

CAMEO Stakeholders Discussion Questions

Development Issue: Data Standard

1. Is the present Tier2 Submit submission file adequate for your organization's use?
 - a. **County Field issue: validation limiting county name from one of 120 listed i.e. not allowing typing errors or the word county added to field. Addressed by Jon Reinsch for Kentucky facilities in the 2015 edition.**
 - b. **Chemicals in Inventory: change EHS checkbox to Is this an EHS yes/no**

Development Issue: Web Accessible Suite:

1. How many submitters do you have? (For a state accepting only Tier2Submit submissions, this would be the number of .t2s files.) **1688**
2. How does the number of submissions you receive per day vary over time?
 - a. **Dec 22 – Jan 17 = 95**
 - b. **Jan 18 – Jan 31 = 145**
 - c. **Feb 1 – Feb 14 = 369**
 - d. **Feb 15 – Mar 1 = 945**
 - e. **Mar 2 – Apr 13 = 134**
 - f. What is the percentage of total submissions that arrive in February? **February = 1304**
 - g. Is there a big rush just before the deadline? **945 Last two weeks of Feb**
3. Approximately, how many Tier2 facilities are in your state? As of Mar 31, 2015 = 4752
 - a. How many chemicals (**16545**) in inventory and contacts (**5290**) do they have?
4. Does your state envision/anticipate needing to continue to accept Tier2Submit stand alone for other systems data? **Yes**
5. Do you currently do anything to verify the identity of the sender of a submission? **State provides limited review of data, specifically looking for errors and EHS facilities. LEPCs burden responsibility for complete review and request for additional and/or update of erroneous information.**
6. What security controls do you require for web applications that run on your servers? **KYEM servers fall under regulation by Department of Military Affairs. Access limited.**
7. Based on the document outline attached, do you have access to IT resources that would make it possible for your state to manage software resources, maintenance, and updates on a state/local level?
 - a. **State already utilizes a web collection system for tier2 reports to include state payments of required fees. Kentucky would not participate in a program unless it incorporated fee collection application. For sharing purposes KYEM staff could upload statewide reports to a system.**
State does not have dedicated staff to task with:
 - b. Database server and web server hardware are required. The servers may run either Windows or Linux. Host software for the virtual machine or application container would be required (free options are available).
 - c. States must register a domain name and SSL certificate through third-party providers.

- d. An experienced system administrator would install and configure the application, manage user accounts, monitor server resources (CPU, memory, and disks), and apply the updates we provide.
 - e. States would provide technical support to users. Some training material would probably be available from the CAMEO team.
8. Please address your concerns or ideas regarding the importance/priority of the following:
- a. Electronic signatures- #5
 - b. IT security – running virtual machines, managing log in for facilities- #4
 - c. Access to information – how would LEPCs, fire services, and other emergency responders get access? - #2
 - d. Data unique to the state- #1
 - e. Other concerns/ideas that you state may have with a server-based Tier2 Submit program- #3 i.e. funding for support staff
9. Are there other options in lieu of creating a web accessible suite for CAMEO?

Development Issue: Training and Outreach

1. Estimate the awareness of CAMEO in your region, state, or local area (% of LEPCs know/use)?
Kentucky LEPCs 100% aware – SERC solely recommends CAMEO as planning platform for all EPCRA Section 303 Plans. 86% of Kentucky LEPCs (99 of 118) require electronic reporting (Tier2Submit). Estimated 50% actively use CAMEO in developing 303 plans.
2. Would an online training or another type of training for CAMEO be helpful to your organization?
YES!
 - a. For these types of training, what topics would be the most helpful?
 - a. GIS mapping of EHS facilities
 - b. Plume modeling development and determining vulnerable zones
 - c. GIS mapping of chemical transportation and evacuation routes
 - d. GIS mapping of special facilities and local populations
 - e. Importing support documents, e.g., facility maps
 - f. Developing worst credible releases
 - b. What is the most effective length of time for an online training module (# of minutes/sessions)? Develop base modules that can be completed in 60 minutes or less and 4 hours or less. What topics should be covered in each session/module?
Any of those listed above
3. Have you heard of *CAMEO Companion*? YES If yes, would updating that be helpful to your organization? YES
4. Do you have advice on how to better reach LEPCs and fire departments about the benefits of CAMEO? Develop a series of online CAMEO training modules that highlight the most common aspects of 303 planning. Modules should be short 60 minutes or less, should include reference materials for access later by students, and should include brief practical application exercises. Please share any conferences or other venues that you think would be appropriate for outreach to these stakeholders.

