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Brunel Energy, Inc.

Emergency Action Plan

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1. Purpose

- 1.1. Brunel Energy, Inc., hereinafter referred to as, the “Company,” has established a program compliant with OSHA 29 CFR 1910.38 (or comparable state standards/regulations which provides for the development of general and site-specific emergency action plans.
- 1.2. Each Emergency Action Plan shall be prepared to reflect all known probable emergency conditions which may arise from within the workplace and from adjacent workplaces, the minimum of which will include fire or other emergencies.
- 1.3. The plans will be communicated to affected employees and made readily available for use. If a site has 10 or fewer employees, the plan may be orally communicated to employees.

2. Applicability

- 2.1. This policy applies to employees, subcontractors and/or visitor(s) of the Company. For the purposes of this policy, an employee shall be considered on the job whenever he/she is:
 - 2.1.1. On or in, any Company or client property, including parking areas; or
 - 2.1.2. On Company time even if off Company premises (including paid lunch, rest periods and periods of being on call).
- 2.2. As a condition of employment, Company employees are required to abide by additional governmental or customer policies and requirements that may be imposed at a worksite in addition to the requirements of these policies and procedures. Nothing set forth in this policy constitutes, construes, or interprets in any way as a contract of employment.

3. Definitions

- 3.1. An **Emergency** is any occurrence or series of occurrences which involve the health and safety of workers, or the public through a serious injury/fatality or major equipment failure. It is an unforeseen combination of circumstances or the resulting state that calls for immediate action. Examples of major emergencies are:
 - 3.1.1. Life threatening bodily injury, single fatality, or life-threatening illness.
 - 3.1.2. Medical evacuation from a foreign country.
 - 3.1.3. Major environmental or property damage (Greater than US \$50,000 and less than US \$100,000)
 - 3.1.4. Catastrophic Emergency – Events which may require management support as well as the expertise of all or part of the local Emergency Response Team such as:
 - 3.1.4.1. Multiple fatalities.
 - 3.1.4.2. Major fire or explosion on a drilling site/site or in the Company facility.
 - 3.1.4.3. Catastrophic environmental damage (greater than \$100,000)
 - 3.1.4.4. Catastrophic property damage (greater than \$100,000)
 - 3.1.4.5. Political or civil unrest, such as war or terrorist act.

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- 3.1.4.6. Medical epidemic.
- 3.1.4.7. Earthquake or other natural disaster.
- 3.1.4.8. Kidnapping or abduction.

3.2. **The Emergency Response Team** are key personnel identified by job title within an Emergency Action Plan and have clearly defined roles and responsibilities relating to the implementation, management, or support of emergency response functions within the organization.

4. Responsibilities

- 4.1. Manager(s) and HSE Supervisor(s):
 - 4.1.1. Shall design an emergency response team that will include designated roles and responsibilities for ensuring the welfare and safety of Company employees.
- 4.2. Employee(s):
 - 4.2.1. Shall be familiar with evacuation routes and procedures for all emergency situations. Employees will receive training to ensure safe and orderly emergency evaluation.
- 4.3. Subcontractor(s):
 - 4.3.1. Shall be familiar with evacuation routes and procedures for all emergency situations. Employees will receive training to ensure safe and orderly emergency evaluation.

5. Requirements

- 5.1. Designated emergency team leaders will conduct drills to ensure whether shelter space can hold all employees.
- 5.2. The emergency team leader will periodically check to verify all exits are marked with "Exit" signs with enough lighting so people can safely travel to an exit.
- 5.3. The emergency team will assist in safe orderly evacuation of other employees.
- 5.4. A pre-established briefing area shall be used as a muster point for all employees to assemble at for personnel count to determine if any employees from the work group are missing.
- 5.5. A level of incident severity shall be established and the decision to activate EMS shall be made. If emergency services are needed contact them and stay on the line to give directions to the location. An immediate supervisor shall also be notified of the emergency.
- 5.6. To ensure prompt evacuation of employees, a warning system (with a distinctive signal for each purpose) that can be heard throughout the building must be used. If there is no fire alarm system, a public address system such as air horns or other means to warn people to evacuate will be used. The evacuation signal will be sounded during planned drills, so employees are familiar with the sound.

