



Steve Mason, EPA Region 6  
[mason.steve@epa.gov](mailto:mason.steve@epa.gov)

Hilary Gafford, Weston Solutions  
[hilary.gafford@westonsolutions.com](mailto:hilary.gafford@westonsolutions.com)

This month we discuss oil / petroleum product spills and the proper use of countermeasures in responding to such incidents.

Steve & Hilary

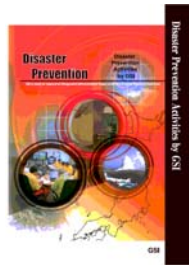
## DRAFT National Frameworks and the Recovery Interagency Operational Plan Available for Review



### FEMA

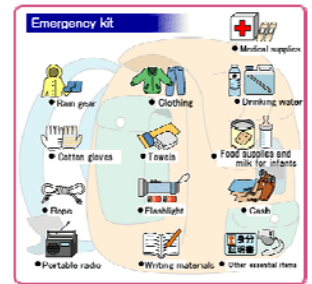
FEMA and its partner agencies are seeking input on a series of draft national planning frameworks related to incident Response, Prevention, Protection, and Mitigation. FEMA is updating the existing National Response Framework, and federal agencies have developed new national frameworks for Prevention, Protection, and Mitigation activities.

- The National Response Framework addresses how the "whole community" -- which includes all levels of government, individuals and communities, businesses, non-profits, and faith-based organizations -- work together to respond to "all-hazard" incidents.
- The National Prevention Framework addresses whole community roles and actions in the prevention of terrorism in our Nation.
- The National Protection Framework addresses whole community roles



and actions in protecting our Nation against natural disasters and man-made hazards, including terrorism.

- The National Mitigation Framework addresses whole community roles and actions in lessening the impact of disasters through mitigation.



In addition, FEMA issued a National Disaster Recovery Framework in September 2011. FEMA has just developed a draft Federal Recovery Interagency Operational Plan, which supports the Framework and provides additional details on Federal implementation of the Framework.

All of this work is being conducted under a presidential directive called Presidential Policy Directive-8. FEMA and its partner agencies have released these draft documents for a national public engagement period and is inviting national comment on these documents. You may download a copy of these documents and instructions for providing comments on them at the following FEMA website: <http://www.fema.gov/prepared/ppd8.shtm>

### Region 6 LEPC Coordinators

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

# Big Changes Coming to TCEQs Emergency Response Structure

New Disaster Response Strike Teams Will Be Based in Regions and Directed by Regions. (Natural Outlook, March 2012)



Mobile Command Post Trailer, and (inset) interior.

TCEQ photos

Big changes will be taking place in the TCEQ's emergency management structure shortly before this year's hurricane season starts up. But don't worry, said Kelly Cook, director of the Critical Infrastructure Division.

"We're ready right now in the event something happens that calls for a major emergency response," he said.

"But we are looking for efficiencies in our Strike Team concept, looking at applying lessons learned over the past few years, and looking to grow our current institutional knowledge and experience, while also providing succession planning.

"We want to make sure we have a robust system for large-scale disaster responses, based within the TCEQ's regional structure, that will automatically re-populate with qualified, trained team members as the more tenured staff move on or retire. We're looking at a system that can support multiple emergency

responses, as well as long-term responses, should that become necessary."



Response to Helotes mulch fire, 2006-2007. TCEQ photo

Although a final name for the new organization has not been decided upon, Cook said it will probably retain "Strike Team" as part of its name.

"The TCEQ Strike Team has earned a lot of respect over the years, from the public, from state agencies and local governments, and from federal organizations like the Coast Guard and EPA," he said. "The Strike Team name carries a lot of equity, built up through successful responses to

numerous emergencies over the years."

## A New, Region-Based System

Cook said that the new disaster response strike teams will be based in the regional offices, and will report to the regional directors and area directors. "It will be up to regional and area directors as to the exact makeup and size of their strike teams. However, we would expect the coastal areas and regions with larger populations to have bigger teams."



