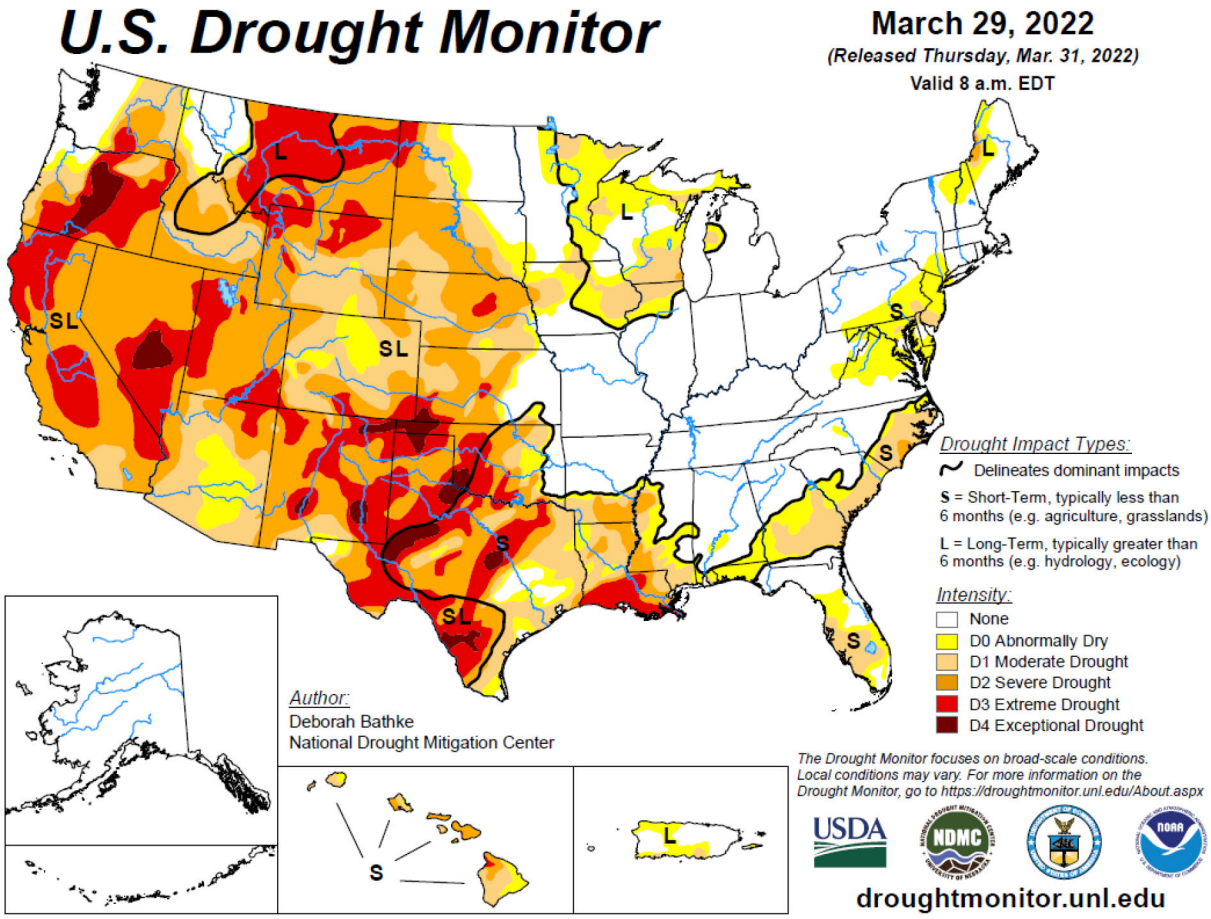
Intensity

- None
- D0 (Abnormally Dry)
- D1 (Moderate Drought)
- D2 (Severe Drought)
- D3 (Extreme Drought)
- D4 (Exceptional Drought)
- No Data

Authors

United States and Puerto Rico Author(s):
Deborah Bathke, National Drought Mitigation Center

