Description:		LEPC Member Review Process			Author:	Michele Martinez
Process Owner:		Agency Level			Rev. Date:	5/25/2021
Tools & supplies:		hhft.azserc email, 1HHFT Log, LEPC/EM/FD Contact List			Expiration Date:	11/25/2021
Safety:		No safety implications at this time	5S:			
PROCESS	AD via		Staff prepare explaining th disclaimer: 0 person(s) no attachments information entity desig disseminati	es email for the respective e confidentiality of the reponsition of the reponsition of the reponsition of the reponsition of the message here. The information is internated above. Interception – For Official Use Only Staff updates HHFT repinformation received at	County's LEPC Clort, the purpose ar CE This email is ader. This messaial, proprietary, proded to be for the n of this email is y) will be included ort tracking log and disseminated	and keep an accurate record of all

	Important Steps - What? Process Segments	Desired Outcome Resultant outcome from the process step (Inputs/Outputs)	Key Points - How? (Critical to Quality)	Reasons - Why? Why for key point items
seq. 1	SERC staff checks hhft.azserc@azdeq.gov email daily for notification from railroad(s) via email at	To ensure reports are reviewed in a timely manner after receipt.	Email is checked daily.	Railroads must notify State Emergency Response Commissions (SERCs), who must provide the notification information (and updates) to any political subdivision of a State or public agency responsible for emergency response or law enforcement, upon request of the political subdivision or public agency railroads must notify SERCs, Tribal Emergency Response Commissions (TERCs), or other appropriate State designated entities who share information with appropriate local authorities, upon their request.
SEQ.2	SERC staff notifies SERC Executive Director upon receipt of report.	To keep Executive SERC Director informed when reports are received.	Send notification via email to Executive Director upon receipt of report.	Ensure the Executive Director of AZSERC is aware of the reasonable estimate of the number of implicated trains that are expected to travel, per week, through each county within the applicable state. Identification of the routes over which such liquid will be transported. Identification and a description of the Class 3 flammable liquid being transported on such trains and applicable emergency response information, as required by regulation and reasonable estimate of the number of HHFTs that are expected to travel, per week, through each county within the state.
SEQ.3	Executive Director reviews report(s).	Provides direction to staff if other than routine dissemination.	Meet with or email staff to provide direction about reports that convey anything other than routine information.	Ensure the Executive Director of AZSERC provides direction for staff to maintain compliance with dissemination of information received from the railroads.
SEQ.4	SERC staff reviews report and identifies counties that are impacted.	Send HHFT confidential information to those counties who could be impacted.	Send notification via email by 1) verifying recipients email address 2) providing HHFT procedure instructions 3) email confidential reports and require confirmation of receipt.	Following an audit conducted by the General Accounting Office (GAO), PHMSA received a recommendation (GAO-17-91) to develop a process for regularly collecting information from SERCs on the distribution of the railroad-provided hazardous materials shipping information to local planning entities.
SEQ.5	Staff prepares email for the respective County's LEPC Chairperson and FD Chief(s) explaining the confidentiality of the report, the purpose and use. Email will include a disclaimer:	Provide confidential HHFT reports that affects specific counties.	Provide reports to LEPC Chairperson(s) and FD Chief(s) via email explaining the confidentiality of the report, the purpose and its use. Email will include a disclaimer.	To reduce the consequences and, in some instances, reduce the probability of accidents involving trains transporting large quantities of flammable liquids.
9	Staff attaches report to the email and sends within five business days of receipt of report.	Provide confidential HHFT reports that affects specific counties.	Provide reports to LEPC Chairperson(s) and FD Chief(s) via email explaining the confidentiality of the report, the purpose and its use. Email will include a disclaimer.	To reduce the consequences and, in some instances, reduce the probability of accidents involving trains transporting large quantities of flammable liquids.
ш	Staff updates HHFT report tracking log and keep an accurate record of all information received and disseminated.	Provide accountability and a tracking mechanism of what counties have been provided HHFT information.	Staff enters the information on an HHFT tracking log.	Accountability for information disseminated.
SEQ.8	Staff prepares report of receipt and dissemination for SERC meeting.	Provide accountability and a tracking mechanism of what counties have been provided HHFT information.	Report to SERC from staff complies with any requirements for dissemination of the HHFT reports.	Provides an update to SERC regarding what information has been disseminated on their behalf in accordance with PHMSA 49 CFR Parts 171, 172, 173, 174, and 179.

