CSOLAR IV WEST, LLC

14302 FNB Parkway
Omaha, Nebraska 68154
402-691-9500
www.tenaska.com

June 13, 2025

Emmanual Salas
California Public Utilities Commission
Via Email: Emmanual.Salas@cpuc.ca.gov

Mr. Salas,

Imperial Solar Energy Center (ISEC) West appreciates the opportunity to respond to the Generation Audit of Imperial Solar Energy Center West, Audit Number GA2024-10IS and has prepared the attached Corrective Action Plan (CAP) to address the alleged violations (findings) identified by California Public Utilities Commission (CPUC), Electric Safety and Reliability Branch (ESRB) auditors during their site visits to the facility February 25 – 27, 2025.

Since the CPUC site visits, ISEC West has been diligently working to address the findings. Per the direction of CPUC, the CAP has been prepared in a tabular format that is designed to include the completion date or the projected completion date for each finding identified in the audit report. Additionally, documentation supporting the completion of the findings, if applicable, is attached to the CAP.

ISEC West is committed to continued compliance with General Order (GO) 167-C.

If you have any questions regarding this submittal, please do not hesitate to contact me at (402)-968-1181 or DHermance@TENASKA.com.

Best regards,

CSOLAR IV WEST, LLC
A Delaware Limited Liability Company

David Hermance
Environmental, Health, & Safety Manager, Tenaska

Enclosure

Cc: Buck Hunt, Vice President, Tenaska
Ben Wilton, Senior Director, Operations Compliance, Tenaska
Megan Winchell, Sr. Vice President QHSE, NovaSource Power Services
Luis Carlos, CA Regional Director, NovaSource Power Services
Samuel Arevalo, Plant Manager, NovaSource Power Services

ISEC West Corrective Action Plan

Finding	Description	Corrective Action	Status	Completion Date	Projected Completion Date	Documents
1	Two exhaust fans serving the Dunaway switchyard battery rooms lack a method of functional testing to verify operational status. Exhaust fans in battery rooms are critical for ventilating potentially hazardous gases, such as hydrogen, that may be released during battery charging. Without a means to confirm that these fans are operating as intended, there is an increased risk of gas accumulation, which could lead to fire or explosion hazards. ISECW must develop and implement a method and procedure to regularly test the functionality of the battery room exhaust fans and ensure the results are documented. ISECW must submit the testing method, procedure, and evidence of initial testing to ESRB for review and verification.	Two (2) hydrogen gas monitors (model: HGD-DR-AC) used to initiate ventilation of accumulated gas hazards in the two (2) battery rooms (Battery Rooms #1 & #2) in the Dunaway Switchyard have been replaced by newer units. These monitors will be inspected and tested for functionality via use of test function on the unit monthly during the monthly inspections of the batteries.	Complete	5/3/2025	Not Applicable	• HGD-DR-AC Specifications • MP.812510.6 Vented Lead-Acid Battery System Maintenance (See Task 1.8)
2	ISECW personnel are not completing job briefing forms for every job. When job briefing forms are completed, they are not consistently stored for recordkeeping purposes. According to ISECW procedures, ISECW must complete job briefing forms for every job and for each day of the job if the work spans over multiple days. Job briefings are a critical step to ensure that Plant staff and all personnel involved are aware of all associated risks and prepared to perform the work safely. ISECW must ensure that job briefings are completed daily and that records of these briefings are properly retained. ISECW personnel must also review JHA's each day that qualifying work continues, as part of the daily job briefing process. ISECW must ensure that a JHA is developed for all applicable work and that it is reviewed and documented during the pre-work job briefing.	ISEC West is addressing this finding in two steps: Step 1: ISEC West will re-train O&M personnel to ensure that pre-job briefings are completed for every job and conducted each day that work is being done. This step is an interim step that is scheduled to be completed by 6/30/2025. Step 2: The Operator (NovaSource Power Services, "NSPS") is adopting the use of a Job briefing/JHA/Work Order system named Vyntelligence. In this system, the job briefings become part of the work order system that is tied to personnel hourly tracking (i.e., pay system).	Complete --- In Process	6/12/2025 --- Not Applicable	Not Applicable --- 9/15/2025	• Refresher Training Sign-off Sheet
3	ISECW poorly documents emergency drills and does not document critical elements of the drills. Specifically, the documentation lacks sign-in sheets to verify employee participation and fails to include post-drill debriefs. These deficiencies hinder the ability to confirm that all personnel are receiving emergency preparedness training and prevent a meaningful evaluation of emergency drill effectiveness. ISECW must ensure that it thoroughly documents all emergency drills, including a complete participant sign-in sheet and a formal debrief that identifies any deficiencies and outlines the corrective actions taken.	The GAO developed and provided the Operator the ISEC West Emergency Drill Documentation to facilitate this expectation. The most recent drill was conducted on 6/11/2025 and the completed documentation is attached.	Complete	6/2/2025	6/11/2025	• ISEC West Emergency Drill Documentation
4	ESRB inspected ISECW's company-issued vehicles and found that ISECW did not equip them with AEDs. According to Section 3.4.5 of the Emergency Response Plan and Section 21.2.1 of the Environmental Health & Safety Manual, ISEC shall keep AEDs in manned office buildings and in each field worker's company issued vehicle. ISECW must equip all company-issued field vehicles with AEDs and ensure that all work vehicles are consistently outfitted with the required safety equipment. ISECW must provide photographic documentation confirming that all company-issued vehicles have been equipped with AEDs to ESRB for review.	The Operator has provided AEDs for all company issued work trucks that are assigned to ISEC West.	Complete	5/27/2025	Not Applicable	• Photograph of AED in all company-issued work trucks assigned to ISEC West.
5	ISECW does not have a comprehensive list of all confined spaces located on their premises. Section 6.2.2.2 of the Confined Space Entry Procedure states that ISECW must maintain a list of all active confined spaces throughout the Plant in the Confined Space Entry Logbook. ISECW must create and maintain a list of all active confined spaces throughout the Plant and submit it to ESRB for review.	NSPS (i.e., the Operator) has prepared a comprehensive list of all confined spaces.	Complete	4/29/2025	Not Applicable	• ISEC West Confined Spaces List
6	Plant does not have records of annual SP001 aboveground storage tank inspections for previous years, as required by section 6.2 Integrity Testing of the Spill Prevention Control and Countermeasure Plan (SPCC). The ISECW team conducted the 2025 SP001 during the time of the site visit, but ISECW was not able to provide documentation for prior annual inspections. Moving forward, ISECW must ensure that personnel perform SP001 inspections annually and that records are maintained and readily accessible for review.	NSPS personnel completed the STI SP001 Annual Inspection of the 298-gallon, sub-base, fuel tank for the emergency generator located within the Dunaway Switchyard. Please see attached. The STI SP001 Annual inspection was added to the SPCC Plan in 2024 as a revision to the SPCC Plan. The inspection conducted on February 26, 2025 was the first annual inspection conducted, and subsequent annual inspections will be conducted in accordance with the SPCC Plan.	Complete	2/26/2025	Not Applicable	• STI SP001 Annual Inspection Checklist
7	Section 17.1 of the EAP states the EAP must be reviewed annually. However, the current version of the EAP does not include a mechanism to verify that ISECW is conducting these annual EAP reviews. Without a documented sign-off process, there is no way to confirm compliance with the annual review requirement. ISECW must update the EAP to include an annual review sign-off sheet to ensure accountability and facilitate verification of compliance during future inspections. ISECW must submit the updated EAP with the sign-off sheet to ESRB for review.	The Operator, NSPS, maintains an Emergency Action Plan (EAP) applicable to all of the solar facilities that they are contracted to operate. That EAP was recently reviewed at the NSPS corporate level (see attached). NSPS has committed to reviewing the EAP annually moving forward. The appendices of the EAP, including the Emergency Contact List and Site Maps, are site-specific, and these documents are reviewed and updated at the time changes are made to facility personnel and/or changes to the facility are made.	Complete	6/6/2025	Not Applicable	• Current EAP for NSPS Operated Facilities • Current Contact List • Current Site Maps (1 & 2)

ISEC West Corrective Action Plan

Finding	Description	Corrective Action	Status	Completion Date	Projected Completion Date	Documents
8	ISECW's Confined Space Procedure and NERC CIP-003 - Low Impact Compliance Plan state that ISECW must conduct an annual review of the documents to ensure the accuracy of the information contained in each plan. However, the attached logs indicate that ISECW has not performed these reviews in over a year. ISECW must follow its procedures by keeping all plans accurate, up to date, and properly maintained. ISECW must review both the Confined Space Procedure and the NERC CIP-003 Low Impact Compliance Plan annually, and ISECW must update the associated review logs to reflect completion of the review. ISECW must submit updated review logs and confirmation of completed document reviews to ESRB for verification.	NSPS replaced NERC CIP-003 on April 9, 2025 with NSPS CIP-003 Low Impact Compliance Policy. The policy page providing document control/document history information for the new CIP-003 Policy including it's approval date is attached. --- The Confined Space Procedure is scheduled for NSPS review by June 30, 2025.	Complete --- In Process	4/9/2025 --- Not Applicable	Not Applicable --- 6/30/2025	• NSPS CIP-003 Low Impact Compliance Policy
9	Several completed work orders lacked details pertaining to the work being performed. ISECW must consolidate all relevant details and information on completed work orders in the work order management system to ensure that the information related to the completed work is properly documented and stored. Moving forward, ISECW must ensure that work orders include clear, detailed descriptions of the work performed and all pertinent information related to the task.	The Operator conducted training for O&M personnel on the expectation of Work Order detail.	Complete	6/12/2025	Not Applicable	• Refresher Training Sign-off Sheet
10	ISECW does not maintain employee training records in a centralized database. Some of the employee training records that ISECW provided were outdated or indicated expired certifications, despite Plant staff possessing valid certification cards. The decentralized and inconsistent state of training documentation makes it difficult to verify compliance and track training status across personnel. Proper training record management is essential for maintaining workforce qualifications and ensuring regulatory compliance. ISECW must establish a centralized system for managing and storing all training records to ensure timely tracking, verification, and accessibility of up-to-date certifications. ISECW must submit the proposed method for centralizing training records along with a timeline for implementation to ESRB for review.	The Operator has implemented use of a ShareFile location to store and archive all employee training and certification records.	Complete	3/1/2025	Not Applicable	• Share File Screen Shots
11	ESRB inspectors identified deficiencies in the tracking and management of contractor employee training records and certification status. Specifically, ISECW submitted expired certifications for a Hampton Tedder employee, with no confirmation of whether the individual is still employed by the contractor or currently working on-site. If the individual is no longer with the contractor, ISECW must properly archive the outdated records and exclude them from active documentation. Submitting expired or irrelevant certifications creates confusion and undermines efforts to verify compliance. ISECW must implement a process to ensure that they regularly review contractor records, archive outdated records, and only provide current certifications for active personnel during audits. ISECW must submit a plan to ESRB outlining how it will review and manage contractor training records going forward, including how outdated records will be archived and how current certifications for active personnel will be tracked and provided, along with a timeline for implementation.	The Operator, NSPS, contracts with ISNetworld® (ISN). ISN is a third-party system that verifies contractor's safety, procurement, regulatory, and quality data including certification status for specified work. The Plan: The ISEC West Plant Manager will use INS (or a similarly effective 3rd-party resource) for all contractors who will perform work at ISEC West moving forward.	In-Process	Not Applicable	6/30/2025	
12	During the documentation review, ESRB inspectors found that ISECW personnel do not document periodic spot checks of subcontractor work as required by section 5.4 of the Subcontractor Management Program. Regular oversight of subcontractor activities is essential to ensure compliance with safety procedures and work quality standards. The absence of documented spot checks limits accountability and may lead to lapses in safe work practices. ISECW must implement and document periodic spot checks on subcontractor work. ISECW must maintain documentation of spot checks and ensure they are available for review.	NSPS routinely spot checks contractor work, and in most cases, accompanies contractors onsite during the contractor work. NSPS developed and has implemented the use of a contractor spot check form to document spot checks of contractor work. Completed forms will be maintained onsite for 1 year after the contracted service.	Complete	6/2/2025	Not Applicable	• ISEC West Contractor Spot Check Form

ISEC West Corrective Action Plan

Finding	Description	Corrective Action	Status	Completion Date	Projected Completion Date	Documents
13	During the site inspection, ESRB inspectors observed that NFPA hazard diamond placards were not posted at the front gate of the Plant or at the front gate of the Dunaway switchyard. The absence of these placards represents a potential safety and emergency response concern, as NFPA hazard diamonds provide critical information to first responders regarding flammability, health, and reactivity hazards present on-site. Without proper hazard identification signage, emergency personnel may lack the necessary information to respond safely and effectively in the event of an incident. ISECW must install clearly visible NFPA hazard diamond placards at all primary points of entry, including the front gates of the Plant and the switchyard. Additionally, ESRB inspectors noted the absence of high voltage warning signage around the fencing of the Dunaway switchyard. The absence of high voltage signage poses a safety hazard by failing to warn personnel and visitors of the presence of energized equipment within the switchyard. Clear and visible high voltage signage is necessary to help mitigate unauthorized access and reduce the risk of electrical injury or fatality. ISECW must install high voltage warning signs around the fence of the Dunaway switchyard. ISECW must submit photographic documentation of the installed NFPA 704 placards and high voltage signage to ESRB for review.	The NFPA provides online guidance for NFPA 704. Jonathan Hart, NFPA Technical Lead, provided clear guidance regarding the location of placement of NFPA Hazard Diamonds in guidance document "Hazardous Materials Identification" dated 05-NOV-2021: "The placement and quantity (of placards) should be decided using the facility's best judgement coupled with advice from your AHJ. At a minimum the placard should be posted on two exterior walls of a facility or building, each access to a room or area, or each principal means of access to an exterior storage area." ISEC West has existing NFPA 704 placards placed on two exterior walls of the buildings/structures in which relatively small quantities of hazardous materials are stored as observed by CPUC auditors at the time of the audit. It is the best judgement of ISEC West that this placard placement is more effective for first responders rather than locating placards at the front entrance of an 1,100-acre solar electric generation site. ISEC West consulted and confirmed with Deputy Fire Chief, Andrew Loper Imperial County Fire Department (ICFD, i.e., the AHJ) that this was the most appropriate means of providing first responders sufficient information for emergency response. --- ISEC West placed high voltage warning signs on all fence lines of the Dunaway Switchyard.	Complete	4/15/2025	Not Applicable	• Hazardous Materials Identification, NFPA, 05-NOV-2021 • Email ISEC West Plant Manager, Samuel Arevalo with Deputy Fire Chief, Andrew Loper, ICFD, dated 4/15/2025. --- • Photos: High Voltage Warning Signs-Dunaway Switchyard

Finding 1 Documents

BHS Battery Handling Equipment

Safety Alarms & Response

Warehouse safety equipment protects employees by preventing the accumulation of hazardous gasses and alerting personnel when dangerous conditions arise. BHS manufactures its safety equipment with the goals of keeping staff safe and warehouses in compliance with OSHA regulations.

BHS provides custom battery handling equipment to meet any challenge.

Contact the BHS sales team at bhs@bhs1.com to learn more about fully customized solutions for the battery room and beyond.

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Hydrogen Exhaust Fan Kit

OVERVIEW

The BHS Hydrogen Exhaust Fan Kit (HEF-KIT) monitors hydrogen gas levels, activating operating alarms and ventilation fans when necessary to exhaust gases. The HEF-KIT is intended for use in battery charging rooms and areas where hydrogen gas may be present.

The HEF-KIT consists of a dual-relay Hydrogen Gas Detector (HGD-DR) and a Hydrogen Exhaust Fan (HEF-1). The Hydrogen Gas Detector monitors hydrogen gas and provides warning of increasing levels before they become dangerous.

Should the concentration of the hydrogen gas in the air surrounding the sensor reach 1% by volume, the yellow Warning LED will light and the 1% internal relay will close, activating the Hydrogen Exhaust Fan for forced ventilation. Should the concentration reach 2% by volume, the red Danger LED will flash, an 80 decibel alarm will sound, and the 2% internal relay will close. The relays will remain closed, LEDs lit, exhaust fan and alarm activated until the hydrogen concentration drops below the corresponding percentages.

