



Successful Practices in Title III Implementation

Chemical Emergency
Preparedness and Prevention
Technical Assistance Bulletin

**Woodbury County, Iowa
State of Virginia
Fairfax County, Virginia
Pierce County, Washington**

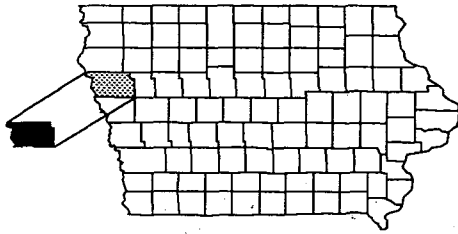
ABOUT THIS BULLETIN

This is another in a series of bulletins EPA is issuing to provide examples of implementation programs and strategies of the Emergency Planning and Community Right-to-Know Act of 1986, known as Title III, that are innovative or have proven effective. The purpose of these bulletins is to share information on successful practices with Local Emergency Planning Committees (LEPCs), State Emergency Response Commissions (SERCs), fire departments, and other Title III implementing agencies throughout the country in the hope that such information will prove useful to other SERCs and LEPCs as their programs develop and evolve.

Elements from the programs featured here may be transferable to other programs in similar communities or with similar situations. The bulletins provide information on a variety of practices — for example, planning, compliance, information management, hazard analysis, and outreach. The particular topics covered in each LEPC or SERC profile are listed at the upper right hand corner of the first page of the profile for easy reference.

The descriptions of the innovative and effective implementation programs and strategies are not exhaustive. They are meant to provide readers with enough information to determine if a particular approach is applicable to their own situation. Each profile includes a contact person who can provide more detailed information.

If you know of Title III implementation efforts that you feel would be of interest to others, please contact your EPA Regional Chemical Emergency Preparedness and Prevention coordinator (see list on the last page) or the Emergency Planning and Community Right-to-Know Information Hotline at 1-800-535-0202, or, in Washington, DC, 479-2449.



**Compliance
Funding
LEPC Organization**

WOODBURY COUNTY, IOWA

- LEPC:** 60 members representing 48 entities, including civil defense, police, fire, hospitals, ambulances, funeral directors, American Red Cross, Salvation Army, ham radio operators, media (print, radio and television), and industry
- Population:** 100,000
- Facilities:** 140, including 40 which reported for section 302 farm chemical manufacturers and distributors as well as some warehouses that handled over one million pounds of hazardous chemicals a week were among the section 302 reporters

Woodbury County, Iowa, is a mostly agricultural community bordering Nebraska and South Dakota. Sioux City is its only urban area. On July 19, 1989, United Air Lines Flight 232 was forced to attempt an emergency landing at the Sioux City airport while en route from Denver to Chicago. The plane's entire hydraulic system had been destroyed and the plane was virtually uncontrollable. If it was not for the heroic efforts of the pilots and the quick response of the emergency response personnel on the ground at Sioux City, there would not have been over 180 survivors from a plane that had cartwheeled across a runway and exploded into a great ball of flames.

The response at Sioux City would not have been as quick and coordinated had it not been for the teamwork developed through the establishment of a disaster committee long before this tragedy. This disaster committee includes all elements of the community that have a role to play in any emergency. After the passage of Title III, this disaster committee incorporated into its charter all the functions and the mission of a local emergency planning committee.

LEPC ACTIVITIES

Formation of the LEPC. The disaster committee was formed as a result of a continuing series of emergency simulation exercises held within the county. These exercises were originally conducted to fulfill State obligations for the local hospitals to maintain certification and for the local civil defense agency to conduct an emergency exercise every five years. Faced with these obligations and understanding the need to be prepared

for any emergency, the county chose to conduct a full-scale emergency exercise every year. Initially, representatives from civil defense, fire, police, hospitals, and ambulatory services would meet only to design and conduct the yearly exercise. Based on evaluations of these exercises, the representatives determined it was important to meet to discuss emergency preparedness and response issues beyond conducting exercises. These groups agreed to meet on a monthly basis.

After the passage of Title III, the State assigned the county the task of developing an LEPC. The county recognized the disaster committee as the most appropriate vehicle for establishing the LEPC. However, because the disaster committee was composed of a limited group of community organizations, representatives of other elements of the community were added to achieve the broad-based participation required by Title III. These other elements included elected officials and representatives of industry, funeral directors, ham radio operators, and the media. These new members have valuable and varied experiences and expertise to offer, especially the industry representatives. Funeral directors were able to help the county address the issue of handling mass fatalities in an emergency situation (for example, in the crash of Flight 232). The addition of elected officials helped elevate the profile of the disaster committee within the community.

