CUSTOMER SERVICES
When DEQ was formed in 1993, the new agency was given a legislative mandate to be more customer friendly than the agencies that preceded it. Nine years later, the implementation of this mandate is reflected in the Customer Services activities of DEQ.

The Oklahoma DEQ was the first agency in the nation to establish a Customer Services Division. The CSD provides assistance and outreach to citizens, business and local government in all of the environmental media programs. CSD also provides laboratory services to the agency and to outside customers including other state agencies, the state's public water supply systems and citizens with environmental concerns.

CSD is only one part of DEQ's customer services attitude. Customer service is reflected in a variety of ways including the following:

- Targeting permitting and compliance assistance to an industrial sector that has run afoul of the agency through both complaints and poor inspection reports;
- Helping Oklahoma grow and prosper by working with business recruiters to assure that new businesses locating here know what is needed to comply with environmental rules;
- Becoming a national leader in assisting local organizations to plan for response to environmental emergencies;
- Providing information to local residents about potentially harmful chemicals stored and used in their cities and towns;
- Participating in national volunteer monitoring programs designed to make us all more aware of our environment and man's impact upon it; and
- Developing recognition programs for businesses and towns that go the extra mile to prevent pollution.
During FY 2003, DEQ Customer Assistance Program (CAP) participated in several permit assistance endeavors to help bring new industry to the state. In the Spring/Summer of 2003, the Huber Corporation was evaluating sites around Broken Bow, Oklahoma and comparing them to sites in other states. Through the efforts of the state’s one-stop assistance team, including the CAP, Oklahoma the Department of Commerce (DOC) and the City of Broken Bow, the oriented strand board manufacturer decided to site its new plant in Oklahoma. The CAP is one of the major contributors to the state’s one-stop assistance efforts. DEQ has been in the forefront of business recruitment efforts by participating with the DOC’s team, processing the necessary permits and ensuring that properly completed air and wastewater applications are given the highest priority.

In the late fall of 2002, a boat manufacturer, Tracker Marine, decided to build its Tahoe line of recreational fiberglass boats in Miami, Oklahoma. The CAP assisted in coordinating the permit review process within DEQ and coordinated frequently between the company, the City of Miami and the DOC. An application for a major air quality permit was submitted in late December and the construction permit was issued in record time following a public meeting and EPA review. This record-breaking effort was due to the speed and efficiency of the Air Quality Division (AQD) permit writer, Herb Neuman and the quality of the completed application. Tracker Marine began start-up in March 2003.

In the summer of 2002, an out-of-state glass manufacturer, Cardinal Glass, evaluated potential sites for a new manufacturing plant in both north Texas and southern Oklahoma. A location near Durant, Oklahoma, won the review for the new site due to the efforts of the local economic development team along with the state’s one-stop assistance team. Following issuance of air and wastewater permits from DEQ, which were facilitated by CAP, Cardinal started construction of its new float-glass plant in March 2003.

DEQ continues to be proud of the business recruitment success accomplished by the one-stop assistance team. CAP is able to provide assistance to potential industries by reviewing applicable Oklahoma rules, determining what permits are necessary and facilitating public involvement in the permitting process to insure all environmental safeguards are met. ★
One mission of DEQ is to assist the regulated community with environmental regulatory compliance issues. In that spirit, DEQ conducted outreach presentations for concrete batch plant owners/operators in Oklahoma through a joint effort by the Air Quality, Customer Services, Environmental Complaints and Local Services and Water Quality Divisions in collaboration with the Oklahoma Ready-Mix Concrete Association.

The outreach presentations were conducted in Tulsa, Ardmore, Woodward, Lawton and Oklahoma City from September 19, through October 8, 2002. The purpose of the outreach program was to inform concrete batch plant owners/operators of the applicable DEQ rules, DEQ permitting process, DEQ environmental complaints procedures and enforcement activities.

Presenters at the workshops included staff from Air Quality, Customer Service and Water Quality who discussed issues such as air, storm water and wastewater permitting. Additionally, the attendees were given information on what inspectors look for when performing an inspection or responding to a complaint. Each participant received a workshop handbook including copies of all the presentations, permit application forms and other helpful checklists. DEQ staff also provided on-site assistance to those facilities requesting it.

