

March 29, 2023
Greater Houston Local Emergency Planning Committee
Bi-Monthly Meeting Notes

Logistics

10:00AM – 12:00PM

American Red Cross, 2700 Southwest Freeway, Houston, TX 77098

Welcome

Business

Chair/Vice Chair Report

Tier II Reporting & Database Access

Emergency Plans

Houston Community College Resiliency Center of Excellence

Treasurer Report

Funds are low; identifying opportunities to raise funds

November Exercise After Action Report – see the After Action Report Summary below

Meeting Notes (available at <https://ghlepc.org/information>)

Introductions

Local Updates

TCEQ Updates

EPA Updates

New Business

Plan for Election of Officers

PIO Report

Houston Fire Department Updates

Member Reports

Presentation:

Captain Dana Brown, HazMat Exercise Review and Electrical Vehicle and Lithium Battery Preparedness

Next Meeting: Wednesday, May 31, 2023

Federal Updates

- EPA **Recycle City**, a newly updated interactive game where you can make the city even greener!
- EPA Announces Agreement with **TPC Group LLC to Correct Alleged Clean Air Act Violations** at its Houston, Texas Facility (<https://www.epa.gov/newsreleases/epa-announces-agreement-tpc-group-llc-correct-alleged-clean-air-act-violations-its>) This agreement alleges the facility has multiple deficiencies, including visible external corrosion of equipment and failure to adequately track, manage, and mitigate dead legs. Dead legs occur in areas of a piping system that have no flow yet are still exposed to process, which can result in equipment failure if not managed properly. This scenario triggered an explosion at TPC's Port Neches facility in 2019 that injured workers and caused evacuations of nearby communities. Addressing these same issues at the Houston facility is paramount to protect workers and residents who live less than a mile away.
- **TRANSCAER Highway Transportation & Confined Space Entry Training**, April 4-6, 2023. Each day offers the same training each day to accommodate schedules. Become familiar with the cargo trailers on-site (DOT 406, MC-338, MC-331, and DOT 407) and experience a confined space drill. Designed for first responders visit <https://www.transcaer.com/training/training-events/tx/transcaer-highway-transportation-confined-space-entry-training/25011> or contact Jennifer Membreno at 1-571-766-3969, Mobile: 1-703-300-8921, or jmembreno@chemtrec.com

Local Updates

- **City of Houston Housing and Community Development** March 30, 2023, 3:00 pm via Virtual Microsoft Teams Link: bit.ly/2023SPH (English) and bit.ly/2023SPH-Spanish (Spanish), HTV, Facebook Live @HoustonHCDD, or Call US (Toll): 1-936-755-1521 and the English Participant Code: 103 305 474# and the Spanish Participant Code: 795 643 572#. This session will discuss the revised activities and budgets in the Draft Action Plan for Disaster Recovery: 2021 Winter Storm. This revised plan incorporates an additional \$19.7 million in disaster recovery funds that will help Houstonians recover from the 2021 Winter Storm (the Freeze) and enhance resiliency in future events.

