



Adam Lid <adam.lid@lacity.org>

Special meeting June 13th - public safety committee

1 message

Lacombe <chateau4us@att.net>

Thu, Jun 12, 2014 at 11:24 AM

To: adam.lid@lacity.org

Regarding Item # 13-0462

Motion (Buscaino - Englander) relative to establishing a California Accidental Release Prevention (CalARP) inspection section on the Los Angeles Fire Department (LAFD) web site that would provide information in regard to: 1) code requirements as mandated by City, State, and Federal Government; 2) inspection status/frequency of inspections performed; 3) inspection history; 4) emergency procedures designed to keep the public safe from or in the event of an accidental release; and 5) whether the facility has a Risk Management Plan on file that has been approved by the proper agencies.

Dear Councilmembers,

I would like to encourage you to amend this motion to include that any company that has a risk management plan filed with the EPA that has a blast radius that extends beyond the property owned by the business that company must provide independent insurance for everyone and everything (including City and County property) that may be impacted by a blast. A company with a blast radius should provide insurance and be responsible for any losses due to an accident or terrorist attack. Private homeowners insurance will not cover these losses. The insurance coverage information should be made public to those in the blast radius so they will have the opportunity to file a claim promptly and to be made aware of any policy limits or exclusions.

Regarding Item #1 – I would like to encourage you to add a municipal code to this item that states if a company that is within the Fire Department's jurisdiction, and violates any code requirements from a City or State or Federal Government they must shut the operation down until the code violation is cleared. Currently Rancho Holdings LLC in San Pedro has 6 violations filed against them by the EPA from over a year ago and there has been no resolution because the EPA does not impose any deadlines. Also, if a company does not report a leak or release of LPG as required, the City of Los Angeles should issue its own severe fines to encourage proper reporting. This will encourage companies to resolve violations quickly and it will ensure public safety.

Regarding Item #4 – Here are some questions that need to be answered and incorporated into the emergency procedures to ensure public safety.


1. Does the company have insurance to cover all claims for damages and/or injury for a homeowner within the blast radius?
2. If the company has insurance to cover all claims for damages and/or injury for a homeowner within the blast radius, what is the maximum coverage per claimant? Per incident?
3. If a homeowner within the blast radius suffers damage to person or property as a result of an accident or terrorist attack at the company, what corporate entity should the homeowner seek to redress his/her financial losses?

4. In the event of an explosion, if the company is an LLC, what guarantee does the public have that the company will not file bankruptcy and not make good on its insurance coverage?
5. If the company has insurance to cover the residents within the blast radius, will the company agree to present the details of that coverage to a representative of the residents who has insurance industry knowledge to interpret the details of the coverage?
6. If the company has insurance to cover the residents within the blast radius, how do the affected residents know that the coverage will exist at the time of an explosion? For example, the coverage exists today but is gone tomorrow.
7. How many gallons of LPG must leak before employees call 911 and evacuate the facility?
8. Is there an employee evacuation plan? If so, may representatives of the community see it?
9. If there is an incident that causes the employees of the facility to evacuate, what is the managements instructions to their employees as to how far from the facility they should go to remove themselves of danger?
10. If the company provides no instructions to its employees as to how far to evacuate in the event of a LPG release, would management find it reasonable for their employees to remain at the facility under those circumstances?
11. If there is an incident that causes the employees of the facility to evacuate, how will the homeowners, employees and shoppers nearby be made aware of the event?
12. If there are no sirens or warning alarms for the public, is it reasonable that the employees of the company have much more time to evacuate than the local citizens?
13. What will the Fire Departments response to a 10,000 gallon release of butane or propane?

Regarding Item #5, I have attached a letter from the EPA that clearly states the EPA does not verify if any of the information provided to the EPA is valid. Even though a company has filed a Risk Management plan, it has NOT been “approved”. They only state the Risk Management plan is complete – not valid or accurate. This has been a concern of the community for decades. This also provides an opportunity for a company to minimize their potential impact on the surrounding community. The City of Los Angeles should ensure that the information provided in the Risk Management plan is actually valid, verified and accurate. The information should also be consistent from one company to the next. For example the attached flyer that was given to the public and does not match the information that is on the Risk Management plan for Rancho Holdings LLC that stores 25 million gallons of butane and 10 million gallons of propane. The public deserves consistent and accurate information.

