



**PRELIMINARY AGENDA  
NORTH CENTRAL FLORIDA  
LOCAL EMERGENCY PLANNING COMMITTEE**

Columbia County Emergency Operations Center  
263 NW Lake City Avenue, Lake City, FL 32056

June 1, 2017  
10:00 a.m., Thursday

**I. Introductions and Chair Report**

**II. Approval of February 16, 2017, Meeting Minutes \***

**III. LEPC Business Items**

- a) Tier 2 Reporting, Risk Management Program, and Hazards Analyses Survey \*
- b) Report on National Association of SARA Title III Program Officials Conference
- c) County Reports on Hazardous Materials Incidents and Activities
- d) Update of the Local Emergency Planning Committee Emergency Plan

**IV. First Responder Issues**

- a) Hazmat First Responder Training Update \*
- b) Pipeline Emergency Responders Initiative (PERI) \*
- c) Hazardous Materials Team Assessments
- d) Biennial Local Emergency Planning Committee Exercise, (1:00 pm Today)

**V. Public Information Issues**

- a) Annual Coordination Meeting with facilities - November 16, 2017, Gainesville
- b) Hazardous Materials Incidents Reports \*
- c) Distribution of Shelter In-Place Flyer and Conducting Train-The-Trainer Classes
- d) LEPC Membership Update
- e) Other Public Information Issues

**VI. Other Business and Information Requests**

**VII. Next Meeting Date and Location**

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**NORTH CENTRAL FLORIDA LOCAL EMERGENCY  
PLANNING COMMITTEE MINUTES**

Location: Gilchrist County  
Emergency Operations Center, Bell, FL

February 16, 2017  
10:00 a.m.

**MEMBERS PRESENT**

Shayne Morgan, Chair  
Frank Armijo  
Cassidy Carlile  
Sandi Courson  
Jordan Dern  
Steven 'Pat' Feagle  
Gracie Kennedy  
For Matt Harris  
Scott Holowasko  
Bruce Jordan  
Michael Laycock  
David P. McIntire  
Erin Miller  
Catlin Edwards  
Chris Gilbert  
For Augustin Olmos  
David Peaton, Vice Chair  
Ralph Smith  
Ed Ward

**MEMBERS ABSENT**

Tim Alexander  
Ken Braswell  
Todd Clifford  
Kevin Denney  
Richard Dennis  
Dave Dickens  
Matt Doty  
Jimmie Enderle  
Michael Fowler  
Robert Garbett  
Scott Garner  
Robyn Gedeon  
Ronald Grant  
Mitch Harrell  
Jeff Huffman  
Brian Johns  
Peter Kaminski  
Paul Kremer  
Henry Land  
Marc Land  
John MacDonald

**MEMBERS ABSENT**

Randy Ming  
Roger Nogaki  
Dan Still  
Tim Smoak  
Kimberly Thomas  
Ed Ward

**GUESTS PRESENT**

James Campbell

**STAFF PRESENT**

Dwayne Mundy

The meeting was called to order at 10:03 a.m.

**I. CHAIRMAN'S REPORT AND INTRODUCTIONS**

Chair Shayne Morgan welcomed everyone to the LEPC meeting and asked that they introduce themselves. Ralph Smith welcomed everyone to the Gilchrist County Emergency Operations Center and provided a facility briefing. Shayne Morgan discussed the recent State Emergency Response Commission meeting, hazardous materials symposium, and hazardous materials team self-assessments.

**II. APPROVAL OF NOVEMBER 17, 2016 MEETING MINUTES**

**Actions: It was moved by Ralph Smith and seconded by David McIntire for approval of the minutes of the November 17, 2016 meeting. The motion passed unanimously.**

III. Role of LEPC's and local responders with Risk Management Program facilities and hazardous waste generator facilities.

The group reviewed the recent Federal Register notice of rules on the Accidental Release Program requirements for enhanced coordination with local emergency responders. A summary of the changes was discussed and pertinent sections were referenced as highlighted in the Federal Register hand out.

It was noted that there is a requirement for an annual coordination meeting which the LEPC has done for the last few years.

Chris Gilbert discussed similar new requirements for small quantity and large quantity generators of hazardous waste. It was decided that the annual coordination meeting should move forward and that this should be an item that should be continually be monitored.

IV. LEPC BUSINESS ITEMS

An update on Tier Two reporting and hazards analysis was given. Dwayne Mundy reminded the group that March 1st is the deadline each year for submitting chemical inventory information online using e-plan. He said that there over 10,000 facilities that report in Florida and of this week half of them have already updated their data.

The update of the hazard analysis was discussed next. It was noted that March 1st is also the deadline of the submission of the second half of those. Dwayne Mundy stated that the Hazards Analysis Working Group will be conducting a survey of hazardous analysis hazards analysis users and Section 302 facilities to determine improvements to the program.

After a discussion, it was concluded that one enhancement would be to offer additional training on accessing information on both E-Plan, CAMEO and hazards analysis. It was decided that prior to the next LEPC meeting starting at 9 a.m. that a workshop would be held for emergency responders on accessing information using e-plan.

The group reviewed hazardous materials incident reported to the State Watch Office. This information is contained in the packet distributed for the state emergency response commission meetings.

Next, the counties reported on hazardous materials incidents and activities in their counties. Columbia County reported that in April an HSEEP training class will be held and in June a hurricane awareness class from the University of Hawaii will be presented. There was a lengthy discussion of a recent incident involving crystallized picric acid that resulted in it being exploded by the bomb squad and heard 7 to 8 miles away. There was a discussion of what old chemicals and the hazards they may present could be contained in our high schools.

Gilchrist County has scheduled a propane class to be held on April 11, 12 & 13th. This is a one day class repeated 3 times and 4 CEU's are available. Madison County reported participating in the hazards analysis site visits and a mass casualty exercise. Marion County reported that they will be participating in the upcoming hazards analysis visits. The Ocala fire department reported that they did a drill with Chaney Brothers which has a large ammonia refrigeration system.

Levy County reported that their hazards analysis are complete and that a gas pipeline presentation will be given to the County Commission soon. They said they are still busy with the impacts of Hurricane Hermine which hit the Gulf Coast earlier last year.

City of Gainesville discussed a recent response to a hazardous materials incident at Permafix. It was noted that this facility is directly across the street from the LEPC office. Michael Laycock reported that Florida Gas Transmission Company can provide good information on pipeline responses and is available to participate in table top exercises. Gracie Kennedy reported on the Department of Environmental Protection activities related to the Governors Executive Order Emergency Notice requiring facilities to report chemical releases. The group discussed that legislation is being filed during this session that will address the reporting of chemical releases.

It was announced that LEPC classes are once again able to be advertised on SERT TRAC.

## V. PUBLIC INFORMATION ISSUES

The recipients of the State Emergency Response Commission Yatabe certificates of appreciation were invited to the front and presented with certificates. It was mentioned that the winner of the Thomas Yatabe Outstanding Achievement Award was Chip Wildy from Marion County Emergency Management and his award was presented by the State Emergency Response Commission at their last meeting.

The ongoing project of distributing shelter in place flyers and conducting training was discussed.

**Action: It was moved by Chris Gilbert and seconded by Bruce Jordan to adopt the shelter in place flyer and make it available for distribution to our local governments, fire departments, and facilities. The motion passed unanimously.**

The status of the LEPC membership was discussed. It was noted that representatives from the news media and law enforcement could be used on the LEPC.

## VI. FIRST RESPONDERS ISSUES

An update was given on the hazardous materials training program. Responders were reminded to put in any request for training classes and supplies that would be needed. Updates included a train the trainer class on using the new HAZSIM air monitoring simulator.

Next the committee discussed the biennial Local Emergency Planning Committee exercise. The City of Gainesville decided that they would not participate this year in another joint multi regional LEPC exercise with the Northeast District. After a discussion, it was decided to hold a tabletop exercise after the next LEPC meeting with a scenario involving the transportation and release of aviation jet fuel. The concepts and objectives of this exercise were discussed further.

The hazardous materials response teams were reminded to please complete and return the hazardous materials team assessments. This is a multi-year effort being coordinated through the Florida State Fire College and the initial step is to do a self-assessment. Later on some teams will swap assessments with other teams to have an outside look at capabilities.