Response to Hurricane Ike, 2008. TCEQ photo

## Added Flexibility

By having the strike teams made up of regional staff, all necessary disciplines can be incorporated to respond to a particular event. For instance, in addition to including members trained in hazmat and Incident Command System, the teams will also incorporate experts in wastewater, public drinking water, waste and debris management, and other areas.

Another advantage of the new system is that instead of one team, there will now be a team in each of the TCEQ's 16 regions—or, in the case of some of our smaller regions, a combined team, Cook said. This way, the workload can be spread out when the emergencies last longer than a few days.

"For instance, imagine a heavy rainfall and flooding event in South Texas, an event that would go on for several weeks," Cook said. "After the first week or so, the Region 15 disaster response strike team can take a break, and another team—say, from Corpus Christi—can move into place and take over." The same flexibility would also allow the TCEQ to respond efficiently to more than one emergency at a time, he said.

And, said Cook, regions will always be able to borrow needed expertise from other teams.



Response to train derailment in Cameron, 2008. TCEQ photo

## New Organizational Structure

These regional teams will report to the regional directors, but Austin will still have a role in the emergency management system, Cook said. An emergency

management coordinator, reporting to the Critical Infrastructure Division, will be hired, and the coordinator will participate in the hiring of two emergency response liaisons. The coordinator and liaisons will have a crucial role in the system.

"The liaisons will work closely with all the teams, helping to make sure they receive the proper training and certifications, organizing and conducting drills, and providing support during actual disasters.

"They will move the disaster response equipment around the state when appropriate, and make sure that everyone is familiar with the instruments, and that the instruments are properly maintained and calibrated. And that includes additional analytical and monitoring equipment and communications gear, which may come in handy for day-to-day operations in the regions." Some resources, such as the Mobile Command Trailer, will be based primarily in Austin, but may also move around the state for training.



Response to Hurricane Katrina, 2005. TCEQ photo

Many changes in emergency management are already occurring at the state and federal levels and the liaisons will be responsible for making sure those changes are realized and incorporated within the regional teams.

## Outlook: Better Service

"This is a big change, but change is good, and by moving more of the responsibility and control to the regions, we will provide better service to the people of Texas during emergencies," Cook said. "And as we have seen in past emergencies, the TCEQ really has 2,700 emergency responders. Time and time again, the people of this agency have provided tireless service in time of need, and we know this will always be the case."

# Guidance on the Use of Chemical Countermeasures on Inland Oil Spills

## Introduction

The U.S. Environmental Protection Agency (USEPA) recognizes the major role of local government responders as the first line of defense for mitigating threats to public health and the environment from spills of oil and hazardous substances.

In recognition of this role, EPA tries to provide local responders with the tools necessary to safely and effectively mitigate such incidents. Chemical countermeasures are one of those tools, but their use must be authorized and carefully managed.

This fact sheet describes that process where countermeasures are proposed for use on inland events such as fuel spills that may affect navigable waters. These include any surface waters and conduits to them, including road ditches and storm drains.

## What are chemical countermeasures?



Any element, compound, or mixture that coagulates, disperses, dissolves, emulsifies, foams, neutralizes, precipitates, reduces, solubilizes, oxidizes, concentrates, congeals,

entraps, fixes, makes the oil more rigid or viscous, reduces the harmful effects or otherwise helps remove the oil from the environment.

This includes biological additives, dispersing agents, surface washing agents, surface collecting agents, burning agents and any other miscellaneous oil spill control agents.

## Which ones can be used?

For spills that have the potential to reach navigable waters, either directly or by runoff, the chemical

countermeasure must be listed on the Product Schedule at Subpart J of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP).

## When can they be used?

Free product should first be recovered and/or removed to the extent practical. Provisions must be made to contain and recover runoff from the treated area if there is a threat that it might reach navigable waters.

