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REGION 6 LEPC Update

Steve Mason, EPA Region 6
mason.steve@epa.gov

Hilary Gafford, Weston Solutions
hiliary.gafford@westonsolutions.com

Steve & Hilary

EPA Reinstates TRI Reporting Requirements for H_2S

EPA is announcing that it is reinstating Toxic Release Inventory (TRI) reporting requirements for hydrogen sulfide. This action is part of Administrator Jackson's efforts to provide Americans with information on chemicals they may encounter in their daily lives.

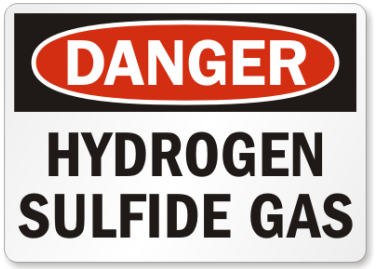
TRI is a public database containing information on chemical releases and waste management activities reported annually by certain industries and federal facilities.

(continued on page 2)

Region 6 LEPC Coordinators			
Arkansas	Kenny Harmon	501-683-6700	kenny.harmon@adem.arkansas.gov
Louisiana	Gene Dunegan	225-925-6113	gene.dunegan@dps.la.gov
New Mexico	Don Shainin	505-476-9628	don.shainin@state.nm.us
Oklahoma	Tom Bergman / Bonnie McKelvey	405-702-1013 / 405-521-2481	tom.bergman@deq.ok.gov bonnie.mckelvey@oem.ok.gov
Texas	Bernardine Zimmerman / Wade Parks	800-452-2791 / 512-424-5677	Bernardine.zimmerman@dshs.state.tx.us wade.parks@txdps.state.tx.us

The purpose of the action is to better inform the public about toxic chemical releases in their communities and to provide the government with information for research and the potential development of regulations. Hydrogen sulfide occurs naturally in crude petroleum, natural gas, volcanic gases, and hot springs. It can also result from the breakdown of organic matter, and is produced by human and animal wastes.

Hydrogen sulfide can also result from industrial activities, such as food processing, coke ovens, kraft paper mills, tanneries, and petroleum refineries. Individuals living near a wastewater treatment plant, a gas and oil drilling operation, a farm with manure storage or livestock confinement facilities, or a landfill may be exposed to higher levels of hydrogen sulfide.



Hydrogen sulfide was added to the TRI list of toxic chemicals in a final rule published on December 1, 1993. However, on August 22, 1994, EPA suspended the TRI reporting requirements for hydrogen sulfide in order to address issues that were raised by members of the regulated community regarding the information used to support the original listing decision.

On February 26, 2010, EPA published a Federal Register document that provided the public with the opportunity to comment on EPA's review of the currently available data on the human health and environmental effects of hydrogen sulfide. After consideration of public comments,

EPA has concluded that the reporting requirements for hydrogen sulfide should be reinstated. This action will be effective for the 2012 TRI reporting year. The first reports for the 2012 TRI reporting year are due from facilities by July 1, 2013. More information on TRI: http://www.epa.gov/tri

Chemical Suicide – Should you be concerned?

From EPA Region 8

Over 500 suicides have occurred using this method, and it is on the increase in the United States. Called chemical suicide or — depending on the chemicals used – detergent suicide; this trend is on the rise in the United States. Certain chemical mixes produce heat and a flammable, noxious gas that causes the subject to pass out and the heart stop within minutes.

Case in point: A young California man was found dead in his car behind a Pasadena shopping center. The young man's car windows to the car were rolled up and apparently locked. The temperature was about 100 degrees when officials arrived. There was allegedly a sign on the vehicle warning people of the potential danger.

The *Pasadena Independent* reported: A newer model white VW Beetle was sealed off from the public as it was believed to contain hazardous chemicals as well as a body of a young man in his 20's. Pasadena police (PPD) and fire officials staged at Halstead (just behind the Best Buy shopping Center).

HAZMAT teams from Glendale were quickly called in. Engine 37 established a staging area for incoming units and contacted PPD to gather more information. Battalion 3 arrived on scene and established Halstead command.

Upon further investigation and information gathered from PPD, it was determined that the Los Angeles County specialized HAZMAT would be needed.

