CRISIS MANAGEMENT PLAN
Crisis Management Plan

Introduction .............................................................................................................................................................. 2
Purpose .................................................................................................................................................................... 2
General ................................................................................................................................................................... 2
Crisis Defined .......................................................................................................................................................... 2
Response Priorities .................................................................................................................................................. 2

Overview of the Plan .................................................................................................................................................. 2
Respond .................................................................................................................................................................... 2
Resolve .................................................................................................................................................................... 3
Recover .................................................................................................................................................................... 3

Crisis Management Plan ............................................................................................................................................. 3
Step 1: Secure Site, Call 911, Render First Aid ......................................................................................................... 3
Step 2: Notifications and Assignments .................................................................................................................... 4
Step 3: Initial Investigation ......................................................................................................................................... 4
Guidelines for Communicating with the Media ........................................................................................................... 5
Internal Communications During and After a Crisis .................................................................................................. 6
Personal Use of Social Media During and After a Crisis ............................................................................................. 6
Responding to a Search Warrant ................................................................................................................................ 7

Resources ................................................................................................................................................................... 10
Notification List, Crisis Team Roster, and Project-Specific Personnel ........................................................................... 11
Sample Holding Statement ............................................................................................................................................. 14
Media Log .................................................................................................................................................................. 15
Additional Guidance for CMT Members .................................................................................................................... 16
Crisis Management Plan (Continued) ....................................................................................................................... 16
Step 4: Media Contact, Developing Messages, and Orchestrating a Response ......................................................... 16
Step 5: Messaging Approval and Delivery ................................................................................................................ 17
Step 6: Monitor and Provide Feedback ................................................................................................................... 17
Using the Web ............................................................................................................................................................ 18
Corporate Social Media Response ................................................................................................................................ 18
Working with Family Members ................................................................................................................................... 19
Hazardous Substance Releases ...................................................................................................................................... 20
Oil Spills ..................................................................................................................................................................... 22
Mental Health Resources ............................................................................................................................................... 24
Bomb Threat Checklist ............................................................................................................................................... 25
Crisis Management Notification Protocol Flowchart (General) .................................................................................. 26
Project-Specific Guidance Addendum ...................................................................................................................... 27

Quick Reference Appendices
Fire or Explosion ............................................................................................................................................................ A
Personal Injury ............................................................................................................................................................... B
Severe Weather ........................................................................................................................................................... C
Active Shooter ............................................................................................................................................................ D
Labor Disputes ............................................................................................................................................................ E
Pollution Release ........................................................................................................................................................... F
Search Warrants .......................................................................................................................................................... G
Property Damage ........................................................................................................................................................ H
Mental Trauma ............................................................................................................................................................ I
Bomb Threat ............................................................................................................................................................... J
Introduction

I. PURPOSE
To provide a structured response protocol for use in the event of a crisis to ensure the needs of those affected by the crisis are timely met and business operations are promptly stabilized.

II. GENERAL
Traylor’s Crisis Management Plan (CMP) describes the process and procedures marking an effective crisis response, including the creation of a Crisis Management Team (CMT) composed of primarily corporate personnel along with a ranking member from each of the major offices, yards, and jobsites. While the CMT serves as the CMP’s governing body, all employees are expected to familiarize themselves with the CMP and adhere to it during a crisis. Adherence to this plan is critical in maintaining Traylor’s reputation and demonstrating our ability to quickly address emergencies in a professional, organized, and sincere manner. By reviewing this CMP ahead of time, Traylor personnel will be better situated to respond appropriately to the high-pressure and rapidly evolving circumstances during a crisis.

III. CRISIS DEFINED
A crisis is a sudden event or set of circumstances that significantly disrupts normal business operations and which materially harms or threatens to harm the health and safety of people, the environment, property, or Traylor’s reputation.

IV. PRIORITIES WHEN RESPONDING TO CRISES
1. Saving lives and preventing serious injuries
2. Minimizing property and environmental damage, protecting assets
3. Safeguarding the Company’s reputation and image
4. Returning to normal business operations, and addressing any lasting fallout

Overview of the Plan

In general, there are three phases to a successful crisis management strategy: a response phase, a resolution phase, and a recovery phase. Each of these phases is inherently complex, fluid, and often require managing a number of tasks simultaneously. This difficulty can further be amplified when the crisis is occurring in the field, far away from the corporate or regional offices.

I. Respond
   a. During the response phase, the main tasks are protecting the health and safety of those in and around the impacted area, notifying appropriate parties, and gathering information.
   b. The information gathering process should be thorough and performed with an eye toward which factual information is appropriate for release to the public via a statement or press release.
   c. If a media presence materializes, direct them to a predetermined and safe location away from the impacted area to await a statement from the designated spokesperson.
   d. The CMT will deliver a measured statement to the media shortly after event, identifying only currently known facts surrounding the situation. Such statement should omit private details, including the names of victims, other contractors, etc. At this point, the investigation will be in its infancy stages so such
statement by the CMT should be as general as possible so as to not misrepresent the surrounding circumstances.

II. Resolve
   a. As the investigation unfolds, the CMT may modify the approach to account for new information.
   b. A primary function of the CMT is to ensure the victims and others affected are offered the services necessary to recover from their experiences and to keep abreast of the status of those individuals affected.
   c. The CMT will periodically update the media of any material developments in the investigation or steps that are underway to address this event and prevent similar events from happening in the future. Provide answers to any previously deferred media questions in light of new information.

III. Recover
   a. Upon completion of the investigation, the CMT will implement the necessary changes to prevent a similar event from happening in the future. The CMT should make these steps known to the media and stress the Company’s ongoing commitment to safety at every opportunity.
   b. The CMT will continue to follow-up with victims and those affected to ensure their personal recoveries are progressing.
   c. The Company should visibly participate in industry initiatives designed to improve in the area responsible for the crisis, thus demonstrating a commitment to improving.
   d. The Company, led by the CMT, will hold an internal debriefing session to assess the effectiveness of the CMP and the performance of those operating under it. Such debriefing sessions will help to identify areas for improvement.

Crisis Management Plan

Step 1: Secure the Site, Call 911, and Render First Aid

When a crisis occurs, the first step is to promptly secure the area and prevent any further loss or injury. This includes shutting down all equipment/machinery and stopping all operations in the immediate area. If the unsafe condition that caused the event remains ongoing, the job must either be stopped or personnel must be pulled from the area until the condition is remedied. Based on the seriousness and circumstances of the event, the project manager will determine whether to suspend work for the day or reassign workers to other portions of the site unaffected by the event.

All tools, equipment, materials or other evidence that may be useful as evidence or assist in the investigative efforts should not be moved or destroyed until authorized by Project Management at the direction of the CMT.

Emergency Notification Procedure

1. Call 911.
2. Be prepared to provide the following information:
   a. Name of person reporting the emergency;
   b. Nature and severity of the injury or illness;
   c. Locations and phone extensions from which the call is being made;
   d. Number of people involved; and
   e. Detailed directions to the scene if located on a job site off of public roadway
3. If necessary, assign an individual to stand near the entrance and direct emergency responders to the scene as they arrive.
4. Do not hang up until instructed to do so.
5. At all times, remain calm, speak clearly, and follow all the dispatcher’s instructions.

First Aid
Those designated, trained, and qualified to perform first aid may do so while emergency responders are in transit.
Accompany the Injured
A supervisor or safety representative should accompany the injured to the hospital if possible.

Notifying Emergency Contact(s)
Only those approved to communicate with the emergency contact or family members of an injured party should do so. When speaking with a family member or emergency contact, refrain from speculating on the prognosis of the injured party or commenting on his or her current condition. Convey only known and objective information surrounding the event. Avoid making assumptions or being too descriptive. Inform the emergency contact that his or her loved one is in the care of emergency professionals and on the way to the hospital. Important details to convey include the location of the medical facility to which the injured party is receiving treatment and offering to arrange for the emergency contact’s transportation to such medical facility.

Minor injuries
In the event of minor injuries, once it is safe to do so, an injured party’s supervisor or a designated co-worker should reach out to the injured party’s emergency contact and inform him or her of the situation.

Serious injuries or death
In the event of a serious injury or fatality, notification and subsequent interactions with the injured party’s emergency contact and family members should be handled by an individual appointed by the Crisis Management Team.

Step 2: Notification and Assignments
Even if a crisis situation does not presently seem to be at risk for garnering the media’s or public’s attention, the CMT should be informed as such situations can escalate quickly. Prompt notification allows the CMT and the Company to better control any potential fallout and influence the subsequent narrative surrounding the event.