FEATURES & BENEFITS

- Continuous monitoring of hydrogen gas levels
- Reliable, highly sensitive, highly stable solid state sensor
- Forced ventilation
- Louvered dampers on exterior of fan prevent domestic air from escaping the room while fan is not in operation
- Improve battery room air quality by exhausting gases produced during battery charge
- Reduce costs with controlled fan operation and prevent unnecessary escape of climate-controlled air
- A HEF-KIT aids in compliance with the following standards:
  NEC 480.9 Ventilation of Battery Rooms, NEC 501.125. (B), 501.105 (1-3), NFPA 2 Hydrogen Technology Code

MODELS & SPECIFICATIONS

HYDROGEN EXHAUST FAN	
DIMENSIONS	24" L x 24" W x 17" H (610 mm x 610 mm x 432 mm)
WEIGHT	Fan: 51 lb (24 kg), Rain shield and damper: 24 lb (11 kg)
MOUNTING	Requires 24 1/4" x 24 1/4" rough opening. 1 1/2" to 8" wall thickness.
POWER REQUIREMENTS	115 V ac, Grounded
AIRFLOW	(4) fans, each rated at 850 ft^3/min, total 3,400 ft^3/min N+1 (redundancy), (3) fans at 850 ft^3/min, total 2,550 ft^3/min for 2,550 ft^3 (72 m^3) area

Note: For HGD-DR specifications, refer to chart below.

DETERMINE HOW MUCH HYDROGEN TO PLAN FOR

Visit BHS1.com to use the Hydrogen Gas Ventilation Caluculator for Forklift Battery Charging Areas to estimate how much air your battery room should move.

Hydrogen Gas Detector

OVERVIEW

Hydrogen Gas Detectors (HGD) protect battery charging rooms and other locations where motive and stationary batteries are present by continuously monitoring hydrogen gas levels. The HGD is equipped with LED lights and an 80 dB alarm. AC- or DC-Powered models are available with dual relay.

MODELS & SPECIFICATIONS

	RELAY	RELAY RATING	POWER REQUIREMENTS	DIMENSIONS	MOUNTING	OPERATING TEMPERATURE
HGD-DR-AC	Dual, Dry Contact Relay	10 A	85 V ac to 265 V ac 50/60 Hz	2 ½" x 4 ¾" x 7" (63.5 mm x 120.7 mm x 178 mm)	(4) 3/16" (4.8 mm) screws	14°F to 104°F (-10°C to 40°C)
HGD-DR-DC			17 V dc to 60 V dc			

Carbon Monoxide & Smoke Detector

OVERVIEW

The Carbon Monoxide & Smoke Detector (CO-S-D) combines two important safety devices in one unit. The CO-S-D features a voice warning system that announces the detected hazard to eliminate confusion. This battery-operated unit will continue monitoring even during a power outage, when many fire and carbon monoxide incidents may occur.

FEATURES & BENEFITS

- When smoke or fire hazard is detected, red LED will flash and three long alarm beeps will sound followed by a verbal warning, “FIRE!” (pattern repeats until smoke is eliminated)
- When a Carbon Monoxide (CO) hazard is detected, four short alarm beeps will sound followed by a verbal warning, “WARNING! CARBON MONOXIDE!” (pattern repeats until the unit is reset or the CO is eliminated)
- Battery-powered to provide protection even during power outages
- Unit warns of low battery power by announcing “LOW BATTERY”, initiating an alarm chirp, and activating a flashing red LED
- Battery door will not close unless the batteries are properly installed
- Test/reset button tests alarm circuitry and triggers the voice announcement
- Nuisance alarms can be temporarily silenced

MODELS & SPECIFICATIONS

	CO-S-D
DIMENSIONS	5.6” x 1.8” (142 mm x 46 mm)
POWER SOURCE	2 AA Batteries
SMOKE SENSOR	Ionization
CO SENSOR	Electrochemical
AUDIO ALARM	85 dB at 10’ (3.05 m)
TEMPERATURE RANGE	40˚F to 100˚F (4.4˚C to 37.8˚C)
HUMIDITY RANGE	10% to 95% Relative Humidity, Non-condensing
WEIGHT	13 oz (369 g)
INTERCONNECTS	No

Fire Extinguisher & Cabinet

OVERVIEW

The Fire Extinguisher & Cabinet (FE-20) includes a 20 lb (9 kg) capacity, Type ABC fire extinguisher and a front-loading cabinet. This multipurpose fire extinguisher is designed for use in combating nearly any fire risk from Class A (trash, wood, and paper), Class B (liquids and gases), and Class C (electrical fires). The cabinet is for indoor or outdoor use and protects the extinguisher from dirt, debris, water, and chemicals.

FEATURES & BENEFITS

- 20 lb (9 kg) Type ABC fire extinguisher comes fully charged and tagged and is rechargeable
- Fire extinguisher range and discharge time: 15’ to 21’ (4.6 m to 6.4 m), 26 seconds
- Fire extinguisher approvals: UL Listed, Meets U.S.D.O.T. Requirements, USCG Approval
- High-density, injection-molded plastic cabinet: 28” H x 11” W x 9” D (711 mm x 279 mm x 229 mm)
- Grid-scored, UV-resistant break panel improves emergency access and does not require shattering glass
- Indoor/outdoor cabinet features natural ventilation, pitched drainage, and rounded corners
- Includes red hammer assembly, cylinder lock with key, and UV-resistant labels

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Hydrogen Gas Detector
Danger
Warning
120 V.
EYE
WASH


Hydrogen Gas
Detector
Danger
Warning
On
1%
2%

MP.812510.6 –Vented Lead Acid Battery System Maintenance (Enersys) Rev. 1.0

Purpose

This procedure provides instruction to inspect, maintain, and conduct periodic maintenance on the EnerSys battery system.

Scope

This procedure describes the steps necessary to inspect and maintain the battery system. As part of the Site Maintenance Plan, or when maintenance is required, maintenance activities are performed according to this procedure.

Responsibility & Authority

Maintenance

- Request NSCR Operator to provide remote functions where possible.
- Isolation, LOTO, and grounding are practiced where applicable.
- Minimum Approach Distances (MAD) are established and maintained.

Safety Instructions

- Create and/or confirm *LOTO permit* per one-lines referenced in this procedure.
- Create a *Job Hazard Analysis* (JHA) to account for all Hazards, Control Measures, and Risk Assessment for performing this procedure and the scope of work being performed.
- Perform Pre-Job Brief (PJB) and discuss the JHA.
- Observe Minimum Approach Distance (MAD) per *NSPS Electrical Safety Program: Attachment A – Electrical Shock Protection Boundaries* during switching and while in proximity of any equipment not covered by a complete LOTO isolation.
- Observe all safety precautions in the NSPS Electrical Safety Program and Safety Manual Procedures.

Reference Documents

- NSPS Safety Manual Procedures
- NSPS Electrical Safety Program
- NSPS Lock Out/Tag Out Procedure
- Job Hazard Analysis and Pre Job Brief
- OEM Manual

Equipment

- Standard technician tool kit
- Personnel must be in proper PPE as identified on posted arc flash label or as required by procedure.
- Calibrated digital multi-meter rated accordingly for scope voltages
- Calibrated clamp on Amp meter
- Torque wrench
- Megger Bite3

- Hydrometer

Materials

- Distilled Water
- Lint-free cloths
- General purpose cleaner for use on industrial equipment

Initial Conditions

- A battery string must be disconnected from the charging bus prior to working on individual cells/batteries within multi-cell batteries.
- Tools are insulated when maintaining batteries.
- Battery inspections must be made while the battery is in normal float conditions.

Definitions

Acronyms / Symbols	Definition / Description
CMMS	Computerized maintenance management system
EHS	Environmental, Health and Safety
OEM	Original Equipment Manufacturer
FSE	Field Service Engineer (O&M Technician)
LOTO	Lock Out / Tag Out
PPE	Personal Protective Equipment
JHA	Job Hazard Analysis
PJB	Pre-Job Brief
MAD	Minimum Approach Distance
⚠ DANGER	DANGER indicates a hazardous situation which, if not avoided, will result in death or serious injury.
⚠ WARNING	WARNING indicates a hazardous situation which, if not avoided, could result in death or serious injury.
⚠ CAUTION	CAUTION indicates a hazardous situation which, if not avoided, could result in minor or moderate injury.
NOTICE	NOTICE is used to address practices not related to personal injury.
	Warning regarding dangerous voltage There are different voltages associated within the electrical equipment. All work on the equipment shall be performed as described in the documentation for the equipment and by a qualified technician.
	Warning regarding dangerous mechanical energy There is mechanical energy and or moving parts associated within the solar array equipment. All work on the equipment shall be performed as described in the documentation for the equipment and by a qualified technician.

Procedure

Task 1 – Monthly Battery Inspection

- ☐ 1.1 RECORD the battery terminal voltage and compare to the float charge settings. Record on data record table 1.
- ☐ 1.2 CHECK Cleanliness and General appearance of batteries, battery rack, and area.
  - ☐ a. If the battery shows signs of spilled electrolyte, wipe with a cloth dampened with 1.0lb/1.0 gal (0.5 kg/5.0 liter) mixture of sodium bicarbonate and cold water. Follow by wiping with a cloth dampened with clean water.
- ☐ 1.3 VISUAL CHECK electrolyte levels. Record on data record table 1.
- ☐ 1.4 VISUAL CHECK for cracks in cell containers or leakage of electrolyte.
- ☐ 1.5 VISUAL CHECK for any evidence of corrosion at cell terminals, connectors, or rack.
- ☐ 1.6 DO NOT clean or place upside down the Leak-resistant plugs that contain frit or contain flame arrestor plugs with ceramic funnel
  - ☐ a. IF frit needs to be moistened with electrolyte, the plug must be replaced.
  - ☐ b. Plugs WITHOUT FRIT can be cleaned with purified water if necessary, ensure they are dry before reinstalling to battery
- ☐ 1.7 RECORD room ambient temperature. Record on data record table 1
- ☐ 1.8 CHECK condition of ventilation equipment. Inspect and TEST GAS Detectors.
- ☐ 1.9 RECORD pilot cell voltage. Record on data record table 1.
  - ☐ a. IF pilot cell voltage does not agree RECORD specific gravity of the cell.
- ☐ 1.10 ENSURE the battery charging station is free of any ground fault alarms that indicate an unintentional battery ground. Record on data record table 1.
- ☐ 1.11 PHOTOGRAPH the battery bank with all battery cells visible. ENSURE the GPS location is enabled in the photograph properties of the device.
- ☐ 1.12 ATTACH photograph to the Work Order.

Task 2 – Quarterly Inspection

- ☐ 2.1 Perform monthly inspection, plus.
- ☐ 2.2 RECORD the voltage of all cells with a voltage test device. RECORD to a minimum of 3 decimal places.
- ☐ 2.3 IF cell voltage differs from battery charge setting divided by the number of cell in your battery by more than 0.05v measure specific gravity and correct to 77°F verify 1.215 ±0.010.
- ☐ 2.4 RECORD and record specific gravity of the pilot cell
- ☐ 2.5 RECORD electrolyte temperature of 10% or more of the battery cells.
- ☐ 2.6 RECORD specific gravity of 10% of the cells in the battery. The 10% measured must be cells other than what have been tested with in the last year and include any cells that exceed the acceptable individual cell float voltage range.

Task 3 – Annual Inspection

- ☐ 3.1 RECORD specific gravity and temperature of each cell.
- ☐ 3.2 PERFORM detailed visual inspection of the battery jar and terminals.
- ☐ 3.3 INSPECT Battery rack/cabinet and anchors for rusting, corrosion and other deterioration that could affect the battery rack structural or seismic integrity and strength.
- ☐ 3.4 INSPECT approx. 10% of the battery rack fasteners for tightness.
- ☐ 3.5 PERFORM the following steps where applicable for seismic installations.
  - ☐ a. INSPECT the battery to ensure an intercell spacer is present between each battery jar.
  - ☐ b. INSPECT the intercell spacers in place for deterioration (broken, warped, etc.)
  - ☐ c. VERIFY that the space between each of the end rails and the end battery jars is less than or equal to 3/16”.
- ☐ 3.6 VERIFY that the rail insulators are in place and in good condition.
- ☐ 3.7 VERIFY that the electrolyte level of each cell is between the high and low level marks imprinted on the cell case. Use distilled or de-ionized water for adjusting electrolyte levels.
- ☐ 3.8 IF electrolyte exceeded the high level mark perform the following:
  - ☐ a. ENSURE flame arrestors are not clogged.
  - ☐ b. RINSE the flame arrestor in distilled water and allow time to dry.
  - ☐ c. VERIFY all white deposits on flame arrestor are gone. If there are still white deposits, re-perform cleaning.
- ☐ 3.9 INSPECT each battery cell jar, cell jar cover, and seals (jar to cover seal, post to cover seal) for deterioration (acid leakage, cracking crazing-spider web effect, distortion, etc.)
- ☐ 3.10 EXAMINE the plates in each cell for Sulfation.
- ☐ 3.11 ENSURE battery is on float charge or open circuit before beginning the impedance readings.
- ☐ 3.12 RECORD cell internal impedance in accordance with MEGGER Bite instrument on all cells.
- ☐ 3.13 IF cell impedance differs by more than 25% between the other cells investigate the cause of the difference.
- ☐ 3.14 RECORD resistance between the negative connector on one battery and the positive connector of the next battery in the series circuit with Megger BITE3 or BITE5 Advance.
- ☐ 3.15 PERFORM measurements on all remaining battery connections.
  - ☐ a. All resistances must be within 20% of the average of all connections.
- ☐ 3.16 IF any resistances exceed the spec in the previous step:
  - ☐ a. DISCONNECT the charger and loads from the battery.
  - ☐ b. CLEAN problem connections.
  - ☐ c. CHECK torque in accordance with battery owner’s manual table 3.

☐ d. APPLY no-ox grease.

☐ e. PERFORM resistance measures on connections that were checked.

☐ 3.17 VERIFY Continuity by checking that there are no open circuit ohmic measurements for terminal connections, unit to unit connections, and batteries.

☐ 3.18 DETERMINE the pilot cell for the next year by choosing the cell with the lowest voltage.

Task 4 – 5 Year Maintenance

☐ 4.1 VERIFY the station battery can perform as manufactured by CONDUCTING a performance or a modified performance capacity test of the entire battery bank (per IEEE 450).

Monthly Readings – Table 1	
Site Code:	Date:
Name:	
Battery Location:	
Number of Cells Per Bank:	Pilot Cell (PC) Number:
Battery Charger Manufacturer:	
Model:	

Cell Voltage Limits

All readings are to be taken with the battery stabilized on float.

Bank	Date	Charging		Electrolyte	Pilot Cell Readings		
		Terminal Volts	Float Charge Setting	Between High and Low Marks	Volts	Specific Gravity	Ambient Air Temp
		Pass/Fail Criteria:		H - L	2.15V-2.18V @ 77 °F	1.215 ± 0.010 @ 77°F	≤ 120 °F
1.							
2.							

*Float Charge Setting (____) = 2.23V * Number of Cells*

Monthly Visual Inspection

Provide comments for any item that you indicated No.	Yes	No
Free from unintentional ground fault alarms.		
Positive plates and internal hardware are free from flaking.		
Positive plates are free of discoloration and sulfur crystals (use a light to view).		
Terminal post seals are in good visible condition.		
Vents, flame arresters, and dust caps are in good visible condition.		
Connections are free from corrosion.		
Cell jars are in good condition.		
Rack is in good condition and free from corrosion.		
Ventilation fans and vents are working.		
Goggles, face shield, gloves, and an apron is available and in good condition.		
Eyewash is clean and ready to use.		

Class C fire extinguisher is available and has been inspected.				
Test Equipment				
Make/Model:		Calibration Date:		
Make/Model:		Calibration Date:		
Comments			Work Order Number	
Technician Signature:		Date:		

Quarterly Readings – Table 2							
Site Code:							
Battery Bank:							
Cell	Voltage	Cell	Voltage	Cell	Voltage	Cell	Voltage
1.		16.		31.		46.	
2.		17.		32.		47.	
3.		18.		33.		48.	
4.		19.		34.		49.	
5.		20.		35.		50.	
6.		21.		36.		51.	
7.		22.		37.		52.	
8.		23.		38.		53.	
9.		24.		39.		54.	
10.		25.		40.		55.	
11.		26.		41.		56.	
12.		27.		42.		57.	
13.		28.		43.		58.	
14.		29.		44.		59.	
15.		30.		45.		60.	

Pass/Fail Criteria: 2.12V-2.29V					
Cell	Specific Gravity (1.215 ± 0.010 @ 77°F)	Temperature (°F) ≤ 120 °F	Cell	Specific Gravity (1.215 ± 0.010 @ 77°F)	Temperature (°F) ≤ 120 °F

Comments	Work Order Number

Technician Signature:		Date:	

Annual Readings – Table 3					
Site Code:					
Battery Bank:					
Internal Resistance Baseline (if applicable):					
Cell	Voltage (2.15V – 2.18V)	Cell Impedance	Connector Resistance	Specific Gravity (1.215 ± 0.010 @ 77°F)	Temperature ≤ 120 °F
1.					
2.					
3.					
4.					
5.					
6.					
7.					
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57.					
58.					
59.					
60.					

