



**PRELIMINARY AGENDA
NORTH CENTRAL FLORIDA (DISTRICT 3)
LOCAL EMERGENCY PLANNING COMMITTEE**

Foley Cellulose LLC
One Buckeye Drive, Perry, FL

26 May 2016
10:00 a.m.

- I. INTRODUCTIONS AND CHAIR REPORT**
- II. APPROVAL OF FEBRUARY 18, 2016, MEETING MINUTES**
- III. LEPC BUSINESS ITEMS**
 - a) LEPC Member Policies Update
 - b) County Reports on Hazardous Materials Activities and Exercises
 - c) Tier 2 Reporting and Hazards Analysis Update
 - d) Requests for and Distribution of 2016 Emergency response Guidebooks
 - e) LEPC Funding Issues
- IV. PUBLIC INFORMATION ISSUES**
 - a) 30th Anniversary of the Emergency Planning and Community Right-to-Know Act (EPCRA) / Hazardous Materials Awareness Week 2016:
 - b) Shelter In-Place Training / Contacting Critical Facilities Within Threat Zones of Section 302 Sites
 - c) Other Public Information Issues
- V. FIRST RESPONDER ISSUES**
 - a) Hazmat First Responder Training Program and Classes
 - b) Pipeline Technical Assistance Grant Update
 - c) Status of Supplemental Environmental Projects Website and Database
 - d) Update on Commodity Flow Study: Planning Project for Fiscal Year
 - e) Regional Hazmat Team Update - Meeting, 1:00 pm
 - f) Proposed Exercise Program Requirements for Risk Management Program (Clean Air Act Section 112(r))
- VI. OTHER BUSINESS AND INFORMATION REQUESTS**
- VII. NEXT MEETING DATE AND LOCATION**

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**NORTH CENTRAL FLORIDA LOCAL EMERGENCY
PLANNING COMMITTEE MINUTES**

Gainesville Regional Utilities Eastside
Operation Center, Gainesville

Thursday, February 18, 2016
10:00 a.m.

MEMBERS PRESENT

Shayne Morgan, Chair
Sandi Courson
Sam MacDonell
James Sommers for
Robert Garbett
Robyn Gedeon
Carl G. Glebowski
Scott Holowasko
Gracie Kennedy for
Matt Harris
Bruce Jordan
Paul Kremer
David Peaton, Vice Chair
Ebbin Spellman
Dan Smith
T.F. "Tim" Smoak
Erin Miller
Ed Ward
Todd Clifford
Steve Sererance for
David Knowles
John MacDonald
Chris Gilbert for
Agustin Olmos

MEMBERS ABSENT

Tim Alexander
Frank Armijo
Dave Dickens
Scott Garner
Mitch Harrell
Jeff Huffman
Sylvia Ifft
Brian Johns
Kevin Denney
Henry Land
Marc Land
David Meurer
David Sill
Kimberly Thomas
Ken Braswell
Richard Dennis
Jimmie Enderle
Steve "Pat Feagle
Peter Kaminski
Randy Ming
Stewart Robinson
Alan Whigham

STAFF PRESENT

Dwayne Mundy

GUESTS PRESENT

Kenny Adeshile
Jamie Arleo
Raymond Baxter
David Benton
Cassidy Carlile
Scott Chappell
Todd Clifford
Billy Dean
Jordan Dern
John Feagle
Kurt Fogleman
Michael Fowler
Robyn Gedeon
Steve Hendrick
Rodney Hoffman
Jason Islam
Frances Klisiewicz
Keith Knelle
Michael Laycock
Ali Leaphart
Ron Mills
Samuel Shaw
Ralph Smith
Rusty Smith
Larry Stewart

The meeting was called to order at 10:05 a.m.

I. CHAIRMAN'S REPORT AND INTRODUCTIONS

Chairman Shayne Morgan welcomed everyone and asked that they introduce themselves. Scott Holowasko welcomed everyone to the Gainesville Regional Utilities Eastside operations Center and said that the meeting room is available to other government organizations. Chairman Morgan gave a brief sheriff's report on activities that occurred at the recent state emergency response commission meeting.

II. APPROVAL OF November 19, 2015 LEPC MEETING MINUTES

Action: It was moved for approval on the minutes on November 19, 2015. It was moved by David Keaton and seconded by Chris Gilbert to adopt the minutes of the November 19, 2015 meeting as printed. Motion passed unanimously.

III. LEPC BUSINESS ITEMS

The presentations of the Thomas Yatabe Outstanding Achievement Award and certificates of appreciation was conducted next former LEPC chair Ron Mills was presented with the Yatabe award and recently retired LEPC member Paul Kramer was also given a certificate of appreciation. Former LEPC 5 chairman Jaime Arleo was also given a certificate of appreciation.

Next, each county reported on hazardous materials related activity and exercises that have occurred since their last meeting. In Alachua County, Gainesville Fire Rescue reported Hazardous Material Technicians to the 2016 Hazardous material symposium as funded by the LEPC. Gilchrist County announced that they were hosting a pipeline safety table top exercise on February 24, 2016. Levy County reported they will be attending the next table top exercise and that they were conducting public safety training online. Marion County reported that they have been busy structuring their hazardous materials training program they are working on an in house exercise and that they also sent technicians to the hazardous materials symposium. They added that portions of the state wide hurricane exercise would involve continuity of operations relocations to the Florida State Fire College on May 18th & 19th and that a hazardous material incident could be involved on the 18th. Ocala Fire Rescue also reported that sending technicians to the hazardous materials symposium. Madison County reported that they hosted a shelter in place train the trainer class last month as a prototype LEPC project. Taylor County reported that Georgia Pacific has purchased the Paper Mill commonly referred to as buck eye and are in a transition at that facility.

