Recommendation Text:

Recommendation Number 2004-9-I-GA-R10:
Establish a Local Emergency Planning Committee to assist the Whitfield County Emergency Management Agency to:
- Develop site-specific agency emergency response plans and standard operating procedures,
- Develop training programs and conduct drills for emergencies at fixed facilities,
- Educate the community regarding proper protective actions, such as shelter-in-place and evacuation procedures.

Recommendation Number 2004-9-I-GA-R11:
Work with the City of Dalton, representatives from local facilities, and relevant community representatives to review and revise the Emergency Operations Plan to:
- Update the list of facilities handling hazardous chemicals, including those covered by the EPA Risk Management Program regulation,
- Develop standard operating procedures addressing communication of emergency information, evacuation, and shelter-in-place,
- Conduct community training and drills that involve operation of the emergency notification system and potential actions in the event of an emergency,
- Implement an automated community emergency notification system.

Board Status Change Decision:

A. Rationale for Recommendation

On April 12, 2004, MFG Chemical (MFG) was attempting to make a first full-scale production batch of triallyl cyanurate (TAC) at its Callahan Road Plant in Dalton, Georgia. Shortly thereafter, a runaway chemical reaction over-pressurized the 4000-gallon reactor and caused the release of highly toxic, flammable allyl alcohol and toxic allyl chloride into the nearby community. More than two hundred families were evacuated, one employee received chemical burns and 154 people, including 15 police and ambulance personnel, required decontamination and treatment for chemical exposure.

The CSB investigation found that the Whitfield County Emergency Response Plan did not include a community shelter-in-place or an effective evacuation plan, nor did it provide prompt notification to the affected residents and businesses. Further, the investigation found that the Dalton City and Whitfield County emergency response agencies did not have the hazmat team personal protective equipment and air monitoring devices needed to respond safely to the toxic chemical release. The investigation also found
that the Dalton City Fire Department incident command did not direct all unprotected emergency response personnel to remain a safe distance away from the advancing toxic vapor cloud. The incident command also allowed inadequately protected MFG employees to reenter the toxic vapor cloud. The only decontamination station was more than five miles away from the perimeter of the evacuation zone, contributing to the spread of toxic material and exposure to additional personnel.

To correct these deficiencies, the CSB issued two recommendations to Whitfield County, Recommendation Nos. 2004-9-I-GA-R10 and R11.

B. Response to the Recommendation

Regarding Recommendation No. 2004-9-I-GA-R10, Whitfield County has established a Local Emergency Planning Committee (LEPC) that is assisting the Whitfield County Emergency Management Agency to establish emergency response programs outlined in the CSB recommendation. The LEPC meets six times per year and makes their activities and materials available on a website: http://www.whitfieldcountyga.com/ema/lepc.htm. Whitfield County has also created site specific emergency response plans, conducted emergency management training exercises, and communicated with the public about emergency response procedures via the Whitfield County LEPC website, social media, participation in events, and local media.

Regarding Recommendation No. 2004-9-I-GA-R11, Whitfield County has worked with the City of Dalton, representatives from local facilities, and relevant community representatives to review and revise the Emergency Operations Plan as outlined in the CSB recommendation and to develop a Community Hazardous Materials Contingency Plan. The current Emergency Operations Plan, updated in July 2012, and Contingency Plan, updated in 2013, are available on Whitfield County LEPC’s website (http://www.whitfieldcountyga.com/ema/lepc.htm). Whitfield County has also instituted an emergency notification system, developed standard operating procedures for emergency response activities and their emergency notification system, and conducted a full scale hazardous materials emergency response exercise. The hazardous materials emergency response exercise will be conducted every other year.

C. Board Analysis and Decision

As Whitfield County met the intent of the recommendations by implementing the actions described above, the Board voted to change the status of CSB Recommendation Nos. 2004-9-I-GA-R10 and R11 to: “Closed - Acceptable Action.”