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REGION 6 LEPC Update

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This month, we provide a letter written to SERCs by the EPA Office of Emergency Management. We also re-issue a fact sheet we first provided in 1999 concerning the necessity of using multiple sources of information during a response. Since LEPCs are constantly changing, we felt it was time to republish this important message. We also have an entertaining article from Fred Cowie on a fresh look at emergency preparedness.

As always, if you received this Update from someone else, and would like to be added to the email list, just email us at one of the emails above.

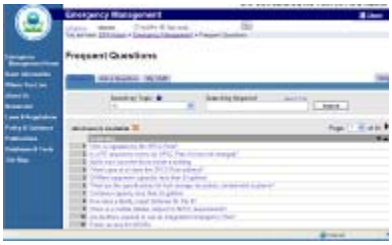
Steve & Angie

EPCRA / RMP / Oil Pollution Frequently Asked Questions

On September 9, 2009, the Office of Emergency Management (OEM) EPA Headquarters launched its Frequent Questions Database on our website for use by the general public.

You can search this new database for frequently asked questions about EPCRA, RMP, and Oil Pollution Prevention (which includes oil discharge regulations, SPCC, and FRP). In addition, you can submit your own question if you do not find a similar one (with an answer) in the Database.

We have not changed data currently available on the website; however, with this application we are making our site more user - friendly for customers searching for specific information.



We are working hard to meet our users' needs through our website and hope they will find the Frequent Questions Database helpful.

As always, we welcome your comments and suggestions for improving the OEM website.

A link to the tool is available on the OEM website, under the heading View Frequent Questions / Ask a Question, at: http://emergencymanagement.custhelp.com.

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Voluntary Guidelines for Methamphetamine Laboratory Cleanup

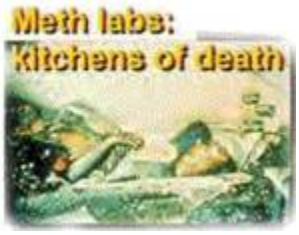
The Voluntary Guidelines for Methamphetamine Laboratory Cleanup provides technical guidance for state and local personnel responsible for methamphetamine (meth) lab cleanup.

The Guidelines are based on an extensive review of the best available science and practices and addresses general cleanup activities, identifies best practices for specific items or materials, discusses sampling procedures, and provides additional technical resources.

The Methamphetamine Remediation Research Act of 2007 required EPA to develop these guidelines, based on the best currently available knowledge in the field of meth lab remediation.

EPA reviewed state guidance and regulations to develop these voluntary guidelines.

In addition, this document has received extensive review and refinement from a broad array of stakeholders as well as focused feedback from nationally-recognized experts in meth lab remediation.



Why is EPA publishing these voluntary guidelines?

This document provides those guidelines for States and local agencies to improve "our national understanding of identifying the point at which former methamphetamine laboratories become clean enough to inhabit again."

The legislation also required that EPA periodically update the guidelines, as appropriate, to reflect the best available knowledge and research.

Who should use these guidelines?

The guidelines are geared towards state and local government personnel charged with remediating or otherwise addressing former methamphetamine (meth) labs. This document helps disseminate the best available knowledge and research on meth lab remediation and will also prove useful to cleanup contractors and could be a resource for homeowners.

Does this document create new regulations for meth lab cleanup?

EPA prepared this document based on best current practices to provide voluntary cleanup guidelines to state and local governments, cleanup contractors, industrial hygienists, policy makers and others involved in meth lab remediation.

It does not set requirements, but rather suggests a way of approaching meth lab remediation. Those using this document should also consult their appropriate municipal, county or state guidance documents, regulations and statutes.

This document is not meant to supersede municipal, county or state guidance documents, regulations or statutes (however this document may be useful as they develop and/or review and revise their own guidelines).