Dwayne Mundy reported on Tier Two reporting and gave an update on a Hazard analyses. He said that the Tier Two reports for the previous calendar year are due March 1st of each year. He said that a how to report online workshop for facilities was held earlier at the Fire College in Ocala and from 8-9:30 before the meeting today. He reported that the state hazard analyst workgroup will be continuing to advocate improvements to be processed. Priorities include training for people to use the hazard analysts as well as prepare them, the elimination of information disconnects in the process, and improved technical distribution methods venture that this information is available to responders.

The group discussed different ways of increasing preparedness between facilities, fire departments, emergency management, hazmat teams, and the LEPC. It was reported that this is the annual meeting where all facilities are invited to attend and meet the

LEPC and become familiar with the projects that they are involved in. Dwayne Mundy reported that 650 emails were sent and 250 letters to businesses and organizations on the Florida Department of Environmental Protection tank data based that appear to perhaps have reporting requirements.

IV. PUBLIC INFORMATION

The 30th anniversary of the emergency planning and community right to know act is on October 17, 2016. A brief history of the reenacting of the legislation that created the LEPC and Hazardous Materials Plan was discussed. Ideas for activities to acknowledge and share with the public were discussed. Items included sending resolutions out again to the local governments to ask them to join in and recognize 30 years of emergency preparedness activities and reminding them that their local fire departments are the front line of defense in hazardous material safety. The LEPC should review what we have accomplished in 30 years at our November meeting. The LEPC outreach efforts would be using the hazard analysis and the critical facility inventory to identify which critical facilities are in the vulnerable zone in the worst case chemical release from a section 302 site. The importance of the sheltering in place training was also discussed and that a hand out should be put together to explain shelter in place options as well as a refinement of the training program.

The LEPC membership was reviewed and was noted that law enforcement and media are categories which need new members. Chairman Morgan reviewed the changes to the LEPC guidelines proposed for adoption by the state emergency response commission.

V. FIRST RESPONDERS ISSUES

An update was given on the first responder training program and classes upcoming classes include a three day chlorine class organized by Gainesville Regional Utilities. Scoot Chapel reported that in Florida there are 30 funded state hazardous material teams and encouraged the LEPC to be involved in a capabilities assessment to help identify vulnerabilities and opportunities for improvement. He also said that there is work on trying to collect additional response data for Florida Special teams including hazardous materials, Special Weapons and Tactics and Urban Search and Rescue.

An update was given on the technical assistance grant including the one table top exercise that has been conducted and the next one which is planned. Other activities include putting together a pipe line training trailer and identifying facilities formal to pipeline releases. Responders were encouraged to visit the Floridadisaster.org/SEP website and enter in potential needed equipment for any needed hazardous materials response equipment. Supplemental environmental projects

give companies that have the potential to be fined the opportunity to make a donation of equipment or supplies to their local fire department in exchange for paying less on the fine.

An update was given on the planning project for the year which was to conduct a commodity flow study of the highway systems. Counties were encouraged to think about where would be a good location in their county and to consider helping volunteer to collect this information. It was noted that the regional hazardous materials team would be meeting today in the same location at 1 p.m.

Dwayne Mundy reported that the LEPC meeting packet includes a region wide summary of which hazardous material are reported in the greatest quantities. He said 160 facilities report over 120 million pounds of sulfuric acid; 15 facilities reporting 5.9 million pounds of ammonia and that 44 sites report slightly over 1 million pounds total of chlorine. He said this information is available broken down for each county. Also, included in the handout is a list of facilities included in the Florida Department of Environmental Protection tanks data based that appear to have reporting requirements.

Chairman

Date

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**FLORIDA STATE EMERGENCY RESPONSE COMMISSION
POLICIES FOR
LOCAL EMERGENCY PLANNING COMMITTEES**

(Revised 04/16)

I. APPOINTMENT

A. Local Emergency Planning Committees (LEPCs) must have representatives from the following occupational categories, as required in Section 301 (c) of the Emergency Planning and Community Right-To-Know Act (EPCRA):

1. elected state and local officials
2. law enforcement;
3. emergency management
4. firefighting;
5. first aid;
6. health;
7. local environmental;
8. hospital;
9. transportation personnel;
10. broadcast and print media
11. community groups;
12. facility owners and operators
13. interested citizens;
14. non-elected local officials; and
15. water management district representatives.
16. local option
17. education

There should be a continued good faith effort on behalf of the LEPC chairperson to ensure that all of the occupational categories are represented on the LEPC.

B. For the purpose of appointment, the State Emergency Response Commission (SERC) has defined “Interested Citizen” as “a person who resides in the emergency planning district for which appointment is sought to the LEPC, and who is interested in the emergency planning process, but who does not otherwise represent those groups or organizations designated by state and federal law.”

C. For the purpose of appointment, Water Management District (WMD) representatives can be staff or board members of the five established WMDs. Membership in this category is limited to one member. An effort should be made to encourage a separate representative for each LEPC.

D. Two types of appointments will be considered for the LEPCs:

1. Regular Appointments – Recommendations for appointments of members and alternate members to an LEPC must be directed to the Compliance Planning Section from the LEPC chairperson. These recommendations must be made in writing and/or submitted via electronic mail. LEPC nominations will be considered at the next scheduled SERC meeting. **All appointments must be approved by the SERC.**
2. Fast-Track Appointments – The SERC chairperson, or alternate chairperson, may fill vacancies on an “interim basis” until the SERC has an opportunity to review and approve the recommendations. However, this appointment method shall only be used when extenuating circumstances warrant. The recommendations can be made by telephone, but will require written follow-up and/or may be submitted electronically. The SERC chairperson, or alternate chairperson, shall respond within ten days of receiving an oral or written request for recommendation.

E. LEPC members and alternates shall be appointed for a two-year term.

1. SERC will re-appoint all existing LEPC memberships for additional two-year terms each July of all even-numbered years.
2. In the event the SERC does not act on biennial appointments prior to July 1, all appointments will remain in effect until the SERC takes official action.
3. All members may be re-nominated and re-appointed through the SERC’s biennial appointment process.