Communication Notification Steps:

1. Point person reaches out to the proper authorities (e.g., paramedics, firefighters, agencies for which notification is mandated by law or contract, etc.) and if applicable, the client contact or Owner representative.
2. Point person immediately calls the first available member of the CMT, preferably the Crisis Manager and informs him or her of all known information surrounding the event. Point person continues to update Crisis Manager as new information surfaces through the investigatory efforts.
3. The Crisis Manager, or whichever member of the CMT the point person makes contact with, coordinates contacting all other members of the CMT.
4. A conference call is scheduled to assess the seriousness of the crisis and begin planning next steps.

Step 3: Initial Investigation
Once the scene is secured, emergency personnel arrives, and the CMT has been notified, the CMT will designate an individual or team of individuals with the task of determining as many facts as possible relating to the crisis event. The sort of questions such designated individuals will be tasked with answering include the following:

- WHAT happened and where?
- WHEN did this happen?
- WHO is involved?
- HOW did this happen?
- WHAT is currently being done?
When collecting data, such designated individuals should also consider the following:

- Do I have all the facts (to the best of your knowledge)?
- What other information do I need to put the event into perspective?
- Was my information source(s) credible?
- Is the information consistent from several sources?
- Who are likely witnesses and who are their employers (if subcontractors)?

The CMT may offer additional guidance or specific instructions regarding the procedure of the ongoing investigation. Following these instructions is critical in gaining a comprehensive understanding of the situation and allowing the Company to respond in the appropriate manner. While only persons designated by the CMT will undertake formal investigatory efforts, any employees with relevant information should reach out to the designated investigator with such information.

The Crisis Management Team will be responsible for executing the remaining steps of the Crisis Management Plan. Accordingly, the remaining steps of the plan as well as additional information for the CMT, its members, and its designated personnel is provided at Attachment 4. Additional guidance for all employees continues below.

Guidelines for Communicating with the Media

While all substantive inquiries should be deferred to the CMT or designated spokesperson, in the event any employee is confronted or cornered by the media, the following lists identify both actions that should be carried out and avoided in such an event:

**DOs**

- Respond with generic statements. For example, “We are currently investigating the nature of the situation and will provide updates with further information when known.”
- Unless you are a designated spokesperson, defer all substantive questions to the CMT and the Crisis Manager.
- Demonstrate the Company’s concern by all your statements and your actions, no matter how insignificant those statements or actions may seem. Optics are critical in coming across favorably in the eyes of the public.
- Be sincere and empathetic.
- Stress the Company’s commitment to whichever area pertains to the event (e.g., if a workplace injury, reiterate the Company’s emphasis on safety).
- Publicly thank employees and other members of the community (e.g., first responders) as appropriate.

**DO NOTs**

- Do not blame anyone for anything.
- Do not make conflicting or contradicting statements.
- Do not speculate about the event, potential causes, outcomes of the investigation, etc.
- Do not outright decline to answer questions.
  - Instead, defer substantive questions to the Crisis Manager or inform media personnel that more information will be forthcoming once known. Assure media personnel that they will be given the opportunity to ask questions at subsequent media briefings.
- Do not disclose any information that may violate another’s right to privacy.
- Do not pitch products or services during a crisis.
- Do not show favoritism.
  - Instead, be impartial with all media outlets and their representatives. Treat each one with equivalent respect and allow for a fair apportionment of questions.
- Do not come across as defensive.
Avoid statements that come across as self-protective (e.g., “This event was not our fault” or “We are not legally responsible.”

× Do not ignore the impact the crisis may be having on employees, their families, and the wider community.

**Internal Communications During and After a Crisis**

Messaging, both external and internal, is critically important during a crisis. While the CMT is responsible for all external communications during a crisis, all employees can help prevent the spread of misinformation or rumor through judicious internal communications practices. Internal communications may be delivered in a variety of formats, including via email, personal notes, calendar entries, voicemails, or other documents whether in electronic or hard copy formats.

Poor and careless communications, especially during a crisis or in its aftermath, can affect the Company’s ability to adequately respond to the circumstances. Moreover, such communications can expose the Company and individuals to civil or criminal liability and negatively impact the Company’s position in lawsuits and investigations. As a general rule, if there is any concern that a proposed communication may inhibit the Company’s response to a crisis, please refrain from transmitting it.

In order to best position the Company to contain and manage a crisis, employees must take into account the following considerations and key defensive writing techniques when crafting internal communications during a crisis:

- **Purpose**
  - Determine whether the correspondence is truly necessary.
  - Consider whether the message meaningfully advances the Company’s response to the crisis.
  - Assume your writing will appear on television and be preserved forever.

- **Relevance**
  - Only convey information relevant to the subject matter.
  - Respect confidentiality by not disclosing Company or personal confidential information.
  - Do not assign blame to an entity or an individual.

- **Accuracy**
  - Only convey known and Company-verified facts.
  - Identify and correct potential misinformation.
  - Avoid exaggeration and speculation, especially as such relates to the cause of the crisis.

- **Clarity**
  - Be precise, simple, and unambiguous in all communications.
  - Avoid words or expressions that could be misinterpreted.
  - Edit before you send.

- **Brevity**
  - Use concise language to express your point as efficiently as possible.
  - Copy the minimum number of people necessary.
  - Avoid humorous or sarcastic comments.

- **Context**
  - Be mindful of the context and tone of your message.
  - Do not discuss safety issues in financial terms.

Consider your audience, both the one intended and others that may potentially view it (e.g., the media, a judge, attorneys, investigators, etc.).

**Personal Use of Social Media During and After a Crisis**

Many of the same prior guidelines relating to internal communication during a crisis can similarly inform appropriate social media conduct during a crisis. However, Employees considering posting on personal social media accounts regarding a crisis should approach such decision with an even higher sense of awareness of potential impact such
communications may have on the Company. As a general principle, it is best if personal social media chatter regarding a crisis be limited so as not to inadvertently interfere with the Company’s response efforts. With the above in mind, below are some additional considerations employees should take into account before posting online regarding a crisis:

- Does the proposed social media post or message impede the Company’s ability to control the narrative surrounding the crisis and prevent the spread of rumors and misinformation?
- Could the post or message be wrongly attributed to the Company and thus distort the Company’s official response?
- Does the post or message contain personal information that exposes the Company or the employee to increased liability?
- Does the post or message have any potential to negatively impact the Company’s position in any lawsuit or claim that may arise from the crisis?
- Does the post or message contain any confidential information, including information not released to the public via the Company’s official channels?

When in doubt as to whether a post or message is appropriate, it is best to err on the side of caution and refrain from transmitting. During a crisis, the Company will be intensely focused on responding to those in need and keeping the public informed through its official channels, and those efforts can be greatly aided by its employees’ careful and judicious use of social media.

Additional information and guidelines on appropriate social media behavior can be found in the Company’s employee handbook.

**Responding to a Search Warrant**

Having a group of agents show up at the office without notice, waving a search warrant, and demanding access to company records can be a jarring experience. It is important to remain calm in such a situation despite the circumstances. Below are some helpful guidelines to effectively prepare for and respond to search warrants.

**Being Prepared**

- Clearly mark privileged documents and maintain them separately from non-privileged material.
- Maintain copies of essential business records (including records stored on personal computers) off premises.
- Ensure that at least one lawyer at each company facility has been trained regarding the proper response to a search warrant. Management at facilities where there is no lawyer should know whom to call in the event of a search.
- Identify outside counsel experienced in criminal law before the need arises and have counsel’s contact information readily available and distributed to key personnel.

**Day of the Search**

- **Do not attempt to prevent the search from taking place.**
  - Do not obstruct the agents executing the warrant. Such actions can result in criminal penalties and the agents are authorized to use force in response.

- **Identify and meet with the lead agent as soon as possible.**
  - Also, try to obtain the business cards or the names and affiliations of the agents conducting the search as well as the name and contact information of the prosecutor who executed the warrant. At this point, immediately contact the Legal Department in Evansville and it will assist with the remaining steps below. Meanwhile, however, it is a good idea to ask the lead agent for information pertaining to the status of the company (e.g., target or subject of the investigation, or neither) and the nature of the allegations being investigated. The lead agent may not be receptive to questions, but it is prudent to inquire whether any employees have been or are planning to be interviewed. If so, inform the lead agent that
counsel needs to be present during such interviews. Keep in mind that search warrants do not typically permit agents to conduct interviews on the company’s premises. As such, one does not have to consent to such interviews or to permit company property to be used for law enforcement purposes. Do not, at any point, engage in dialog or a debate with the agents regarding the factual basis of the investigation.

- **Advise employees of their rights.**
  - It is important, however, not to give advice to employees that could be construed as instructions not to cooperate with the agents conducting the search. Instead, inform employees of the following rights: (1) they may, but are not required to answer agents’ questions, and whether to do so is entirely up to them; (2) if they do choose to speak to agents they (a) must tell the truth as false statements can lead to criminal prosecution, and (b) can set conditions on their responses (e.g., require counsel to be present during any questioning). It is important for all employees to know that the company will not view any employee unfavorably if he or she decides to speak with agents.