A total of 115 companies, representing 270 facilities, participated in the five sessions. To allow the participating companies time to become acquainted with the regulations and achieve compliance, the Department offered the conference participants a compliance period. During this time the facilities were allowed to come into compliance without concern about inspections or new enforcement actions. This compliance period, which will end after issuance of the General Permit for concrete batch plants, does not

Continued on next page
exempt the facilities from public complaint or criminal activity that could be a threat to health or the environment.

By providing the concrete batch plant outreach, DEQ is helping businesses understand what is required to achieve and maintain compliance with environmental rules. This education resulted in increased compliance by the concrete batch industry and therefore increased protection of our environment.

*DEQ employees recapping a successful CBP outreach.*

*Students are attentive during CBP outreach.*

*At the Muskogee Ready Mix, Inc. concrete batch plant, CSD’s Kyle Arthur discusses proper operation of a particulate bag house with owner, Glen Oliver.*
DEQ recently participated in the 8th annual Inter-Tribal Environmental Council Conference, which was held in Tulsa. This conference provides environmental professionals from participating tribes an opportunity to come together to discuss topics of environmental concern and attend workshops on environmental programs and current technology.

As a participant in the conference, DEQ promoted a cooperative effort among DEQ and participating tribes to compile all water quality monitoring data collected. This effort is part of a larger endeavor to compile all monitoring data for the state collected by state, federal and tribal organizations. Several tribes already have provided monitoring data in support of this program and many others have expressed an interest in participating.

To promote participation in this effort, Water Quality personnel demonstrated DEQ Data Viewer, which is a web-based Geographic Information System (GIS) program. This interactive mapping program has been chosen as a tool to provide public access to all water quality monitoring data compiled by DEQ. The presentation included a demonstration of how monitoring data will be managed and displayed through the viewer and how basic functions offered by the viewer (i.e. aerial photos) could benefit tribal environmental programs.
The Permit Section of the Air Quality Division (AQD) has successfully concluded another year of work in developing General Permits (GPs). Three GPs were issued this year. Two were new, one for the Hot Mix Asphalt Plant Source Category and one for the Printing & Packaging Source Category. The third, the Title V General Operating Permit for Crude Petroleum and Natural Gas Facilities was re-issued with a slightly narrower scope for the Natural Gas Compressor Station Source Category. Although some permittees never become aware of GP requirements until the permit is issued, many are actively involved throughout the entire process of draft permit development, issuance and implementation. In this article we hope to give you an idea of what goes on “behind the scene” in that process.

1. The first step in the process is to identify those source categories that are a priority for issuance. Typically, GPs are developed for those source categories with a sufficiently large number of facilities that have similar operations and emissions that are subject to the same or similar standards, limitations and operating and monitoring requirements. Other considerations include the need for updated permits because of new requirements, e.g., newly-promulgated MACT standards; new information, e.g., updated emissions factors; or because guidance has changed. The GPs give companies flexibility in adjusting to these changes, such as avoiding major source status by establishing a facility-wide emissions cap and obtaining a “synthetic minor” permit. Current EPA guidance is considered in adopting uniform permit conditions, e.g., in setting monitoring methods for control devices to assure continuous compliance with permit limits.

2. The second step involves the AQD staff collecting specific information about the source category - kinds of emissions units typically present at the facilities, types of control devices used, type of fuels used, typical hours of operation and any other unique factors that must be considered in permit development. This is also the point at which the Pollution Prevention Program is involved to assist in identifying pollution prevention strategies that may be included in the permit. Most of this information is available in-house (in the AQD or other DEQ divisions) or on-line in various databases and available literature. However, this step may include gathering information from both state and national trade associations, other government agencies, universities and other organizations. Once sufficient information is available, a “pencil-draft” of the GP is developed. Note that the pencil-draft GP may be a completely finished permit, a completed permit with several identified “issues of concern,” or a partially finished permit that incorporates multiple alternatives for any unresolved issues. While the pencil-draft GP undergoes all in-house review typically given any other permit, it is not issued at this time, but readied for release to other stakeholders in the process.

3. The third and perhaps one of the most important steps, is to identify other stakeholders that should be given an opportunity to provide input on the pencil-draft GP. These typically include any facility that may potentially request coverage under the permit, but can also include interested
The fourth step involves notifying the public that the draft permit is available for review and comment, responding to any comments received and incorporating any needed changes into the final permit. Note that this step frequently includes working with the regulated community to resolve any issues identified during the public review process. If everybody has “done their homework” during the third step, however, there are normally no “surprises” identified during public review.