Development Issue: Mobile Apps

1. Is there anything other than an EPCRA facility data viewer (no user editing) and CAMEO chemicals that you would envision in a mobile app? **NO**
2. Would a static map generated from Marplot (as opposed to requiring internet access to view maps) be useful to your organization to view EPCRA data? **NO**
3. Would a map with DOT Emergency Response Guide (ERG) Protective Action Distances (PAD) and initial isolation distances meet your organization's needs? **NO**

CAMEO Stakeholders Discussion Questions

Development Issue: Data Standard

1. Is the present Tier2 Submit submission file adequate for your organization's use?

Development Issue: Web Accessible Suite:

1. How many submitters do you have? (For a state accepting only Tier2Submit submissions, this would be the number of .t2s files.) @1400 submittals via email – some emails have more than one submittal
2. How does the number of submissions you receive per day vary over time? More in January, then tapers off, then the majority the last week of March. We also get many late submittals @ 40 or so. What is the percentage of total submissions that arrive in February? Low – 10%? Is there a big rush just before the deadline? Yes the majority come in March – especially the last week (over 50%)
3. Approximately, how many Tier2 facilities are in your state? How many chemicals in inventory and contacts do they have? @11,000 facilities – the amount of chemicals varies on the type of company, for example, oil and gas have a lot of chemicals. All fill in the contact lists and generally have at least 2 contacts (but fill in all of the fields with the same contact if needed).
4. Does your state envision/anticipate needing to continue to accept Tier2Submit stand alone for other systems data? I am not sure what this question is asking.
5. Do you currently do anything to verify the identity of the sender of a submission? We ensure it is from the company (via email address or a viable consultant)
6. What security controls do you require for web applications that run on your servers? I do not have the answer to this question and would have to ask IT
7. Based on the document outline attached, do you have access to IT resources that would make it possible for your state to manage software resources, maintenance, and updates on a state/local level? I believe we can make the request, but it would not be cut and dry and would be a cumbersome process. Cost would be associated and also CDPHE offices would have to work with State OIT, etc.
8. Please address your concerns or ideas regarding the importance/priority of the following:
 - a. Electronic signatures Accepted
 - b. IT security – running virtual machines, managing log in for facilities not sure
 - c. Access to information – how would LEPCs, fire services, and other emergency responders get access? This would have to be discussed and also, if there is a cost associated with design and maintenance on CDPHE side.
 - d. Data unique to the state
 - e. Other concerns/ideas that you state may have with a server-based Tier2 Submit program
9. Are there other options in lieu of creating a web accessible suite for CAMEO?

Development Issue: Training and Outreach

1. Estimate the awareness of CAMEO in your region, state, or local area (% of LEPCs know/use)?
2. Would an online training or another type of training for CAMEO be helpful to your organization?

- a. For these types of training, what topics would be the most helpful?
 - b. What is the most effective length of time for an online training module (# of minutes/sessions)? What topics should be covered in each session/module?
3. Have you heard of *CAMEO Companion*? If yes, would updating that be helpful to your organization?
4. Do you have advice on how to better reach LEPCs and fire departments about the benefits of CAMEO? Please share any conferences or other venues that you think would be appropriate for outreach to these stakeholders.

Development Issue: Mobile Apps

1. Is there anything other than an EPCRA facility data viewer (no user editing) and CAMEO chemicals that you would envision in a mobile app?
2. Would a static map generated from Marplot (as opposed to requiring internet access to view maps) be useful to your organization to view EPCRA data?
3. Would a map with DOT Emergency Response Guide (ERG) Protective Action Distances (PAD) and initial isolation distances meet your organization's needs?