- **Do not remove or destroy documents to prevent their seizure.**
  - Removing, hiding, altering, destroying, or deleting documents is strictly forbidden. Those found engaging in this behavior could face criminal prosecution.

- **Consider sending employees home.**
  - An unannounced search is likely to significantly disrupt one’s work. Employees should try their best to continue working as normal to the extent they are able to do so given the circumstances. In some instances, employees may be sent home if their continued operation during the search is not feasible.

- **Do not consent or otherwise give your permission to search any area or to seize any property.**
  - In the event agents believe a broader search is warranted or that an item not listed on the warrant is worthy of investigation, agents may ask for consent to a broader search than is contemplated in the original search warrant. Do not give consent for such a search. Be very clear that you are withholding such consent, at least until you have a chance to confer with counsel.

- **Do not volunteer substantive information.**
  - Remember, a search warrant does not require you or any other employee to provide direction or guidance to the agents. You are not expected to show them the location of any documents or other property or otherwise assist them in their search. There is a crucial difference between passively not assisting agents (which is permissible) in their search and actively obstructing their efforts (which is not permissible). That being said, good judgment suggests that some assistance may be appropriate when the answer is obvious and unnecessary disruption can be avoided.

- **Object to any review or seizure of privileged documents, including, legal communications.**
  - If agents seize legally privileged documents despite your objections, immediately notify the Legal Department or contact the responsible prosecutor to give notice of your objection and to determine whether the investigating agency has segregated one or more agents to act as a “clean team” (i.e., a team that is screened from the substantive investigation in order to handle any potentially privileged materials. If the seizure goes forward, propose that you gather the documents under the agents’ supervision and seal them so that they cannot be opened without breaking the seal. You can thus prevent government review of privileged documents until the privilege issue is resolved.

- **Make a record of events as they unfold.**
  - Keep detailed notes during the search, both in order to support a possible challenge to the legality of the search as well as to gather information concerning the scope and nature of the investigation.

- **Ask to be present when the agents make an inventory of the property to be seized.**
You are entitled to a receipt for the property before the agents leave. Typically, the agents will deliver a copy of such when they leave after completing their search.

- **Make your own inventory of the seized property, including photographs if possible.**
  - Creating your own inventory helps identify discrepancies between the agents’ inventory and yours. Agents’ inventories can often be underinclusive, sparse, and unhelpful.

- **Ask for copies of seized electronic media.**
  - Computer searches are generally executed either by making electronic copies of files on-site, creating mirror images of entire hard drives, or simply confiscating the computers entirely and reviewing the contents off-site. Generally, the search warrant itself will address the procedures the agents are required to follow. The agents may not be required to provide you with copies of seized computer files, but it generally does not hurt to ask. If necessary, arrangements can usually be made to obtain electronic copies on an expedited basis after the search, in order to minimize the adverse impact on the company’s operations.

- **Ask for split samples when agents seize samples, such as in environmental investigations.**
  - If a split sample is refused, take your own parallel sample (which you will probably wish to do under monitored circumstances once the agents have left the premises).

- **Advise the lead agent of any classified documents that are seized.**
  - Classified documents are not exempt from search and seizure, but the agents should be advised of the status of such documents if the company has an obligation to protect classified information. If classified documents are seized, the agency with jurisdiction over the information should be notified immediately.

- **Do not discuss the search with the media or others, except for legal counsel.**
  - It is best to only discuss the search with legal counsel. Discussing the search with the media or other individuals can contribute to the circulation of conflicting information and may trigger unnecessary follow-up investigations.

### The Search Warrant Checklist

**DOs**

- ✓ Identify and meet with the lead agent. Learn the identity of the supervising prosecutor.
- ✓ Ask for a copy of the search warrant and review it carefully.
- ✓ Determine whether agents are detaining employees.
- ✓ Advise employees of their rights – including the right to counsel.
- ✓ Object to the seizure of privileged documents.
- ✓ Make a record of events as they unfold.
- ✓ Ask to be present when agents make an inventory of seized materials.
- ✓ Make your own inventory of seized materials.
- ✓ Ask for copies of seized computer files.
- ✓ Ask for split samples.
- ✓ Advise the lead agent of any classified documents that are seized.

**DO NOTs**

- × Do not interfere with the search or allow anyone to alter, hide, or destroy documents.
- × Do not consent to the search of any area or seizure of any materials.
- × Do not volunteer substantive information.
- × Do not instruct or encourage anyone not to speak with the agents.
RESOURCES
## Notification List & Crisis Team Roster

### CO-PRESIDENT

<table>
<thead>
<tr>
<th>Name</th>
<th>Title</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chris Traylor</td>
<td>Co-President</td>
</tr>
</tbody>
</table>

**CMT Responsibilities:**

- Ultimate corporate crisis management decision authority
- Communicates with the Board of Directors

<table>
<thead>
<tr>
<th>Office</th>
<th>Cell</th>
<th>Email</th>
</tr>
</thead>
<tbody>
<tr>
<td>(812) 474-3200</td>
<td>(812) 589-9115</td>
<td><a href="mailto:c.traylor@traylor.com">c.traylor@traylor.com</a></td>
</tr>
</tbody>
</table>

### CO-PRESIDENT

<table>
<thead>
<tr>
<th>Name</th>
<th>Title</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mike Traylor</td>
<td>Co-President</td>
</tr>
</tbody>
</table>

**CMT Responsibilities:**

- Ultimate corporate crisis management decision authority
- Communicates with the Board of Directors

<table>
<thead>
<tr>
<th>Office</th>
<th>Cell</th>
<th>Email</th>
</tr>
</thead>
<tbody>
<tr>
<td>(562) 264-2502</td>
<td>(323) 369-0781</td>
<td><a href="mailto:m.traylor@traylor.com">m.traylor@traylor.com</a></td>
</tr>
</tbody>
</table>

### CRISIS MANAGER

<table>
<thead>
<tr>
<th>Name</th>
<th>Title</th>
</tr>
</thead>
<tbody>
<tr>
<td>Steve Owen</td>
<td>General Counsel</td>
</tr>
</tbody>
</table>

**Core CMT Responsibilities:**

- Serves as company spokesman
- Performs media interviews and appearances
- Directs overall CMT response

<table>
<thead>
<tr>
<th>Office</th>
<th>Cell</th>
<th>Email</th>
</tr>
</thead>
<tbody>
<tr>
<td>(812) 474-6569</td>
<td>(812) 453-2535</td>
<td><a href="mailto:s.owen@traylor.com">s.owen@traylor.com</a></td>
</tr>
</tbody>
</table>

### DEPUTY CRISIS MANAGER

<table>
<thead>
<tr>
<th>Name</th>
<th>Title</th>
</tr>
</thead>
<tbody>
<tr>
<td>Eric Friend</td>
<td>Insurance and Compliance Manager</td>
</tr>
</tbody>
</table>

**Core CMT Responsibilities:**

- Assists Crisis Manager with overall CMT response with a focus on administrative tasks
- Serves as acting Crisis Manager in Crisis Manager’s absence

<table>
<thead>
<tr>
<th>Office</th>
<th>Cell</th>
<th>Email</th>
</tr>
</thead>
<tbody>
<tr>
<td>(812) 474-6567</td>
<td>(812) 205-8524</td>
<td><a href="mailto:e.friend@traylor.com">e.friend@traylor.com</a></td>
</tr>
</tbody>
</table>

### COMMUNICATIONS COORDINATOR

<table>
<thead>
<tr>
<th>Name</th>
<th>Title</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ashlea Scaglione</td>
<td>Marketing Manager</td>
</tr>
</tbody>
</table>

**Core CMT Responsibilities:**

- Prepare press releases for executive approval before releasing
- Ensure consistent messaging across all communication channels
- Monitors the public’s response and media reporting

<table>
<thead>
<tr>
<th>Office</th>
<th>Cell</th>
<th>Email</th>
</tr>
</thead>
<tbody>
<tr>
<td>(562) 264-2531</td>
<td>(562) 217-2808</td>
<td><a href="mailto:a.scaglione@traylor.com">a.scaglione@traylor.com</a></td>
</tr>
</tbody>
</table>
OSHA SAFETY COORDINATOR

Name: Lee Dutcher  
Title: Safety Director

CMT Responsibilities:

- Facilitates site safety in the wake of a crisis
- Leads investigative efforts if crisis pertains to safety, synthesizes information to better understand the situation and its causes
- Implements changes to prevent the situation from occurring again

Office: (812) 474-3205  
Cell: (812) 453-6035  
Email: ldutcher@traylor.com

IT SPECIALIST

Name: Chad Lamb  
Title: Network Administrator

CMT Responsibilities:

- Updating website with any announcements or resources; may include launching a dark site
- Performing IT forensics if applicable
- Assist with the retention and gathering of electronic data relevant to the event

Office: (812) 474-3213  
Cell: (812) 568-8809  
Email: clamb@traylor.com

HUMAN RESOURCES COORDINATOR

Name: Wesley Rees  
Title: Director of Human Resources

CMT Responsibilities:

- Establishes, coordinates and initiates contact with family members to notify with updates and information as such become available
- Coordinates clergy and other special groups to assist with family needs

Office: (812) 474-3235  
Cell: (812) 459-1835  
Email: wrees@traylor.com

The below individuals serve as point persons for the various major office and yards throughout the United States.