Approval is unlikely in situations where there are concerns with groundwater contamination (i.e., shallow aquifers, Karst geology) that might affect navigable waters. Caution must be used when applying chemical countermeasures into a closed conduit, such as a sanitary sewer or storm sewer.

Many countermeasures, particularly dispersants, break the fuel into small droplets and increase vaporization. In these cases, use only products specifically designed for vapor suppression.

## When is approval necessary?

Product Schedule listing does NOT imply or confer pre-approval for use. It means only that the agent has met the performance testing requirements set forth in the NCP. Authorization is required for use in EVERY case where navigable waters may be affected.



In cases where it is certain that no runoff can reach navigable waters, authorization is not required. An example of this might be treatment of a road surface to reduce slickness.

### Who can give approval?

The NCP at Subpart J requires authorization from the On-Scene Coordinator (OSC), with concurrence from the Regional Response Team (RRT) and other affected agencies.

In cases where use of chemical countermeasures is necessary to prevent or substantially reduce an immediate hazard to human life, the OSC may authorize use of the agent without RRT concurrence for the emergency phase of the operation.

### How do I request approval?

During a spill event, contact an OSC at the 24-hour EPA Region 6 Hotline number: 866.372.7745.

### What information is needed to consider approval?

- Exact location of spill
- Type and amount of material spilled
- Justification for countermeasure use
- Potential health/environment impacts
- Name of countermeasure proposed
- Product MSDS
- Rate and method of application
- Estimated volume proposed
- Nearest surface water
- Forecasted weather conditions
- Monitoring strategy
- Material recovery strategy

## WHO DECIDES WHAT PRODUCTS CAN BE USED DURING AN OIL SPILL RESPONSE?

Prepared by the National Response Team Response Committee

The first line of defense in cleaning up oil spills on surface waters consists of mechanical countermeasures such as booms and skimmers. However, when the limitations of mechanical measures are met and oil threatens the public welfare or the environment, other response techniques and technologies, such as chemical or biological countermeasures, including dispersants, may be considered.

The purpose of this factsheet is to inform all parties that may be involved in emergency response efforts of the requirements under the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) to obtain approval for the use of chemical and biological countermeasures in navigable waterways.

In most cases, the Federal On-Scene Coordinator (OSC) must first obtain concurrence of the incident-specific EPA representative to the Regional Response Team (RRT) and, as appropriate, the RRT

representatives from the state(s) with jurisdiction over the navigable waters threatened by the release or discharge, and as practicable, in consultation with the Department of Commerce and Department of the Interior, as natural resource trustees.

More specific details of the process for obtaining this approval, either before or during a response, are outlined below.

### What is the NCP Product Schedule?

Under the Clean Water Act, EPA is responsible for preparing a schedule of chemicals, and other substances, including dispersants that may be used to remove or control oil discharges. Subpart J (40 CFR 300.910) of the NCP governs the use of chemical and biological agents that may be listed on this schedule. EPA prepares and maintains this schedule, known as the NCP Product Schedule. Vendors, response personnel, other federal agencies, state



agencies, and the public can request and use NCP Product Schedule information.