Emergency Exercises. The county utilizes a well-developed and organized emergency exercise program to continually improve its coordination and communication skills. In 1987, the county conducted an exercise based on the scenario of a major plane crash at the Sioux City airport. The next year, 1988, the exercise scenario was a train with hazardous materials colliding with a school bus. These exercises provide the county with an excellent opportunity to test their response system and improve the coordination and cooperation of all elements of the community that would be involved in such a response. The emphasis of these exercises is on improving communications during crises.

One result of this emphasis on communications has been the formation of a communications subcommittee, which is exploring ways to improve the county's emergency communication and broadcast systems. This subcommittee is also developing a mobile command post for the county. The base for this command post is a 40-foot trailer donated by a facility. A union local has donated labor, while the remaining funding for this project will also come from donations.

Outreach. The county has employed all of the local media — print, radio, and television — in providing facilities and the general public with information on Title III, through articles and public service announcements. The local hospital sponsored a free luncheon for 30-40 businesses in which a panel of civil defense, police, fire, Red Cross, and other officials discussed the Title III requirements. The panel members provided assistance to these businesses in complying with the regulations and developing emergency plans. The hospital, in association with the disaster committee, is planning another luncheon this fall for school officials and, then, next spring, for businesses in neighboring communities, including out-of-State communities that border the county.

Inter-County Coordination. The county is coordinating its planning and response activities closely with the neighboring communities. Woodbury County shares borders with four counties in Iowa and two States, Nebraska and South Dakota. With all counties having limited resources, better coordination and sharing of resources are needed for comprehensive responses to crisis situations. Woodbury County plans to move aggressively in expanding the tri-State preparedness activities. The county recently contracted with Siouxland Interstate Metropolitan Planning Council (SIMPCO), a regional planning authority, to review all county plans to ensure that the county's plan parallels the plans of neighboring communities that have contracted with SIMPCO.

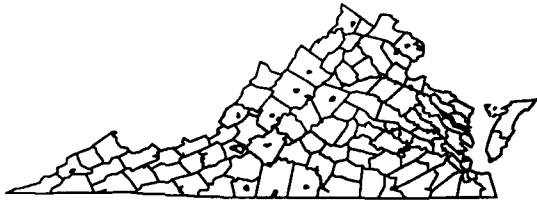
Following improved coordination among neighboring communities, the county would like to see the creation of a regional hazardous materials response team. This team would not only be designed to better utilize limited resources for the entire tri-State area, but it could also assist in planning and conduct training for first-responders throughout the area. However, because of limited funds, the counties of the tri-State area cannot establish such a team at this time.

LESSONS LEARNED

Teamwork is Essential. The county believes they were prepared for the crash of Flight 232 because of the dedication and determination of a group of individuals to work together as a team to prepare for the worst. The county had the commitment and active support of many members of the community, including elected officials, industry, and even funeral directors. This positive spirit of teamwork was especially apparent on the part of industry facilities. In response to the plane crash, industry representatives on the disaster committee offered and provided clerical and support staff, technical information, and an airplane hanger for the storing of the passengers' personal effects gathered from the plane wreckage. Through the working relationships developed within the disaster committee, this assistance was efficiently and quickly coordinated and provided.

Know All the Title III Players. While most LEPCs have limited resources and financial support from Federal and State sources, the county believes it is still vitally important for the LEPC to get to know all the Title III players, especially at the Federal and State level. LEPCs should learn to work with their State and Federal counterparts for two reasons: 1) to identify any available resources the State and Federal officials may have to offer including guidance, training, and technical assistance; and 2) to create a working relationship with these officials, which will be extremely helpful in an emergency situation. Now is the time to learn to work together, not after a DC-10 crashes in your community.

