Emergency Response Plan for the Trapper Solar Project, Routt County, Colorado

MAY 2024; REVISED NOVEMBER 2024

PREPARED FOR

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PREPARED BY

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EMERGENCY RESPONSE PLAN FOR THE TRAPPER SOLAR PROJECT, ROUTT COUNTY, COLORADO

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1 INTRODUCTION

This Emergency Response Plan (ERP) provides guidance to construction and field personnel on measures identified by RWE Solar Development, LLC (RWE), to mitigate risks of hazards associated with the proposed Trapper Solar Project (Project) in Routt County, Colorado. RWE is requesting a special use permit from Routt County for the Project. This ERP has been developed for the Project to address the special use permit application requirements of Section 3.1 Standards for Community- and Utility-Scale Solar Energy System of Routt County's Unified Development Code Resolution 2023-P-083 (Routt County Planning Department 2023). This plan was developed in coordination with emergency response providers, which consist of Routt County Emergency Management, West Routt Fire Protection District, and the Town of Hayden Police Department, in accordance with Occupational Safety and Health Administration standards and other applicable federal, state, and local occupational safety and health laws, regulations, and standards. It will be the responsibility of RWE and its Project contractors to comply with the measures identified in this plan.

1.1 Project Description

RWE is proposing to develop the Project, which would consist of an up to 250-megawatt (MW), alternating current, utility-scale solar energy system; an up to 125-MW (4-hour storage energy capacity) battery energy storage system (BESS); and ancillary facilities. The Project would sit on approximately 3,030 acres of private and state-owned land in Routt County, Colorado, approximately 1.5 miles south of the town of Hayden (Project area). Project components would include solar panels mounted on trackers arranged in multiple arrays, transformers, direct current to alternating current inverters, a collection system that connects the arrays to a BESS, a substation, an operations and maintenance (O&M) building, and a switchyard. Project construction activities are planned to commence in summer of 2026. The Project is planned to be in service in winter 2027 and operate for approximately 35 years.

1.2 Project Location and Access

The Project area and adjacent properties primarily consist of rangeland with some dryland farming. County Road (CR) 53 runs north to south through the eastern portion of the Project area (Figure 1). CR 61 passes through and borders the Project area to the north (see Figure 1).

The Project will be primarily accessed via U.S. Highway 40 to Poplar Street through the northern portion of the Project area (Figure 1). The Project is expected to provide electric power to the existing electric transmission grid through a new interconnection to the existing transmission lines adjacent to the southeast corner of the Project area.