In December 2008, Barlow County Georgia HAZMAT workers, in addition to other city and county emergency crews, responded to a call

where a man had apparently committed suicide using hazardous chemicals. Bartow County fire fighters, deputies and emergency medical workers responded to a call that a man was found by a park ranger sitting in a car and did not appear to be breathing.

In that car were two buckets containing a yellow substance and a note on the window that said, 'Caution,' and it had the chemical name on it," Bt. Chief David Levey said, adding that the substance was a mixture of chemicals including sulfuric acid.

A story in the *Denver Post* on 16 July 2011: Residents of one Chelsea Park Apartment building will not be able to return to their homes

until they can be decontaminated by a hazardous material team. Aurora received a call around 4 p.m. Friday about the use of hazardous material, Capt. Allen Robnet said. Aurora police are investigating the scene as a possible chemical suicide, Det. Bob Friel said.

When officials responded to the scene there was a note taped to a bathroom door saying hazardous materials had been used and to call 911. The building was evacuated and when the hazmat team entered the apartment, they found the body of a woman in the sealed bathroom, Robnett said.

The woman has not been identified and police will not remove her body until a decon crew clears the area. Police are investigating the toxic chemicals used at the scene. Residents of the building cannot return until the building is cleared. Thirty-six of 600 units in the complex were evacuated. The Red Cross is helping two families find a place to stay, said Chip Frye, a Red Cross Colorado public affairs volunteer. Officials do not have an estimated time of completion for the decontamination.

And again, On 2/20/2010, firefighters from the Clarksville, Indiana Fire Department responded on a reported unconscious / unresponsive victim at a local motel. This turned out to be a suicide by Hydrogen Sulfide.

The hydrogen sulfide was created by the combination of common household cleaning products. What was learned after the run was that this method of suicide has increased nationwide in the past several months.

The victim had sent letters to family members in advance of the suicide and had posted a hazmat warning sign on the motel room door.

There is an increasing awareness of these types of hazardous responses. The Firefighters Support Foundation has a new training program titled "Chemical Suicides," which is now available free to download. This program can be obtained in two formats: a 36-slide PowerPoint program, and a 23-minute video program.

First responders can view the video material with the PowerPoint file acting as their hard copy notes. Alternatively, they can use either resource independently. The program intends to accomplish the following:

- Explain the process of chemical suicide by mixing cheap and easily available chemicals in an enclosed space.
- Describe why it is a popular way of committing suicide and a growing threat to responders.
- Define the reasons why responders may be exposed to the lethal gases produced by the process.
- Educate responders about the warning signs that they may be approaching a chemical suicide.
- Suggest response tactics and guidelines.

The Colorado State Fire Chiefs association (CSFCA) has a very good site available on this topic which includes articles and safety bulletins available on this site: http://www.colofirechiefs.org/chemical_suicides.htm

Does this sound like a routine call that most would respond to and take similar action? It's Sunday morning 0730 hours, you respond to a person down in auto. You locate a car in the empty parking lot of a business. The engine and med unit pull up near the vehicle and personnel see a person inside that appears to be asleep or unconscious.

Wearing safety glasses and medical gloves, you walk up to the car and knock on the window. The patient does not respond to your knock on the window, and the doors are locked. What action will you take? Will you hurry to make patient access? Will you use a lockout tool, center punch, or halligan to make entry?

You make access, a rush of warm air comes out of the vehicle and you smell a sharp odor. You have just become a victim and have been exposed to a noxious and possibly fatal gas. What could you have done differently? You are the first-in unit. How should you respond to this type of incident? There are many calls that start out as a routine person down call. This type of incident can easily expand into a full blown Hazardous Materials Incident with a multijurisdictional response. Be aware of this new way to commit suicide and don't become a victim. Use common sense and stay safe.

On October 3rd this year, this article appeared in the *Seattle Times* by Sanjay Bhatt describing a chemical suicide that weekend:

> A hazardous materials team, bomb squad and other first-responders descended on the parking lot of a Bremerton church Sunday morning, where a man's body was found in a pickup along with a sign on the driver's window warning of an explosive, dangerous gas.
>
> Kitsap County Sheriff's Deputy Scott Wilson said the case appears to be a suicide similar to others across the nation from chemicals that release hydrogen sulfide -- a colorless gas that is toxic not only to suicide victims but to police officers, medics and anyone who gets close.

Chemical suicides are on the rise across the United States and have injured unsuspecting bystanders and police officers, according to the federal Centers for Disease Control and Prevention.