Finally, the fifth step involves making the final permit accessible to the regulated community and ensuring that conditions in the permit are appropriately implemented. This may require development of forms, fact sheets and compliance checklists. In addition, training or workshops may be needed to educate both DEQ staff and the regulated community on specific implementation issues, e.g., a new “burner tune-up” requirement or a new inventory recordkeeping requirement. This step also involves a “technology transfer” component, in that solutions to issues resolved during development of the GP are carried over and used in GPs for other source categories or in individual permits for the same as well as similar source categories. For instance, a portable analyzer method developed to measure NO\textsubscript{x} and CO for engines may also be used for asphalt plants.

With that in mind, the AQD would like to recognize the following organizations for their efforts in making this a successful process during the last year:

- Mid-Continent Oil and Gas Association of Oklahoma
- Oklahoma Asphalt Pavement Association
- National Asphalt Pavement Association
- Printing & Imaging Association—Mid America
- Printing Industries of America

Their participation in this process has been very much appreciated. The AQD hopes to see it continued as these GPs are used by their members in the future.
Since Oklahoma is blessed with abundant disposal capacity and plentiful recycling markets, the priority for improving solid waste management is to strengthen the local waste management infrastructure. DEQ plays a vital role in helping communities make Oklahoma an even better place to live by:

**Helping communities acquire recycling equipment:** Six (6) communities used state solid waste fee money to help buy recycling equipment;

**Helping communities recycle organic waste:** The Oklahoma Solid Waste Management Act directs DEQ to use state solid waste fee money to pursue land reclamation projects using material recovered from solid waste. For example, old strip mines and oil field scars are returned to productive pastures. Last year DEQ’s conservation partners in this effort recycled wastes from 36 communities. Additionally, projects are in the planning stage for 15 other communities. For most of these towns, the project also helped their sewage treatment facilities return to compliance;

**Helping communities remove blight:** DEQ in partnership with local conservation districts offers communities opportunities for disposal of dilapidated structures. The community also benefits by using the material to reclaim scarred land. Fourteen (14) communities took advantage of this program and six (6) are currently in the planning stages;

**Helping communities recycle tires:** The Oklahoma Waste Tire Recycling Program creates a mechanism for communities to organize waste tire recycling events. These collection events help residents re-
cycle waste tires without cost. DEQ helped 60 communities organize tire recycling events. **Helping counties implement their solid waste plans:** Solid waste fee revenue is invested through the Association of County Commissioners of Oklahoma in projects to implement county solid waste plans. Fourteen (14) counties cleaned up illegal dumps, six (6) counties supported trash cop programs and fifteen (15) counties acquired brush recycling equipment that was also integral in disaster debris clean up. ★

To the left and below are photographs showing application of sewer sludge at the Morris reclamation project.

The bottom three photographs show reclamation project at Freddies Steak House in Drumright.

More Photos on next page
All four photographs on this page show recycling of organic waste.
EPA has delegated to the state of Oklahoma the responsibility for the Public Water Supply and the National Pollution Discharge Elimination System (NPDES) programs. This delegation gives DEQ primary enforcement responsibilities for the programs and requires the state to have a principal state laboratory facility, which is accredited through EPA. DEQ's State Environmental Laboratory (SEL) has been accredited by EPA's Laboratory Certification Program to fulfill this requirement for Oklahoma.

The National Environmental Laboratory Accreditation Conference (NELAC) is an association formed as a result of joint efforts by EPA, other federal agencies, the States and the private sector to foster the generation of environmental data of known and documented quality in a cost effective manner. The SEL has the same goal, which is the generation of high quality, cost-effective data. NELAC addresses the generation, documentation and quality of data through a Quality Systems Standard. The SEL has begun the implementation of this standard. A Quality System should be a structured, documented system describing the policies, objectives, organization authority, responsibility, accountability and implementation plan for ensuring quality in an organization's work processes, products and services. It is the framework for planning, implementing and assessing work performed and carrying out required quality assurance and quality control.

