

## Emergency Power Plan (EPP)

Addendum to Healthcare Facility Comprehensive Emergency Management Plan (CEMP)  
 Reference Emergency Rule 58AER 17-1 (Assisted Living) or 59AER 17-1 (Nursing Home)

### I. INTRODUCTION

Community Name	Brookdale Spring Hill		
Community Address	10440 Palmgren Ln		
Community City	Spring Hill		
Community State	FL		
Community ZIP Code	34606		
Community Phone	(352) 684-7400		
Community Fax	(352) 684-7450		
Facility Type	Assisted Living		
License Number	9255		
Community Contact Name	David Souza		
Community Contact Position	Executive Director	Distribution of Emergency Power Plan:	
Community Contact Email	dsouza@brookdale.com	Department of Elder Affairs	<a href="mailto:alfemp@elderaffairs.org">alfemp@elderaffairs.org</a>
Community Contact Cell	(352) 263-1053	County Representative	Kevin Ford
County	Henando		<a href="mailto:kford@hernandocounty.us">kford@hernandocounty.us</a>

On October 13, 2017, a Petition for Emergency Variance was filed on behalf of this community with the Department of Elder Affairs (please see attached). The Petition outlined our request to extend certain timeframes in order for the community to sufficiently comply with the Governor’s Emergency Rule.

Brookdale contracted with EXP Engineering to assess and recommend options for the community to comply with the Emergency Rule. Attached is a certification letter from EXP Engineering that outlines their plans for the specification, acquisition and installation of generators and fuel options, as applicable.

EXP Engineering is an international engineering firm that specializes in the specification and engineering of standby emergency generators for healthcare facilities. They have significant presence within the state of Florida and are familiar with the Florida requirements.

This Emergency Power Plan is considered PRELIMINARY and contains as much detail as is currently available. We will supplement and submit any additional information or changes as needed.

### II. COOLING AREAS

1. Does / Will the generator control temperature in the entire Facility? If not, what areas do you plan to keep at or below 80 degrees?  
 The generator will control temperature in the entire community.
2. What kind of equipment is being used to cool the facility (HVAC, portable A/C, window A/C unit)?  
 Existing Community Systems
3. What is the square footage of the cooled area (may include floor plan of area)?  
 22,880
4. How many people (residents and staff) do you plan to locate within the communities' designated cooled spaces/areas?  
 53
5. Please provide a statement for how you plan to move residents to this location.  
 Community associates will provide normal assistance to residents as needed to ambulate to and within the communities' temperature controlled areas.
6. Identify if beds will be located in the area to be cooled.  
 Yes
  - a. How many?  
 Residents will be in their normal beds. If additional beds are needed for staff, Brookdale maintains regional storage centers across Florida that includes beds for deployment by Brookdale associates to communities that need them.
  - b. Do you have these beds onsite?  
 See 6.a. above.
  - c. If you do not have a sufficient number of beds, what are you using or do you have a contract to obtain some?

If supplemental beds are needed, a community's call to district and/or regional Brookdale associates results in same-day delivery of beds to meet the need.

7. Describe how staff will ensure the facility does not exceed 80 degrees and how often it will be monitored when under generator power.

Generator operations include power to HVAC systems in order to maintain a temperature no greater than 80 degrees Fahrenheit throughout the community. When the building is operating under generator power, an on-duty associate will be assigned to use a hand-held thermometer to take ambient temperature readings in throughout the community on an hourly basis.

### III. EMERGENCY POWER & FUEL

8. Describe make, model, and size of generator(s), and whether the generator(s) will be fixed or portable.

Manufacturers Name	TBD
Model Number	TBD
Serial Number	To be determined
KVA/KW	150 KW
Voltage	208
Phase	3 Phase - 4 Wire
Fixed or Portable	Fixed

- a. If your community is installing a fixed generator, attach a construction implementation timeline. Timeline to be determined.  
b. Describe the plan/procedure for initiating generator power.

Upon loss of the external power supply, the community generator Automatic Transfer Switch (ATS) transfers the power load to the generator, with no manual interface needed.

9. Describe where the generator(s) is/are/will be located at the facility.

To be determined.

- a. Document how the emergency generator, fuel supply and all equipment is / will be protected from wind-borne debris impact and flooding:

Replacement generators are being specified to be "level one" grade inclusive of exterior protective metals appropriate to the risk of wind-borne debris impact. Installation planning is assessing storm surge and other flooding potential in order to minimize this risk as much as practical through site selection and height of installation.