Thank you,
Jeanne Lacombe
(310) 833-0444

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594K

 **Tosco_refinery_public_notification_handout.pdf**
2547K

Facility Name: San Pedro Terminal
EPA ID: 1000 0017 0389

RMP- 8/3/08



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
SOLID WASTE AND EMERGENCY
RESPONSE

Daniel Johansen
Rancho LPG Holdings LLC
2110 North Gaffey Street
San Pedro, CA 90731

February 06, 2009

EPA Facility ID#: 1000 0017 0389
Postmark Date: 01/26/2009
Anniversary Date: 04/19/2010

NOTIFICATION LETTER: COMPLETE RMP

The U.S. Environmental Protection Agency (EPA) received your Risk Management Plan (RMP) dated with the above postmark date. **This letter notifies you that your RMP is "complete" according to EPA's completion check.** The completion check is a program implemented by EPA to determine whether a submitted RMP includes the minimum amount of information every RMP must provide. The completion check does not assess whether a submitted RMP should have provided additional information or whether the information it provides is accurate or appropriate. In other words, it does not indicate that the RMP meets the requirements of 40 CFR Part 68.

Please note the anniversary date indicated above. Your RMP must be revised and updated by this date or earlier as required by 40 CFR §68.190. Please also note your EPA Facility ID number as identified at the top of this letter; all future Risk Management Plan submissions, corrections and other correspondence must include this number.

Facility Name: San Pedro Terminal
EPA ID: 1000 0017 0389

If you have any questions, please call one of the following numbers:

(1) For RMP rule interpretation questions, call the EPCRA Hotline at (800) 424-9346 or (703) 412-9810 (in the D.C. Metro area).

(2) For RMP*Submit installation and software questions, or information on the status of your RMP, contact the RMP Reporting Center at (301) 429-5018, or write to the:

RMP Reporting Center
P.O. Box 1515
Lanham-Seabrook, MD 20703-1515

(3) For more information on the Risk Management Program, you can contact your Implementing Agency. Your Implementing Agency is

California Office of Emergency Services, P.O. Box 419047, Rancho Cordova, CA, 95741-9047, Phone: 916-464-3281.

Thank you for your cooperation in this matter.

Sincerely,

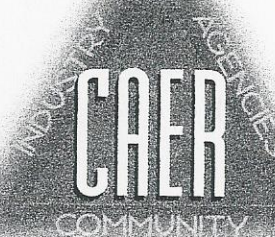
RMP Reporting Center

Enclosure:

Risk Management Plan (if submitted on paper)

LIVING SAFELY WITH CHEMICALS

UNDERSTANDING CHEMICAL RISK MANAGEMENT



Butane

Tosco Refining Company

Tosco Los Angeles Refinery

1660 W. Anaheim Street
Wilmington, CA 90744



WHAT IS RMP?

The main focus of the Federal Environmental Protection Agency (EPA) **Risk Management Plan (RMP)** Rule is the prevention of chemical releases that could affect the surrounding community or environment. The RMP Rule is also intended to assist in improving plant safety and protecting the public by collecting information to encourage community discussions in three main areas:

- **Hazard Assessment**
- **Prevention Program**
- **Emergency Response Program**

BASIC INFORMATION

At Tosco's Los Angeles Refinery, the petroleum gases in use are butane, methane, ethane, propane and pentane. Petroleum gases are invisible and have a very slight sweet, oil-like odor. They are very flammable. Petroleum gases are naturally occurring. They are produced from decaying plant material in swamps and can be found from underground sources. Some of the common uses of liquefied petroleum gases include:

- Sources of heat
- Cooking, barbeques
- Heating homes, farms and businesses
- "Clean-burning" fuel for cars
- Cigarette lighters

Small concentrations of liquefied petroleum gases can be mildly irritating to the nose, eyes, and throat and may cause headaches. High concentrations could cause more serious problems, such as convulsive coughing, difficult and painful breathing, nausea and vomiting, and require medical attention. Frostbite will occur only if there is direct contact with liquefied gas.

FOR MORE INFORMATION:

This brochure is only a summary of what has been provided to the Federal and State agencies. If you would like more information, please contact Tosco Los Angeles Refinery Public Affairs at (310) 952-6035 or (310)952-6038.

