



16.0 EMERGENCY RESPONSE & MANAGEMENT PLAN (RULE 8)

The following emergency response plan conforms to the requirements of Rule 8 – CDRMS regulations and Local emergency response agencies. Union Milling Company Contractors(UMC) will notify CDRMS (Section 8.1, CDRMS Code) ~~within 24 hours of~~ immediately of knowledge of a failure or imminent failure of the impoundment, embankment, stockpile or slope (Rule 8.1(a), CDRMS Code) or release of designated chemicals or process fluids (Rule 8.1(b), outside of secondary containment CDRMS Code).

~~Notification will be conducted in accordance with Rule 8.2 where~~ CDRMS will be ~~contacted~~ notified of the emergency between the hours of 8:00am to 5:00pm (Monday –Friday) 303-866-3567 ~~otherwise the Colorado Department of Local Affairs – and Lake County Office~~ of Emergency Management Department 719-486-1249 (24hr/day, 7day/wk).

16.1 INFORMATION CONTACTS & VERIFICATION OF PLAN

For further information about the Emergency Response and Management Plan, evacuation, response to emergency events, or other information regarding area/facility emergencies contact the following people:

TABLE 16-1: CONTACT INFORMATION

Name	Title	Telephone
Steve Craig	General Manager	303-877-9701
Nicholas Michael	Member	303.947.3499

The Emergency Response and Management Plan must be reviewed annually with all employees ~~at least annually~~.

Name of Facility: Leadville Mill

Date of Plan Development: ~~March, 2013~~ June 14, 2003

Date of Last Review for Plan Accuracy: ~~March, 2013~~ May 28, 2020



Date of Last Revision: ~~March, 2013~~ May 28, 2020

~~Facility Mill~~ General Manager: Steve Craig

16.1.1 IMMEDIATE ALTERNATIVE CONTACT

~~Colorado Department of Local Affairs Office of Emergency Management as coordinated through CDRMS 303.866.3567 or Lake County Office of Emergency Management Department 719-486-1249 (24hr/day, 7day/wk) or lcem@lakecountym.org).~~

- Office Of Emergency Management 303-692-2954
- Lake County Office of Emergency Management Department 719-486-1249 (24hr/day, 7day/wk.) or lcem@lakecountym.org).

16.2 GENERAL DESCRIPTION

~~Emergency notification information will include the following:~~

- ~~Notification that this is an emergency condition;~~
- ~~Nature of the condition including any chemicals and toxic or acid producing materials;~~
- ~~An estimate of quantities of chemical, toxic or acid producing materials has or could be released;~~
- ~~Time and duration of the occurrence and if on-going, or urgency of the pending situation;~~
- ~~Any known impact to human health, property or the environment;~~
- ~~The Operator's name and contact number for persons to be contacted for further information and response by the Office~~

1. Facility Personnel Responsibilities:

Emergency management responsibility rests with mill operator or his designated represented employee on site

Responsibilities include managing the following emergency activities:



- a. In the event of a structural failure, chemical spill, or accident the following will be conducted.
 - a. Notify the federal, state and Lake County emergency response agencies of the accident details (Section 8.2.2(a):
 - b. Location of occurrence.
 - c. Nature of Emergency Condition (Section 8.2.2(b)).
 - d. Quantity of Chemicals involved (Section 8.2.2(c) [Chemicals of Concern – supported by MSDS- mill office files].
 - e. Time (Section 8.2.2(d)).
 - f. Description of Potential impacts to human health and the environment (Section 8.2.2(e)).
 - g. Precautions and corrective actions taken (Section 8.2.2(e)); and
 - h. Telephone number and name of person for additional information (Section 8.2.2(g)).
 - i. Prepare and file a formal report addressing the following:
 - j. Date.
 - k. Spill/accident details.
 - i. Corrective action to mitigate current and future similar spills or accidents,
 - ii. Known or anticipated adverse human health or environmental impacts



16.3 EMERGENCY CONTACT INDEX

TABLE 16-2: EMERGENCY CONTACT INDEX

Emergency Contact	Telephone
Emergency – Ambulance, Fire, Sheriff	911
Fire Protection District	719.486.2990
Sheriff's Office	719.486.1249
Regional Hospital, St. Vincent's	719.486.0230
MSHA, Mill ID 0504992	808.746.1553
Lake County (LCEM)	719.486.1249
CDRMS, Denver Office	303.866.3567
Colorado Office of Emergency Preparedness and Response	877.518.5608
Mill Manager, Steve Craig	303.877.9701
Member, Nick Michael	303.947.3499