	Is continuity present? (Yes/No)	Pilot Cell for Next Year
Bank 1:		
Bank 2:		

Comments	Work Order Number

Technician Signature:		Date:	

Prepared By	
Name	**Date**
Approved By	
Name	**Date**

Version	Date	Brief Description
1.0	MM/DD/YYYY	First Edition

Finding 2 Documents

JHA-0434313

NOVASOURCE™ POWER SERVICES

Service Territory: East San Diego (El Centro), CA Area

Generated by: samuel arevalo

Account Type: Utility Power Plant

Work Type: UPP - PM - Rounds

Account Name:

Issue Description: IVW1 - 5/30 - Weekly Rounds

Region: SoCal

Priority: 6 - Safety/Environmental/Contractual

Territory: West

RISK ANALYSIS	LIKELIHOOD			
CONSEQUENCES	VERY LIKELY (VL): Could Happen Anytime	LIKELY (L): Could Happen Sometime	UNLIKELY (U): Could Happen, But Isn't Likely	VERY UNLIKELY (VU): Could Happen, But Probably Won't
CRITICAL (C): Fatal or Permanent Disability	HIGH	HIGH	HIGH	MEDIUM
MAJOR (MJ): Long Term Illness or Serious Injury	HIGH	HIGH	MEDIUM	MEDIUM
MODERATE (MO): Medical Attention and Several Days Off	HIGH	MEDIUM	MEDIUM	LOW
MINOR (MI): First Aid Needed	MEDIUM	MEDIUM	LOW	LOW

Step	Risk	Risk Rating	Control Measure	Controlled Risk Rating
Drive to work locations.	Vehicle Hazards	Consequence: Minor Likelihood: Very Unlikely Rating: Low	Always use seat belt Never use cell phone while driving Observe all speed limits and adjust for weather conditions Be aware of all personnel working and driving in the field When possible, always exit an area by driving forward If backing up is required, use a spotter when possible When parking in a lot, always back into	Consequence: Minor Likelihood: Very Unlikely Rating: Low

			parking spot upon arrival	
Perform visual checks and record data for technician rounds.	Possible exposure to arc flash	Consequence: Moderate Likelihood: Very Unlikely Rating: Low	No exposed metal on person (remove rings and jewlery) Use insulated tools Wear proper electrical safety PPE and Arc rated clothing at all times Maintain arcflash boundaries during evoltions that could cause an arcflash. Second person must be present & standing outside of the arc flash boundary with a shepherd's hook or other safe means of release Safety second must be wearing identical PPE as the tech performing the scan If in a shelter, 2 means of egress with doors in the open position If in a shelter, egress pathways must be clear of obstacles Follow instructions listed on the arc flash label	Consequence: Minor Likelihood: Very Unlikely Rating: Low
			Be aware of where you are stepping before you step Watch out for	

	Erosion - Uneven surfaces	Consequence: Minor Likelihood: Very Unlikely Rating: Low	erosion while driving vehicles. When in doubt, walk it out Use a spotter when backing up or navigating erosion when nessessary Never enter erosion without first assessing and reporting your location Be on the look out for any exposed underground cabling Avoid erosion when possible Avoid driving through mud when possible	Consequence: Minor Likelihood: Very Unlikely Rating: Low
Met station inspection, tipping rain bucket, cleaning pyranometers.	Erosion - Uneven surfaces	Consequence: Moderate Likelihood: Likely Rating: Medium	Be aware of where you are stepping before you step Watch out for erosion while driving vehicles. When in doubt, walk it out Use a spotter when backing up or navigating erosion when nessessary Never enter erosion without first assessing and reporting your location Be on the look out for any exposed underground cabling Avoid erosion when possible Avoid	Consequence: Minor Likelihood: Unlikely Rating: Low

			driving through mud when possible	
	Fall Hazard - Ladder Use	Consequence: Moderate Likelihood: Likely Rating: Medium	Evaluate ground to ensure good footing to support ladder stability Do not shift center of gravity beyond ladder boundary (belt buckle rule) Use proper body mechanics Maintain 3-point contact while climbing or descending the ladder Use only Type 1A or 1AA step ladders Ladder must be fiberglass Do not use a defective ladder Stand no higher than the second rung from the top of the step ladder	Consequence: Moderate Likelihood: Very Unlikely Rating: Low
			Personnel must be in proper PPE as identified on arc flash label or as required by procedure Maintain arc flash and shock protection boundaries Use Insulated tools Ensure you are trained and qualified to work on the system Utilize electrical insulating gloves	

Substation Inspection	Shock Hazard	Consequence: Moderate Likelihood: Unlikely Rating: Medium	with leather protectors, EH rated boots LIVE - DEAD - LIVE checks inside ALL cabinets to worked in Never work on live electrical equipment. De-energize, LOTO and apply grounds as necessary to render the area an equal-potential zone. Second person must be present & standing outside of the arc flash boundary with a shepherd's hook or other safe means of release	Consequence: Minor Likelihood: Very Unlikely Rating: Low

JHA-0434313

Signer	Company	Email	Phone	Date

NOVASOURCE™
POWER SERVICES

Project Name: ISEC-West

Training Locations: TEAMS meeting

Date 6/12/2025

Time: 0800

Topics Overview REFRESHER TRAINING.

1. **Work Order Details: Understanding all parts of a work order, including scope, instructions, and adding proper troubleshooting or completed work details.**
2. **Work Order Completion: Procedures for properly completing and closing work orders.**
3. **JHA (Job Hazard Analysis): Identifying hazards, risk assessments, and mitigation plans before work starts. Adding JHA to work order.**
4. **Pre-Job Briefing: Communicating job scope, hazards, safety measures, and roles before beginning work.**
5. **Keeping Records: Proper documentation and record-keeping of all work activities, training, and inspections.**

Participants Sign in sheet

Name	Position
Jose Lopez	Field Tech II
Ivan Ibarra	Field Tech II
Jesus Roth	Field Tech III
Manuel Antunez	Field Tech I
Jose Garcia	Field Tech III
Luis Ceceno	Field Tech II

Finding 3 Documents

CSOLAR IV WEST, LLC

Emergency Drill Documentation

Site: **ISEC West**
3020 County Road 16
Seeley, California

Drill Date: 6-11-25

Drill Type:

- ☐ Severe Weather – Type:
  - ☐ Lightning Storm
  - ☐ Tornado
  - ☐ Earthquake
  - ☐ Windstorm
  - ☐ Dust Storm
  - ☐ Heavy Rain/Flash Flood
- ☐ Wildfire
- ☒ Electrical or Building Fire
- ☐ Criminal Activity
- ☐ Sabotage
- ☐ Cyber Security

Time Drill Initiated: 1315 Time Drill Completed: 1405

Scenario details (***BE SPECIFIC***, e.g., transformer fire in substation):

Work order - 00697476

Participants:

Name	Position	Signature
Jose R. Lopez	Tech 2	
Ivan Ibarra	Tech 2	
Manuel Antunez	Tech 1	
Luis Cerano	Tech 2	
Jesus Roth	Tech 3	
Samuel Arevalo	Area Manager	

Response Details (e.g., what protocols/procedures were followed? Who did what? What equipment was used?):

Electrical Fire Drill – Inverter 1.5, Block 1

A simulated electrical fire occurred at Inverter 1.5 located in Block 1.

Personnel Involved:

- **Luis Ceceno** and **Ivan Ibarra** (Site Technicians): Reported the incident and location to the Operations Control Center.
- **Jose Lopez**, **Jesus Roth**, and **Manuel Antunez** were notified by Operations of the incident.
- **Samuel Arevalo- Operations and Emergency response team.**

Response Actions:

- **Luis Ceceno** and **Ivan Ibarra** reported the incident and location to the Operations Control Center and performed Inverter isolation procedure

Notes Site team provided location (coordinates) of incident, damaged equipment, and steps of their isolation actions.

— improvements — Request Operation Center to shutdown feeders.

- **Jose Lopez-** was routed to Interstate 8th and Dunaway to guide the fire emergency response team to the site location of incident.

Notes Responded, and reported to block 1 entrance. Awaited arrival of fire dept. coordinates were provided. Reported arrival of fire dept. and escorted them to location of inverter 1.5.

Improvements — Street names near by block 1.

- **Jesus Roth** and **Manuel Antunez** were routed directly to the incident area to monitor for any safety issues and to ensure the wellbeing of on-site personnel.

Notes Responded and reported to area Block 1 inverter 1.5. Conducted site perimeter with being check and reported info to operation Center.

- **Samuel Arevalo** Coordinated emergency response efforts by receiving incident reports from site teams and managing all related communications with operations and emergency personnel.

Notes Recieved call From the Site team. checked relayed info by site team was correct.

- Were emergency response agencies invited to participate? ☐ Yes ☒ No

  If yes, which agencies: N/A

  Did the agency participate? ☐ Yes ☒ No

- Were there any unforeseen challenges? ☐ Yes ☒ No

  If yes, please describe: NA

- Were deficiencies or potential improvements to emergency procedures identified? ☒ Yes ☐ No

  If yes, please describe: See improvements under name/job/teams notes.

- Were revisions/updates to emergency procedures made? ☐ Yes ☒ No

  If yes, please describe: NA

Additional Comments/Information:

Completed drill, notes and improvements have been noted. work order 00697476

Finding 4 Documents


SEVILLE
LIFELINE
AED
SHOCK


ZOLL
AED PLUS

Finding 5 Documents

Attachment D

Confined Space Inventory

Confined Space Number	Area / Label Description	Confined Space Labeled? (Yes or No)		Comments
96	Inverter Skid	Yes		Total of 96 Inverter Skids in the PV field
5	PVCS Skid	Yes		1 PVCS Skids for each block. 5 PV field blocks
1	Water tank (fire department)	Yes		water tank outside O&M building
1	Water tank (O&M building water treatment system)	Yes		water tank by water treatment system facility near O&M building
4	Sewer Vaults	Yes		Near O&M building

(Duplicate this page as needed)

Finding 6 Documents

2025

STI SP001 Annual Inspection Checklist

General Inspection Information:

Inspection Date:	2-26-25	Retain Until Date:	2-26-28 (36 months from inspection date)
Prior Inspection Date:	New	Inspector Name:	Jose Garcia JDE
Tank Inspected: Emergency Generator – Sub-base tank			

Inspection Guidance:

- For equipment not included in this Standard, follow the manufacturer recommended inspection/testing schedules and procedures.
- The periodic AST Inspection is intended for monitoring the external AST condition and its containment structure. This visual inspection does not require a Certified Inspector. It shall be performed by an owner's inspector who is familiar with the site and can identify changes and developing problems.
- Remove promptly upon discovery standing water or liquid in the primary tank, secondary containment area, interstice, or spill container. Before discharge to the environment, inspect the liquid for regulated products or other contaminants and dispose of it properly.
- In order to comply with EPA SPCC (Spill Prevention, Control and Countermeasure) rules, a facility must regularly test liquid level sensing devices to ensure proper operation (40 CFR 112.8(c)(8)(v)).
- (*) designates an item in a non-conformance status. This indicates that action is required to address a problem.
- Non-conforming items important to tank or containment integrity require evaluation by an engineer experienced in AST design, a Certified Inspector, or a tank manufacturer who will determine the corrective action. Note the non-conformance and corresponding corrective action in the comment section.
- Retain the completed checklists for 36 months.
- Complete this checklist on an annual basis supplemental to the owner monthly-performed inspection checklists.
- **Note: If a change has occurred to the tank system or containment that may affect the SPCC plan, the condition should be evaluated against the current plan requirement by a Professional Engineer knowledgeable in SPCC development and implementation.**

Item	Task	Status	Comments
1.0 Tank Containment – Double-Walled Tank			
1.1 Secondary Tank – Visible Portions	Check for: • Holes or cracks in walls, welds, ports? • Evidence of corrosion? • Evidence of leakage? • Paint failure	☐ Yes* ☒ No ☐ N/A	No issues
2.0 Tank Foundation and Supports			
2.1 Foundation	Settlement or foundation washout?	☐ Yes* ☒ No	
2.2 Concrete pad	Cracking or spalling?	☒ Yes* ☐ No	light cracking – No issue
2.3 Supports	Check for corrosion, paint failure, etc.	N/A	
2.4 Water drainage	Water drains away from tank?	☒ Yes ☐ No*	
2.5 Tank grounding	Strap secured and in good condition?	☒ Yes ☐ No*	
3.0 Cathodic Protection			
3.1 Gavlvanic cathodic protection system	Confirm system is functional, includes the wire connections for galvanic systems	N/A	
3.2 Impressed current system	a. Inspect the operational components (power switch, meters, and alarms).	N/A	
	b. Record hour meter, ammeter and voltmeter readings.	N/A	

Item	Task	Status	Comments
4.0 Tank Shell, Heads, Roof			
4.1 Coating	Check for coating failure	☐ Yes* ☒ No	
4.2 Steel condition	Check for: • Dents • Buckling • Bulging • Corrosion • Cracking	☐ Yes* ☒ No	
4.3 Roof slope	Check for low points and standing water	N/A	
5.0 Tank Equipment			
5.1 Vents	Verify that components are moving freely and vent passageways are not obstructed for: • Emergency vent covers	☒ Yes* ☐ No	
5.2 Valves	Check the condition of all valves for leaks, corrosion, and damage.	☐ Yes* ☒ No	
5.2.1 Anti-siphon, check and gate valves	Cycle the valve open and closed and check for proper operation.	☐ Yes ☐ No* ☒ N/A	
5.2.2 Pressure regulator valve	Check for proper operation. (Note that there may be small, 1/4 inch drain plugs in the bottom of the valve that are not visible by looking from above only)	☐ Yes ☐ No* ☒ N/A	
5.2.3 Expansion relief valve	Check that the valve is in the proper orientation. (Note that fuel must be discharged back to the tank via a separate pipe or tubing.)	☐ Yes ☐ No* ☒ N/A	

Item	Task	Status	Comments
5.2.4 Solenoid Valves	Cycle power to valve to check operation. (Electrical solenoids can be verified by listening to the plunger opening and closing.)	N/A	
5.2.5 Fire and Shear Valves	Working correctly; Not wired in open position; Fusible element in place; test ports sealed?	N/A	
5.3 Interstitial leak detection equipment	Check condition of equipment, including: • The wire connections of electronic gauges for tightness and corrosion • Activate the test button, if applicable. Note: If the leak detection equipment is not functional, remove the basin drain plug to determine if the primary tank is leaking. Replace basin drain plug and document.	☐ Yes ☐ No* ☒ N/A	
5.4 Spill containment boxes on fill pipe	a. Has corrosion, damage, or wear has compromised the ability of the unit to perform spill containment functions?	☐ Yes* ☒ No ☐ N/A	
	b. Inspect the connections to the AST for tightness, as well as the bolts, nuts, washers for condition and replace if necessary.	N/A	
	c. Drain valves must be operable and closed	N/A	

Item	Task	Status	Comments
5.5 Strainer	a. Check that the strainer is clean and in good condition.	☒ Yes ☐ No* ☐ N/A	
	b. Access strainer basket and check cap and gasket seal as well as bolts.	☒ Yes* ☐ No* ☐ N/A	
5.6 Filter	a. Check that the filter is in good condition and is within the manufacturer's expected service life. Replace, if necessary.	☒ Yes ☐ No*	
	b. Check for leaks and decreased fuel flow	☒ Yes ☐ No*	
5.7 Flame arrestors	Follow manufacturer's instructions. Check for corrosion and blockage of air passages.	N/A	
5.8 Leak detector for submersible pump systems	Test according to manufacturer's instructions and authority having jurisdiction. Verify leak detectors are suited and properly installed for aboveground use.	N/A	
5.9 Liquid level equipment	a. Has equipment been tested to ensure proper operation?	☒ Yes ☐ No*	
	b. Does equipment operate as required?	☒ Yes ☐ No*	
	c. Follow manufacturer's instructions	☒ Yes ☐ No*	

Item	Task	Status	Comments
5.10 Overfill equipment	a. Follow manufacturer's instructions and regulatory requirements for inspection and functionality verification.	☐ Yes ☐ No* N/A	Procedures used during filling
	b. Confirm device is suited for above ground use by the manufacturer	☐ Yes ☐ No*	
6.0 Insulated Tanks			
6.1 Insulation	Check condition of insulation for: • Missing sections • Areas of moisture • Mold • Damage	N/A	
6.2 Insulation cover or jacket	Check for damage that will allow water intrusion	N/A	
7.0 Miscellaneous			
7.1 Electrical wiring and boxes	Are they in good condition?	☐ Yes* ☐ No* ☐ N/A	
7.2 Labels and tags	Ensure that all labels and tags are intact and readable.	☐ Yes* ☐ No* ☐ N/A	

Additional Comments:

Finding 7 Documents

NOVASOURCE®
POWER SERVICES

HSE SECTION 4.0

EMERGENCY ACTION PLAN (EAP)

Document Control / History Information

Department(s):	**HSE**
Document Number:	HSE-SOP-004
Subject:	**Emergency Action Plan (EAP)**
Initial Release Date:	04/01/2020
Latest Release Date:	06/03/2025

Prepared By:

Name	Dept.	Signature
Preston Wetzel	EHS -UPP	Preston Wetzel

Reviewed By:

Name	Dept.	Signature
Katie Catapano	EHS - Corporate	Katie Catapano

Document Revision History

Rev #	Revision/Review Date	Revision/Review Made By	Description of Changes / Comments
00	04/01/2020	Regine Wendt	Initial Release
01	05/10/21	Preston Wetzel	Re-write to incorporate FS energy services.
02	02/09/22	Preston Wetzel	Minor edits throughout. Changed program title to Emergency Action Plan.
03	06/03/2025	Megan Winchell	Clarified Roles and Responsibilities, removed redundancies, added Appendix C – After Action Review

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1.0 PURPOSE, SCOPE, & DEFINITIONS

1.1 Purpose

1.1.1 This Emergency Action Plan (EAP) has been prepared for all NovaSource Power Services (NSPS) facilities and sites.

1.1.2 This plan outlines the course of action to be taken in the event of emergencies.

1.2 Scope

1.2.1 This procedure is applicable to all NovaSource Power Services (NSPS) sites and facilities.

1.2.2 If an owner/customer has additional requirements for a site that are not already covered in this document, then a site specific version may be created.