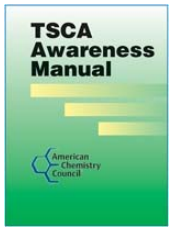
From 2006 to 2010, six states, including Washington, reported a total of 10 cases that killed nine people, injured four police officers, and required the decontamination of 32 people, according to the CDC.

While such cases are a tiny fraction of all suicides, chemical suicides – also called detergent suicides -- have the potential to kill firstresponders if they don't wear protective gear, says the CDC.

EPA Releases Formerly Confidential Chemical Information

As part of Administrator Jackson's commitment to enhance the US EPA's chemical management program and increase transparency, the agency is making available to the public hundreds of studies on chemicals that had been treated as confidential business information (CBI). The move is part of EPA's plan to make public the chemicals that are not entitled to CBI status. Releasing the data will expand the public's access to critical health and safety information on chemicals that are manufactured and processed in the US. Newly available information can be found using EPA's Chemical Data Access Tool.

"EPA is increasing the availability of health and safety studies on chemicals children and families are exposed to very day. We are making progress in making this information public and giving the American public easy access to it," said Steve Owens, EPA's Office of Chemical Safety and Pollution Prevention. "Over the next year, we expect to review several thousand additional studies on industrial chemicals and make many of these more accessible to the public." Since 2009, 577 formerly confidential chemical identities are no longer confidential and more than 1,000 health and safety studies are now accessible to the public that were previously unavailable or only available in limited circumstances.



In 2010, EPA issued new guidance outlining the agency's plans to deny confidentiality claims for chemical identities in health and safety studies under the Toxic Substances Control Act (TSCA) that are determined to not be entitled to CBI status. EPA has been reviewing CBI claims in new and existing TSCA filings containing health and safety studies.

Consistent with the guidance, the agency will request that the submitter voluntarily relinquish the CBI claims and make the newly available studies available to the public. EPA also challenged the chemical industry to make available information that was previously classified as CBI. To date, more than 35 companies have agreed to review previously submitted filings containing health and safety studies and determine if any CBI claims may no longer be necessary.

The newly available information can be found under a new "declassified tab" using the Chemical Data Access Tool, launched in December 2010 to assist the public in retrieving chemical health and safety information submitted to EPA under TSCA.

For additional information, go to http://www.epa.gov/oppt/existingchemicals/pubs/transparency.html.

MORE FREE and AMAZING TRANSCAER® training

Mark your calendars … MORE FREE and AMAZING TRANSCAER® training is coming to Fort Worth in May 2012. The training focus for these two day-long trainings will be Chlorine, Hydrochloric Acid, Sodium Hypochlorite, Sodium Hydroxide, Railroad Safety/Emergency Response and more.

May 9, 2012 – Fort Worth
May 10, 2012 – Fort Worth
Starts At: 9:00:00 AM Ends At: 5:00:00 PM

Union Pacific Rail Yard, 1600 Rogers Road, Fort Worth, Texas 76107
FREE One-Day Training includes:

- Hands-on and Classroom activities
- Topics Include: Chlorine, Hydrochloric Acid, Sodium Hypochlorite, Sodium Hydroxide, Railroad Safety/Emergency Response and more!
- Complimentary lunch
- Certificates upon completion

Contact Information -- The Chlorine Institute -- 703-894-4140 (phone)
Jordan May jmay@cl2.com 703-894-4124
Shane Fast sfast@cl2.com 703-894-4114

STATION A

- Chlorine Safety Presentation — An industry representative will review the primary mission chemical of the Chlorine Institute - chlorine. The team will cover chlorine properties, manufacturing, and transportation.

STATION B

- Chlorine Workshop — An industry team will provide hands-on training with chlorine tank car cylinders, ton containers and valves.

STATION C

- Caustic and Bleach — A team will provide product and shipment information along with response actions for caustic soda and caustic potash (sodium / potassium hydroxides) and sodium hypochlorite (bleach). An exhibit of the package and bulk transportation containers along with response equipment will give attendees an opportunity for hands-on training. The workshop will focus on hazards and identification, protective measures for emergency responders, emergency response equipment and methods.

STATION D

- Hydrochloric Acid — A team will provide detailed product information and shipment and response actions for transporting hydrochloric acid. This program will include an outdoor exhibit of the bulk transportation equipment used for product shipment. Attendees will have the opportunity for hands-on training experience with this equipment.