F. A member may recommend an individual to serve as his/her alternate. With the exception of the elected state or local officials category, the alternate must represent the same occupational category as the primary member. A member in the elected state or local officials category may recommend his/her aide or a district staff member to serve as his/her alternate. The member’s recommendation must be made in the form of a letter to the LEPC chairperson. An LEPC chairperson shall recommend alternate nominations to the SERC in the same manner as regular appointments. All alternate nominations shall be accompanied by the primary member’s initial written request. The SERC shall review and consider recommendations for alternates at its next scheduled SERC meeting.

1. It will be the responsibility of the LEPC Coordinators to inform the alternates of meeting dates, and to provide them with pertinent meeting materials.
 2. If both the member and the alternate are present at a meeting, the member has one vote; the alternate has no vote.
 3. If the primary resigns and is not immediately replaced, the alternate becomes the primary member. If the state or local official resigns and they have chosen their aide as their alternate, the aide is automatically removed with the primary.
 4. An alternate member may not serve as an officer of the LEPC.
- G. The LEPC chairpersons and vice-chairpersons shall serve a two-year term and be elected in accordance with “Roberts Rules of Order.” New LEPC chairpersons and vice-chairpersons shall be elected at the first organizational meeting following biennial appointments. The former chairperson shall serve as interim chairperson until said meeting is held and elections can be conducted.
- In the event that a chairperson resigns or is removed from the LEPC, the vice-chairperson shall preside until a new chairperson can be elected.
- H. The maximum size of the LEPC and the maximum size of the occupation category is up to the discretion of the LEPC.
- I. LEPCs can establish “Technical Advisory Workgroups” consisting of volunteers that will provide assistance to the LEPC in a variety of areas (i.e., planning, public outreach). Non-appointed workgroup members do not have LEPC voting privileges.
- J. Nine members constitute a quorum count.
- K. There should be a continued good faith effort on behalf of the LEPC chairperson to ensure district wide representation on the LEPC.
- L. When an LEPC member changes occupational categories, he/she must notify the LEPC chairperson. Upon doing so, the LEPC member’s appointment will be reviewed. The LEPC chairperson may then recommend to the SERC chairperson that the member be appointed to another occupational category, if appropriate.

II. RESIGNATION AND TERMINATION PROCESS

- A. When an LEPC member provides written notice of resignation to the LEPC chairperson, or to the SERC, that member will be removed by the SERC.
- B. In the event written confirmation of a resignation is unobtainable, a verbal confirmation from the member or the chairperson of an LEPC to the SERC will be acceptable.
- C. Attendance policies are at the discretion of the LEPC.
- D. If a member is recommended for removal from an LEPC by the above process, or for any other reason, the SERC will send a letter to that LEPC member identifying the reasons for removal.

III. CODE OF CONDUCT

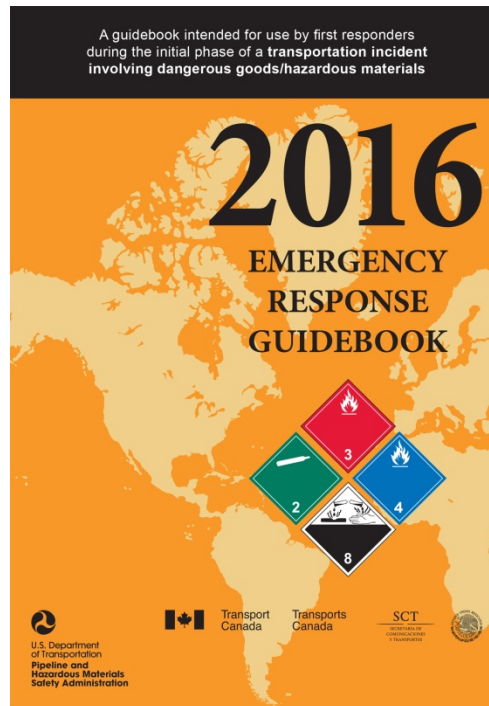
- A. All members of the LEPCs shall be advised of the provisions of the Florida Code of Ethics for Public Officers and Employees (Sections 112.311 et seq., Florida Statutes) and provided written information regarding their responsibilities thereunder:
 - 1. to avoid conflicts of interest;
 - 2. to avoid using Committee membership for private gain;
 - 3. other requirements of the Code of Ethics.
- B. All members of the LEPCs shall be expected to adhere to the provisions of the Florida Code of Ethics for Public Officers and Employees.
- C. All members of the LEPCs shall to adhere to Florida Statute 286 Sunshine Law and Florida Statute 119 Public Meetings.
- D. All members of the LEPCs shall to conduct themselves in the relationship to the Committee, in a manner so as to not disrupt any meeting, operation, or proceeding, and so as not to improperly interfere with the fulfillment of the mission and responsibilities of the Committee.
- E. Violations of the provisions of the Code of Ethics shall be handled in the manner provided in Chapter 112, Part III, Florida Statutes. Non-ethical violations of the LEPC Membership Code of Conduct shall be referred to the SERC utilizing the following procedures:
 - 1. Any complaint regarding a non-ethical violation of the LEPC Membership Code of Conduct shall be expressed in a petition

endorsed by a minimum of three members of the pertinent LEPC. The petition shall be in writing, addressed to the LEPC chairperson shall set forth in detail the facts which indicate a need for removal of a Committee member (the affected member) and be signed by all petitioners.