1.3 Acronyms & Definitions

Acronyms & Definitions	
Designee	NSPS Employee who is appointed by the Area Manager/Supervisor to be the primary decision maker for a task or a given emergency response scenario.
EAP	Emergency Action Plan
Hurricane	A tropical cyclone in which the maximum sustained surface wind (using the U.S. 1-minute average) is 64 knots (74 mph or 119 km/hr) or more. The term hurricane is used for Northern Hemisphere tropical cyclones east of the International Dateline to the Greenwich Meridian.
Hurricane Watch	An announcement that sustained winds of 64 knots (74 mph) or higher are possible within, the specified area in association with a tropical, subtropical, or post-tropical cyclone. Because hurricane preparedness activities become difficult once winds reach tropical storm force, the hurricane watch is issued 48 hours in advance of the anticipated onset of tropical storm force winds.
Hurricane Warning	An announcement that sustained winds of 64 knots (74 mph) or higher are expected somewhere within the specified area in association with a tropical, subtropical, or post-tropical cyclone. Because hurricane preparedness activities become difficult once winds reach tropical storm force, the warning is issued 36 hours in advance of the anticipated onset of tropical-storm-force winds. The warning can remain in effect when dangerously high water or a combination of dangerously high water and waves continue, even though winds may be less than hurricane force.
Incipient Fire	A fire which is in the initial or beginning stage and which can be controlled or extinguished by portable fire extinguishers, class II standpipe or small hose systems without the need for protective clothing or breathing apparatus. Typically, this is a fire which is no larger than the size of a small trash container
Muster Point	A designated area where all employees will assemble during a site emergency.
NSPS	NovaSource Power Services
Area Manager (AM)	The primary Manager or Supervisor that has responsibility for a NSPS facility or Site
Tornado Watch	Tornadoes are possible in and near the watch area. Review and discuss your emergency

	plans and check supplies and your safe room. Be ready to act quickly if a warning is issued or you suspect a tornado is approaching. Acting early helps to save lives! Watches are issued by the Storm Prediction Center for counties where tornadoes may occur. The watch area is typically large, covering numerous counties or even states.
Tornado Warning	A tornado has been sighted or indicated by weather radar. There is imminent danger to life and property. Move to an interior room on the lowest floor of a sturdy building. Avoid windows. If in a mobile home, a vehicle, or outdoors, move to the closest substantial shelter and protect yourself from flying debris. Warnings are issued by your local forecast office. Warnings typically encompass a much smaller area (around the size of a city or small county) that may be impacted by a tornado identified by a forecaster on radar or by a trained spotter/law enforcement who is watching the storm.
Business Unit (BU) Work Group	A BU Work group is defined as a team of technicians/Employees that directly report to one Area Manager/Lead.

2.0 ROLES & RESPONSIBILITIES

2.1 Area Manager (AM) / Regional Director

2.1.1 Acting as the sole liaison to senior emergency services personnel.
2.1.2 Ensure that site Employees have been trained in and comply with this plan.
2.1.3 Verifying that emergency evacuation routes and emergency assembly areas are accessible.
2.1.4 In the event of an emergency evacuation, the Area Manager (or Designee) is also responsible for directing Employees, as follows:
2.1.5 Relaying the final accountability results to senior Emergency Services staff.
2.1.6 Having sole responsibility to allow workers to return to the Site or to dismiss them from the Site.
2.1.7 Organizing a meeting of all key Employees after each evacuation to investigate, discuss, and review the occurrence.
2.1.8 Assessing Site conditions and directing emergency response activities in accordance with the Emergency Action Plan (EAP).
2.1.9 Making sure that information regarding Site evacuations, emergency assembly areas, communication, and other emergency procedures are accurate and up to date.
2.1.10 Conducting routine EAP drills and an evaluating compliance with the EAP.
2.1.11 Ensuring site contact information and Site maps are accurate and up to date.
2.1.12 Preparing detailed written reports of each incident, which include recommendations for preventing future incidents and suggestions for improved handling of similar emergencies.

2.2 Health, Safety and Environmental Department

2.2.1 Review and update this plan periodically.
2.2.2 Assist with monitoring training on this plan.

2.2.3 Provide assistance to the field for serious accident response and incident investigations as necessary.

2.2.4 Provide feedback and recommended corrective actions to Sites after drills or emergency events take place.

2.3 Site Team Members

2.3.1 Be familiar with and follow this plan.

2.3.2 Assist in updating site specific Appendices (attachments) to this plan.

2.3.3 Managing emergency equipment or supplies, including first aid kits, fire-fighting equipment, and PPE.

2.3.4 Monitor work areas for potential fire risks and obstructed fire exits, alarm stations, fire extinguishers.

2.3.5 Immediately report any emergencies to the Area Manager or Designee.

3.0 SITE SPECIFIC REQUIREMENTS

3.1 Site Access for Emergency Personnel

3.1.1 Site/substation access for emergency services shall be made readily available in the event of an emergency

3.1.2 If site access gates are normally kept locked, a Knox Corporation key box or padlock for emergency access (Fire dept. access) shall be managed next to the locked access gate(s).

- The method used to grant emergency access into the site with locked gates should be communicated to the local fire dept.
- Keys to the padlocks, lockbox combinations, etc. shall be shared with the local fire dept.

3.2 Emergency Contact List

3.2.1 Ensure an Emergency Contact List (Attachment A) is created and maintained for each NSPS Site/facility

3.2.2 Ensure current copies of the Emergency Contact List for each Site are:

- Placed in the Office/O&M building (if applicable) and all company service vehicles/technician binders.
- Included as part of the site-specific safety orientation.

3.2.3 In addition to the Emergency Contact List mentioned above, each site (or BU Work Group) should maintain a current list of all Team Members assigned to the site(s) with their contact information; this list should be accessible to all employees in the event of an emergency.

- A template was created on a second tab of the Emergency Contact List (Attachment A) that can be used to maintain a list of all Team Members assigned to the site.

3.3 Site Maps & Drawings

3.3.1 Ensure site map(s) (Attachment B) are created for each NSPS operating site which identifies the layout of the site, site access roads, emergency muster point location(s), & directions to the nearest trauma center (hospital/medical clinic)

3.3.2 Sites that have an office/O&M building should also create a drawing of the building that identifies the following elements as applicable:

- Location of Emergency Response Equipment
- Emergency exits
- Muster points
- Tornado shelters
- Hazardous waste, universal waste, and flammable material storage locations
- Power source location (electrical panel) for the building
- Compass rose, site name, & address
- SDS location

3.3.3 Ensure copies of site maps & drawings are:

- Placed in the O&M building (if applicable) and made readily accessible to all NSPS Employees at the site
- Included as part of the site-specific safety orientation.

3.4 Emergency Response Equipment (ERE)

3.4.1 Emergency Response Equipment includes fire extinguishers, AED's, first aid kits, emergency showers, eyewash stations, spill kits

3.4.2 All emergency response equipment shall be inspected monthly.

- Monthly ERE inspections shall be documented using the monthly tech round checklist and documented in work order system
- Discrepancies identified shall be noted on the form used and corrected as soon as possible.
- Emergency response equipment with identified discrepancies shall not be used and shall be taken out of service until the discrepancies are corrected.

3.4.3 All emergency response equipment should be clearly marked and easily accessible at all times

3.4.4 Inspection and maintenance of emergency response equipment should be done per OEM guidelines

3.5 Emergency Drills

3.5.1 Emergency drills shall be conducted at a minimum annually at each work site

- Some NSPS Sites may have additional Emergency Drill requirements based on location and/or client contract obligations

3.5.2 Prior to conducting any full-scale drills, Team Members should be assigned to observe the drill, take notes and provide feedback at a debrief which will be recorded and evaluated.

3.5.3 After Action Reviews (Appendix C) shall also be conducted with involved personnel following each actual emergency to identify the strengths, deficiencies, and opportunities for improvement.

3.5.4 Lessons learned should be communicated to all stakeholders

3.5.5 Annual emergency drill will be scheduled and documented via work order system

4.0 EMERGENCY ACTION PROCEDURE STEPS

4.1 In the Event of *any emergency*, the following steps shall be taken:

Step	Action
1	Anyone observing an emergency condition should immediately contact the Area Manager (AM) or Designee by any method possible including, in person, by radio, or by phone **NOTE:** *In a lone worker situation, the NSPS REMOTE OPERATIONS CONTROL CENTER may act as the Designee to assist the lone worker with contacting emergency services and/or making appropriate notifications.*
2	The BUL or Designee, will initiate this procedure and notify all on-site personnel via radio, phone, or other means • Announce, “Initiate emergency Action procedure.” AND designate the muster point location
3	Upon initiating the emergency action procedure, personnel shall immediately assemble in the designated muster point location(s)
4	If emergency services are needed, the BUL or Designee, will call 911 to request appropriate emergency services, and provide all pertinent information concerning the emergency including: • Type of emergency • Address and GPS coordinates of worksite • Location of the emergency (e.g. block/equipment, trailer, parking lot, etc.) • Number of affected people

5	When appropriate, the BUL or Designee shall notify the NSPS REMOTE OPERATIONS CONTROL CENTER and request that they continue with other notifications to allow the Area Manager or Designee time to manage the emergency event.
6	The BUL or Designee, shall assign personnel to the following duties: • Send person(s) to meet Emergency Services • Assign Person(s) to account for all personnel at the Site • If required, assign personnel to locate any missing persons • Call in additional Employees, if available and necessary • Assign personnel additional duties as necessary
7	The BUL or Designee should meet with Emergency Services to coordinate appropriate steps and assist as necessary.
8	If a site evacuation is necessary, initiate the Site Evacuation (Section 5.0)

5.0 SITE EVACUATION

5.1 Initiating Evacuation:

5.1.1 Area Manager or designee will use the radios, cell phones or other means to contact and inform all personnel at the site to evacuate.

- During this announcement, the Area Manager or Designee shall designate whether personnel should meet at the primary, secondary or an alternate muster point (off site)

5.1.2 Upon notification, all personnel at the site shall immediately:

- Stop work.
- Initiate emergency shut off procedures or If time permits, place equipment in a safe static condition.
- Evacuate from the nearest, safest exit point and report to the assembly area that was designated during the evacuation announcement in a) above. Refer to the site drawing and map (Attachment B).
- If for some reason personnel are unable to meet at the muster point that was designated during the evacuation announcement in a) above, they should find another muster point where they will be safe from the emergency and notify the Area Manager or designee of their location.

5.1.3 Personnel shall report their status to the Area Manager or designee when they have arrived at the designated muster point.

5.1.4 Area Manager or designee shall notify the NSPS Remote Operations Control Center that the site is being evacuated and the reason for the evacuation.

5.1.5 The NSPS Remote Operations Control Center shall make the following notifications sharing the information they received from the Area Manager.

- NSPS Remote Operations Control Center shall attempt to notify the Region Director of the site being evacuated and the reason for the evacuation. The Regional Director shall make appropriate notifications.
  - If the Region Director is unable to be contacted, the Remote Operations Control Center shall attempt to notify the VP of Operations Site is being evacuated and the reason for the evacuation.
  - If the VP of Operations is unable to be contacted, the NSPS Remote Operations Control Center shall attempt to notify the VP of QHSE that the Site is being evacuated and the reason for the evacuation.

5.1.6 NSPS Remote Operations Control Center shall follow “Outage Notification Procedures” as applicable.

5.1.7 Area Manager or designee should initiate other emergency action procedures herein as applicable.

5.1.8 Once the situation is stabilized and all personnel are accounted for, the Area Manager may send non-essential personnel home if warranted.

5.1.9 Area Manager/Designee shall provide updates of the situation to their Region Director and HSE Specialist.

5.2 Returning to Site from Evacuation:

5.2.1 The Area Manager or designee shall notify the Remote Operations Control Center prior to returning to site from evacuation.

5.2.2 Area Manager shall meet with appropriate site personnel to discuss the site re-entry method(s).

5.2.3 Prior to returning to site from the evacuation, the Area Manager shall discuss the status of the site with their Region Director.

5.2.4 Personnel entering should conduct a hazard assessment to determine potential hazards associated with re-entering the site and review this in meeting with all personnel involved prior to re-entering site.

5.2.5 Re-enter the site and perform an inspection of affected areas to identify any existing hazards and assess the status of the site.

- Correct the hazards on the spot if able.
- If unable to correct the hazards, mark/guard them using barrier tape, or other means and communicate these hazards to other personnel entering the site. Limit access to all non-essential personnel.

5.2.6 Once the site has been made safe for other personnel to enter, the Area Manager may allow access to the site.

5.2.7 The Area Manager or designee and the Region Director shall assess potential impact to business operations and take appropriate actions.

6.0 NOTIFICATION PROCESS

6.1 Area Manager should follow the Incident Investigation and Reporting Procedure and Incident Escalation and Review Procedure to ensure emergency is documented correctly and notifications are made.

6.1.1 Client (Owner) Notification – Client or Owner representatives shall be provided the details of all Site emergencies as soon as possible or as prescribed in the O&M contract/agreement.

6.1.2 Community/Authority Notification – The process for notification of stakeholders relates directly to the nature of the hazard.

- In the event that there is an unacceptable risk to the community from the emergency or incident, the impacted community stakeholders will be notified by the Area Manager
- OSHA will be notified by the HSE Department, if required
- Regulatory reporting to environmental agencies will be done by Environmental Program Manager, if required

7.0 INJURY RESPONSE

7.1 Minor Injury – No First Aid Required

Step	Action
1	Individuals who have been hurt, even if no first aid is required, or are having aches and pains need to report this to their Area Manager or Designee immediately.
2	Area Manager or Designee – Discuss injury with the Employee to determine if first aid is needed and if so, ensure the Employee receives appropriate care.
3	Area Manager or Designee – Notify Region HSE Specialist and report the injury in the HSE reporting system. Gather information to begin investigation including statements and pictures.
4	If the injury was caused by anything that could cause future injury, the hazard should be mitigated as soon as possible.

7.2 Minor Injury – First Aid Required

Step	Action
1	Prior to entering the area to render first aid, ensure it is safe to do so
2	If you choose to provide first aid, only provide first aid to the extent of your training
3	Immediately report the injury to the Area Manager or Designee.
4	Area Manager or Designee – discuss the injury & first aid that was rendered to determine if the Employee needs to be seen by a medical professional. If it is determined that the Team Member should seek medical attention, follow 5.3 below.
5	Area Manager or Designee – Notify Region HSE Specialist and report the injury in the HSE reporting system. Gather information to begin investigation including statements and pictures.
6	If the injury was caused by anything that could cause future injury, the hazard should be mitigated as soon as possible.

