



ASSE Energy Corridor Section Newsletter

June 2016

Volume 1, Number 4

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Links:

[ASSE Energy Corridor Section](http://gulfcoast.asse.org/energy-corridor-events/)
<http://gulfcoast.asse.org/energy-corridor-events/>

[ASSE Gulf Coast Chapter](http://gulfcoast.asse.org)
<http://gulfcoast.asse.org>

[ASSE](http://www.asse.org)
<http://www.asse.org>

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Current Events

Welcome to the June 2016 edition of the ASSE Energy Corridor Section Newsletter! We're very excited about our growing Section and the meetings, events and speakers we have coming up for you in the coming months!



July 14, 2016 Meeting

Guest Speaker: Shawn Galloway, President of the global consultancy, ProAct Safety, and coauthor of several bestselling books

Topic: From Theory to Practice: The Strategy of Safety Culture Excellence. SM

Bring a Friend Raffle

COME ONE, COME ALL!! We want to greet our prestigious guest speaker, Shawn Galloway, with an awe-inspiring Energy Corridor Texas welcome, so we are revving up this month's meeting with our very 1st "Bring a Friend Raffle".

RULES:

1. Everyone who attends this month's meeting will receive 1 raffle ticket.
 2. You will receive 3 additional tickers for every friend* you bring.
 3. Every friend* you bring will receive 2 additional tickets.
 4. Additional tickets will be handed out during the introductions.
 5. Winning tickets will be drawn at the end of the meeting.
- * A "friend" is any non-Energy Corridor Section member invited/brought by an ASSE member.

If you are interested in donating prizes please contact
Paul Crook @ vicechair@energycorridor.asse.org

As always, we appreciate and look forward to your feedback, input and engagement. If you have any suggestions or recommendations that you'd like to see in our newsletter or at our meetings, please feel free to let us know. Our aim is to ensure our Section is as value-added as possible to you. Please let us know your thoughts!

Thank you for your dedication to safety!
Your ASSE Energy Corridor Section Team

Get Involved!

- Are you a speaker?
- Are you a writer?
- Have an idea for the Section?
- Have a topic you'd like to see Addressed?
- Have something to share?

Let us know!

- Please get in touch using our contact information above to let us know your thoughts. We'd love to hear from you!

Upcoming Events...

Gulf Coast ASSE and AIHA Joint Social Event

- Fun, food, door prizes and will surely be lively conversation!
 - July 14, 2016 from 4:30 – 7:30
 - Cadillac Bar - 1802 Shepherd Drive, Houston, TX 77007
-

ASSE Region 3 PDC

- August 28, 2016 - August 31, 2016
 - San Antonio, TX - Grand Hyatt San Antonio
 - [Registration Information](#)
-

NSC Congress and Expo

- October 15-21 (Expo 10/17-10/19)
 - Anaheim, CA - Anaheim Convention Center
 - [Registration Information](#)
-

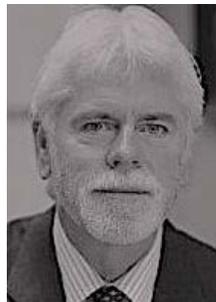
Reminder: We're Moving!

- What: The ASSE Energy Corridor Section Meetings
- When: January 12, 2017
- Where: Spring Creek BBQ – 21000 Katy Fwy; Katy, TX 77449
- [Registration Information](#)

Last Month.....

We had a great amount of members, visitors and guests in June and are looking forward to seeing everyone again in July! Please spread the word to your friends and colleagues that we'd love to see them!

June's Technical Topic:



"Lessons NOT Learned: Methyl Mercaptan Release at the DuPont LaPorte, TX Plant on November 14, 2015."

Doug Rush, CIH, CSP, CHMM

On June 9, 2016, the ASSE Energy Corridor Section hosted Doug Rush, CIH, CSP, CHMM to discuss the tragic Methyl Mercaptan release at the LaPorte DuPont plant in November of 2014.

Doug's presentation covered a wealth of information on the hazardous materials, regulatory issues, response mechanisms and cultural issues involved in the incident. His presentation is available [here](#).

We thank Doug for his very important presentation and encourage everyone to review it or even take a second look at it.

Inclement Weather

With the continuing inclement weather situation in Houston and surrounding areas, the City of Houston has developed an Emergency Information Center available online.