2. Following the receipt of the petition, the LEPC chairperson shall schedule the item at the next regularly scheduled LEPC meeting to consider the petition. On or before scheduling said meeting, the chairperson shall provide a copy of the petition to the affected member and each member of the Committee, with a notice regarding said special meeting or session, and advising the affected member and the petitioners to appear to discuss the charges set forth in the petition.
3. The LEPC shall act on the petition and forward its recommendation to the SERC chairperson. A recommendation for removal of the Committee member must pass by a majority vote of those LEPC members present.
4. The affected member may submit a written response to the SERC chairperson, which shall be distributed to the SERC membership.
5. At the SERC meeting at which the petition is considered, SERC staff shall present the position of the petitioners. Any questions by members of the SERC shall be referred to the petitioners, answered by the affected member or by SERC staff. The affected member may then present a response to the petition and answer any questions by members of the Committee. Both the representative of the petitioners and the affected member may ask questions of one another.
6. Should the affected member of the petitioners refuse or fail to appear, the SERC may consider the available evidence and reach a decision.
7. The SERC shall decide the matter of removal following its review and consideration of all the evidence presented to it, on motion duly seconded, made by the representative of the petitioners. If said motion is not made or seconded, the proceedings shall terminate without further action. The motion to recommend removal must pass by the affirmative vote of $\frac{3}{4}$ or more of those SERC members present.

Emergency Response Guidebook 2016

Coming Early 2016!



Preview of Updates

- Replaced written instructions on page 1 with a flow chart to show how to use the ERG2016.
- Expanded Table of Placards and updated title to Table of Markings, Labels, and Placards and Initial Response Guide to Use on Scene.
- Expanded Rail Car Identification Chart and Road Trailer Identification Chart to two pages each.
- Updated Table 1 and Table 3 based on new TIH data and reactivity research.
- Updated pipeline emergency response information.
- Added information about Globally Harmonized System of Classification and Labeling of Chemicals (GHS) markings.
- Added all new dangerous goods/hazardous materials listed in UN Recommendations on the Transport of Dangerous Goods to 19th Revised Edition.
- Added information on Emergency Response Assistance Plans (ERAP) applicable in Canada.



U.S Department of Transportation
Office of Public Affairs
1200 New Jersey Avenue, SE
Washington, DC 20590
www.transportation.gov/briefingroom

News

PHMSA 05-16
Tuesday, April 26, 2016
Contact: Artealia Gilliard
Tel.: 202-366-4831

DOT Releases New Emergency Response Guidebook *More Than 1.5 Million Free Copies to First Responders Nationwide*

WASHINGTON – The U.S. Department of Transportation’s (USDOT) Pipeline and Hazardous Materials Safety Administration (PHMSA) today released the 2016 Emergency Response Guidebook (ERG2016), providing first responders with an updated go-to manual to help respond to hazardous materials transportation accidents during the critical first minutes.

PHMSA will distribute more than 1.5 million free copies of the guidebook to firefighters, emergency medical technicians and law enforcement officers across the nation. Emergency first responders will use the ERG2016 to identify specific risks associated with compromised hazardous materials, and the recommended safety measures and procedures they should take to protect themselves and contain the incident as quickly as possible.

“We take the safety of this nation and its emergency responders very seriously,” said U.S. Transportation Secretary Anthony Foxx. “Our goal is to make sure that these first responders have the most current and accurate safety guidelines possible for use during that initial phase of a hazmat incident.”

The ERG contains an indexed list of dangerous goods and the associated 4-digit United Nations identification numbers. The ERG also identifies the general hazards those dangerous goods pose and recommends safety precautions in remediating a hazmat incident. For example, if emergency first responders arrive at the scene of an overturned tractor trailer displaying a USDOT hazardous material placard, they would use the guidebook to identify the material associated with the placard and how best to respond.

“The ERG is an invaluable tool during the initial stages of any hazmat transportation emergency. Taking the proper action during those critical first minutes impacts the safety of both the first responders and the people they serve,” said PHMSA Administrator Marie Therese Dominguez.

The 2016 version of the ERG includes general revisions, expanded sections and added guide pages for absorbed gases. Updated every four years as a collaborative effort of the USDOT, Transport Canada and Mexico’s Secretariat of Transport and Communications, the ERG2016 is

available free to public safety agencies in all states, territories and Native American Tribes through designated state emergency management coordinators' offices.

PHMSA has also partnered with the National Library of Medicine (NLM) to provide a free Smartphone version of the ERG2016. NLM also develops and distributes the Wireless Information System for Emergency Responders. The mobile application will be available this spring.

A copy of the new ERG2016 is posted online at: <http://phmsa.dot.gov/hazmat/outreach-training/erg>. Print copies of ERG2016 are available for sale to the general public through the U.S. Government Printing Office Bookstore at <http://bookstore.gpo.gov> and other commercial suppliers.

The mission of the Pipeline and Hazardous Materials Safety Administration is to protect people and the environment by advancing the safe transportation of energy and other hazardous materials that are essential to our daily lives. PHMSA develops and enforces regulations for the safe operation of the nation's 2.6 million mile pipeline transportation system and the nearly 1 million daily shipments of hazardous materials by land, sea, and air. Please visit <http://phmsa.dot.gov> or https://twitter.com/PHMSA_DOT for more information.

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Preliminary Agenda

Shelter In-Place Train-the-Trainer
Foley Cellulose LLC, One Buckeye Drive, Perry, FL
May 26, 2016, 9:00 am
(One Hour Prior to LEPC Meeting)

1. Introductions
2. Overview of LEPC
3. Shelter in-Place Presentation
4. LEPC Resources for Homes, Schools and Businesses
5. Shelter In-Place Decision Making
6. LEPC Support for Shelter In-Place Classes
7. Questions

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Staffed by the North Central Florida Regional Planning Council
2009 NW 67th Place, Gainesville, FL 32653 -1603 • 352.955.2200.