FIVE-YEAR ACCIDENT HISTORY

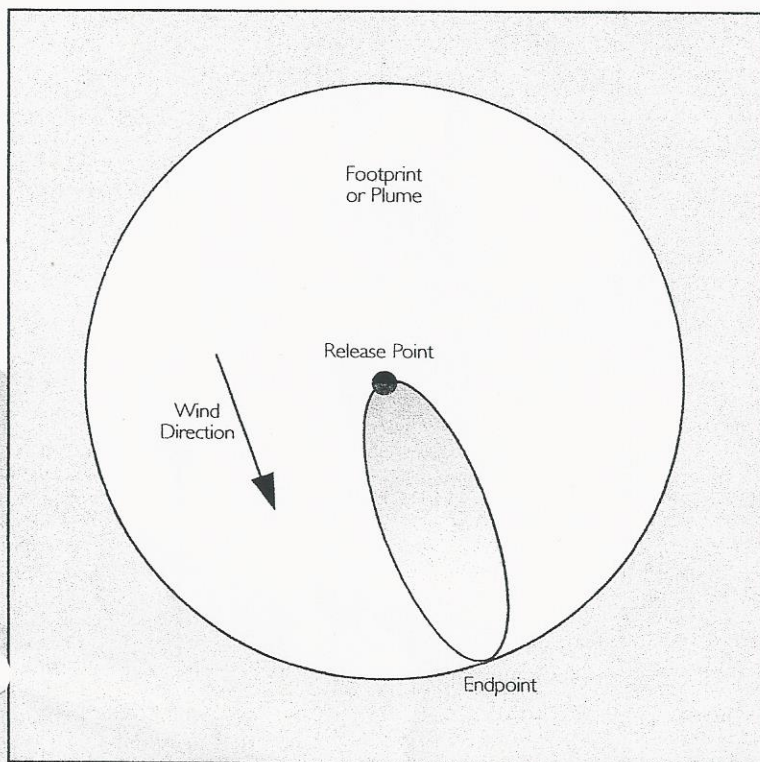
The Federal Environmental Protection Agency (EPA) requires companies to report releases that have resulted in an injury, illness or a significant impact on the community or the environment. In the past five years at Tosco's Los Angeles Refinery, we have had no releases of butane that were significant enough to be reported under the Risk Management Plan (RMP).

ACCIDENTAL RELEASE SCENARIOS

The Risk Management Plan requires companies to identify "worst case" and "alternate release" scenarios as defined by EPA. In determining the worst case scenario, no safety measures (such as automatic shutdown systems) or emergency response actions can be considered. For the alternate release scenario, existing safety systems and typical emergency response actions can be considered. For *toxics*, both the worst case scenario and the alternate release scenario would create a vapor cloud near the ground that travels away from the facility in the direction of the wind. As the cloud travels away from the facility it will spread out, becoming less concentrated and less harmful. For *flammables*, the release could affect the "full circle", but will be over very quickly. **It is important to remember that these scenarios are not predictors of events but rather are intended to be used as emergency response planning tools.**

HOW TO READ A SCENARIO MAP

The maps on the next page show the worst case and alternate release scenarios for butane at Tosco's Los Angeles Refinery.



Scenario Circle

A circle extending from the release point to the endpoint distance. Used by local officials for emergency planning.

Endpoint

For *toxics*, the endpoint is the distance at which a person can be exposed for up to an hour without serious health effects. For *flammables*, the endpoint is the distance at which a fire or explosion should no longer damage buildings or hurt people.

