

EMERGENCY RESPONSE REVIEW

Vici Cooperative, Vici, Oklahoma

FINAL REPORT, March 28, 2005

Steve Mason – EPA Region 6, Emergency Readiness Team
Response & Prevention Branch, 1445 Ross Avenue, Dallas, Texas

75202

214 / 665-2292 mason.steve@epa.gov



The Environmental Protection Agency (EPA) Region 6 is issuing this Emergency Response Review as part of its ongoing effort to protect human health and the environment by responding effectively to chemical accidents. Emergency Response Reviews are designed to:

- Review with a local community and state officials the response procedures and outcomes to a specific chemical accident, affecting that community;
- Share information about chemical response safety practices;
- Develop potential recommendations and lessons learned to more effectively respond to an accidental release in the future;
- Build cooperation among local, state, and federal government agencies.

Emergency Response Reviews are entirely voluntary and may include all local, state, and federal entities involved with the response, as well as the responsible party and their representatives.

This document does not substitute for EPA's regulations, nor is it a regulation itself. It cannot impose legally binding requirements on EPA, states, or the regulated community, and may not apply to a particular situation based upon circumstances. This guidance does not represent final agency action, and may change in the future, as appropriate.

SUMMARY OF INCIDENT

On the evening of September 24, 2004, a report of a potential ammonia release was reported to the Vici Fire Department, Vici, Oklahoma. The initial report was received at approximately 2210 hours.

Personnel from the Vici Fire Department, as well as the Sheriff's Department responded to the Vici Cooperative, where the ammonia was apparently originating.

After arrival of a Coop employee, it was determined that the release was coming from one of the nurse tanks located on scene. The tank was practically empty, and through further investigation, the facility believes the release was caused by a change in pressure.

Due to weather conditions (high humidity, no wind, cool temperatures), the released ammonia did not dissipate quickly, but remained in the area for awhile.

An employee from the Coop, as well as a Vici Fire Department member entered the fenced in yard, and closed the valve, stopping the release.

No evacuation or shelter in place was necessary, due to the limited amount of ammonia released, and no injuries were sustained as a result of the release.

A review of the incident was initiated by EPA through a request from the State of Oklahoma, and a review was conducted during the regular Dewey County LEPC meeting in Vici.

All attendees at the review agreed that the response was handle professionally and to the best of the capabilities of the local response officials.

Any additional information inquiries concerning this response should be directed to:

**Taunia Bozarth, Dewey County LEPC / Emergency Management, 580-328-5580 or
dcem@talogatv.com**

OBSERVATIONS / RECOMMENDATIONS

<p>Observation / Recommendation # 1</p>	<p>All local response organizations should review protocols based on the following:</p> <p>“Response teams to a disaster scene have a responsibility to first protect themselves and their team members. If you or your team is injured, not only are the number of victims increased, but the response is now delayed, resulting in additional resource utilization. This delay and need for additional resources due to your inability to keep yourself and your team protected could cost other victims their lives.</p> <p style="text-align: center;">DISASTER Paradigm: Safety and Security</p> <p>Don't be selfish - protect yourself. Scene priorities:</p> <ul style="list-style-type: none"> ● Protect yourself and your team members first ● Protect the public ● Protect the patients ● Protect the environment <p style="text-align: right;"><u>"Basic Disaster Life Support Manual, Version 2.5"</u></p> <p>At an incident, safety should be the first concern of any responder. When fire fighters, police officers or emergency medical technicians become injured or contaminated, they become part of the problem, instead of a solution. It's unfair to ask first responders to risk their life, health, or the health of their families by becoming contaminated at an incident. Difficult decisions need to be made and risks taken should be weighed against the possibility of a positive outcome.</p> <ul style="list-style-type: none"> ● OSHA 29 CFR 1910.120 -- Hazardous Waste Operations and Emergency Response (HAZWOPER) ● OSHA 29CFR 1910.134 -- Respiratory Protection (Commonly referred to in the fire service as the Two In/Two Out Rule) ● EPA 40 CFR 311 -- Worker Protection ● NFPA 471 -- Recommended Practice For Responding to Hazardous Materials Incidents ● NFPA 472 -- Professional Competence of Responders to Hazardous Materials Incidents ● NFPA 473 -- Competencies for Emergency Medical Personnel Responding to Hazardous Materials Incidents ● NFPA 1500 -- Standard on Fire Department Occupational Safety and Health Program
<p>Observation / Recommendation # 2</p>	<p>Local governments that respond to hazardous materials emergencies should always be aware of the potential for reimbursement under the Local Government Reimbursement program, operated through EPA. More information on this program can be found at:</p> <p>www.epa.gov/region6/lepc</p>

Observation / Recommendation # 3	Response Organizations within Dewey County should ensure they have the 24 hour phone numbers for both EPA Region 6 (866-372-7745) and ODEQ (800-522-0206), as well as the phone number for the National Response Center (NRC 800-424-8802), and CHEMTREC (800-424-9300).
Observation / Recommendation # 4	<p>Anyone who responds to a hazardous materials incident should receive at least operations level HAZMAT training. All other individuals involved in the incident, including dispatchers, should be trained to a minimum of the awareness level.</p> <p>Awareness level training teaches you to recognize, identify, notify the proper authorities and to isolate an incident. All levels of HAZMAT training are required to have annual updates that demonstrate competencies.</p> <p>The Dewey County LEPC should work to obtain hazardous materials awareness, as well as basic Incident Command System (ICS), training for response personnel within the County who have not already received this training.</p>
Observation / Recommendation # 5	The Dewey County LEPC and Dewey County Emergency Management should review the emergency response plan developed by the Cooperative under the Clean Air Act, Risk Management Program. This review will ensure that local officials are aware of the response capabilities and intentions of the facility during an emergency release.
Observation / Recommendation # 6	Since ammonia is so prevalent within the county, the Dewey County LEPC may want to set up additional ammonia workshops for personnel within the County who have not attended previously conducted workshops. Throughout Region 6, emergency response personnel are more often injured from ammonia releases than any other hazardous substance.
Observation / Recommendation # 7	The Dewey County LEPC should review with all facilities within the County the proper reporting for accidental releases to the local and state officials, as well as the National Response Center. This review should also ensure that facility personnel can be contacted by local officials during an emergency.

Observation / Recommendation # 8	Community response personnel must ensure that all non-response personnel are prevented from driving through restricted areas, particularly areas impacted by a plume. This not only protects the citizens, but provides better safety for response personnel.
Observation / Recommendation # 9	With limited response equipment for extremely hazardous substances, the Dewey County LEPC should review with local officials the response procedures to be followed in the event of a catastrophic release of ammonia within the County. This type of release would necessitate a much different response strategy than the minor release that did occur.
Observation / Recommendation # 10	Dewey County has worked hard to maintain an active LEPC. EPA Region 6, as well as the State of Oklahoma, appreciates this effort. The LEPC should be aware of the State and EPA assistance programs to ensure future success.

Each of the emergency response reviews conducted within Region 6 show one consistent pattern: Emergency response personnel within Region 6 are to be commended for their professionalism and sincere desire to protect the citizens of their communities.

Region 6 EPA is grateful for the efforts made by all emergency response personnel, and hopes the above recommendations can be used to improve the response and preparedness readiness of a community, if a future emergency occurs.