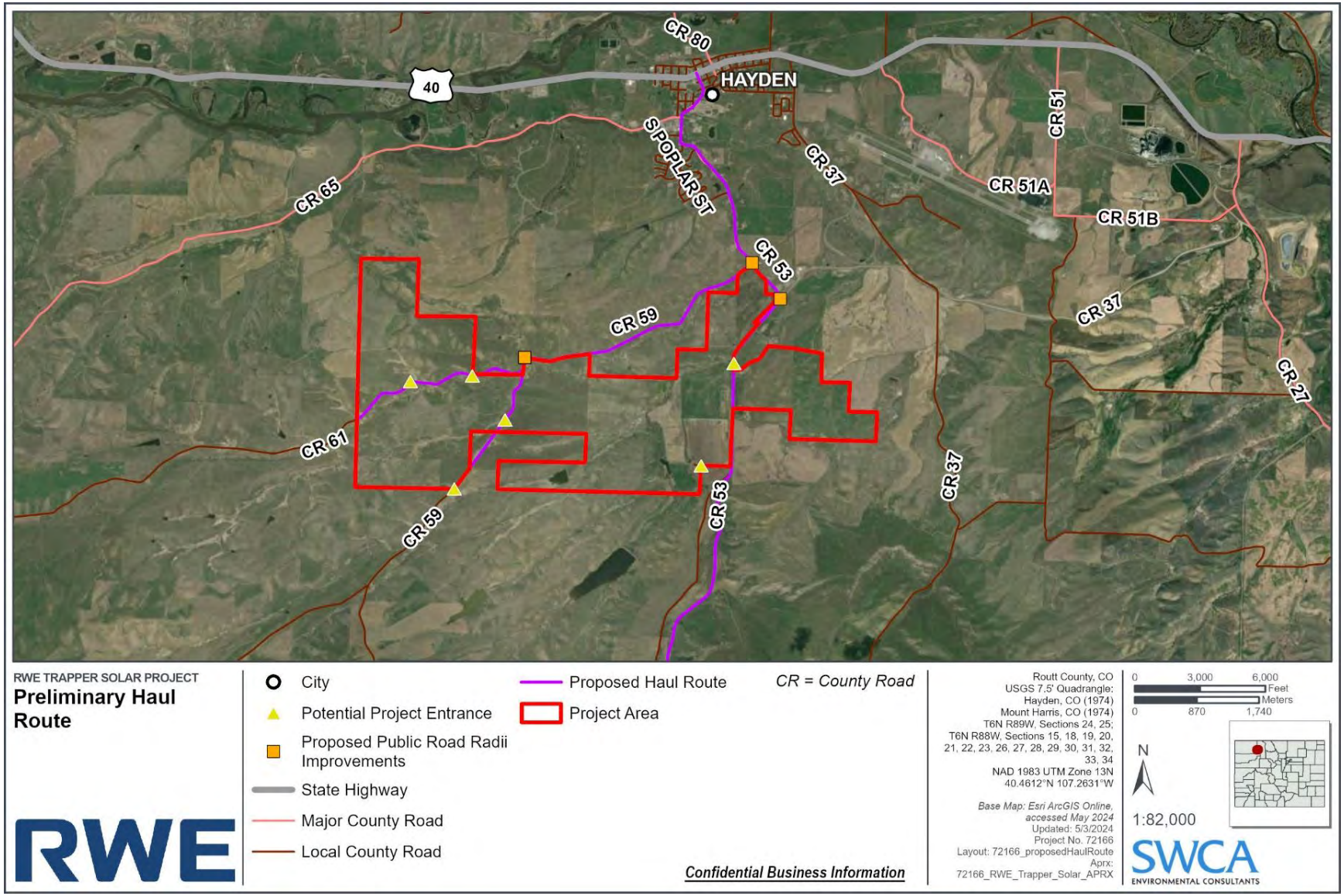

Figure 1. Proposed Project access.

1.3 Topography and Vegetation

The topography of the Project area is varied and ranges from approximately 2% to 15% slopes, with steeper slopes (> 10%) in the northwestern portion of the Project area and relatively flatter areas in the central and eastern portions of the Project area (Figure 2). Dry Creek runs through the eastern portion of the Project area from southwest to northeast. Historic and current uses of the Project area consist of row crop agriculture and grazing. The Project area is composed of pasture and hayland, inter-mountain basins semi-desert grassland, low sagebrush shrubland, and big sagebrush shrubland vegetation cover classes (SWCA Environmental Consultants [SWCA] 2024). The sagebrush vegetation communities are primarily limited to the northwestern and northeastern portions of the Project area, whereas the inter-mountain basins semi-desert grassland primarily occur in the central portion of the Project area (SWCA 2024). Pasture and hayland are intermixed throughout the Project area (SWCA 2024).

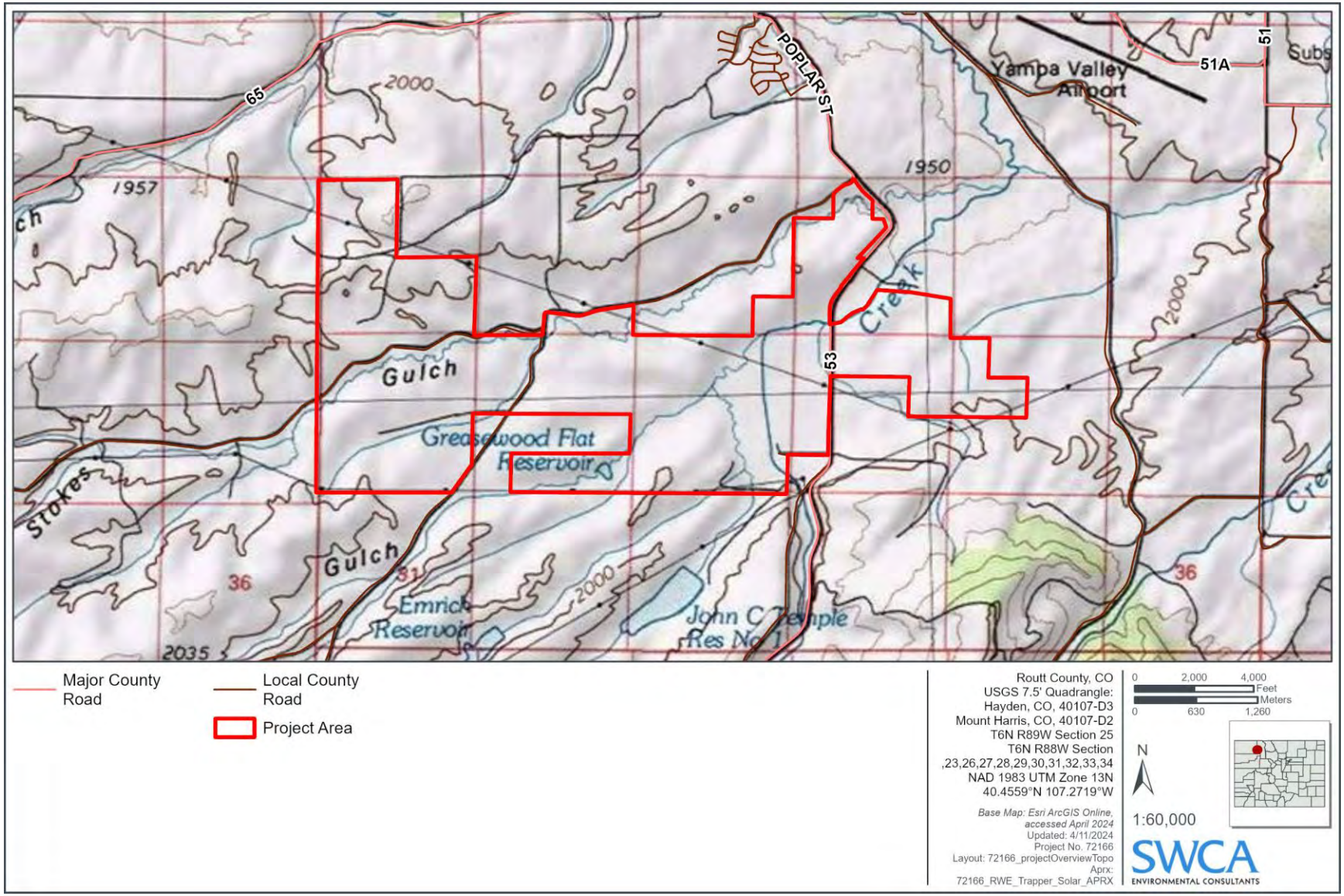

Figure 2. Topography within the Project area.