STATION E

- Emergency Kits A for 100-lb & 150-lb Chlorine Cylinders — CI CHLOREP ER Teams will provide instruction on chlorine cylinders in response to chlorine container leaks. Participants will get an opportunity to gain hands-on practical experience in the application of the emergency kit. Participants should bring their own hard hats, gloves, safety glasses, and steel-toed shoes.

STATION F

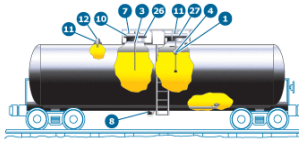
- Emergency Kit B for Ton Containers — CI CHLOREP ER Teams will provide instruction on ton containers, in response to chlorine container leaks. Participants will get an opportunity to gain hands-on practical experience in the application of the emergency kit.

STATION G

- Emergency Kit C & Midland Kit — CI CHLOREP ER Teams will provide instruction in the use of the chlorine Emergency Kit C and the Midland Kit and use in the response to chlorine tank car and cargo tank valve leaks. Participants will get an opportunity to gain hands-on practical experience in the application of the Emergency Kit C.

STATION H

- Railroad Safety, Security, and Emergency Response — Attendees will be provided with a basic knowledge of the requirements for safe transportation of hazardous materials by rail, and gain hands-on experience with the tank car fittings. There will be a session detailing the elements of how emergency responders can best cope with a rail emergency. Safety is the basis of the course beginning with communication with the railroad. What are and how to use the toll-free emergency telephone numbers; establish site safety; how to size up or assess the incident; what to expect and how to work with the railroad emergency response team. Basic elements of hazmat recognition are also emphasized.



Participants should bring their own hard hats, gloves, safety glasses, and steel-toed shoes

Global Tragedy Foreshadows Domestic Hazmat Needs

By Mary Rose Roberts (maryrose.roberts@penton.com)

Ed. Note: This article highlights one of our own – Bob Royall, one of the founders, and mainstay, of the HOTZONE Conference each year.

Fire departments' duties have changed dramatically since Robert Royall began his career at the Houston Fire Department in 1973. What started as a focus on firefighting has evolved into an all-hazards occupation. Now, instead of stomping out residential fires, Royal now oversees hazmat operations for the Harris County (Texas) Fire Marshal's office — which protects one of the busiest petrochemical ports in the world as well as 4 million residents.

Royall's hazmat career started early on when he was a member of Houston's Hazmat Response Team, one of the oldest in the nation after the Jacksonville (Fla.) Fire Department's.

In 1978, Houston's then-Fire Chief V.E. Rogers saw a presentation about Jacksonville's recently formed hazmat team and thought that if anyone needed such resources, it was Houston, because the city was the petrochemical capital of the world. Rogers tasked District Chief Max H. McRae to organize the team and develop the program.

In 1981, Royall was promoted and given command of a southeast fire station, which also included the industrial corridor of the Houston Ship Channel, part of the Port of Houston, where many energy and petrochemical companies were located. The department's move foreshadowed events that would show the need for hazmat teams.

In December 1984, a pesticide plant in the central Indian city of Bhopal leaked its contents and exposed hundreds of thousands of people to toxins. Estimates vary on the death toll, but a government affidavit in 2006 stated the leak caused 558,125 injuries including 38,478 temporary partial and approximately 3,900 severe and permanently disabling injuries.

"This incident brought to the forefront the need for an organized response to these specialized chemical events," Royall said. Nearly five years later — and right in Royall's own backyard — an explosion and fire occurred at the Phillips Petroleum Houston Complex, resulting in 23 known dead and one missing. In addition, more than 100 people were injured, and metal and concrete debris was found as far as six miles away following the explosion, the U.S. Fire Administration reported.

It was the first of several events that led to public support for the mitigation and response to incidents. And it wasn't chemical spills alone — the new threat of terrorism emphasized the need for a trained force. After the first bombing of the World Trade Center in 1992, followed by the Oklahoma City Bombing, and Tokyo sarin-gas attack, it was clear the fire service would need to respond to any chemical, biological, radiological and nuclear (CBRN) disasters, Royall said.

"It is the single most demanding responsibility that has been put on the fire service since EMS," he said.