Agenda

Using Hazards Analyses in CAMEO for Emergency Planning Tuesday, June 7, 2016, 8:30 am - 4:00 pm Gilchrist County Emergency Operations Center, Bell, FL

Introduction

Software Review and Installation

- CAMEO
- CAMEO Chemicals
- MARPLOT
- ALOHA
- 2016 ERG - pdf file or smart phone app

Data Review and Installation

- E-Plan Tier 2 Chemical Inventory - Download zip file
- FDEM SharePoint Data Portal - Critical facility inventory
- Hazards Analyses Update cycle

Hazards Analysis Overview

- Tier 2 reports and hazards analyses: Who is included? Who is excluded?
- Site Visits and entering data into CAMEO
- Evacuation routes, transportation routes, threatened populations
- Hazards Analysis Working Group

Using CAMEO

- Identifying facilities with chemicals present in a community
- Identifying chemicals present in a community and hazards (toxic, flammable, or both)
- Calculating threat zones - Screenings and Scenarios, worst case conditions
- Identifying critical facilities and residential population within a threat zone
- Facility emergency personnel and telephone numbers
- Site plan and site verification form

Identifying Exclusion Distances for Transportation Incident

- MARPLOT
- 2016 ERG

Additional Training Available

- ALOHA - Modelling Releases
- Sheltering In-Place Decisions
- LSU and other advanced training classes

Summary and Questions

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PHMSA FOA # DTPH5615SN0002 -- Resources, Milestones and Budget
NORTH CENTRAL FLORIDA REGIONAL HAZARDOUS MATERIALS RESPONSE TEAM

Activity	Resources	Milestones	Budget	Oct-Dec 2015	Jan-Mar 2016	Apr-June 2016
				Q1	Q2	Q3
Planning - identifying vulnerabilities in vulnerable areas	Additional resources to enhance planning and identify vulnerable locations will be available as a result of this grant.	Initial Milestones would be to Identify out of date planning information currently contained in the National Pipeline Mapping System (1) and the Celeritas Identified Site Registry (2) and provide updated geospatial information (3). An additional milestone is to propose a methodology (4) that could be used in Florida to continue sharing up-to-date critical facility inventories available in every Florida county compiled by the Florida Division of Emergency Management to provide an up-to-date common, operating picture for planning and response . Q1: (1),(2) Q2:(3) Q3:(4)	\$ 7,000	\$ 3,000	\$ 3,000	\$ 1,000
Community Outreach	Resources from this grant will help increase public safety and preparedness though a better prepared public aware of pipeline hazards and potential protective actions.	The Team will prepare (5) and distribute (6) to local media outlets a press release advising the public of steps being taken to enhance pipeline safety by emergency responders. This milestone will included information on pipeline hazards and potential protective actions, where additional information is available, as well as contacts for local emergency management agencies. Q1: (5) Q2:(5) Q3:(6)	\$ 5,000	\$ 1,000	\$ 1,000	\$ 3,000
Three Table Top Exercises	Public safety and preparedness will be enhanced due to this grant by providing responders and facility operators an opportunity to increaqsing planning and response strategies.	Conduct Three Tabletop Exercises to center on emergency response activities with the compressor stations in Bradford (Brooker), Gilchrist (Bell), and Taylor (Perry) Counties. Response to a future Sabal Trail incident will be included in the Gilchrist County exercise. Milestones would include the preparation of the scenarios contained in the Exercise Plan/Situation Manual (7, 8, 9), conducting the three exercises (10, 11, 12), and preparing After Action Reports (13, 14, 15) for each of the three exercises in accordance with the Homeland Security Exercise and Evaluation Process (HSEEP). An additional milestones would include providing the After Action Report and Improvement Plan Matrix to the Local Emergency Planning Committee for inclusion in the next Multi-Year Training and Exercise Plan (MYTEP) developed using the Department of Homeland Security Readiness: Training Identification and Preparedness Planning (R:TIPP) process (16). Q1: (7),(10),(13) Q2:(8),(11),(14) Q3:(9),(12),(15),(16)	\$ 18,000	\$ 6,000	\$ 6,000	\$ 6,000
Enhance Existing Hazmat Training Program to include Pipeline Responses:	The existing hazmat transportation emergency response training program for public responders is an existing resource that will be enhanced by this project. This is currently funded through the US Department of Transportation Hazardous Materials Emergency Preparedness grant program.	There is an identified gap in the regional hazmat training program that needs to include pipeline safety and response training beyond the current awareness level. This should include response to both leaks and the secondary consequences associated with the direct and indirect impacts of a pipeline leak. Milestones will include building (17) natural gas leak training props (\$9,620) and a purchasing (18) a small trailer (\$4,040) to transport this around the region. These items will be used in training classes where the instructors are funded through the existing HMEP training grants. Q1: (17) Q2:(18)	\$ 13,660			
		Contractual:	\$ 30,000	\$ 10,000	\$ 10,000	\$ 10,000
		Supplies:	\$ 13,660	\$ 13,660		
		Total:	\$ 43,660	\$ 23,660	\$ 10,000	\$ 10,000

Note: Planning - identifying vulnerabilities in vulnerable areas, Community Outreach, and the Table Top exercises (\$30,000 total) will be conducted under contract for a fixed fee with the North Central Florida Regional Planning Council. The Regional Hazmat Team has an agreement with the Council to provide support to the Regional Team.



**PRELIMINARY AGENDA
NORTH CENTRAL FLORIDA REGIONAL
HAZARDOUS MATERIALS RESPONSE TEAM POLICY BOARD**

Foley Cellulose LLC
One Buckeye Drive, Perry, FL

26 may 2016
1:00 p.m.

