




U.S. Chemical Safety and Hazard Investigation Board

Office of General Counsel

Memorandum

To: Chairperson and Board Members

From: Christopher Warner 

Cc: Manuel Gomez
Daniel Horowitz
Bill Hoyle
John Vorderbrueggen

Subject: Board Action Report – Notation Item 408A

Date: March 28, 2006

On March 24, 2006, Notation Item 408A, which would have provided for the adoption of a revised investigation report and recommendations on the incident at the MFG Chemical, Inc. facility in Dalton, Georgia, expired without definitive action by the Board. A Board Member's dissenting comments are attached to this memorandum.

Voting Summary – Notation Item 408A

Disposition: EXPIRED

Disposition date: March 24, 2006

	Approve	Disapprove	Calendar	Withhold	Not Participating	Date
Chairperson Merritt	X					3/16/2006
Member Bresland		X				3/23/2006
Member Visscher					X	

U.S. Chemical Safety and Hazard Investigation Board

Notation Item 408A

MFG Investigation Report Draft 8 Board Vote

John Bresland Dissent Comments

March 23, 2006

Contributing Causes: Section 7.2 paragraph 3

“The Dalton City Police Department procedures did not adequately address unprotected entry into a known or suspected hazardous area. Thirteen police officer required decontamination and treatment for exposure to the toxic chemical while evacuating residents.”

This is described as a contributing root cause to the top event “personal injury from exposure to a toxic chemical”.

Bresland Comment

The sequence of events following the accident was as follows:

1. 9.34 pm – MFG calls 911 to report a “chemical spill” asking for fire department response
2. Responding fire truck requests police department response to prepare for evacuation of residents.
3. The police entered the neighborhood to evacuate nearby apartments and a subdivision
4. A police sergeant instructed one of his officers to go door to door.
5. All of the responding officers reported significant noxious odors
6. Twenty minutes into the evacuation the police lieutenant directed his officers to leave the area and had them replaced by SCBA equipped fire crews.
7. Five officers required transportation to the hospital

My take on this sequence of events is that the police officers had no option but to enter the contaminated zone to warn the residents and assist with the evacuation. Had they not, they probably would have been severely criticized for not attempting to protect the residents. As first responders, police officers have to put themselves at risk in many types of situations. Police officers in a situation like this have been frequently called “blue canaries” because they are usually the first on the scene and in many cases without appropriate protective equipment. The fire department communication requesting that the

police department assist in the community warning and evacuation made no mention of the possible hazards of allyl alcohol.

I don't believe that there is any perfect response in a situation like this. A reverse 911 warning system would have been partially effective; a community siren system may have helped. A more logical response into the community would have been by the fire department personnel who were equipped with SCBAs. Did the fire department have sufficient personnel for such a response? Would they have been able to communicate verbally through the SCBA? Did the city have a plan for a response to a toxic release into the community and, if they had one, would the response plan have called for unprotected police officers to enter the community?

I recommend that Contributing Cause (3) be deleted from the report. An alternative Contributing Cause could be that "the City of Dalton emergency response procedures did not appropriately address the issue of emergency response to a toxic gas release into a residential community."