10. Describe the fuel type that will be needed to operate the generator. If natural gas, is there a switch to change to Diesel or Propane if desired or required?

Natural Gas

11. How do you plan on storing 96 hours of fuel on-site?

- a. Existing or intended Fuel Tank Capacity (if applicable) Not required with Natural Gas Generator  
b. Estimated running hours at 75% of generator capacity (longer than at 100% capacity)  
c. Estimated running hours at 100% of generator capacity

12. Describe what emergency features the generator(s) is/are capable of powering (lights, fridge, A/C unit, etc.).

As a part of the generator coverage identified in section II. 1 above, the generator will provide power for HVAC systems, life safety systems, fire detection and alarm systems, at least one elevator as applicable, fire pumps, ventilation and smoke removal systems, key dining equipment and communication systems.

13. Please provide a maintenance schedule for both the generator and HVAC system. Include mechanism for load testing and documentation of the test.

The community will use a certified Generator Service Contractor to provide regular preventative maintenance, pre-determined inspections and an annual generator load test. Documentation of this service will be maintained within our preventative maintenance program where it will be available for review.

Community maintenance personnel will perform preventative HVAC maintenance including but not limited to filter changes, belt inspection/changes, and condensate cleaning. Additional routine maintenance and repairs will be performed by a Certified HVAC contractor. Documentation associated with contracted maintenance will be maintained within our preventative maintenance program where it will be available for review.

14. State the procedure of how your facility will refuel before and after an emergency.

Since the generator fuel type is Natural Gas, refueling is not required.

### IV. TRAINING

15. Provide a training procedure to ensure staff awareness of how to operate the emergency power to the community.

During routine community visits, Brookdale regional asset managers will train appropriate front-line associates and community management on proper operation of emergency power and associated systems. This will include a review of areas and equipment that will be covered by emergency power, how to inspect and ensure that designated equipment is running and that fuel supplies are appropriate, and will include a review of contacts for any concerns.

16. Describe how new staff will be informed of the Emergency Power Plan (EPP).

Between routine visits by Brookdale regional asset managers, community managers will review Emergency Power Plan procedures with new staff as a part of their on-boarding.

#### V. DOCUMENTATION

17. Please attach a certified HVAC letter with a quote approving the tonnage required to cool the space indicated.

An attached certified letter indicates progress to date by EXP Engineering. Their not-yet-completed finalized studies will guide final generator configuration decisions.

18. Please attach a certified letter from the electrician with a quote specifying the generator capacity required to run HVAC system and fuel for 96 hours. (Need electrical engineer to inspect and approve this power source plan for operating to avoid back feeding and creating danger to their residents, employees and linemen.)

EXP Engineering studies are not yet completed.

19. Please attach a construction implementation timeline for the generator and/or fuel tank where appropriate.

This will be provided upon completion of EXP Engineering recommendations and upon confirmation from equipment manufacturers of their estimated delivery and installation times. This time-line will incorporate any local permit requirements.


20. Please provide documentation to show the generator and fuel storage for the facility has been installed and is operable.

Local and state officials will be notified as soon as the upgrade in the communities' emergency power has been installed and is operable.

21. Your Emergency Power Plan (EPP) must contain the following written statement: "Under penalties of perjury, I declare that I have read the foregoing Emergency Power Plan and that the facts stated in it are true."

Person Completing This EPP	Roger S. Thiele, representing Brookdale Senior Living
Contact Title	Vice President, Administration
Contact Phone	615-564-8199
Contact Email	rthiele@brookdale.com

Under penalties of perjury, I declare that I have read the foregoing Emergency Power Plan and that the facts stated in it are true.

Contact Signature 

Date Signed 10/31/2017

PETITION FOR EMERGENCY VARIANCE  
DEPARTMENT OF ELDER AFFAIRS

In Re: Brookdale Senior Living Communities Inc. d/b/a Brookdale Spring Hill

1. Brookdale Spring Hill

10440 Palmgren Lane  
Spring Hill, Florida 34608-7486  
License #AL9255  
Hernando County  
(p) (352) 684-7400  
(f) (352) 684-7450

2. Pursuant to Florida Statutes Section 120.542, Brookdale Spring Hill requests a variance from the Procedures Regarding Emergency Environmental Control for Assisted Living Facilities, Rule 58AER17-1, enacted on September 16, 2017, which requires licensees of assisted living facilities to develop and implement a detailed written plan for the acquisition of generators and sufficient fuel that will maintain ambient temperatures at or below 80 degrees for a minimum of 96 hours in the event of a power loss. Specifically, the emergency rule states:

58AER17-1 Procedures Regarding Emergency Environmental Control for Assisted Living Facilities

(1) Assisted living facilities shall, within forty-five (45) days of the effective date of this emergency rule provide, in writing, to the Department of Elder Affairs at ALFEMP@elderaffairs.org and to the local emergency management agency for review and approval, a detailed plan which includes the following criteria:

(a) The acquisition of a sufficient generator or sufficient generators to ensure that current licensees of assisted living facilities will be equipped to ensure ambient temperatures will be maintained at or below 80 degrees Fahrenheit for a minimum of ninety-six (96) hours in the event of the loss of electrical power.

(b) The acquisition and safe maintenance of sufficient fuel to ensure that in the event of the loss of electrical power the generators will maintain ambient temperatures at or below 80 degrees Fahrenheit for a minimum of ninety-six (96) hours after the loss of electrical power.

(c) The acquisition of services necessary to install, maintain, and test the equipment and its functions to ensure the safe and sufficient operation of the generator system installed in the assisted living facility.

(2) Each assisted living facility shall, within sixty (60) days of the effective date of this rule, have implemented the plan required under this rule.

(3) If the facility's initial submission of the plan is denied, then the local emergency management agency shall report the denial to the Florida Division of Emergency Management and the facility within forty-eight (48) hours of the date of the denial.

- (4) Within ten (10) business days of the date of the local county emergency management agency's notice of denial, the facility shall resubmit their plan.
- (5) The county shall post all approved facility emergency management plans to their website within ten (10) days of the plan's approval.
- (6) Within forty-eight (48) hours of the approval of the plan from local emergency management agency, the facility shall submit in writing proof of approval to the Agency for Health Care Administration and the Department of Elder Affairs.
- (7) The State Fire Marshall shall conduct inspections to ensure compliance with this rule within fifteen (15) days of installation.
- (8) Each assisted living facility shall develop and implement written policies and procedures to ensure that the facility can effectively and immediately activate, operate and maintain the generators and alternate fuel required for the operation of the generators.
- (9) The Agency for Health Care Administration may revoke the assisted living facility's license for failure to comply with this rule.
- (10) In addition to other remedies provided by law, violation of this rule shall result in a fine or sanction as provided in Section 429.19, F.S. of \$1,000 per day.

3. Brookdale Spring Hill requests a temporary variance until the date listed in #5 below to allow sufficient time to comply with Rule 58AER17-1. The request is for an emergency variance under 28-104.004 due to the short time for implementation and the potential disciplinary action of a fine of \$1,000 per day the community would face if the variance is not granted.

4. Brookdale Spring Hill has been working in preparation for implementation of the requirements of the emergency rule. Please see attached documentation as to the efforts to date to secure appropriate generators and fuel to comply with the rule. The attached timeline also explains in detail the steps required to secure, permit and install an appropriate generator at Brookdale Spring Hill. There are a variety of factors detailed, including analyzing current capacities and community needs, securing and receiving all necessary equipment, permitting, installation and inspection time frames, which will prevent the community from implementation by November 15, 2017.

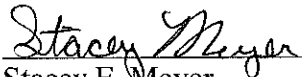
5. Brookdale Spring Hill is committed to compliance with the emergency rules enacted on September 16, 2017. However, the variance is being requested to allow Brookdale Spring Hill sufficient time to comply with the emergency rule. The factors detailed in #4 and attached are clearly outside the control of the community and will prevent Brookdale Spring Hill from meeting the required forty-five (45) day plan submission deadline of October 31, 2017 and the sixty (60) day implementation deadline of November 15, 2017. Brookdale Spring Hill therefore requests a variance to the requirement under 58AER17-1 for a time limited variance to meet the plan submission and implementation requirements. Brookdale Spring Hill plans to have a final plan submitted no later than December 15, 2017 and sufficient generator power and fuel installed by May 30, 2018. If additional factors arise preventing implementation by such date, we reserve the right to request an additional variance. Additionally, we request that DOEA withhold applying any disciplinary action during the time it takes DOEA to decide on the variance request and the additional time to comply as requested in the variance.