Area	Agency	Product	Approval	Approval	Approval	Approval	Approval
AL	AL001	AL001	AL001	AL001	AL001	AL001	AL001
AK	AK001	AK001	AK001	AK001	AK001	AK001	AK001
AR	AR001	AR001	AR001	AR001	AR001	AR001	AR001
CA	CA001	CA001	CA001	CA001	CA001	CA001	CA001
CO	CO001	CO001	CO001	CO001	CO001	CO001	CO001
CT	CT001	CT001	CT001	CT001	CT001	CT001	CT001
DC	DC001	DC001	DC001	DC001	DC001	DC001	DC001
DE	DE001	DE001	DE001	DE001	DE001	DE001	DE001
FL	FL001	FL001	FL001	FL001	FL001	FL001	FL001
GA	GA001	GA001	GA001	GA001	GA001	GA001	GA001
IA	IA001	IA001	IA001	IA001	IA001	IA001	IA001
ID	ID001	ID001	ID001	ID001	ID001	ID001	ID001
IL	IL001	IL001	IL001	IL001	IL001	IL001	IL001
IN	IN001	IN001	IN001	IN001	IN001	IN001	IN001
KS	KS001	KS001	KS001	KS001	KS001	KS001	KS001
KY	KY001	KY001	KY001	KY001	KY001	KY001	KY001
LA	LA001	LA001	LA001	LA001	LA001	LA001	LA001
MA	MA001	MA001	MA001	MA001	MA001	MA001	MA001
MD	MD001	MD001	MD001	MD001	MD001	MD001	MD001
ME	ME001	ME001	ME001	ME001	ME001	ME001	ME001
MI	MI001	MI001	MI001	MI001	MI001	MI001	MI001
MN	MN001	MN001	MN001	MN001	MN001	MN001	MN001
MO	MO001	MO001	MO001	MO001	MO001	MO001	MO001
MS	MS001	MS001	MS001	MS001	MS001	MS001	MS001
MT	MT001	MT001	MT001	MT001	MT001	MT001	MT001
NC	NC001	NC001	NC001	NC001	NC001	NC001	NC001
ND	ND001	ND001	ND001	ND001	ND001	ND001	ND001
NH	NH001	NH001	NH001	NH001	NH001	NH001	NH001
NJ	NJ001	NJ001	NJ001	NJ001	NJ001	NJ001	NJ001
NM	NM001	NM001	NM001	NM001	NM001	NM001	NM001
NY	NY001	NY001	NY001	NY001	NY001	NY001	NY001
OH	OH001	OH001	OH001	OH001	OH001	OH001	OH001
OK	OK001	OK001	OK001	OK001	OK001	OK001	OK001
OR	OR001	OR001	OR001	OR001	OR001	OR001	OR001
PA	PA001	PA001	PA001	PA001	PA001	PA001	PA001
RI	RI001	RI001	RI001	RI001	RI001	RI001	RI001
SC	SC001	SC001	SC001	SC001	SC001	SC001	SC001
SD	SD001	SD001	SD001	SD001	SD001	SD001	SD001
TN	TN001	TN001	TN001	TN001	TN001	TN001	TN001
TX	TX001	TX001	TX001	TX001	TX001	TX001	TX001
UT	UT001	UT001	UT001	UT001	UT001	UT001	UT001
VA	VA001	VA001	VA001	VA001	VA001	VA001	VA001
VT	VT001	VT001	VT001	VT001	VT001	VT001	VT001
WA	WA001	WA001	WA001	WA001	WA001	WA001	WA001
WI	WI001	WI001	WI001	WI001	WI001	WI001	WI001
WV	WV001	WV001	WV001	WV001	WV001	WV001	WV001
WY	WY001	WY001	WY001	WY001	WY001	WY001	WY001

The listing of a product on the NCP Product Schedule indicates only that the technical product data submission requirements have been satisfied. It does not indicate that a product is recommended or endorsed by EPA or the NRT for use on an oil spill.

However, in most situations, products must be listed on the NCP Product Schedule to be used in response to an oil spill.

### How Do Products Get Listed on the NCP Product Schedule?



To get a product listed on the NCP Product Schedule, a manufacturer must submit technical data on the product to EPA. Specific guidelines for vendors are contained

in 40 CFR part 300, Subpart J, "Use of Dispersants and Other Chemicals" (40 CFR 300.915). In order to be listed, a dispersant must obtain an effectiveness value of 50% + or - 5% for the Dispersant Effectiveness Test.