Industry Updates

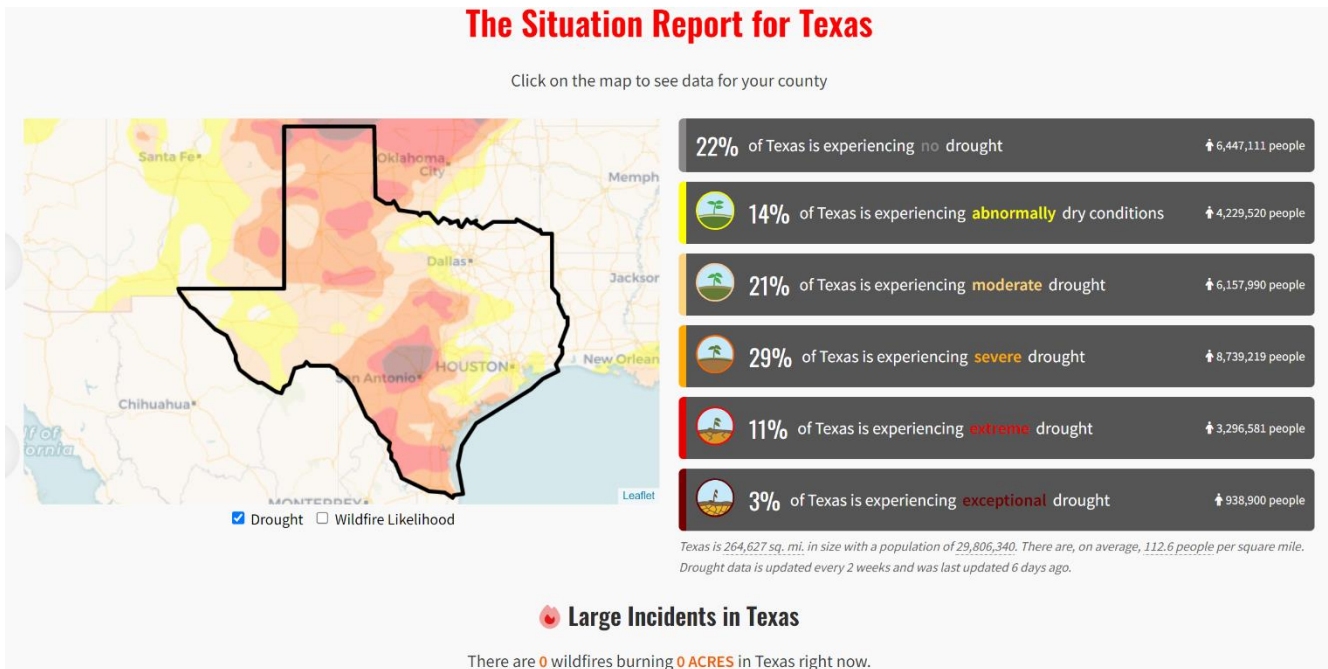
- **3E is offering a free one-hour webinar on "New PFAS Regulations Around the Globe: Action Items for Your Company"**, Thursday, April 13, 2023, 11:00 AM EDT. This webinar, regulatory experts will update you on the changing regulatory landscape of PFAS chemicals highlighting current and upcoming regulatory requirements and some action items for companies to stay compliant.

State Updates

- **TCEQ – LEPC Grant** – GHLEPC application not approved – grants went to first time grantees and small communities with less than 250 facilities.
- **TCEQ** is accepting applications under the Governmental Alternative Fuel Fleet (GAFF) Program. The GAFF Program will be providing an estimated \$3.9 million in grant funding to help government entities with 15 motor vehicles or more purchase or lease new vehicles that operate primarily on compressed natural gas, liquified natural gas, liquified petroleum gas (propane), hydrogen fuel cells, or electricity. Visit <https://www.tceq.texas.gov/airquality/terp/gaff> for details.
- **TCEQ** Household Hazardous Waste annual reports are due April 1, 2023, for any HHW collections that occurred during CY 2022. Send completed forms to Recycle@tceq.texas.gov.
- TCEQ's Environmental Trade Fair & Conference, May 16-17, 2023, at the Austin Convention Center as TCEQ celebrates 30 years of providing professional development and training. Visit <https://www.tceq.texas.gov/p2/events/etfc> for details.
- **TDEM** Seeks Nominations for First Responder Memorial at 2023 Texas Emergency Management Conference requesting nominations honoring first responders who have passed away in the last year to be displayed in a memorial at the 2023 Texas Emergency Management Conference in Fort Worth. The First Responder Memorial at The Conference honors the life and service of first responders across emergency management, fire and rescue, law enforcement, emergency

medical services (EMS), and public health, who have passed away. Visit <https://www.tdem.texas.gov/conference> for details.

- **Texas Department of Insurance:**
 - Free On-Site or Online Safety Consultations from the Texas OSHA Consultation Program (OSHCON) has safety and health resources to help your business. OSHCON consultations are both free and confidential. They are offered in person at your jobsite or virtually. They will help you find, reduce, and remove safety and health hazards, and understand OSHA standards, training, help with safety and health programs; and free safety training materials and publications. Visit <https://www.tdi.texas.gov/oshcon/>, call 1-800-252-7031, option 2, or email OSHCON@tdi.texas.gov.
 - Industrial robotics and workplace safety instructions recently updated and available at <https://www.tdi.texas.gov/tips/safety/robotics.html> .