Footprint or Plume

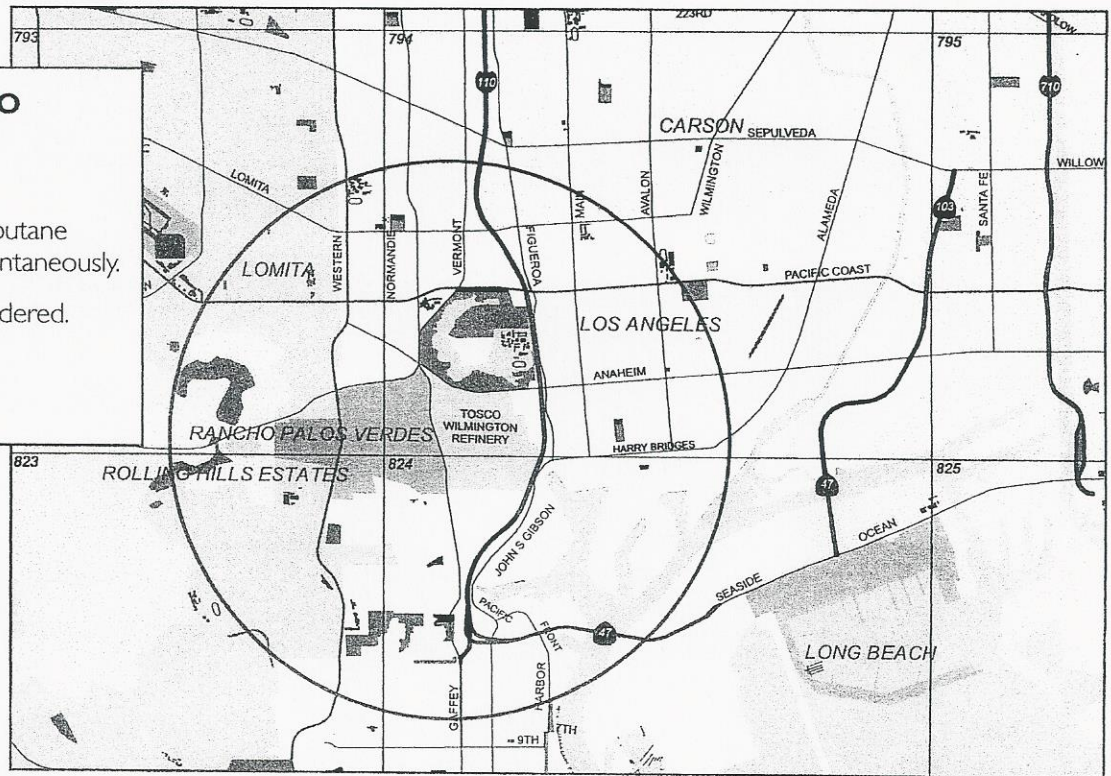
Assumptions are used to establish an area that could be affected by an accidental release. Toxic releases generally go in the direction of the wind and may travel many miles over several hours. The greater the distance from the release, the more time there is to take protective action. The effects of flammable releases are limited to areas much closer to the release point and could affect the "full circle", but are over very quickly.

WORST CASE SCENARIO

WORST CASE SCENARIO ASSUMPTIONS FOR BUTANE:

- Everything in a refrigerated butane storage tank is released instantaneously.
- Safety controls are not considered.
- Butane completely vaporizes and explodes.

DISTANCE OF POTENTIAL IMPACT:
2.3 MILES



PUTTING IT INTO PERSPECTIVE

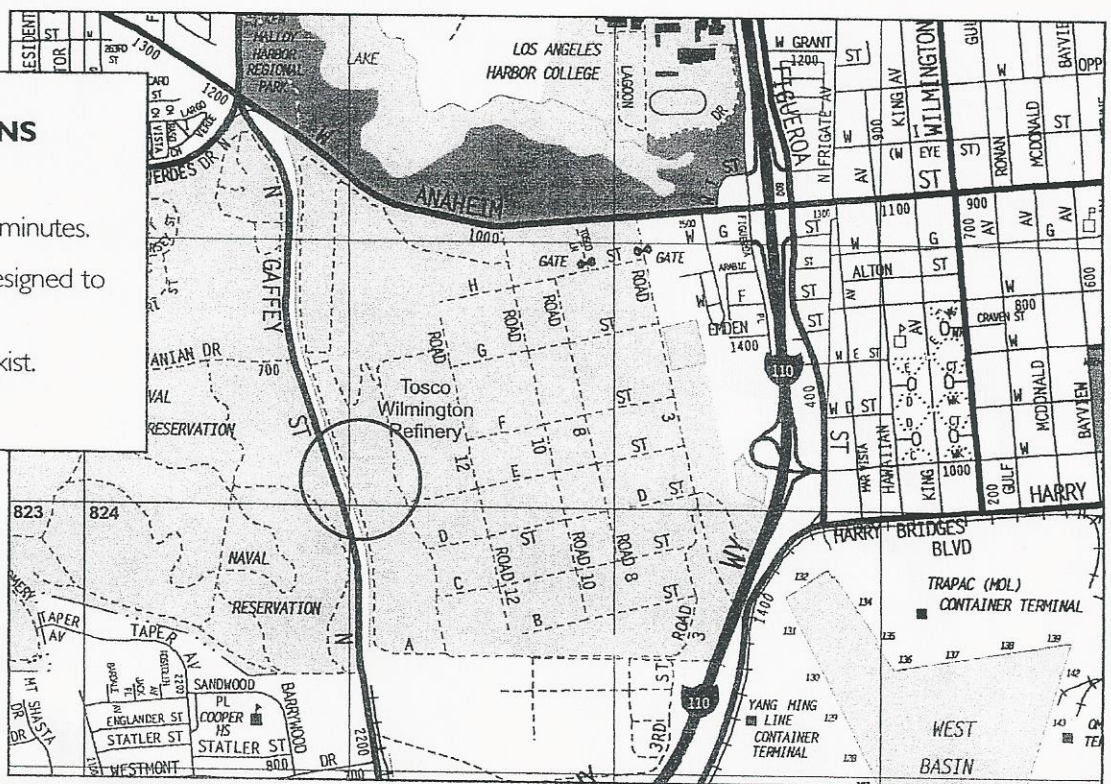
Worst Case Scenario Amount Released 5,092,000 Gallons
 Alternate Release Scenario Amount Released 6,160 Gallons