Pacific Islands and Virgin Islands Author(s):
Richard Heim, NOAA/NCEI



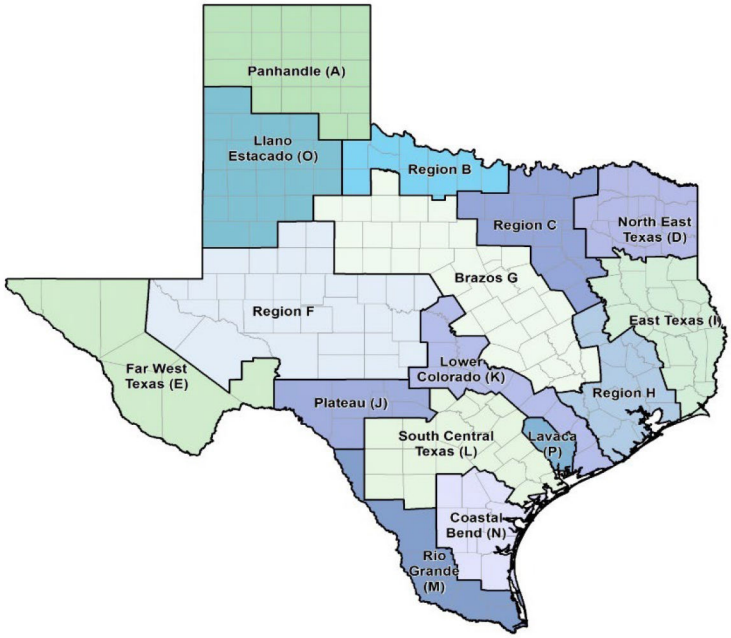
Texas Regional Planning Areas

Texas is divided into several Regional Water Planning Areas, of which three are pertinent to WHARTON generating assets: Regions C, L & K. There are 12 main stakeholders involved in the planning process in the State, each with very different interest. These include:

- Public interest, Municipalities & Counties
- Industrial assets, Water Utilities & Electrical Generating Utilities and Companies
- Environmental Agencies, Groundwater Monitoring Entities & Agricultural Interest
- River Authorities & Water Districts

- Small Businesses

An overview of Regions C, L & K follow.



Region K Water Planning Area

WHARTON is located within the Lower Colorado (K) Region Water Planning Area. Region K includes all or parts of 14 counties including parts of Wharton County. In 2010, nearly 6 percent of the state's total population resided in the Lower Colorado Region, and between 2010 and 2060 its population is projected to increase by 100 percent to 2,831,937. Water demands, however, are projected to increase less significantly. By 2060, the region's total water demand is projected to increase by 27 percent.

	2010	2020	2030	2040	2050	2060
Projected Population	1,412,834	1,714,282	2,008,142	2,295,627	2,580,533	2,831,937
Existing Supplies (acre-feet per year)						
Surface water	892,327	892,689	894,886	897,359	900,286	900,477
Groundwater	270,557	270,268	269,887	268,936	268,527	268,594
Total Water Supplies	**1,162,884**	**1,162,957**	**1,164,773**	**1,166,295**	**1,168,813**	**1,169,071**
Demands (acre-feet per year)						
Municipal	239,013	288,152	336,733	382,613	428,105	467,075
County-other	29,630	33,820	36,697	40,438	44,673	49,273
Manufacturing	38,162	44,916	56,233	69,264	77,374	85,698
Mining	30,620	31,252	31,613	26,964	27,304	27,598
Irrigation	589,705	567,272	545,634	524,809	504,695	468,763
Steam-electric	146,167	201,353	210,713	258,126	263,715	270,732
Livestock	13,395	13,395	13,395	13,395	13,395	13,395
Total Water Demands	**1,086,692**	**1,180,160**	**1,231,018**	**1,315,609**	**1,359,261**	**1,382,534**
Needs (acre-feet per year)						
Municipal	6,671	17,867	25,289	36,420	76,771	120,999
County-other	223	1,725	4,347	8,128	11,610	14,892
Manufacturing	146	298	452	605	741	934
Mining	13,550	13,146	12,366	6,972	5,574	5,794
Irrigation	234,738	217,011	198,717	181,070	164,084	135,822
Steam-electric	193	53,005	53,175	76,430	81,930	89,042
Livestock	188	188	188	188	188	188
Total Water Needs	**255,709**	**303,240**	**294,534**	**309,813**	**340,898**	**367,671**

2.8 LOSS OF GENERATION CAPACITY PROCEDURE ANNEX

Wharton County Generation	OPERATIONS MANUAL SECTION I - OPERATING PROCEDURES	
Number: **EOP-7**	Subject: **Combustion Turbine Generator Trip**	
Approved for Use by:	Current Issue: **Revision 1 (R1)**	Issue Date: **4/5/2022**
Page 1 of 6	**Prepared by Greg Mach**	

1. INITIAL CONDITIONS

[redacted]

2. SYMPTOMS AND INDICATIONS

[redacted]