Now, as hazmat chief for Harris County, Royall ensures the marshal's office can response to CBRN events, especially in the Port of Houston — home to 29 of the world's largest energy producers. The in-house Emergency Operations Branch is responsible for planning, mitigating and recovering from emergencies and disasters, whether natural, accidental or deliberate. The branch is staffed by hazmat technicians that support local fire and law enforcement in hazardous spills and releases, and perform safety inspections of facilities that store, sell or use hazardous materials. The team can respond to day-to-day events, in addition to the possibility of a nefarious act.

"They also assist in investigative efforts where hazardous materials and WMDs are involved," he said.

The team consists of 30 personnel, which includes full- and part-time employees as well as fire inspectors and investigators who are cross-trained and can be leveraged as force multiplies. The operating budget is around $2.2 million annually is allocated to run the team, which includes personnel and equipment costs.

Several pieces of equipment are used to respond to events, including a mobile hazmat response command post, dubbed Hazmat 1.

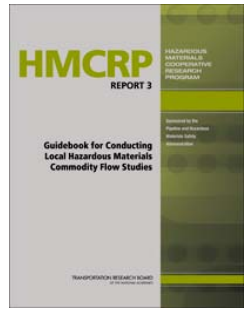
It holds the advanced detection technologies and identifications, Level A chemical response protective clothing and encrypted communications. As a complement, the marshal's office also has Hazmat 2, a tender used to deliver foam to industrial chemical incidents. They also have a hazmat response boat since they are located in upper Galveston Bay, Texas, Royall said.

While Royall is more than proud of Harris County's capabilities, it is only one of the many hats he and his personnel are asked to wear. For example, the office also operates the Harris County Fire Training Academy and fire investigations, such as arson.

"I am in a unique situation because I have arson plus WMD response technicians and I am able to use the law-enforcement part of my part of command for environmental crime issues," he said. "We are able to do a lot of things within one agency."

Guidebook for Conducting Local Hazardous Materials Commodity Flow Studies - Transportation Research Board & Texas A&M

NASTTPO and its members assisted in this project and they are acknowledged by the authors



Local and regional governments require information on the types, quantities, and locations of hazardous materials being transported through their jurisdictions to plan for effective and appropriate emergency response to incidents. Although the DOT provides a detailed handbook (*Guidance for Conducting Hazardous Materials Flow Surveys*, (January 1995) for local governments to use in conducting highway commodity flow studies, local planners often do not have access to reliable and comprehensive data on the flow of hazardous materials within their jurisdictions. By and large, existing data sources are too broad, covering flows at the national level and to a limited extent the state level. More detailed data involving all modes of transportation are required by local and regional governments when making decisions about hazardous materials training and emergency response preparedness.

The objective of this project is to produce an updated, user-friendly guidebook for conducting hazardous materials commodity flow surveys to support local risk assessment, emergency response preparedness, and resource allocation and to support analyses across jurisdictional boundaries. This guidebook should be targeted at transportation planning and operations staff at the local and regional levels, as well as local and regional personnel involved in hazardous materials training, and emergency response. All modes of transportation, all classes and divisions of hazardous materials, and the effects of seasonality on hazardous materials movements should be discussed.

The guidebook should explain data collection methodologies to obtain hazardous materials data at the local level (from public and private sources) and identify methods that can be used by local and regional planners to identify and estimate hazardous materials flows in their jurisdictions. The hazardous materials data obtained through the methods discussed in the guidebook must be transparent and clearly understood by both novice and advanced users.

The guidebook should explain how existing datasets can be used in isolation or can be combined with other datasets or statistical methods to estimate hazardous materials commodity flows at different levels of specificity. The guidebook produced as part of this project should include a resource guide to information related to hazardous materials commodity flows from existing local, state, and regional hazardous materials commodity flow surveys and related materials. In addition, the guidebook should propose a framework for developing and implementing a centralized directory/repository of local, state, and regional hazardous materials commodity flow surveys.

Status: Published as HMCRP Report 3. The Guide is also available electronically at

http://onlinepubs.trb.org/onlinepubs/hmcrp/hmcrp_rpt_003.pdf

The contractor's final report and appendices (unedited by TRB) are available electronically at

http://onlinepubs.trb.org/onlinepubs/hmcrp/docs/HM01_FR.pdf

CSB Report Finds Oil & Gas Exploration & Production Facilities Present Hazards to Members of Public, Especially Children

CSB Issues Recommendations to EPA, State Regulators, NFPA, and API Aimed at Increasing Oil Site Safety and Security

Hattiesburg, MS, (October 27, 2011) – The Chemical Safety Board (CSB) today released a new study of explosions at oil and gas production sites across the U.S., identifying 26 incidents since 1983 that killed 44 members of the public and injured 25 others under the age of 25, and is calling for new public protection measures at the sites.