The document can be found at: *http://www.epa.gov/oem/meth_lab_guidelines.pdf*

Letter to State Emergency Response Commissions (SERCs) from EPA HQ

CEPPO

This letter is to bring you up to date on recent activities in EPA's Office of Emergency Management (OEM) as they relate to your implementation of the Emergency Planning and Community Right-to-Know Act (EPCRA). OEM was formed in 2004 by joining the Chemical Emergency Preparedness and Prevention Office (CEPPO) with the Superfund Emergency Response Program and EPA's Oil Spill Prevention Program.

It has taken time to integrate the various functions of these programs, but I think we are succeeding in strengthening emergency preparedness and accident prevention for both chemicals and oil, while maintaining an excellent emergency response and removal program.

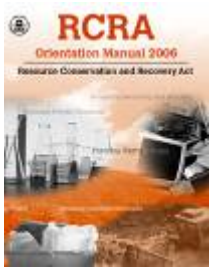
It is clear to me, as we come to the end of the first decade of the 21st century, that the EPCRA and Risk Management Program (RMP) implementation has matured, sometimes in ways we never anticipated. In the years after September 11, 2001, and the establishment of the U.S. Department of Homeland Security, we have noticed a new interest in information available under both EPCRA and RMP.

There is a constant underlying effort to ensure that potential terrorists do not gain access to chemical inventory information, but Federal, State, and local agencies are also finding the right-to-know information helpful as they develop their own preparedness and security measures. In addition, we found that following the tragic Hurricane Katrina, the Midwest floods, and other natural disasters, the information available under EPCRA and RMP was of significant help to responders charged with preventing deaths and injuries due to accidental chemical releases.

I also realize that there have been changes in structure and personnel at the State and local levels. Many people who very successfully initiated EPCRA implementation have retired or moved on to new challenges. So I know that we at EPA need to continually provide guidance and technical assistance related to EPCRA and RMP because many of you and many LEPC members are new to the programs.

From the first days of EPCRA in 1986, we saw this legislation as primarily a State program with the State Emergency Response Commission (SERC) directing the work of Local Emergency Planning Committees (LEPCs). EPA headquarters' responsibility was to develop regulations and guidance to assist you. Our Regional offices were to be EPA's front line for direct contact with you and providing the technical assistance you requested.

In fact, I believe that one of the most noteworthy things that EPA currently implements are the SERC and LEPC conferences organized by many of our Regional offices. If you have the opportunity, I urge you and your LEPCs to participate in any of those conferences. For my part, I will encourage all our Regions to support these conferences. Looking to the future, we at EPA continue to see our roles in such a cascading fashion, from HQs to the Regions, to the States, and through you to the LEPCs.



Providing Information about Chemicals at Resource Conservation and Recovery (RCRA) Sites.

You are probably familiar with the accident investigations and related work conducted by the U. S. Chemical Safety and Hazard Investigation Board (CSB). I would like to draw your attention to the excellent videos developed by CSB (http://www.chemsafety.gov/). You may find these videos to be useful training tools for LEPCs. In October 2006, a fire at Environmental Quality Company's (EQ) hazardous waste storage facility in Apex, North Carolina, resulted in approximately 16,000 residents being evacuated for two days, 30 people needing medical attention, and the hazardous waste building being completely destroyed.

The CSB investigated the incident and published a case study in April 2008 (www.csb.gov/assets/document/EQFinalReport.pdf). CSB found that local emergency responders did not have complete and accurate information on the types and quantities of hazardous chemicals present at the EQ Company.

You may be aware that hazardous wastes regulated under RCRA are exempt from the hazardous chemical inventory reporting requirements of sections 311 and 312 of EPCRA.

