



# CHEMICAL EMERGENCY PREVENTION & PLANNING

Newsletter

January - February 2012

US EPA Region 10

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### CHEMICAL EMERGENCY PREVENTION & PLANNING Newsletter

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## Best Practices from the Field

*During RMP training and inspections we meet talented people with innovative ideas. This issue, Dan Casmey, Executive VP of Safety, Security and Regulatory compliance, Jones Chemicals Inc., describes their system of safety training. Each month facilities receive information for safety meetings that, over a three year period, cover all the safety training requirements.*

### Safety Training – A Comprehensive Approach

**Dan Casmey, Jones Chemicals, Inc.**

#### Training program runs in a three-year cycle

Jones Chemicals Inc., headquartered in Sarasota, Florida, is a fourth generation family owned company with eleven chlorine repackaging and distribution facilities located throughout the U.S. Their comprehensive safety training program is based on a three year cycle encompassing not only the operating procedures applicable to the processes and systems in place at each of the eleven facilities but training for emergency responders, hazmat employee training, security training, hazard communication training for all employees and hazardous waste operations training.

The company's safety program consists of safety policies and procedures covering every single operation, function or task performed, various safety training and instructional programs that have been established for all employees, monthly safety training meetings, shift meetings, safety awareness displays and bulletin board postings, safety department communications to include Safety Alerts, safety training videos, documented employee training records, incident investigations, emergency response drills, and other resources.

*Includes initial and refresher training*

#### Three Year Training Cycle

Safety training is conducted at a minimum, monthly in accordance with training requirements established by the Corporate Safety Department. Training is identical at all Branches as the operations are, with very few exceptions, very similar at all eleven facilities. The emphasis is on the quality of the training being conducted, not the quantity of the training conducted. We've found that given the extensive training requirements, the training cycle is much more effective if spread out over the course of a three year period to ensure it doesn't become simply a matter of focusing primarily on getting training done and checked off to complete all training requirements within a year's time.

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**REPORT**

**CHEMICAL or OIL SPILLS**  
to the NATIONAL RESPONSE CENTER

**1-800-424-8802**

## Best Practices from the Field *(continued)*

This approach was initiated two years ago and has proven to be extremely effective.

*All JONES CHEMICALS INC. employees, including office and sales personnel, drivers, and plant employees, participate in this training which is broken down into the three following phases:*

**New employee indoctrination** – Training for new employees is a combination of classroom and activity specific on-the-job training (OJT) before they begin working. Training is considered to be completed when the new employee demonstrates an acceptable level of understanding to the Branch Manager, Plant Manager, and/or Foreman. All new employees receive training on the following, again, before being permitted to begin working:

- Corporate Safety Policy
- General safety rules
- Plant safety rules
- Personal protective equipment
- Eye, face, and head protection policy
- Operation of the eyewash/safety shower
- Respiratory protection policy
- Safety shoe policy
- Visitor policy and safety rules
- JONES CHEMICALS INC.'s Hazard Communication Training program
- Contingency Plan, Fire Prevention, and Evacuation Plan
- Accident prevention and reporting programs
- Hazardous Materials specific training
- Security awareness training

**Job instruction and training** – Job Instruction Training is the process followed in providing on-the-job training pertaining to specific tasks for new employees, transferred employees, and experienced employees alike as it accomplishes the following:

- Provides the most effective means for helping new employees learn to perform their jobs both safely and efficiently
- Ensures that consistency in operations is maintained
- Shortens the learning curve
- Serves to provide hands on training so as to minimize the likelihood of injuries, accidents, spills, leaks, and or releases.

During job instruction, both the job and the associated performance standards that must be met are explained in detail to the employee being trained. Next, the trainer performs the job functions along with the employee being trained. This enables the trainee to see the work being performed exactly as they will do it on the job. The last step is to allow the trainee to perform the job in a trial performance. At this point in the instruction cycle, the trainer becomes a coach and watches the trainee perform. This is continued until the trainee has mastered the job. There is nothing cast in concrete dictating how much time is to be spent training an employee, whether new or experienced, on a job. Understanding that different employees learn at different rates, it is ultimately the responsibility of management to ensure that an employee is thoroughly and properly trained before releasing him or her to work alone.

*Document On-the-Job Training, supervisor signs off*

**Periodic training** – In addition to safety training received as a new hire, all employees are required to participate in periodic, or refresher, safety training relative to their job position. The purpose of periodic safety training is to reinforce safety training previously provided in the event an employee returns to a job he or she previously learned and performed, an employee requires additional training to improve performance, and to update employees on any changes in processes, procedures, systems, regulations, and etc. Periodic safety training also includes refresher training conducted annually simply to reinforce the proper method to perform a specific job.

*Methods to evaluate training effectiveness*

The level of understanding of all of the training provided is evaluated via discussion, a demonstration of the job requirements, and/or a written test.

The approach we've taken to safety and safety training is that all employees at all levels within the company from senior management on down must accept personal responsibility for safety, not only of themselves but of their fellow employees as well. It is unreasonable to think that responsibility for safety lies solely with Executive Management, the Safety Department, and or the Branch Managers at each of our eleven facilities. While we expect our Managers to set the example and ensure that safety awareness is at a high level at all times, it is our belief that the active and aggressive participation and commitment of all employees is vital to the effectiveness of our safety and safety training programs. It is an integral

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## Best Practices from the Field *(continued)*

part of what we do and while safety training is conducted once or twice a month, working safely and in accordance with the policies and procedures developed solely to provide for our employee's safety is expected and emphasized constantly each and every day. We've found that by involving our employees in the development and administration of our safety program, they accept both ownership and responsibility for its effectiveness and this attitude and approach resonates throughout the company.