The report examined in detail three explosions that occurred at oil and gas production facilities in Mississippi, Oklahoma, and Texas, that killed and injured members of the public between October 2009 and April 2010.

The CSB report found that children and young adults frequently socialize at oil sites in rural areas, unaware of the explosion hazards from storage tanks that contain flammable hydrocarbons like crude oil and natural gas condensate. The unintentional introduction of an ignition source (such as a match, lighter, cigarette, or static electricity) near tank hatches or vents can trigger an internal tank explosion, often launching the tank into the air and killing or injuring people nearby.

The report identified regulatory gaps at the federal and state levels and called on the EPA and state regulatory bodies to improve current safety and security measures at exploration and production sites such as warning signs, full fencing, locked gates, locks on tank hatches, and other physical barriers. The report also called on state regulators in Mississippi, Oklahoma, and Texas to require safer, modern tank designs that reduce the likelihood of an internal tank explosion if an ignition source is introduced nearby.

On October 31, 2009, two teenagers, aged 16 and 18, were killed when a storage tank containing natural gas condensate exploded at a rural gas production site in Carnes, Mississippi. Six months later a group of youths were exploring a similar tank site in Weleetka, Oklahoma, when an explosion and fire fatally injured one individual. Two weeks later, a 25-year-old man and a 24-year-old woman were on top of an oil tank in rural New London, Texas, when the tank exploded, killing the woman and seriously injuring the man. The CSB deployed investigators to all three sites to collect information on the incidents.

Investigators found that the three accidents occurred in isolated, rural wooded areas at production sites that were unfenced, did not have clear or legible warning signs and did not have hatch locks to prevent access to the flammable hydrocarbons inside the tanks.

CSB Chairman Rafael Moure-Eraso said, "After reviewing the work of our investigators I believe that these incidents were entirely preventable. Basic security measures and warning signs – as well as more safely designed storage tanks – will essentially prevent kids from being killed in tank explosions at these sites."

The CSB's investigation found few major cities and some states, such as California and Ohio, require varying levels of security for oil and gas production sites, such as fencing, locked or sealed tank hatches, and warning signs. As a result, California did not have any fatal tank explosions between 1983 and 2011. However, many other large oil and gas producing states have no such requirements. The major oil producing states Texas and Oklahoma require fencing and warning signs for certain sites that have toxic gas hazards but not for all sites with flammable storage tanks.

"Oil and gas storage sites are part of the landscape in many rural American communities; hundreds of thousands of similar sites are located across the country," said CSB Lead Investigator Vidisha Parasram. "It was increased security measures such as fencing, gates and signs, and a concern to discover that issues related to public safety are rarely considered prior to placement and design of these sites. In many cases sites can be as close as 150 to 300 feet from existing buildings such as residences, schools, and churches, and still lack any meaningful warnings or barriers to prevent public access."

The Board recommended that EPA issue a safety bulletin warning of the explosion hazards of storage tanks. Similarly, the CSB's recommendations seek to address the current gaps in regulations and codes in Mississippi, Oklahoma and Texas.

The CSB's investigation also examined industry codes and standards, such as those from the American Petroleum Institute (API) and the National Fire Protection Association (NFPA). The final report recommends that both organizations adequately address the hazards that these sites present to members of the public through amendments to their existing codes or creation of additional guidance.

As a result of the investigation's findings the CSB recommended that API warn of the explosion hazards presented by exploration and production sites, including requirements for security measures such as fencing gates and signs, recommendations for inherently safer storage tank design and acknowledgment of the public safety issue presented by these sites.

On April 13, 2011, the CSB held a news conference and public meeting in Hattiesburg to release the safety video "No Place to Hang Out: The Danger of Oil Well Sites." The video is aimed at educating people on the hazards associated with storage tanks. In the video the CSB interviewed teenagers and adults who stated that it is a common practice in rural areas for young people to hang out and socialize at oil production sites.

