



Region 6 Chemical Facility Safety and Security Workgroup

Quarterly Update – February, 2015

1. What SOPs have you identified that the Regional working group needs to develop? Please list them.

The Region 6 workgroup has developed a list of eight (8) SOPs for the workgroup to draft and finalize.

- 1) **Administration of the Workgroup:** This SOP establishes the administration of the workgroup, including reports, working with the Region 6 RRT, and implementation of the SOPs developed by the workgroup. If implementation or development of an SOP would include the RRT, the workgroup will submit the proposal to the RRT, to follow the established RRT process. The SOP will describe how the workgroup and SOPs will be sustained.
- 2) **Incident Commander Standard for Senior Fire Department Personnel / HAZMAT Training for First Responders:** This SOP develops efforts to coordinate with State Training Officers, as well as State training academies (TEEX, LSU, OSU, etc) to help in ensuring local response officials have the appropriate ICS/NIMS training (ICS 100, 200 and NIMS 700, 800), as well as advanced ICS training programs. Additionally, the SOP will describe efforts to coordinate with federal and state partners to work toward ensuring responders have the appropriate level of HAZMAT training for the position and duties they occupy. This will include outreach on the Region 6 HAZWOPER Awareness training, and the Region 2 Chemical Safety training, as well as ensuring responders understand the OSHA 29 CFR 1910.120 and EPA 40 CFR 311 requirements.
- 3) **Participation on the Region 6 Regional Response Team (RRT):** This SOP describes efforts of the RRT to ensure agencies, at the federal and state level, which have chemical safety and security responsibilities, are appropriately represented on the Region 6 RRT. This would include State health agencies, emergency management agencies, Poison Control Centers.
- 4) **Improving Coordination with Federal and State Agencies on Programs, Roles, and Contacts / Getting to Know You:** This SOP develops coordination with the RRT to have each agency on the RRT (state and federal) develop a one page summary of their regulatory programs for chemical safety and security. The compilation of these summaries will be shared with local/state/federal officials to assist officials in knowing which agency to refer to potential violations to, as well as information each agency may maintain on chemical safety and security. Will include how this information can be useful to federal and state agencies in response and prevention coordination.
- 5) **EPCRA Outreach / Enforcement for State/local Officials:** This SOP develops outreach to regulated facilities under EPCRA on the appropriate selection of emergency contacts on the Tier II form submitted to local and state officials (should be a local contact). Through LEPC newsletter, encourage local officials to verify contacts, during drills, exercises or other events.
- 6) **Guide to Provide First Responders with Access to Single Point of Contact for Facility Chemical Information:** This SOP develops an outreach card for fire fighters and responders to identify people and agencies that they can reach back to and get the interpretations and chemical specific information they need. Card will be provided to States and LEPCs electronically to distribute to local responders. Card will identify Subject Matter Experts so responders can reach back for expertise on databases and interpretation of fixed chemical facility data.
- 7) **LEPC Outreach:** This SOP develops new, and continues existing, practices to support LEPCs, including those who need assistance to continue or increase their activity. This will include established practices (HOTZONE, LEPC newsletter, workshops, LEPC website), but will also encourage use of local exercises for participation by those facilities covered by EPCRA/RMP/PSM/CFATS. LEPCs which have developed or implemented an innovative process or material will be encouraged to share with other LEPCs through the LEPC newsletter or other means.
- 8) **Inter-Agency Inspections and Enforcement Procedures:** This SOP identifies procedures for all agencies, federal and state, which have chemical safety and security responsibilities, for sharing information, as appropriate. This would include providing Points of Contact within each agency for data sharing on inspection/enforcement results; procedures for referring facilities to other agencies; determine the appropriateness of joint inspections; and encourage the participation of local officials on certain types of inspections. Reinforce to local and state

officials on the appropriate procedures for referring potential enforcement cases to EPA, DHS, or OSHA through outreach; train enforcement inspectors for RMP, SPCC/FRP, PSM, and CFATS programs on chemical safety/security compliance, so they can provide outreach to facilities during inspections. Conduct interagency training on chemical safety / security enforcement programs for inspectors focusing on RMP, PSM, CFATS, EPCRA, and SPCC/FRP programs.

2. Does your SOPs cover the following core topics:

- a) Procedures for a unified Federal, State, tribal, and local approach for identifying communicating, and responding to risks at chemical facilities: YES
- b) Operational coordination procedures, such as joint drills and exercise, electronic Tier II data management and revised inspection protocol for Federal, State, tribal, local agencies, and first responders: YES

3. What is the schedule for completing each of the SOPS?

The Workgroup has committed to finalizing each of the eight SOPs, and begin implementation of the SOPs, by July 1, 2015.

4. What is the status of your stakeholder involvement efforts, including, but not limited to, OSHA and EPA State Plans, State, municipal, and tribal entities?

Each SOP which involves State and local involvement will be provided as a draft to the Region 6 RRT State member agencies for review and comment. Each state on the Region 6 RRT has members from their environmental, emergency management, and public health, agencies. Currently, SOP #2 is in review by our State agencies, including the State Training Officers. We have briefed all of our States on the Workgroup and its objectives. Additionally, the workgroup briefs the RRT Executive Committee on progress during the monthly RRT Executive Committee conference call.

5. Do you have drafts of any of the SOPs that can be shared? If so, please attach them in Word or PDF format.

Attached is the FINAL SOP # 1, as well as the DRAFTS for SOPs #2 and # 6.

6. Please list any troublesome areas that are, or soon could, impact your progress on SOP production and implementation.

To date, the Workgroup has not identified any barriers or troublesome areas which might impact progress on SOP development or implementation.