POINT PERSONS (MAJOR OFFICES AND YARDS)

CMT Responsibilities (if crisis occurs within one’s respective area):

- Monitors situation and relays information to the wider CMT.
- Serves as the contact person on the ground and carries out the directions of the CMT.

EVANSVILLE OFFICE

Steve Owen  
General Counsel  
Office: (812) 474-6569  
Cell: (812) 453-2535

LONG BEACH OFFICE

George Cunningham  
Division Controller  
Office: (562) 264-2501  
Cell: (949) 466-1657

ALEXANDRIA OFFICE

Mike Krulc  
Area Manager  
Office: (703) 683-8350  
Cell: (323) 633-0609
The below individuals serve as point persons for a particular project. The below table should be updated with the appropriate names and contact information for each project. A copy of the Crisis Management Plan and updated table below should be readily accessible on all project sites.

<table>
<thead>
<tr>
<th>BATON ROUGE OFFICE</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Greg Cangelosi</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>YARDS</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Dan Daugherty</strong></td>
</tr>
<tr>
<td><strong>Jason Cain</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>PRECAST</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Bryce Scofield</strong></td>
</tr>
</tbody>
</table>

**PROJECT SPECIFIC PERSONNEL**

CMT Responsibilities (if crisis occurs at the project site):

- Monitors situation and relays information to the wider CMT.
- Serves as the contact person on the ground and carries out the directions of the CMT.

<table>
<thead>
<tr>
<th>[INSERT PROJECT NAME HERE]</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name:</td>
</tr>
<tr>
<td>Name:</td>
</tr>
<tr>
<td>Name:</td>
</tr>
<tr>
<td>Name:</td>
</tr>
<tr>
<td>Name:</td>
</tr>
</tbody>
</table>
ATTACHMENT 2

SAMPLE HOLDING STATEMENT

For Immediate Release

Contact: [NAME]
[TITLE]
[PHONE NUMBER]
[E-Mail]

[INCIDENT] AT [PROJECT OR SITE]

The following statement was issued today by [NAME OF COMPANY]:

[LOCATION (E.G., EVANSVILLE, IN)]: At approximately [TIME] there was what is currently being investigated as a [BRIEF GENERAL DESCRIPTION – FIRE, COLLAPSE, ETC.] at [PROJECT NAME, LOCATION].

We are working to determine [DAMAGE, INJURIES, ETC.]. At this time, we have confirmed that [GENERAL INFORMATION THAT IS FOR CERTAIN (E.G., ONE PERSON WAS INJURED AND IS CURRENTLY BEING TREATED, ETC.) DELETE THIS SECTION IF NO CONFIRMED INFO IS AVAILABLE.] The safety and well-being of our employees, contractors and neighbors is our first priority [EXPRESSION OF COMPASSION/CONCERN IF APPROPRIATE].

As more information becomes available, we will be providing updates through [WEB SITE ADDRESS] and regular media briefings.

Note for Media: Media briefings will be held at [LOCATION] at [TIME – SPECIFIC TIME, OR GENERAL, I.E., EVERY HOUR ON THE HOUR, ETC.]. In the meantime, please direct all questions to the [NAME OF COMPANY]’s spokesperson, Steve Owen, at (812) 477-1542.

###
# ATTACHMENT 3

## MEDIA LOG

PLEASE PRINT ALL INFORMATION CLEARLY

<table>
<thead>
<tr>
<th>Media Person &amp; Organization Name</th>
<th>Phone Numbers (Office/Cell)</th>
<th>E-mail address</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
ATTACHMENT 4

ADDITIONAL GUIDANCE FOR CRISIS MANAGEMENT TEAM

Crisis Management Plan (Continued)

The remaining steps of the Crisis Management Plan primarily deal with media relations. *Such relations should be handled exclusively by the Crisis Management Team.* The media is a critical tool in keeping the public informed about the event. This is particularly true of local media outlets as these will serve as the main information source for the communities surrounding the site (including employees, their families, and other community stakeholders). The regional wire service reporter may also have a direct impact on shaping coverage if the event is covered on a wider scale. As such, the CMT should work most closely with these members of the media.

**Step 4: Initial Media Contact, Developing Messages and Orchestrating a Response**

*Initial Contact with the Media*

In some cases, the media may be alerted to the situation before all the facts can be determined. **Even if all the information is not yet known, it is important to notify the CMT, who will provide the media with a generic statement indicating that the situation is being investigated and that updated information will be provided once it is available.** A sample holding statement is available in the *Resources* section of this manual as Attachment 2.

Unless otherwise instructed, employees should politely decline to answer substantive questions, referring these to the Company spokesperson. These include queries referring to the following:

- Names, addresses, descriptions or photographs of witnesses, perpetrators, and victims
- Information about ongoing operations or investigations
- Company operating procedures, including those which may have been violated leading up to the event
- Specifics of the event, including potential causes, its overall severity, and the damage toll

*Creating a Media Space*

If a media presence arrives at the site, the point person should determine a central gathering point for media personnel a safe distance away from the scene and other job operations. Media personnel should be directed to that area, informed that official statements are forthcoming, and that the investigation is ongoing. Direct all substantive media inquiries to the Crisis Manager.

The point person or his or her designee should also begin compiling a log of persons from the media, including their employers, phone numbers, and email addresses to help facilitate continued communication. A sample form for this purpose is provided as Attachment 3 in the *Resources* section of this manual.

Managing media coverage is a crucial element of crisis management. The goal of the Company is to balance a desire to give media professionals timely, accurate information with the need to protect the privacy and safety of employees and individuals involved in the crisis.

Based on the latest known information, the CMT should assess the seriousness of the crisis and begin a coordinated and proportional response. During this step, the CMT should perform the following:

- Generate a list of key information points to be conveyed to the public.
- Predict the sort of questions that could be asked by a variety of audiences (families, media, subcontractors, Owners, etc.) and contemplate appropriate responses.
- Modify any pre-scripted messages or develop new messages in light of known facts as appropriate.
• Be prepared to defend the Company’s record or practices as such relates to the crisis situation (e.g., if a worker is injured, reaffirm the Company’s commitment to safety and proven safety record).
• Identify the best methods for delivery of key messages.
• Update messaging as more information becomes available and provide frequent updates to the various stakeholders.
• Remain informed of the status of those individuals affected and ensure they are offered the services necessary to recover.

**Step 5: Messaging Approval and Delivery**

Before release, all messages should be approved by executive leadership and the Crisis Manager. Any suggested edits made thereby should be discussed and implemented as appropriate before official release. This process should repeat with any other messages, including updates or modifications to previously released updates.

The police and fire departments may have public information officers at the scene and the CMT should coordinate the release of information with them.

Ensure public communications comply with any applicable contract requirements.

To avoid jeopardizing the safety of individuals or the effectiveness of an investigation or operation, the CMT should clear all information with any public information officers before communicating with the media when applicable.

Messages should be released in a variety of formats, including press releases, media interviews, and postings on the Company’s website and social media accounts. It is important that consistency is achieved across all platforms in terms of the content and tone of the message.

**Step 6: Monitor and Provide Feedback**

During and after the crisis, the CMT must monitor the public’s reaction to the event and any subsequent messaging. The following steps are important in order to identify trends and curtail false narratives:

• Review the various media outlets, beginning with those that have specifically inquired about the event. However, as the perceived significance of a crisis grows, so does its newsworthiness and corresponding coverage. If coverage has gained wider traction, the scope of review will likely need to expand to include more outlets and a broader geographical area.
• Such a review should be comprehensive and include sources such as industry media, online messaging boards, and social media.
  o Perform regular searches online through reputable search engines using key words that could conceivably appear in pertinent articles or posts (e.g., Company name, site, type of crisis, etc.).
  o Conduct similar searches on all major social media platforms.
• Identify story trends with the aim of determining the media’s focus and whether that focus is shifting to new aspects of the crisis previously not addressed.
• Detect patterns of questions or concerns that seem to be recurring and use that data to draft subsequent messages for approval and release.