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**Training
Outreach
Liability
Information Management
Use of Section 313 Data**

STATE OF VIRGINIA

State Characteristics: 114 Local Emergency Planning Districts, including 73 counties, 18 cities, 2 towns with populations of 5,000 or more and 21 joint districts

SERC Membership: Eight State agencies, including the Department of Waste Management (Chair); Water Control Board; and the Departments of Emergency Services, Air Pollution Control, Fire Programs, Health, Labor and Industry, and State Police

Virginia has been one of the most active States in implementing Title III. It has provided training for its LEPCs and affected facilities to help both in understanding their roles in the Title III process. Its SERC, the Virginia Emergency Response Council (VERC), has been assigned the responsibility of providing guidance and training to each community to assist in developing a chemical emergency planning and preparedness program that meets each community's specific needs.

SERC ACTIVITIES

Training. The VERC has been very active in providing training and technical assistance to its LEPCs and the regulated community. The VERC has sponsored and presented numerous training seminars for LEPCs, other local government officials, and industry at locations throughout the State. The five-day "Hazardous Materials Contingency Planning Course," developed by FEMA, EPA, and DOT, has been offered eight times in Virginia. Virginia, like many other States, has sent personnel to be trained as trainers for this course. For industry in Virginia, the VERC presented 10 seminars that provided a general, but thorough, overview of all Title III requirements. The VERC also sponsored eight seminars that specifically addressed the section 313 toxic chemical release reporting requirements.

Outreach. In supporting its LEPCs, the VERC has developed many outreach materials that have helped the LEPCs recognize their responsibilities as well as provided concrete assistance in fulfilling those responsibilities. For example, the VERC published a guidance document for its LEPCs to use in establishing procedures for handling requests for

Title III information from the public. The VERC also produced a training video entitled, "Preparing for Chemical Emergencies." This video gives LEPCs a general overview of their roles and responsibilities under Title III and suggests how to prepare for chemical emergencies without Federal or State funding.

The VERC maintains regular communications with all its LEPCs and acts as a conduit for any relevant guidance, training, and technical assistance offered by the Federal government. As part of the VERC's commitment to keeping its LEPCs informed, the VERC provides each LEPC with copies of any EPA guidance or outreach document within one week after it becomes available to VERC.

The VERC believes that the success of Title III depends on an effective outreach campaign to inform industry of its responsibilities and citizens of the information available to them on chemical hazards in their community. One of its first products was a series of advisories for facilities on each of the Title III requirements and deadlines. These advisories were sent to over 5,000 facilities identified as potentially subject to the requirements. These advisories served a dual purpose: they provided industry with information on complying with Title III requirements and informed the LEPCs, who received copies of these advisories, that they would be the recipients of this information.

Liability. One of the first concerns LEPCs raised in the early days of Title III was LEPC members' liability in planning for and responding to a chemical emergency. The VERC sought the advice of the Virginia Attorney General's office, which concluded that the LEPC members are agents of the SERC. Based on this opinion, the VERC obtained a commitment from the Virginia Division of Risk Management to provide insurance coverage for all LEPC members for any claim made against them for any acts, errors, or omissions that occur in the course of their authorized governmental duties.

Information Management. In order to manage the significant amount of Title III information more effectively and make it more accessible to the LEPCs, the VERC developed an information management system that allows for systematic retrieval of the thousands of facility reports submitted. Title III information is currently available to the LEPCs upon request to the VERC. However, the VERC plans to make this information management system accessible to any LEPC with modem capabilities.

The computerized information management system used by the VERC for storing the Title III information and developing its planning initiatives is the Emergency Information System/Chemical (EIS/C) software. EIS/C is run on an IBM-compatible computer and records chemical, facility, transportation, and other planning and response information. This information is graphically displayed on color maps. The EIS/C system also stores the MSDS and Tier I and II information for the VERC.

The VERC has also purchased the Occupational Health Services' (OHS) MSDS ON DISC software, which provides generic chemical information on over 9,800 hazardous chemicals.

As the recipient of the section 313 toxic chemical release reporting submissions, the VERC has input these facility reports on a database to provide citizens ready access to information on annual releases of toxic chemicals to all environmental media from facilities within the State. The public can write or call to request a hardcopy of any available facility report. Section 313 data also can be obtained on disk upon request.

Use of Section 313 Data. In November 1989, the VERC developed a report for the Governor that evaluates the section 313 data submissions for calendar years 1987 and 1988. The report focuses on how much facilities in Virginia reduced their emissions from 1987 to 1988. The VERC believes this report shows that most facilities have strived to reduce their releases following their reporting for calendar year 1987.