Dwayne Mundy announced that the Regional Planning Council has decided that we are unable to conduct a hazardous materials project this year which would result in additional funding being available for training purposes. It was decided that the continuation of the hazardous materials highway commodities flow study could be done by volunteers with the LEPC staff primarily collecting and entering information. It was decided that the priorities should be on identifying what other chemicals are being transported through our region. Other than gasoline, propane, and other fuels which comprise the vast majority of the observations.

#### VII. OTHER BUSINESS AND INFORMATION REQUESTS

The group was reminded that the Regional Hazardous Materials Response Team Policy Board meeting was being held in the same location today at 1:00 p.m.

#### VIII. NEXT MEETING DATE AND LOCATION

It was decided that the next meeting would be held June 1, 2017 at 10:00 a.m. at the Columbia County Emergency Operations Center in Lake City. The meeting was adjourned at 11:22 a.m.

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Chairman

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Date

| 2017 - 2018 RMP Proposed Inspection Schedule |            |                                                  |                                  |                  |       |              |      |           |
|----------------------------------------------|------------|--------------------------------------------------|----------------------------------|------------------|-------|--------------|------|-----------|
| #                                            | Date       | Facility Name                                    | Address                          | City             | Zip   | County       | LEPC | High Risk |
| 1                                            | 5/23/2017  | WAL-MART DISTRIBUTION CENTER #7023               | 6785 S.W. Enterprise Road        | Arcadia          | 34269 | Desoto       | 7    |           |
| 2                                            | 5/24/2017  | MIDULLA GENERATING STATION                       | 6697 County Road 663             | Bowling Green    | 33834 | Hardee       | 7    |           |
| 3                                            | 5/25/2017  | TROPICANA MANUFACTURING COMPANY, INC.            | 1001 13th Avenue East            | Bradenton        | 34208 | Manatee      | 8    | YES       |
| 4                                            | 6/13/2017  | DUDA FARM FRESH FOODS, INC.                      | 6000 Duda Road                   | Belle Glade      | 33430 | Palm Beach   | 10   |           |
| 5                                            | 6/14/2017  | ALDI RPB WAREHOUSE                               | 1171 North SR7                   | Royal Palm Beach | 33411 | Palm Beach   | 10   |           |
| 6                                            | 6/15/2017  | TROPICANA MANUFACTURING COMPANY, INC.            | 6500 Glades Cut-Off Road         | Fort Pierce      | 34981 | St Lucie     | 10   |           |
| 7                                            | 7/11/2017  | GORDON FOOD SERVICE PLANT CITY                   | 1402 Gordon Food Service Drive   | Plant City       | 33563 | Hillsborough | 8    |           |
| 8                                            | 7/12/2017  | C&S WHOLESALE SERVICE INC.                       | 1802 Jim Johnson Road            | Plant City       | 33566 | Hillsborough | 8    |           |
| 9                                            | 7/13/2017  | SAVE A LOT -PLANT CITY DC#025061                 | 4003 Amberjack Blvd              | Plant City       | 33566 | Hillsborough | 8    |           |
| 10                                           | 8/15/2017  | LEE COUNTY SOLID WASTE RRF                       | 10500 Buckingham Road, Suite 400 | Fort Meyers      | 33905 | Lee          | 9    |           |
| 11                                           | 8/16/2017  | AMERIGAS FORT MEYERS FL RAIL TERMINAL            | 2610 South Street                | Fort Meyers      | 33901 | Lee          | 9    |           |
| 12                                           | 8/17/2017  | CHENEY BROTHERS, Inc (PUNTA GORDA)               | 1 Cheney Way                     | Punta Gorda      | 33982 | Charlotte    | 9    |           |
|                                              |            | No Scheduled Inspections (Peak Hurricane Season) |                                  |                  |       |              |      |           |
| 13                                           | 10/17/2017 | LOUIS DREYFUS CITRUS - WINTER GARDEN             | 355 South 9th Street             | Winter Garden    | 34787 | Orange       | 6    |           |
| 14                                           | 10/18/2017 | T G LEE FOODS, LLC                               | 315 North Bumby Ave.             | Orlando          | 32803 | Orange       | 6    |           |
| 15                                           | 10/19/2017 | CCNA BASE PLACE USA                              | 2659 Orange Avenue               | Apopka           | 32703 | Orange       | 6    | YES       |
| 16                                           | 11/14/2017 | HAWKINS WATER TREATMENT GROUP - STARKE           | 419 Edwards Road                 | Starke           | 32091 | Bradford     | 3    |           |
| 17                                           | 11/15/2017 | HUNTER PANELS LLC                                | 388 Southeast Enterprise Court   | Lake City        | 32025 | Columbia     | 3    |           |
| 18                                           | 11/16/2017 | PILGRIM'S PRIDE - LIVE OAK PROCESSING PLANT      | 19740 US Highway 90 West         | Live Oak         | 32060 | Suwanee      | 3    |           |
| 19                                           | 12/5/2017  | PEACE RIVER CITRUS PRODUCTS, INC.                | 2020 US Highway 17 South         | Bartow           | 33831 | Polk         | 7    |           |
| 20                                           | 12/6/2017  | AIRGAS SPECIALTY PRODUCTS INC., DAVENPORT, FL    | 3600 County Road 547 North       | Davenport        | 33837 | Polk         | 7    |           |
| 21                                           | 12/7/2017  | BURRIS LOGISTICS - HAINES CITY                   | 100 Railroad Ave                 | Haines City      | 33844 | Polk         | 7    |           |
| 22                                           | 1/23/2017  | OMEGA PARTNERS JACKSONVILLE LLC                  | 3721 Talleyrand Avenue           | Jacksonville     | 32206 | Duval        | 4    |           |
| 23                                           | 1/24/2017  | WHITE WAVE FOODS                                 | 2198 West Beaver Street          | Jacksonville     | 32209 | Duval        | 4    | YES       |
| 24                                           | 1/25/2017  | WAL-MART DISTRIBUTION CENTER #6099               | 2686 Commerce Road               | Macclenny        | 32063 | Bakert       | 4    |           |
| 25                                           | 2/20/2018  | CITROSUCO NORTH AMERICA, INC.                    | 5937 Highway 60 East             | Lake Wales       | 33898 | Polk         | 7    | YES       |
| 26                                           | 2/21/2018  | POLK POWER STATION                               | 9995 SR 37 South                 | Mulberry         | 33860 | Polk         | 7    |           |
| 27                                           | 2/22/2018  | CUTRALE CITRUS JUICES USA, INC.- DADE CITY       | 38000 Cargill Way                | Dade City        | 33523 | Pasco        | 8    | YES       |
| 28                                           | 3/13/2018  | DELAND REGIONAL WATER RECLAMATION FACILITY       | 1101 S. Amelia Ave.              | Deland           | 32724 | Volusia      | 6    |           |
| 29                                           | 3/14/2018  | WORLD CLASS DISTRIBUTION, Inc. - DAYTONA         | 2388 MASON AVE                   | Daytona          | 32117 | Volusia      | 6    |           |
| 30                                           | 3/15/2018  | CITY OF HOLLY HILL                               | 453 LPGA Blvd.                   | Holly Hill       | 32117 | Volusia      | 6    |           |
| Standby                                      | Standby    | NV REGIONAL WASTEWATER TREATMENT FACILITY        | 507 Highway 85 North             | Niceville        | 32578 | Oakloosa     | 1    |           |
| Standby                                      | Standby    | RUSSELL STEPHENSON WTF                           | 3182 Highway 98 West             | Mary Esther      | 32569 | Oakloosa     | 1    |           |
| Standby                                      | Standby    | GEORGE F FRENCH WATER RECLAMATION FACILITY       | 14 Industrial Park Lane          | Destin           | 32541 | Oakloosa     | 1    |           |
| Standby                                      | Standby    | HARRIS FIELD WATER TREATMENT PLANT               | U.S 1 and S.W. 312 Street        | Homestead        | 33030 | Miami-Dade   | 11   |           |
| Standby                                      | Standby    | PERFORMANCE FOOD GROUP SERVICE - MIAMI           | 3595 NW 125 St                   | Miami            | 33167 | Dade         | 11   |           |
| Standby                                      | Standby    | CENTURION CARGO                                  | 4500 NW 36th Street Bldg 916     | Miami            | 33166 | Miami-Dade   | 11   |           |

III.a

# Hazards Analysis (Hazardous Materials) Survey for Florida Emergency Responders and Planners

Hazards Analysis Working Group Report, Dwayne Mundy  
SERC Meeting, May 9, 2017

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## Q1: What is your occupational category?