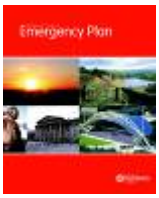
Further, while RCRA-permitted hazardous waste treatment, storage and disposal (TSD) facilities must attempt to make planning arrangements with local authorities as appropriate for the types of wastes handled, in many cases there is no requirement that this information be updated over the term of the permit. In such situations, local emergency planners and responders may not have complete and accurate chemical hazard information for TSD facilities. Noting this gap in emergency planning information, the CSB case study recommended that EPA:

Ensure that the emergency response planning required for permitted hazardous waste treatment, storage, and disposal facilities (40 CFR 264.37) includes providing written information to state and local emergency response officials on the type, approximate quantities, and locations of materials within the facility (similar to reporting requirements of the Emergency Planning and Community Right-to-Know Act). Additionally, ensure that permit holders periodically update this information throughout the ten-year permit period. (2007-01-I-NC-R1, page 12)

EPA responded to CSB in October 2008, indicating that while EPCRA does not give EPA the authority to require TSD facilities to provide chemical inventory information for RCRA-regulated hazardous wastes to State and local officials, State Governors and SERCs do have such authority under sections 302 and 303 of EPCRA, and that EPA would encourage Governors or SERCs to use this authority as appropriate.

Under Section 302, a facility owner or operator is required to provide emergency planning notification to the SERC and the LEPC if the facility has any extremely hazardous substance (EHS) present above the threshold planning quantity (TPQ) for that substance. Even if there are no EHSs present at a facility, Section 302(b)(2) of EPCRA authorizes the Governor or the SERC to designate additional facilities which shall be subject to the emergency planning requirements, if such designation is made after public notice and opportunity for comment.

Once these facilities have been so designated, under Section 303, the LEPC may request the facility owner or operator to provide information necessary for developing and implementing the community emergency plan. Although the RCRA-regulated hazardous wastes at such designated facilities would still be exempt from the specific chemical inventory reporting requirements of Sections 311 and 312, the LEPC could use its authority under section 303 to obtain substantially equivalent information if the LEPC decided that, for example, annually updated chemical inventory information was necessary for development and maintenance of its community emergency plan.



With this letter, I am asking you to review whether RCRA-regulated hazardous waste TSD facilities in your State are subject to appropriate emergency planning requirements under State laws and regulations. If these regulations do not exist, I ask you to consider using your authority under sections 302 and 303 of EPCRA to ensure that State and local emergency officials receive all necessary emergency planning and response information for such facilities.

Assessing Program Effectiveness.

For 20 years EPA has worked with the Organization for Economic Cooperation and Development's (OECD's) Chemical Accidents Programme to share best practices to prevent chemical accidents and to prepare for incidents if, unfortunately, they do occur. OECD recently published the revised Guiding Principles for Chemical Accident Prevention, Preparedness and Response, which incorporates the lessons learned and best practices from these efforts.

One lesson from this cooperative work is that national and local authorities, industry and other stakeholders must regularly assess their progress in chemical safety. With this in mind, OECD has recently published two complementary guidance documents, OECD Guidance on Developing Safety Performance Indicators for Industry and OECD Guidance on Developing Safety Performance Indicators for Public Authorities and Communities/Public.

You can download these documents from:
http://www.oecd.org/document/45/0,3343,en_2649_34369_32425389_1_1_1_1,00.html

I think it would be beneficial for several SERCs and/or LEPCs to establish measurement programs using the OECD guidance. Please consider this effort or identify one or more of the LEPCs in your State; we will work with the volunteers to implement the program and to share results. You can contact Kathy Jones on my staff to become an SPI participant (jones.kathy@epa.gov, 202-564-8353).

LEPC Survey.

Just a year ago we conducted an electronic LEPC survey. We had email addresses for approximately 2600 LEPCs and 939 LEPCs responded to the survey. You can find a report on this LEPC Survey at: **www.epa.gov/emergencies/docs/chem/2008_lepcsurv.pdf**.

I found several interesting results in the survey. For example, 77% of the responding LEPCs address terrorism in their plans, 70% receive Tier II information in paper format, and half use CAMEO.

In addition, the LEPCs tend not to use our OEM website very much, and they requested EPA assistance with outreach tools to educate new or potential LEPC members as well as members of the general public. Several LEPC coordinators also requested that EPA develop a compendium of LEPC best practices or operational guidance both to assist newly forming LEPCs and to provide ideas for improvement of existing LEPCs. My staff will be working to address these requests.