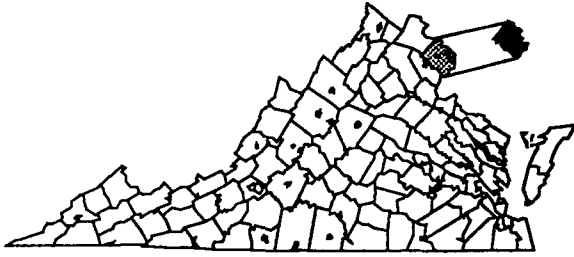
LESSONS LEARNED

LEPC Role Goes Beyond Planning. The VERC believes that the role of the LEPC, in keeping with the spirit and intent of Title III, goes far beyond the preparation of an emergency plan. The LEPC is the front-line for all planning, preparedness, and prevention activities because of its relationship with the community. More and more, citizens are looking to the LEPC to provide answers concerning health effects of hazardous and toxic chemicals, waste reduction, chemical process safety, and emission reduction. As a recipient of most of the Title III information, the LEPC has a vital role to play in addressing these concerns. As preparedness and response groups, the LEPCs have an inherent responsibility to protect the health and environment of their community. The LEPC provides an excellent vehicle for providing information to the community, particularly industry, on how to identify chemical hazards and safely deal with them. The VERC believes the section 313 data are a very useful tool for expanding the capabilities of the LEPC; more local governments should use the data.

Develop Generic Chemical Hazard Data. The VERC found using generic information on chemical hazards — for example, the MSDS ON DISC database — more useful and effective than searching through the numerous filing cabinets that contain all the MSDS submissions received under section 311. Besides the easier access to the information, the VERC found that the information on this computerized and updated database was more thorough and informative than sifting through duplicative MSDSs, which sometimes contain conflicting, outdated, or inaccurate data. However, recognizing that the MSDS ON DISC did not include all hazardous chemicals, the VERC reviewed its copies of MSDSs and entered all those MSDSs that were not in the computerized database.

Computers Are Good Planning Tools. Computers can be useful and efficient tools in the planning process. Hazard analysis and plan revisions can be accomplished quickly and accurately. Computers can significantly reduce the paper burdens associated with planning and allow for greater and more effective manipulation of the data for planning as well as response.

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Use of Section 313 Data
Compliance
Planning
Information Management
Outreach
Funding

FAIRFAX COUNTY, VIRGINIA

LEPC: 30 members, including elected officials and representatives of county and city law enforcement; count fire department; county environmental, planning, health, and transportation agencies; public interest groups; hospitals; media; public utilities; industry; and citizens

Population: 750,000

Facilities: 286 reporting facilities, including gas stations, pesticide distributors, county waste water and drinking water treatment plants, a printing ink manufacturer, and a large metal finishing plant

Fairfax County is part of the greater Washington, DC, metropolitan area. The county includes several major highways which transport many hazardous chemicals. Its LEPC, which has been organized since late 1987, holds monthly meetings which are always open to the public. The Fairfax County Fire and Rescue Department, a member of the LEPC, is one of the largest and best equipped fire departments for handling hazardous chemical emergencies in the Mid-Atlantic states.

LEPC ACTIVITIES

Use of Section 313 Data. In order to improve facility compliance with all Title III requirements, the LEPC has obtained the 1987 and 1988 toxic release Form R submissions for its jurisdictions from the Title III Reporting Center, and compared those submissions with the list of facilities that submitted Tier II forms (requested by the county for section 312 reporting). Based on this comparison, the LEPC determined that all facilities that reported for section 313 also reported for sections 311-312. The LEPC now has direct computer access to the section 313 data using the county fire department's hazardous materials response vehicle link to TOXNET (see the Information Management section).

Compliance. In addition to using the section 313 information to assess compliance, the LEPC checks the list of facilities that report releases under section 304 to determine if these facilities had reported under sections 311-312. The LEPC is also conducting a survey of all businesses and apartment buildings to identify facilities that are subject to the Title III requirements. The survey identifies hazardous chemicals these facilities may have present on site (for example, chlorine for swimming pools) and determines what fire prevention equipment, if any, they have available. A local ordinance requires any facility handling hazardous materials to obtain a fire prevention permit before starting operation. The county has established permitting procedures that require the fire department to inspect each facility before issuing the permit. Access to information supplied in response to permit requirements allows the LEPC to identify new facilities subject to Title III compliance.