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- 5.7. Evacuation route maps shall be posted in each work area. The following information is marked on evacuation maps:
 - 5.7.1. Emergency exits.
 - 5.7.2. Primary and secondary evacuation routes
 - 5.7.3. Locations of fire extinguishers
 - 5.7.4. Fire alarm pull stations.
 - 5.7.5. Assembly points
- 5.8. Site personnel should know at least two evacuation routes.
- 5.9. Each location/site shall appoint an evacuation team leader and assign employees to direct evacuation of the building. At least one person on each floor will act as a “floor warden” to direct employees to the nearest exit. The fire department should be contacted to develop a plan to evacuate people with disabilities.
- 5.10. Evacuation team leaders shall periodically walk the buildings to verify that exits are marked with “Exit” signs with enough lighting so people can safely travel to exit. Emergency exits shall never be blocked.
- 5.11. The emergency team leader will ensure employee emergency roles and contact information is kept current and distributed to all employees.

6. Procedure

- 6.1. Emergencies to Report
 - 6.1.1. The following emergencies shall be reported to Evacuation Team Leaders site personnel:
 - 6.1.1.1. Medical
 - 6.1.1.2. Hazardous Materials/Chemical Spill
 - 6.1.1.3. Adverse Weather
 - 6.1.1.4. Extended power loss
 - 6.1.1.5. Structure Climbing/Descending
 - 6.1.1.6. Bomb Threat
 - 6.1.1.7. Hostage, terrorist attack, other another like event
- 6.2. Emergency Fire Response
 - 6.2.1. If a fire is discovered, the nearest fire alarm or public address system will be used. Employees are not trained fire fighters or doctors; however, they are trained in the use of portable fire extinguishers and first aid. An employee must make an initial assessment to determine the level of assistance he or she is able and trained to provide without also incurring injuries.
 - 6.2.2. A fire should only be fought if:
 - 6.2.2.1. Not spreading to other areas,

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- 6.2.2.2. Escaping the area if possibly by backing up to the nearest exit.
- 6.2.2.3. The fire extinguisher is in working condition and
- 6.2.2.4. Personnel are trained to use it.
- 6.2.3. Occupants must leave the building using the appropriate exit routes, assemble in the muster point and remain outside until a designated official announces it is safe to return.
- 6.2.4. Designated officials/evacuation team members must:
 - 6.2.4.1. Ensure critical plant operations procedures are followed to operate critical plan operations prior to evacuation.
 - 6.2.4.2. Disconnect utilities and equipment unless doing so jeopardizes his/her safety.
 - 6.2.4.3. Coordinate an orderly evacuation of personnel.
 - 6.2.4.4. Perform an accurate head count of personnel reported to the designated area.
 - 6.2.4.5. Determine a rescue method to locate missing personnel.
 - 6.2.4.6. Provide the fire department personnel with necessary information about the facility.
 - 6.2.4.7. Perform assessment and coordinate weather forecast office emergency closing procedures.
- 6.2.5. Area/floor monitor must:
 - 6.2.5.1. Ensure that all employees have evacuated the area/floor.
 - 6.2.5.2. Report any problems to the emergency team leader at the assembly area.
 - 6.2.5.3. Individuals trained to assist physically challenged individuals shall assist all physically challenged employees, when needed, in emergency evacuation.
- 6.3. Medical Response
 - 6.3.1. Decisions and actions will vary according to circumstances that produced the accident or sudden illness, the number of persons involved, the immediate environment, the availability of medical assistance and an employee's preparedness to administer first aid.
 - 6.3.2. A medical emergency shall be evaluated by the most senior employee on location and the victim shall be administered first –aid by a trained responder.
 - 6.3.3. Call the nearest emergency service or Company office for help. Provide the rescuer a description of the problem or incident, indicate what is being done for the victim(s) or to control the accident scene and request assistance.
 - 6.3.4. Aid the location by sending someone to the nearest highway or other designated site.
 - 6.3.5. Communication with the person(s) providing First Aid and injury treatment is of the utmost importance. Keep the communications lines open nearest to those aiding the victims.
 - 6.3.6. If necessary, move the victim(s) to a safe location. DO NOT move victim(s) unless the threat of additional injury or death is imminent. Ensure that the victim has an open airway. Initiate rescue breathing if necessary. If personnel trained in First Aid are not available, at a minimum, attempt to stop the bleeding with firm pressure on the wounds (void contact with blood and bodily fluids) and clear air passages.
 - 6.3.7. Additional first aid Tips/instructions:

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- 6.3.7.1. Protect yourself and others.
- 6.3.7.2. Don PPE for Bloodborne Pathogen protection.
- 6.3.7.3. Do not move the victim unless it is necessary.
- 6.3.7.4. Keep the victim(s) in the position best suited to the type of injury.
- 6.3.7.5. Do not allow the victim to walk around.
- 6.3.7.6. Protect victims from unnecessary movement and disturbances.
- 6.3.7.7. Provide a blanket, clothing, or covers to keep the victim warm and comfortable.
- 6.3.7.8. Continue to monitor the victim(s) until emergency assistance takes over.

6.4. Hazardous Materials

- 6.4.1. In case of rendering assistance to personnel exposed to hazardous materials, consult the Safety Data Sheet (SDS), and wear appropriate personal protective equipment. Attempt first aid only if trained and qualified.
- 6.4.2. When a large chemical spill has occurred:
 - 6.4.2.1. Immediately notify the designated official and emergency team leader.
 - 6.4.2.2. Contain the spill with available equipment (e.g., pads, booms, absorbent powder, etc.).
 - 6.4.2.3. Secure the area and alert other site personnel.
 - 6.4.2.4. Do not attempt to clean the spill unless trained to do so.
 - 6.4.2.5. Attend to injured personnel and call the medical emergency number, if required.
 - 6.4.2.6. Call a local spill cleanup company or fire department (if arrangement has been made).
 - 6.4.2.7. Evacuate the building, as necessary.
- 6.4.3. When a small chemical spill has occurred:
 - 6.4.3.1. Notify the emergency team leader and/or supervisor.
 - 6.4.3.2. If toxic fumes are present, secure the area (with caution tapes or cones) to prevent other personnel from entering.
 - 6.4.3.3. Deal with the spill in accordance with the instructions described in the SDS.
 - 6.4.3.4. Small spills must be handled in a safe manner, while wearing the proper PPE.
 - 6.4.3.5. Review the general spill cleanup procedures.

6.5. Adverse Weather

- 6.5.1. Hazardous conditions that are created by adverse weather contribute to many accidents. Communication and involvement with superiors are the most vital part of the Emergency Action Plan. Utilization of the chain of command is required if there is a safety concern or conflict on anyone's part regarding whether to work or not. Employees must confer with their immediate supervisor.