EPCRA Regulations.

There have been several recent changes to the EPCRA regulations. They are listed on our website. One change (the CERCLA/EPCRA administrative reporting exemption for air releases of hazardous substances from animal waste at farms) created a good deal of interest and confusion in the agricultural community. Many people thought that this was a new regulation with new requirements, not noticing that it actually provided exemptions to the reporting requirements.

The fact sheet at **http://www.epa.gov/emergencies/docs/chem/CAFO_rule_fact_sheet.pdf** should be helpful for those who would like additional information.

With biofuels becoming more prevalent at retail gas stations, we have recently received a number of questions related to the reporting of these alternative fuels. Therefore, we want to take this opportunity to provide you with a clarification.

The general threshold for reporting under EPCRA section 311 and 312 is 10,000 pounds, except for gasoline and diesel fuel where the threshold is 75,000 and 100,000 gallons, respectively. However, this higher threshold is not applicable to alternative fuels containing more than 10% of ethanol.

Those fuels are reportable at the lower 10,000 pounds threshold. We will be developing a short document on this issue for use by SERCs, LEPCs and others to educate people who handle these fuels; watch our website for news about this.

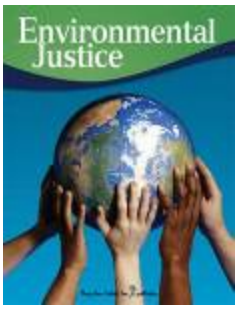
CAMEO.

Many years ago we developed the CAMEO software program to help LEPCs in their planning and information management functions. We continue to improve and maintain the various CAMEO functions and we make it available free of charge from our website. Visit **www.epa.gov/emergencies/content/cameo/index.htm** to find a link to the most recent CAMEO, MARPLOT, and ALOHA. On the same page you can find links to training courses and user groups.

RMP*eSubmit.

There has been a great deal of recent activity in the RMP program. Specifically, we have introduced new software, RMP*eSubmit, to enable facilities to submit RMPs electronically with electronic signature. So far, the system is working very well. You can get the details at http://www.epa.gov/emergencies/content/rmp/rmp_esubmit.htm. This information is primarily intended for the regulated community but you and the LEPCs might want to read about it.

Environmental Justice.



I encourage you and your LEPCs to promote environmental justice utilizing right-to-know information about chemicals in the community. There is ample evidence that hazardous chemicals are often stored and used near neighborhoods of low income and culturally diverse citizens. LEPCs can use the MARPLOT function of CAMEO to identify environmental justice communities in their planning area. One possible activity would be to develop outreach materials in several languages. Thirty-six percent of those responding to the LEPC survey indicated their emergency response plan takes into account environmental justice considerations. Please let us know of your successes in promoting environmental justice in your communities so that we can share the information with people throughout the country.

Citizen Corps.

There are several Federal activities that reach into States and communities and might involve the same people who serve on LEPCs. For example, FEMA coordinates the Citizen Corps at the national level. We are aware that many LEPCs are already fully merged with the Citizen Corps and that many SERCs recommended such mergers. Citizen Corps is the component of USA Freedom Corps that creates opportunities for individuals to volunteer to help their communities prepare for and respond to emergencies.

citizen corps

At the local level, Citizen Corps initiatives are carried out by Citizen Corps Councils. Currently, there are about 2,300 County/Local/Tribal Citizen Corps Councils across the country. One quarter of the respondents to the LEPC Survey indicated that the LEPC and Citizen Corps Council were merged. Several LEPCs said that merging with their Citizen Corps Council resulted in increased interest and meeting attendance as well as the incorporation of all-hazards planning.

I suggest that you and your LEPCs consider whether working more closely with the Citizen Corps could make your EPCRA and RMP work more effective. Additional information on Citizen Corps can be obtained at **http://www.citizencorps.gov/**.

OEM Website.