6. As a continuation of its efforts to comply with the emergency rule until complete implementation can be achieved and to maintain the safety and well-being of our residents, Brookdale Spring Hill will continue to follow its existing emergency plans in the event of disaster or loss of power. This may include but is not limited to utilizing temporary generators and/or evacuating residents from Brookdale Spring Hill if Brookdale Spring Hill cannot provide an adequate safe area with a temperature below 80 degrees Fahrenheit. Brookdale Spring Hill will continue to update emergency plans on file with the appropriate authority as necessary until in full compliance.

7. Brookdale Spring Hill will post a notice to all residents, responsible parties and visitors that it has filed for an Petition for Emergency Variance related to the emergency rule. Such notice shall be posted in the same manner and course as the community's survey results no later than October 16, 2017. Additionally, the administrator shall be available on an ongoing basis to answer any questions about the emergency rule or the variance petition.

8. Subject to the validity of the terms of the supplement 58AER17-2, Brookdale Spring Hill requests a variance from the deadline in 58AER17-2 2 that a variance granted may be for a period of no longer than 180 days. As detailed in #4 above, Brookdale Spring Hill has and continues to make all efforts towards complete compliance with the emergency rule. However, due to factors outside the control of the community, it will not be able to complete implementation until May 30, 2018.

Dated this 13<sup>th</sup> day of October, 2017.

  
Stacey E. Meyer MRM ON BEHALF OF

Assistant Secretary  
Brookdale Senior Living Communities Inc.  
6737 W. Washington Street, Suite 2300  
Milwaukee, WI 53214  
smeyer@brookdale.com  
(p) 414-918-5445  
(f) 414-918-6077

DEPARTMENT OF ELDER AFFAIRS APPROVAL

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Print Name

\_\_\_\_\_  
Title

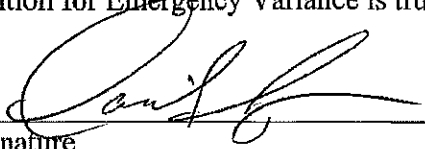
\_\_\_\_\_  
Date

ADMINISTRATOR AFFIDAVIT

STATE OF FLORIDA

COUNTY OF Hernando

I am submitting this Administrator Affidavit as the administrator of Brookdale Spring Hill, with the understanding that it will be relied upon by the Department of Elder Affairs. I hereby represent and affirm that, to the best of my knowledge, the information contained in the attached Petition for Emergency Variance is true and accurate.

  
\_\_\_\_\_  
Signature

David Souza  
\_\_\_\_\_  
Printed Name

Executive Director  
\_\_\_\_\_  
Title

10/12/2017  
\_\_\_\_\_  
Date



BU	Community Name	License Type Name	License Number	KW (existing)	KW recommending replacement	Peak usage	Estimated completion Date
04590	Brookdale Spring Hill	Assisted Living	9255	50	94	78	5/30/2018
	Start date	9/16/2017					

	Task	Description	Brookdale Expected Time	Brookdale estimated working days to complete (starting date 9/16/2016)
1	Sent internal Survey for community self assessment	Survey to each community Executive Director to send in existing Generator information	3	9/19/2017
2	Existing Community System Assessment	Need to understand basic information about current system, capacity, capabilities, etc.	7	9/26/2017
3	Electrical Engineer Assessment	Based on existing conditions, facility needs, regulations, and AHU requirements, Licensed Engineer assessment will outline Facility specific challenges, decisions, and budget options.	29	10/25/2017
4	Review & Approval of New System Concept	Review and understand system capabilities and capacities, and align with existing Emergency Disaster Response Plans. Approve for engineering and system design	14	11/8/2017
5	Engineering & Design of System	Licensed Engineer must prepare, review, stamp and submit complete plans for system installation.	28	12/6/2017
6	AHU Review & Approval	Multiple AHUs review/approval will be required. Facility improvements may also require additional approvals/permitting. Only applicable to Skilled Healthcare.	21	12/27/2017
7	Vendor Proposals	Contractor should prepare detailed plans and specifications for system, and system installation, including enclosures and required improvements to facility.	7	1/3/2018
8	Vendor Bid Process	Bid package for all equipment and installation services prepared and submitted to multiple installation contractors.	14	1/17/2018
9	Review & Approval of Bids	Select final scope of work and system based on informed, competitive bid process and responses.	7	1/24/2018
10	System Procurement	System lead times will vary by manufacturer	98	5/2/2018
11	Installation	Contractor installation per engineering specifications and local codes	14	5/16/2018
12	Final commission	Final inspection by Fire Marshall, AHJ, or Local municipality	14	5/30/2018

Comments:

Generac Power Systems, Inc.  
S45 W29290 Hwy. 59  
Waukesha, Wisconsin 53189

P (262) 544-4811  
F (262) 968-3791



October 6, 2017

Bryan Richardson  
Executive VP and Chief Administrative Officer  
Brookdale Senior Living Inc.  
111 Westwood Place  
Brentwood, TN 37027

Dear Bryan

Industrial Generators such as those that you have inquired about are non-stock products and would be custom built to your specifications. Due to the customized nature of Industrial Generators we typically would have a standard lead time of eight to twelve weeks (depending on models selected and standard configured options).