Even after the immediate effects of the crisis subside, continued monitoring may be necessary to ensure a smooth return to normal operating procedures.
The internet is increasingly becoming the primary way one receives information. By implementing a “dark site” and an effective social media strategy, the Company can help ensure all of the major communication channels are covered and that the Company’s messaging reaches the intended audiences.

Dark Sites

A “dark site” is a pre-developed, non-public website that is prepared in advance of an emergency but is not viewable on a regular basis. Instead, the dark site can quickly be made viewable once a crisis occurs, either by providing a link to the dark site on the home page of the Company’s website or, if the crisis is particularly severe, by temporarily replacing the entire home page with the dark site. For brand consistency, dark sites typically look similar to the normal website they are replacing or supplementing. As always, before information is made available on a dark site, it should be submitted to the CMT and approved by the Crisis Manager.

Developing such a site should be done proactively to help lessen the workload during an actual crisis. Dark sites help to control the conversation by being a reliable, easily accessible source for updates and information. Additionally, dark sites promote transparency, which in turn generates trust among those affected, the media, and the general public. Lastly, launching a dark site demonstrates that the crisis is being taken seriously and assures stakeholders that the incident is actively being addressed.

Information typically made available on a dark site includes the following:

- Up-to-date fact sheets highlighting accurate and key details surrounding the crisis;
- Special instructions letting all those affected by the crisis what they must or must not do;
- A breakdown of the specific steps being taken to overcome the crisis, updated accordingly;
- Contact information for the news media;
- Contact information for members of the public affected by the crisis;
- Company information, history, statistics, safety record, etc.;
- References to other websites that could provide additional information; and
- Any other information or source that promotes a clear understanding of the situation.

Corporate Social Media Response

The reach of an effective crisis communication plan extends to interactions on social media. Social media is a powerful tool in reaching a multitude of users in a way that seems more personal and informal. It is imperative, however, that the Company retains its “one voice” across all platforms. The tone and content of any post are especially important in social media as any statement can be further disseminated with ease by anyone.

Launching a strong social media campaign in response to a crisis includes performing the following actions:

- Pause your scheduled posts
  - Dedicate all social media efforts to crisis response. Refrain from regularly scheduled posts until the crisis period passes and the CMT determines a return to normal operating procedures is appropriate.
- Publicly acknowledge the situation.
  - Be visible, active, and responsive on social media. Even if no updates are available, communicate regularly (even if it means just saying that the investigation is still ongoing) to stay in touch with the audience.
- Provide links to the Company website or other sites for updated information as it becomes available.
  - Small tidbits or quotes from lengthier statements are acceptable alongside a link to the full statement. Be mindful of tone and context at all times.
- Ensure all officially released statements and updates are communicated via social media.
Reposting updates may be necessary to account for users entering and leaving the conversation at different times. Alternatively, direct users to the Company’s main social media page for a history of all related posts.

- Interact directly with individuals through social media by responding to questions that can be answered by reference to prior press releases and approved messaging. For those questions that cannot be readily answered, assure the individual that you will pass the question along and that more information will be released as it becomes available.
  - Prioritize those individuals who seem genuinely concerned or reasonably upset. Avoid engaging with “trolls” or other unreasonable individuals.
- Avoid pre-scripted, automated, or robotic messages.
  - Instead, be sincere, real, and empathetic. Social media is meant to be personal, informal, and interactive. It is important individuals feel heard and respected, especially during sensitive situations.

**Working with Family Members**

Keeping the families of those directly affected by the crisis informed about the situation is critical and should be a priority for the CMT. Below is a checklist of some steps that may be necessary to ensure attentiveness to the needs of families:

- Coordinate with local not for profit response agencies/organizations or other community resources to ensure the family is supported with food, counseling, religious support, or other forms of assistance.
- Confirm any information provided to families about their loved one is accurate.
- Inform family members of any updates before making any announcements to the media.
- Be prepared to handle or address difficult questions pertaining to fault/blame, compensation, lawsuits, timelines, etc.
ATTACHMENT 5
REPORTING HAZARDOUS AND EXTREMELY HAZARDOUS SUBSTANCE RELEASES

REMEMBER: IN THE EVENT OF A RELEASE OF A LISTED SUBSTANCE ABOVE THE REPORTABLE QUANTITY (RQ) IN A 24-HOUR PERIOD...

- If the substance appears **only on the CERCLA list** (aka: Hazardous Substance), you must complete the reporting requirements of **both CERCLA and EPCRA**.
- If the substance appears **on both the CERCLA list** (aka: Hazardous Substance) and the **EPCRA list** (aka Extremely Hazardous Substance), you must complete the reporting requirements of **both CERCLA and EPCRA**.
- If the substance appears **only on the EPCRA list** (aka: Extremely Hazardous Substance), you must complete the reporting requirements of **EPCRA only**.

---

### CERCLA
*Comprehensive Environmental Response, Compensation, & Liability Act*

<table>
<thead>
<tr>
<th>Citation:</th>
<th>40 CFR 302</th>
</tr>
</thead>
<tbody>
<tr>
<td>Administrative agency:</td>
<td>US EPA</td>
</tr>
<tr>
<td>Must report releases of:</td>
<td>Hazardous Substances</td>
</tr>
<tr>
<td>Identified at:</td>
<td>Table 302.4 of 40 CFR 302</td>
</tr>
<tr>
<td>When a release is:</td>
<td>Equal to or greater than the Reportable Quantity (RQ) in a 24-hour period</td>
</tr>
<tr>
<td>Must immediately notify:</td>
<td>The National Response Center</td>
</tr>
<tr>
<td>Form of immediate notification (within 15 minutes) must be:</td>
<td>Phone 800.424.8802 (202.267.2675 in Washington, DC) or Fax 202.267.1322</td>
</tr>
<tr>
<td>Immediate notification must be made by:</td>
<td>Owner, operator, or person in charge</td>
</tr>
<tr>
<td>Follow-up notification must be:</td>
<td>None required</td>
</tr>
<tr>
<td>If release occurs during transportation or storage incident to transportation:</td>
<td>Same notification process as general release</td>
</tr>
</tbody>
</table>
| Releases exempt from notification requirements: | 1. Releases of radionuclides meeting the criteria identified at 40 CFR 302.6(c).  
2. RQ releases of solid particles of antimony, arsenic, beryllium, cadmium, chromium, copper, lead, nickel, selenium, silver, thallium, or zinc is not required if the mean diameter of the particles released is >100 micrometers (0.004 inches). [see 40 CFR 302.6(d)].  
3. Releases in amounts <1,000 lb./24 hrs. of nitrogen oxide, or nitrogen dioxide to the air which are the result of combustion and combustion-related activities [see 40 CFR 302.6(e)(1-2)].  
4. Release to the air of any hazardous substance from animal waste at farms [see 40 CFR 302.6(e)(3)]. |
| **EPCRA**  
| *Emergency Planning and Community Right to Know Act* |
| --- | --- |
| **Citation:** | 40 CFR 355 |
| **Administrative agency:** | US EPA |
| **Must report releases of:** | Hazardous Substances and Extremely Hazardous Substances |
| **Identified at:** | Table 302.4 of 40 CFR 302  
and Appendix A of 40 CFR 355  
and Appendix B of 40 CFR 355 |
| **When a release is:** | Equal to or greater than the Reportable Quantity (RQ) in a 24-hour period |
| **Must immediately notify:** | Community emergency coordinator for the Local Emergency Planning Committee (LEPC) of any area likely to be affected by the release. Notify relevant local emergency response if no LEPC. and State Emergency Response Commission (SERC) of any State likely to be affected by the release. |
| **Form of immediate notification (within 15 minutes) must be:** | Oral with information required by 40 CFR 355.40(a). |
| **Immediate notification must be made by:** | Owner, operator, or person in charge |
| **Follow-up notification must be:** | Written as soon as practicable after the release (within 30 days) with information required by 40 CFR 355.40(b). |
| **If release occurs during transportation or storage incident to transportation:** | Notify 911 operator, or regular operator if 911 not available, immediately with information required by 40 CFR 355.40(a). |
| **Releases exempt from notification requirements:** | 1. Release results in exposure to persons solely within the boundaries of your facility.  
2. Release that is a federally permitted release as defined in 42 USC § 9601(10).  
3. Release of a pesticide product that is exempt from reporting under 42 USC §9603(e).  
4. Release that does not meet the definition of release under 42 USC § 9601(22) and is therefore exempt from CERCLA reporting.  
5. Radionuclide release that occurs in accordance with 40 CFR 355.31(e).  
6. Release less than 1,000 lb./24 hrs. of nitrogen oxide or nitrogen dioxide to the air which is the result of combustion and combustion related activities. |
Oil Discharge Reporting Requirements

How to Report Oil Discharges to the National Response Center and EPA

If a facility or vessel discharges oil to navigable waters or adjoining shorelines, waters of the contiguous zone, or in connection with activities under the Outer Continental Shelf Lands Act or Deepwater Port Act of 1974, or which may affect natural resources under exclusive U.S. authority, the owner/operator is required to follow certain federal reporting requirements. These requirements are found in two EPA regulations – 40 CFR part 110, Discharge of Oil regulation, and 40 CFR part 112, Oil Pollution Prevention regulation. The Discharge of Oil regulation provides the framework for determining whether an oil discharge to inland and coastal waters or adjoining shorelines should be reported to the National Response Center. The Oil Pollution Prevention regulation, part of which is commonly referred to as the “SPCC rule,” identifies certain types of discharges from regulated facilities that also need to be reported to EPA. Although these reporting requirements were not changed by EPA’s recent modifications of the SPCC rule, this Fact Sheet will help facilities with the Reportable Discharge History criterion associated with the qualified facility option and the oil-filled operational equipment option offered in the recent SPCC modifications.