- I. Introductions and Chair Report
- II. Approval of February 18, 2016, Meeting Minutes
- III. New Business:
 - a) Adoption Process for Revised Interlocal Agreements by Member Local Governments
 - b) Expansion of Team and Operational Status of Team Members
- IV. Close-Out of Technical Assistance Grant for Pipeline Safety:
 - a) Approval of After Action Reports for Perry, Trenton and Brooker Pipeline Safety Table Top Exercises
 - b) Purchasing Pipeline Training Trailer and Supplies (\$13,660)
 - c) Public Outreach Project for Pipeline Safety
 - d) Pipeline Planning and Identification of Critical Facilities in Pipeline Vulnerable Areas
- V. Hazardous Materials Response Teams Self Assessments
- VI. Other Business and Next Meeting

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On April 12, 2004, a runaway chemical reaction at MFG Chemical, Inc., in Dalton, Georgia, resulted in the release of toxic vapor clouds of allyl alcohol and allyl chloride into the surrounding community. The accident resulted in the evacuation of more than 200 families and medical treatment for 154 people, including 15 responders. The CSB found that MFG did not train or equip employees to conduct emergency mitigation actions, and that local emergency response agencies did not adequately prepare for responding to emergencies involving hazardous chemicals. The CSB recommended that the facility obtain equipment and provide emergency response training to employees, and that local agencies conduct drills for emergencies at fixed facilities.¹⁸⁶

Other EPA and Federal agency programs require exercises as an element of their emergency response programs. For example, under the Oil Pollution Prevention regulation (40 CFR part 112), facilities subject to the Facility Response Plan (FRP) provisions are required to conduct exercises, including evaluation procedures (§ 112.21). FRP facility owners and operators are encouraged to follow the National Preparedness for Response Exercise Program (PREP) Guidelines,¹⁸⁷ which were developed to provide a mechanism for compliance with EPA, U.S. Coast Guard (USCG), and U.S. Department of the Interior (DOI) exercise requirements for oil pollution response. The PREP guidelines include both internal and external exercise components. Internal exercises include notification exercises, emergency procedure exercises, spill management team tabletop exercises, and equipment deployment exercises. External exercises include area exercises that include members of the response community, and government-initiated unannounced exercises.

Other examples include exercises that the U.S. Nuclear Regulatory Commission (NRC), in conjunction with the Federal Emergency Management Agency, requires commercial nuclear power plant operators to perform with state and local governments. These exercises evaluate both on-site and offsite emergency response capabilities. The NRC requires all nuclear reactor emergency plans to address the

necessary provisions for coping with radiological emergencies at each facility in accordance with 10 CFR 50.54(q), Appendix E to 10 CFR 50, and for commercial nuclear power reactors only, 10 CFR 50.47(b). Reactor operators are required to train personnel and perform emergency preparedness exercises in order to test the adequacy of the plans, ensure personnel are familiar with their duties, and maintain response capabilities.

Some state and local regulations also require emergency response exercises. For example, the New Jersey TCPA, which incorporates the requirements of 40 CFR part 68, contains certain additional provisions imposed under state law, including a requirement for regulated facilities to perform at least one emergency response exercise per calendar year. Non-responding facilities are required to invite at least one outside responding agency designated in the emergency response plan to participate in the exercise, and employees of the facility are required to perform their assigned responsibilities for all emergency response exercises. Owners or operators of all other facilities are required to perform at least one full scale emergency response exercise in which the emergency response team as well as containment, mitigation, and monitoring equipment are deployed at a strength appropriate to demonstrate the adequacy and implementation of the plan.¹⁸⁸

In comments received from the Agency's recent RFI, the National Association of Superfund Amendments and Reauthorization Act (SARA) Title Three Program Officials (NASTTPO), which represents members of State Emergency Response Commissions (SERCs), Tribal Emergency Response Commissions (TERCs), and LEPCs, has encouraged EPA to require RMP facilities to conduct exercises that include local first responders and realistic accident scenarios.¹⁸⁹

In addition to specific Federal and state requirements for conducting exercises and the NASTTPO comments, industry guidelines recommend conducting exercises. The CCPS Guidelines for Risk Based Process Safety recommend periodically testing the adequacy of emergency response plans and level of preparedness of responders,

including contractors and local response agencies.¹⁹⁰

In the original proposed RMP rule (58 FR 54190, October 20, 1993), EPA had included within the emergency response program provisions a proposed requirement for regulated sources to conduct emergency exercises. In the final RMP rule (61 FR 31668, June 20, 1996), EPA decided not to finalize this requirement (and several other additional emergency response program provisions), for two reasons. First, the Agency decided to limit the emergency response program requirements to the minimum requirements contained in CAA section 112(r)(7) in order to avoid inconsistency with other emergency response planning regulations. Second, the Agency indicated that the additional requirements were already addressed in other Federal regulations and therefore, sources were already doing them. However, EPA's experience with implementing the RMP rule over nearly two decades, along with incidents such as those described above, indicate that many regulated sources do not regularly conduct emergency exercises that involve local response authorities. The Agency now believes that adding this provision to the regulation will likely reduce the severity of some accidents that do occur.

1. Proposed Exercise Program Requirements

In order to further improve coordination with community responders and ensure that both facility personnel and local responders have practice responding to accidental releases at RMP facilities, EPA is proposing to require most regulated facilities to perform exercises as an element of the emergency response program identified under subpart E. Proposed § 68.96 would require both responding and non-responding RMP facilities with any Program 2 or 3 process to perform emergency exercises.

a. Notification Exercises

EPA proposes a new paragraph § 68.96(a) to require facilities with any Program 2 or Program 3 process to annually perform an exercise of the source's emergency notification system. This exercise would include contacting the Federal, Tribal, state, and local public emergency response authorities, and other external responders that would respond to accidental releases at the source. The purpose of these notifications is to ensure facility

¹⁸⁶ CSB. April 2006. Investigation Report: Toxic Chemical Vapor Cloud Release, MFG Chemical, Inc., Dalton, Georgia, April 12, 2004. Report No. 2004-09-I-GA. http://www.csb.gov/assets/1/19/MFG_Report.pdf.

¹⁸⁷ USCG, EPA, and DOI. August 2002. National PREP Guidelines. http://www.au.af.mil/au/awc/awcgate/uscg/prep_gid.pdf.