SEL analytical efforts have always required rigorous Quality Control/Quality Assurance (QC/QA) elements. A NELAC Quality System requires greater documentation for these processes within the laboratory. The SEL has begun incorporating components of NELAC Quality System Requirements by undertaking the following activities:

1. Laboratory managerial and technical staff reference NELAC requirements and are committed to good professional practices and the quality of environmental testing.
2. SEL QA policies and QC procedures are being NELAC enhanced through additional training and documentation and will be incorporated into revisions of the SEL Quality Manual or Quality Assurance Plan.
3. A Corrective Action procedure has been documented and implemented at the analyst level. This is a procedure that documents the root-cause of a problem, for example, a specific analysis or instrument problem is documented through the initiation of a Corrective Action Form (CAF). CAF's will be routinely reviewed for trend analysis.
4. The SEL has expanded personnel files documenting personnel qualifications, experience and training records.

5. SEL standard operating procedures now incorporate all required NELAC references (23 elements).

6. Data Integrity Procedures are written procedures that provide assurance that a highly ethical approach to testing is a key component of all laboratory processes. These procedures and an overall Data Integrity Plan are under development. This plan begins with defined analyst ethics, documented consequences, documented standard procedures, training and continued review.

All of these components are part of the SEL’s continued stair-step progression toward NELAC Accreditation. This ensures not only that customers of the SEL may rely on the quality and accuracy of the data provided, but also that EPA’s requirements for delegation will continue to be met.
DEQ has made an effort to incorporate pollution prevention (P2) concepts and methods into its regulatory efforts. The P2 Program staff provides pollution prevention options for several activities including inspections, permit conditions and enforcement actions. Regulatory integration of pollution prevention has been accomplished through extensive staff training and forming working relationships with compliance, enforcement, permit and rule development staffs across the agency divisions.

When alternatives are presented early in the permitting process, a facility may be able to modify the materials it uses and/or the design of its process to prevent pollution. Often this occurs during the design for a new operation or a major modification at an existing facility. Pollution prevention is presented as a voluntary option to potential permit applicants prior to their application for a permit. This year the P2 Program worked with the Air Quality Division (AQD) to help identify pollution prevention strategies to be included in AQD General Permits.

In partnership with the Water Quality Division (WQD) Pretreatment Program and the Pretreatment Coordinators Association, there was outreach to food handling/service facilities. Residual fats, oils and grease (FOG) are by-products that food service establishments must constantly manage. Typically, FOG enters a facility’s plumbing system from ware washing, floor cleaning and equipment sanitation. Sanitary sewer systems are neither designed nor equipped to handle the FOG that accumulates on the interior of the municipal sewer collection system pipes. Sanitary sewer overflows are often the result of pipe blockages from FOG accumulation from residential, institutional and commercial sources. The best way to manage FOG is to keep the material out of the plumbing systems. The outreach provided suggestions for proper FOG management.

The regulated community, businesses and the public at large have met these efforts with broad acceptance.
In 2001 the Pollution Prevention (P2) Program began a pilot voluntary outreach program, the Oklahoma Environmental Performance and Recognition Program (EPRP).

The EPRP is a public recognition and technical assistance program that acknowledges and supports businesses or organizations with a vision and desire to move towards environmental excellence and long-term environmental and economic sustainability. The EPRP is based on the national Malcolm Baldrige criteria. The Baldrige process and criteria are designed to enhance the competitiveness, quality and productivity of organizations. The criteria provide a systems perspective for understanding performance management and reflect validated, leading-edge management practices. The criteria represent a common language for communication among organizations for sharing best practices and serve as the model for performance excellence. The EPRP incorporates environmental management into the traditional Baldrige criteria.

Currently there are four industrial facilities and one university participating in the pilot. After recruitment, initial training and developing the applicable self-assessment questions, the participants are now in the process of deploying the questionnaire. This easy-to-use questionnaire helps to assess organizational performance and identify areas for improvement. Based on the Baldrige Criteria for Performance Excellence, the questionnaire helps to focus improvement and communication efforts on areas needing the most attention. This process provides these facilities the opportunity to explore ways to integrate P2 into their core business practices.

Participants can enter the program and be recognized at one of three levels—Commitment, Achievement, or Excellence. The levels are designed to engage businesses at all stages of environmental management system implementation and to encourage progressively higher system development. The goal of the EPRP is to encourage organizations to improve their environmental programs over time.