Agency	Name	Address	Telephone
CDRMS	Environmental Specialist	1313 Sherman Street, Denver, CO 80203	303.866.3567
District MSHA Office	District Mgr.	Federal Center 6 th & Kipling 2 nd Street, Building 25 #18 Denver, CO	303.231.5465
Lake County Emergency Response	Director	505 Harrison Ave Leadville, CO 80461	719.486.1249
Office of Emergency Preparedness and Response	Dispatcher	505 Harrison Ave Leadville, CO 80461	877.518.5608
Sheriff's Office	Dispatcher	505 Harrison Ave Leadville, CO 80461	719-486-1249
Medical Personnel and Other Emergency Vehicles	To be determined as necessary		
Hospital	St Vincent's	822 W 4 th Street Leadville, CO 80461	719-486-0230
Ambulance	Dispatcher	822 W 4 th Street Leadville, CO 80461	719-746-7144
Fire Station	Dispatcher	816 Harrison Ave Leadville, CO 80461	719-486-2990

16.4 EMERGENCY MANAGEMENT PROCEDURES

1. Facility Personnel Responsibilities:



~~a. Emergency management responsibility falls on the highest-ranking employee on site as follows:~~

- ~~-Nick Michael Union Milling Company, LLC Member~~
- ~~-Site Manager Steve Craig or Designated Representative~~

~~b. Responsibilities during an emergency: The highest ranking employee on site is responsible for managing the emergency response and will coordinate these activities:~~

- ~~i. Assess Emergency Level;~~
- ~~ii. Provide emergency response team, MSDS sheets and a listing of on site chemical placards and signs;~~
- ~~iii. Account for locations of all personnel who were in the area/facility at the beginning of the emergency;~~
- ~~iv. Implement emergency response;~~
- ~~v. Notify the appropriate emergency personnel as found in Emergency Contact List;~~
- ~~vi. Provide on site supervision of response activities;~~
- ~~vii. Assess and deploy needed resources and coordinating activities including placing traffic cones to direct traffic;~~
- ~~viii. Coordinate response with local emergency responders (fire, sheriff);~~
- ~~ix. Complete all reports associated with emergency;~~
- ~~x. Ensure investigation is conducted to determine the events resulting in the emergency, and to develop corrective actions to prevent recurrence;~~

~~2. Emergency Assessment Criteria:~~

~~Level 1: Injured employee (Minor).~~

~~Requires first aid treatment only; no Mill evacuation necessary.~~

~~Level 2: Injured employee(s) (Serious)~~



~~Requires emergency transport to local hospital; no Mill evacuation necessary.~~

~~Level 3: Mill evacuation, no injuries~~

~~No injuries; ventilation disabled or fire threatening safety occurring so as to require mill evacuation.~~

~~Level 4: Mill evacuation, injured employee(s)~~

~~Requires emergency transport to local hospital; Mill evacuation necessary.~~

~~Level 5: Rescue~~

~~Life-threatening situation requiring rescue teams.~~

~~3. Emergency Response Communication Procedures:~~

~~Level 1~~

~~Mill phones will be used to alert personnel of the situation, the necessary first aid treatment required, and the assistance and resources needed to transport injured person. Personnel will contact 911 if necessary.~~

~~Level 2~~

~~Mill phones will be used to alert surface personnel similar to Level 1. Surface persons receiving alert will call 911 and notify dispatch that emergency transport is required. A designated employee will be dispatched to dispense traffic cones at appropriate site entrance to alert emergency response team of fastest route.~~

~~Level 3~~

~~Mill phones will be used to notify all personnel that the Mill is to be evacuated. The highest ranking person shall be notified and shall determine the need to contact outside assistance.~~

~~Level 4~~

~~Procedure shall be followed as similar to Levels 2 & 3.~~

~~Level 5~~

~~Procedure shall be followed as similar to Levels 2 & 3, and all appropriate agencies shall be notified as listed on the Emergency Contact Index.~~

~~4. Emergency Response and Access:~~



~~Based on the Emergency Response Level determination, transportation of injured personnel may be conducted by any of the following means:~~

- ~~a. Ground transportation to County road to meet emergency response vehicles.~~

~~5. Emergency Response to Fire/Chemicals:~~

1. Emergency Assessment Criteria:

Level 1: Injured employee (Minor),

Requires first aid treatment only; no mill evacuation necessary,

Level 2: Injured employee(s) (Serious)

Requires emergency transport to local hospital, no Mill evacuation necessary.

