

CEPAC NEWSBREAK

CHEMICAL EMERGENCY PREPAREDNESS ADVISORY COUNCIL NEWSLETTER

PROVIDED BY COLUMBUS PUBLIC HEALTH. THE COUNCIL IS APPOINTED BY FRANKLIN COUNTY COMMISSIONERS.

HOT TOPIC:

TIER 2 REPORTS DUE MARCH 1, 2017

It is Tier 2 reporting season, so please take time to review reporting requirements. CEPAC will hold two Tier 2 workshops the last week of January 2017 to familiarize those who are responsible for Tier 2 reporting with the EPA/SERC requirements. Workshop attendees also will have the opportunity to network and discuss common and unique reporting requirements for different Tier 2 reporting facilities.

Electronic Tier 2 reporting is the preferred reporting method and can be done at www.epa.gov/emergencies/content/epcra/tier2.htm. (Paper reports are still accepted.) The SERC Compliance Manual and Forms can be found at www.epa.ohio.gov/dapc/serc/invforms.aspx. When you submit electronically, you can send one e-mail to all three reporting places at once. (Reports can be sent as pdfs, zip files, compressed files or other electronic attachments).

Reports go to:

1. State Emergency Response Commission, c/o Ohio EPA, Lazarus Government Center, 50 West Town St.-Suite 700, P.O. Box 1049, Columbus, OH 43216-1049 (SERC@epa.ohio.gov)
2. CEPAC, 240 Parsons Ave., Columbus, OH 43215 (pjkowal@columbus.gov)
3. The jurisdictional fire department for your facility. A separate list of all Franklin County Fire Departments will be sent out to all Tier 2 filing facilities.

Send your fee sheet and payment no later than March 31, 2017 to: Ohio EPA, Dept. L-2711, Columbus, OH 43260-2711.



HOT TOPIC:

UPDATED CONTACT INFORMATION FOR FEDERAL EXPLOSIVES LICENSEES AND PERMITTEES

The Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) will provide updated contact information for federal explosives licensees and permittees (FELs) directly to each SERC/TERC for their geographic area.

- The ATF provides this information on a biannual basis.
- This plan was developed partially in response to concerns voiced by explosives industry associations that emphasized the need for more frequent and regular contact with local authorities.

This information can be disseminated to first responders and appropriate LEPC/TEPC members to:

- Help establish relationships and facilitate better communication between these local responders and the FELs in their areas.
- Assist local responders in discussing FEL explosives storage information for emergency planning and response purposes.
- Enable local authorities and FELs to discuss and develop training for emergencies involving explosives plants and storage facilities.

Questions/more information: Dean.A.Dickinson@usdoj.gov

HOT TOPIC:

USEPA ENCOURAGES TRIBES TO BE NOTIFIED WHEN SPILLS OCCUR

The National Response Center (NRC) is the sole point of contact for reporting oil, chemical, radiological, biological and etiological discharges into the environment anywhere in the U.S. and its territories.

The NRC also takes maritime reports of suspicious activity, security breaches and terrorist related activities for the U.S. Coast Guard and railroad incident reports for the U.S. Federal Railroad Administration.

The EPA encourages tribes to submit applications to the NRC to receive notifications when oil and hazardous material incidents happen in Indian Country.

Request the application from NRC: nrc@uscg.mil or fax 202-267-1322.

Questions about the application or to discuss the application process: nrc@uscg.mil or Nichols.Nick@epa.gov, 202-564-1970.

SUMMARY OF A FACT SHEET PROVIDED BY OSHA AND EPA: **THE IMPORTANCE OF ROOT CAUSE ANALYSIS DURING INCIDENT INVESTIGATION**

The Occupational Safety and Health Administration (OSHA) and the Environmental Protection Agency (EPA) urge employers (owners and operators) to conduct a root cause analysis following an incident or near miss at a facility. A root cause is a fundamental, underlying, system-related reason why an incident occurred that identifies one or more correctable system failures. By conducting a root cause analysis and addressing root causes, an employer may be able to substantially or completely prevent the same or a similar incident from recurring.

Employers covered by OSHA's Process Safety Management (PSM) standard are required to investigate incidents that resulted in, or could reasonably have resulted in, catastrophic releases of highly hazardous chemicals. A root cause analysis allows an employer to discover the underlying or systemic, rather than the generalized or immediate, causes of an incident. It is important to consider all possible "what", "why" and "how" questions to discover the root cause(s) of an incident. Tools employers can use to conduct a root cause analysis include: brainstorming, checklists, logic/event trees, timelines, sequence diagrams and causal factor determinations. Regardless of the tools used, four important questions should be answered: What happened? How did it happen? Why did it happen? And what needs to be corrected?

Benefits of Root Cause Analysis for Employers

Conducting a thorough investigation will help prevent a reoccurrence of an event. Employers are able to identify problematic areas of concern and take corrective actions that save money in the long run. They also can earn employee and public trust by providing a robust safety program that includes root cause analysis. Additionally, this program can help improve process reliability, increase revenues, decrease production costs, lower maintenance costs and lower insurance premiums.

SOURCES

These statements are intended as a guide only. They do not substitute EPA or OSHA statues or regulations, nor are they regulations. They cannot and do not impose legally binding requirements on the agencies, states or the regulated community, and the measures described may not apply to a given situation based on specific circumstances. This guidance does not represent final agency action and may change in the future.

Guidelines for Investigating Chemical Process Incidents, Center for Chemical Process Safety, 2nd ed., p. 179.

29 CFR 1910.119 40 CFR 68

Guidelines for investigating Chemical Process Incidents, Center for Chemical Process Safety, 2nd ed., p.180 Id.

For questions about CEPAC or the newsletter, contact CEPAC Program Manager Peter J. Kowal at 614-645-6275 or pjkowal@columbus.gov.