Source: <https://www.fireweatheravalanche.org/wildfires/dashboard/texas>

TCEQ Rulemaking Activities as 03/27/2023

(available by visiting <https://www.tceq.texas.gov/rules/prop.html>)

1. **Proposed Rulemaking Chapter 338, Aboveground Storage Vessel Safety Program Rule Project No. 2022-015-338-CE.** This proposed rulemaking amends the Texas Water Code (TWC) by establishing a new Aboveground Storage Vessel Safety (ASVS) Program, to provide for the protection of groundwater and surface water resources in the event of an accident or natural disaster, identifying new safety elements that the TCEQ must include in the ASVS Program; and defining the universe of regulated entities.
 - the ASVS Program by September 1, 2023.
 - requires this program to include all critical safety elements applicable to a storage vessel and that TCEQ determines to be critical for the protection of ground water and surface water resources following federal statutes/regulations and national consensus standards.
 - require an owner/operator of a storage vessel must register, assess, and report to TCEQ on its compliance status with the ASVS Program no later than September 1, 2027,
 - any storage vessels constructed or brought into service after 9/1/2027 is required to register and certify compliance no later than 30 days following start of their operations. T

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- with all facilities required to certify compliance status no later than September 1, 2037.
 - There are an estimated 36,000 storage vessels subject to the ASVS Program.
 - TCEQ is required to conduct on-site inspections of the registered and certified facilities at least once every five years to determine compliance.
 - The ASVS Program is applicable to aboveground storage vessels located at petrochemical plants, petroleum refineries, or bulk storage terminals that are constructed with non-earthen materials, have a storage capacity of 21,000 gallons (500 barrels) or more, and store a regulated substance as defined by TWC, §26.343.
 - *Anticipated adoption date: August 9, 2023*
- 2. Chapter 116, Control of Air Pollution by Permits for New Construction or Modification Concrete Batch Plant Standard Permit Distance Limitations and Public Notice Rule Project No. 2022-034-116-AI.** TCEQ seeks to amend Chapter 116, Control of Air Pollution by Permits for New Construction or Modification, to ensure that owners or operators of concrete batch plants authorized under TCEQ's Air Quality Standard Permit for Concrete Batch Plants comply with certain public notice and hearing requirements **if they propose to move** the registered concrete batch plant **to a new location on the site**. The owner or operator shall submit a new or amended registration and fee and comply with the public notice requirements, including the opportunity to request a contested case hearing, unless the new location is greater than 440 yards from any property line.
- Anticipated adoption date: August 16, 2023
- 3. Chapter 330, Municipal Solid Waste Regional Solid Waste Management Plans Approval Rule Project No. 2022-035-330-WS.** This rulemaking would revise 30 TAC §330.647 to adopt the 24 approved regional solid waste management plans developed by the COGs for the period 2022-2042.
- There are 24 regional planning commissions (councils of governments (COGs)) in Texas with responsibility under Texas Health and Safety Code (THSC), §363.0615 for regional solid waste management planning. All 24 COGs submitted regional solid waste management plans, approved by their Boards of Directors, to the Texas Commission on Environmental Quality (TCEQ or commission). [HGAC – COG]
 - Anticipated adoption date: July 19, 2023
- 4. Commission Approval for Proposed Rulemaking Chapter 5, Advisory Committee and Groups Establishing dates of abolishment in rule for advisory committees Rule Project No. 2023-006-005-LS.** The proposal would amend 30 TAC §5.3, Creation and Duration of Advisory Committees Created by the Commission, to provide that advisory committees created by the commission are to be abolished according to the requirements of TGC, §2110.008 unless the advisory committee is required to remain in effect without abolishment under a state or federal law or a different date for abolishment is established under new §5.15. The proposal would create new §5.15, Duration of Advisory Committees, to establish the duration of advisory committees. New subsection (b) establishes an abolishment date of December 31, 2032, for the following advisory committees: the Water Utility Operator Licensing Advisory Committee, the Municipal Solid Waste Management and Resource Recovery Advisory Council, the Irrigator Advisory Council, the Concho River Watermaster Advisory Committee, the Rio Grande Watermaster Advisory Committee, the South Texas Watermaster Advisory Committee, and the Brazos Watermaster Advisory Committee.
- Anticipated adoption date: June 14, 2023
- 5. Commission Approval for Proposed Rulemaking Chapter 285, On-Site Sewage Facilities (OSSF) OSSF Updates, Rule Project No. 2021-030-285-CE.** On November 12, 2020, the Texas On-Site Wastewater Association (TOWA) filed a petition for rulemaking. On April 5, 2021, B&J Wakefield Services, Inc. (Wakefield) filed a petition for rulemaking. On December 16, 2020, and May 19, 2021, respectively, the commission directed the executive director to
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initiate rulemaking after stakeholder involvement concerning the issues raised in the petition. The petitions requested amendments to several sections and the executive director considered the changes recommended by TOWA and Wakefield.

