



FACILITY DISASTER PLANNING SUBCOMMITTEE

RECAP

April 19, 2012 Meeting

LEPC District VIII, 4000 Gateway Centre Blvd., Suite 100, Pinellas Park, FL 33782 - 727/570-5151, Staff Contact: John Meyer

Attendees (Present) - Thea Dunmire (ENLAR/Meeting Chair), Chet Klinger, Gary Dunmeyer (Harcros Chemicals), Jennifer Garwood (Progress Energy), Patricia Williams (HRP Associates), Erinn Skiba (Hillsborough County Emergency Mgmt.), Stacie Cooper (SWS Environmental), Betti Johnson (TBRPC) & John Meyer (LEPC 8 Staff/TBRPC)

Please note that text appearing as **red** symbolizes an action item.

1. INTRODUCTIONS

2. ANNOUNCEMENTS AND/OR RECAP OF 1/19/12 MEETING

Mr. John Meyer characterized the highlights of the January Subcommittee meeting to be:

- Prior Subcommittee initiatives included specific recommendations to bolster the Florida Business Disaster Survival Kit with important hazardous material data, resources and capabilities. This set of recommendations was provided to Betti Johnson of TBRPC staff. It is envisioned that many of these recommendations will be incorporated into the program prior to posting of the Kit by the Florida Division of Emergency Management to their website. Betti will address this issue in greater detail later in the Agenda.
- Hazardous Materials Awareness Week ran from Sunday, January 22 - Saturday, January 28. The theme was "Mercury Awareness & Education." LEPC staff e-mailed links to the informational resources (2 Videos/2 Printed Materials) to the all the LEPC e-mail contacts on Monday, January 23rd. The resources were additional posted to the LEPC website.
- LEPC staff advised the Subcommittee membership of the refinements to the FloridaHMIS.org electronic filing program in preparation for the 2011 reporting. These improvements included better integration with electronic payment site (i.e. Bank of America), alleviation of some conflicts with "Pop-Up Blocker(s)"; and addition of more "Wizards" and instructions for users. Facilities were once again required to provide hard copies of all reporting to their local LEPCs and fire departments.
- LEPC staff sent out notification of the scheduled February 15 & 16 EPCRA How-to-Comply Workshops through e-mail to all LEPC facility contacts. In addition and as requested by Subcommittee Chair Dunmire, a Press Release, designed to advise local facilities of the March 1st reporting deadline, identifying some of the discrepancies previously detected, and informing them of the scheduled How-to-Comply workshops being held locally, was prepared and distributed to the local print media.

Subcommittee Chair Thea Dunmire handed out a written statement prepared when the Subcommittee was setup outlining the Subcommittee's origin and purpose for the benefit of newer attendees (see **Exhibit 1** of this Recap). As contained in this document, the three key Subcommittee functions are: outreach; education and training; and facility recognition. The target audience for Subcommittee initiatives are businesses within the LEPC purview (i.e. large quantity hazardous material users).

Chet Klinger added that when former LEPC Chair Ernie Hiers returned from recovery assistance efforts associated with Hurricane Katrina, there appeared to be an unmet need to educate companies to better manage hazmat inventories in preparation for disasters locally. In addition, the Subcommittee was asked to promote better integration between facility's Business Continuity and Disaster Recovery Plans.

3. FEMA'S PRIVATE SECTOR PREPAREDNESS CERTIFICATION

Chair Dunmire discussed that FEMA's Private Sector Preparedness Certification program is designed to encourage/promote nationwide preparedness, resilience and recovery among private sector entities in an emergency.

As summarized by Chair Dunmire, "the program encourages organizations to utilize recognized third-party standards for developing business continuity management systems. Department of Homeland Security (DHS) has recognized three standards (i.e. ASISSPC.1 & BS25999 & NFPA1600) and established a third-party accreditation scheme, administered by ANSI-ASQ National Accreditation Board (ANAB). Under the PS-Prep certification scheme, organizations can either get third-party certification from a registrar accredited by ANAB. A self-declaration of conformity program is being considered by DHS that would be available to small businesses." Many smaller facilities have been reluctant to have their plans accredited due to the expense involved so the option to have the facilities potentially self-certifying their plans may be more appealing.

Consistent with the mission of the Facility Disaster Planning Subcommittee, the PS Prep program encourages businesses with reportable hazardous material inventories to develop comprehensive Business Continuity and Disaster Recovery Plans in order to address the risk of hazardous material releases to the environment resulting from a disaster.

Subcommittee members agreed that a future workshop would be beneficial but getting the information out first about the PS-Prep Program would be critical to the success of the workshop.