1.4 Plan Review and Development

This ERP should be reviewed and amended if there is a change in facility design, construction, operation, or maintenance that affects emergency response planning. Reviews of this ERP will be conducted by the Director of Safety, Director of Field Operations, the O&M Manager, and the Site Manager.

2 IDENTIFICATION OF POTENTIAL HAZARDS

Potential hazards within the Project area include:

- Fire (infrastructure and wildland)
- Electrical hazards
- Chemical hazards
- Severe weather
- Intrusions and security threats

2.1 Fire Hazards

This section identifies and addresses the potential ignition sources and risks within the Project area. Plant management will have clearly defined protocols and procedures for reducing fire risk and maintenance of a safe workplace from the start of the construction phase, during operations, and through the decommissioning phase of the Project.

The estimated fire risk associated with the Project is considered to be low to moderate during construction and decommissioning and low during operation.

Fire risks must be assessed based upon the potential frequency (probability of an incident occurring) and consequence (potential damage should an event occur).

2.2 Construction and Decommissioning Phase Risks

The active construction phase of the Project will result in higher potential risk for ignition as hot work, vegetation clearing, and other activities may result in flame or heat sources, which can ignite vegetation, especially if nonnative grasses have been established and cured. However, with proper clearance and maintenance of vegetation, this risk could be mitigated. The Project's construction and decommissioning phase fire risks are associated with the following:

- Earth-moving equipment: This equipment features heat sources that may create sparks and has the potential to leak fuel and hydraulic fluids.
- Chainsaws: This equipment may result in vegetation ignition from overheating, spark, or fuel leaks.
- Vehicles: Heated exhausts/catalytic converters may come in contact with vegetation and result in ignition.
- Welders: Open heat sources or metallic sparks may come into contact with vegetation or other combustible materials.

- Woodchippers: This equipment includes flammable fuels and hydraulic fluid, which may overheat and spray onto vegetation with a hose failure.
- Temporary vegetation piles: Large piles that are allowed to dry and are left on-site are a potential fuel source for both natural and construction-related fires.
- Grinders: Sparks from grinding metal components may come into contact with vegetation or other combustible materials.
- Torches: Heat sources, open flames, and the resulting heated metal shards may come in contact with vegetation or other combustible materials.
- Other human-caused accidental ignitions: Ignitions may result from discarded cigarettes and matches, temporary electrical connections, inappropriately placed generators, poor maintenance of equipment, and others.

2.3 Operations and Maintenance Phase Risks

Ignition risks are anticipated to drop considerably after the Project's active construction phase. O&M activities will occur within a defined Project footprint where adjacent fuels have been removed. The Project's O&M phase fire risks are associated with the following:

- Transformers: Transformers are subject to occasional failure, sending sparks and hot materials out in any direction; fire in a transformer may result in ignition of the oil therein.
- Capacitors: Capacitators may overheat, fail, and cause a spark, which may result in combustion of flammable materials, such as vegetation, if nearby.
- Electrical transmission lines: Energized lines may arch from adjacent vegetation such as trees, or if a tower/pole fails, it may arch on the ground, causing ignition of vegetation.
- Substations: Substations include various electrical components that may explode, fail, or ignite and include oil-cooled transformers.
- Vehicles: Heated exhausts/catalytic converters may come in contact with vegetation and result in ignition.
- Hot works equipment: Small hand power tools (gas or electric powered) may cause sparks, flames, or excessive heat, which may result in vegetation ignition.
- BESS: Excess heat caused by lithium-ion battery defects or damage could start fires or cause explosions.
- BESS: Failure of the battery management systems could cause fire.

2.4 Power Line Risks

Electrical transmission and collection lines, such as those proposed for this Project, and associated structures can start fires in a number of ways, including the following:

- Uncleared vegetation, especially trees, coming into contact with conductors.
- Sparks (from exploding hardware, such as transformers and capacitors) coming into contact with vegetation.
- Wind-blown debris coming into contact with hardware, such as transformers and conductors.

- Conductor-to-conductor contact.
- Aircraft, or attached features, such as fire-fighting water buckets, coming into contact with power line hardware and support structures.

2.5 Electrical Hazards

In addition to the potential to cause fires, some components at the solar facility have the potential to be an electrocution hazard to workers, visitors, emergency responders, and unauthorized trespassers. Exposed conductors, panel connections, and inverter switch gear can cause electrical shocks if they contact skin.

2.6 Chemical Hazards

Hazardous chemicals may be used or stored within the Project area. The spill of any chemical/oil/dangerous fluid is a potentially serious event and appropriate response actions must be taken to minimize hazards to personnel and impacts to the environment. Potential chemical hazards include the following:

- Oil release/spills
- Cleaning chemicals
- Other chemicals used on-site are to be listed in the O&M office with Safety Data Sheets

2.7 Intrusion and Security Threats

Trespassers can be a danger to staff, equipment, and themselves. Potential threats may include the following:

- Vandalism or sabotage
- Civil disturbance
- Bomb or other physical threats
- Active shooter

Procedures to address these threats should first ensure the maximum safety of site personnel and protect company property. Early understanding of the situation is important in order to contact the correct authorities and avoid anxiety and confusion.