Answered: 261 Skipped: 0

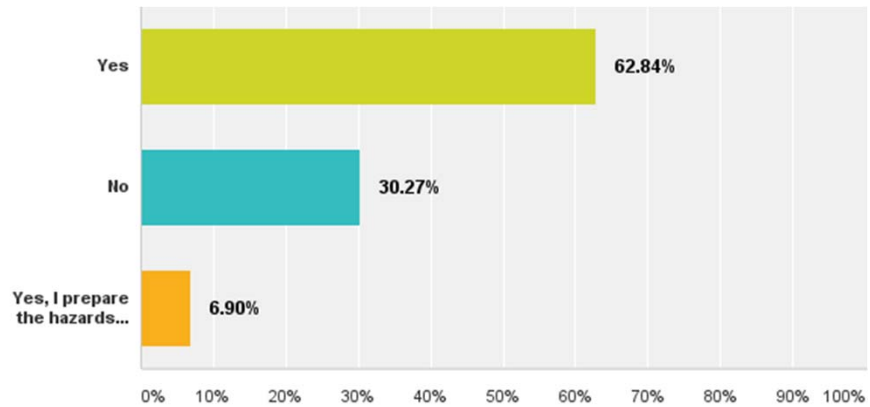
| Answer Choices                      | Responses |            |
|-------------------------------------|-----------|------------|
| Fire Department Without Hazmat Team | 2.68%     | 7          |
| Hazmat Team Member                  | 9.96%     | 26         |
| Emergency Management                | 18.01%    | 47         |
| Other Public Safety Agency          | 2.68%     | 7          |
| Facility with Hazardous Materials   | 55.56%    | 145        |
| Other (please specify)              | 11.11%    | 29         |
| <b>Total</b>                        |           | <b>261</b> |

Powered by  SurveyMonkey



### Q2: Do you know what types of information are contained in a hazards analysis for an EPCRA Section 302 site with extremely hazardous substances?

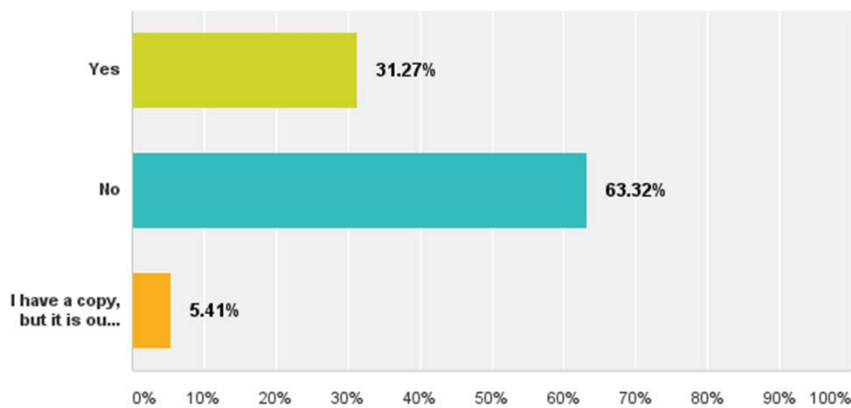
Answered: 261 Skipped: 0



Powered by  SurveyMonkey

### Q3: Do you have a copy of the current hazards analyses for your county?

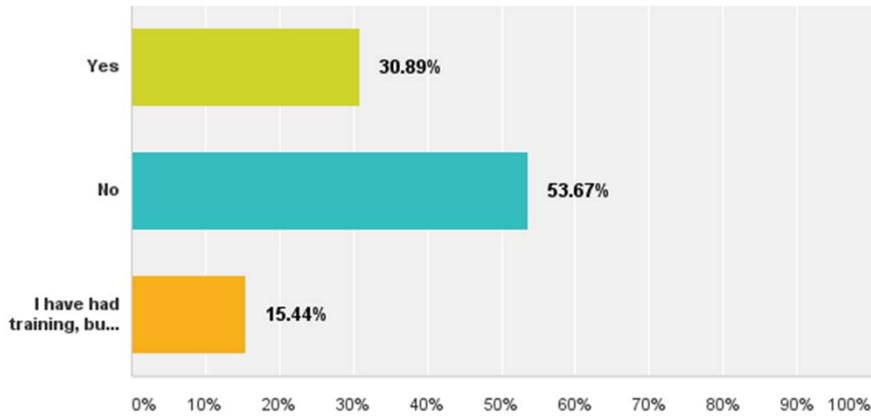
Answered: 259 Skipped: 2



Powered by  SurveyMonkey

### Q4: Do you know how to use the CAMEO program to access hazards analysis information?

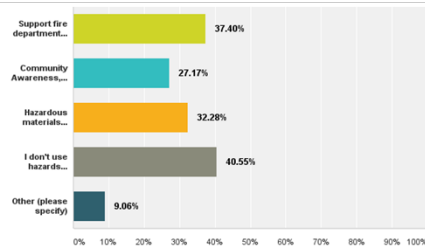
Answered: 259 Skipped: 2



Powered by SurveyMonkey

### Q5: How do you use the hazards analyses? (Check all that apply)

Answered: 254 Skipped: 7

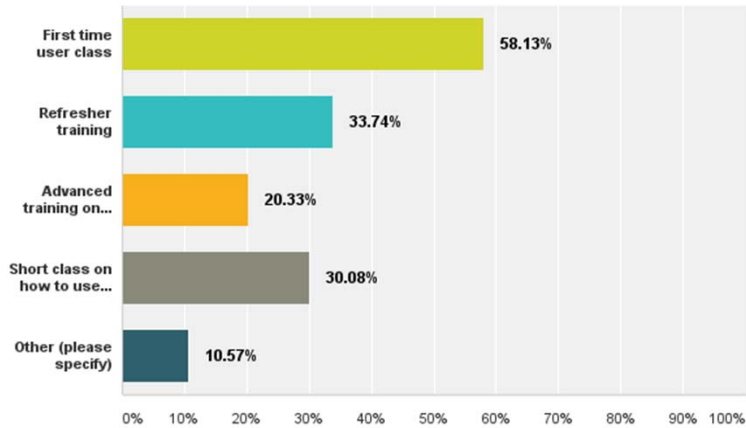


| Answer Choices                                                                            | Responses  |
|-------------------------------------------------------------------------------------------|------------|
| Support fire department pre-planning for a facility                                       | 37.40% 95  |
| Community Awareness, including identifying vulnerable populations and critical facilities | 27.17% 69  |
| Hazardous materials response planning by a hazmat team                                    | 32.28% 82  |
| I don't use hazards analyses                                                              | 40.55% 103 |
| Other (please specify)                                                                    | 9.06% 23   |
| <b>Total Respondents: 254</b>                                                             |            |

Powered by SurveyMonkey

### Q6: What sort of training does your agency need to be able to use hazards analyses in CAMEO? (Check all that apply)

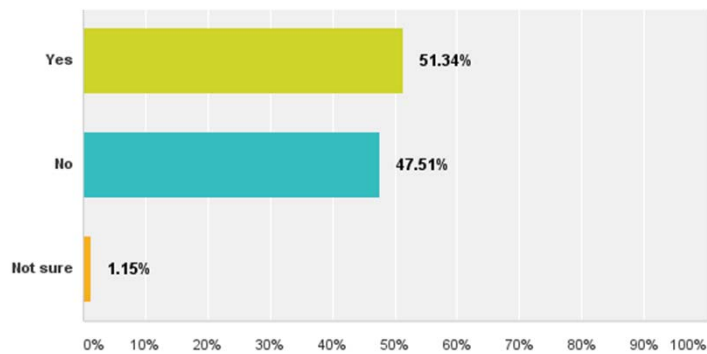
Answered: 246 Skipped: 15



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### Q8: Have you attended a Local Emergency Planning Committee (LEPC) sponsored training class, meeting or workshop during the past 12 months?