The program assembled the panel and moderated a breakout session at the 2003

Continued on next page
Strategies for a Sustainable Oklahoma conference. The session was entitled “Sustainable Business Practices make Economic Sense.” The session was designed to showcase Oklahoma facilities that had made the move to incorporating Environmental Management Systems (EMSs) and pollution prevention into business decisions.

The progression is clear. The Pollution Prevention Program and partners assist participants in moving from awareness to project implementation to a strong, ongoing system to assure measured continuous environmental improvement.

DEQ HOSTED AN ENGINEER’S SEMINAR

DEQ Water Quality Division hosted an Engineer’s Seminar on November 7, 2002, in DEQ’s first floor multi-purpose room. The purpose of the seminar was to provide in-state training to update engineers on new EPA rules. An added bonus of the seminar was that it provided an opportunity for engineers to earn several hours of continuing education, which is now required by state law.

Presentations from the Municipal and Industrial Enforcement, Public Water Supply and Construction Permitting sections provided the audience with valuable information. Patty Thompson, P.E., explained the history and purpose of FACT (Funding Agency Coordinating Team) and procedures for the engineering and environmental review process. Additionally, Professional Engineers Wayne Craney, Patrick Rosch and Ward Conaway informed the audience where to find DEQ’s design standards when submitting engineering reports, how to apply them to specific wastewater engineering projects and some common problems. Kay Coffey, PhD, P.E., section manager for Public Water Supply, provided a detailed explanation of the information required in a water supply engineering project report. Robert Mullins, P.E. and Rebecca Poole, P.E., presented a summary of the Long-Term Enhanced Surface Water Treatment Rule and Disinfection Profiling from the perspective of both compliance and enforcement points of view. Ms. Poole continued with a discussion of drinking water treatment by explaining the Disinfectants/Disinfection By-products rule.

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The 125 attendees included FACT agency personnel, consulting engineers, city personnel from throughout Oklahoma and DEQ employees. A total of 109 PEs received up to six professional development hours as defined by the Oklahoma Board of Registration for Professional Engineers and Land Surveyors. The Engineer’s Seminar was a great success and answered many questions for all.

Mike Harrell and others address attendees during engineering seminar.

Rebecca Poole explains regulation during the engineering seminar.

Classroom members take notes on engineering reports.

Attendees register for Engineer’s Training.
PORTABLE ENGINE ANALYZER GUIDANCE

One of the most important aspects of Air Quality permitting is the determination of reliable methods to certify the amount of emissions coming from the many different types of equipment used in industry. In most cases, the equipment has stacks that are the emission points and the Environmental Protection Agency (EPA) has standardized methods for the determining emissions from these stacks. In Oklahoma, natural gas compressor stations constitute the majority type of Air Quality Division (AQD) permitted facilities. These stations are unmanned, are located mostly in remote areas of the state and are subject to frequent alterations because product demand and availability fluctuates. All these factors combine to make certification of emissions very difficult to obtain. Therefore, the use of portable engine analyzers has been an important part of the certification process. However, the widespread use of these analyzers to test many different types of engines at many different locations and under many different operating scenarios made it necessary to develop a standardized procedure for the testing in order to insure consistent and reliable results from all operators.

During this past year a work group consisting of AQD technical staff, industry representatives and manufacturer representatives developed a guidance document that is now available that will standardize the use of these portable engine analyzers. Operators must either use this guidance or apply for and have AQD approve an alternate equivalent procedure. The results of this effort will insure consistent use of the analyzers among the operators, provide more accurate emissions calculations from these facilities and allow the AQD compliance and enforcement staff to reliably audit the largest class of facilities permitted in Oklahoma.

SMALL WATER SYSTEM OPERATION AND MAINTENANCE MANUAL

The Water Quality Division recently completed and began distribution of the revised Small Water System Operation and Maintenance Manual. This manual is designed as a plain language reference document for small and extremely small water systems and it addresses many of the recent changes in drinking water regulations that affect these size systems. Small water systems, by federal definition, serve populations of 10,000 or less. “Extremely small” is not federally defined, but refers to very small businesses such as schools, day care centers, convenience stores, small resorts, small trailer parks, etc.