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- 6.5.2. Continual monitoring of work-site conditions created by adverse weather is paramount. There are numerous potential hazards that can be caused by high winds, ice, or snow, extreme cold or heat, lightning, and rain. Consideration should always be given to the type of work that is to be performed.
- 6.5.3. Customers have the right to shut down any operation on their property in the event of adverse weather. However, pressure from customers to proceed with work during adverse weather where a Company employee deems unsafe, the immediate supervisor must be contacted for guidance. Every employee has the right and duty to refuse to work if hazards exist that cannot be reasonably safeguarded to achieve incident free operations.
- 6.5.4. Drivers of Company vehicles should always contact the office for guidance before attempting to drive in adverse weather such as icy conditions, slippery conditions, heavy fog, and blizzard conditions. Each operating area should communicate weather forecast and conditions to their employees as deemed necessary. If an employee encounters adverse weather while driving, pull off the roadway to a safe location and contact his/her immediate supervisor. If an emergency travel only or a road closure advisory has been issued, contact the immediate supervisor prior to travel.
- 6.5.5. Tornado
 - 6.5.5.1. If a tornado warning is broadcast, a distinct warning signal should be sounded, and everyone should move to shelter in the strongest part of the building. Shelters may include basements or interior rooms with reinforced masonry construction. The sheltering signal will be sounded during planned drills, so employees are familiar with the sound.
 - 6.5.5.2. Evacuation team leaders will evaluate potential shelters and conduct drills to ensure whether shelter space can hold all employees. Since there may be little time to shelter when a tornado is approaching, early warning is important. If there is a severe thunderstorm, news sources should be monitored in case a tornado warning is broadcast. Shelter should be sought with the following in consideration:
 - 6.5.5.2.1. Small interior rooms on the lowest floor and without windows.
 - 6.5.5.2.2. Hallways on the lowest floor away from doors and windows, and
 - 6.5.5.2.3. Rooms constructed with reinforced concrete, brick, or block with no windows.
 - 6.5.5.2.4. Stay away from outside walls and windows.
 - 6.5.5.2.5. Use arms to protect your head and neck.
 - 6.5.5.3. Remain sheltered until the tornado threat is announced to be over.
- 6.5.6. Earthquake

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- 6.5.6.1. Stay calm and await instructions from the emergency team leader or the designated official.
- 6.5.6.2. Keep away from overhead fixtures, windows, filing cabinets, and electrical power.
- 6.5.6.3. Assist people with disabilities in finding a safe place.
- 6.5.6.4. Evacuate as instructed by the emergency team leader and/or the designated official.
- 6.5.7. Flood
 - 6.5.7.1. If indoors, be ready to evacuate as directed and follow the primary or secondary evacuation routes.
 - 6.5.7.2. If outdoors, climb to high ground and stay there. Avoid walking or driving through flood water. If the car stalls, abandon it immediately and climb to higher ground.
- 6.5.8. Hurricane
 - 6.5.8.1. The nature of a hurricane provides for more warning than other natural and weather disasters. A hurricane watch issued when a hurricane becomes a threat to a coastal area. A hurricane warning is issued when hurricane winds of 74 mph or higher, or a combination of dangerously high water and rough seas, are expected in the area within 24 hours.
 - 6.5.8.2. Once a hurricane watch has been issued:
 - 6.5.8.2.1. Be ready to evacuate as directed by the emergency team leader and/or the designated official.
 - 6.5.8.2.2. Leave areas that might be affected by storm tide or stream flooding.
 - 6.5.8.3. During a hurricane:
 - 6.5.8.3.1. Remain indoors and consider the following.
 - 6.5.8.3.2. Small interior rooms on the lowest floor and without windows
 - 6.5.8.3.3. Hallways on the lowest floor away from doors and windows, and
 - 6.5.8.3.4. Rooms constructed with reinforced concrete, brick, or block with no windows.
- 6.5.9. Blizzard
 - 6.5.9.1. If indoors, stay calm and await instructions from the emergency team leader or the designated official.
 - 6.5.9.2. Stay indoors.
 - 6.5.9.3. If there is no heat, close off unneeded rooms or areas, stuff towels or rags in cracks under doors and cover windows at night.