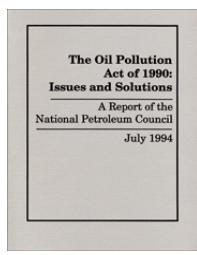
Most products must be tested using a standard toxicity test. Bioremediation agent submissions must include the successful results of a 28 day Bioremediation Agent Effectiveness Test.

Following the submission of data, EPA reviews the data to confirm completeness and determine whether the specified procedures were followed. The Schedule is updated every two months or as needed.

### For More Information. . .

On the NCP Product Schedule, or to obtain a copy of the Schedule visit the EPA website at [ww.epa.gov/oem/content/ncp/index.htm](http://ww.epa.gov/oem/content/ncp/index.htm) or contact the NCP information line at 202.260.2342.

### What are the Roles of the RRT, Area Committee, and SSC?



The Oil Pollution Act of 1990 encourages RRTs and Area Committees to assess the desirability of using agents listed on the NCP Product Schedule and develop pre-authorization plans (also called preapproval agreements) in advance of an incident.



The EPA representative to the incident-specific RRT, the incident-specific RRT representatives from the state(s) with jurisdiction over the navigable waters to which the pre-authorization plan applies, and the Department of Commerce and Department of the Interior representatives to the incident-specific, as natural resource trustees, must review and either approve, disapprove, or approve with modification these pre-authorization plans.

Scientific Support Coordinators (SSCs) support the RRT and Area Committee in



preparing pre-authorization plans and in conducting spill training and exercises. In these roles, the SSC provides leadership and assistance in synthesizing and integrating technical and scientific information required for spill response decisions.

### What are Pre-Authorization Plans?

The RRT and Area Committees can develop a preauthorization plan for a product or technology regulated by the NCP Product Schedule.

With a pre-authorization plan in place, the OSC can proceed with the product's use according to the preauthorization plan without obtaining concurrence from the RRT or trustee agencies during emergency response to an incident.

Typically, such preauthorization plans outline zones where or conditions under which products may be used.

These are generally based on geographic area, distance from the shoreline, water depth, and/or season.

### What is the Role of the Federal On-Scene Coordinator?

The NCP (40 CFR 300.105) gives the Federal OSC primary responsibility for directing response efforts and coordinating all other efforts at the scene of an oil discharge to or which threatens navigable waters.

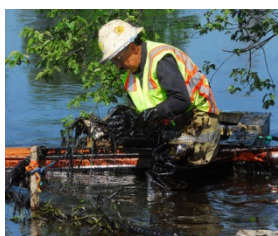
The OSC is charged with initiating defensive actions as soon as possible to prevent, minimize, or mitigate threat(s) to the public health or welfare of the United States or the environment.



For oil discharges, this may include the use of chemicals, such as dispersants, and other materials that restrain the spread of the oil and mitigate its effects. This primarily consists of products listed on the NCP Product Schedule.

### **How are Scientific and Technical Assistance Obtained?**

Because the use of chemical or biological countermeasures requires scientific and technical expertise, the OSC will typically ask for assistance from an SSC, who serves on the OSC's staff and may coordinate input from the scientific team. The SSC can



also integrate expertise from governmental agencies, universities, community representatives, and industry to assist the OSC in developing response strategies.

### **What are the Roles of the RRT and Area Committee?**

Although the OSC has primary responsibility for directing response efforts, the OSC is typically not the sole decision-maker regarding a product's use for mitigating a spill (see "Exceptions to the Rule" below). Unless the OSC has a pre-authorization plan, the OSC must first obtain concurrence of the incident-specific EPA representative to the RRT, and, as appropriate, the RRT representatives from the state(s) with jurisdiction over the navigable waters threatened by the release or discharge.

In addition, as practicable, the OSC should consult with the Department of Commerce and DOI, as natural resource trustees. If there is no incident-specific RRT activated, the appropriate RRT members must be convened for an incident-specific authorization. The Area Committee will typically have included appropriate measures for mechanical recovery and potential non-mechanical countermeasures in the ACP. As a result, the Area Committee may be able to help the OSC coordinate

with Federal, state, and local officials to expedite decisions for the use of non-mechanical countermeasures and other mitigating substances and devices.