7.3 Injury requiring attention from a medical provider

Step	Action
1	Prior to entering the area to render first aid, ensure it is safe to do so
2	If you choose to provide first aid, only provide first aid to the extent of your training
3	Immediately report the injury to the Area Manager or Designee.
4	If individual experiences an electrical shock, it is mandatory that they be evaluated by a qualified medical provider
5	Have someone escort the Employee to the medical provider. (Avoid using a personal vehicle if possible).
6	Area Manager or Designee – Notify Region HSE Specialist and report the injury in the HSE reporting system. Gather information to begin investigation including statements and pictures.
7	Once the Team Member returns from the medical provider, obtain a copy of any paperwork indicating prescriptions/restrictions that the Employee may have received. E-mail copies of all paperwork to HR Business Partner and HSE Specialist.

8	If the injury was caused by anything that could cause future injury, the hazard should be mitigated as soon as possible.

7.4 Major Injury requiring emergency services

Step	Action
1	Notify Area Manager or Designee **Note**: *In a lone worker scenario, NSPS REMOTE OPERATIONS CONTROL CENTER may act as the Designee and assist with initiating the emergency action procedure.*
2	The Area Manager or Designee will Initiate the Emergency Action Procedure (Section 4.0) and call 911
3	Prior to entering the area to render temporary first aid, ensure it is safe to do so.
4	If you choose to provide first aid, only provide first aid to the extent of your training.
5	Meet and escort Emergency Services. Provide support to Emergency Services when requested.
6	When appropriate, Area Manager or Designee should notify the NSPS Remote Operations Control Center and provide any known details regarding the injury including whether emergency services has been called.
7	NSPS Remote Operations Control Center shall make any additional notifications as necessary so the BUL or Designee can continue managing the event on site.
8	If possible, have an Employee follow emergency services to the hospital for status updates.
9	Consult with HSE Department for any further steps, dependent on the severity of the injury.
10	When appropriate, Area Manager or Designee will report the injury in the HSE reporting system. Gather information to begin investigation including statements and pictures.
11	Preserve the injury scene as best as possible. If the injury was caused by anything that could cause future injury, the hazard should be mitigated as soon as possible.

8.0 HAZARDOUS MATERIALS RESPONSE

Step	Action
1	Evacuate the area, securing access to the area when possible.
2	Immediately inform the Area Manager or Designee of the situation. Provide as much information as possible.
3	If safe, remain in the immediate area and prevent others from being exposed to the chemicals until appropriate emergency services can arrive.
4	If it is determined that emergency services are needed, the Area Manager (or Designee) will initiate the emergency action procedure (Section 4.0) and assist the arrival of emergency vehicles.
5	Area Manager should contact HSE Specialist and Environmental Program Manager, as soon as possible.
6	When appropriate, Area Manager or Designee will report the injury in the HSE reporting system. Gather information to begin investigation including statements and pictures.

9.0 SPILL TO THE ENVIRONMENT

9.1 Small Controllable/Localized Spill

Step	Action
1	Notify the Area Manager or Designee immediately.
2	Determine the source chemical released.
3	Eliminate any unusual hazards and stop the source of the spill, if possible.
4	Wear PPE and clean up the release in accordance with the instructions from Safety Data Sheets (SDS).
5	Replenish used spill response equipment after use. (Client/owner may be responsible for purchasing)
6	Area Manager or Designee – Notify Region HSE Specialist and Environmental Program Manager. Report the spill in the HSE reporting system. Gather information to begin investigation including statements and pictures.

9.2 Significant Spills

Step	Action
1	Notify the BUL or Designee immediately and initiate the Emergency Action Procedure (Section 4.0) if necessary.
2	Immediately have all staff exit the affected area while preventing anyone from walking through the spill.
3	Gather as much information as possible and determine if anyone has been hurt or contaminated. Review the SDS for specific cleanup response and PPE that will be required.
4	If safe to do so, stop the source of the spill while exiting the area and use spill kit to contain.
5	DO NOT TRY TO CLEAN UP THE RELEASE. Qualified 3rd party personnel will be contacted.
6	A 3rd party spill response company will need to be contacted for the following scenarios: • If the spill is over the critical threshold as defined by the state of operations contact • If the spill may reach surface waters • If the spill has the potential to discharge off of the property: Consult with Environmental Program Manager.
10	Area Manager or Designee – Notify Region HSE Specialist and Environmental Program Manager. Report the spill in the HSE reporting system. Gather information to begin investigation including statements and pictures.

10.0 FIRE RESPONSE

Step	Action
1	If applicable, disconnect power to the affected equipment when it is safe to do so.
2	If fire is in the incipient stage, and you are trained and choose to do so, use fire extinguisher(s) to put the fire out. **NOTE:** *When fighting an incipient stage fire, ensure you maintain an unobstructed exit route. If the fire is extinguished, omit steps 3-7 below and notify the Area Manager or Designee of the event.*

3	If the fire is beyond the incipient stage, immediately evacuate the area, position yourself a safe distance from the fire and limit access to the area. **Electrical Equipment fires**: *During an equipment fire (inverter, transformer, etc.), ensure the equipment is de-energized when safe to do so and then set a perimeter at a safe distance around the equipment to help ensure the fire does not spread.*
4	Notify Area Manager or Designee
5	The Area Manager or Designee will Initiate the Emergency Action Procedure (Section 4.0) and call 911. Emergency services will fight the fire. **Electrical Equipment Fires:** *Do NOT allow the fire department to apply water to electrical equipment until the affected equipment has been safely de-energized.* • *If the equipment cannot be de-energized, then the role of the fire department is to prevent the spread of the fire.*
6	Area Manager or Designee to initiate a Site Evacuation (Section 5.0) as necessary
7	When appropriate, Area Manager or Designee should notify the NSPS Remote Operations Control Center and provide any known details regarding the fire including whether emergency services have been called.
8	NSPS Remote Control Operations Center shall make any additional notifications as necessary so the Area Manager or Designee can continue managing the fire event.
9	Do not allow access to the affected area until it is safe. Mark the restricted area with barrier tape or by other means.
10	Area Manager or Designee – Notify Region HSE Specialist. Report the fire in the HSE reporting system. Gather information to begin investigation including statements and pictures.

11.0 SEVERE WEATHER RESPONSE

11.1 Weather Monitoring

11.1.1 Employees should continually monitor severe weather conditions using weather website/app or local forecasting/warnings via AM/FM radio.

11.2 Lightning Storm

11.2.1 When lightning is within a 30-mile radius of the work location (by either notification or observation) and approaching, the following actions are required:

- Continue to closely monitor lightning activity as it approaches
- Prepare to shut down all activities and begin securing equipment as necessary.

- Identify shelter and prepare to move to it.

11.2.2 When lightning is within a 15-mile radius of the work location (by either notification or observation) and approaching, the following actions are required:

- Cease all outdoor aerial (working at heights) & crane work activity
- Begin securing equipment if applicable.
- Continue to closely monitor lightning activity as it approaches

11.2.3 When lightning is within a 10-mile radius of the work location (by either notification or observation) and approaching, the following actions are required:

- Cease all outdoor work activity
- Evacuate to a designated shelter (such as a service vehicle or office building) and report your location to the Area Manager or Designee.

11.2.4 Outdoor work activity shall not resume until lightning activity has been verified to be moving away from the work location and is confirmed to be more than 10 miles from the work location.

11.3 Tornados

11.3.1 If a tornado warning has been issued or a tornado/funnel cloud has been spotted.

- Seek shelter Immediately
- notify the Area Manager or Designee of an approaching tornado

11.3.2 If a tornado watch is issued: Conditions should be closely monitored, and work schedules adjusted accordingly

11.3.3 Area Manager or Designee should initiate the Emergency Action Procedure (Section 4.0) and notify all Employees onsite that a tornado is approaching and for people to take shelter.

11.3.4 Seek shelter in a designated tornado shelter on site if available

11.3.5 If you are out on site and unable to assemble at the tornado shelter, perform the following:

- If time permits, communicate your location to the Area Manager or designee.
- Avoid areas near vehicles or where there are trees and structures.
- Exit from your vehicle.
- Lay flat in a low-lying area in the ground such as a ditch, culvert or other depression.
- Cover your head with your hands.

11.3.6 If you are in a building and unable to assemble at the tornado shelter, perform the following:

- If time permits, communicate your location to the Area Manager or designee.
- Move to an interior room within the building, on the first floor, away from any windows or items that can fall.

- Crouch down and cover yourself from falling debris. Avoid areas where there are heavy objects on the floor directly above you.
- For added protection, it is a good idea to get under a heavy table or workbench.
- Cover your head with your hands.

11.3.7 Never attempt to outrun a tornado in your vehicle

11.4 Earthquakes

11.4.1 The Area Manager or Designee shall initiate the applicable steps of the Emergency Action Procedure (Section 4.0), if necessary.

11.4.2 If in a building:

- Attempt to take cover under a heavy desk or table. It can provide an air space for you if the building collapses. If the table moves, attempt to move with it.
- If cover is not available, go to an inner corner or doorway, away from windows or glass panels.
- Stay away from glass, hanging objects or bookshelves or large furniture that may fall.
- Grab something to shield your head and face from falling debris and broken glass.
- If the lights go out, use a flashlight. Don't use items with open flames as it is likely that an earthquake can result in gas leaks.
- Remain in the safe location until the earthquake subsides.

11.4.3 If outdoors:

- Stop all work, exit arrays and hot areas, and proceed to nearest muster point
- Move away from structures and overhead power lines.
  - The greatest danger from falling objects is immediately outside of a structure.
- Move to an open area.
- Drop to your knees into a fetal position, close your eyes, and cross your arms over the back of your neck for protection.
- Remain in this position until shaking stops.

11.4.4 If in a vehicle:

- Immediately pull over and stop the vehicle. Park away from structures, overhead power lines and under/overpasses.
- After stopping your vehicle, set the parking brake and turn on your radio to obtain emergency broadcast information.
- Remain in your vehicle until the earthquake subsides, this will provide you with shelter.
- While driving away after the earthquake, watch for hazards such as breaks in the pavement, downed power lines and other obstructions in the roadway.

11.4.5 Securing from an earthquake:

- Once the site has been made safe for other essential personnel to enter, the Area Manager may allow access to the site.
- Area Manager or designee should keep notes of occurrences so that lessons learned can be understood and communicated.
- Area Manager or designee shall inform the NSPS Remote Operations Control Center when secured from earthquake.

11.5 Storm, Wind

11.5.1 If driving, assess conditions and try to pull off the road in a sheltered location.

- Avoid trees, power lines and other objects that may be displaced by the wind.

11.5.2 If on site, seek shelter in a designated shelter location (Office building, PCS Shelter, tornado shelter, vehicle etc.)

11.6 Storm, Dust

11.6.1 If driving, pull off the side of the road and park clear of traffic.

- Stay with your vehicle.

11.6.2 If on the site and able, seek shelter in a designated shelter location (tornado shelter, office building, PCS shelter, etc.)

11.6.3 If on the site and unable to avoid the storm, shelter in your vehicle.

11.7 Storm, Heavy Rain or Flash Flood

11.7.1 If traveling, assess conditions and adjust traveling speed accordingly.

11.7.2 If traveling and water is rising, seek high ground and shelter in your vehicle.

- DO NOT try to cross portions of roadways covered by water. Wait until water flows subside to assure that the roadway is intact and that no current can sweep away your vehicle.

11.7.3 If on site, seek shelter in a designated shelter location (Office building, PCS Shelter, tornado shelter, vehicle on high ground etc.)

11.7.4 Area Manager or Designee to initiate a Site Evacuation (Section 5.0) as necessary

11.7.5 If off site, seek high ground if sheltering in a vehicle.

- Stay clear of electrical devices, poles, breakers, and overhead lines.
- DO NOT try to drive through low-lying areas that are covered with water.
- DO NOT return to the site until conditions allow safe access.

11.8 Hurricane Response

11.8.1 Pre-hurricane season

- Review this plan and discuss specific actions that would be necessary in the event that a hurricane impacts the site.

- Designate key personnel duties in case of a hurricane

11.8.2 Hurricane Watch has been issued (48-72 hours before landfall):

- When appropriate, the Area Manager or designee shall initiate a Site Evacuation (Section 5.0)
  - At no time should anyone be allowed to stay at the site during a hurricane.
  - Ensure evacuation routes are safe for travel prior to evacuating.
- All sites in the projected/surrounding area should be shut down and equipment moved/protected.
- Provide documentation on job's progress and delays due to the hurricane preparation
- Email and phone communications should begin at this stage to update all personnel on weather conditions and office hours/closures

11.8.3 Hurricane Watch (36-48 hours before landfall):

- Area Manager/Designee to provide communications with local office assistance should continue by regular email updates to key personnel.
- Utilize the contact list for the site and a hierarchy of communication tools in the following order: Phone, Email, & Text
- Project protection activities shall continue and the "pre storm checklist" shall be finalized & completed ASAP (if not already complete).
- Personnel shall be allowed ample time to protect their own property.
- Early evacuation of employees, in evacuation areas, is encouraged due to extreme traffic congestion
- Caution employees to study evacuation routes where they live prior to evacuating

11.8.4 Hurricane Warning is issued (36 hours or less before landfall):

- Area Manager or Designee shall continue to email situation updates to personnel and shall post the communication on information systems.
- If not already completed, ensure all remaining site employees/members of the critical operations crew are released to attend to personal matters
- NSPS Remote Control Operations Center, Region Director and Region HSE Specialist shall be notified upon departure of the last employee(s) from their respective sites

11.9 Securing From a Severe Weather Event

11.9.1 Area Manager should determine the status of facilities and appropriate timing of returning to work

11.9.2 Review the security and safety of the jobsite(s), complete risk assessment and review with personnel that will be entering the site.

11.9.3 Evaluate and document any damages.

11.9.4 List all equipment and materials that have been damaged.
11.9.5 Photograph or videotape damage to completed work or fabricated items.
11.9.6 Consult with Region Director and Business Compliance Manager to determine what information and documentation is necessary for any insurance claims and to determine how you should proceed with clean up and re-work.
11.9.7 Record all costs encountered in cleanup of the jobsite, re-work of completed work, and repair/replacement of equipment and materials.
11.9.8 Document all delays, and loss of energy output caused by the severe weather event.
11.9.9 For chemical or electrical damage, immediately contact your HSE Specialist for guidance on how to address.

12.0 WORKLPLACE VIOLENCE / ACTIVE SHOOTER

12.1 Please refer to Workplace Violence Prevention & Response Plan

13.0 SECURITY THREAT

13.1 If theft or vandalism is noticed on site, perform the following:

13.1.1 Notify Area Manager or Supervisor
13.1.2 Area Manager or Designee to notify the customer ASAP.
13.1.3 Area Manager or Designee to contact the local authorities to file a police report
13.1.4 Secure the scene and take pictures as applicable
13.1.5 Report incident in HSE Reporting System

13.2 In the event that unauthorized individuals are found onsite, perform the following:

13.2.1 If the individuals are not immediately recognized (subcontractor, owner rep, land owner, etc.) Do not attempt to approach the individuals
13.2.2 Notify Area Manager or Designee
13.2.3 Area Manager or Designee to notify the customer ASAP.
13.2.4 Report incident in HSE Reporting System

14.0 BOMB THREAT

14.1 In the event of a bomb threat received by telephone:

14.1.1 Remain calm - obtain and document as much information as possible from the caller.
14.1.2 Do not hang up the phone until the caller hangs up.
14.1.3 Notify the Area Manager or Designee that a bomb threat was called in.
14.1.4 Area Manager or Designee should consider initiating the Emergency Action Procedure (Section 4.0) and/or Site Evacuation (Section 5.0) above if appropriate.
14.1.5 Call 911 to report the information collected from the caller and follow any instructions given by the emergency personnel.

14.2 If suspicious object is found:

14.2.1 Move away from the object and do not touch it.
14.2.2 Do not transmit by radio or cell phone while near the object.
14.2.3 Notify the Area Manager or designee of the following:

- Your name and the location of the object
- A description of the object
- Other information regarding the object that is known.

14.2.4 Area Manager or designee - Initiate the Emergency Response Procedure (Section 4.0)
14.2.5 Area Manager or designee - initiate Site Evacuation (Section 5.0), if appropriate.
14.2.6 Area Manager or designee and the NSPS Remote Operations Control Center shall follow Sabotage Reporting Procedures (Section 15.1.6-15.1.7), as applicable
14.2.7 Area Manager or Designee in conjunction with Emergency Services Personnel shall coordinate appropriate steps to be taken.
14.2.8 When time permits, the Area Manager or Designee shall provide the Region Director with updates of the situation.
14.2.9 Incident should be reported in HSE Reporting System.