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- 6.5.9.4. Eat and drink. Food provides the body with energy and heat. Fluids prevent dehydration.
 - 6.5.9.5. Wear layers of loose-fitting, lightweight, warm clothing, if available. If outdoors, climb to high ground and stay there.
 - 6.5.9.6. If outdoors find a dry shelter. Cover all exposed parts of the body.
 - 6.5.9.7. If shelter is not available, prepare a lean-to, wind break, or snow cave for protection from the wind.
 - 6.5.9.8. Build a fire for heat and to attract attention. Place rocks around the fire to absorb and reflect heat.
 - 6.5.9.9. Do not eat snow. It will lower your body temperature. Melt it first.
 - 6.5.9.10. If stranded in a car, stay in the vehicle.
 - 6.5.9.11. Run the motor about ten minutes each hour. Open the windows a little for fresh air to avoid carbon monoxide poisoning. Make sure the exhaust pipe is not blocked.
 - 6.5.9.12. Make yourself visible to rescuers.
 - 6.5.9.13. Turn on the dome light at night when running the engine.
 - 6.5.9.14. Tie a colored cloth to your antenna or door.
 - 6.5.9.15. Raise the hood after the snow stops falling.
 - 6.5.9.16. Exercise to keep blood circulating and to keep warm.
- 6.6. Extended Power Loss
- 6.6.1. In the event of extended power loss to a facility certain precautionary measure should be taken depending on the geographical location and environment of the facility.
 - 6.6.1.1. Unnecessary electrical equipment and appliances should be turned off if power restoration would surge causing damage to electronics and affecting sensitive equipment.
 - 6.6.1.2. Facilities with freezing temperatures should turn off and drain the following lines in the event of a long-term power loss: fire sprinkler system, standpipes, potable water lines and toilets.
 - 6.6.1.3. Add propylene-glycol to drains to prevent traps from freezing.
 - 6.6.1.4. Equipment that contains fluids that may freeze due to long term exposure to freezing temperatures should be moved to heated areas, drained of liquids, or provided with auxiliary heat sources.
 - 6.6.1.5. Electronic equipment should be brought up to ambient temperatures before energizing to prevent condensate from forming on circuitry.

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6.6.1.6. Fire and potable water piping should be checked for leaks from freeze damage after the heat has been restored to the facility and water turned back on.

6.7. Bomb Threat

6.7.1. If a bomb threat is called or reported, remain calm and courteous to the caller. Listen and do not interrupt the caller. If caller seems agreeable to further conversation, ask questions like:

6.7.1.1. When will it go off? Certain Hour? Time Remaining?

6.7.1.2. Where is it located? Building? Area?

6.7.1.3. What kind of bomb?

6.7.1.4. What kind of package?

6.7.1.5. How do you know so much about the bomb?

6.7.1.6. What is your name and address?

6.7.2. If building is occupied, inform caller that detonation could cause injury or death.

6.7.3. Activate malicious call trace: Hang up phone and do not answer another line. Choose the same line and dial *57 (if your phone system has this capability). Listen for the confirmation announcement and hang up.

6.7.4. Use Appendix 10.3- Telephone Bomb Threat Checklist to document the event.

6.8. Critical Operations

6.8.1. During some emergency situations, it will be necessary for some specially assigned personnel to remain at the work areas to perform critical operations.

6.8.2. Personnel involved in critical operations may remain on the site upon the permission of the site designated official or emergency team leader.

6.8.3. In case of an emergency, the Company will not permit any of the personnel to remain at the facility, the designated official or other assigned personnel shall notify the appropriate offices to initiate backups.

6.8.4. The names or job title of every employee who may be contacted by employees needing more information about the plan, shall be provided. A list of points of contact should be developed and available to employees.

7. Training

7.1. Employees will be trained to ensure safe and orderly emergency evacuation. Emergency Action Plan training shall occur initially upon hire, annually thereafter and when employees' responsibilities under the plan change and as needed as the plan changes.

8. Recordkeeping

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- 8.1. Emergency contact roles names and phone numbers along with local emergency phone numbers will be maintained by emergency team leaders and distributed to all employees.