Level 3: Mill evacuation, no injuries

No injuries: ventilation disabled no fire threatening safety occurring to require mill evacuation.

Level 4: Mill evacuation, injured employee(s)

Requires emergency transport to local hospital, mill evacuation necessary.

Level 5: Rescue

Life-threatening situation requiring rescue teams.

2. Emergency Response Communication Procedures:

Level 1

Mill phones will be used to alert personnel of the situation, the necessary first aid treatment required, and the assistance and resources needed to transport injured person. Personnel will contact 911, if necessary.

Level 2

Mill phones will be used to alert surface personnel similar to Level 1. Surface persons receiving alert will call 911 and notify dispatch that emergency transport is required. A designated employee will be dispatched to dispense traffic cones at appropriate site entrance and to alert emergency response team of fastest route.

Level 3



Mill phones will be used to notify all personnel that the mill is to be evacuated. The highest-ranking person will be notified and will determine the need to contact outside assistance.

Level 4

Procedure will be followed as like Levels 2 & 3.

Level 5

Procedure ~~shall~~ **will** be followed ~~as similar to like~~ Levels 2 & 3, ~~and all appropriate agencies shall be notified as listed on the Emergency Contact Index and~~ **notify Emergency Contact Index agencies.**

3. Emergency Response and Access:

Based on the Emergency Response Level determination, transportation of injured personnel may be conducted by any of the following means:

- a. Ground transportation to County road to meet emergency response vehicles.

4. Emergency Response to Fire/Chemicals:

In the event of a fire, dry chemical fire extinguishers will be used as the first measure of containment, and the local fire department will be notified immediately. Should the need arise for emergency vehicles onsite; a ground guide will be dispatched to meet said vehicles at the Mill office. Access to the site ~~will be as~~ **is** shown on the Emergency Plan. A considered emergency spill or release ~~in excess of~~ **more than** reportable quantities as defined by 40 CFR 261.2. In the event of a forest fire, evacuations will occur using the safest route.

~~In the event of a chemical spill or accident the following will be conducted. Section references below refer to Rule 8 of the CDRMS Code.~~

- ~~▪ Notify the federal, state and Lake County emergency response agency of the accident (Section 8.2.2(a)) including details related to:~~

~~○ Location;~~

~~○ Nature of Emergency Condition (Section 8.2.2(b));~~

~~○ Quantity of Chemicals involved (Section 8.2.2(c) [Chemicals of Concern supported by MSDS which are on file at Mill Office];~~

~~○ Time (Section 8.2.2(d));~~



- ~~○ Description of Potential impacts to human health and the environment (Section 8.2.2(e));~~
- ~~○ Precautions and corrective actions taken by UMC (Section 8.2.2(e)); and~~
- ~~○ Telephone number and name of person for additional information (Section 8.2.2(g)).~~

~~▪ Prepare a formal report which supplies the following:~~

- ~~○ Date~~
- ~~○ Spill/accident details;~~
- ~~○ Corrective action to mitigate current and future similar spills or accidents (Section 8.2.3(a));~~
- ~~○ Known or anticipated adverse human health or environmental impacts (Section 8.2.3(b));~~
- ~~○ Name, address and telephone number of the responder(s)/operators contact person (Section 8.2.3(c));~~
- ~~○ Activities taken to monitor or mitigate the conditions (Section 8.2.3(d)); and~~
- ~~○ Corrective action to mitigate current and future similar spills or accidents (Section 8.2.3(e)).~~

~~Since UMC manages designated chemicals the following information is provided to comply with Section 8.3, CDRMS Code.~~

- ~~○ Designated personnel who will be on site and in charge in case of an emergency; (Section 8.3.2(a), CDRMS Code);~~
- ~~○ A list of designated chemicals and maximum quantities to be stored or used on site at any one time (Section 8.3.2(c), CDRMS Code);~~
- ~~○ A map showing the location of materials available to contain, control or clean up excursions or releases of designated chemicals.~~



16.5 ON-SITE EMERGENCY RESPONSE EQUIPMENT

On-site emergency response (Section 8.3.2(d), ~~CDRMS Code~~) equipment and their locations are listed in Table 16-3.