3 RISK REDUCTION MEASURES

3.1 Fire

Key actions to reduce the risk of fire for the Project include establishing clear safety standards for the Project. During construction and operation, vegetation should be managed according to the Project's Vegetation Establishment and Management Plan, provided to Routt County under a separate cover. Proper use of equipment, including chainsaws, welders, or vehicles around or near vegetation can reduce fire risk. Adequate signage and shut off devices to stop power feed in the event of a line failure or fire in the right-of-way will help mitigate fire risk.

The following measures will be employed, as appropriate, during each phase of the Project (construction, O&M, and decommissioning) to reduce the risk of ignitions. These measures will be enforced through the Site Safety Officer (SSO) and ongoing worker safety training.

- Fire prevention rules will be posted on the Project bulletin board.
- Internal combustion engines used in the Project area will be equipped with spark arrestors that are in good working order.
- Once initial roads have been cut and initial fencing installed, light trucks and cars will be used only on roads where the roadway is cleared of vegetation. Mufflers on cars and light trucks will be maintained in good working order.
- During construction activities, the Project will be equipped with at least one water truck that will be equipped with a fast-response hose with fog nozzles. Hose size greater than 1.5 inches in diameter will require National Hose couplings.
- Pickup trucks will be equipped with first aid kits, fire extinguishers, and shovels.
- Equipment parking areas and small stationary engine sites will be cleared of extraneous flammable materials.
- The use of chainsaws, chippers, vegetation masticators, grinders, drill rigs, tractors, torches, and explosives will be restricted to outside Red-Flag Warning periods. When these tools are used, water trucks equipped with hoses, fire rakes, and axes will be easily accessible to personnel.
- A fire watch (person responsible for monitoring for ignitions) will be on-site during hot work and will remain at the Project area for up to 1 hour after completion of the hot work activities.
- No smoking will be allowed on-site except in designated safe smoking areas, which must be cleared areas with no combustible vegetation or materials. Smoking inside closed vehicles at the Project area may be allowed in designated areas away from vegetation, at the discretion of the SSO.
- The Project area will be equipped with fire extinguishers and firefighting equipment sufficient to extinguish small fires.
- Workers visiting the Project will receive training on the proper use of firefighting equipment and procedures to be followed in the event of a fire.
- On-site employees will participate in annual fire prevention and response training exercises if required and provided locally by the fire department.
- An SSO, equipped with a portable fire extinguisher and communications equipment, will perform daily patrols of the Project area during Red-Flag Warning periods.
- Remote monitoring of major electrical equipment (transformers and inverters) will screen for unusual operating conditions. Higher than normal temperatures, for example, can be considered with other operational factors to indicate the potential for overheating, which, under certain conditions, could precipitate a fire.
- Fires ignited on-site will be immediately reported to the fire department.
- Vegetation on-site, under trackers, adjacent to internal roads, and directly adjacent to the perimeter fence will be maintained in a low fuel, ignition resistant condition and will be trimmed/mowed as needed.
- Fire safety will be a component of daily tailgate meetings. Foremen will remind employees of fire safety, prevention, and emergency protocols daily.

- Combustible materials will be stored in areas away from both ignition sources and from native vegetation. Whenever combustibles are being stored in the open air, the SSO will be informed of the situation.
- Combustible waste will be disposed of in accordance with applicable laws and regulations.
- Evacuation routes will be maintained free of obstructions. Unavoidable evacuation route blockages will be coordinated such that a secondary route is identified and available.
- Adequate signage and shut off devices will be used to stop power feeding into power lines in the event of a line failure or fire in the right-of-way.

3.1.1 Hot Work

The following requirements for hot work are primarily from Colorado Fire Code (CFC) Chapter 35, Welding and other Hot Work, and National Fire Protection Association (NFPA) 51-B, Fire Prevention During Welding, Cutting and other Hot Work. Hot work is defined in the CFC as operations involving cutting, welding, thermit welding, brazing, soldering, grinding, thermal spraying, thawing pipe, and other similar operations. Hot work areas are defined as areas that are exposed to sparks, hot slag, radiant heat, or convective heat.

A Hot Work Permit that follows fire department guidelines will be obtained from the SSO for hot work, regardless of location. The SSO will require hot work to meet the requirements in NFPA 51-B and the CFC Chapter 35.

Hot work will only take place in areas designated as fire safe by the SSO and will comply with the following:

- Personnel involved in hot work will be trained in safe operation of the related equipment by the SSO. This will include providing training at *tailgate safety meetings*. Those workers will also be made aware of the risks involved and emergency procedures, such as how to notify the SSO of an issue and who is responsible for calling 911.
- Areas into which various workers may enter will require signage bearing the message “Caution; Hot Work in Progress; Stay Clear.”
- Hot work will not take place on containers that contain or have contained flammable liquids, gases, or solids until those containers have been thoroughly cleaned, purged, or inerted.
- A fire extinguisher and shovel will be readily accessible near the hot work area.
- The SSO will inspect the hot work area daily.
- Gas welding and cutting will comply with CFC Section 3505.
- Electric arc hot work will comply with CFC Section 3506.
- Piping manifolds and hose systems for fuel gases and oxygen will comply with CFC Section 3509.