Who is subject to the Discharge of Oil regulation?

Any person in charge of a vessel or of an onshore or offshore facility is subject to the reporting requirements of the Discharge of Oil regulation if it discharges a harmful quantity of oil to U.S. navigable waters, adjoining shorelines, or the contiguous zone, or in connection with activities under the Outer Continental Shelf Lands Act or Deepwater Port Act of 1974, or which may affect natural resources under exclusive U.S. authority.

What is a “harmful quantity” of discharged oil?

A harmful quantity is any quantity of discharged oil that violates state water quality standards, causes a film or sheen on the water’s surface, or leaves sludge or emulsion beneath the surface. For this reason, the Discharge of Oil regulation is commonly known as the “sheen” rule. Note that a floating sheen alone is not the only quantity that triggers the reporting requirements (e.g., sludge or emulsion deposited below the surface of the water may also be reportable).

Under this regulation, reporting oil discharges does not depend on the specific amount of oil discharged, but instead can be triggered by the presence of a visible sheen created by the discharged oil or the other criteria described above.

To whom do I report an oil discharge?

A facility should report discharges to the National Response Center (NRC) at 1-800-424-8802 or 1-202-426-2675. The NRC is the federal government’s centralized reporting center, which is staffed 24 hours per day by U.S. Coast Guard personnel.

If reporting directly to NRC is not practicable, reports also can be made to the EPA regional office or the U.S. Coast Guard Marine Safety Office (MSO) in the area where the incident occurred.

When must I report to NRC?

Any person in charge of a vessel or an onshore or offshore facility must notify NRC immediately after he or she has knowledge of the discharge.

What information do I need to report?

NRC will ask a caller to provide as much information about the incident as possible including:

- Name, organization, and telephone number
- Name and address of the party responsible for the incident
- Date and time of the incident
- Location of the incident
- Source and cause of the discharge
- Types of material(s) discharged
- Quantity of materials discharged
- Danger or threat posed by the discharge
- Number and types of injuries (if any)
- Weather conditions at the incident location
- Other information to help emergency personnel respond to the incident

**How are reports to NRC handled?**

NRC relays information to an EPA or U.S. Coast Guard On Scene Coordinator (OSC), depending on the location of the incident. After receiving a report, the OSC evaluates the situation and decides if federal emergency response action is necessary.

**If I report a discharge to NRC, do I also report to EPA?**

If a facility is regulated under the SPCC rule and has a reportable discharge according to EPA regulations (see below), it must be reported to both NRC and EPA.

**What are the oil discharge reporting requirements in the SPCC rule?**

Any facility owner/operator who is subject to the SPCC rule must comply with the reporting requirements found in §112.4.

A discharge must be reported to the EPA Regional Administrator (RA) when there is a discharge of:

- More than 1,000 U.S. gallons of oil in a single discharge to navigable waters or adjoining shorelines
- More than 42 U.S. gallons of oil in each of two discharges to navigable waters or adjoining shorelines occurring within any twelve-month period

When determining the applicability of this SPCC reporting requirement, the gallon amount(s) specified (either 1,000 or 42) refers to the amount of oil that actually reaches navigable waters or adjoining shorelines, not the total amount of oil spilled.

**What do I need to submit to EPA?**

The owner/operator must provide the following:

- Name and location of the facility
- Owner/operator name
- Maximum storage/handling capacity of the facility and normal daily throughput
- Corrective actions and countermeasures taken, including descriptions of equipment repairs and replacements

- Adequate description of the facility, including maps, flow diagrams, and topographical maps, as necessary
- Cause of the discharge to navigable waters, including a failure analysis
- Failure analysis of the system where the discharge occurred
- Additional preventive measures taken or planned to take to minimize discharge reoccurrence
- Other information the RA may reasonably require

An owner/operator must also send a copy of this information to the agency or agencies in charge of oil pollution control activities in the state in which the facility is located.

**What happens after a facility submits this information to EPA?**

The EPA Regional Administrator will review the information submitted by the facility and may require a facility to submit and amend its SPCC Plan. Facilities and equipment that qualified for the new streamlined requirements may lose eligibility for those options as determined by the Regional Administrator. A state agency may also make recommendations to EPA for a facility to amend its Plan to prevent or control oil discharges.

---

**For More Information**

- Review the Discharge of Oil regulation (40 CFR part 110)
  http://www.gpoaccess.gov/cfr/
- Review the Oil Pollution Prevention regulation (40 CFR part 112)
  http://www.gpoaccess.gov/cfr/
- Visit the EPA Office of Emergency Management Web site
  www.epa.gov/emergencies
- Call the Superfund, TRI, EPCRA, RMP, and Oil Information Center
  (800) 424-9346 or (703) 412-9810
  TDD (800) 553-7672 or (703) 412-3323
  www.epa.gov/superfund/resources/infocenter

**To Report an Oil or Chemical Discharge**

- Contact the National Response Center
  (800) 424-8802 or (202) 267-2675
  TDD (202) 267-4477
HELPING WITH THE HUMAN SIDE OF RECOVERY

When a disruptive event occurs, such as a serious workplace accident with significant loss, injury, or fatality, the experts at R3 Continuum (R3) are here to help with the human side of recovery. R3 consultants deliver customized on-site or telephonic responses to impacted employees and leadership, using proven strategies that help personnel return to work and life.

Please inform your manager whenever R3 services are initiated.

To Initiate On-Site Services: Call 888-736-0911 (Press Option 1)

Disruptive Event Management (DEM)
- Assists leadership in developing an effective response plan for the company
- Normalizes employee’s common behavioral and psychological reactions to the event and helps them build on their natural resilience and recovery
- Identifies those individuals who might need additional support for recovery
- Available 24/7/365 in US and Canada - same day or within 24 hours of request

To Initiate Telephonic Services: Call 888-736-0911 (Press Option 2)

Telephonic Support
An effective, convenient, and economical way to provide direct behavioral health support to employees who have been affected by a disruptive event.
- Outreach: immediate, individualized intervention with 3 outreach support calls to each identified employee over 10 days; 24/7 access to experienced, master’s level clinicians for telephonic support
- On-demand: discrete, dedicated support line with 24/7 access to experienced, master’s level clinicians for telephonic support over 30 days
BOMB THREAT PROCEDES

This quick reference checklist is designed to help employees and decision makers of commercial facilities, schools, etc. respond to a bomb threat in an orderly and controlled manner with the first responders and other stakeholders.

Most bomb threats are received by phone. Bomb threats are serious until proven otherwise. Act quickly, but remain calm and obtain information with the checklist on the reverse of this card.

If a bomb threat is received by phone:
1. Remain calm. Keep the caller on the line for as long as possible. DO NOT HANG UP, even if the caller does.
2. Listen carefully. Be polite and show interest.
3. Try to keep the caller talking to learn more information.
4. If possible, write a note to a colleague to call the authorities or, as soon as the caller hangs up, immediately notify them yourself.
5. If your phone has a display, copy the number and/or letters on the window display.
6. Complete the Bomb Threat Checklist immediately. Write down as much detail as you can remember. Try to get exact words.
7. Immediately upon termination of call, DO NOT HANG UP, but from a different phone, contact authorities immediately with information and await instructions.

If a bomb threat is received by handwritten note:
- Call _____________________________________
- Handle note as minimally as possible.

If a bomb threat is received by e-mail:
- Call _____________________________________
- Do not delete the message.

Signs of a suspicious package:
- No return address
- Poorly handwritten
- Excessive postage
- Misspelled words
- Stains
- Incorrect titles
- Strange odor
- Foreign postage
- Strange sounds
- Restrictive notes
- Unexpected delivery

* Refer to your local bomb threat emergency response plan for evacuation criteria

DO NOT:
- Use two-way radios or cellular phone. Radio signals have the potential to detonate a bomb.
- Touch or move a suspicious package.