### **Are There Any Exceptions to the Rule?**

The OSC may authorize the use of any chemical or biological countermeasure, including products not listed on the NCP Product Schedule, without obtaining the concurrence of the incident-specific RRT when the OSC believes that use of the product is necessary to substantially reduce a hazard to human life.

When the OSC authorizes the use of a product under the safety exception, the OSC must inform the EPA representative to the RRT, the RRT representatives from the state(s) with jurisdiction, and the natural resource trustees as soon as possible. Once the threat to human life has subsided, the continued use of additional products must follow the standard approval process described above.

### **What About Local Government Responders?**

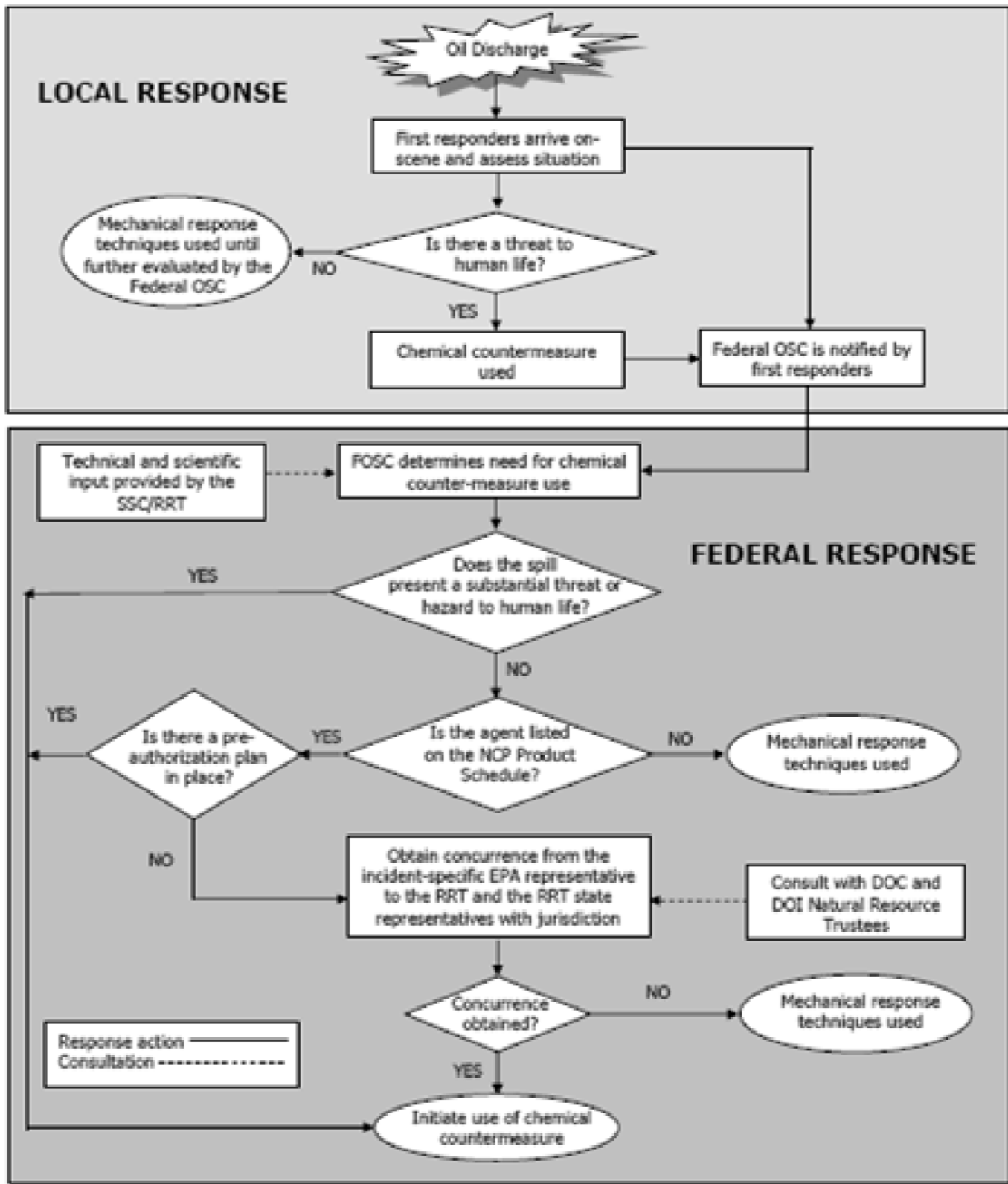
Decisions on public safety issues are typically under the purview of the local lead public emergency response agency. Under the safety exception previously noted, fire departments and hazardous materials teams have the authority to treat a spill using a chemical countermeasure if they determine that the spilled oil could cause an explosion and/or threaten human health. If a chemical countermeasure is used, responders should make every attempt to contain the fuel/chemical mixture (runoff) and prevent it from entering storm drains or other environments where 100 percent product/oil recovery is not possible.