TCEQ Pending Enforcement Action – TCEQ Cases

Details are available by filing an open records request at

<https://www2.tceq.texas.gov/oce/penenfac/>

Training Opportunities

1. Visit www.ghlepc.org/training for listing of training.
2. **TCEQ**, the State of Texas Environmental Electronic Reporting System (**STEERS**), Tier II Reporting (TIERII) visit <https://www3.tceq.texas.gov/steers/>
3. **ONLINE & IN-PERSON HazMat Training. TRANSCAER®** (Transportation Community Awareness and Emergency Response). <https://www.transcaer.com/training>.
4. **Texas School Safety Center (TxSSC)**. Visit <https://txssc.txstate.edu/tools/pipeline-safety/> for details.
5. **FEMA Virtual Instructor Led Courses**
Register on the OBP/CDP Schedule & Registration Page at: <https://cdp.dhs.gov/obp> to receive updates. Note: FEMA Student Identification (SID) number and password are required to apply. To obtain a FEMA SID, go to: <https://cdp.dhs.gov/femasid/register>.
6. Other Training Opportunities:
 - a. <https://preparingtexas.org>
 - b. www.fema.gov
 - c. www.harriscountycitizencorps.com
 - d. <https://houstonuasi.com/regional-training-registration-2021/>
 - e. **Texas Department of Insurance**

GHLEPC HazMat Incident Functional Exercise After Action Report Summary

Exercise Team

HFD Hazmat Captain Dana Brown, Lindsay Sander (Buxus), and GHLEPC

A special thank you to the American Red Cross, Buxus, Houston Fire Department HazMat, Kinder-Morgan, National Weather Service, and GHLEPC Leadership

This project was made available by the GHLEPC

EXECUTIVE SUMMARY

Operation HazMat was a functional exercise which focused on response to a Hazardous Materials incident in SE Houston, TX. Our purpose was to help the Houston area to:

- 1) Enhance response capabilities through development of partnerships, coordination capabilities and effective communication processes between all local response entities,
- 2) Assess and validate county and local plans as well as established mutual aid agreements and,
- 3) Evaluate participating agencies and organizations' performance in accomplishing pre-established exercise objectives.

The exercise focused on the first few critical hours of the activation of the jurisdiction's on-scene Incident Command System (ICS) and the responding entities' coordination with each other and the various agencies. This After-Action Report (AAR) is intended to assist local agencies in strengthening emergency preparedness plans by identifying and evaluating strengths and areas of concern observed during the exercise and by making recommendations for corrective actions as appropriate.

Although issues were recognized and discussed during the exercise, the HazMat Functional Exercise was designed to:

- ◆ Exercise the joint response capabilities between on-scene responders, and local government, industry, and non-government partner(s) in key response categories of:
 - Command, Control & Communications
 - Protective Actions and Public Information
- ◆ Identify strengths and areas needing improvement.