WHO TO CONTACT (Select One)
- 911
- Follow your local guidelines

For more information about this form contact the DHS Office for Bombing Prevention at OBP@dhs.gov

---

BOMB THREAT CHECKLIST

<table>
<thead>
<tr>
<th>DATE:</th>
<th>TIME:</th>
</tr>
</thead>
<tbody>
<tr>
<td>TIME CALLER</td>
<td>PHONE NUMBER WHERE CALL RECEIVED:</td>
</tr>
<tr>
<td>HUNG UP:</td>
<td></td>
</tr>
</tbody>
</table>

Ask Caller:
- Where is the bomb located? (building, floor, room, etc.)
- When will it go off?
- What does it look like?
- What kind of bomb is it?
- What will it make it explode?
- Did you place the bomb? Yes No
- Why?
- What is your name?

Exact Words of Threat:

Information About Caller:
- Where is the caller located? (background/level of noise)
- Estimated age:
- Is voice familiar? If so, who does it sound like?
- Other points:

<table>
<thead>
<tr>
<th>Caller's Voice</th>
<th>Background Sounds</th>
<th>Threat Language</th>
</tr>
</thead>
<tbody>
<tr>
<td>Female</td>
<td>Animal noises</td>
<td>Incoherent</td>
</tr>
<tr>
<td>Male</td>
<td>House noises</td>
<td>Message read</td>
</tr>
<tr>
<td>Accent</td>
<td>Kitchen noises</td>
<td>Taped message</td>
</tr>
<tr>
<td>Angry</td>
<td>Street noises</td>
<td>Irrational</td>
</tr>
<tr>
<td>Calm</td>
<td>Booth</td>
<td>Profane</td>
</tr>
<tr>
<td>Clearing throat</td>
<td>Conversation</td>
<td>Well-spoken</td>
</tr>
<tr>
<td>Coughing</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cracking voice</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Crying</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Deep</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Deep breathing</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Disguised</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Distinct</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Excited</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Laughter</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Lisp</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Loud</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Nasal</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Normal</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ragged</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Rapid</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Respiry</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Slow</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Slurred</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Soft</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Stutter</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Other Information:

---

2014 Homeland Security
Crisis Defined
A crisis is a sudden event or set of circumstances that significantly disrupts normal business operations and which materially harms or threatens to harm the health and safety of people, the environment, property, or Traylor’s reputation.

When Calling 911
1) Remain calm and speak clearly.
2) Follow all the dispatcher's instructions.
3) If necessary, assign an individual to stand near the entrance and direct EMS to the scene as they arrive.
4) Do not hang up until instructed to do so.

First TBI Responder
Call 911
Notify Onsite Point Person

Onsite Point Person
O: ____________________
M: ____________________
- Notifies proper authorities
- Notifies member of CMT
- Serves as CMT liaison onsite
- Carries out CMT instruction onsite

Please note:
Additional obligations and notification requirements may apply. Consult applicable project-specific response protocols.

Crisis Management Team

Steve Owen
Crisis Manager
O: (812) 474-6569
M: (812) 453-2535
- Company's spokesman
- Performs media interviews
- Directs CMT response

Eric Friend
Deputy Crisis Manager
O: (812) 474-6567
M: (812) 205-8524
- Assists Crisis Manager
- Substitute Crisis Manager
- Serves as CMT liaison

Ashlea Scaglione
Communications Coordinator
O: (562) 264-2531
M: (562) 217-2808
- Drafts press releases
- Ensures consistent messaging
- Tracks public reaction

Lee Dutcher
OSHA Safety Coordinator
O: (812) 474-3205
M: (812) 459-1835
- Facilitates site safety
- Leads safety investigations
- Protects against repeat crises

Wesley Rees
Human Resources Coordinator
O: (812) 474-3235
M: (812) 459-1835
- Coordinates special needs
- Connects with victim's family
- Tracks victim's statuses

Chad Lamb
IT Specialist
O: (812) 474-3213
M: (812) 568-8809
- Keeps website updated
- Performs IT forensics
- Assists with data gathering

General Crisis Response Checklist
- Call 911 and notify Onsite Point Person
- Refer to Crisis Management Plan and any project-specific response protocols
- Secure the area to prevent further injury/damage
- Follow all Crisis Management Team / Onsite Point Person's instructions
[INSERT APPLICABLE CONTRACT PROVISIONS RELATING TO PUBLIC STATEMENTS AND OTHER PROJECT-SPECIFIC CONSIDERATIONS IN THIS ATTACHMENT.]
FIRE OR EXPLOSION
Appendix A

**Respond**
- Evaluate situation.
- If possible, extinguish.
- If necessary, call 911.
- Place look-out person at job site entrance.
- Maintain accessibility throughout site.
- Direct employees to central location.
- Tape off area and lock out equipment involved.

**Notify**
- Contact Corporate or Division Office for instructions on how to proceed with investigation. For contact information, see Attachment 1.
- Direct any media presence to predetermined location away from the scene. Log media contacts using Attachment 3.
- Refer all substantive questions from the media or otherwise to Steve Owen at Corporate Office.
- Refer victims and others affected to resources in Attachment 7.

**Investigate**
- Follow instructions given by Corporate or Division Office and begin investigation.
- Talk to witnesses, take pictures, and video.
- Seek answers to the following questions:
  - WHAT happened & where?
  - WHEN did this happen?
  - WHO is involved?
  - HOW did this happen?
  - WHAT is being done?

**Report**
- Complete all reports, photos, and/or video and forward to Corporate or Regional office.
- Follow-up with victims and others affected, keeping abreast of their conditions.
- Keep Crisis Management Team informed of all developments.
PERSONAL INJURY
Appendix B

Respond
- Evaluate situation.
- If necessary, call 911 or ambulance.
- Place look-out person at jobsite entrance.
- Have someone accompany the injured to the hospital if possible.
- Maintain accessibility throughout site.
- Tape off area and lock out equipment involved.

Notify
- Contact Corporate or Division Office for instructions on how to proceed with investigation. For contact information, see Attachment 1.
- If injured party is an employee, follow OSHA reporting process at bottom of page.
- Direct any media presence to predetermined location away from the scene. Log media contacts using Attachment 3.
- Refer all substantive questions from the media or otherwise to Steve Owen at Corporate Office.
- Refer victims and others affected to resources in Attachment 7.

Investigate
- Follow instructions given by Corporate or Division Office and begin investigation.
- Talk to witnesses, take pictures, and video.
- Seek answers to the following questions:
  - WHAT happened & where?
  - WHEN did this happen?
  - WHO is involved?
  - HOW did this happen?
  - WHAT is being done?

Report
- Complete all reports, photos, and/or video and forward to Corporate or Regional office.
- Follow-up with victims and others affected, keeping abreast of their conditions.
- Keep Crisis Management Team informed of all developments.
- If necessary, call 911 or ambulance.
- Refer victims and others affected to resources in Attachment 7.

Was it fatal?
- Yes
  - Was worker admitted to the hospital?
    - Yes
      - Report to OSHA within 8 hours
    - No
    - Was there an amputation or lost eye?
      - Yes
        - Report to OSHA within 24 hours
      - No
      - No report required

Was worker admitted to the hospital?
- Yes
  - Report to OSHA within 8 hours
- No
**SEVERE WEATHER**

*Appendix C*

---

**Respond**

- Evaluate situation.
- Take shelter in appropriate area.
- Stay away from areas with loose debris.
- Get all employees to a central location.

**Notify**

- Contact Corporate or Division Office for instructions on how to proceed with investigation. For contact information, see Attachment 1.
- Direct any media presence to predetermined location away from the scene. Log media contacts using Attachment 3.
- Refer all substantive questions from the media or otherwise to Steve Owen at Corporate Office.

**Investigate**

- Follow instructions given and begin investigation.
- Talk to witnesses, take pictures, and video.
- Seek answers to the following questions:
  - WHAT happened & where?
  - WHEN did this happen?
  - WHO is involved?
  - HOW did this happen?
  - WHAT is being done?

**Report**

- Complete all reports, photos, and/or video and forward to Corporate or Regional office.
- Follow-up with victims and others affected, keeping abreast of their conditions.
- Keep Crisis Management Team informed of all developments.
**ACTIVE SHOOTER**

**Appendix D**

---

**Escape**

- Evaluate situation.
- If possible, escape.
  - Evacuate regardless of whether others agree to follow.
  - Leave belongings behind and help others escape if possible.
  - When running, ignore the shooter's demands.
  - Prevent others from entering areas where the shooter may be.
  - Keep your hands visible.
  - Do not attempt to move wounded people.