As you surely know, maintaining a current website is a major task. We are currently updating the content of our website (**http://www.epa.gov/emergencies/**) to remove dated material, as well as to provide current information. We are using the "Highlights" column at the right of the home page to list what is noteworthy.

A small yellow icon with the word "NEW" should catch the eye of our frequent visitors. For several years we have provided a list serve to keep our government partners and industry aware of new information. I urge you and your LEPCs to use the link to the list serve on our home page.

LEPC Contact List.

With respect to our website, we need your help to keep our contact list up to date.

If you visit **http://yosemite.epa.gov/oswer/lepcdb.nsf/HomePage?openForm**, you can use the Search Tool or click on your State and find the information we currently have for your LEPCs. We ask that you and/or your LEPCs notify us or your EPA Regional contact of any changes.

At a recent meeting of the National Association of SARA Title Three Program Officials (NASTTPO), attendees had diverse views on how this data may be best maintained in the future.

The views ranged from States providing periodic updates to EPA, to relying on links to State Web sites rather than posting actual LEPC data on our Web site. We think it is important that this contact information is available on the Internet so that citizens know who they can contact regarding chemical safety in their communities. Therefore, we would appreciate hearing your views on a future process for maintaining this data. Please send your suggestions and preferences to our webmaster, Dana Robinson (robinson.dana@epa.gov).

Finally, OEM is now actively participating in EPA's Community Action for a Renewed Environment (CARE) program (**www.epa.gov/CARE**); there is a link to CARE on the OEM website. CARE has a grant program that could prove helpful to LEPCs. If you or your LEPCs are interested in seeking a grant, please be in touch with our EPA Regional contacts for the EPCRA program (**www.epa.gov/emergencies/content/regional.htm**) or with Bill Finan on my staff (finan.bill@epa.gov, 202-564-7981). Bill will coordinate with the Regional contacts.

As I said earlier, I believe that the implementation of EPCRA and RMP has significantly improved chemical safety in our country. Thank you and your LEPCs for all the work you have done. We look forward to hearing from you and/or your LEPCs regarding their updated LEPC contact information, interest in measuring program effectiveness using the Safety Performance Indicators Guidance, success with incorporating environmental justice into planning and your efforts in utilizing your authority to acquire information related to RCRA regulated facilities and the threats that they may pose to your LEPC communities.

If EPA can be of any assistance to you, please contact your EPA Regional contacts at http://www.epa.gov/emergencies/content/regional.htm. You can also contact me at dietrich.debbie@epa.gov, 202-564-8600.

Sincerely,
Deborah Y. Dietrich
Director, Office of Emergency Management

Use Multiple Data Sources for Safer Emergency Response

The Environmental Protection Agency (EPA) is issuing this Alert as part of its ongoing effort to protect human health and the environment by preventing chemical accidents. EPA is striving to learn the causes and contributing factors associated with chemical accidents and to prevent their recurrence. Major chemical accidents cannot be prevented solely through command and control regulatory requirements.

Rather, understanding the fundamental root causes, widely disseminating the lessons learned, and integrating these lessons learned into safe operations is also required. EPA publishes Alerts to increase awareness of possible hazards. It is important that facilities, SERCs, LEPCs, emergency responders and others review this information and take appropriate steps to minimize risk.

PROBLEM

A critical consideration when choosing a response strategy is the safety of emergency responders. Adequate information about on-site chemicals can make a big difference when choosing a safe response strategy.

This information must include: name, toxicity, physical and chemical characteristics, fire and reactivity hazards, emergency response procedures, spill control, and protective equipment.

Generally, responders rely primarily on Material Safety Data Sheets (MSDSs) maintained at the facility. However, MSDSs may not provide sufficient information to effectively and safely respond to accidental releases. This Alert is designed to increase awareness of MSDS limitations, so that first responders can take proper precautions, and identify additional sources of chemical information, which could help prevent death or injury.

ACCIDENTS

In May 1997, a massive explosion and fire occurred at an agricultural chemical packaging facility in eastern Arkansas. Prior to the explosion, employees observed smoke in a back warehouse and evacuated.