CAMEO Stakeholders Discussion Questions

Development Issue: Data Standard

1. Is the present Tier2 Submit submission file adequate for your organization's use?

REPLY: Yes. Utah has tailored management of Tier2 data around the Tier2Submit file format.

Development Issue: Web Accessible Suite:

1. How many submitters do you have? (For a state accepting only Tier2Submit submissions, this would be the number of .t2s files.)

REPLY: Utah is in receipt of 792 .t2s files. This number does not reflect non-.t2s submissions received.

2. How does the number of submissions you receive per day vary over time? What is the percentage of total submissions that arrive in February? Is there a big rush just before the deadline?

REPLY: Number of submissions increases as the March 1 deadline approaches. Number of submissions received in February was 700 of 792 (88%). The total 792 does not include non-.t2s submissions.

3. Approximately, how many Tier2 facilities are in your state? How many chemicals in inventory and contacts do they have?

REPLY: Approximately 1200 facilities, number of chemicals in inventory and contacts has not been determined at this time.

4. Does your state envision/anticipate needing to continue to accept Tier2Submit stand alone for other systems data?

REPLY: Yes. To clarify, our agency has a vested interest in receiving the end-product from the EPA Tier2Submit application - the submission data in the .t2s file format. As the product of stand-alone application, the .t2s file is used by our agency to populate our database system.

5. Do you currently do anything to verify the identity of the sender of a submission?

REPLY: A submitter must register a user login account in the DEQ online portal and should relate the user account to a facility record.

6. What security controls do you require for web applications that run on your servers?

REPLY: Must meet state security requirements. Tier 2 users must register with a user account to gain access to the Tier 2 data system.

7. Based on the document outline attached, do you have access to IT resources that would make it possible for your state to manage software resources, maintenance, and updates on a state/local level?

REPLY: Not at this time. IT resources would be allocated per joint decision made by senior management and technology services.

8. Please address your concerns or ideas regarding the importance/priority of the following:

- a. Electronic signatures

REPLY: Satisfy Utah requirements.

- b. IT security – running virtual machines, managing log in for facilities

REPLY: Satisfy Utah requirements.

- c. Access to information – how would LEPCs, fire services, and other emergency responders get access?

REPLY: Satisfy Utah requirements.

- d. Data unique to the state

REPLY: Satisfy Utah requirements (Utah does not require information beyond the federal Tier2 requirements).

- e. Other concerns/ideas that you state may have with a server-based Tier2 Submit program

REPLY: As warranted by decision to participate.

9. Are there other options in lieu of creating a web accessible suite for CAMEO?

REPLY:

Development Issue: Training and Outreach

Note: In Utah, the State Fire Marshal's Office and the Department of Public Safety Division of Emergency Management have regular contact with first response personnel (Fire) and LEPCs across the state. For this reason DEQ requested assistance from those agencies to respond to the questions posed in this section of the questionnaire. Representatives from these offices have provided the information presented in this section in response to the questions posed.

1. Estimate the awareness of CAMEO in your region, state, or local area (% of LEPCs know/use)?

REPLY: State Fire Marshal's Office (SFMO) estimates about 70% of fire fighters are familiar with the acronym (it is a test question for certification). SFMO estimates about 70% of the LEPCs have active members who are familiar with CAMEO. A smaller fraction of the LEPC membership is familiar with CAMEO capability to model a hazmat event. State Fire Marshal's Office estimates that personnel in about seven of the larger metropolitan areas of the state have used CAMEO intermittently in the last 8 years. SFMO offers the belief that several people along the Wasatch Front are proficient enough to have used CAMEO in real-time events.

2. Would an online training or another type of training for CAMEO be helpful to your organization?

REPLY: Yes. This is a good way to do refresher training. Record and post the initial training via YouTube to enable access by a wider audience. SFMO estimates between 75-80% of responders are volunteers that work days or odd schedules and many would benefit from CAMEO training. Furthermore, LEPCs in Utah are organized in such a way that the LEPC chair may be occupied by a government or non-government employee. Some LEPCs alternate the chair and vice-chair positions between government and industry employees to maintain a balance in interest between both sectors.