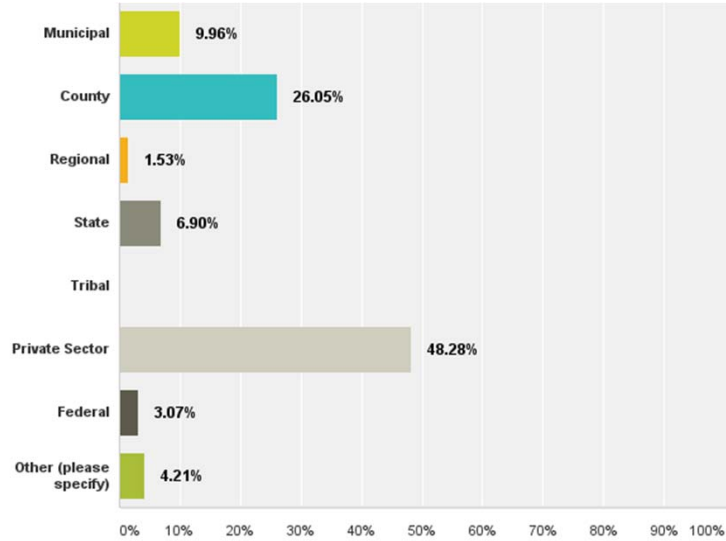
Answered: 261 Skipped: 0



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### Q9: What type of organization are you representing?

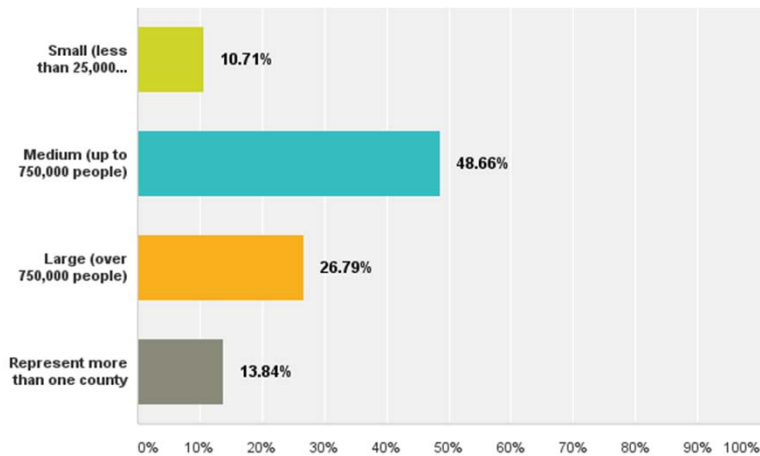
Answered: 261 Skipped: 0



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### Q10: What size county are you representing?

Answered: 224 Skipped: 37



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## Next Steps

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- Expanded training opportunities to meet multiple objectives of various user groups – Additional review of data for different user groups
- Section 302 facility list management for Hazards Analysis site
- A process where corrections to Tier 2 data identified in the Hazards Analysis process are provided to Tier 2 facilities for inclusion in future years

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## Next Steps

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- Recommendations for enhanced data collection – pipe and tank sizes (NASTTPO CAMEO class)
- Additional review of recommends collected from Question 7
- More useful structuring and sharing of HA data for responders and emergency management
- Linking E-Plan and Hazards Analysis Data?

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IV.b



# Pipeline Emergency Responders Initiative (PERI)

## North Florida Kickoff Meeting

April 20, 2017

*Arthur O. Buff, P.E.*

**CATS Program Manager  
PHMSA, Southern Region**




# Overview

- **What is PERI?**
- **Why is PERI needed?**
- **How did PERI get started?**
- **Where are we now?**
- **Where do we go from here?**





## What is a Pipeline Emergency Responders Initiative (PERI)?



**Public-private partnership among emergency response organizations and pipeline operators to improve emergency response.**

# What Do We Want to Accomplish with PERI?

- ✓ **Enhance responders understanding of pipeline risks and hazards;**
- ✓ **Strengthen relations in the interest of public safety;**
- ✓ **Improve management of pipeline emergencies nationwide**



# Regulatory Requirements

## Emergency Plans - 192.615 and 195.402

- **Written procedures for notifying appropriate fire, police, and other public officials of gas and liquid pipeline emergencies**
- **Establish and maintain liaison with appropriate fire, police, and other public officials**



## Public Awareness - 192.616 and 195.440

- **Messages to emergency responders and public officials**



# May 15, 2012 Meeting in Sandy Springs

- **Hosted by Sandy Springs Fire Chief Jack McElfish**
- **Over 50 attendees**
- **Steering Committee formed**
- **Local media coverage**





# Steering Committee Members

- ***Fire Departments***
- ***Georgia Association of Fire Chiefs (GAFC)***
- ***Georgia State Fire Fighters Association (GSFFA)***
- ***Georgia State Fire Marshall's Office***
- ***Georgia Emergency Management Agency (GEMA)***
- ***Georgia Forestry Commission (GFC)***
- ***Georgia Public Safety Training Center (GPSTC)***

- ***Georgia Municipal Association (Gas Section)***
- ***Municipal gas systems***
- ***Interstate pipeline operators (gas and liquids)***
- ***Intrastate pipeline operators (gas)***

- ***Georgia Public Service Commission (GAPSC)***
- ***Pipeline and Hazardous Material Safety Administration (PHMSA)***



# GPERI Mission Statement

***Advance the ability of Georgia emergency responders to manage pipeline emergencies through improved training, cooperation and communication with pipeline operators***



# Goals and Objectives of PERIs

- **Improve and sustain effective communication among emergency responders and pipeline operators**
- **Increase emergency responders' awareness of pipelines in their jurisdictions**
- **Establish a baseline to evaluate pipeline emergency response preparedness**
- **Identify weaknesses in existing regulatory and emergency response programs and develop solutions**
- **Develop a sustainable comprehensive pipeline emergency response training program**



# Alternative Responder Training

- **Pipeline emergency training transferred to fire-based training services**
- **Enhances credibility**
- **Maximizes emergency responder participation**
- **Recognition of specific knowledge needs of responders**
- **Eliminates one-size-fits-all approach to training**





# Training Tailored to Rank and Position

| Course                                         | Position/Rank                                         | Content                                                                                                                                                                          |
|------------------------------------------------|-------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Train the Trainer<br>16-hour                   | Hazmat teams, command officers, trainers              | In-depth focus on pipeline emergencies; instructor qualification                                                                                                                 |
| Command Module<br>4-hour                       | Law enforcement, EMS, emergency managers, fire chiefs | Provides strategic awareness; Focused on NIMS & ICS, unified command, Incident Action Plan, pre-planning for incidents                                                           |
| Company Officer & Firefighter Module<br>8-hour | Rank & file firefighters (volunteer or paid)          | Focused on scene safety, initial incident command, size-up, prompt notification of operator, assistance requests, ordering of resources                                          |
| 911 Dispatch Module<br>4-hour                  | E-911 operators                                       | Provides detailed information on pipelines in jurisdiction, product risks and hazards, questions to ask when pipeline emergency reported, what to communicate to operators & ERs |



# Tim Butters Addressing Georgia Fire Chiefs



# PHMSA's Finest





# Colonial Pipeline Display



# GPRI Emphasis on Prevention

- **Response important, but prevention says lives**
- **Damage Prevention content incorporated into “Pipeline Emergencies” course**
  - **Role & importance of 811**
  - **Underground utility locating process**
  - **Excavation awareness (how to tell if a line has been located at a working job site)**



# Ensuring Sustainable Funding



- **For the program to be a long term solution, it must have a sustainable funding stream.**
- **Pipeline operators spend significant dollars today to meet regulatory requirements associated with liaison requirements and public education.**

**Let's Spend Them Smarter ...**





# Status of PERIs



FL LA  
CO IA  
PA NJ



[www.phmsa.dot.gov/pipeline/safety-awareness-and-outreach/PERI](http://www.phmsa.dot.gov/pipeline/safety-awareness-and-outreach/PERI)



# Challenges Moving Forward with PERI

- **Providing sustainable pipeline safety training for ERs**
- **Overcoming low priority placed on pipeline emergencies training**
- **Key emergency responder participation**
- **Meeting logistics**
- **Increased demands on time of ERs**
- **Establishing baseline to measure progress**
- **Establishing entity and funding to sustain program**





# PERI Assistance



**\$300,000**  
**interagency/intra-agency**  
**agreement with VOLPE –**  
**executed August 23<sup>rd</sup>**

**VOLPE – The National Transportation Systems Center –  
Cambridge, MA**



# Why will PERIs Succeed?

**BECAUSE EVERYONE  
BENEFITS**



20

20





**Arthur O. Buff, P.E.**  
**CATS Program Manager**  
**PHMSA – Office of Pipeline Safety**  
**Southern Region**  
**[arthur.buff@dot.gov](mailto:arthur.buff@dot.gov)**  
**404-832-1155**





V.b

STATE OF FLORIDA

**DIVISION OF EMERGENCY MANAGEMENT**RICK SCOTT  
GovernorBRYAN W. KOON  
Director

April 19, 2017

MEMORANDUM - # 08-17

TO: Members of the State Emergency Response Commission  
(SERC) for Hazardous Materials

FROM: Bryan W. Koon, Chairman

SUBJECT: Hazardous Materials Incidents Report

**SUMMARY:** The attached tables and graphs provide information on all hazardous materials incident reports received by the State Watch Office for the period of up to January 1, 2002 through February 28, 2017. Incident reports are reviewed by staff on a daily basis for compliance with Section 304 and other provisions of the Emergency Planning and Community Right-to-Know Act (EPCRA) program. They can also be used to identify facilities that may have an obligation to report under the Risk Management Planning (RMP) program.