The facility called local responders and asked for help to control smoldering inside a pesticide container. The local fire department rapidly responded and reviewed the smoldering product's MSDS. The MSDS lacked information on decomposition temperatures or explosion hazards.

The firefighters decided to investigate the building. While they were approaching, a violent explosion occurred. Fragments from a collapsing cinder block wall killed three fire fighters and seriously injured a fourth.

In April 1995, an explosion and fire at a manufacturing facility in Lodi, New Jersey caused the death of five responders. The explosion occurred while the company was blending aluminum powder, sodium hydrosulfite, and other ingredients. Even though the material was water reactive, the MSDS for the product advised the use of a "water spray... to extinguish fire." The recommendation in the MSDS for "small fires" was to flood with water; however, "small fire" was not defined, the amount of water necessary was not specified, and no information dealt with how to respond to large fires (which can occur during blending processes).

The MSDS ONLY described the hazards associated with the product. In this case, responders needed information on the hazards associated with the reactivity during the blending process (which was significantly different from the product). Emergency responders should note that the chemical information provided on an MSDS usually presents the hazards associated with that particular product. Once the product is placed in a process some factors may change, resulting in the increase/decrease, or elimination of hazards. These factors may include reactions with other chemicals and changes in temperature, pressure, and physical/chemical characteristics.

MSDSs in the WORKPLACE

In 1988, OSHA required facilities storing or using hazardous chemicals to comply with the Hazard Communication Standard. This standard requires employers to provide employees with an MSDS for every hazardous chemical present onsite, and to train those employees to properly recognize the hazards of the chemicals and to handle them safely.

OSHA requires that MSDSs include:

- Chemical identity (product by chemical and common names);
- Chemical and common names of all hazardous ingredients;
- Physical and chemical characteristics (such as vapor pressure, flash, boiling or freezing points);
- Fire and explosion hazards; Reactivity hazards (how will the chemical react with other chemicals, air, or water);
- Health hazards (acute and chronic, symptoms of exposure);
- Precautions for safe handling; and
- Control measures.

The MSDS also must include the name and telephone number of the individual who can provide additional information on appropriate emergency procedures.

MSDSs normally provide information on the physical/chemical characteristics and first aid procedures. This information is valuable for employees to safely work with the chemical. However, the content for MSDSs on response procedures, fire, and reactive hazards may be insufficient for responder use in an emergency. Vagueness, jargon, understandability, product vs. process concerns, and missing information on an MSDS may increase the risk to emergency responders.

MSDSs are provided by manufacturers, importers and/or distributors. MSDS chemical hazard information can vary substantially depending on the provider. Sometimes this discrepancy is due to different testing procedures. However, whoever prepared the MSDS is responsible for assuring the accuracy of the hazard information. The following chart summarizes information from various MSDSs for the chemical azinphos methyl and it illustrates how different sources can provide varied and conflicting information. Information from the CAMEO Response Information Data Sheets (RIDS) also is provided.

Comparison of MSDS Data for Azinphos Methyl - AZM (CAS NO. 86-50-0)

	MSDS – A	MSDS – B	MSDS - C	MSDS - D	CAMEO RIDS
Hazard ratings	Health - 2 Flammability - 0 Reactivity – 0	None listed	Health - 3 Fire - 2 Reactivity – 2	Health - 4 Flammability - 0 Reactivity - 0	Health - 3 Fire – 2 Reactivity – 2
Reactivity Hazards	Stable under normal conditions Hazardous polymerization will not occur	Depends on characteristics of dust; decomposes under influence of acids and bases	Stable material. Unstable above 100F . Hazardous polymerization will not occur	Releases toxic, corrosive, flammable or explosive gases Polymerization will not occur	Will decompose