- a. For these types of training, what topics would be the most helpful?

REPLY: The CAMEO package is a good starting point (first exposure) because it offers a variety of related applications and usage. First exposure sponsored by an LEPC and hosted at law enforcement locations, fire stations or other suitable public place (library, school, etc.) with internet connectivity.

Initial instruction should include introduction to: the menu system, the relationships between applications, map overlays and how to get them, and common terminology.

Prepare and make available a pre-training document packet (e.g. pdf) with instructions on how to: download the suite, download maps, complete basic installation, and instruction showing typical, practical basic tasks. Document should contain screen-shots and be indexed. Follow the above instruction with a specific scenario.

- b. What is the most effective length of time for an online training module (# of minutes/sessions)? What topics should be covered in each session/module?

REPLY: In an effort to increase familiarity, initially, live instruction introduction to CAMEO would be best. This can be followed with short (5-10 minute) technology-based training sessions to introduce various components of the CAMEO Suite and simple practical tasks (e.g. draw circle, measure distance, find a map, download a map, link map to application, call up a chemical, find a location set a scale, etc.).

Additional segments of 40-50 minutes can be used for task-driven topics that present a scenario: “using your current location, plot a plume for an anhydrous ammonia leak from a one-ton cylinder at 12:00 noon with a temperature of 85F and 5 mph wind from the south. Repeat the exercise for the same scenario at 10:00 PM with temperature of 60F, and winds at 10 mph from the north.

Have sessions available as online training presentations (e.g. internet videos, YouTube, etc.). Online can be accessed by the widest audience anytime and is a

best-fit to maximize access and availability for the variety of work and personal schedules kept by the volunteer response community.

3. Have you heard of *CAMEO Companion*? If yes, would updating that be helpful to your organization?

REPLY: SFMO estimates less than 5% of LEPC and responder community know of CAMEO Companion. Suggest CAMEO Companion be updated, and if so 85%+ of LEPCs in Utah would know about it within 12 months of the update. Furnish a PDF instruction packet sent as a pre-course as mentioned above.

4. Do you have advice on how to better reach LEPCs and fire departments about the benefits of CAMEO? Please share any conferences or other venues that you think would be appropriate for outreach to these stakeholders.

REPLY: SFMO trainers can be trained and deliver training via LEPC meetings. SFMO try to attend and contribute to all LEPCs at least quarterly (Utah has a total of 32 LEPCs). Other annual events: Utah Governor's Public Safety Summit Conference (May), LEPC workshop (March). SFMO supported suburban and rural outreach classes for about 3-10 locations per year.

Development Issue: Mobile Apps

1. Is there anything other than an EPCRA facility data viewer (no user editing) and CAMEO chemicals that you would envision in a mobile app?

REPLY: Defer to Department of Public Safety Division of Emergency Management & State Fire Marshal's Office.

DEM - Yes a interaction that would allow for the uploading of static maps that are outlined in the EOP's

2. Would a static map generated from Marplot (as opposed to requiring internet access to view maps) be useful to your organization to view EPCRA data?

REPLY: Defer to Department of Public Safety Division of Emergency Management & State Fire Marshal's Office.

DEM - Yes static maps can assist in both the develop of emergency action plans and tactical action plans.

3. Would a map with DOT Emergency Response Guide (ERG) Protective Action Distances (PAD) and initial isolation distances meet your organization's needs?

REPLY: Defer to Department of Public Safety Division of Emergency Management & State Fire Marshal's Office.

DEM - Response Maps would support the planning process at both the incident command post and in the long range planning process when developing emergency action plans.