9. Reference

- 9.1. OSHA 29 CFR 1910.38

10. Appendix

- 10.1. Company Emergency Personnel Names and Phone Numbers
- 10.2. Emergency Phone Numbers
- 10.3. Telephone Bomb Threat Checklist

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APPENDIX 10.1 COMPANY EMERGENCY PERSONNEL AND PHONE NUMBERS

Designated Responsible Official (Highest Ranking Manager)	
Location	
Name	
Phone	

Emergency Team Leader	
Location	
Name	
Phone	

Area/Floor Monitors	
Area/Floor	
Name	
Phone	

Assistant to Physically Challenged (if applicable)	
Location	
Name	
Phone	

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APPENDIX 10.2 EMERGENCY PHONE NUMBERS

Local Emergency Services	
	911
Fire Department	
Paramedics	
Ambulance	
Police	
Security (if applicable)	
Building Manager (if applicable)	
Spill Cleanup Company	

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APPENDIX 10.3 TELEPHONE BOMB THREAT CHECKLIST

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BOMB THREAT CALL PROCEDURES

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 (reverse side) immediately. Write down as much detail as you can remember. Try to get exact words.
7. Immediately upon termination of the call, do not hang up, but from a different phone, contact FPS 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 email:

- Call _____
- Do not delete the message.

Signs of a suspicious package:

- No return address
- Excessive postage
- Stains
- Strange odor
- Strange sounds
- Unexpected delivery
- Poorly handwritten
- Misspelled words
- Incorrect titles
- Foreign postage
- Restrictive notes

DO NOT:

- Use two-way radios or cellular phone; radio signals have the potential to detonate a bomb.
- Evacuate the building until police arrive and evaluate the threat.
- Activate the fire alarm.
- Touch or move a suspicious package.

WHO TO CONTACT (select one)

- Follow your local guidelines
- Federal Protective Service (FPS) Police
1-877-4-FPS-411 (1-877-437-7411)
- 911

BOMB THREAT CHECKLIST

Date: Time:

Time Caller Hung Up: Phone Number Where Call Received:

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 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 and level of noise) _____
- Estimated age: _____
- Is voice familiar? If so, who does it sound like? _____
- Other points: _____

Caller's Voice	Background Sounds:	Threat Language:
<input type="checkbox"/> Accent	<input type="checkbox"/> Animal Noises	<input type="checkbox"/> Incoherent
<input type="checkbox"/> Angry	<input type="checkbox"/> House Noises	<input type="checkbox"/> Message read
<input type="checkbox"/> Calm	<input type="checkbox"/> Kitchen Noises	<input type="checkbox"/> Taped
<input type="checkbox"/> Clearing throat	<input type="checkbox"/> Street Noises	<input type="checkbox"/> Irrational
<input type="checkbox"/> Coughing	<input type="checkbox"/> Booth	<input type="checkbox"/> Profane
<input type="checkbox"/> Cracking voice	<input type="checkbox"/> PA system	<input type="checkbox"/> Well-spoken
<input type="checkbox"/> Crying	<input type="checkbox"/> Conversation	
<input type="checkbox"/> Deep	<input type="checkbox"/> Music	
<input type="checkbox"/> Deep breathing	<input type="checkbox"/> Motor	
<input type="checkbox"/> Disguised	<input type="checkbox"/> Clear	
<input type="checkbox"/> Distinct	<input type="checkbox"/> Static	_____
<input type="checkbox"/> Excited	<input type="checkbox"/> Office machinery	_____
<input type="checkbox"/> Female	<input type="checkbox"/> Factory machinery	_____
<input type="checkbox"/> Laughter	<input type="checkbox"/> Local	
<input type="checkbox"/> Lisp	<input type="checkbox"/> Long distance	_____
<input type="checkbox"/> Loud		
<input type="checkbox"/> Male		
<input type="checkbox"/> Nasal		
<input type="checkbox"/> Normal		
<input type="checkbox"/> Ragged		
<input type="checkbox"/> Rapid		
<input type="checkbox"/> Raspy		
<input type="checkbox"/> Slow		
<input type="checkbox"/> Slurred		
<input type="checkbox"/> Soft		
<input type="checkbox"/> Stutter		

Other Information: _____



Homeland Security