However, if local responders use firefighting foam or "surface washing agents," which are defined in Subpart J and listed on the NCP Product Schedule, in situations where they may be discharged into a navigable waterway, OSC authorization and RRT concurrence should be sought.

The decision flow chart on the next page shows how decisions are made to use chemical and biological countermeasures during a response.

## Decision Flow Chart for Using Chemical Counter-measures or Dispersants





# New versions of ALOHA and CAMEO Chemicals are now available

- Download ALOHA 5.4.3 at <http://www.epa.gov/emergencies/content/cameo/aloha.htm>
- Visit the CAMEO Chemicals website version at <http://www.cameochemicals.noaa.gov>
- Download the CAMEO Chemicals 2.2 desktop version at <http://www.response.restoration.noaa.gov/cameochemicals>



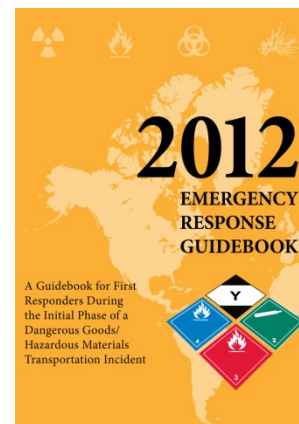
Note: If you're using the desktop version of CAMEO Chemicals 2.1, you can use the automatic update feature to get the latest version. The next time you start CAMEO Chemicals 2.1, it will notice that there is a new version available and give you the chance to auto update. If you say yes, the program will download and install the new version for you automatically. (If you have trouble with the automatic update feature, uninstall CAMEO Chemicals 2.1 and then manually download and use the CAMEO Chemicals 2.2 installer from the link provided above.)

## What's changed in ALOHA 5.4.3?

- Updated chemical library with new AEGLs and PACs. (The PACs dataset is a hierarchy-based system of the three common public exposure guideline systems: AEGLs, ERPGs, and TEELs. The latest PACs dataset is a major update: it includes the latest AEGLs and a significant update to the TEELs based on recommendations from an outside review committee. The TEEL developers have significantly modified the methodology for developing TEELs, which has resulted in one or more TEEL values changing for approximately 80 percent of the chemicals in the PACs dataset.)
- Minor changes and bug fixes.