Incompatibility	High temperatures, oxidizers, alkaline substances	Acids and bases	Heat, moisture	Heat, flames, sparks, and other ignition sources	Heat, UV light
Fire Hazards	Vapors from fire are hazardous	Combustible. Gives off irritating or toxic fumes (or gases) in a fire	Decomposes above 130F with gas evolution and dense smoke. Explosion hazard for large dust cloud	Containers may rupture or explode if exposed to heat	Decomposes giving off ammonia, hydrogen and CO

INFORMATION SOURCES FOR FIRST RESPONDERS

Many established fire department hazardous materials teams follow the "Rule of Three", which requires that three sources of information should be consulted before a response decision is made. Listed below are resources available to help first responders plan the Rule of Three. This is not a comprehensive list, but rather, a starting point.

- Chemical Inventories -Chemical inventory records filed by the facilities in their jurisdiction under EPCRA for basic hazard and storage information. It is a good practice to gather information from various sources on the hazards and proper response for those chemicals. This information can be used to enhance response procedures between local officials and facilities. Newly required RMP information provided by facilities will provide local responders with process and chemical hazards and facility-specific response information.

- Assistance From Others - Emergency personnel and local officials have several avenues to obtain additional information about chemical hazards and proper response options in an emergency. It is essential that local response and planning officials know what these resources are and how to obtain them quickly and effectively. One of the key elements is the ability of the responders to correctly interpret available data. Most are not chemists nor health professionals. Many of the resources listed below can help with these interpretations.

- Training - Local officials should ensure that all responders have sufficient training in hazardous materials response. The NFPA 472 Standard on Professional Competence of Responders to Hazardous Materials Incidents specifies minimum competencies. State Fire Training Academies and State Emergency Management Offices can provide more information on training. This training will form a foundation to better understand chemical information.

- Pre-planning with facilities that store or use hazardous materials is critical to local officials and helps to identify specific concerns for each facility and opportunities to prepare effectively for those concerns, or to reduce existing risks. Sufficient and correct information regarding responders and the community they are chemicals in an accidental release may make the protecting. difference between a successful emergency response and a potential disaster for local responders and the community they are protecting.

Ten Steps to Realistic Local Preparedness

© 2009 Frederick J. Cowie, Ph.D. fredcowie@aol.com fredcowie.com 406-431-3531

I am as guilty as anyone of being tired of planning, preparing, and training. After all, we've all been doing this for decades. Right? Some of us had lost our edge, then—POOF! Along comes an eye opener: an incident; a newspaper article; a TV segment; or perhaps, like it was for me, just something someone says in class. Oh yeah, this stuff is important, critical. It's about safety and health. It's about moms and dads, kids and grandparents. It's about life. Life safety. It really, really, is important.

For me my rebirth took place in a small class in a small town. A mining town. Now it could have been a paper mill town, a grain elevator town, a tanning town, a refinery town, or any other kind of one-or-two-or-three-industry town, this just happened to be a mining town. The next town over was a mining town too. And up the way, more mines, more towns. Down the road, more industries, more industry towns.

The economic reality of such a town is that the average miner wage is high for jobs out west, let's just say $50,000 per year for ease of computation. If the mine has one hundred employees, that's five million in gross salaries, great for a small town. Then add on all the other benefits of taxes for schools, etc., and it is really, really great for a small town. So, all things considered, few people rock that quite substantial economic boat. Sure, there are chemicals, but that's spelled M-O-N-E-Y!

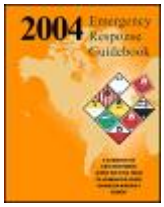
So when I asked "What do you have up there besides diesel?" there was some hesitation, a pregnant pause as it were, and then someone mentioned sodium hydrosulfide. I thought he said sodium isosufide and tried to write out the formula but was stumped, so I hesitated. When I asked what it was used for the answer was something like "processing copper ore." Not a lot of discussion.

Till break. Then the group of mine workers huddled and talked turkey. It came out that another mine or two had spills—maybe a hose broke or a connection disconnected—and the employees were sprayed, the pressure knocked off eye protection, and employees went blind.