Miscellaneous notes submitted:

1. Estimate the awareness of CAMEO in your region, state, or local area (% of LEPCs know/use)? **30-40% of the LEPCs in Texas. In addition I would say 50% of the COGs know and are either using CAMEO or beginning to use it.**
 2. Would an online training or another type of training for CAMEO be helpful to your organization? **Yes**
 - a. For these types of training, what topics would be the most helpful?
Overview, Uses/Case scenarios, Hands on with each of the CAMEO suite – CAMEO, ALOHA, MARPLOT as well as CAMEO Chemicals
 - b. What is the most effective length of time for an online training module (# of minutes/sessions)? **60 minutes** What topics should be covered in each session/module? **The modules should have a focus – just like the CAMEO Companion. Emergency Planner perspective; First Responder; Data Manger either at the state, local or regional. The topics will change depending on the audience with the exception of the Overview Module.**
 3. Have you heard of *CAMEO Companion*? If yes, would updating that be helpful to your organization? **Definitely!**
 4. Do you have advice on how to better reach LEPCs and fire departments about the benefits of CAMEO? Please share any conferences or other venues that you think would be appropriate for outreach to these stakeholders.
 - TX Division Of Emergency Management 2015 Texas Emergency Management Conference Tuesday, May 12 – Friday, May 15, 2015; Location: Henry B. Gonzalez Convention Center, San Antonio, TX
 - HotZone: – **HOTZONE Conference October 22 – 25, 2015** Houston, Texas Crowne Plaza Hotel – near Reliant Park
 - TX County Judges Conference: Unable to find 2015 Annual Meeting Information. Here is the 2014 Information: Annual Conference of the County Judges and Commissioners Association of Texas was conducted in Lubbock County, Texas, Sept. 29-Oct. 2, 2014
 - Work with Junior Colleges or Universities to provide college credit for the CAMEO Class
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Overview Comments:

1. The CONCEPT of a hosted, server-based CAMEO is good with us, but the implementation USEPA is proposing is problematic. They essentially want to build an application and then hand it to the states to resolve the technical/security/integration issues that inevitably come with such a deployment. USEPA generally recognizes these issues and has much better technical support – usually third party vendors – that are available to the states to assist in deployment as well as modify the system to accommodate different deployment environments. We also have to recognize that the environment in which CAMEO would be hosted is OIT's, not EPA's, and we have to adhere to their rules which are very standards and security based.
2. SO, in a nutshell, here are some of our initial concerns:

- In the vision document they state that they would use an open source database (e.g. Postgress, MySQL) and this is not acceptable to us. Open source databases are security risks and difficult to manage for large scale applications. We use and support Oracle or SQLServer databases.
- We don't have experience with deployments inside a virtual machine so we have some apprehension about those methods and concerns about whether or not they would even be allowed in the OIT environment.
- The Vision document implies database user authentication which would bypass the AD authentication the state uses. This would eliminate single-sign-on for EPA users and probably generate serious problems for OIT regarding non-state employee users. There is no mention of any CROMERR related requirements and we would normally choose to provision an application like this through the eBusiness Center.
- Hardware to host this environment would be a minimum of \$500/month plus storage.
- IT personnel costs to administer the system, perform upgrades, monitor performance, etc. are difficult to assess but there is little wiggle room in staff resources as is.
- The Vision document states that states would provide technical support to users – our experience shows that users require a fair amount of support and this support would wind up being program resources first, IT resources second.
- There are integration issues that must be addressed as well; use of CAMEO would not eliminate the need to maintain CORE data for the RTK facilities and sites since there are eDocument and Revenues consideration to take into account. There would likely be additional manual work that had to be done to maintain CORE/Revenues/eDocuments.

Questions 6-8 from the Stakeholder Discussion Questions:

3. State of Ohio standards – Skip could provide these if necessary but it is likely they are very close to federal requirements.
4. We access to the resources necessary but we will have to bear the costs of those resources.
5. Probably OK
6. Running the virtual machines provided is an unknown – we would need more information to provide a definitive answer but I suspect that this is an area of contention.
7. Getting LEPCs and other users access would create problems. Currently all access to these kinds of systems is made available via the State's AD authentication model and using another model will not only be a step backwards in standardization efforts, but create another environment to manage and administer, if allowed.
8. Other than any revenues-specific data stored in the current RTK system, the program area SMEs will have to answer this question.
9. See above.
10. The best solution – and this does not address the EPA resource support issue – would be for USEPA to package and support a full blown system supporting multiple operational environments and deployment methods.