The "Potential Section 304 Investigations" information in Table 1 is listed by Local Emergency Planning Committee (LEPC) District. These are incidents involving the release of an Extremely Hazardous Substance (EHS) or a Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) chemical at a fixed facility. In order for an incident to be covered under Section 304, the EHS or CERCLA chemical must meet or exceed its designated Reportable Quantity (RQ) and have potential for offsite exposure. Those facilities found not to be in compliance with all Section 304 reporting requirements are referred to the Division of Emergency Management's General Counsel for possible enforcement action. The incidents listed in Table 2 cover hazardous materials incidents for which evacuations, injuries and/or deaths were reported. The numbers for these tables were obtained from the State Watch Office incident reports, as well as other sources. This information is still being recorded and is available upon request.

The figures in Graph I show the total number of hazardous materials incidents per year (including Section 304) reported to the State Watch Office for the period of January 1, 2002 through February 28, 2017. The figures in Graph II compare incidents that occurred at fixed facilities to those involving transportation-related incidents during the past 12 months (December 1, 2016 through February 28, 2017). And note that the incidents in Graph II have been further refined to list petroleum vs. non-petroleum incidents for both fixed and transportation related incidents.

BWK/rb

Attachments

**Hazardous Materials Incident Report - Table I**  
**12/1/2016 Thru 2/28/2017**  
**Potential Section 304 Investigations**

**01- West Florida Regional Planning Council**

| County   | Release Date | Chemical Name | Release Amt | Business Type         | Comment               | Sector  |
|----------|--------------|---------------|-------------|-----------------------|-----------------------|---------|
| Escambia | 02/25/17     | Sulfuric Acid | 87          | Plastics Material and | Underground pipe leak | Private |

**02- Apalachee Regional Planning Council**

| County | Release Date | Chemical Name    | Release Amt | Business Type      | Comment                       | Sector  |
|--------|--------------|------------------|-------------|--------------------|-------------------------------|---------|
| Leon   | 12/01/16     | Hydrogen Sulfide | Unknown     | Hobby/Retail Sales | Law Enforcement Investigation | Private |

**03- North Central Florida Regional Planning Council**

| County  | Release Date | Chemical Name | Release Amt | Business Type   | Comment           | Sector  |
|---------|--------------|---------------|-------------|-----------------|-------------------|---------|
| Alachua | 01/05/17     | Acetone       | Unknown     | Hazardous Waste | Flammable, closed | Private |
| Dixie   | 12/09/16     |               | Unknown     | Unknown         | closed            | Private |

**04- Northeast Florida Regional Planning Council**

| County    | Release Date | Chemical Name                     | Release Amt | Business Type    | Comment                             | Sector  |
|-----------|--------------|-----------------------------------|-------------|------------------|-------------------------------------|---------|
| Clay      | 01/10/17     | Peroxide-base pesticide           | Unknown     | Produce Facility | OSHA Investigation                  | Private |
| Duval     | 12/27/16     | Diethylene Glycol Monobutyl Ether | 209         | Transportation   | Hanger firesuppression foam release | Private |
| Duval     | 02/17/17     | Hydraulic OIL                     | 375         | Railroad         | Crane mechanical malfunction        | Private |
| Nassau    | 01/24/17     | Mercury                           | 0.9         | Crime Lab        | closed                              | Public  |
| St. Johns | 02/17/17     | Sulfuric Acid                     | Unknown     | Traffic Accident | batteries leaking                   | Private |

06- East Central Florida Regional Planning Council

| County   | Release Date | Chemical Name       | Release Amt | Business Type     | Comment                     | Sector  |
|----------|--------------|---------------------|-------------|-------------------|-----------------------------|---------|
| Lake     | 02/17/17     | Anhydrous Ammonia   | 289         | Citrus Production | Ammonia pump malfunction    | Private |
| Lake     | 02/22/17     | Anhydrous Ammonia   | 708         | Citrus Production | Ammonia pipe burst, release | Private |
| Seminole | 12/28/16     | Sodium Hypochlorite | 724         | Water Treatment   | Employee accidental release | Public  |

07- Central Florida Regional Planning Council

| County    | Release Date | Chemical Name                 | Release Amt   | Business Type         | Comment                         | Sector  |
|-----------|--------------|-------------------------------|---------------|-----------------------|---------------------------------|---------|
| Highlands | 01/30/17     | Sulfuric Acid Solution 50%    | 920           | Farm - Not Reg. as    | closed                          | Private |
| Polk      | 12/26/16     | Phosphoric Acid               | 138           | Fertilizer Plant      | Employee accidental release     | Private |
| Polk      | 01/04/17     | Diesel Fuel / Ethylene Glycol | 740 / Unknown | Traffic Accident      | transportation accident, closed | Private |
| Polk      | 01/10/17     | Anhydrous Ammonia             | 10            | Fertilizer Production | closed                          | Private |
| Polk      | 01/11/17     | Sodium Hypochlorite           | 28            | Traffic Accident      | transportation accident, closed | Private |

08- Tampa Bay Regional Planning Council

| County       | Release Date | Chemical Name                           | Release Amt    | Business Type     | Comment                           | Sector  |
|--------------|--------------|-----------------------------------------|----------------|-------------------|-----------------------------------|---------|
| Hillsborough | 12/01/16     | ETHYLENE GLYCOL                         | 45             | Transportation    | transportation accident, closed   | Private |
| Hillsborough | 12/14/16     |                                         | 8              | Transportation    | transportation accident, closed   | Private |
| Hillsborough | 12/17/16     | Hydrochloric Acid                       | 10             | Boat              | environmental crime               | Private |
| Hillsborough | 12/19/16     | AFFF Foam "Diethylene Glycol Monobutyl" | Unknown        | Fire Department   | fire suppression release          | Public  |
| Hillsborough | 01/25/17     | Muriatic Acid                           | 9.5            | Transportation    | environmental crime               | Private |
| Hillsborough | 02/26/17     | Sodium Hypochlorite                     | 99             | WTP               | Underground pipe leak             | Public  |
| Pinellas     | 12/10/16     | Sodium Hypochlorite                     | 89             | Wastewater        | Employee accidental release       | Public  |
| Pinellas     | 02/02/17     | Aluminum Sulfate                        | 8796 (this was | Water Treatment   | Employee's not following RAGAGEPS | Public  |
| Pinellas     | 02/12/17     | Mercury                                 | 0.8            | Apartment Complex | closed                            | Private |
| Pinellas     | 02/14/17     | Sodium Hydroxide (50% diluted)          | 3603           | Reverse Osmosis   | closed                            | Public  |

09- Southwest Florida Regional Planning Council

| County | Release Date | Chemical Name            | Release Amt | Business Type       | Comment | Sector  |
|--------|--------------|--------------------------|-------------|---------------------|---------|---------|
| Hendry | 12/01/16     | Natural Gas Leak/Propane | Unknown     | Pipeline            | closed  | Private |
| Hendry | 01/09/17     | bleach release           | Unknown     | Chemical and Allied | Bleach  | Private |
| Lee    | 02/14/17     | Copper Sulfate           | 42          | Unknown             | closed  | Private |
| Lee    | 02/22/17     | Sodium Hypochlorite      | 112         | Water Supply and    | closed  | Public  |