14.3 Secure from Bomb Threat

14.3.1 When Emergency Services has indicated to the Area Manager or Designee that the threat no longer exists, the Area Manager shall notify the Region Director and the NSPS Remote Operations Control Center that the Site is securing from the bomb threat.
14.3.2 Area Manager or Designee may then allow normal access to the site.

15.0 SABATOGE

15.1 When a sabotage event has occurred or other physical threat is occurring, perform the following steps:

15.1.1 If the saboteur is still at the site DO NOT MAKE PHYSICAL CONTACT.
15.1.2 Immediately notify the Area Manager or Designee and give a description of the individual, their location, and maintain visual contact if this can be done safely.
15.1.3 Area Manager or designee shall initiate the Emergency Action Procedure (Section 4.0)

- The Area Manager or designee shall call 911 and relay all pertinent information to local law enforcement.

15.1.4 Area Manager or designee shall initiate Site Evacuation (Section 5.0) if appropriate.
15.1.5 Area Manager or designee - Notify the NSPS Remote Operations Control Center (when time permits)

- Include site name and any known details regarding the sabotage damage or physical threat event and that emergency response personnel have been called.

15.1.6 The NSPS Remote Operations Control Center shall immediately notify the Business Compliance Manager and VP of QHSE of the sabotage or physical threat event.

15.1.7 The Area Manager or designee, NSPS Remote Operations Control Center (NSCR), and the NERC Program Manager shall follow Event Reporting Procedures pursuant to NERC Standard, EOP 004-4, and the NSPS NERC EOP-004 Event Reporting Operating Plan Procedure, as applicable.

15.1.8 Area Manager or designee in conjunction with Emergency Services Personnel shall coordinate appropriate steps to be taken.

15.1.9 When time permits, the Area Manager or designee shall provide the Region Director with updates of the situation.

15.1.10 Document the incident in the HSE Reporting System.

15.2 In the event that a sabotage threat is received by telephone:

15.2.1 Remain calm - obtain and document as much information as possible from the caller.

15.2.2 Do not hang up the phone until the caller hangs up.

15.2.3 Notify the Area Manager or designee with any information the caller provided.

15.2.4 Continue following the steps outlined in section 14.1 above (bomb threat by phone)

15.3 If a suspicious object is found, follow applicable steps of the bomb threat procedure above.

15.4 Secure from sabotage:

15.4.1 When Emergency Services has indicated to the Area Manager or designee that the threat no longer exists, the Area Manager shall notify the Region Director and the NSPS Remote Operations Control Center that the site is securing from the sabotage event.

15.4.2 Area Manager or Designee may then allow normal access to the site.

16.0 CYBER SECURITY EVENTS

16.1 In the event suspicious cyber activity is identified, the Area Manager or Designee shall perform the following:

16.1.1 Immediately notify the Region Director and provide information regarding the impact to the site.

16.1.2 Immediately notify the NSPS Remote Operations Control Center of the situation and request assistance as necessary.

16.1.3 The NSPS Remote Operations Control Center notifies IT of the situation and request assistance as necessary.

16.1.4 Area Manager or designee shall work with IT support to isolate the affected system/s as necessary.

16.1.5 IT and applicable personnel will utilize the IT incident response plan to resolve the possible incident.

16.1.6 IT Cyber Incident response team will determine if the event is reportable per the IT Incident Response Plan.

16.1.7 Area Manager or designee will work with IT to preserve any evidence related to the possible incident.

16.1.8 IT will continue communications with the Area Manager or designee until the issue is resolved.

16.1.9 Upon resolution, the NSPS Remote Operations Control Center and the Regional Manager will be notified.

17.0 RECORDKEEPING REQUIREMENTS

17.1 This plan shall be reviewed annually at a minimum.

18.0 TRAINING

18.1 All NSPS Employees shall receive training on this procedure initially and annually thereafter.

18.2 Contractors/Visitors shall receive training on the applicable portions of this plan during the Site-specific safety orientation.

18.2.1 The training shall provide these personnel with appropriate information such that they will know what to do in the event of an emergency.

18.2.2 The following emergency procedures and topics shall be covered in the Site safety orientation:

- Locations of muster points (i.e. emergency assembly areas)
- Pre-determined routes used to reach muster points
- Procedures to follow in the event of specific emergency situations
- Locations of fire extinguishers and first aid kits
- Site emergency contact information; and
- Details of equipment to be utilized during emergencies – Alarm stations, air horns, two-way radios and firefighting equipment.

19.0 APPENDICES/ATTACHMENTS

19.1 Attachment A – Emergency Contact List Template

19.2 Attachment B – Site Maps Examples

19.3 Attachment C – After Action Review Template

Emergency Contact List, Section 4.0, Attachment A

Emergency Contact List

Call 911

for Life-Threatening Emergency

Site Name	Imperial Solar Energy Center West	Coordinates:
Address	3020 West County Rd. Seely, CA, 92273	32.771812, -115.781477
Directions	8 West / Dunaway rd. Seeley, CA 92273	

SITE CONTACTS	Name	24 Hr Contact Number
Manager or Supervisor	Samuel Arevalo	760-996-1963
Secondary Contact	Jose Garcia	760-996-2007
Secondary Contact	Luis Ceceno	760-996-2408

RESPONSE	Name	Location	Contact Number(s)
Police	El Centro Police Dep.	150 N 11th St, El Centro, CA 92243	911
Sheriff	Imperial County Sheriff	328 Applestill Rd, El Centro, CA	911, 442-265-2021
Fire	Imperial County Fire Dept	1862 W. Evan Hewes Highway, Seeley CA 92273	911, 442-265-7571
Hospital(s)	El Centro Regional Med. Center	1415 Ross Ave, El Centro, CA 92243	911, 760-339-7100
Clinic(s)	All Valley Urgent care	2026 N Imperial Ave, El Centro, CA 92243	760-592-4351
Poison Control	Poison Control	https://www.poison.org/	1-800-222-1222

NovaSource	Name	Contact Number(s)
NSCR Operations Center	24 Hour Control Room	(877)375)7662
Area Manager	Luis Carlos	760-909-0882
EHS Specialist	Kelsey Bartges	+1 651-421-2187
EHS Manager	Megan Winchell	832-819-9307

OTHER	Name	Contact Number(s)
EPA or other Spill Control Agency	Environmental Protection Agency	800-621-8431
FBI Office	Federal Bureau of Investigation	(858) 320-1800
CAL OSHA Office	State Office	(833) 579-0927
Call-Before-You-Dig	MISS DIG	811
Department of Toxic Substances Control	Imperial CUPA-DTSC	760-352-0381

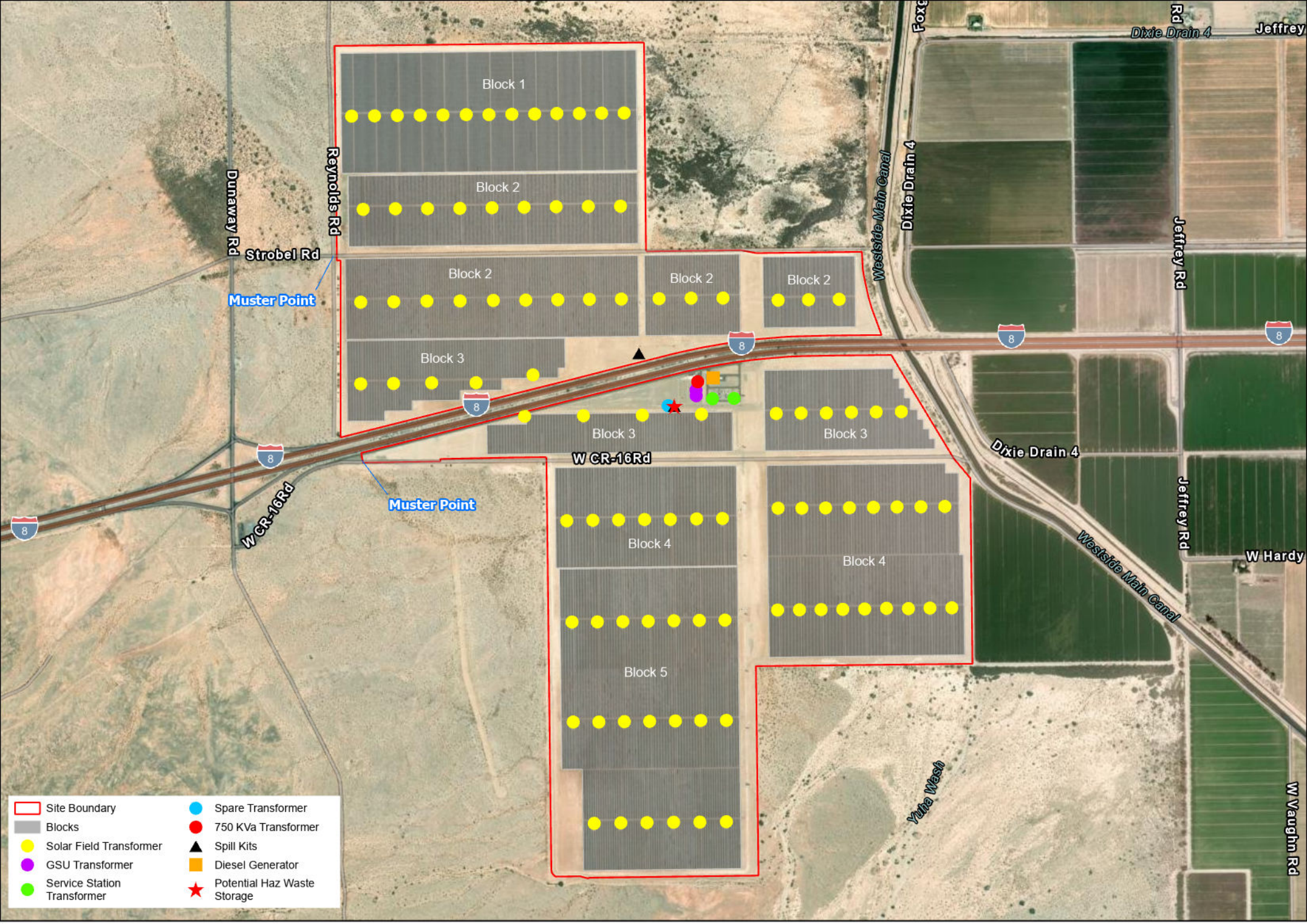

Figure 1
Facility Map

0 1,000 2,000 Feet

CSOLAR IV WEST, LLC

Aerial Imagery: Esri Community Maps Contributors, California State Parks, Esri, TomTom, Garmin, Foursquare, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA, USFWS, Maxar

November 2024

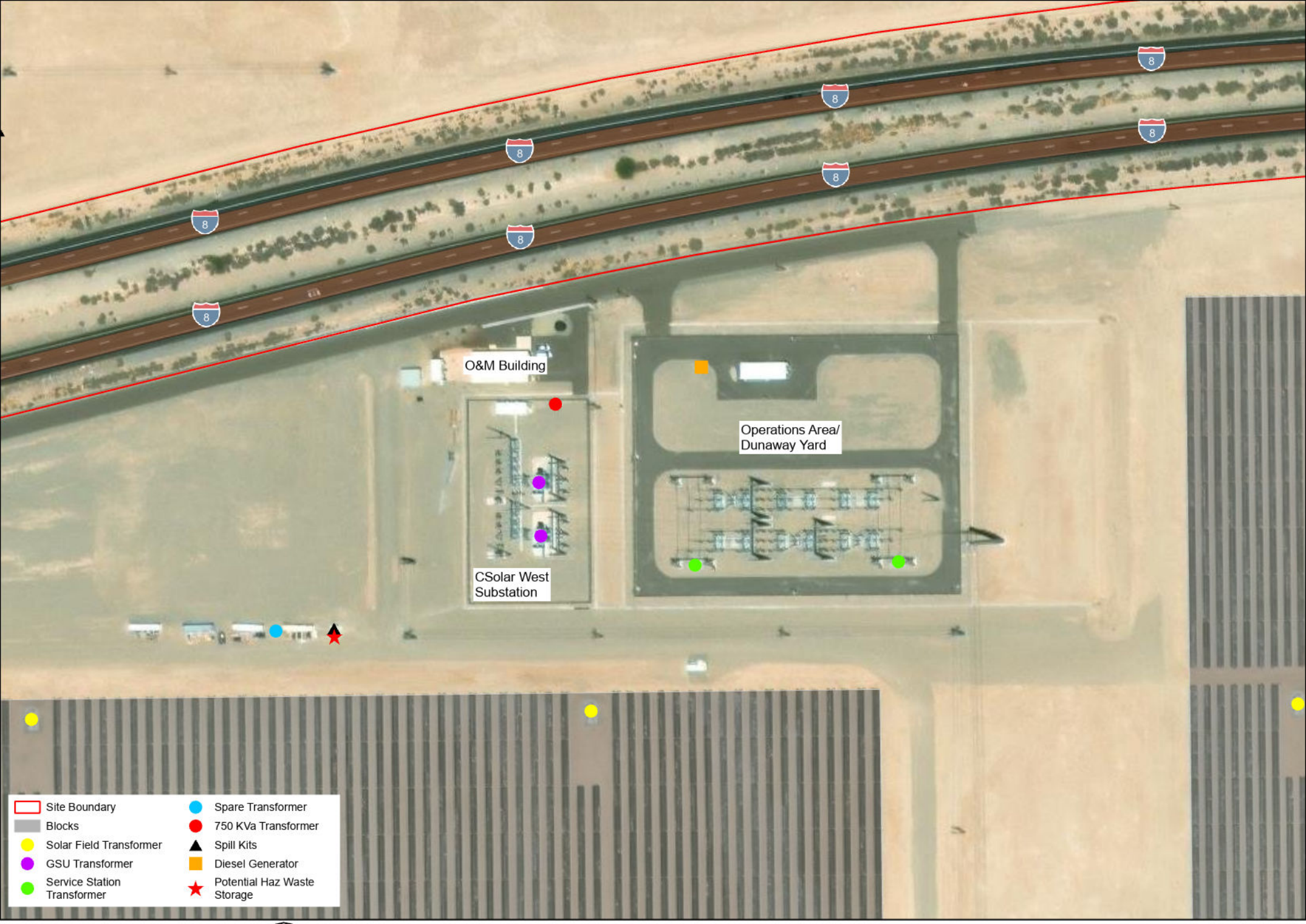

Figure 2
Facility Map

0 100 200 Feet

CSOLAR IV WEST, LLC

Aerial Imagery: Esri Community Maps Contributors, California State Parks, © OpenStreetMap, Microsoft, Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, MFTI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA, USFWS, Maxar

November 2024

Finding 8 Documents

NSPS CIP-003 LOW IMPACT COMPLIANCE POLICY

Document Control / History Information

Department(s):	**Compliance**
Subject:	**NSPS CIP-003 Low Impact Compliance Policy**
Storage location:	2025 Repository

Prepared By:

Name	**Signature**	**Date**
Andrea Harkins	Andrea Harkins	4/9/2025

Approved By:

Name	**Signature**	**Title**	**Date**
Samir Seth	Signed by: Samir Seth D47799B90263481...	CIP Senior Manager	4/9/2025

Document Revision History

Rev #	**Revision/Review Date**	**Revision/Review Made By**	**Description of Changes / Comments**
0.0	4/9/2025	Andrea Harkins	Initial Corporate Level Policy; replaces site specific policy

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Finding 9 Documents

NOVASOURCE™
POWER SERVICES

Project Name: ISEC-West

Training Locations: TEAMS meeting

Date 6/12/2025

Time: 0800

Topics Overview REFRESHER TRAINING.