Cylinder use and storage will comply with CFC Chapter 53, Compressed Gases.

- Personal protective equipment (PPE) will be selected to minimize the potential for ignition, burning, trapping hot sparks, and electric shock.
- As considered necessary by the Fire Safety Coordinator, post-work fire monitoring may be required.

- Ignitions, if they occur, will be immediately extinguished (as possible) by site personnel, and the fire department will be notified of the incident.

The SSO will be responsible for ensuring safe hot work operations and will have the authority to modify hot work activities associated with construction and/or maintenance activities and to exceed the requirements in NFPA 51-B and the CFC to the degree necessary to prevent fire ignition. Workers must be trained in the hot work information and criteria in this plan.

3.1.2 Battery Energy Storage Systems Risk Reduction

Potential hazards related to BESS are primarily associated with the possibility of thermal runaway occurring from a malfunctioning or damaged battery. Newer battery technologies have minimized the occurrence of thermal runaway through a system of protections, including internal cell monitoring and partitioning, container design and features, ventilation and air conditioning systems.

The Project's BESS will include self-contained container units. The Project will use battery storage systems that are NFPA Standard 855–compliant, are Underwriters Laboratories certified, and include built-in failsafe and cooling systems designed to prevent thermal runaway and the spread of fire. Under normal operations, BESS facilities do not contain, store, or generate hazardous materials in quantities that would represent a risk to off-site receptors. In addition, the Project's preventative measures and fire and safety systems make an accident condition very rare. Nevertheless, because BESS facilities do store energy, a battery thermal runaway can occur if the temperature in a cell or an area within a cell rises due to thermal failure, mechanical failure, or internal/external short circuiting. The battery storage system to be used in this project has been tested following UL 9540A, a test method developed by Underwriters Laboratories to address safety concerns identified by the building codes and the fire service in the United States. The UL 9540A test results help both BESS manufactures and code authorities to understand the impact of battery thermal runaway to the built environment and any fire protection mitigation required to contain an event.

The Project must meet industry standards for adequate separations, cascading protections, and suppression systems to limit failure to a single battery container. BESS must use an energy management system for 24/7 monitoring, management, and balancing of cell voltages, currents, and temperatures to ensure every cell remains within its safe operating parameters. The system must transmit an alarm signal if potentially hazardous temperatures or other conditions, such as short circuits, over voltage, or under voltage, are detected. This system is capable of controlling and isolating individual BESS container from the rest of the system both remotely and manually.

The Project will feature a pre-engineered BESS equipped with integrated operational management systems, fire safety, and thermal management systems, such as HVAC, ventilation, gas, heat and smoke detection and alarms, and fire suppression systems. In addition to the many individual standards referenced, a failure mode and effects analysis must be performed for each system and requires a test to ensure safe compatibility of the system's parts.

The proposed batteries and containers will also include the following important monitoring and safety components:

- Modular battery racks designed for ease of maintenance
- An integrated fire detection and suppression system
- An integrated thermal management system
- An integrated battery management system

The fire detection system will be connected to a fire alarm and control panel within each container, which can then be connected to a site-level fire control center.

3.2 Severe Weather Monitoring and Evacuation Protocols

3.2.1 Wildfires

Wildfires are uncontrolled fires that burn in wildland vegetation, often in rural areas. Wildfires can ignite from natural occurrences and human-generated sources. They may begin unnoticed, spread quickly, and are often signaled by dense smoke that may be visible for miles around. A combination of weather conditions, fuel availability, topography, temperatures, and rainfall often determine the severity and growth of wildfires. Drought conditions contribute to the likelihood of wildfire outbreaks, particularly in the summer months. During periods of high fire danger, potential sources of fire ignition (vehicle exhaust systems, cigarettes, matches, propane torches, sparks from hot work operations, etc.) must be used with extra precaution.

In the event of a wildfire, the following procedures will apply:

- Remain alert to signs of wildfire in your immediate area and maintain awareness of changes in the direction of wind or smoke.
- Determine the relative location and size of the fire and take immediate action as appropriate.
- Alert the Plant Manager.
- Follow the Emergency Response Protocol.
- Evacuate and/or go to the designated assembly area.
- Protect yourself from smoke. Cover your nose and mouth with a facemask, cloth, buff, or scarf. If in a vehicle, roll-up windows and close air vents. Drive slowly with headlights on. Watch for other vehicles and pedestrians. Do not drive through areas of heavy smoke.
- Stay tuned to local news, emergency alert systems, weather forecasts and updates for the latest statements, watches, and warnings.
- Do not try to outrun the fire; wildfires can move at speeds of up to 20 miles per hour.
- Do not re-enter the site until given approval by the Plant Manager.

Following wildfire events, facility equipment will be evaluated for damage, and repairs will be performed under standard operational procedures.

3.2.2 Flooding and Flash Flood

Flash flooding is the result of heavy localized rainfall, such as that from slow moving, intense thunderstorms. Flash flood often results from small creeks and streams overflowing during heavy rainfall. These floods often become raging torrents of water, which rip through riverbeds or canyons, sweeping everything with them. Flash flooding can occur within 30 minutes to 6 hours of a heavy rain event. In hilly terrain, flash floods can strike with little to no advance warning. Distant rain may be channeled into gullies and ravines causing flash flooding in minutes. In the event of a flash flood, the following procedures shall apply:

- During periods of thunderstorms, remain alert to heavy rains in your immediate area or upstream from your location. It does not have to be raining at your location for flash flooding to occur.