CAMEO Exercises

From Tom Bergman, ODEQ

There are a couple of new CAMEO exercises posted on the DEQ CAMEO webpage at http://www.deq.state.ok.us/LPDnew/saratitleiii/cameo.htm One exercise covers an example of using CAMEO Incidents and Routes modules for documenting a Tornado event; the exercise has you create a Tornado path in MARPLOT, create an associated Incident record in CAMEOfm, and then attach photos and damage assessments to the Incident record.

The 2nd exercise is a sheet on installing the new versions of ALOHA and CAMEO Chemicals, and what is different between the old versions of those and the new versions. CAMEO Chemicals now has some improved Search operations, and ALOHA has a new, easier method to display Threat Zones onto Google Earth.

Feel free to utilize the exercises any way you wish.

Risk Management Program Information

To interested parties –

As you know, EPA regulates certain hazardous chemical facilities under 40 CFR Part 68 - known as the EPA Chemical Accident Prevention or Risk Management Plan (RMP) program. EPA is aware that state and local communities are major stakeholders in the RMP program, and as such the Agency would like to alert you to a step we are taking to improve the efficiency of this program.

Current EPA plans call for the re-establishment of internet access to the non Off-site Consequence Analysis (OCA) sections of the RMP database beginning in July of 2012.

Under the Risk Management Plan program, hazardous chemical facilities must submit RMPs to EPA. The Agency maintains a national electronic database of RMPs, and that database currently includes plans from approximately 13,000 active RMP facilities.

EPA identifies two categories of information contained within or derived from RMPs:

- Off-site Consequence Analysis (OCA) information, which includes the portions of RMPs that describe a regulated facility's worst-case release scenario(s) and alternative (more likely) release scenarios, and also includes any statewide or national facility rankings developed by EPA which is derived from this information
- Non-OCA information, which includes the remaining portions of RMPs, including facility registration information, information about the history of serious accidental releases at the facility, information about the facility's accident prevention and emergency response programs, and an executive summary

Under the law, public access to OCA information is very limited. In August 1999, the President signed Public Law 106-40, the Chemical Safety Information, Site Security, and Fuels Regulatory Relief Act (CSISSFRRA). Among other things, CSISSFRRA responded to concerns over the sensitivity of OCA information by restricting public access to the information and requiring EPA and the Department of Justice (DOJ) to publish regulations establishing methods for public access to OCA information that would minimize the risk of its criminal use.

CSISSFRRA, and subsequent regulations enacting it (40 CFR Chapter IV), provide full OCA information access only to "covered persons" - including Federal, State, and local government officials, their agents or contractors, and other specified individuals with an official need for the information. CSISSFRRA prohibits covered persons from disclosing to the public OCA information, including statewide or national rankings derived from OCA information, except in certain circumstances.

The law and its implementing regulations do allow members of the public limited access to OCA information in designated Federal reading rooms, which are usually located in EPA Regional Offices or Department of Justice offices in each state. Additionally, owners of covered facilities may make their facility's OCA information available to the public, but are not required to do so.

On the other hand, there are no legal restrictions on the distribution of non-OCA RMP information. In late 1999, shortly after the RMP regulation went into effect, EPA made non-OCA RMP information available to the public via the Agency's Internet website. However, after the terrorist attacks of September 11, 2001, EPA made a voluntary decision to remove all RMP data from the Agency website. Since that time, members of the public desiring access to current non-OCA RMP information from EPA must either visit a Federal reading room, or send a Freedom of Information Act (FOIA) request to the Agency. As an Agency, we have received repeated FOIA requests for access to the non-OCA portions of RMPs that we are compelled to grant. Thus, the failure to have the non-OCA portions of the RMP database accessible through EPA's website has led to bureaucratic burden on the requesters and the Agency without any significant additional protection of the information.

EPA is now planning to once again make the non-OCA portion of the RMP national database available to the general public via the Agency's website. The Agency believes that restoring public access to this information may be very useful to members of the public and most significantly, will ease access to essential information for critically important public sector EPA partners such as police, fire fighters, medical emergency responders, emergency management planners, State Emergency Response Commissions (SERCs), and Local Emergency Planning Commissions (LEPCs).