3. POSSIBLE CAUSES

[redacted]

4. IMMEDIATE ACTIONS

[redacted]

[redacted]

5. SUPPLEMENTARY ACTIONS

[redacted]

2.9 PANDEMIC AND ENDEMIC ANNEX

PANDEMIC/INFLUENZA GUIDELINE

RECORD OF REVISIONS AND VERSION

Revision Date	Version	Summary of Revision or Change	Approved By:
02/24/202	1	Updated Guideline	Mike Garrett
03/18/20	2	Updated Cleaning and Disinfecting Guidelines	Mike Garrett
05/04/20	3	Updated to include sections on Symptoms, Quarantine, Return to Work, and Use of COVID-19 Testing	Mike Garrett
05/26/20	4	Updated AV Office Reopening Guidelines	Mike Garrett
06/08/20	5	Updated Return to Work Guidance	Mike Garrett
11/03/20	6	Update on Testing and Quarantine Guidelines	Mike Garrett
12/03/20	7	Update in Attachment 2 – Covid-19 Prevention Requirements	Mike Garrett
12/07/20	8	Update to reflect change to CDC quarantine timeline	Mike Garrett
12/08/20	9	Update to add Hazard Analysis requirements for all tasks that have employees within 6 feet of each other	Mike Garrett
03/27/21	10	Update Attachment 7 – IPSC Headquarters for opening	Mike Garrett
04/26/21	11	Update on Quarantine Requirements – Fully Vaccinated	Mike Garrett
06/20/21	12	Update per CDC and OSHA guidance on Fully Vaccinated	Mike Garrett
08/17/21	13	Update per CDC and OSHA guidance on Masks	Mike Garrett
12/27/21	14	Update per CDC and OSHA on quarantine/isolation guidance and update to Attachment 2	Mike Garrett

1.0 INTRODUCTION

This document outlines IHI Power Services Corporation (IPSC) general guideline for the fleet and Facility/Plant/General Managers to use as a foundation for guiding their planning to prepare their facility for the potential effects of any declared pandemic and also establishes the protocol for cleaning and disinfecting areas that have been subjected to an exposure of the Coronavirus.

Information contained in this outline was drawn from the World Health Organization (WHO), Center for Disease Control (CDC) and Occupational Safety and Health Administration (OSHA) This document addresses the continued safe operation of IHI Power Services Corporation fleet and does not address other potential business area issues expected to confront IPSC as a company.

Corporate support will be provided to the IPSC fleet is referenced in areas such as HR policy, global pandemic monitoring, business continuity planning, communications, information technology and medical support.

2.0 REFERENCES

Centers for Disease Control and Prevention (CDC) - Business Pandemic / Influenza Planning Checklist

Occupational Safety and Health (OSHA) -Guidance on Preparing Workplaces for an Influenza/Pandemic OSHA 3327-02N (2007)

OSHA Emergency Temporary Standard – (29 CFR 1910, Subpart U) 1910.501 – Vaccination, Testing, and Face Coverings

Occupational Safety and Health (OSHA) – COVID-19 Control and Prevention (2020)

World Health Organization (WHO) - Pandemic Influenza Risk Management (2017)

California Department of Public Health (CDPH) – Covid-19 Industry Guidance: Office Workspaces

Cal/OSHA Subchapter 7 – General Industry Safety Orders – 3205. Covid-19 Prevention

3.0 DEFINITIONS

A. **Cleaning:** the removal of dirt and impurities, including germs, from surfaces. Cleaning alone does not kill germs but by removing the germs, it decreases their number and therefore any risk of spreading the infection.

B. **COVID-19:** Coronavirus disease 2019.

C. **Commodities** – Defined as main fuel source, back-up supply, chemicals and other bulk commodities used to produce power.

D. **Consumables** - Goods used by individuals and businesses that must be replaced on a regular basis. Examples include emergency food supplies, coffee, stationary products, cleaning supplies, etc.

E. **Disinfecting** - The killing of germs on surfaces using chemicals. Disinfecting does not necessarily clean dirty surfaces or remove germs but killing the germs remaining on a surface after cleaning further reduces the risk of spreading the infection.

F. **Phase I - Pandemic Alert**

Federal and state governments are notified that a pandemic is possible. Planning should be conducted to deal with potential outbreaks.

G. **Phase II - Pre-Pandemic**

Localized outbreaks of the disease are occurring with human-to-human transmission. This is expected to occur in third world countries. At this point, resources associated with pandemic response should be specifically identified and contingency plans reviewed. Information distribution to the public and to employees should occur during this phase.