10- Treasure Coast Regional Planning Council

| County     | Release Date | Chemical Name       | Release Amt | Business Type     | Comment                | Sector  |
|------------|--------------|---------------------|-------------|-------------------|------------------------|---------|
| Broward    | 01/12/17     | Sodium Hypochlorite | 675         | Retail Sales/Pool | Mechanical malfunction |         |
| Martin     | 01/21/17     | Sodium Hypochloride | 2699        | Pipeline          | Mechanical malfunction | Public  |
| Palm Beach | 12/23/16     | Sodium Hypochlorite | Unknown     | Traffic Accident  | traffic accident       | Private |
| Palm Beach | 12/29/16     | Hydraulic OIL       | 375         | Traffic Accident  | traffic accident       | Private |

11- South Florida Regional Planning Council

| County     | Release Date | Chemical Name    | Release Amt | Business Type   | Comment                | Sector  |
|------------|--------------|------------------|-------------|-----------------|------------------------|---------|
| Miami-Dade | 01/27/17     | Sodium Hydroxide | 3186        | Water treatment | Mechanical malfunction | Private |

## Hazardous Materials Incident Report - Table II

12/1/2016 Thru 2/28/2017

## Hazardous Materials &amp; Traffic Incidents with Evacuations, Injuries, and Deaths

**01-West Florida Regional Planning Council**

| County | Release Date | Chemical Name      | Release Amt | Business Type    | Evacuated | Injured | Fatalities | Injury/Death chemical related |
|--------|--------------|--------------------|-------------|------------------|-----------|---------|------------|-------------------------------|
| Walton | 01/02/17     | Gasoline or Diesel | 52          | Traffic Accident |           | 1       |            |                               |

**02 - Apalachee Regional Planning Council**

| County | Release Date | Chemical Name     | Release Amt | Business Type      | Evacuated | Injured | Fatalities | Injury/Death chemical related |
|--------|--------------|-------------------|-------------|--------------------|-----------|---------|------------|-------------------------------|
| Leon   | 12/01/16     | Hydrogen Sulfide- | Unknown     | Hobby/Retail Sales | 1         | 1       | 1          | Possible Chemical Suicide     |

**03-North Central Florida Regional Planning Council**

| County  | Release Date | Chemical Name      | Release Amt | Business Type    | Evacuated | Injured | Fatalities | Injury/Death chemical related |
|---------|--------------|--------------------|-------------|------------------|-----------|---------|------------|-------------------------------|
| Alachua | 01/02/17     | Gasoline or Diesel | 7           | Traffic Accident |           | 1       |            |                               |

**04-Northeast Florida Regional Planning Council**

| County | Release Date | Chemical Name | Release Amt | Business Type         | Evacuated | Injured | Fatalities | Injury/Death chemical related |
|--------|--------------|---------------|-------------|-----------------------|-----------|---------|------------|-------------------------------|
| Clay   | 01/10/17     | Peroxide-base | Unknown     | Produce Facility      | 7         | 4       |            |                               |
| Nassau | 01/28/17     | Natural Gas   | Unknown     | Pipeline/Construction | 1         |         |            |                               |



**06-East Central Florida Regional Planning Council**

| County   | Release Date | Chemical Name      | Release Amt | Business Type           | Evacuated | Injured | Fatalities | Injury/Death chemical related |
|----------|--------------|--------------------|-------------|-------------------------|-----------|---------|------------|-------------------------------|
| Orange   | 01/29/17     | Diesel Fuel        | 148         | Traffic Accident        |           | 1       |            |                               |
| Orange   | 02/23/17     | Hydraulic OIL      | 188         | Traffic Accident        |           | 1       |            |                               |
| Osceola  | 02/17/17     | Natural Gas        | Unknown     | Pipeline / Construction | 2         |         |            |                               |
| Seminole | 12/27/16     | Freon              | 200         | Retail Sales            | 1         |         |            |                               |
| Volusia  | 12/27/16     | Kerosene-Jet Fuel  | 640         | Aircraft Accident       |           |         | 2          | N/A                           |
| Volusia  | 01/14/17     | Gasoline or Diesel | Unknown     | Traffic Accident        |           | 1       |            |                               |
| Volusia  | 02/21/17     | Diesel Fuel        | 333         | Traffic Accident        |           | 1       |            |                               |

**07-Central Florida Regional Planning Council**

| County | Release Date | Chemical Name       | Release Amt | Business Type    | Evacuated | Injured | Fatalities | Injury/Death chemical related |
|--------|--------------|---------------------|-------------|------------------|-----------|---------|------------|-------------------------------|
| Polk   | 01/11/17     | Sodium Hypochlorite | 28          | Traffic Accident |           | 7       |            |                               |
| Polk   | 01/24/17     | Diesel Fuel         | 185         | Traffic Accident |           | 1       |            |                               |
| Polk   | 02/27/17     | Diesel Fuel         | 111         | Traffic Accident |           | 1       |            |                               |

**08-Tampa Bay Regional Planning Council**

| County       | Release Date | Chemical Name | Release Amt | Business Type               | Evacuated | Injured | Fatalities | Injury/Death chemical related |
|--------------|--------------|---------------|-------------|-----------------------------|-----------|---------|------------|-------------------------------|
| Hillsborough | 12/08/16     |               |             | Condo                       |           | 2       |            |                               |
| Hillsborough | 01/03/17     | Natural Gas   | Unknown     | Construction                | 1         |         |            |                               |
| Hillsborough | 02/21/17     | Propane       | Unknown     | Transportation/Garbage      | 8         |         |            |                               |
| Hillsborough | 02/22/17     | Natural Gas   | Unknown     | Retail Sales/Pipeline       | 2         |         |            |                               |
| Pinellas     | 01/22/17     | Natural Gas   | Unknown     | Apartment Complex           | 1         |         |            |                               |
| Pinellas     | 02/03/17     | Natural Gas   | Unknown     | Private Residence / Traffic | 3         |         |            |                               |

**09-Southwest Florida Regional Planning Council**

| County  | Release Date | Chemical Name   | Release Amt | Business Type       | Evacuated | Injured | Fatalities | Injury/Death chemical related |
|---------|--------------|-----------------|-------------|---------------------|-----------|---------|------------|-------------------------------|
| Collier | 02/21/17     | Diesel Fuel/OIL | Unknown     | Traffic Accident    |           | 1       |            |                               |
| Hendry  | 01/09/17     | See main form   |             | Chemical and Allied |           | 1       |            |                               |
| Lee     | 02/12/17     | Gasoline        | 259         | Traffic Accident    |           | 1       |            |                               |