- Do not drive through flooded areas, even if it looks shallow enough to cross.
- Do not cross flowing streams on foot where water is above your ankles.
- Be especially cautions at night. It is harder to recognize water danger then.
- Do not attempt to outrace a flood on foot. If you see or hear it coming, move to higher ground immediately.
- Be familiar with the land features where you work. It may be in a low area, near a drainage ditch, or small stream.
- Stay tuned to weather forecasts and updates for the latest statements, watches, and warnings concerning heavy rain and flash flooding.
- Waiting 15 to 30 minutes, or until high water recedes, is a simple safety measure.

Following flood events, facility equipment will be evaluated by the SSO for damage. Repairs will be performed under standard operational procedures.

3.2.3 Tornado

Upon the issuance of a tornado warning, site personnel will evacuate the site and report to the pre-designated shelter area. In the event site personnel are outside and unable to evacuate to the shelter, the following procedures will be followed:

- Lie flat in a nearby ditch or depression, covering the head with the hands. Be aware of the potential for flooding.
- It is safest to leave a vehicle for safe shelter.
- Beware of flying debris.

Following tornado or high wind events, facility equipment will be evaluated by the SSO for damage. Repairs will be performed under standard operational procedures.

3.2.4 Lightning Storm

In the event a lightning storm is within 10 to 30 miles and approaching the Project area, the following procedures will apply:

- Notify the SSO and on-site employees.
- If lightning approaches within 5 miles, stop work and get in and stay in company or personal vehicles that have rubber tires.

Remain in vehicles for at least 30 minutes depending on passing storm severity and wait for an *OK* from the SSO in charge for monitoring the storm.

Lighting can be a source of fire both within the Project area and the area surrounding. Areas of lighting strike should be monitored for signs of ignition.

3.2.5 Snowstorm

Before winter approaches, the SSO will ensure adequate supplies, including:

- Sand to improve traction.
- Snow shovels and other snow removal equipment.
- As needed, service agreement(s) with snow removal vendors.

When winter weather threats exist, the SSO will monitor local news channels for critical information from the National Weather Service to stay alert to changing weather conditions. Winter storm watches, warnings, and advisories are issued by local National Weather Service Forecast offices.

Extreme and fluctuating weather conditions, including high humidity, freezing temperatures, and ice storms, can cause ice to form on power lines. Ice weight can put a lot of stress on power lines and damage equipment. Snow, rain, or freezing rain can also create conditions to start pole fires. In the event of damaged poles or ice on power lines, the SSO will notify the site owner. If site personnel notice excessive ice build-up on a section on lines or downed lines, they will notify the SSO and take the following precautions:

- Stay clear of low or sagging lines and remember that travelling under these lines can be dangerous.
- Treat downed line as though it is energized and keep others away.
- Do not get out of your vehicle if it accidentally contacts a downed line. If it is safe to do so, back slowly away from the line or wait for help to arrive.

Depending on the severity of the winter storm, the site may be closed.

3.2.6 Earthquakes

Earthquakes may strike with little to no advance warning. As such, when an earthquake does occur, it is important to stay as safe as possible. Some earthquakes are fore-shocks, and a larger earthquake may subsequently occur. Many earthquakes are accompanied by aftershocks after the main event has occurred. If an earthquake occurs, personnel movements should be minimized to a few steps to a nearby safe place, and, if indoors, personnel should remain there until the shaking has stopped, and they are sure exiting is safe.

The following actions should be followed for personnel indoors:

- Drop to the ground and take cover by getting under a sturdy piece of furniture and hold on until the shaking stops. If there is not a desk or sturdy piece of furniture near you, cover your face and head with your arms, and crouch in an inside corner of the building.
- Stay away from glass, windows, outside doors and walls, and anything that could fall, such as lighting fixtures or furniture.
- Use a doorway for shelter only if it is near you and you know it is a strongly supported load bearing doorway.
- Stay inside until the shaking stops, and it is safe to go outside.

The following actions should be taken by personnel outdoors:

- If you are already outdoors, stay there.
- Move away from buildings, structures, light poles, and utility wires.

Once in the open, stay there until the shaking stops to prevent being hit by falling debris. Following seismic events, facility equipment will be evaluated by the SSO for damage, and repairs will be performed under standard operational procedures.

3.3 Intrusion and Security Threats

Any suspicious persons or activity observed should be reported immediately to the Routt County dispatch center. It is strongly advised against an employee confronting suspicious activity in or around the site due to safety reasons. The SSO or designee will meet the emergency response team and coordinate next steps. Stay inside or off-site until it has been declared to go outside, or return to the site.

Any bomb threats should be immediately reported to the nearest bomb squad and communicated to local police.

4 EMERGENCY RESPONSE PROCEDURES

This ERP applies only to emergency actions to be taken in the Project area. After an evacuation, personnel will be governed by emergency plans of their respective agencies and/or local government authorities.

In reporting fires and other emergencies, the first call should be to 9-1-1 so that the appropriate apparatus can be dispatched. To facilitate the arrival of fire services during construction, an emergency response meeting point will be established. The SSO or designee will meet the emergency response team to lead them into the Project area.

4.1 Roles and Responsibilities

Employees should know how to prevent and respond to fires and are responsible for adhering to company policy regarding fire emergencies. The following sections detail general responsibilities by position.