H. **Phase III - Pandemic Outbreak**

General outbreaks of the disease across national borders will signal the failure of initial containment efforts. Execution of contingency plans and response plans should occur in this phase.

I. **Phase IV - Maximum Disruption**

Pandemic affects local area and employees. High absentee rates (up to 40%) and associated fatalities would begin to affect the workforce and product delivery. This phase could last for several months. There may be multiple waves of the pandemic, with each wave lasting six to eight weeks.

J. Phase V - Prolonged Recovery

Altered business conditions will prevail. Loads will be unpredictable. The economy will be weakened. Basic services such as supply chain, law enforcement and other government agencies may be limited. This phase could last up to six months following containment of the pandemic.

K. SARS-CoV-2: Severe Acute Respiratory Syndrome (SARS) is a viral respiratory illness caused by a strand of coronavirus that causes the disease COVID-19

4.0 RESPONSIBILITIES

4.1 IPSC Corporate

4.1.1 Corporate support will be provided to the IPSC fleet is referenced in areas such as HR policy, global pandemic monitoring, business continuity planning, communications, information technology, travel policy, and medical support.

4.2 Facility Plant Managers

4.1.2 It is the responsibility of the Plant Manager to ensure that the plant is prepared in the event of a pandemic and will oversee all daily operations of the plant from production to ensuring policies and procedures are followed.

4.3 Facility Ownership

4.1.3 Will partner with IPSC Corporate and Facility leadership to develop capacities for mitigating the effects of a pandemic, including robust contingency and business continuity plans and provide resources as needed.

4.4 IPSC Ops Directors

4.1.4 Will work directly with Facility Plant Managers in creating and overseeing facilities preparation for pandemic. Will communicate with IPSC Corporate, Facility Ownership, and IPSC Safety Director on status and resources needed.

4.5 IPSC Safety Director

4.1.5 Will provide guidance and updates to all parties with the latest information provided by Centers for Disease Control and Prevention (CDC), World Health Organization (WHO), OSHA, and local EMS providers.

5.0 INSTRUCTIONS – (INTEGRATION OF PHASE-TO-PHASE APPROACH)

5.1 Phase I: Pandemic Alert

5.1.1 Human cases of influenza/illness have been identified. Not easily spread by human-to-human transmission.

5.1.2 IPSC develops pandemic strategy and response plans.

5.1.3 IPSC distributes communications re: personal pandemic preparedness with employees.

5.1.4 IPSC promotes safe hygiene practices.

5.1.5 IPSC Corporate will provide facility management with the most up-to-date information available.

5.1.6 Plant Management to work with Ownership to determine target inventory levels for commodity required at start of pandemic to support estimated plant needs during pandemic.

5.1.7 Develop a plan to reach consumables inventory levels.

5.1.8 Identify key operating positions and minimum staffing levels required to continue operations.

5.1.9 Determine the available personnel who possess the necessary training and experience to fill key positions.

5.2 Phase II: Pre-Pandemic

5.2.1 Government begins an information distribution program to promote appropriate actions /behaviors for citizens and employees.

5.2.2 Verify all Crisis Management Protocols are tested, updated, and reviewed with staff. Verify emergency communication systems (911, Satellite phones, etc.) are functioning and all local emergency response numbers are current.

5.2.3 IPSC IT prepares remote access and conference call capabilities.

5.2.4 Implement consumables inventory strategies developed in Phase I. Buy and stockpile required supplies early and have contracts in place for support.

5.2.5 Continue to train personnel to assume key positions.

5.2.6 Evaluate all planned outages, accelerate completion of ongoing outages. Identify individuals to staff positions required.

5.2.7 Establish process for dealing with incubated employees.

5.2.8 IPSC promotes safe hygiene practices. Sick employees must stay home. Distribute informational fliers to employees' families giving guidance regarding precautions to take included cleaning procedures, disinfection and stockpiling of supplies.

5.2.9 IPSC supervisors discuss contingency strategies with their employees in the event the outbreaks escalate. Specific personnel are assigned to maintain critical operations.

5.2.10 Increase housekeeping/custodial services. Clean more frequently. Instruct custodial staff to use an all-purpose disinfectant to clean all doors, door handles, handrails, coffee stations, elevator buttons, common area tables and chairs, restrooms, etc. For operations with shift work, clean and ventilate workspace between shifts.

5.2.11 Employees will be responsible for cleaning their own workstations, including desk surface, keyboard, mouse, and phone.