¹⁸⁸ NJDEP, Title 7, Chapter 31 Toxic Catastrophe Prevention Act Program, Consolidated Rule Document, Section 7:31-5.2; http://www.state.nj.us/dep/rpp/brp/tcpa/downloads/conrulerev9_no%20fonts.pdf.

¹⁸⁹ Gablehouse, T. October 28, 2014. Comment No. EPA-HQ-OEM-2014-0328-0679 on Risk Management Program RFI, PDF pg 5-6, NASTTPO, Denver, CO.

¹⁹⁰ CCPS. 2007. Guidelines for Risk Based Process Safety. American Institute of Chemical Engineers, CCPS, NY, Wiley. pp. 513, 524-526, 538-540.

personnel understand how to initiate the notification system and to test the emergency contact information to ensure it is up-to-date. As part of the notification exercise, the individual making the notifications should clearly indicate that the call is part of an exercise to test the notification system. The owner or operator would be required to document these notification exercises and maintain a written record of each exercise conducted for a period of five years. The owner or operator would also be required to provide copies of the report to local response officials, and to make the report available to the public in accordance with §§ 68.205 and 68.210.

As non-responding facilities will rely on local authorities to respond to accidental releases at the source, EPA believes that the proposed facility notification exercises will be an important supplement to the existing requirement for local emergency plan exercises under EPCRA section 303(c)(9), which requires local emergency plans to include methods and schedules for exercising the plan. Responding facilities will be required to meet additional field and tabletop exercise requirements below, which in many cases will also involve the participation of local authorities. Notifications to Federal, state, and local officials conducted as part of the field or tabletop exercise may also serve to meet the annual notification exercise requirements provided that the owner or operator documents these notification exercises.

EPA is also proposing to modify § 68.95(a)(1)(i) to clarify that the emergency response program should include procedures for performing appropriate notifications to Federal and state emergency response agencies, as well as the public and local emergency response agencies, about accidental releases. This could include, for example, any required notifications to the National Response Center, as required by section 103(a) of CERCLA, and/or notifications to the SERC as required by section 304 of EPCRA.

b. Responding Facility Field and Tabletop Exercises

EPA is proposing a new paragraph § 68.96(b) to require responding facilities to develop and implement an emergency response exercise program that uses the emergency response plan required under § 68.95(a)(1). EPA is proposing to require two types of exercises—field exercises and tabletop exercises. The owner or operator would be required to coordinate with local public emergency response officials in

planning and conducting exercises, and invite local officials to participate in exercises. However, participation in an exercise by local responders is not required for a facility to comply with the exercise provisions.

i. Field Exercises

Field exercises involve the actual performance of emergency response functions during a simulated accidental release event. Field exercises involve mobilization of firefighters and/or hazardous materials response teams, activation of an incident command structure, deployment of response equipment, evacuation or sheltering of facility personnel as appropriate, and notification and mobilization of law enforcement, emergency medical, and other response personnel as determined by the scenario and the source's emergency response plan.¹⁹¹

Section 68.96(b)(1) would require the owner or operator to conduct an emergency response field exercise involving the simulated accidental release of a regulated substance at least once every five years and within one year of any accidental release meeting the criteria in § 68.42(a). If the facility is required to conduct a field exercise as a result of an RMP reportable accident, then this would effectively reset the timeframe for when the next five-year field exercise is due.

EPA is proposing that the scope of the field exercises would include tests of:

- Procedures for informing the public and the appropriate Federal, state, and local emergency response agencies about an accidental release;
- procedures and measures for emergency response after an accidental release of a regulated substance including evacuations and medical treatment;
- communications systems;
- mobilization of facility emergency response personnel;
- coordination with local emergency responders;
- equipment deployment, and
- other actions identified in the source's emergency response plan, as appropriate.

ii. Tabletop Exercises

Tabletop exercises are discussion-based exercises without the actual deployment of response equipment. During tabletop exercises, responders typically assemble in a meeting location and simulate procedural and communications steps for response to a simulated accidental release, as determined by the scenario and the source's emergency response plan.

In § 68.96(b)(2) EPA is proposing to require the owner or operator to annually conduct an emergency tabletop exercise involving the simulated accidental release of a regulated substance, except during years when field exercises are conducted. The scope of a tabletop exercise would include tests of:

- Procedures for informing the public and the appropriate Federal, state, and local emergency response agencies about an accidental release;
- procedures and measures for emergency response after an accidental release of a regulated substance including evacuations and medical treatment;
- identification of facility emergency response personnel and responsibilities;
- coordination with local emergency responders;
- procedures for the use of emergency response equipment, and other actions identified in the source's emergency response plan, as appropriate.

c. Exercise Reports & Program Updates

EPA is proposing in § 68.96(b)(3) to require the owner or operator to evaluate each exercise and prepare a written report within 90 days of the exercise. The report would include:

- A description of the exercise scenario;
- names and associations of each exercise participant;
- an evaluation of the results of the exercise including lessons learned;
- recommendations for improvement or revisions to the emergency exercise program and emergency response program; and
- a schedule to promptly address and resolve recommendations.

The report would also include an evaluation of the adequacy of coordination with local emergency response authorities, and other external responders, as appropriate. Section 68.96(b)(3) would also require the owner or operator to update the emergency exercise program and emergency response program at least annually, and more frequently if necessary to incorporate recommendations and lessons learned from emergency response exercises, incident investigations, or other available information. The owner or operator would also be required to provide schedules of exercises and copies of exercise reports to local response officials, and to make exercise reports available to the public in accordance with §§ 68.205 and 68.210. Exercise reports would be maintained for five years.

d. Updates to § 68.12 (General Requirements)

EPA is proposing to revise § 68.12 (General Requirements) to be consistent

¹⁹¹ EPA, May 1988. Guide to Exercises in Chemical Emergency Preparedness Programs, OSWER 88006.

with these proposed exercise requirements. EPA is proposing to revise the Program 2 and Program 3 requirements under § 68.12 by renumbering paragraph § 68.12(c)(4) as § 68.12(c)(5) (for Program 2) and § 68.12(d)(4) as § 68.12(d)(5) (for Program 3), adding a reference to exercise requirements, and correcting citations to subpart E.