Planning. As part of the LEPC's planning process, any facility that submitted a Tier II form for an extremely hazardous substance is identified as a critical hazard facility. The LEPC requests that the critical hazard facility submit a facility response plan, facility maps with locations of all hazardous materials, and information on the facility's release detection equipment and practices. The LEPC requests the information using its authority under section 303(d)(3) of Title III, which allows the LEPC to request any information relevant to emergency planning. Using this information, the LEPC annually updates their emergency response plan.

Information Management. Currently, the LEPC has one fully equipped hazardous materials response unit for responding to chemical emergencies. The hazmat unit uses the Harwell chemical database for chemical hazard information and protective clothing recommendations. This database is specifically designed to provide this information for the initial response to a hazardous material situation before detailed information on the extent and cause of the accident is identified.

The hazmat unit also subscribes to HAZARDLINE database, which provides on-line response and medical effects information on hazardous substances, and TOXNET, which provides on-line toxicological information on hazardous substances, as well as the section 313 toxic release inventory. The hazmat unit is equipped with these multiple sources on chemical hazard information because their response procedures require that information used in incident decision-making be verified by three sources.

The hazmat vehicle has a cellular telephone modem, which allows the response personnel, while en route to the incident, to access Tier II information, especially storage locations and chemical hazard data, from the database maintained at the station. The vehicle is equipped with an IBM PS/2 Model 30 personal computer. Using the modem, HAZARDLINE and TOXNET on-line databases can be accessed from the hazmat vehicle. At present, the facility maps cannot be adequately accessed. However, the hazmat unit is planning to obtain equipment necessary to transmit the maps and allow for plume modelling with the on-board computer.

In the future, an IBM PS/2 Model 80 personal computer located at the station will store the Title III submission information on dBase (a software package for database management). Data for planning and response activities — for example, storage, facility, and transportation locations — will be stored on this computer using the Emergency Information System/Chemical (EIS/C) software package. EIS/C records chemical, facility, transportation, and other planning and response information. The EIS/C system also stores the MSDS and Tier I and II information. Use of EIS/C also allows the LEPC to develop facility maps and conduct hazard analyses. At present, this information is only available for response personnel serving on the hazmat unit. However, the LEPC plans to make all information collected under Title III available via computer to all fire stations within the LEPC's jurisdiction.

Outreach. Through the cooperation of the area's media, the LEPC has been able to communicate their Title III messages to the public and potentially covered facilities. In particular, shortly after the LEPC was formed, a series of articles on Title III, planning for chemical emergencies, and response procedures and equipment was published in the local suburban newspaper. Announcements of all LEPC meetings have also been published. The LEPC developed a brochure to explain the Title III requirements, the roles of the LEPC, and how the public can access the Title III information. Fairfax Hospital and Washington Gas and Light printed a short, straightforward brochure for citizens.

Funding. Effective with calendar year 1988 reporting for Title III, the Fairfax County Fire and Rescue Department has been assessing fees based on their fire prevention code fee schedule. A one dollar per page fee is charged for all Title III submissions including MSDSs, facility plans, and Tier II forms.

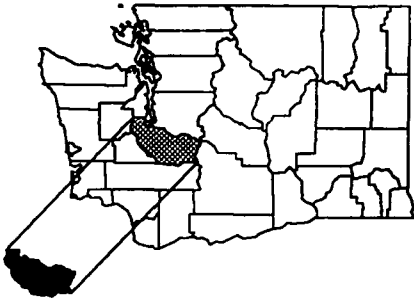
LESSONS LEARNED

LEPC Serves as Focal Point for Hazardous Materials Issues. The LEPC's active role in publicizing its activities and responsibilities under Title III has fostered an additional role as the focal point for the community on hazardous materials issues. Citizens now look to the LEPC for answers to their concerns about particular chemical hazards in their community. In addition, citizens look to the LEPC, and its regular public meetings, as a forum for expressing these same concerns.

Information Is Not A Paper Burden. The LEPC members have learned that the Title III information is not a part of some burdensome paper exercise with no usefulness for responding to a chemical emergency. In fact, LEPC members now believe that the Title III data are very useful, if managed thoughtfully, in helping their community to better prepare for a chemical emergency.