However, based on the local requirements the above stated lead time can typically extend an additional three weeks for unplanned or non-forecasted orders. Items that would drive the extended lead time are as follows:

- 96 hour run tank- This is double the typical expected run time from a fuel tank. To maintain the UL listing, the dimensions are quite different than a smaller capacity tank (primarily height for service). This can make sourcing a challenge if it exceeds our internal robotic capacity to fabricate.
- Florida Fuel Tanks - These tanks are unique to the Florida market and therefore not readily available by all tank manufacturers. In addition, there is lead time associated with getting the Florida specified Franklin Fueling Systems TLP-ULS liquid sensor
- Spikes in orders- Unusual seasonally high volume order levels would impact lead time for base generators as well as options such as Florida fuel tanks

Based on the above information, it is reasonable to expect with a good plan and advanced notification a large fleet order of generators could begin shipping in more significant volume in eleven to fifteen weeks from date of order (always subject to available slots and factory order acceptance)

Although this does not meet the proposed localized storage requirement, we can expedite and deliver the same sized Natural Gas Generators in much quicker fashion and would not have the same tank challenges that are faced with procuring a Florida rated 96 hour run time tank.

We will continue to support your efforts and will try and reduce lead time as much as possible.

Best Regards

A handwritten signature in black ink, appearing to read "Erik Wilde".

Erik Wilde  
Executive Vice President



October 25, 2017

Mr. Jonah Spaeth  
Director Procurement Category Management Procurement  
Brookdale Senior Living, Inc.  
6737 W. Washington Street, Suite 2300  
Milwaukee, Wisconsin 53214

Re: Brookdale Senior Living Facilities in Florida

Dear Mr. Spaeth;

This letter shall serve as official notice to authorities having jurisdiction (AHJ) within the State of Florida, that **exp** was contracted by Brookdale Senior Living Inc. as of 10/04/2017 to evaluate the existing emergency electrical systems and the existing cooling systems in all Brookdale Assisted Living Facilities (ALFs) and Skilled Nursing Facilities (SNFs) within the State of Florida. Prolonged power outages in ALF/SNF communities causes inconvenience and discomfort to both residents and staff, and can, in extreme hyperthermia conditions, be dangerous as well. The intent is to enable the facility to continue to care for residents during prolonged power outages of up to 96 hours, while maintaining those areas used to care for the residents during these times at a maximum temperature of 80°F, without reliance on external providers, such as contracts with generator or fueling companies to provide the requisite capabilities. This is in compliance with the mandate from Governor Rick Scott, as issued by the Agency for Healthcare Administration (AHCA) as Nursing Home Rule 59AER17-1 and Assisted Living Facility Rule 58AER17-1.

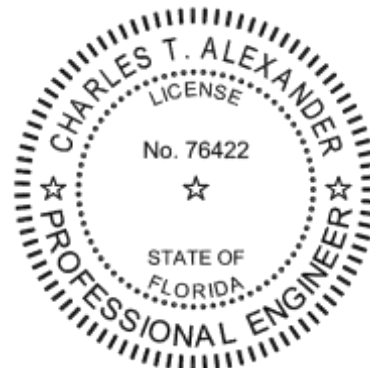
We are currently evaluating all Brookdale sites in Florida. Following evaluation, **exp** will provide the appropriate design documents and submissions to each AHJ for the use of permitting and construction approvals. **Exp** will provide, under the direction of a licensed professional engineer (PE), mechanical, electrical and plumbing designs that have been verified to provide the requisite cooling requirements and emergency systems. Working estimates of generator and fuel requirements are being provided to Brookdale for their use in preliminary Emergency Power Plan submissions.

If you, or any representative from either Brookdale Senior Living or an AHJ, have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Charles Alexander'.

Charles Alexander, PE  
FL PE-76422  
Charles.Alexander@exp.com



2601 Westhall Lane, Maitland, FL 32751, USA  
T: +1.407.660.0088 • www.exp.com