KEY ACHIEVEMENTS

- ◆ Good understanding of ICS and HazMat response by local fire departments.
- ◆ Good understanding of limitations and complications of PPE by fire departments in responding to a train derailment/semi-trailer truck accident involving both HazMat and potentially fire.
- ◆ Good cooperation and collaboration between HazMat Unit, NWS, utility, and railroad partners.
- ◆ Early discussion of public information campaign with coordination among partners.
- ◆ Great enthusiasm among cooperating agencies such as Hospital and community services to assist. (No turf issues)

KEY CONCERNS

- ◆ Use of Incident Command System (ICS) and National Incident Management System (NIMS) concepts, guidelines, and tools at the community level was substandard.
 - ◆ Lack of community-wide familiarity with local EOP and HazMat plan.
 - ◆ Lack of understanding on how to implement or manage an effective Public Information Campaign or how to activate the Emergency Alert System (EAS) within the community.
- Additional training in ICS tools and concepts and aggressive education at the community level and public officials on local plans and procedures needs to occur within the jurisdiction(s). Based

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on Operation HazMat, a local response by first responders (fire/hazmat, law enforcement, and railroad) to a real-world incident such as presented in the exercise using current in-place procedures and systems, would be adequate. Second-tier responders and support agencies may be delayed due to the above-mentioned concerns. In order to mount an adequate, efficient response, there should be further reviewing and upgrading of plans and procedures, additional training of personnel, and more exercises and evaluation of capabilities.

EXERCISE OVERVIEW

Jurisdiction:	Greater Houston Area (Harris County)
Exercise Location:	American Red Cross, Houston
Exercise Name:	Operation HazMat
Exercise Date/Time:	November 30, 2022, 8:30 am – 1:00 pm
Sponsor:	GHLEPC
Type of Exercise:	Functional Exercise (Limited)
Exercise Focus:	Response
Classification:	For Official Use Only (FOUO)
Hazard Scenario:	Hazardous Materials Release – BHO Extraction followed by a Train Derailment involving a Semi-Trailer Truck
Actual Occurrence:	No
Number of Participants:	Facilitator/Evaluator-3; Players-47; Observers-2

EXERCISE GOALS & OBJECTIVES

Operation HazMat was a functional exercise simulating a HazMat release due to a transportation accident (train derailment with semi-trailer truck at a major intersection). The exercise purpose was three-pronged and intended to:

- 1) Enhance local response capabilities through development of partnerships, coordination capabilities and effective communication processes between local response entities, and
- 2) Assess and validate city and county agency plans and established mutual aid agreements with industry in response to a HazMat incident and,
- 3) Evaluate participating agencies' performance in accomplishing pre-established exercise objectives which included demonstrating the ability to:
 - a. Direct coordinate, and control emergency activities using ICS.
 - b. Alert and activate personnel for emergency response and maintain operations until the situation is brought under control.
 - c. Mobilize, track, and demobilize equipment, people, and other resources in support of emergency operations.
 - d. Develop and maintain a coordinated action plan to accomplish operational objectives.
 - e. Identify and implement appropriate actions to protect emergency workers and the public.
 - f. Coordinate and disseminate timely and accurate information to the media and the public.

SCENARIO

An emergency response drill/functional exercise involving a train derailment that impacts several pipelines, commercial rail, and the transportation of hazardous materials in an urban area. This is in addition to an explosion affecting commercial and residential facilities. The impact affects mass transit, large outdoor crowds, schools, multiple facilities, and residential properties including retirement homes, apartments, and sporting venues.

EVALUATION PROCESS

The evaluation methodology came primarily from the current HSEEP Exercise Evaluation Guides (EEG)s and other Department of Homeland Security guidance to include the Target Capabilities List and the Universal Task List. This AAR has been prepared based on the evaluator's observations and comments from the participants.

CONCLUSION

Additional training in ICS tools and concepts and education of local community partners who may serve as responders and/or communicators on local hazmat plans and procedures needs to occur within the jurisdiction. This training should cover emergency communications particularly with special needs populations, coordination and control, emergency public information, resource management, and health/medical response. For an effective response, there should be further reviewing of plans and procedures, additional training of personnel, and more exercises and evaluation of capabilities.

Based on the results of the exercise and this AAR, local emergency response agencies, and regional partners, should consider forming working groups to tackle what has been captured in this report.

This After-Action Report is a snapshot of the jurisdiction based on evaluations, verbal comments, and observation and is not specific to any single agency. The contents of this After-Action Report are For Official Use Only.