Ms. Stacy Cooper asked whether the PS-Prep certification, if obtained, could result in a reduced insurance rate. Chair Dunmire affirmed that this may be possible.

Mr. Chet Klinger inquired as to what kind of feedback can we provide to DHS once a workshop is completed? How can they make it better? Chair Dunmire mentioned that any feedback to FEMA and/or DHS (e.g. good, bad or indifferent) would likely be viewed as beneficial for making the program better.

Those attending discussed that the workshop should be:

- at a “minimal” cost to promote participation;
- one-half day in length, adjourning by 1:00 p.m.;
- promoted through Press Release(s) and notifications through FDEM’s e-mail database when received;
- targeted at facilities that submit Tier II reports;
- limited to the number of registrants that can be accommodated in the TBRPC Conference Room; and
- scheduled dependent on the availability of speakers and the TBRPC Conference Room.

Chair Dunmire mentioned that it may be appropriate to hold another Subcommittee meeting in the interim (prior to the next quarterly meeting) to coordinate the specifics of the workshop depending on the workshop timing. **Chair Dunmire agreed to provide further coordination with Mr. Meyer as to Conference Room availability, the availability of FEMA staff (and Mr. Moore in particular), and the possible availability of other pertinent/ appropriate speaker(s).**

4. UPDATE ON 2011 TIER II REPORTING & DISCUSSION REGARDING POSSIBLE REVIEW INITIATIVE

Mr. Meyer identified that the March 1st Tier II reporting deadline has come and gone and the LEPC has received hundreds of Tier II reports for facilities across the Region, as typical. Mr. Meyer demonstrated varying formats of reports received including “Screen Shots” of hazardous material inventories and facility contact generated through the FloridaHMIS.org program. Mr. Meyer reminded the attendees that facilities remained obligated to provide copies of all reporting to their local LEPCs and fire departments, in addition to the SERC.

Chair Dunmire inquired whether it would be advantageous to conduct another quality control assessment of Tier II reports to notify facilities of reporting errors and to bolster the Subcommittee’s e-mail database of facility contacts.

Mr. Meyer identified that he and Mr. Klinger had undertaken the extremely time-consuming initiative last year and detected many errors in reporting and that a few facilities were contacted to notify them of their reporting mistakes. A few revised reports were generated in this regard. Mr. Meyer and Mr. Klinger proceeded to document all major reporting mistakes and to document trends to the extent they could be determined. The LEPC did not have records for numerous facilities on the SERC’s database and there were even records for facilities that the LEPC possessed which did not appear on the SERC’s database listing. A cumbersome listing of all findings and observations were submitted to FDEM staff to evaluate but, although acknowledging appreciation, no formal response was ever received. However, it was observed that several of the facilities that were not initially part of the SERC’s database have subsequently been added. Mr. Meyer concluded with his recommendation that the Subcommittee wait another year (or so) to make the determination of whether or not to conduct this analysis again. First, it is very time consuming and second, if the State is successful in receiving grant funds they applied for, allowance for the use “Tier II Submit” software would be a realistic option in which facilities could submit their inventories. If such program was provided as an option to submit inventories, the State anticipates a 85-90%+ electronic

submittal rate. In that case, it would be much easier to evaluate and manipulate an electronic database as opposed to evaluating hard copy records.

Finally, Mr. Meyer added that the State has a record (and e-mail address) of all people submitting their reporting electronically, at minimum. **Mr. Meyer agreed to contact the appropriate FDEM personnel to obtain the e-mail address database for District 8 for future contacting purposes including notification of future Workshops and/or Seminars.** If e-mail addresses of the *appropriate* facility contacts are not available as part of this database, we hope that future notifications of workshops would be forwarded to the appropriate parties.

Ms. Patricia Williams inquired whether there is a way to determine facilities that have never reported. Mr. Meyer responded that there is no easy way to find these facilities but each year the SERC's database of facilities continues to grow and they presumably utilize all known resources to detect these facilities and bring them into compliance with the EPCRA. Ms. Dunmire added that all facilities could be reminded of their reporting obligations through press releases.

Ms. Williams agreed to evaluate the merits of re-evaluating the Tier II Reports at this time.