EPA is aware that while not all facilities regulated under the RMP rule conduct emergency exercises, many do, and the Agency believes that exercises conducted in accordance with other Federal, state, or local requirements, or exercises conducted in conjunction with a facility's trade association membership or code of practice, etc., may be used to satisfy the new requirements to the extent those exercises address the specific regulatory provisions contained herein.

EPA seeks comment on this approach. Are there additional exercise provisions that EPA should consider to improve the ability of RMP facility personnel and local authorities to respond to accidental releases? Are annual exercises sufficient or should EPA consider alternative frequencies? What information regarding exercises would be most helpful to the public while maintaining a balance for security?" Some SERS expressed concern that local emergencies could force a facility to postpone an exercise. EPA seeks comments on how best to address emergency postponement and rescheduling of exercises. EPA also seeks comment on whether to eliminate the requirement for tabletop and field exercises.

2. Alternative Options

EPA considered two alternative approaches to requiring emergency exercises. The first alternative option would also require responding and non-responding facilities to conduct an annual emergency notification system exercise. However, under this option responding facilities would additionally be required to conduct only annual tabletop exercises; emergency field exercises would not be required. This alternative option would be a lower cost option for responding facilities, as field deployment of the source's equipment and personnel would not be required. However, it may also result in less realistic and less effective emergency exercises.

The second alternative approach considered by EPA would contain the same provisions for notification exercises as in the proposed option, but would require responding facilities to conduct field exercises annually,

instead of tabletop exercises. This approach would be similar to the New Jersey TCPA emergency exercise provisions, and provide for a comprehensive test of all systems under the emergency exercise program for responding facilities. However, the costs of this approach would be significantly higher than the proposed approach.

EPA seeks comment on these alternative approaches and whether there are any other alternative options that EPA should consider prior to issuing a final action.

VI. Information Availability Requirements

Ensuring that communities, local planners, local first responders, and the public have appropriate chemical facility hazard-related information is critical to the health and safety of the responders and the local community. Throughout the many public meetings and outreach efforts related to Executive Order 13650, LEPCs, first responders, and members of the public stated that chemical facility information and data-sharing efforts need significant improvement.¹⁹² Specifically, LEPCs and first responders want to have access to the most relevant chemical hazard and risk information for their needs, in a user-friendly format, to better support planning and preparedness efforts. Community residents, operators of community facilities (such as daycares and nursing homes) and organizations consistently noted that they need basic information regarding chemical risks at facilities, presented in a clear and consistent manner, so that they can effectively participate in preparedness and planning to address such issues as effective emergency notification procedures, evacuation, and sheltering in place. In response to these issues, EPA is proposing ways to enhance information sharing and collaboration between chemical facility owners and operators, tribal and local emergency planning committees, first responders, and the public, in a manner that balances security and proprietary considerations. Some public commenters responding to EPA's RMP RFI elaborated the need for more public access to information about the RMP facilities. The Center for Science and Democracy (CSD) stated that public access to information is key to enabling communities to hold facility owners and

¹⁹² Chemical Facility Safety and Security Working Group. May 2014. Executive Order 13650 Report to the President—Actions to Improve Chemical Facility Safety and Security—A Shared Commitment, pgs. 93–94. https://www.osha.gov/chemicalexecutiveorder/final_chemical_eo_status_report.pdf.

operators accountable for reducing risks as much as possible, and for being prepared should an accident occur. According to CSD, facility owners and operators should be responsible for ensuring that appropriate measures are in-place to handle an emergency and should be fully communicating with local authorities on the development of community emergency response plans that include chemical facilities.¹⁹³

NASTTPO requested EPA consider providing information on emergency planning and exercises, audit reports, and RMP Executive summaries that include information such as accident histories, and names of RMP-regulated substances.¹⁹⁴

Oklahoma Hazardous Materials Emergency Response Commission (OHMERC) also commented and requested posting of chemical information including an RMP summary along with Tier2 information on a company Web site at a minimum. They also requested making the following information available to LEPCs: The facility emergency response plan, accident history, along with OCA.¹⁹⁵

The MKOPSC stated that most of the information is already available online and from LEPCs and need not be provided on a Web site. But MKOPSC noted that LEPCs can utilize the information to understand the risk in the communities and involve local facilities, local officials, SERCs, local citizens and EPA to have dialogues to improve regulatory compliance and promote safety. MKOPSC also believes it is also important to let the public understand how the facilities address the hazard present in their community and keep the risk at or below the "acceptable level." When local citizens have adequate information and knowledge, facility owners and operators may be motivated to continuously improve their safety in response to community pressure and oversight.¹⁹⁶

CCHS noted that requiring facility owners or operators to make this information available on the company Web site would promote improved regulatory compliance, because the more willing a facility is to be open and

¹⁹³ CSD. October 20, 2014. Comment No. EPA-HQ-OEM-2014-0328-0424 on Risk Management Program RFI, pgs. 2–3.

¹⁹⁴ Gablehouse, T. October 28, 2014. Comment No. EPA-HQ-OEM-2014-0328-0679 on Risk Management Program RFI, PDF p. 2, 4, & 6, NASTTPO, Denver, CO.

¹⁹⁵ Elder, M., October 29, 2014. Comment No. EPA-HQ-OEM-2014-0328-0641 on Risk Management Program RFI, p. 3, OHMERC.

¹⁹⁶ MKOPSC. October 29, 2014. Comment No. EPA-HQ-OEM-2014-0328-0543 on Risk Management Program RFI, pgs. 162, 165.