5.2.12 If an employee travels (non-business) to a pandemic active region, upon completion of the travel, they will be required to maintain a 14-day quarantine without pay.

5.2.13 Travel restrictions will start to be implemented based off available information.

5.3 Phase III: Pandemic Outbreak

5.3.1 IPSC announces pandemic policies, including social-distancing and work-from- home strategies, screening station procedures, and travel restrictions.

5.3.2 Implement a process for screening personnel entering facilities. – Guidance has been provided below and each facility should work with their local Occupational Clinic or Hospital for further information.

5.3.3 Post notices at facility entry points, advising employees not to enter if they have flu/ influenza symptoms.

5.3.4 Each facility shall establish personnel accountability for their personnel.

5.3.5 Increase "social distancing" by limiting face-to-face meetings, closing cafeterias, canceling training, and eliminating all non-essential employee travel. Make maximum use of e-mail, telephone, teleconference and Live Meeting capabilities.

5.3.6 Sick employees stay at home until medically approved to return to work.

5.3.7 Employees will need access to food and water rations, waste facilities, and protective gear.

5.3.8 If necessary, review facility site security plan.

5.3.9 Remove items, such as magazines, papers, non-disposable cups, dishes, and silverware, from common areas (cafeterias, lobbies).

5.3.10 In the event an employee becomes ill at work, thoroughly disinfect the workspace.

5.3.11 Critical operations will be maintained with reduced staff in the field, and from home. Modified HR policies will be developed and implemented. Generating plants will be staffed by four rotating shifts. Maintenance and support personnel will be assigned to these operating shifts as necessary. Minimum staffing of operations will be maintained while the balance of personnel will remain at home on "Stand-by." Those required to report to work and those on stand-by will be rotated.

5.4 Phase IV: Maximum Disruption

5.4.1 IPSC instructs the majority of its employees to stay home, except for those employees sustaining the most critical operations.

5.4.2 For quarantined or potentially affected facilities, produce a roster of employees, from the employee roster, who accessed the site on the date of concern.

5.4.3 To maintain critical operations, the IPSC may need to request assistance from employees in other facilities. Assess the need for complete separation of staff and shared personnel.

5.4.4 Maintain security for critical facilities and operational areas.

5.5 Phase V: Prolonged Recovery

5.5.1 Setup a process to facilitate the return of employees to work, following an illness, quarantine, or a general closure of business.

5.5.2 Each facility will work with IPSC Safety and Health to develop a process for recovery of facility to normal operations utilizing local Health Care guidance. As facilities are recovering back to normal, we will be systematically going back through the Phase-to-Phase approach recommended by their local health districts.

5.5.3 Restore security access for those employees restricted from entering company facilities during the pandemic outbreak. Assess gaps in coverage, and direct security guard forces to restore normal operating procedures.

5.5.4 Conduct major cleaning of office environment, including HVAC system, workstation surfaces, PC keyboards and mice, phones, restrooms, doors, cafeterias, and meeting rooms. Shampoo carpet. Use citrus-scented cleaning supplies to reduce employee concerns regarding the scent of chemicals.

5.5.5 Hire third party vendors to conduct a thorough cleaning of restrooms as applicable, using high pressure steam sanitizing techniques or CDC required disinfectant.

5.5.6 Replenish hand-sanitizer dispenser supplies. Keep dispensers in place.

6.0 Quarantine, Isolation, Symptoms and Return to Work

Who needs to quarantine <u>if you were exposed</u> to someone with Covid-19? (Quarantine)

CDC recommends that all individuals exposed to someone with Covid-19 test on Day 5, if possible, and if you develop symptoms get a test and stay home.

<u>You do not need to quarantine for 5 days if you:</u>

- Have been boosted
  Or

- Completed the primary series of Pfizer or Moderna vaccine within the last 6 months
  Or
- Completed the primary series of J&J vaccine within the last 2 months
  Or
- Tested positive for COVID-19 within the previous 90 days.

You do need to quarantine for 5 days if you were exposed to someone with Covid-19 if you:

- Completed the primary series of Pfizer or Moderna vaccine over 6 months ago and are not boosted
  Or
- Completed the primary series of J&J over 2 months ago and are not boosted
  Or
- Are unvaccinated

If you are caring/living with a household/family member who has been diagnosed with COVID-19 and you must quarantine because you do not meet the criteria discussed above, you will need to quarantine. You can stop quarantine and return to work under the following conditions.