## What's changed in CAMEO Chemicals 2.2?

- Updated data to include new AEGLs, PACs, Hazmat Table (49 CFR 172.101) values, and DOT Hazard Labels.
- Revised advanced search so that all text fields allow "contains" searches. When your search criteria includes multiple words (in this case, "words" are any words or phrases separated by spaces), the search looks for matches that contain the words in any order. (If you want to find a multi-word phrase that matches your search criteria exactly--including spaces and punctuation--run a "contains exact phrase" advanced search.)
- Modified chemical datasheet fields to include a special note when the field has information from the Emergency Response Guidebook (ERG). The note identifies the specific ERG Guide that the recommendations come from--and it provides a link to a PDF of that guide.
- Revised the order of some identifiers on the chemical datasheets: CAS Numbers are now first, followed by UN/NA Numbers and then DOT Hazard Labels.
- Minor changes and bug fixes.

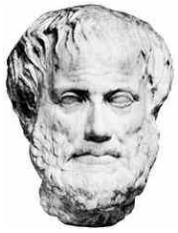


# Will national standards kill rural response?

© 2012 Frederick J. Cowie, Ph.D.

406-431-3531

fredcowie@aol.com



Aristotle said "virtue is in the middle."

Well that's what I've always said, anyway, and besides, who cares what that ol' Aristotle guy said,

anyway, right? To tell the truth, I don't read Greek, and really never read much of Aristotle, but he was a real smart dude.

I always say Aristotle meant something like "courage" was in the middle of the extremes, at which sat foolhardiness and cowardliness.

Aristotle is long gone, but in our search for truth, wisdom, and the path to maturity, stability, and



success, we should not care where good ideas come from. Be it from Aristotle or Confucius or any of hundreds of wise thinkers, or some other promoter of personal growth via aphorisms, proverbs, and bumper-sticker dicta, a good idea is a good idea. For the most part, Aristotle was right -- virtue is in the middle, and perhaps that's where we should look for the answer.

Now, what has all that to do with rural response, federal regulations and national standards? Hmm. Good question! Well, the extremes here, it seems to me, are high-tech, ultra-modern response (the regulations and national standards end) and volunteerism and personal safety on the other hand (and, you guessed it,

that would be the rural end of that spectrum). There's not much overlap here and over the years it's been an uneasy truce. The problem is, many regulations and national standards make good sense in metropolitan areas with tax supported, full time, paid responders and they are hard to implement in small burghs with no population base, tax base, or governmental infrastructure base.

Simply put, to heed Aristotle, we individualistic contrarians have to see the value in the big picture, learn to appreciate national issues and needs, give in a little, and move more to the center; while the decision makers have to see that we (in small towns and rural states) have concerns which don't get much past five or fifty miles from home.

As a nation, we are in danger of using national priorities to regulate and certificate away local, rural response which is performed by individuals whose priorities are not those at the national end of the spectrum.

I know of at least one rural county seat which has lost its



ambulance service due to it being regulated out of existence. C'mon folks, there has to be some common ground in the middle, some virtue, lest we in dirt-road America have to transport in the back of pickups, which we will do!

Where's Aristotle when we need him?

Here's my response to responses: There are lots of towns in extremely rural "frontier" areas where the optimal goal of responders is simply to "stabilize" until help comes from some service >50 miles away.

Idea A)

Create some great "Good Samaritan" laws to protect ex-EMTs who stop to help folks with heart attacks, folks caught in fires, victims of car wrecks, etc.

Idea B)

Create some geographic Stabilize (non-transport, non-aggressive)-Basic-Advanced network model, like the hazmat Awareness-Ops-Hazmat Team model. That would make some sense.....at least its more in the "middle." That would be better than no EMT/ambulance service at all.

Unfortunately, the current response to a town losing its ambulance service is "Well, they're just not up to the standards, period."

When the real response be should be "How do we get service for this town?" In other words, the typical is response is "They can't get to our end of the spectrum, that's it."

But perhaps the response should be, with "national standards" on one end and "no ambulance service" on the other, the solution is probably nearer to Aristotle's virtuous middle.



**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
*****	
National Response Center	800-424-8802
EPA Region 6	866-372-7745
CHEMTREC	800-424-9300