Safety is everyone's responsibility

### Sources for Training Requirements:

40 CFR 68.54 (Program 2)

40 CFR 68.71 (Program 3)

### General RMP Guidance:

Chapter 6 (Program 2): <http://www.epa.gov/emergencies/docs/chem/Chap-06-final.pdf>

Chapter 7 (Program 3): <http://www.epa.gov/emergencies/docs/chem/Chap-07-final.pdf>

### Sample: Monthly Training Schedule (Jones Chemicals, Inc., edited for space)

The following is the Safety Training to be conducted during January of 2011 along with the manual to be referenced, if applicable, in conducting this training:

<b>Contingency Plan</b>	<b>Who (All)</b>	<b>Resource (Contingency Plan Manual)</b>
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Ensure that your Branch Contingency Plan is up to date and that you cover the Branch's responsibilities as a whole as well as each employee's specific responsibilities as discussed in the Branch specific Contingency Plan...All employees are to take the written quiz found on page ... and this training is to be recorded on both Record of General Training and Emergency Responder Safety Training of the training record.

<b>Container Requalification</b>	<b>Plant</b>	<b>(Production Manual)</b>
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During this safety training, ensure that all employees understand the testing requirements with respect to when a container must be pulled from service and retested.... This training is to be recorded on page - of the training record.

<b>Bomb Threat Procedures</b>	<b>All</b>	<b>(Security Manual)</b>
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As a reminder, there should be a copy of the Bomb Threat Check List posted by each phone at .... This training is to be recorded ...

<b>Slips, Trips, and Falls</b>	<b>All</b>	<b>(No manual referenced)</b>
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Given the fact that we are now in our winter season, this is an appropriate time to discuss slips, trips, and falls caused by weather conditions. ..

Should you have any questions regarding the above, just let me know and again, ensure that this training is documented both on the Record of Monthly Safety Meeting form and the appropriate page as indicated above in each employee's Record of Safety Training.

## EPA Reinstates Toxics Release Inventory Reporting Requirements for Hydrogen Sulfide:

The U.S. Environmental Protection Agency (EPA) is announcing that it is reinstating Toxic Release Inventory (TRI) reporting requirements for hydrogen sulfide. This action will be effective for the 2012 TRI reporting year. The first reports for the 2012 TRI reporting year are due from facilities by July 1, 2013.

This action is part of Administrator Lisa P. Jackson's ongoing efforts to provide Americans with helpful information on chemicals they may encounter in their daily lives. TRI is a publicly available database that contains information on toxic chemical releases and waste management activities reported annually by certain industries and federal facilities. The purpose of today's action is to better inform the public about toxic chemical releases in their communities and to provide the government with information for research and the potential development of regulations.

More information on TRI: <http://www.epa.gov/tri>



### Plan to attend the FREE EPA Risk Management Training Day

in your area

### RISK MANAGEMENT PROGRAM (RMP) Training

Quincy, Washington - Spring, 2012

Portland, Oregon - Fall, 2012

Watch for details on:

[EPA Region 10's RMP website](http://www.epa.gov/rmp)

#### Where Do I Go For More Information?

<http://www.epa.gov/emergencies/rmp> will be updated as new information becomes available.

EPA maintains numerous listservs to keep the public, state and local officials, and industry up to date, including several that pertain to emergency management. You can sign up for our list serve to receive periodic updates:

[https://lists.epa.gov/read/all\\_forums/subscribe?name=callcenter\\_oswer](https://lists.epa.gov/read/all_forums/subscribe?name=callcenter_oswer)

EPA Region 10 RMP Coordinator:  
Javier Morales 206-553-1255

EPA Region 10 RMP Website:  
<http://yosemite.epa.gov/R10/CLEANUP.NSF/sites/rmp>

#### Superfund, TRI, EPCRA, RMP & Oil Information Center

The Information Center can also answer questions related to Clean Air Act section 112(r) and RMP reporting requirements. (800) 424-9346 or TDD (800) 553-7672 (703) 412-9810 or TDD (703) 412-3323 in the Washington, D.C. area

Normal Hours of Operation:

Monday - Thursday 10:00 a.m. - 3:00 p.m. Eastern Time

Extended Hours of Operation (May, June, and July):  
Monday - Friday 9:00 a.m. - 5:00 p.m. Eastern Time  
Closed Federal Holidays

<http://www.epa.gov/superfund/contacts/infocenter/>

#### Risk Management Program (RMP) Reporting Center

The Reporting Center can answer questions about software or installation problems. The RMP Reporting Center is available from 8:00 a.m. to 4:30 p.m., Monday through Friday, for questions on the Risk Management Plan program. (703) 227-7650 (phone)

[RMPRC@epa.cdx.net](mailto:RMPRC@epa.cdx.net) (e-mail)

This newsletter provides information on the EPA Risk Management Program, EPCRA, SPCC/FRP and other issues relating to Accidental Release Prevention Requirements. The articles contained herein are provided for general purposes only. EPA does not accept responsibility for any errors or omissions or results of any actions based upon this information. Please consult the applicable regulations when determining compliance.

Mention of trade names, products, or services does not convey, and should not be interpreted as conveying official EPA approval, endorsement, or recommendation. The information should be used as a reference tool, not as a definitive source of compliance information. Compliance regulations are published in 40 CFR Part 68 for CAA section 112(r) Risk Management Program, 40 CFR Part 355/370 for EPCRA, and 40 CFR Part 112.2 for SPCC/FRP.