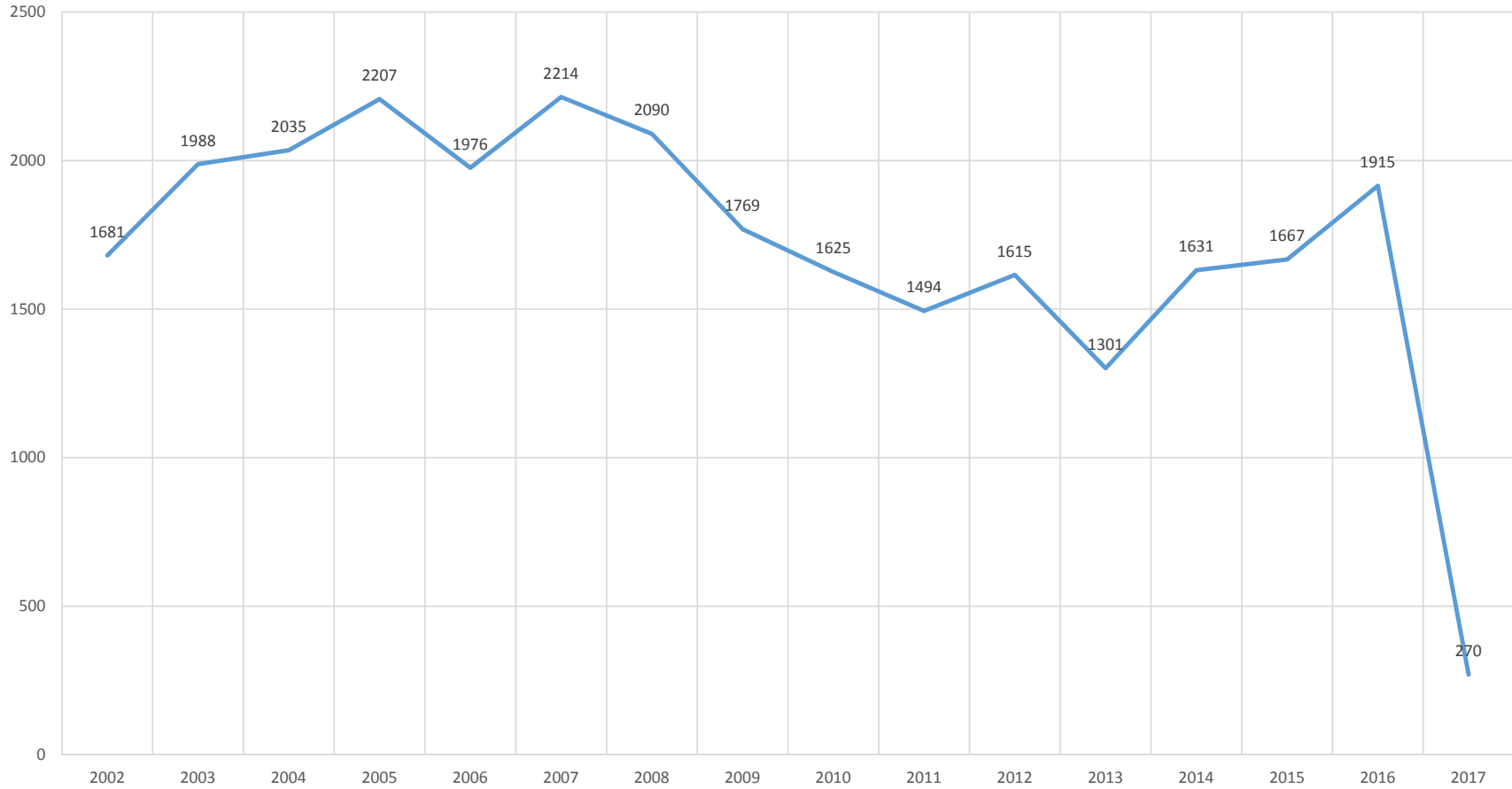
**10-Treasure Coast Regional Planning Council**

| County     | Release Date | Chemical Name | Release Amt | Business Type           | Evacuated | Injured | Fatalities | Injury/Death chemical related |
|------------|--------------|---------------|-------------|-------------------------|-----------|---------|------------|-------------------------------|
| Broward    | 12/02/16     | Natural GAS   | Unknown     | School/Pipeline         | 1         |         |            |                               |
| Broward    | 12/13/16     | Diesel Fuel   | 925         | Traffic Accident        |           | 1       |            |                               |
| Broward    | 02/03/17     | Natural Gas   | Unknown     | Pipeline/ Mobile Home   | 4         |         |            |                               |
| Broward    | 02/21/17     | Propane       | Unknown     | School                  | 1650      |         |            |                               |
| Palm Beach | 12/07/16     | Natural Gas   | Unknown     | Retail                  | 1         |         |            |                               |
| Palm Beach | 12/09/16     | Natural Gas   | Unknown     | Pipeline/Construction   | 1         |         |            |                               |
| Palm Beach | 12/23/16     | Natural Gas   | Unknown     | Private Residence       | 3         |         |            |                               |
| Palm Beach | 02/23/17     | Natural Gas   | Unknown     | Pipeline / Construction | 2         |         |            |                               |

**11-South Florida Regional Planning Council**

| County     | Release Date | Chemical Name | Release Amt | Business Type    | Evacuated | Injured | Fatalities | Injury/Death chemical related |
|------------|--------------|---------------|-------------|------------------|-----------|---------|------------|-------------------------------|
| Miami-Dade | 02/24/17     | Diesel Fuel   | 444         | Traffic Accident |           | 1       |            |                               |
| Monroe     | 01/31/17     | Gasoline      | Unknown     | Traffic Accident |           | 1       |            |                               |

Graph I  
Hazardous Materials Incident Reports  
January 1, 2002 through February 28, 2017



5304-2017  
CONTINUOUS Release

**EMERGENCY PLANNING AND COMMUNITY RIGHT-TO-KNOW ACT  
POULTRY OPERATIONS AND CONTINUOUS RELEASE**

**INITIAL WRITTEN REPORT**

**FOLLOW UP REPORT**  
(to EPA Regional Office Only, within 30 days of the first anniversary of the initial written report)

Date: 4/5/17

Date of Initial Notification Call: 4/5/17

State Emergency Response Commission

Local Emergency Planning Commission

Name: Chris Stevens

Name: Dwayne Mundy North Cent. FL Regional Plan

Address: 2555 Shumard Oak Blvd Tallahassee, FL 32399

Address: 2009 NW 67th Pl Gainesville FL 32653

**Section I: General Information-Facility Information**

Name of Farm: Cal - Maine Foods Inc Lake City

Farm Address: 247 NW Hillandale Glen Lake City FL 32055  
Street City

State Zip Code

Location of Farm: 30.3012537  
Latitude (degrees/min/sec)

-82.7055145, 17  
(Longitude (degrees/min/sec))

Farm Owner: Jeff Huth (GM)

Telephone Number: 386 - 397 - 1300

**Section II: General Information-Population Information**

1. Estimated range of the population with in one mile of your farm, (Circle One)

0-50 persons    51-100 persons    101-500 persons    501-1000 persons    Over 1000 persons

2. To the best of your knowledge are there any schools or daycare centers within one mile of your farm?

Yes \_\_\_\_\_ No

If yes, estimate distance in miles and direction: \_\_\_\_\_ (e.g. ¼ mile northwest)

3. To the best of your knowledge are there any hospitals within one mile of your farm?

Yes \_\_\_\_\_ No

If yes, estimate distance in miles and direction \_\_\_\_\_ (e.g. ¼ mile northwest)

4. To the best of your knowledge are there any retirement communities within one mile of your farm?

Yes \_\_\_\_\_ No

If yes, estimate distance in miles and direction \_\_\_\_\_ (e.g. ¼ mile northwest)

**RECEIVED**

APR 14 2017

NORTH CENTRAL FLORIDA  
REGIONAL PLANNING COUNCIL

**Section III: Source Information**

Poultry (Permitted Capacity of Layers/Pullets ≈ 1.5 million)

**Environmental Medium**

Ammonia and/or hydrogen sulfide from poultry operations is generated from the natural breakdown of poultry manure. The process is continuous and stable. The medium affected from ammonia generated during this breakdown is air.

**Identity and Quantity of Hazardous Substance**

This operation may generate routine or continuous air emissions of ammonia or other hazardous substance from animal waste that may be in excess of the reportable quantity of 100 lbs/day. The U.S. EPA has been studying air emissions from animal agricultural operations, but has not yet issued guidance or methods for estimating agricultural emissions. I do not have the scientific equipment to measure how much I emit on a daily basis and am not able to reasonably estimate or determine the actual amount of emissions from this farm. However, a study titled "Ammonia, Methane, Nitrous Oxide and Particulate Matter Emissions From Two Different Buildings for Laying Hens" performed by C. Fabbri, et. al. indicated that the average daily ammonia emission was roughly 0.93 lbs/day/1,000 hens. While this value may be appropriate for the specific farm studied, release from my farm may vary based on several factors, including the production system utilized, age of the birds, on farm maintenance and atmospheric and other environmental conditions.

[Additionally, based on our participation in the U.S. EPA Animal Feeding Operation Air Compliance Agreement, we believe we are exempt from reporting air emissions from our animal waste.] However, we are submitting this report in good faith effort to comply with CERCLA Section 103 and/or EPCRA Section 304.

**Certification Statement**

I certify that the hazardous substance release described herein is continuous and stable in quantity and rete under the definition in 40 CFR 302.8 (b) or 355.32 and that all submitted information is accurate and current to the best of my knowledge.