4.1.1 Project Owner/Management

The Project owners/management are responsible for implementing necessary measures to reduce fire risk and comply with federal, state, and local fire safety/protection policies. Additionally, Project owners/management are responsible for making necessary training and equipment available to provide a safe working environment for employees and contractors.

4.1.2 Plant Manager

The Plant Manager will be responsible for the following:

- Directs occupants to the prescribed evacuation routes and notifies the remote operation center of actions and updates.
- Ensures that personnel know the evacuation procedures.
- Directs an orderly flow of personnel during drills and actual emergencies and reports to the remote operation center when their site has been evacuated completely.
- Ensures that information notices are issued to field personnel, the owner representative, and asset managers.

4.1.3 Remote Operation Center

The Remote Operation Center will be responsible for the following:

- Initiating action deemed necessary by the Plant Manager in an emergency.
- Ensuring that information notices are issued to field personnel, the owner representative, and asset managers.

4.1.4 Site Safety Officer

The SSO will manage the ERP for the Project and will maintain records pertaining to the ERP. The SSO is also responsible for the following:

- Understanding the ERP and its mandates for training, fire prevention, fire suppression, and evacuation.
- Understanding the risk associated with the Project and with activities that will occur within the Project area.
- Developing and administering the risk prevention and safety training program.
- Ensuring that fire control equipment and systems are properly maintained and in good working condition.
- Monitoring combustibles on-site and managing where they are stored.
- Conducting safety surveys and making recommendations to the site manager.
- Stopping Project work activities that pose a hazard or are not in compliance with this ERP.
- Reporting fires ignited in the Project area—whether structural, vegetation, electrical, or other—to the fire department.

4.1.5 Supervisors

Supervisors are responsible for the following:

- Ensuring that employees receive appropriate fire safety training.
- Notifying the SSO when changes in operation increase the risk of fire.
- Enforcing fire prevention and protection policies.
- Accounting for employees/contractors in the case of an evacuation.
- Performing Project area sweeps to round up staff in the case of an evacuation.
- Facilitating fire agency access to the Project area.
- Cooperating with the fire agencies during and following fires.
- Identifying unsafe work practices that may lead to fire ignitions and correcting those practices in coordination with the SSO, as appropriate.

4.1.6 Employees/Contractors

Employees and contractors are responsible for the following:

- Completing required training before working in Project area without supervision.
- Conducting operations safely to limit the risk of fire.
- Reporting potential fire hazards to their supervisors.
- Following fire emergency procedures.
- Understanding the emergency evacuation protocols.

4.2 Contact Information

The personnel listed in Table 1 are the primary site contacts to be notified during an emergency.

Table 1. Primary On-Site Emergency Notification Contacts

Name	Position	Telephone Number
To be determined (TBD)	SSO	TBD
TBD	Plant Manager	TBD
TBD	Construction Supervisor	TBD

Table 2 is a list of emergency-related contacts near the Project area.

Table 2. Emergency-Related Contacts near the Project Area

Emergency Service	Contact	Telephone Number
Fire/Emergency Medical	West Routt Fire Prevention District	(970) 276-3796
Ambulance	Routt County Emergency Medical Service	(970) 870-5551
Routt County Sheriff	Sheriff Doug Scherar	(970) 870-5502
Hayden Police	Routt County Communications – (non-emergency) Dispatch	(970) 879-1090
Bomb Squad	Jefferson County Sherriff's office	(303) 271-0211
Craig Police	Dispatch	(970) 824-6501
Grand Junction Police	Dispatch	(970) 242-6707
Colorado State Patrol	Major David Rollins	(970) 858-2250
Hospital	Memorial Regional Hospital	(970) 824-9411
Colorado Occupational Safety and Health Administration	Denver Area Office	(303) 844-5285

4.3 Training and Drills

4.3.1 Training

Employees or contractors visiting the Project area will have access to and receive training on this ERP whenever it is modified or at least on an annual basis. Employees will also be trained when this ERP is initially implemented. Contractors and visitors who enter operating areas of the Project area will be

trained on evacuation procedures before they enter for the first time and at least annually thereafter. A list of contractors with current training on this ERP will be maintained at the construction trailer during construction and at the O&M building, once built, for reference purposes. Employees and contractors will be provided with and use the required PPE based on the expected hazards of their work.

4.3.2 Evacuation Drills

Evacuation test drills will be performed at least twice a year. The Plant Manager will coordinate these test drills.

4.4 Communication Protocols

4.4.1 Incident Reporting

Prompt and accurate reporting and investigation of work-related incidents, which include injuries, illnesses, and near misses, or accidents that could have caused serious injuries, is a necessary component of effective accident prevention programs. This information can be used in evaluating and preventing hazards, fulfilling mandatory recordkeeping requirements, and filing for workers' compensation benefits. Incidents resulting in personal injury and/or illness require that the appropriate Office of Worker's Compensation Programs and Department of Labor procedures are followed, and forms are completed.

The Plant Manager is the primary point of contact for planned and unplanned outages. The Plant Manager will notify required parties, including the operation centers of utilities and asset management/owners, and field personnel via email for organized record keeping. Field personnel will be copied for informational purposes and seamless communication. Communication will be directed towards the Plant Manager unless the Plant Manager defers to a specific field supervisor/technician. The same protocol will be followed for reporting updates, including the root cause of an outage.