- 5 days after your last contact with a household/family member who has had COVID-19 and is no longer in their isolation status.
  AND
- You have not experienced any COVID-19 symptoms during this time.

This typically is 10 days away from the workplace, based off CDC guidelines. (5 days for household member isolation + 5 days since last exposure to that individual)

Who needs to isolate if they have tested Positive for Covid-19? (Isolation)

Everyone, regardless of vaccination status.

- Stay home for 5 days
- If you have no symptoms or your symptoms are resolving after 5 days, you can leave your house.
- Continue to wear a mask around others per IPSC's current mask policy.
- If you have a fever, continue to stay home until your fever resolves.

Note: Note that these recommendations do not apply to persons with severe COVID-19 or with severely weakened immune systems (immunocompromised). CDC definition - https://www.cdc.gov/coronavirus/2019-ncov/vaccines/recommendations/immuno.html

Note: Facilities can choose to require a negative Covid-19 test for employees who have tested positive prior to coming back to the workplace depending on testing availability.

Note: Conduct a "Return to Work" Phone call with Zetta Tsukamoto (HR Manager) at (949) 297-0852 for all employees who are in Quarantine or Isolation. Zetta will communicate with facility Management on employee status.

For Persons Who have been identified as a contact with someone diagnosed with COVID-19.

What counts as close contact?

- You were within 6 feet of someone who has COVID-19 for a total of 15 minutes (Over a 24-hour period) or more regardless of if you were wearing a mask or not.
- You provided care at home to someone who is sick with COVID-19
- You had direct physical contact with the person (hugged or kissed them)
- You shared eating or drinking utensils
- They sneezed, coughed, or somehow got respiratory droplets on you

7.0 ASSOCIATED AND CORRESPONDING FORMS

Attachment 1 - Pandemic Screening Stations

Purpose

During a pandemic outbreak, to minimize the potential transmission of infectious disease in the workplace amongst essential personnel that must report to a company facility, screening stations and procedures will be implemented at the main entry points.

Mobilization

The implementation of screening stations and procedures is a Phase III strategy when human-to-human transmission of pandemic flu is reported across international borders and within the United States. The decision to implement this strategy will be made between IPSC management and Facility ownership. The Plant Manager will direct the setup and management of the screening stations at company facilities using guidance from the CDC, OSHA, and local occupational clinic or hospital.

Locations

The IPSC Management and Facility Ownership will determine which company locations must remain open during a pandemic. Screening stations will be established at the main entry point of each company facility. Security will restrict access to a single-entry point, while maintaining emergency egress routes.

Staffing

While assigning screening station staff with extensive medical training and experience may be impossible, due to the minimal resources available, the following roles should be staffed at each screening station if staff is available to provide. Recommendation below is for a facility with larger staffs. Facilities with smaller staffs will need to adjust staffing and screening station accordingly like Incident Command Response.

- Medical screener - To perform basic medical screening, and act as the lead coordinator for the screening station
- Medical clerk -To assist with screening surveys and the completion of necessary paperwork
- Security guard -To provide access control, and prohibit access for employees who fail the medical screening and/or survey
- Custodian -To assist with the stocking and replenishment of supplies, cleaning of surfaces, and safe removal of bio-hazard materials.

Supplies and Equipment

Each screening station should be equipped with the following supplies and equipment:

- (2) folding tables and (4) chairs
- (2) trashcans for disposal of bio-hazard materials
- Screening station "poster" with advisories for posting at entrance
- Large supply of survey questionnaire
- Basic supply of office supplies, including pens and notepads
- Personal protection for screening station staff
- Non-latex gloves
- N95 masks (If required employees must be fit tested for this mask)
- Hand-sanitizer
- Supply of no-touch thermometers
- Supply of custodial supplies, including trash bags, disinfectant spray, disposable wipes, etc.
- Supply of surgical masks for suspected pandemic illness victims
- Supply of medical recommendations for suspected pandemic illness victims

Screening Station Process

To check symptoms, the medical screener should first check the employee for a fever.

- Show the thermometer reading to the employee and medical screener
- Working with the medical screener, the medical clerk should then complete the appropriate forms. Based on the employee's temperature, the medical screener should continue with the screening process, and if symptoms indicate, ask the employee to leave.

ATTACHMENT 2 – Covid-19/Influenza Prevention Requirements – Updated on 12.20.21

To reduce the transmittal of the virus from person to person, the following guideline shall be utilized at all IPSC facilities. If state or local guidance are stricter than what is outlined herein, the facility shall follow the state or local guidance.