Shane Mart

Print Name

  
Signature

Area Compliance

Position

4/5/17  
Date

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APR 14 2017

NORTH CENTRAL FLORIDA  
REGIONAL PLANNING COUNCIL

304-2017



**ONE BUCKEYE DRIVE  
PERRY, FLORIDA 32348-7702**

May 1, 2017

Mr. Bryan Koon - Director  
State Emergency Response Commission  
2555 Shumard Oak Boulevard  
Tallahassee, Florida 32399-2100

**Re: Foley Cellulose LLC  
Reportable Release – Citric Acid 4/25/2017  
NRC Incident Report #1176546  
State Watch Office Report #20173060**

Dear Director Koon,

Pursuant to 40 CFR 355.40(b), Foley Cellulose LLC (Foley Mill) is submitting this follow-up correspondence to update and correct the initial verbal notification to the National Response Center (NRC) and State and local agencies made on April 25, 2017, concerning the release of citric acid to soil at the Foley Mill located in Perry, FL. To satisfy the immediate reporting requirement the Foley Mill submitted a verbal notification to the NRC at 10:21 a.m. on April 25, 2017 as required under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and to the State Emergency Response Committee (SERC) and Local Emergency Planning Committee (LEPC) under the Emergency Planning and Community Right-to-Know Act (EPCRA). The Foley Mill is submitting this report to provide additional information not known or available at the time that the verbal report was made. Specifically, the Foley Mill is updating the quantity released and incident investigation.

**Incident Investigation and Background (40 CFR 355.40(a)(1)(2), (b)(1))**

The Foley Mill occasionally uses citric acid in the pulp drying process. Citric acid is stored in a bulk storage tank located in the water treatment area of the Mill. The citric acid is pumped from the citric acid storage tank located in the water treatment area to a citric acid day tank located in the pulp drying area. The citric acid day tank is located inside a building, away from the high traffic process area and stored in an area of the building that is lined with concrete flooring. Concrete curbing and a floor drain that leads to the wastewater treatment system are in place to capture any spilled material for treatment.

The pulp drying area began preparing for an upcoming production run that would utilize citric acid on the morning of April 21, 2017. A pulp drying area operator inspected the citric acid day tank, valves, piping, and tested the associated pumps. No citric acid leaks were identified during the inspection. At the time of the inspection, the citric acid day tank had a level of approximately 5.2 feet. At 3:38 p.m. on April 21, 2017, the citric acid transfer pump was placed in automatic mode by the water treatment operator, which allows citric acid to automatically pump from the water treatment citric acid storage tank to the citric acid day tank when the day tank reaches a specified low tank level. Based on a review of the trend of the level in the citric acid day tank, the tank level began to drop at 1:51 p.m. on April 21, 2017. The citric acid supply system pump initially activated at 5:14 p.m. on April 21, 2017, pumping citric acid from the citric acid storage tank to the citric acid day tank. The citric acid supply pump then deactivated once the citric acid day tank reached a specified set-point. A review of the citric acid day tank levels showed that the level slowly dropped for approximately 14 hours until it reached a low level set-point and the citric acid supply system pump automatically reactivated to fill the day tank from the storage tank. The process of automatically refilling the day tank when the day tank level dropped below its refill level continued until the citric acid storage tank ran empty at 3:37 p.m. on April 24, 2017.

A pulp drying operator discovered that the citric acid day tank was empty on the morning of April 25, 2017 and promptly began an investigation. The process was checked to determine if the citric acid recently had been utilized in the process. When it was determined that the citric acid had not been used in the process, the citric acid day tank was filled with water to check the integrity of the day tank. The day tank did not have any leaks, but an operator noticed signs of fluid discharging at the opening of one of the drain valves. The operator slightly opened the suspect drain valve and allowed a small stream of water to be released from the tank. The operator then followed the flow of the water underneath the tank to a small hole in the containment in front of the floor drain and adjacent to the day tank. The Foley Mill believes that the citric acid drained through the hole and onto soil. The rate of citric acid released from the day tank was estimated to be relatively slow based on a review of the level changes in the tank. Combined with the dry condition of the floor drain, the Foley Mill estimates that the citric acid released was not discharged through the floor drain, but through the small hole in the concrete containment flooring.

The Environmental Department was then notified to assist in the ongoing investigation. Two pH samples were taken using test strips in the area around the hole in the containment flooring and below the tank at approximately 10:00 a.m. on April 25, 2017. Both sample strips indicated a pH of 1. The Environmental Department then reviewed the Safety Data Sheet (SDS) for citric acid and generated an estimate of the quantity of citric acid released based on the size of the citric acid storage tank along with tank level data from the period of time in question. Using this information, the Foley Mill calculated that 7,423 gallons of citric acid had been removed from the storage tank. The Foley Mill then assumed that the total quantity of citric acid exited the area through the hole in the concrete containment flooring to the underlying soil. The Foley Mill later determined that there was approximately 1,040 gallons of citric acid in the citric acid day tank that had been released, bringing the total release to 8,463 gallons.

Based on these calculations and related assumptions, the Foley Mill determined at approximately 10:16 a.m. on April 25, 2017 that the reportable quantity (RQ) for hazardous waste, Corrosivity - pH less than 2, was exceeded. As required by CERCLA and EPCRA immediate notifications were made to the proper authorities.

**Estimated Quantity, Duration, Medium of Release (40 CFR 355.40(a)(3)(4)(5))**

The Foley Mill estimates that the release of citric acid occurred between 1:51 p.m. on April 21, 2017 and 4:11 a.m. on April 25, 2017, during which time approximately 8,463 gallons (7,423 gallons from a citric acid storage tank (via transfer to the day tank) and 1,040 gallons from a citric acid day tank) was released to soil. These quantity calculations are based on tank level change and diameter.

*Citric Acid Storage Tank:*  $3.89 \text{ ft} \times \pi(18 \text{ ft}/2)^2 \times 7.4805 \text{ gal}/\text{ft}^3 = 7,423 \text{ gal}$

*Citric Acid Day Tank:*  $5.2 \text{ ft} \times 200 \text{ gal}/\text{ft} = 1,040 \text{ gal}$

**Release Amount (24-hour period):**

$8,463 \text{ gal.} \times 62.4 \text{ lb}/\text{ft}^3 \times \text{ft}^3/7.4805 \text{ gal.} \times 1.24 \times 1/4 = 21,885 \text{ lbs}/\text{day}$

Note: The specific gravity of citric acid is 1.24.

**Corrective Actions/Precautions Taken (40 CFR 355.40(a)(7))**

**Evacuation** - Evacuation of the facility or surrounding communities was not required. There were no known off-site impacts and no recommended/required actions by off-site personnel.

**Notifications** – The Foley Mill notified the National Response Center (NRC), Florida Department of Emergency Management's State Watch Office (SERC), North Central Florida Regional Planning Council (LEPC), Taylor County Emergency Management Agency, and the Florida Department of Environmental Protection's (FDEP) Northeast District. Follow-up calls were received from the FDEP Regional District – Tallahassee and the Environmental Protection Agency (EPA) Region 4.

**Corrective Actions** – The corrective actions taken as a result of this incident included: repairing the concrete floor in the area of the citric acid day tank, revising procedures to include regular inspections whenever the citric acid storage tank pump is in automatic, adding alarms to the citric acid day tank, adjusting the operating ranges on the citric acid day tank and providing visual monitoring of chemical usage when citric acid is utilized.

**Exposure/Injuries (40 CFR 355.40(a)(6), (b)(2), (b)(3))**

No injuries occurred. There were no known or anticipated acute or chronic health risks to any individuals associated with the release.

If there are any further questions or if any additional information is required, please contact Brooks Butler at (850) 371-2288 or [Brooks.Butler@gapac.com](mailto:Brooks.Butler@gapac.com) or Erin Underwood at (850) 371-4159 or [Erin.Underwood@gapac.com](mailto:Erin.Underwood@gapac.com).



**Certification by Responsible Official**

Based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate and complete.

Sincerely,

A handwritten signature in black ink, appearing to read "Lee Davis". The signature is fluid and cursive, with the first name "Lee" being more prominent than the last name "Davis".

Lee Davis.  
Vice President – General Manager  
Foley Cellulose LLC

cc:

Mr. Dwayne Mundy (North Central Florida Local Emergency Planning Council)  
Mr. Steve Spradley (Taylor County Emergency Management)  
Mr. Marc Lovallo (FDEP – Northeast District)

Graph II  
 Florida Hazardous Materials Report  
 December 1, 2016 to February 28, 2017