Now, that's scary enough for me. Obviously the standard practice and protection wasn't enough, obviously. But I found it hard to get a lot more discussion going. Bosses, liability, company policy, good paying jobs, and all.

Not wanting to let this pass—for it is we trainers who must push the safety buttons—I have thought about what I had learned over decades and what I had learned recently after talking to miners, health and safety officers, responders, and chemists about the above issue. I have a few things to say that might make things a bit safer out there, so here they are.

1. Each town has a community response team to use to keep their community safer. For example, by "community response team" in a mining town I mean: the mine safety, health, and rescue folks; the fire fighters who will respond; the EMTs will respond; the law enforcement officers who might respond; the emergency room/clinic personnel who will receive the patients; and anyone else who might be involved in an incident—PIOs, pharmacists, Red Cross volunteers, etc.

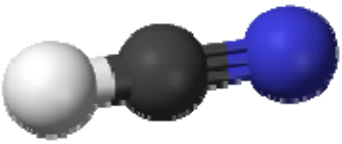


2. Each town has its list of baseline, normal, hometown chemicals found in almost all towns: gasoline, diesel, LPG, pesticides, anhydrous ammonia, etc.

   These should be the base chemicals used in training and planning for an appropriate hazmat response—for the entire community response team. The standard is the orange guide, the USDOT ERG, the hazard classes, the numbered response guides.

3. Each town has a list of industry-specific chemicals related to their hometown industries and businesses. For example, those used by paper mills, electroplating shops, etc. In our case, the local mine. More specifically, NaHS, sodium hydrosulfide, used in the flotation process at a copper mine. And, perhaps, NaCN, the basis of most gold mine cyanide leaching operations. Or perhaps, HF, the hydrofluoric acid used in refineries and glass etching industries. Remember, you have the SARA Title III/EPCRA "community right to know," or right to find out if you don't know.

4. Simple logic demands site-specific and chemical-specific planning in relation to things like NaHS, NaCN, and HF. EAPs, if you will, Emergency Action Plans. The first two are not "just bases" and the third is not "just an acid." If the processes using NaHS and NaCN are not kept basic enough, say over pH of 12, or if acids are accidentally introduced—even in the waste system—then things can go south, and any localized H+ ions can turn those bases into gaseous H2S and HCN, which are both killers.



(That doesn't mean the corrosiveness of these chemicals is to be ignored, for eyesight has been lost, it just means there is both corrosiveness and other problems). And HF is not just an acid, nor not even just what class participants call a "bone eater." No, it will bond with the calcium ions which keep your heart pumping and, oops, you're dead!

5. These are important things to know. Specific things. About specific chemicals. At specific sites. Not just for the employees.

   Not just for the industry safety, health and rescue folks. But for the entire community response team. And for the general public. Not to scare. Not to incite animosity.

   But just for common sense safety sake.

As emergency managers, ones who emphasize the hazmat perspective, we see things that need fixin'. The problem is, we are not specialists; we are not experts; and our job is not to fix anything ourselves.

So, what can we do?

We can do what Rowdy Yates (Clint Eastwood in the TV show Rawhide to the younger crowd) would do, bring the herd in.

Have all the interested parties (from the mine folks, to the firefighters and EMTs, to the cops and Red Cross volunteers, to the ER and clinic medical personnel) all look at the MSDSs and the printouts from online sources such as the 2004 CSB (Chemical Safety Board) paper on NaHS, sodium hydrosulfide, and discuss the entire incident scenario, from the chemical process and hose break at the mine to the release of the patient from the medical facility.

What can be done better with relation to prevention, non-contamination, de-contamination, rumor control, panic mediation, etc.

At each link in the chain, someone knows something that people at other links need to know.

ER personnel might know a whole lot more about toxins, while industry personnel might know considerably more about site plans and piping systems.

Simply stated, we need to act more like teams, and less like a series of sequentialized-body-handlers.

Good. Now that I've said that, I can sleep better. I hope you will be able to too!

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

Region 6 Emergency Notification Numbers

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