- All individuals entering facilities will be pre-screened prior to entry. Only individuals who are supporting critical business needs are permitted on site.
- Avoid close contact (Within 6 feet) of others regardless of Vaccination status.
- Face masks are required in indoors or enclosed spaces where another person or persons are present in the same space, irrespective of physical distance.
- Face masks are required outdoors where another person or persons have a likelihood of coming within 6' of the work area
- Physical distancing and Face masks will be treated with the same level of respect as other policies/practices at the facilities.
- Wash your hands often with soap and water for at least 20 seconds especially after you have been in a public place, or after blowing your nose, coughing, or sneezing.
- Increase Ventilation, Filtration, and portable air purification in all indoor or enclosed spaces. Opening of windows and doors, upgrading air handler filters to MERV 13 or higher, and utilizing portable HEPA or PECO technology in office and high-risk common areas.
- No face-to-face meetings shall take place (people within 6 feet)
- Conference calls should be used as much as possible
- Segregation of work force, such as employees' vs contractors, administrators vs. labor, control room personnel, and security. This will keep any possible future infection to spread beyond a single group of employees.
- Tasks that require two or more persons to complete:
    - Task should be reviewed by Management and postponed if feasible.
    - Additional precautions should be considered. Such as latex gloves, face shield with N95 mask, supplied breathing hood, etc.
    - Maintenance teams shall consist of 2-person teams. These teams shall not be interchangeable. Once paired up, this team shall work together for the

duration of the extended shift. Jobs shall be completed by one technician where safe and possible. N95 or KN95 masks shall be used for the teams working together.

- Workers shall set up individual workstations and shall restrict their movement to this area.

- Workers shall be responsible maintaining their worker area a "virus free" area by frequent cleaning of their area.

- All classroom training will be cancelled. Live Meeting and Web conferencing solutions should be utilized. If classroom training is required, training will need to be pre-approved.

- Rest breaks and lunch breaks should be staggered. Employees with single occupant offices should take rest breaks and lunch breaks in their office or offsite. If practical, no more than 2 employees will be allowed in the lunchroom or break area at any one time. If not practical, employees need to be at a minimum six feet apart and ventilation/filtration increased in these high-risk areas. Respiratory protection should only be removed while eating and drinking and immediately put back on.

- Only one employee allowed in smoking area at a time.

- Company/Employee/Contractor/Vendor provided meals and snacks should be individually portioned and packaged. This includes but not limited to bulk items such as nuts, unpackaged candies, buffet/family style meals, pizza parties, and multiple serving single packages.

- No company sponsored social events are allowed.

- Only one individual at a time in Restrooms, Locker Rooms, and Showers used in Locker rooms if practical. If not practical, employees need to be at a minimum six feet apart and ventilation/filtration increased in high-risk areas. Individuals should sanitize areas that they have utilized prior to another employee using.

- Minimize staffing levels. If one person can man plants during 12-hour shifts, no social meetings will occur. Shift turnover communications should be done via electronic means with no face-to-face meeting during turnover.

- Signage needs to be posted for all individuals entering facilities and in areas that would be considered high risk. (Elevators, Locker Rooms, Break Rooms, Etc.)

- Employees sharing equipment (computers, phones, etc.) with co-workers will use anti-bacterial wipes or spray to clean equipment after each use

- Those business areas with critical operations should rely extensively on telephone, email, and telephone/web conferencing capabilities

- Employees who have the capabilities to work from home should be working from home as much as possible.

ATTACHMENT 3 - Area Cleaning Guidelines

To reduce the transmittal of the virus from person to person, the following guideline should be utilized:

- Consider all areas as "virus contaminated" until cleaned by yourself
- Common Phones shall be cleaned after each use
- Consider the frequent use of gloves as an additional barrier whenever working
- Consider the lock down of certain areas of the plant to reduce the areas which must be maintained clean
- At the beginning and end of each extended shift, it is the expectation that you will clean your area of responsibility.
- Utilize the use of computer keyboard and phone covers to facilitate cleaning
- Restroom and shower facilities will be cleaned after each use

ATTACHMENT 4 - Respiratory Hygiene Guidelines

Please refer to your facilities Respiratory Protection Plan or IPSC PRO-SAP-504 Respiratory Protection for guidance.

ATTACHMENT 5 - Family Support Plan

Plant Management should ensure adequate planning considerations are put into place to allow the employee to take care of his/her family during the Pandemic.