5. UPDATE ON SERC/EPA “MEMORANDUM OF UNDERSTANDING” REGARDING SUPPLEMENTAL ENVIRONMENTAL PROJECT(S)

Mr. Meyer indicated that there is no update to provide at this point but that the SERC is actively pursuing this *Memorandum of Understanding* with EPA which, if executed, would allow the establishment of a Supplemental Environmental Projects (SEPs) with monies that would have otherwise been paid in fines by violating industries. SEPs are typically localized training provided to first responders. Mr. Meyer emphasized that such projects are NOT administered and/or affiliated with the LEPCs. In fact, a similar MOU between these agencies was in effect through 1999. Ms. Dunmire remarked that it is too bad that the funds could not alternatively be utilized to provide localized facility training. **Mr. Meyer agreed to provide future updates of this issue at future Subcommittee meetings as may be relevant.**

6. UPDATE ON POTENTIAL FOR “UNIVERSAL CREDENTIALING”.

Mr. Meyer advised that Ms. Stephanie McDannold passed along her apologies for being unable to attend today's meeting.

For the benefit of newer attendees, Mr. Meyer identified that the issue surfaced from one of the *Facility Disaster Preparedness Forums* conducted by the Subcommittee last year. In summary, there is a concern that appropriate facility personnel may not be able to easily return to their impacted facility due to the multiple levels of law enforcement and anticipated roadblocks which could be implemented following a disaster. “Universal Credentialing” would be viewed as a type of universal badging system that could be recognized by all levels of law enforcement and would enable appropriate facility representative(s) to gain quicker access to their affected parcels.

Ms. McDannold previously acknowledged being asked to serve as a member of a recently-conceived Subcommittee to discuss this and other issues by Mr. John Cherry of FDEM. **John Meyer agreed**

to contact Ms. McDannold to confirm that she remains an appropriate contact for future updates regarding this issue. [Update: Ms. McDannold identified that Mr. Cherry has not officially formed the Subcommittee yet, to her knowledge, but continues to expect to serve on this Subcommittee due to her position as “FEPA Business and Industry Committee Chair” and would provide updates accordingly]

7. UPDATE ON “FLORIDA BUSINESS DISASTER SURVIVAL KIT” & POTENTIAL FUTURE TRANSFER TO FDEM WEBSITE

Ms. Betti Johnson discussed that the *Florida Business Disaster Survival Kit* - a web-based program designed to assist facilities with business continuity planning. As recognized in Mr. Meyer’s earlier remarks, the Facility Disaster Planning Subcommittee (FDPS) had recognized a disconnect with planning for hazardous materials incidents. The FDPS prepared a host of recommendations to “make the Kit better.” The current intent is for the Tampa Bay Regional Planning Council to turn the Kit over to the Florida Division of Emergency Management for incorporating the recommendations and ultimate posting to their website. The recommendations were provided to the FDEM in December with the understanding that the FDEM would, in turn, solicit proposals through the RFP process to incorporate the recommendations. The Kit is already available on-line and/or viewable at www.fldisasterkit.com. **Ms. Johnson has agreed to provide an update on this topic in conjunction with the next Subcommittee meeting.**

Finally, and as informational, Ms. Johnson identified that the “Public Sector-Private Sector Disaster Preparedness Summit” has been scheduled for April 30 - May 2 in Daytona Beach. **Ms. Johnson agreed to provide more information and the specifics about the Summit to John Meyer for further transmittal to Subcommittee members. [Update: The Summit information was promptly provided by Ms. Johnson. Mr. Meyer promptly forwarded this informational link to all Subcommittee members via e-mail on the afternoon of April 19th]**

8. UPDATE ON “COMMUNICATION AMONGST AGENCIES.”

Mr. Chet Klinger discussed the conversation he previously had with Chief Bill McElligott (Dunedin Fire Department), following one of last year’s Facility Disaster Preparedness Forums, regarding the mutually-beneficial relationship which could be established between the Subcommittee and the local fire departments. The fire departments could serve as a conduit for additionally alerting facilities of hazardous material reporting requirements and notifying facilities about future workshops that may be conducted by the Subcommittee and/or the LEPC. **Mr. Meyer agreed to immediately add Chief McElligott to the Subcommittee member e-mail list. [Update: Chief McElligott has subsequently been added to e-mail listing]**

Mr. Chet Klinger proposed that the Facility Disaster Planning Subcommittee should consider hosting a How-to-Comply workshop for fire department personnel including elaboration on the Tier II reporting process with specific emphasis placed on:

- What the Tier II information means
- What is fire hazard and risk?
- How important is Tier II report in terms of submittal and accuracy?
- What is the timeline for reporting?
- What are the reporting timelines for new facilities or facilities which close?

Mr. Meyer agreed to obtain the e-mail addresses for appropriate local fire department personnel for the purpose of inviting to the future workshop.

Mr. Klinger agreed to assist in the facilitation of this Workshop.