Email Verification - for High Hazard Flammable Train (HHFT) Information

Good afternoon,

I am contacting you on behalf of the Arizona State Emergency Response Commission (AZSERC). Please reply to this email and confirm that this is an email address where you can receive confidential High-Hazard Flammable Train (HHFT) information from AZSERC.

Per the Commission only LEPC Chairs and Fire Department Chiefs are to have access to this information. If you do not fall in the category of either a Chairperson for an LEPC or Fire Chief, please let me know so that I may make the correction on my end.

Please reply to this email with your title, name of fire department or fire district. Upon confirmation that you will be the only person with access to the information and are either a Fire Chief or LEPC Chair I will send the process for the dissemination of HHFT information that was approved by the Commission at the May 25, 2021 meeting.

Please let me know if you have any questions.

Good morning,

Thank you for replying and confirming your email.

Below is information to help better understand the reason AZSERC has developed the HHFT dissemination process. Please take the time to review the attached process which includes entity responsibilities.

## **HHFT Background Information**

On February 28, 2019, the Pipeline and Hazardous Materials Safety Administration (PHMSA) published a final rule titled, "Hazardous Materials: Oil Spill Response Plans and Information Sharing for High-Hazard Flammable Trains (FAST Act)" [HM-251B; 84 FR 6910]. In part, the final rule requires a railroad to share information about high-hazard flammable train (HHFT) operations with each state's emergency response commission (SERC), Tribal Emergency Response Commission (TERC), or other appropriate Statedelegated agency in each State through which it operates to improve community preparedness. At a minimum, railroads must provide: (1) A reasonable estimate of the number of HHFTs that the railroad expects to operate each week, through each county within the State or through each tribal jurisdiction; (2) The routes over which the HHFTs will operate; (3) A description of the hazardous materials being transported and all applicable emergency response information required by the shipping papers and emergency response information requirements of the Hazardous Materials Regulations (HMR); (4) An HHFT point of contact; and (5) A description of the response zones (including counties and states) and the contact information for the qualified individual and alternate as specified under § 130.120(c) if a route identified above is additionally subject to the comprehensive spill plan requirements. The HHFT notification must be maintained and transmitted in accordance with the following: (1) Railroads must update the notifications for changes in volume greater than 25%; (2) Notifications and updates may be transmitted electronically or by hard copy; (3) If the disclosure includes information that a railroad believes is security sensitive or proprietary and exempt from public disclosure, the railroad should indicate that in the notification; (4) Each point of contact must be clearly identified by name or title, and contact role (e.g., qualified individual, HHFT point of contact) in association with the telephone number. One point of contact may fulfill multiple roles; and (5) Copies of the railroad's notifications made under this section must be made available to the Department of Transportation upon request.

## **HMEP Recipients' Role in Collecting HHFT Information**

Following an audit conducted by the General Accounting Office (GAO), PHMSA received a recommendation (GAO-17-91) to develop a process for regularly collecting information from SERCs on the distribution of the railroad-provided hazardous materials shipping information to local planning entities. In response to this recommendation, On September 30, 2020, PHMSA received approval to have Hazardous Materials Emergency Preparedness (HMEP) grant applicants/recipients declare if SERCs/TERCs have received

copies of the railroad-provided information detailed above. In addition, PHMSA received approval to determine if the SERCs/TERCs are disseminating this information to local planning entities.

I have attached the HHFT process for your review. Please let me know if you have any questions or concerns.

Attached HHFT Process

Subject Line:

## HHFT - Confidential Not for Public Dissemination - For Official Use Only

Good afternoon,

## Please acknowledge receipt of this email and its confidential content.

Your county has been identified as being impacted by the report(s) attached to this email.

You may use this information to update HazMat ERPs to prepare for and train for hazmat incidents and/or incidents involving HHFTs. The information in the report(s) must remain confidential.

Please let me or Laura Malone, AZSERC Executive Director know if you have any questions or concerns.

You may contact Laura Malone at -malone.laura@azdeq.gov or 602-771-4567.

Attach: Reports and HHFT Process