TABLE 16-3: ON-SITE EMERGENCY RESPONSE EQUIPMENT

Equipment	Location
Mill Safety	
First Aid Kit	Mill Building
Stretcher	Mill Building
Fire Extinguisher	
Hand Held	Mill Building & Crusher Building
Other	
Water Storage	Mill Building
Absorbent	Mill Building
Communication	Cell Phone
Telephone	VoIP & Cell Phone

16.6 MILL EMERGENCY NOTIFICATION PLAN

~~The purpose of this plan (Section 8.3.2(b), CDRMS Code) is to comply with 30 CFR Part 49.9, and provide for notification procedures for MSHA, CDRMS Rule 8 and Lake County Emergency Response criteria. The mill manager is the rescue responder for the Mill. The Mill manager will provide maps, plans, and other necessary information to the first responder in the event of an emergency.~~

The emergency notification plan, under the direction of the mill manager, or his designated representative, provides first responders maps, plans, and other requested information.

16.6.1 COMMAND CENTER

A Command Center will be established at the ~~base of operation~~ mill building, which is where the ~~people in charge gather to~~ response personal will plan and direct the rescue and recovery operation-site activities. The Command Center will contain communication equipment, connected to field personnel. In addition, it will contain maps for following the progress of the teams and for making findings and figuring out strategies.



The Command Center is where all the decisions are made, providing an adequate information center from which all public information is released and obtaining and distributing necessary supplies and equipment.

16.6.2 UMC EMERGENCY INFORMATION CONTACTS

The following individuals will serve as Emergency Information Contacts and will coordinate, receive, and distribute information to ~~staff~~ **responsible personnel**:

TABLE 16-4: EMERGENCY INFORMATION CONTACTS

Title	Name	Address	Telephone Personal	Telephone Office
General Manager	Steve Craig	P.O. Box 620490 Littleton, CO 80162-0490	303.877.9701	303.877.9701
Mine Manager	Gary Slifka	PO Box 586 Leadville CO 80461	719-293-3417	719-293-3417
Member	Nick Michael	6200 S. Vivian Street Littleton, CO 80127	303.947.3499	303.947.3499

~~16.6.3 NOTIFICATION PROCEDURE~~

~~The most senior UMC Information Contact listed above is responsible for notifying the following:~~



Agency	Name	Address	Telephone
CDRMS	TBD	1313 Sherman Street, Denver, CO 80203	303.866.3567
District MSHA Office	District Mgr	Federal Center 6 th & Kipling 2 nd Street, Building 25 #18 Denver, CO	303.231.5465
Lake County Emergency Response	Director	505 Harrison Ave Leadville, CO 80461	719.486.1249
Office of Emergency Preparedness and Response	Dispatcher	505 Harrison Ave Leadville, CO 80461	877.518.5608
Sherriff's Office	Dispatcher	505 Harrison Ave Leadville, CO 80461	719-486-1249
Medical Personnel and Other Emergency Vehicles	To be determined as necessary		
Hospital	St Vincent's	822 W 4 th Street Leadville, CO 80461	719-486-0230
Ambulance	Dispatcher	822 W 4 th Street Leadville, CO 80461	719-746-7144
Fire Station	Dispatcher	816 Harrison Ave Leadville, CO 80461	719-486-2990

16.7 FIRE PREVENTION & PROTECTION PLAN

16.7.1 PURPOSE

~~The purpose of this plan is to provide Company employees with a minimum standard for fire protection and prevention at the Mill. This plan complies with the MSHA Title 30 CFR 57.~~

The following provides mill employees a fire prevention and protection plan that is compliant with MSHA Title 30 CFR 57.

16.7.2 SCOPE

~~This program applies to the Mill. The UMC Mill Manager (or in his absence the Mill Foreman) is the program coordinator. His or her duties include:~~

- ~~• Supervising the program;~~
- ~~• Scheduling training for Company personnel (First Responder Training);~~



- ~~Install chemical signage/placards;~~
- ~~Purchasing and distributing portable fire extinguishers;~~
- ~~Assigning maintenance, inspection and testing duties; and~~
- ~~Verifying that portable fire extinguishers inspection and maintenance and employee training are properly documented.~~

The Leadville Mill superintendent or his designated representative duties include:

- Implementing and supervising the program.
- Scheduling first responder training.
- Installing and maintaining chemical signage/placards.
- Installing and maintaining fire extinguishers.
- Maintain inspection and maintenance records, and
- Documenting portable fire extinguishers are inspected and maintained.

16.7.3 TRAINING

~~UMC personnel will receive annual training regarding fire/chemical hazards of the materials and processes to which they are exposed as well as the care and use of portable fire extinguishers, fire extinguisher location; emergency action plan implementation and first responder's roles and responsibilities.~~

Leadville Mill personnel will receive annual fire/chemical hazards and hazard safety training. Training will discuss employee roles responsibilities, and emergency response tasks.