9. OTHER ISSUES/COMMENTS

Mr. Meyer identified that the remaining 2012 meeting schedule for the Facility Disaster Planning Subcommittee are pre-scheduled for Thursday, July 19th and Thursday, October 18th to coincide with the pre-determined meeting schedule of the third Thursdays of January, April, July and October. Noting that Subcommittee membership and participation appears to be growing and the fact the we may have “outgrown” TBRPC’s Conference Room C, would there be any opposition in meeting one day earlier for all future meetings (i.e. third Wednesdays of respective months). Chair Dunnire polled the attendees and no opposition was provided. Therefore, the future Subcommittee meeting schedule for remaining 2012 meetings will be **July 18th & October 17th**.

10. SUMMARY OF ACTION ITEMS FOR NEXT MEETING

PARTY	TASK(S)
Thea	Coordinate with John as to TBRPC Conference Room availability and with suggested presenter(s) of the PS Prep Workshop about their availability
John	Contact FDEM to obtain e-mail addresses associated with facilities electronically filing within LEPC District 8
	Provide future updates regarding the SERC/EPA <i>Memorandum of Understanding</i> as may be relevant.
	Contact Ms. McDannold to confirm that she remains an appropriate contact for providing future “Universal Credentialing” updates. [✓]
	Forward information regarding the upcoming Private/Public Sector Disaster Preparedness Summit upon receipt from Betti Johnson to Subcommittee members. [✓]
	Add Chief Bill McElligott to Subcommittee e-mail addresses. [✓]
Patricia	Obtain e-mail addresses for all local fire departments for purpose of notification of future meeting.
Patricia	Evaluate the merits of re-analysis of the Tier II Reports at this time
Stephanie	Provide future updates regarding “Universal Credentialing” as may be relevant.
	Discuss the FDEM Private/Public Sector Disaster Preparedness Summit at next Subcommittee meeting.
Betti	Provide status update regarding the <i>Florida Business Disaster Survival Kit</i> at next Subcommittee meeting
	Provide information regarding the upcoming Private/Public Sector Disaster Preparedness Summit to John Meyer for further dissemination to Subcommittee members. [✓]

PARTY	TASK(S)
Chet	Develop proposal for How-to-Comply workshop for fire department personnel for consideration by Subcommittee.

11. ADJOURNMENT.

Following a reminder of the next scheduled meeting of Wednesday, July 18th, Subcommittee Chair Dunmire adjourned the meeting at 12:45 p.m.

EXHIBIT 1

Facilities Disaster Preparedness Planning - Tampa Bay LEPC - District VIII

The Facilities Disaster Preparedness Planning project originated as a challenge from LEPC Chairman Ernie Hiers, who upon returning from Louisiana after Katrina, was overwhelmed by the amount of hazardous materials/hazardous waste which had been allowed to pollute the Louisiana landscape and waterways due to failure to properly safeguard these materials. As a result, the Tampa Bay LEPC began in 2006, primarily as an outreach effort to commemorate Hazardous Materials Awareness Week in January, a project which has grown with the enthusiasm of the members who volunteered to become a part of the planning subcommittee and are now simply referred to as the "Disaster Planning Team."

The major push is to have businesses and government facilities having reportable inventories of hazardous materials to go beyond simply having Spill Prevention Control and Countermeasures (SPCC) plans to having well-developed Business Continuation and Disaster Recovery (BCDR) plans that takes the SPCC plan to a higher level. Such a BCDR plan besides addressing communications with employees, stockholders, the public and customers, protecting and preserving electronic and paper data and records, and cleaning up and restoring structure and utilities, would have added emphasis on shutting down chemical processes, preserving, securing and protecting hazardous materials from flood, wind, rain and looting, and protecting the environment. Chemical Security is a hallmark of new DOT regulations that affect shippers of hazardous materials.

The Facilities Disaster Planning Preparedness Team, led by Chet Klinger of Essilor of America, now has 10 members, half of whom are functional experts who provide expertise for the workshops which have been held and who help teach. The work of the Group boils down to a three-prong approach toward improving the quality of preparedness among facilities having hazardous materials in the Tampa Bay Area:

Outreach - to assess and rate the disaster potential for Tier II and other facilities having hazardous materials with in the region which face possible disasters such as a major hurricane or other possible disasters; to Utilize Tier II reports and inputs from county and local emergency managers to identify high risk facilities in the face of possible disasters; and to seek voluntary inputs from such businesses, private and public, regarding their preparedness and planning. This effort entails examining available data and interviewing personnel in both the private and public sector about the possible risks and readiness.

Education and Training - this team task is to develop a series of workshops to help large facilities improve on disaster preparedness and planning; to educate all facilities having hazardous materials; and to arrange speakers to help support these workshops.

Recognition - finally, this team task is to organize an incentive program for recognizing great planning, readiness, and response among our various facilities withing the region. This effort will evaluate the progress this group could be making after one year.