ALTERNATE RELEASE SCENARIO

ALTERNATE RELEASE SCENARIO ASSUMPTIONS FOR BUTANE:

- Release of 30,000 lbs. in 15 minutes.
- Safety controls operate as designed to minimize release.
- Typical weather conditions exist.

DISTANCE OF POTENTIAL IMPACT:
0.11 MILES



WHAT WE DO TO PREVENT ACCIDENTAL RELEASES

At Tosco's Los Angeles Refinery, safety is our number one priority and we take it seriously. We use a variety of safety equipment and follow strict procedures to prevent releases and to reduce the impact of releases. Some examples are:

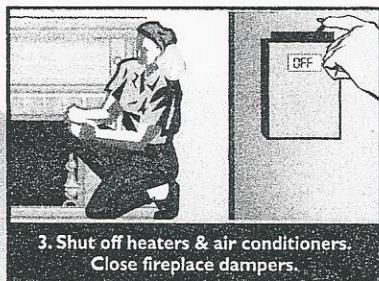
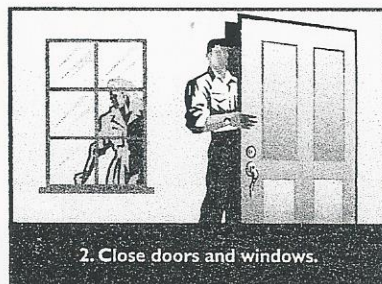
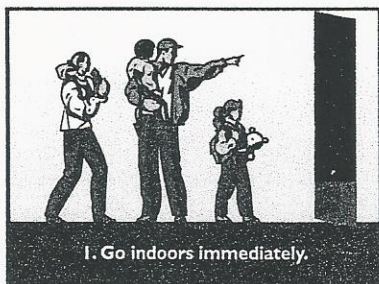
- Safety controls, such as leak detectors, warning alarms and automatic shutdowns
- Regular equipment inspections and maintenance to ensure proper operation
- Investigation of all incidents to improve our procedures and prevent reoccurrence
- Routine audits of processes both by Tosco's Los Angeles Refinery and outside agencies

WHAT TO DO IN A CHEMICAL EMERGENCY

Although the chance of a significant chemical accident is small, the possible health effects could be serious. Therefore, it is important for you to know what to do. These accidental releases can occur quickly. For the first few minutes of any emergency, you will be on your own and you will need to rely on your senses.

If you are outdoors and you smell a strong chemical odor, protect yourself by immediately going inside the nearest building, home or vehicle.

This is called **Shelter in Place** and is the best way to protect yourself and your family in the event of an accidental chemical release. This works because the outside air does not mix quickly with the air in these spaces when they are closed or sealed. Shelter in Place protects you from the most toxic vapors as the cloud passes.



PREPARING FOR EMERGENCIES

Tosco's Los Angeles Refinery and other nearby facilities have formed a relationship with the local authorities in order to ensure your safety during a chemical emergency. Emergency plans are reviewed by local emergency responders, such as city and county fire departments. Tosco's Los Angeles Refinery conducts emergency response drills to prepare for accidents such as those described in this brochure.

For more information, please contact Jeff Callender at (310)952-6035 or Agnes Sibal at (310)952-6038 or Los Angeles City Fire Department at (213) 485-8080.