Web Based Cameo –

1. A Hosted Option: For states having difficulty with a state-hosted solution, the option of a US EPA hosted solution similar to TRI-Me Web, which US EPA hosts and maintains the user accounts, would be helpful. The SERC, LEPC and fire departments could have special accounts for access to data for the county or state. US EPA partially funded the development of E-Plan, so one would think it already owns the programming behind such a system.

2. The State Hosted System would need the following abilities:

- One-Stop reporting ability – in order to meet the one stop reporting requirements, the reports must be accessible to the LEPCs and SERC by the reporting deadline. Unique user accounts would be needed for LEPCs and Fire Departments which would provide restricted access on a county level, along with state-wide access accounts for SERC officials.
 - A reporting data entry module for Tier 2 reports, similar to Tier2Submit would be helpful.
 - Export Feature in Cameo and Excel – Similar to Tier2Submit, we need the ability to export the data and import the file into the non-web based Cameo or Excel.
 - US EPA User Support – Similar to TRI, it would be helpful if US EPA could provide the user support on the software through the EPCRA hotline or an alternate hotline.
 - Online User Tutorials – For TRI-Me Web, US EPA maintains numerous, professional looking, short videos on each step in using the web-based software. I would encourage US EPA to develop short videos for web-based cameo to assist both the state agencies and the regulated community.
 - The system would need to be able to store multiple years of Tier 2 reports.
 - A reporting feature for the initial notification report with a list of chemicals (or attached MSDSs) would also be helpful.
 - The ability to generate reports for public record requests with the ability to with-hold the confidential location information.
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My comment would be that in SD we do not require facilities use Tier 2 submit.

That said, we always offer facilities the option to use Tier 2 submit,

Less than 10% of our reports are submitted using Tier 2 submit (for the most part, facilities owned by large companies that are submitting reports in several different states).

Many smaller facilities find it hard to use.

They are often very frustrated.

Facilities have tremendous difficulty determining why reports fail to pass validation.

So, since most of our reports are not submitted using Tier 2 submit, when it comes to CAMEO, I'd suggest adding a feature that makes it very easy to input/migrate data from sources other than Tier 2 submit.

In North Dakota we currently do not use CAMEO for anything related to Tier II. Jeff Thompson our Haz-Chem Officer and myself will be attending the NASTTPO Conference in Portland Maine and we will be taking the CAMEO Training Session. I have had some CAMEO Training previously, but since we do not presently use it, the knowledge goes away.

Regarding Tier II Reporting: We utilize our own web based Tier II reporting system and it does not integrate with CAMEO.

Data Standard:

1. Yes

Web Accessible Suite:

1. 5,000 - 6,000

2. Steady submittal in January, big rush in Feb. Reports still coming in. Approx 5 to 10 a week.

3. Approx 5,500 facilities. Approx 20,493 chemicals - could be duplicates.

4. We rely on Tier 2 submit only

5. No

6. State Security Policy

7. No

8. No concerns at the State level

9. n/a

Montana has **2327** Tier II reports. They are very happy with E-Plan and do a lot of outreach on it. Montana at the state level does not use CAMEO. We use E-Plan and are training our local responders to use it, also. There are 2368 facilities in the E-Plan for 2014 along with the RMPs. EPA has access to E-Plan, so your preparedness unit can see the reports anytime, 24/7. There is also an android app some use and an iPhone app is being worked on. If you would like access let me know and we can approve you to look around and get the information you want.

Kansas

- KDHE would like Spill Release Data entered into Tier II and Mappable
- Tier 2 Manager was being considered and then cancelled since KDHE had something that could be modified; however, this talk has been stalled for over a year (KDHE-KDEM)
- Recommend: Export into Access or comparable database for query, filter and sort capabilities to produce a global report
- Cloud and/or server based wireless CAMEO program like Mobile Mapper with facility points that can be clicked on and access to Tier 2 information and other documents maintained on the server. Ideal for CAD in vehicles or tablets used by responders.
- ALOHA line segment points downloaded for placement and mapping of polygons for IPAWS alerting.
- AST and UST Tier II Forms not currently entered