Cooperative Attitudes Breed Cooperative Relationships. The LEPC members' experiences with facilities show that most facilities understand the objectives of the LEPC and are more than willing to help. Most companies realize that the LEPCs need this information even though it may be burdensome to their facilities. Cooperation goes a long way in developing a relationship which may be beneficial to the LEPC (access to technical resources and equipment) and the facility (better publicity and community relations.) The LEPC has found that it is better to seek the cooperation of industry in meeting the intent and spirit of Title III rather than to demand industry's participation in an adversarial manner.

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**Planning
Training
Outreach
Funding
Liability**

PIERCE COUNTY, WASHINGTON

LEPC: 37 members, including the county executive, representatives of city mayors, two State Representatives, and representatives of the county emergency management and health departments, the fire marshal, local fire districts, police, hospitals, the American Red Cross/Salvation Army, local military bases, the Sierra Club, Safety Council, citizens, media, Port of Tacoma, railroads, hazardous waste clean-up contractors, and industry. In addition, many organizations do not regularly attend LEPC meetings but are on the LEPC mailing list and contribute resources or expertise in some LEPC efforts. These organizations include labor unions, other neighboring LEPCs, universities, local libraries, and the Puget Sound Air Pollution Control Agency.

Population: 500,000, including the city of Tacoma

Facilities: 96 companies or agencies have reported on 256 facilities throughout the county. The majority of these facilities are associated with the Port of Tacoma, including major chemical manufacturing and transportation companies.

Pierce County, located south of Seattle in the southern part of the Puget Sound, includes the Port of Tacoma. This port, which accounts for 80 percent of the Title III reporting facilities within the county-wide LEPC, is one of the busiest ports on the West Coast. Pierce County also has one of the most active LEPCs on the West Coast.

One advantage Pierce County had in developing an active LEPC was the prior establishment of a planning group under the Chemical Manufacturers Association's Chemical Awareness and Emergency Response (CAER) program. The CAER program, created following the tragedy in Bhopal, India, encourages industry to work cooperatively within the community to identify chemical hazards and prepare for potential emergencies through the formation of community planning groups.

LEPC ACTIVITIES

Planning. One of the first activities in the LEPC planning process was reorganizing the county's emergency notification system. A single point of contact was named for all emergency notifications within the county, including the section 304 reporting requirement. The LEPC developed a uniform notification worksheet and distributed it to all facilities and response personnel within the county. Training programs are continuously offered on the notification system.

The LEPC is incorporating its Title III emergency planning requirements into the county's overall integrated community preparedness plan, as a specific hazardous materials component of the overall generic plan. This approach was chosen in order:

- To maintain consistency with the emergency plans being done for different hazards; and
- To avoid duplicating planning efforts and thereby waste limited resources.

To assist in developing its emergency plan, the LEPC requested each reporting facility to conduct a hazards analysis and an assessment of their response capabilities. Based on this information and the other Title III data submitted by facilities, the LEPC did a vulnerability analysis of hazards in the community. Using a mapping system, a facility can be located on a map of the county and any number of clear overlays can be added to show locations of schools, hospitals, nursing homes, etc. Other overlays display floodplains, transportation corridors, potential earthquake hazards, and other hazards. Using this planning tool, the LEPC can better identify potential hazards and affected areas in the event of a release. The LEPC is also meeting with each facility to create site plans for inclusion in the LEPC plan.

The LEPC is moving towards closer coordination with neighboring LEPCs. Initially, this multi-jurisdictional coordination is being accomplished through the sharing of LEPC meeting minutes. However, this coordination may be expanded in the future to include planning and exercising for emergencies affecting multi-jurisdictions.

Training. The LEPC has sponsored numerous hazardous materials exercises to evaluate and improve the emergency planning efforts and to foster training among responders. The LEPC has also developed and conducted many training sessions for responders on identifying hazardous materials and understanding the Title III requirements and their responsibilities — for example, a two-hour course for law enforcement personnel on recognizing and identifying hazardous materials. These courses were designed specifically for first responders such as the police and fire personnel.

Following the promulgation of the training requirements for hazardous materials responders under SARA section 126, the LEPC assisted in the development of training courses for first responders that meet those requirements. SARA section 126 requires all local emergency responders, including volunteer fire fighters, to be provided with training in understanding chemical hazards and proper safety procedures. All of the county training courses have been made available to response personnel in other counties on a limited basis.