The manual covers operator certification requirements, drinking water standards, operational testing methods, water system maintenance, terminology, calculations and commonly used formulas. Information is provided in a non-technical format so that water system operators with minimal training and experience can stay in compliance with drinking water regulations. Because such a diverse range of operators manage small systems, information is presented in a very user-friendly manner. Copies of the manual are available at no charge from the Public Water Supply District Engineers or from the Operator Certification Section.
ON-LINE EXAMS: A NEW WAY TO TEST

In September of 2002, the Operator Certification Program began its transition into the Internet Age. The program was the first in the nation to provide on-line exams to Operators. The first official on-line operator certification exam was given September 5, 2002. Since then, the on-line examinations have become very popular and have grown to become a major part of the Operator Certification Testing Program.

Before exams went on-line, two to three written exams were given each month at standard locations around the state, to about 30-120 students per site. Many students would have to drive long distances to get from a training class to a separate exam location, or they would have to wait months after attending training classes for the exam to be given in their area.

Now, with the mobility of on-line exams, an average of three on-line exams are given each week. Operator Certification offers on-line exams in conjunction with most standard training classes. After the students complete the standard training course, the instructor allows them to use their computers, go with the instructor to a nearby computer facility, or in some cases use laptops provided by the instructors. Each student gets a password and the instructor proctors the exam. When the exam is completed, the student’s test score is displayed on the computer screen and he/she is able to print the test results as confirmation. At written exams, however, students have to wait three weeks to receive their scores by mail.

With all of the benefits of taking the on-line exams, the attendance at these exams is increasing exponentially. In turn, the attendance at the written exams is decreasing significantly.

Although it already is among the top in the nation, Operator Certification continually strives to improve its program while other states work hard to follow this lead. ★
DEQ Hosts National Conference for Emergency Preparedness

DEQ hosted the 2003 Annual Conference of the National Association of SARA Title Three Program Officials (NASTTPO). NASTTPO is an organization of federal, state, tribal and industry officials involved with chemical emergency preparedness and planning. Over 150 people from across the country attended the 4-day event held during April in downtown Oklahoma City. DEQ staff not only planned and coordinated the meeting, but also gave several presentations.

Headquarters personnel from the Environmental Protection Agency, Department of Transportation, Federal Emergency Management Agency, Federal Bureau of Investigation and Occupational Safety and Health Administration gave program updates at the conference opening session. Presentations covering water supply vulnerability analysis, emergency planning for individuals with disabilities, lessons learned from a bioterrorism exercise, cyber terrorism and an overview of the Memorial Institute for the Prevention of Terrorism were included in this portion of the program. Training resources and grant opportunities were also included in the conference program. Presentations on storm ready communities and training for meth lab response rounded out the program. New this year was a Share Fair in which materials developed by states and tribes were displayed.

The conference provided a much-needed opportunity for emergency planners from around the country to meet and discuss problems as well as share solutions. The process of preparing and planning for emergencies continues to be one of the primary challenges facing the United States. DEQ’s efforts in bringing such an outstanding agenda and networking opportunity to Oklahoma provided benefits to citizens around the state and across the country.
DEQ PROVIDES TRAINING AND OUTREACH TO LOCAL EMERGENCY PLANNERS

DEQ’s Customer Assistance staff continues to support Oklahoma Local Emergency Planning Committees (LEPC) by regularly attending LEPC meetings and by offering a wide range of assistance programs. This past year, DEQ and county LEPCs joined together on a variety of outreach projects to the regulated community, emergency planners and first responders. Some of those joint projects were County-Wide Hazard Analyses, Tier 2 Submit software training, Toxic Release Inventory reporting workshops, individual county Tier 2 Report audits, emergency response and planning exercises and Computer-Aided Management of Emergency Operations (CAMEO) software training.

One of the more popular DEQ assistance programs is the CAMEO training. CAMEO is a suite of software applications specifically designed for emergency planning and response activities. CAMEO applications include a Chemical Library containing information on more than 6,000 substances, an air dispersion model to predict downwind concentrations of chemical releases and a mapping software which displays the air model’s predicted area on local maps. LEPC representatives from 34 counties attended at least one of the 3-day training courses conducted by DEQ last year.

DEQ anticipates continuing all these LEPC assistance programs for next year. The Tier 2 Submit software training will be expanded and technical assistance and training on successfully applying for EPA grant programs will be offered to LEPCs. All of these activities help protect Oklahoma citizens by enhancing the capabilities and resources of their local emergency planners and responders.