1. **Work Order Details: Understanding all parts of a work order, including scope, instructions, and adding proper troubleshooting or completed work details.**
2. **Work Order Completion: Procedures for properly completing and closing work orders.**
3. **JHA (Job Hazard Analysis): Identifying hazards, risk assessments, and mitigation plans before work starts. Adding JHA to work order.**
4. **Pre-Job Briefing: Communicating job scope, hazards, safety measures, and roles before beginning work.**
5. **Keeping Records: Proper documentation and record-keeping of all work activities, training, and inspections.**

Participants Sign in sheet

Name	Position
Jose Lopez	Field Tech II
Ivan Ibarra	Field Tech II
Jesus Roth	Field Tech III
Manuel Antunez	Field Tech I
Jose Garcia	Field Tech III
Luis Ceceno	Field Tech II

JHA-0434313

NOVASOURCE™ POWER SERVICES

Service Territory: East San Diego (El Centro), CA Area

Generated by: samuel arevalo

Account Type: Utility Power Plant

Work Type: UPP - PM - Rounds

Account Name:

Issue Description: IVW1 - 5/30 - Weekly Rounds

Region: SoCal

Priority: 6 - Safety/Environmental/Contractual

Territory: West

RISK ANALYSIS	LIKELIHOOD			
CONSEQUENCES	VERY LIKELY (VL): Could Happen Anytime	LIKELY (L): Could Happen Sometime	UNLIKELY (U): Could Happen, But Isn't Likely	VERY UNLIKELY (VU): Could Happen, But Probably Won't
CRITICAL (C): Fatal or Permanent Disability	HIGH	HIGH	HIGH	MEDIUM
MAJOR (MJ): Long Term Illness or Serious Injury	HIGH	HIGH	MEDIUM	MEDIUM
MODERATE (MO): Medical Attention and Several Days Off	HIGH	MEDIUM	MEDIUM	LOW
MINOR (MI): First Aid Needed	MEDIUM	MEDIUM	LOW	LOW

Step	Risk	Risk Rating	Control Measure	Controlled Risk Rating
Drive to work locations.	Vehicle Hazards	Consequence: Minor Likelihood: Very Unlikely Rating: Low	Always use seat belt Never use cell phone while driving Observe all speed limits and adjust for weather conditions Be aware of all personnel working and driving in the field When possible, always exit an area by driving forward If backing up is required, use a spotter when possible When parking in a lot, always back into	Consequence: Minor Likelihood: Very Unlikely Rating: Low

			parking spot upon arrival	
Perform visual checks and record data for technician rounds.	Possible exposure to arc flash	Consequence: Moderate Likelihood: Very Unlikely Rating: Low	No exposed metal on person (remove rings and jewlery) Use insulated tools Wear proper electrical safety PPE and Arc rated clothing at all times Maintain arcflash boundaries during evoltions that could cause an arcflash. Second person must be present & standing outside of the arc flash boundary with a shepherd's hook or other safe means of release Safety second must be wearing identical PPE as the tech performing the scan If in a shelter, 2 means of egress with doors in the open position If in a shelter, egress pathways must be clear of obstacles Follow instructions listed on the arc flash label	Consequence: Minor Likelihood: Very Unlikely Rating: Low
			Be aware of where you are stepping before you step Watch out for	

	Erosion - Uneven surfaces	Consequence: Minor Likelihood: Very Unlikely Rating: Low	erosion while driving vehicles. When in doubt, walk it out Use a spotter when backing up or navigating erosion when nessessary Never enter erosion without first assessing and reporting your location Be on the look out for any exposed underground cabling Avoid erosion when possible Avoid driving through mud when possible	Consequence: Minor Likelihood: Very Unlikely Rating: Low
Met station inspection, tipping rain bucket, cleaning pyranometers.	Erosion - Uneven surfaces	Consequence: Moderate Likelihood: Likely Rating: Medium	Be aware of where you are stepping before you step Watch out for erosion while driving vehicles. When in doubt, walk it out Use a spotter when backing up or navigating erosion when nessessary Never enter erosion without first assessing and reporting your location Be on the look out for any exposed underground cabling Avoid erosion when possible Avoid	Consequence: Minor Likelihood: Unlikely Rating: Low

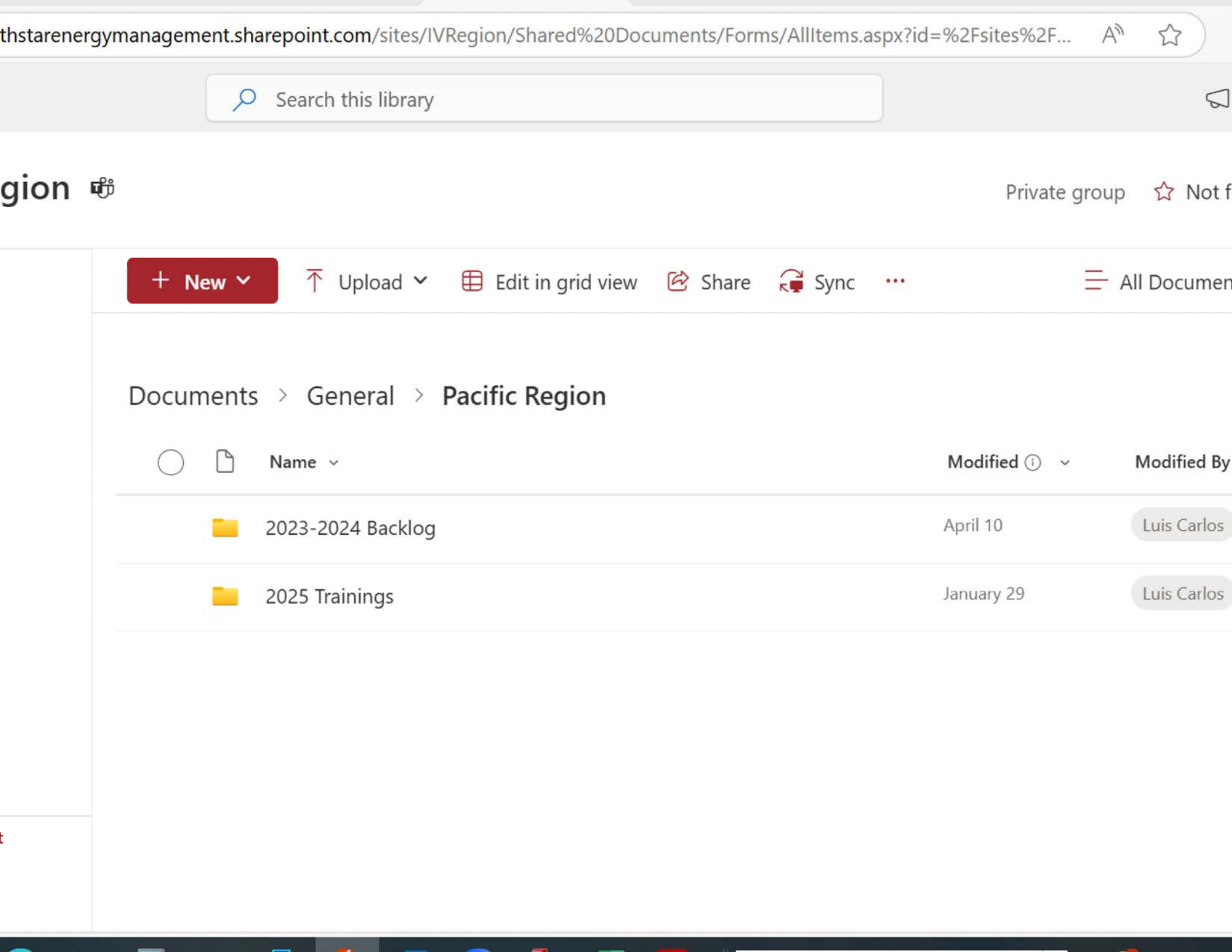
			driving through mud when possible	
	Fall Hazard - Ladder Use	Consequence: Moderate Likelihood: Likely Rating: Medium	Evaluate ground to ensure good footing to support ladder stability Do not shift center of gravity beyond ladder boundary (belt buckle rule) Use proper body mechanics Maintain 3-point contact while climbing or descending the ladder Use only Type 1A or 1AA step ladders Ladder must be fiberglass Do not use a defective ladder Stand no higher than the second rung from the top of the step ladder	Consequence: Moderate Likelihood: Very Unlikely Rating: Low
			Personnel must be in proper PPE as identified on arc flash label or as required by procedure Maintain arc flash and shock protection boundaries Use Insulated tools Ensure you are trained and qualified to work on the system Utilize electrical insulating gloves	

Substation Inspection	Shock Hazard	Consequence: Moderate Likelihood: Unlikely Rating: Medium	with leather protectors, EH rated boots LIVE - DEAD - LIVE checks inside ALL cabinets to worked in Never work on live electrical equipment. De-energize, LOTO and apply grounds as necessary to render the area an equal-potential zone. Second person must be present & standing outside of the arc flash boundary with a shepherd's hook or other safe means of release	Consequence: Minor Likelihood: Very Unlikely Rating: Low

JHA-0434313

Signer	Company	Email	Phone	Date

Finding 10 Documents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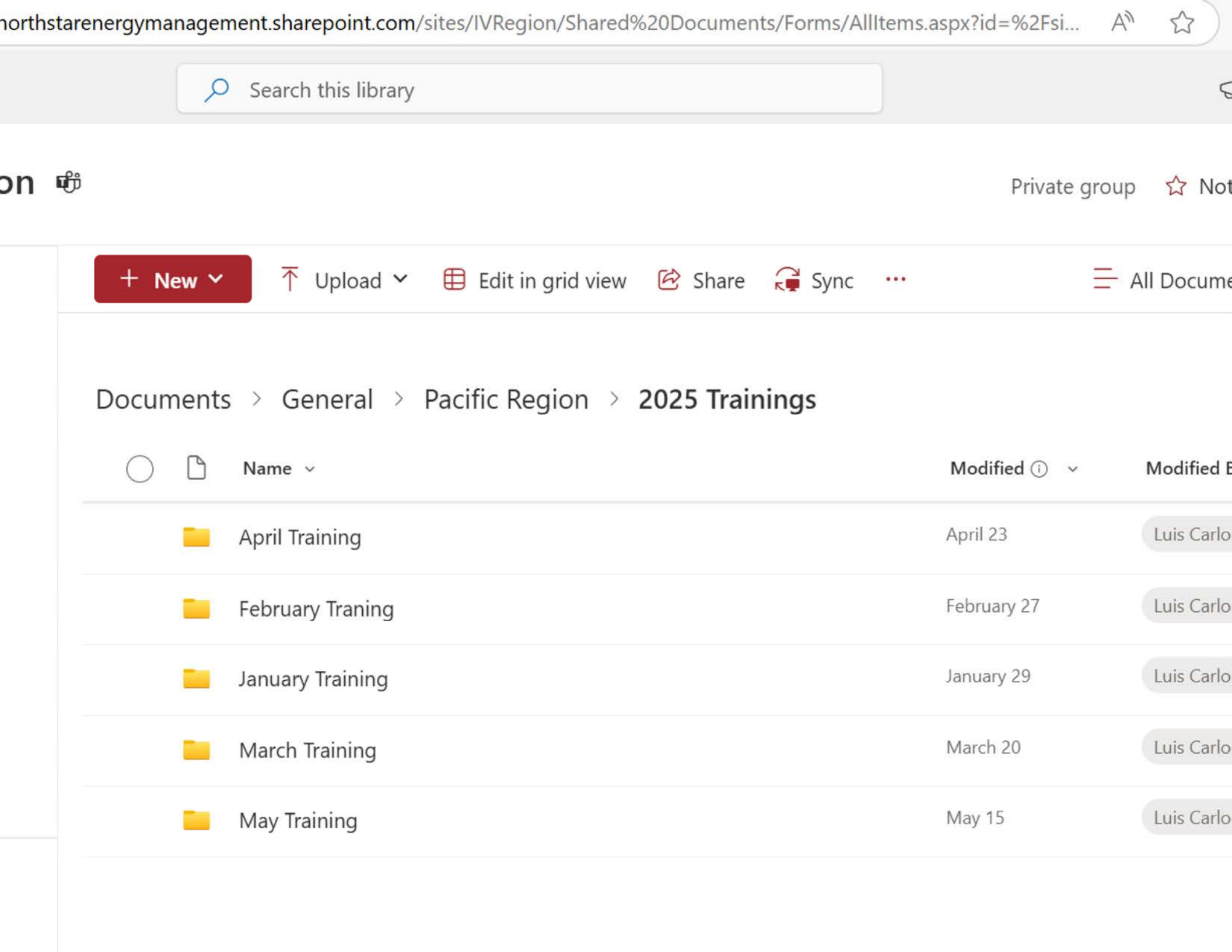
Luis Carlos
2025 Trainings
January 29
Luis Carlos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2025 Trainings
Name
Modified
Modified B
April Training
April 23
Luis Carlo
February Traning
February 27
Luis Carlo
January Training
January 29
Luis Carlo
March Training
March 20
Luis Carlo
May Training
May 15
Luis Carlo

Finding 12 Documents

NOVASOURCE™
POWER SERVICES

Contractor Spot Check Checklist

Project Name: _____

Location: _____

Date of Spot Check: _____

Time: _____

Checked By (Name & Position): _____

Contractor Company Name: _____

Item #	Inspection Item	Yes	No	Comments
1	Site safety orientation completed for all workers	☐	☐	
2	All workers are wearing appropriate FR PPE (hard hat, vest, eyewear, gloves, etc.)	☐	☐	
3	All workers are trained and/or certified for the work they are performing	☐	☐	
4	Job Hazard Analysis (JHA) and Pre-Job Brief conducted before work start	☐	☐	
5	Tool and equipment are rated, in good condition, and appropriate for the task (voltage-rated, insulated, correct type)	☐	☐	
6	Work is being performed in accordance with project specifications and drawings	☐	☐	
7	Materials used are approved, in good condition, and stored properly	☐	☐	
8	Housekeeping: work area is clean, orderly, and free of hazards	☐	☐	
9	Proper Lockout/Tagout, signage and barriers in place (if applicable)	☐	☐	
10	Environmental controls in place (dust, stormwater, erosion, SPCC & spill prevention kits)	☐	☐	
11	Any violations or unsafe conditions observed?	☐	☐	
12	Confirmed all site forms and plans are onsite including project safety log for inspection or audits	☐	☐	

Additional Notes or Corrective Actions Required:

- _____

- _____

- _____

Signature (Inspector): _____

Date:_____

Finding 13 Documents

Hazardous Materials Identification

By Jonathan Hart
05-Nov-2021

There are boundless amounts of hazardous materials that present increased risks to people exposed to them, whether building occupants, people in nearby structures, or first responders. These materials vary greatly in their composition and physical states. The risks, or hazards, associated with these materials are even more varied and must be assessed for a particular material in the state and manner in which it will be stored or handled. With such a wide range of materials and hazards there is also great diversity in construction requirements, fire protection systems, handling and operations, and response tactics associated with these materials. Here we will focus on the system of markings that provides a general idea of how hazardous materials need to be identified.

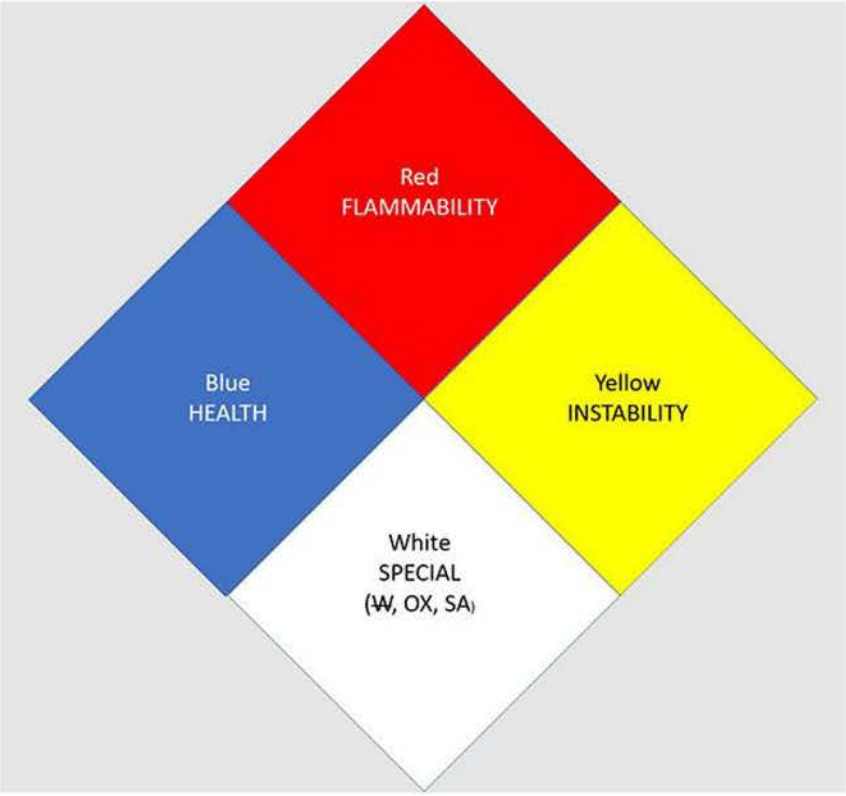
What is a hazardous material?

Before discussing the specifics of hazardous materials identification, it can be beneficial to know what is considered a hazardous material. Hazardous materials are defined in NFPA codes and standards as chemicals or substances that are classified as a physical hazard or a health hazard. Physical hazard materials are those classified as an explosive, flammable cryogen, flammable gas, flammable solid, ignitible liquid, organic peroxide, oxidizer, oxidizing cryogen, pyrophoric, unstable (reactive), or water-reactive material. Health hazard materials are those classified as a toxic, highly toxic, or corrosive material.