Outreach. The LEPC has been very active in disseminating information on the Title III requirements to the regulated community and general public. Numerous seminars were conducted to provide facility representatives with detailed overviews of the Title III requirements. The LEPC held workshops on each specific Title III provision as the deadline for that requirement approached. The LEPC compared a list of all facilities located in the county prepared by the Washington Department of Labor and Industry with their list of reporting facilities. Over 4,600 non-reporting facilities were identified as potentially subject to Title III requirements. To reach these facilities, apparently unaware of the Title III requirements, the LEPC is developing an insert on the Title III requirements for the local business newspaper (circulation: 16,000).

The LEPC has provided public access to the Title III information through the public libraries throughout the county. The main branch of the Tacoma Library and the main branch of the Pierce County Library have on file the community right-to-know information submitted by facilities under Title III. Ten other branches have a workbook containing information on the Title III requirements and regulations. Facilities that inquire about Title III are referred to one of these libraries to obtain further information on Title III reporting requirements.

A brochure is being drafted to help increase awareness of hazardous materials and the public's right of access to Title III information on those hazards. Public service announcements on Title III were produced and distributed to all county television and radio stations to inform the public, including local industry, of the Title III requirements.

Funding. Basic costs for LEPC activities have been defrayed by the Pierce County Department of Emergency Management under its general operating budget and supplemented by the volunteered time of many LEPC members. In addition, the LEPC requested donations from all reporting facilities for the purchase of a computer system to help in managing the planning process and Title III community right-to-know information. The LEPC sent a letter to each reporting facility requesting a donation of \$250 towards the purchase of the Emergency Information System/Chemical (EIS/C) software. The State has endorsed this computer program as a standard for managing Title III information. Follow-up letters were sent to all facilities that did not provide donations after the first mailing. At present, over \$7,000 has been raised through this effort, enough to purchase the EIS/C software and to cover LEPC costs for postage, office supplies, printing, and some training.

Liability. During the establishment of the LEPC, many concerns were raised by LEPC members about their liability for participating in the planning process. Based on this concern, the LEPC played an active role in the passage of State legislation that provides liability protection to members of the LEPCs. One of the State Representatives on the LEPC has been a very active member from the beginning. Using his influence within the State legislature and his intimate understanding of the roles of an LEPC member, he was able to help ensure the timely passage of this legislation. The new law states that all LEPC members in Washington who, in good faith, assist in the development or review of LEPC plans are not liable for civil damages as a result of any act or omission in the development, review, or implementation of such plans. This protection does not apply to any act or omission that constitutes gross negligence or willful misconduct.

LESSONS LEARNED

Planning Helps to Prevent Chemical Accidents. The Pierce County LEPC believes that the planning process fostered under Title III and the pre-existing CAER program has helped reduce chemical hazards in the community. As a result of identification of chemical hazards and planning by the LEPC, many facilities have taken measures to prevent the possibility of serious chemical accidents, as well as to mitigate the consequences of such accidents. The knowledge gained in the county's planning efforts has lead many facilities to increase or improve their employee training programs focusing on safer handling procedures.

The LEPC also recognized that many facilities are not aware of the Title III requirements or the need for improved chemical process safety practices. Through their thorough outreach program, the LEPC has reached many of these facilities to make them aware of the requirements of Title III and, to some extent, the need for reducing chemical hazards in the community.

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STATES BY REGION

4 - Alabama	1 - Maine	10 - Oregon
10 - Alaska	3 - Maryland	3 - Pennsylvania
9 - Arizona	1 - Massachusetts	1 - Rhode Island
6 - Arkansas	5 - Michigan	4 - South Carolina
9 - California	5 - Minnesota	8 - South Dakota
8 - Colorado	4 - Mississippi	4 - Tennessee
1 - Connecticut	7 - Missouri	6 - Texas
3 - Delaware	8 - Montana	8 - Utah
3 - D.C.	7 - Nebraska	1 - Vermont
4 - Florida	9 - Nevada	3 - Virginia
4 - Georgia	1 - New Hampshire	10 - Washington
9 - Hawaii	2 - New Jersey	3 - West Virginia
10 - Idaho	6 - New Mexico	5 - Wisconsin
5 - Illinois	2 - New York	8 - Wyoming
5 - Indiana	4 - North Carolina	9 - American Samoa
7 - Iowa	4 - North Dakota	9 - Guam
7 - Kansas	5 - Ohio	2 - Puerto Rico
4 - Kentucky	6 - Oklahoma	2 - Virgin Islands
6 - Louisiana		