For example, we believe that access to non-OCA RMP data via the EPA website will be useful to the FBI as it seeks to maximize the effects of outreach programs and to successfully engage potential partners in the national effort to combat terrorism; to DHS Chemical Security planners seeking to evaluate the scope and penetration of their programs, both voluntary and regulatory; to agencies evaluating risk analytic processes, critical infrastructure: in short, myriad partners in the national preparedness effort.

In such cases, the streamlined access afforded by a public access website should prove to be a major step forward in efficiency. We are especially confident that a simple access system will be very effective in restoring access to this type of information to our non-federal preparedness and response partners.

Please Note - Access to OCA information will continue to be restricted in accordance with CSISSFRRA and 40 CFR Chapter IV.

Current EPA plans call for Internet access to the non-OCA sections of the RMP database to be activated in July 2012. Prior to that time, we would like to obtain feedback from our stakeholders and address any questions or concerns that you may have. If you have any questions concerning EPA's decision or plans to make RMP non-OCA information available via the Internet, or would like more information, please contact EPA's Office of Emergency Management, at 202- 564-8600 or by email at Stanton.Larry@epa.gov, or to our Deputy Director, Dana Tulis, at dana.tulis@epa.gov

The Day I Didn't Quit

© 2010 Frederick J. Cowie, Ph.D. fredcowie@aol.com fredcowie.com 406-431-3531

Fifteen or so years ago, I distinctly remember saying, "That's it. I'm done. I quit." More than that, I distinctly remember I meant it. I wasn't being childish. I wasn't unduly influenced by a bad relationship at work. I wasn't exhausted, overloaded, or burnt out.

I was, however, sad, hopeless, and without the knowledge and skills to carry on. "I can't do this anymore!"

I wasn't alone. I didn't say that just to myself. I had just learned that a volunteer fire department which I had trained on hazmat awareness had just done the opposite of common sense safety stuff, the opposite of what I had said, the opposite of what the safety officer had said, and almost got their volunteers hurt or killed.

So, despairingly, I said it to the person who knew my approach to training the best.

Fortunately—wisely— my friend and co-trainer, a fire fighter, didn't try to talk me out of it, knowing that that approach would have been fruitless, for my mind, as scrambled as it was distraught, was made up.

"Let me tell you a story about me," he said. Now I realize that no memory is perfect, even good, but here is the story as I remember it today.

"I was a young fire fighter, ready to save the world. We rolled on a car wreck. When I got there I saw an injured young child. I tried to help, do the things I had learned. I tried to save the child, but I failed. I said what you said, 'That's it, I'm done, I quit, I can't do this again.'

My Chief pulled me aside and said. 'Son, when we try to help, sometimes we help people who were going to be okay even if we hadn't arrived. Sometimes the person we try to help dies, and they would have died had we showed up or not.

But sometimes, just sometimes, we help that person who would have died if we hadn't rolled. You can't save them all, but, son, you can save that one who would have died if you hadn't shown up. Now you can quit if you want, but don't do it just because you lost one."

On those days I want to quit because someone writes a negative comment on a course evaluation sheet or someone sends me a "Please remove me from your newsletter article e-mail list" e-mail message, I really do want to quit, but I don't, because as the Chief said, we just can't save the world, save them all.

All we can do is be there for the person, that one person, who truly needs our help. And today is another day I didn't quit!

HAS YOUR LEPC:

- Established a permanent address for facilities, the SERC, and EPA to mail required forms and information;
- Notified the SERC of any changes to the LEPC structure, especially a change in the chair or address;
- Provided EPCRA training to emergency responders, specifically local fire departments who often can provide information to facilities during fire inspections and police departments who respond to haz-mat incidents?
- Established a 24-hour manned emergency phone number (i.e., sheriff's office, 911, fire department) for facilities to make release notifications -- an answering machine is not sufficient

- The articles contained herein are provided for general purposes only.
- EPA does not accept responsibility for any errors or omissions or results of any actions based upon this information.
- Please consult the applicable regulations when determining compliance.
- Mention of trade names, products, or services does not convey, and should not be interpreted as conveying official EPA approval, endorsement, or recommendation.

Region 6 Emergency Notification Numbers

Arkansas Dept. of Emergency Management	800-322-4012
Louisiana State Police	877-925-6595
New Mexico State Police	505-827-9126
Oklahoma Dept. of Environmental Quality	800-522-0206
Texas Environmental Hotline	800-832-8224
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National Response Center	800-424-8802
EPA Region 6	866-372-7745
CHEMTREC	800-424-9300