**Hide**

- If escape is not possible, hide.
  - Be out of the shooter's view. Stay low to the ground.
  - Place large objects, furniture, trees, equipment, etc. between you and the shooter.
  - If indoors, close and lock door. Turn off lights and close blinds. Silence cell phone and other sources of audio (e.g., radios and TVs).
  - Block entrances with heavy objects.
  - Remain quiet.
  - Ignore fire alarms; watch for fire and smoke, instead.

**Fight**

- If neither escape nor hiding is possible, fight.
  - Attempt to disrupt or incapacitate the shooter by any means necessary.
  - Tackle, throw items, yell, fashion makeshift weapons.
  - Fully commit to your actions.
  - If part of a group, use your numbers to overwhelm the shooter.

**Report**

- Cooperate and follow any instructions given by police or other authorities. Drop anything in your hands.
- Contact Corporate or Division Office for instructions on how to proceed with investigation. For contact information, see Attachment 1.
- Refer those affected to resources in Attachment 7.
- Follow instructions given and begin investigation.
- Direct any media presence to predetermined location away from the scene. Log media contacts using Attachment 3.
- Refer all substantive questions from the media or otherwise to Steve Owen at Corporate Office.
- Complete all reports, photos, and/or video and forward to Corporate or Regional office.
- Follow-up with victims and others affected, keeping abreast of their conditions.
- Keep Crisis Management Team informed of all developments.

---

**Important Instructions**

Only call 911 if you can safely do so.

Be brief, calm, and specific when providing details.

Give the address and the shooter's location. Be prepared to offer a description of the shooter, including the weapon(s) used, any physical characteristics, and the number of victims.
Do not discipline employees for participating in a labor dispute.

Create a list of employees not scheduled to work in case substitute workers are needed.

If a striking employee returns to work after being replaced for the shift, tell them to return on their next scheduled shift.

If unable to find a replacement for the affected shift, allow the previously striking employee to return to work.

Do not question employees about whether they or others are planning to engage in a labor dispute.

Remind employees that they cannot block the entrance to the site or otherwise impede the project or others who want to work.

Contact Corporate or Division Office for instructions on how to proceed with investigation. For contact information, see Attachment 1.

Direct any media presence to predetermined location away from ongoing work. Log media contacts using Attachment 3.

Refer all substantive questions from the media or otherwise to Steve Owen at Corporate Office.

Follow instructions given and begin investigation.

Talk to witnesses, take pictures, and video.

Seek answers to the following questions:
WHAT happened & where?
WHEN did this happen?
WHO is involved?
HOW did this happen?
WHAT is being done?

Complete all reports, photos, and/or video and forward to Corporate or Regional office.

Keep Crisis Management Team informed of all developments.

Create a list of employees not scheduled to work in case substitute workers are needed.

Remind employees that they cannot block the entrance to the site or otherwise impede the project or others who want to work.
**POLLUTION RELEASE**  
Appendix F

---

**Respond**
- Evaluate situation.
- Secure the release site.
- Determine the substance.
- Determine the amount released.

**Notify**
- Provide Corporate or Division Office with information and await instructions on how to proceed with remedial action/investigation. For contact information, see Attachment 1.
- Direct any media presence to predetermined location away from the scene. Log media contacts using Attachment 3.
- Refer all substantive questions from the media or otherwise to Steve Owen at Corporate Office.

**Investigate**
- Follow instructions given by Corporate or Division Office and begin remedial actions and investigation.
- Talk to witnesses, take pictures, and video.
- Seek answers to the following questions:
  - WHAT happened & where?
  - WHEN did this happen?
  - WHO is involved?
  - HOW did this happen?
  - WHAT is being done?

**Report**
- Complete all reports, photos, and/or video and forward to Corporate or Regional office.
- Keep Crisis Management Team informed of all developments.

*Additional obligations and notification requirements may apply. Consult Attachment 5 and Attachment 6 of the Crisis Management Plan as well as any applicable project-specific response protocols.*
Comply

- Notify Legal Department at (812) 477-1542.
- Make a record of events as they unfold.
- Do not interfere with the search.
- Do not allow anyone to alter, hide, or destroy documents.
- Do not consent to the search of any area or seizure of any materials.
- Do not volunteer substantive information.
- Do not instruct or encourage anyone to refrain from speaking with the agents.

Inquire

- Identify and meet with the lead agent. Determine identity of supervising prosecutor.
- Ask for a copy of the warrant and review it carefully.
- Ask to be present when agents make an inventory of seized materials. Make your own inventory alongside.
- Ask for copies of seized computer files.
- Determine whether agents are detaining employees.

Respond

- Advise employees of their rights - including the right to counsel.
- Advise employees not to discuss the search with others, except legal counsel. Employees may, but are not required to answer questions posed to them by agents.
- Consider sending employees home.
- Advise the lead agent of any classified documents that are seized.
- Object to the seizure of privileged documents.

Report

- Forward copies of warrant, inventory of seized materials, and all other gathered information to Corporate or Division office.
- Keep Crisis Management Team informed of all developments.

Additional guidance can be found in the Crisis Management Plan on page 7.
PROPERTY DAMAGE
Appendix H

**Respond**
- Evaluate situation.
- Secure the impacted area.
- Ensure there is no risk of further damage.
- Determine the extent of the damage.

**Notify**
- Contact Corporate or Division Office for instructions on how to proceed with investigation. For contact information, see Attachment 1.
- Direct any media presence to predetermined location away from the scene. Log media contacts using Attachment 3.
- Refer all substantive questions from the media or otherwise to Steve Owen at Corporate Office.

**Investigate**
- Follow instructions given and begin investigation.
- Talk to witnesses, take pictures, and video.
- Seek answers to the following questions:
  - WHAT happened & where?
  - WHEN did this happen?
  - WHO is involved?
  - HOW did this happen?
  - WHAT is being done?

**Report**
- Complete all reports, photos, and/or video and forward to Corporate or Regional office.
- Keep Crisis Management Team informed of all developments.
**MENTAL TRAUMA**

**Appendix I**

---

**Respond**

- Evaluate situation.
- If necessary, call 911.
- Gather those affected into secured area.
- Pair each employee with a "buddy" for support and monitoring.
- Make contact with everyone to identify all harm (both physical and mental).
- Listen attentively. Acknowledge their feelings.
- Remind employees it is best not to talk to reporters. Answer any questions. Reconstruct the facts as far as able. Endeavor to provide updated information as it becomes available.
- Arrange transportation for anyone too distressed to drive safely.
- Refer individuals to resources at Attachment 7.

**Notify**

- Notify Corporate or Division Office and receive any additional guidance. For contact information, see Attachment 1.
- If applicable, direct any media presence to predetermined location away from those affected and ongoing operations. Log media contacts using Attachment 3.
- Refer all substantive questions from the media or otherwise to Steve Owen at Corporate Office.

**Follow-Up**

- Follow-up with those affected regularly.
- Remind those affected of the resources at Attachment 7.

**Report**

- Complete all reports, photos, and/or video and forward to Corporate or Regional office.
- Keep Crisis Management Team informed of all developments.
Respond

- Remain calm.

Notify

- IF BY PHONE:
  - Keep caller on the line as long as possible. Do NOT hang up, even if the caller does.
  - Record the call if possible.
  - Write a note to someone nearby instructing them to inform the ranking person on site who will direct any remaining steps.
  - If alone, call ranking person from a different phone once caller hangs up.
  - In the event ranking person cannot be quickly reached, call 911 directly.
  - Listen carefully, be polite, and show interest.
  - Try to keep caller talking to elicit information identified on Bomb List Checklist.
  - Complete Bomb Threat Checklist immediately. See Attachment 8.

- IF BY NOTE OR EMAIL:
  - Inform ranking person on site who will direct any remaining steps.
  - In the event ranking person cannot be quickly reached, call 911 directly.
  - Handle note as minimally as possible. Do NOT delete email.

- SUSPICIOUS PACKAGES:
  - Do NOT touch, tamper with, or move the package, bag, or item.
  - Inform ranking person on site who will direct any remaining steps.
  - Provide complete description to the authorities upon their arrival.

Investigate

- Follow instructions given by Corporate or Division Office and begin internal investigation if directed.
- Talk to witnesses, take pictures, and video.
- Seek answers to the following questions:
  - WHAT happened & where?
  - WHEN did this happen?
  - WHO is involved?
  - HOW did this happen?
  - WHAT is being done?
- Complete all reports, photos, and/or video and forward to Corporate or Regional office.
- Direct any media presence to predetermined location away from the scene. Log media contacts using Attachment 3.
- Refer all substantive questions from the media or otherwise to Steve Owen at Corporate Office.
- Refer those affected to resources in Attachment 7.

Report

- Keep Crisis Management Team informed of all developments.
- DO NOT: Use two-way radios or cellular phones. Radio signals have the potential to detonate a bomb.

DO NOT:
- Use two-way radios or cellular phones. Radio signals have the potential to detonate a bomb.