16.7.4 INSPECTION & MAINTENANCE

~~An approved contractor will inspect all portable fire extinguishers annually. This will consist of thoroughly examining each extinguisher's shell, gauge, hose and nozzle, and weighing and retagging each fire extinguisher.~~

~~The Site Mill Manager (or in his absence the Mill Foreman) shall be designated as the Operations Specialist. The Operations Specialist will visually inspect each fire extinguisher for readiness and proper location monthly. This inspection will be documented on each fire extinguisher inspection log.~~



~~An approved contractor shall conduct hydrostatic testing and scheduled maintenance (when required) for:~~

- ~~• Dry chemical fire extinguishers; and~~
- ~~• CO₂ extinguishers.~~

~~All service, maintenance or hydrostatic testing information shall also be documented.~~

Fire extinguishers will be inspected by a third-party contractor annually

The mill manager (or his designated representative) will visually locate and inspect extinguisher readiness, on a monthly schedule, readiness Inspections will be recorded and kept in the Mill's office.

16.7.5 FIRE PREVENTION

~~The Operations Specialist will be responsible for monitoring the accumulation of flammable and combustible waste materials and residues that contribute to fires.~~

The mill superintendent (or his designated representative) will be responsible for monitoring the accumulation of flammable and combustible waste materials and residues that may contribute to fires.

- Flammable substances are those liquids, solids or gases that have flashpoints below 100°F. Some of the more common flammables are gasoline, natural gas, propane, methanol and certain paints, primers and thinners.
- Combustible substances are those liquids, solids or gases that have flashpoints greater than 100°F. Some of the more common combustibles include grasses, paper, wood, paint, certain lubricating oils and greases.

Good housekeeping and equipment maintenance are essential to keep fire hazards at a minimum. Listed below are housekeeping and maintenance requirements for controlling the supply and accumulation of flammables and combustible substances.

- Flammable liquids ~~shall~~ will be stored in original or approved containers;
- Larger quantities (25 gallons or more) of flammable liquids or gases ~~shall~~ will be stored in an approved container outside of the building or inside the building in an approved fire rated storage cabinet;



- Each flammable liquid container ~~shall~~ **will** have a bonding and grounding cable attached between it and the receiving container while liquids are being transferred or dispensed;
- Oil-soaked rags ~~shall~~ **will** be stored in UL approved covered metal containers;
- Scrap paper and wrapping or packing materials ~~shall~~ **will** be removed from the work area immediately after unpacking. Waste receptacles will be emptied daily and contents placed in the trash containers provided;
- Weeds and grasses will not be allowed to grow or accumulate around the outside of flammable storage facilities;
- Signage ~~shall confirm to minimize~~ **will be compliant with** size standards; and
- Fire prevention signs will be posted in conspicuous locations and kept in good condition as follows:

EXIT – Posted above all exit doorways

DANGER – NO SMOKING, MATCHES OR OPEN FLAMES – Posted at entry point to fuel tanks and chemical storage containers.

DANGER – FLAMMABLE – Posted on doors of flammable storage cabinets

NO SMOKING – Posted on Mill entrance and within ~~25ft of fuel storage areas~~ **the building**

FIRE EXTINGUISHER – Signs posted or distinguished markings above each fire extinguisher

- Fire extinguishers will be placed at appropriate distances through the facility;
- Insulate or protect hot surfaces that might ~~be sources of ignition against fuel spillage or leakage~~ **fuel or chemical ignition sources**;
- Using gasoline or condensate for cleaning agents is strictly prohibited; and
- Operations Specialists are responsible for visually inspecting heat-producing equipment and ensuring that good housekeeping and equipment maintenance are being performed to keep fire hazards to a minimum.

16.7.6 CHEMICALS OF CONCERN

- Material Safety Data Sheets (MSDS) Chemical data sheets, locations and quantities (See Appendix 14-2) and



- Placement of signs and placards.

16.8 ANNUAL TRAINING PROCEDURES

- Mill Safety Training/Refresher Course by MSHA-Certified Instructor(s);
- First Aid/CPR Certification by MSHA-Certified Instructor(s);
- Fire Extinguisher Training/Refresher, and
- First Responder Certification

*By nature, each emergency is different. No single set of procedures can apply uniformly to all emergencies. This set of procedures is intended to initiate emergency response appropriate to a broad category of emergencies. Each person onsite is expected to rely on training and experience to handle an emergency situation appropriately.