How do hazardous materials need to be identified?

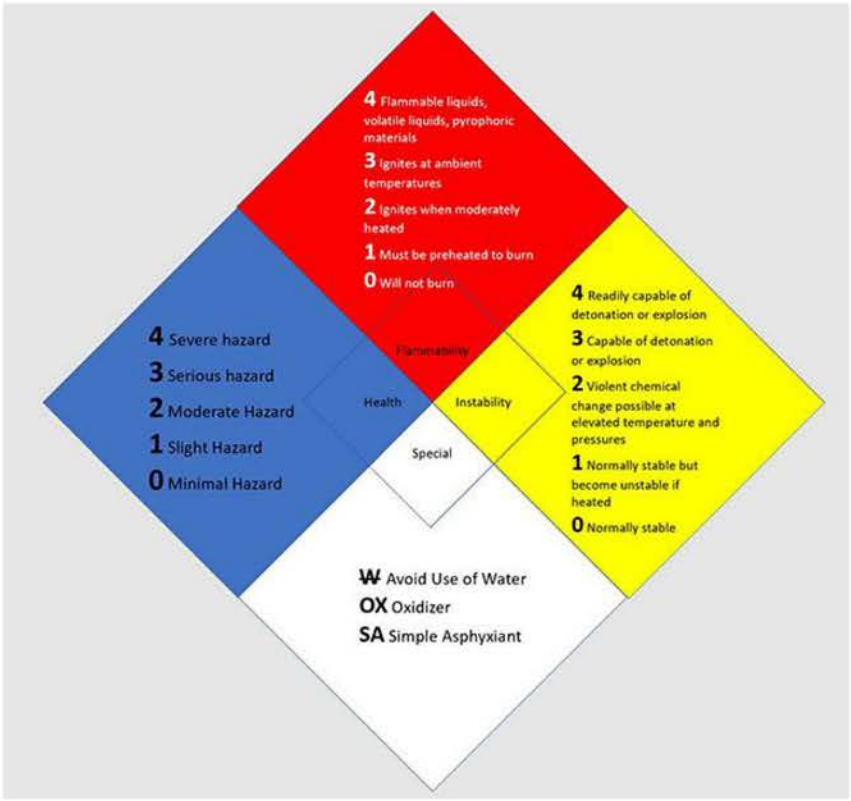
NFPA 704, *Standard System for the Identification of the Hazards of Materials for Emergency Response*, specifies the identification requirements for these materials. NFPA 704 applies when another Federal, state or local regulation or code requires its use. NFPA 704 does not specify when a container, tank or facility must be labeled rather it specifies how to label when another code, standard or an AHJ (Authority Having Jurisdiction, such as the local fire department) requires such labeling. The standard applies to industrial, commercial, and institutional facilities that manufacture, process, use, or store hazardous materials. It does not apply to transportation, use by the general public, and a few other specific uses.

The purpose of the standard is to provide a simple, readily recognized, and easily understood system of markings that provides a general idea of the hazards of a material and the severity of the hazards as they relate to emergency response. The identification system specified in NFPA 704 is intended to enable first responders to easily decide whether to evacuate the area or to commence emergency control procedures and to also provide information to assist in selecting firefighting tactics and emergency procedures.

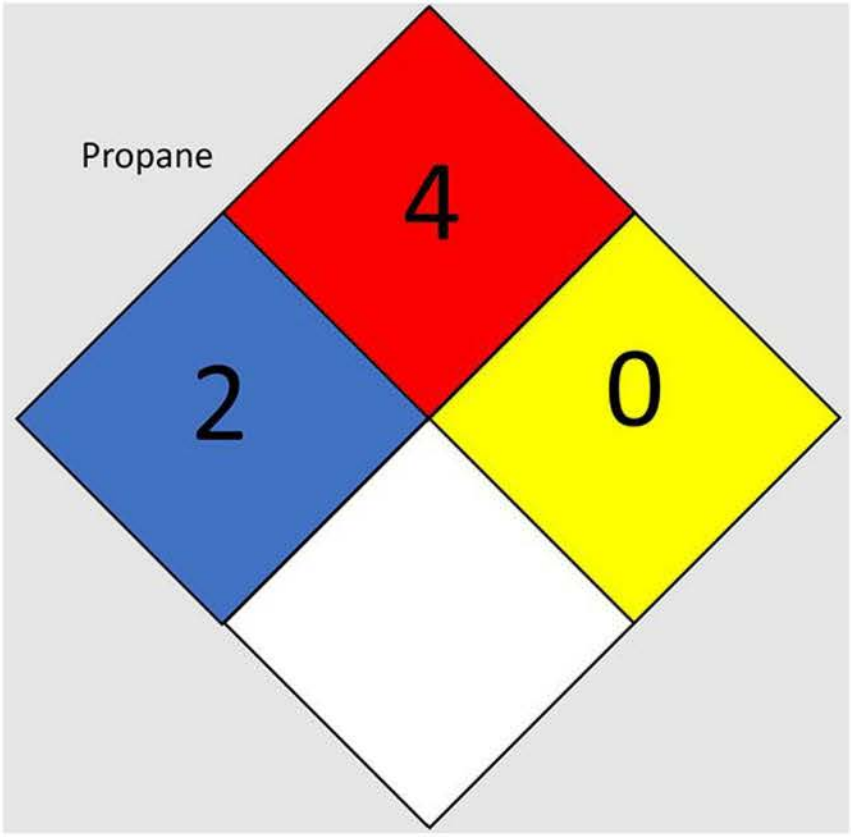


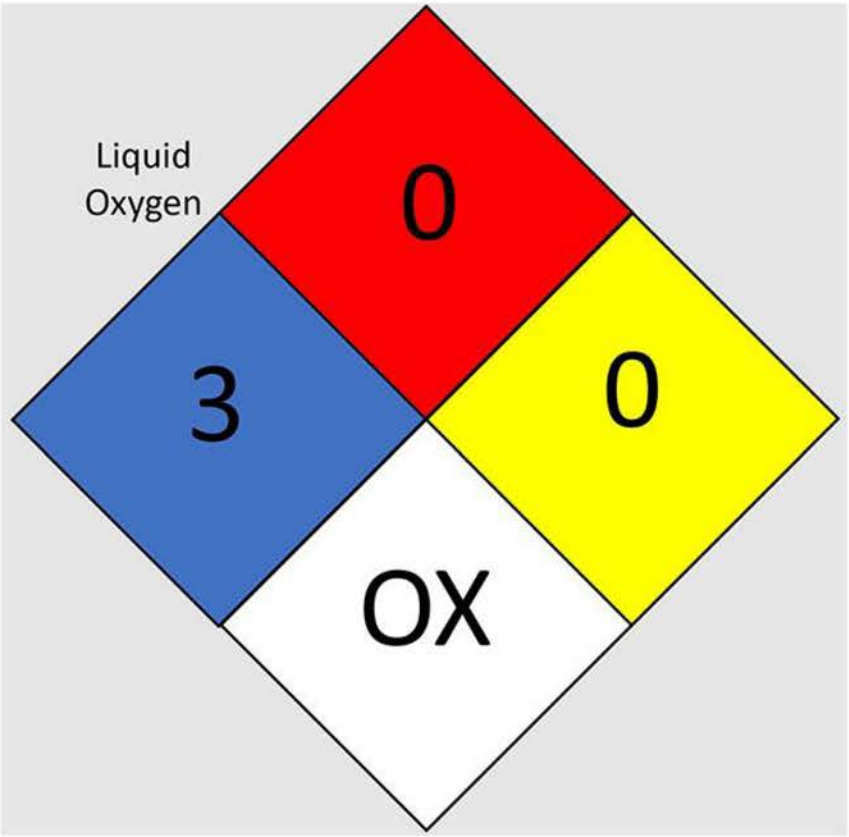
The NFPA 704 hazard identification system is characterized by a diamond which is more precisely defined as a "square-on-point" shape. It identifies the degree of severity of the health, flammability, and instability hazards. Hazard severity is indicated by a numerical rating that ranges from zero (0) indicating a minimal hazard, to four (4) indicating a severe hazard. The hazards are arranged spatially such that health hazards are indicated in the nine o'clock position, flammability at the twelve o'clock position, and instability at the three o'clock position. The six o'clock position on the symbol represents special hazards and has a white background; it is not always filled.

~~W~~	Water reactivity (avoid the use of water)
OX	Oxidizer
SA	Simple asphyxiant (nitrogen, helium, neon, krypton, or xenon)



As an example, the following would be used for propane gas which has a moderate health hazard, a severe flammability hazard, is normally stable, and does not require any special labeling. Another example is for liquid oxygen which can present a serious health hazard under emergency conditions, is not flammable, is stable, and is an oxidizer.\





Where do signs need to be located?

The placard is meant to provide quick hazard information for emergency responders. It should be visible in case of an emergency where the responders are likely to enter. If there are numerous areas where the responders could enter the facility, there should be numerous placards. The placement and quantity should be decided using a facility's best judgment coupled with the advice from your AHJ. At a minimum the placard should be posted on the two exterior walls of a facility or building, each access to a room or area, or each principal means of access to an exterior storage area.

Other considerations

As mentioned at the start of this discussion there are many additional considerations regarding hazardous materials. Even within this topic of identification there is a lot more to it than what has been simplified in this blog. There are construction, maximum allowable quantities, fire protection system, and worker exposure requirements just to name a few. Additionally, each of these will vary based on the nature of the material(s) being stored or used. If you want more detail on identification or any of the other topics around hazardous materials, let us know in the comments.

Sign Up

Jonathan Hart

NFPA Technical Lead

5 Comments 1 ONLINE LOGIN

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Write your comment...

Top

(PPE) (SDS) ? 1 month ago

I have studied Chemical Exposure and Hasadus Material through courses with CDF Fire Captain D.Wiliams at Chaffey College California back in the 1990's. Thankyou for the NFPA 704 Placard update. and I am searching for tups in the appropriate use of pest control as in the use of Glycosulphate: For: Roundup, Rodeo Aquatic Herbicide, Erase, etc.

0 0 Reply

John 5 months ago

Are HMIS inventories required to be maintained for construction activities?

0 0 Reply

Javier 8 months ago

I have a question regarding special hazards. Only three symbols can be placed. Is it possible to place other symbols?

0 0 Reply

Jordi 6 months ago

aquests tres simbols son els bàsics de la norma, ara bé, a proposta d'alguna empresa productora de productes químics i amb el permís de la NFPA, es poden incloure altres simbols en el rombe de color blanc

0 0 Reply

Diaaeldin Mostafa 1 year ago *(Edited)*

great Blog along with the series of "VALERIE ZIAVRAS". All are very informative; I am looking forward for more. Thanks dd Jonathan

0 0 Reply

From:	Samuel Arevalo
To:	Andrew Loper
Cc:	Hermance, David; Wilton, Benjamin; Luis Carlos
Subject:	RE: [EXT]: RE: ISEC-West Solar Site Visit recap.
Date:	Wednesday, April 16, 2025 9:57:23 AM
Attachments:	image001.png image004.png image005.png image006.png

Caution: External email, think before you click!

Morning Andrew,
Thank for the reply and appreciate the time. We will be in contact for future site inspection.

I will pass this info to other Site Managers in the Imperial County area.

Samuel Arevalo
Samuel.Arevalo@novasourcepower.com 760.996.1963
Area Manager - Imperial Valley Region
147 Pulliam Rd. Calexico, CA 92231
NOVASOURCE™
POWER SERVICES

From: Andrew Loper <AndrewLoper@co.imperial.ca.us>
Sent: Tuesday, April 15, 2025 4:00 PM
To: Samuel Arevalo <samuel.arevalo@novasourcepower.com>
Cc: Hermance, David <DHermance@TENASKA.com>; Wilton, Benjamin <BWilton@TENASKA.com>; Luis Carlos <luis.carlos@novasourcepower.com>
Subject: [EXT]: RE: ISEC-West Solar Site Visit recap.

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Good Afternoon
Sorry for the late reply back, I have provide ICFD answers to the questions.

- The signage at the site entrance regarding NFPA diamond. No NFPA at the site entrance, instead we have NFPA diamonds located at specific locations where needed. Yes this is acceptable per the fire Code:

5003.5 Hazard Identification Signs

Unless otherwise exempted by the fire code official, visible hazard identification signs as specified in NFPA 704 for the specific material contained shall be placed on stationary containers and above-ground tanks and at entrances to locations where hazardous materials are stored, dispensed, used or handled in quantities requiring a permit and at specific entrances and locations designated by the fire code official.

- Site water tanks signage and upkeep. Water tank is labeled Fire Department and confined space. The facility is responsible to ensure take is filled and labeled fire department use.
- Fire department Vegetation plan (any documents). The fire code requires vegetation clearance from solar panels:

1205.5.1 Vegetation Control

A clear, brush-free area of 10 feet (3048 mm) shall be required around the perimeter of the ground-mounted photovoltaic arrays. A noncombustible base of gravel or a maintained vegetative surface or a noncombustible base, approved by the fire code official, shall be installed and maintained under the photovoltaic arrays and associated electrical equipment installations.

- Response time and distance from local Fire Dept. Responding fire station is located at 1862 W. Evan Hewes Highway in the community of Seeley CA 92273. Typical response route will be from Drew Road to I-8 to Dunaway Rd.
- Need updated address and phone number to Seely Fire department to update Emergency contact info. Imperial County Fire Department Station 3 is located at 1862 W. Evan Hewes Highway, Seeley CA 92273. Phone Number 442-265-7571
- Pending scheduled date for Fire Dep. Site inspection. What is included in the inspection. We can work on scheduling some dates and time in the coming weeks. Items covered in the email such as vegetation management, signage, emergency numbers, hazardous inventory, fire extinguisher service, access (KNOX locks), and general fire and life safety items.
- ICFD would like to ensure all entrance gates have proper signage with emergency contact numbers, gate numbers, or site identification, KNOX locks
- ICFD would like to have a list of emergency contact numbers and persons names

ICFD would like to add that to be in contact with other solar sites that are being managed by Novasource to ensure compliance will all the items noted in this conversation.

If you have any questions please feel free to contact us. Thank you

From: Samuel Arevalo <samuel.arevalo@novasourcepower.com>
Sent: Tuesday, April 15, 2025 12:06 PM
To: Andrew Loper <AndrewLoper@co.imperial.ca.us>
Cc: Hermance, David <DHermance@TENASKA.com>; Wilton, Benjamin <BWilton@TENASKA.com>; Luis Carlos <luis.carlos@novasourcepower.com>
Subject: RE: ISEC-West Solar Site Visit recap.

Hi Andrew.
Following up on past email. Can you please provide details for questing below.

- The signage at the site entrance regarding NFPA diamond. No NFPA at the site entrance, instead we have NFPA diamonds located at specific locations where needed.
- Site water tanks signage and upkeep. Water tank is labeled Fire Department and confined space.
- Fire department Vegetation plan (any documents).
- Response time and distance from local Fire Dept.
- Need updated address and phone number to Seely Fire department to update Emergency contact info.
- Pending scheduled date for Fire Dep. Site inspection. What is included in the inspection.

From: Samuel Arevalo
Sent: Wednesday, April 2, 2025 11:55 AM
To: Andrew Loper <AndrewLoper@co.imperial.ca.us>
Cc: Hermance, David <DHermance@TENASKA.com>; Wilton, Benjamin <BWilton@TENASKA.com>; Luis Carlos <Luis.Carlos@novasourcepower.com>
Subject: ISEC-West Solar Site Visit recap.

Hi Andrew. Thanks for taking the time and visiting ISEC-West yesterday.

We discussed a few topics and wanted to follow up on a few things. Let us know if any changes are needed.

- The signage at the site entrance regarding NFPA diamond. No NFPA at the site entrance, instead we have NFPA diamonds located at specific locations where needed.
- Site water tanks signage and upkeep. Water tank is labeled Fire Department and confined space.
- Fire department Vegetation plan (any documents).
- Response time and distance from local Fire Dept.
- Need updated address and phone number to Seely Fire department to update Emergency contact info.
- Pending scheduled date for Fire Dep. Site inspection. What is included in the inspection.

We will be ordering signs for all site gate entrances with site name, 24/7 contact number, site block, and main site address. As you requested.

Please reply to all items and provide us with your feedback. Thanks again!

Samuel Arevalo

Samuel.Arevalo@novasourcepower.com 760.996.1963
Area Manager - Imperial Valley Region
147 Pulliam Rd. Calexico, CA 92231
NOVASOURCE™
POWER SERVICES


DANGER
HIGH
VOLTAGE


DANGER
HIGH
VOLTAGE


DANGER
HIGH
VOLTAGE


DANGER
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