Description	Phase 1 Alert	Phase 2 Pre-Pandemic	Phase 3 Outbreak	Phase 4 Maximum Disruption	Phase 5 Prolonged Recovery
	Pandemic possible., planning to control initial outbreaks	*Human to human outbreaks outside of USA.* *Check Resources*	*General outbreaks across national borders. Execute contingency plans.*	*General local outbreaks* *Absentee rates up to 40% last six to eight weeks*	*Weak Economy* *Basic Services limited* *Could last six months*
Employee health Status	Be sure emergency contact information is on file for all employees	Review criteria for staying away from job site due to employee being sick available sick benefits	Enforce criteria for staying away from job site and assist employees with benefits	Enforce criteria for staying away from job site and assist employees with benefits	Return to normal as resources allow
Family Health Status	Be sure family status information is up to date for all employees	Review criteria for staying away from job site due to family member being sick and available sick benefits	Enforce criteria for staying away from job site and assist employees with family benefits	Enforce criteria for staying away from job site and assist employees with family Benefits	Return to normal as resources allow

ATTACHMENT 6 – Cleaning and Disinfecting Guidelines

1.0 INSTRUCTION

Persons Presumed/Confirmed to have COVID-19 have been in the facility:

Initial Actions:

- Restrict access to areas used by the ill persons.
- Wait as long as practical, 24 hours, if possible, before beginning cleaning and disinfection to minimize the potential for exposure to respiratory droplets.
- Increase air circulation in the area if possible. Open outside doors and windows if able to do so without risking exposure to contaminated area.
- All areas affected by the ill persons should be cleaned and disinfected focusing especially on frequently touched surfaces.

Cleaning and Disinfecting Surfaces:

- For hard surfaces, wash dirty areas using a detergent or soap and water prior to disinfecting.
- Effective household disinfectants can include:
    - Diluted household bleach solutions of 1/3rd cup per gallon
    - Alcohol solutions with at least 70% alcohol
    - Most common EPA-registered household disinfectants. For a list of chemicals go to https://www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2
- For soft (porous) surfaces such as carpeted floor or rugs, remove any visible contamination if present and clean with appropriate cleaners for use on these surfaces. https://www.americanchemistry.com/Novel-Coronavirus-Fighting-Products-List.pdf

Cleaning Clothing or Other Laundry Items:

- Do not shake dirty laundry; this minimizes the possibility of dispersing the virus through the air.
- If possible, launder items using the warmest appropriate water setting for the items and dry completely. Dirty laundry that has been in contact with an ill person can be washed with other people's items.
- Clean and disinfect hampers or carts for transporting laundry according to the guidance above for hard or soft surfaces.

For instances where bodily fluids are visibly present, consult your company's blood borne pathogen procedure for further instructions.

2.0 PERSONAL PROTECTIVE EQUIPMENT (PPE)

It is important to use proper PPE while cleaning and disinfecting activities are performed.

- Cleaning staff should wear disposable gloves, suits/gowns and respirator/dust masks for all tasks in the cleaning process up to and including trash removal.
    - All PPE must be compatible with the disinfectant products being used. Consult the product's SDS for more details.
- Goggles and/or face shield may be required based on the cleaning/disinfectant products being used and whether there is a splash hazard.
- Gloves should be removed after cleaning each room or area occupied by ill persons.
- PPE should be removed carefully to avoid contamination of the wearer and the surrounding area and be placed immediately into the trash.
- It is important to wash hands thoroughly after removing gloves. For instructions on proper hand washing techniques go to: https://www.cdc.gov/handwashing/when-how-handwashing.html
- Cleaning staff should immediately report breaches in PPE (e.g., tear in gloves) or any potential exposures to their supervisor.
- A Job Safety Analysis (JSA) should be completed prior to the cleaning process to ensure all hazards are identified and all appropriate PPE is available. The IPSC COVID-19 Cleaning and Disinfecting JSA has been created and is available for reference and use.

Personnel should clean their hands often, including immediately after removing gloves and after contact with an ill person.

- Wash hands with soap and water for 20 seconds.
- If soap and water are not available and hands are not visibly dirty, an alcohol-based hand sanitizer that contains 60%-95% alcohol may be used.
- If hands are visibly dirty, always wash with soap and water.
- Follow normal preventive actions while at work and at home
    - Cleaning hands
    - Avoid touching eyes, nose or mouth with unwashed hands.
- Important times to clean hands include:
    - After blowing your nose, coughing or sneezing
    - After using the restroom
    - Before eating or preparing food
    - After contact with animals or pets
    - Before and after providing routine care for another person