Emergencies, especially ones that involve property damage, will be reported as soon as possible to the Plant Manager. This includes both O&M personnel and temporary construction personnel during the construction and decommissioning phases. The Plant Manager will notify personnel of the situation and request dispatch, which may include requesting photographs that document the damage. Each facility or work area will maintain their own recordkeeping forms for injures/illnesses.

4.4.2 Emergency Notification Procedures

An emergency at or near the Project area will trigger the emergency notification procedures identified in this section. The first call should be to 9-1-1, so that appropriate authorities can be notified and appropriate apparatus and personnel dispatched. Travel times to the Project area require notification of 9-1-1 as early as possible after a fire or other emergency has been observed. Emergency reporting is critical for tracking where, when, how, and why fire ignitions or other emergencies occur and will help the fire agencies develop protocols for reducing their occurrence.

Personnel that will be the primary point of contact to be notified during a fire emergency will be provided by the general contractor during construction and decommissioning and the O&M services contractor during operation. Personnel contact information will include on-site Project team members and additional on-site personnel.

4.4.3 Evacuation Communication Protocol

In the event that field personnel must travel out of the immediate area to seek refuge and/or may lose the ability to access the site's Supervisory Control and Data Acquisition system (loss of power, cell service, or internet), the Plant Manager will hand off the primary point of contact and site operator role to the remote operation center.

4.5 Fire Suppression Methods and Equipment

Fire extinguishers will be in on-site vehicles and at the O&M building.

The SSO (or trained specialist, when necessary) will ensure that fire suppression and related equipment is maintained according to manufacturers' specifications. NFPA guidelines will be implemented for specific equipment.

The following equipment will be subject to ongoing maintenance, inspection, and testing procedures:

- Portable fire extinguishers
- Fire alarm systems
- Water trucks and associated equipment
- Emergency backup generators/systems and the equipment they support

4.5.1 BESS Emergency Response

In the event of a fire, explosion, release of vapors, or other hazardous situation involving the BESS, the following protocol will apply:

- Personnel will stop work and notify the SSO.
- Access to the affected area will be prohibited by establishing a perimeter of 100 feet (or more to stay upwind of smoke and off-gassing) around the BESS.
- The SSO will document the GPS coordinates of the affected area, notify the plant manager, and initiate emergency shutdown of the BESS. Keep in mind that even after the BESS is shut down it will still have stored energy that represents an electric shock hazard to those close to it.
- If there is a threat or potential threat to life or safety, 9-1-1 will be contacted to dispatch the appropriate emergency responders. Hazards observed should be reported to emergency responders.
- The SSO will direct safety responders toward the affected area. The SSO will remain at a safe distance from the affected area.
- Personnel will remain at the designated assembly point until directed otherwise.

4.6 Electrical Hazard Lockout Procedures

Electrical hazard lockout procedures will consist of the following:

- Provide adequate signage and shut off devices to stop power feed into power lines in the event of a line failure or fire.
- Remote monitoring of major electrical equipment (transformers and inverters) will screen for unusual operating conditions. Higher than normal temperatures, for example, can be considered with other operational factors to indicate the potential for overheating, which, under certain conditions, could precipitate a fire.

4.7 Chemical Hazard Spill Response Procedures

To minimize chemical hazard risks, the following procedures will be followed:

- Usage of proper PPE when handling chemicals.
- Maintenance and accessibility of Safety Data Sheets in the office.
- Proper storage of chemicals, such that incompatible (i.e., chemically reactive) substances are separated appropriately and hazardous materials are stored in locked, fire-resistant cabinets.
- Spill-control kits should be kept near wherever chemicals are stored.

On-site personnel will be trained in the proper use of clean-up materials.

4.8 Intrusion Detection and Response Procedures

The site manager and police will be informed immediately if suspicious vehicles or persons access the Project area without proper credentials. The following procedures will be set in place to minimize the occurrence of contact between staff and intruders:

- Security fence equipped with appropriate signage warning the public of high voltage will be utilized where necessary.
- Security fencing and gates will be regularly inspected.
- Contact with authorities will occur in the event of an unauthorized trespasser.
- Bomb or other physical threats will be reported to the site supervisor immediately and contact made with the local police.

4.9 Evacuation Plan

During significant emergency situations at or near the Project area, the Plant Manager, in consultation with law and/or fire authorities may issue an evacuation notice. When an evacuation has been called, on-site employees will gather at the designated assembly area. The Plant Manager will account for personnel. Once employees are accounted for, they will safely travel from the Project area to safe zones, which are generally areas off-site away from the threat. Supervisors and the SSO will perform a sweep of the facility to locate persons and reconvene at the designated assembly area. Once personnel are accounted for, they will exit the site.

The primary evacuation route will be north on either CR 53 (for the eastern portion of the site) or northeast on CR 59 (for the western portion) until they converge at South Poplar Street and continue along on South Poplar Street north to Hayden. Secondary evacuation routes will be south on CR 53 or southwest on CR 59 or CR 61 (see Figure 1).

4.10 First Aid and Medical Assistance Resources and Equipment

First aid kits will be stored on-site vehicles and the O&M building.

5 LITERATURE CITED

Routt County Planning Department. 2023. *Adoption of Renewable Energy Section of the Unified Development Code*. Available at: https://static1.squarespace.com/static/5dbc618a870143633283bbe0/t/657b21b561cca663bb8c55f7/1702568374104/850135.pdf. Accessed April 2024.

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