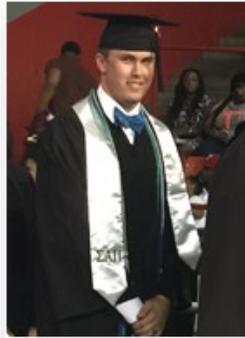
This online resource contains important information on storm notifications, information, news and recovery information.

The City of Houston Emergency Information Center is located [here](#).

A Special Announcement!

We're proud to announce that one of our Section's student members is no longer a student!

Robert Segelquist graduated on May 15 from University of Houston - Clear Lake with a BS in Environmental Science with dual concentrations, Safety & Industrial Hygiene!



Earlier in his career, Robert earned his Eagle Scout and an AAS in Emergency Medicine, and has spent the last five years as a volunteer Medic and Firefighter in his hometown. Having completed his GSP, he is pursuing a position related to both Safety and Industrial Hygiene intending to complete both his CSP & CIH in the next several years.

Congratulations, Robert!

In the News...



Final Rule to Improve Tracking of Workplace Injuries and Illnesses

Under a final rule new requirements take effect August 10, 2016, which become effective January 1, 2017, OSHA will revise its requirements for recording and submitting records of workplace injuries and illnesses to require that some of this recorded information be submitted to OSHA electronically for posting to the OSHA website.

We are taking information that employers are already required to collect and using these data to help keep workers safer and make employers, the public, and the government better informed about workplace hazards. Releasing the data in standard, open formats will:

- Encourage employers to increase their efforts to prevent worker injuries and illnesses, and, compelled by their competitive spirit, to race to the top in terms of worker safety; and

- Enable researchers to examine these data in innovative ways that may help employers make their workplaces safer and healthier and may also help to identify new workplace safety hazards before they become widespread.

In addition, the final rule includes provisions that encourage workers to report work-related injuries or illnesses to their employers and prohibit employers from retaliating against workers for making those reports.

OSHA expects this new rule will help improve workplace safety through expanded access to timely, establishment-specific injury and illness information for OSHA, employers, employees, employee representatives, potential employees, customers, potential customers, and public health researchers.

The rule will also provide OSHA with data to assist the agency in improving allocation of compliance assistance — help OSHA provide to employers who want to improve their safety standards — and enforcement resources, expanding the Agency's ability to identify, target and remove safety and health hazards, thereby preventing workplace injuries, illnesses and deaths. It will also enable OSHA to conduct more rigorous evaluations of the impact of government injury prevention activities.

In addition, behavioral science suggests that public disclosure of the data will “nudge” employers to reduce work-related injuries and illnesses in order to demonstrate to investors, job seekers, customers, and the broader public that their workplaces provide safe and healthy work environments for their employees. Currently, employers cannot compare their injury experience with other businesses in their industry; they can only compare their experience with their industry as a whole. Access to establishment-specific data will enable employers to benchmark their safety and health performance against industry leaders, encouraging them to improve their safety programs.

Finally, public access to very large sets of workplace injury and illness data will provide public health researchers with unprecedented opportunities to advance the fields of injury and illness causation and prevention research.

Electronic Submission Requirements

The final rule requires certain employers to electronically submit the injury and illness information they are already required to keep under existing OSHA regulations.

The requirement applies to the following:

- Establishments with 250 or more employees that are currently required as per the North American Industry Classification System (<http://www.census.gov/eos/www/naics/>) unless you are industry exempt as per following table (<https://www.osha.gov/recordkeeping/ppt1/RK1exempttable.html>) to keep OSHA injury and illness records must electronically submit information from OSHA Forms 300 — *Log of Work-Related Injuries and Illnesses*, 300A — *Summary of Work-Related Injuries and Illnesses*, and 301 — *Injury and Illness Incident Report*.
- Establishments with 20-249 employees that are classified in certain industries with historically high rates of occupational injuries and

illnesses must electronically submit information from OSHA Form 300A. (<https://www.osha.gov/recordkeeping/NAICScodesforelectronicsubmission.pdf>)

The electronic submission requirements do not change an employer's obligation to complete and retain injury and illness records.

Data submission from OSHA Forms 300 — *Log of Work-Related Injuries and Illnesses*, 300A — *Summary of Work-Related Injuries and Illnesses*, and 301 — *Injury and Illness Incident Report* for these establishments will be phased in as follows:

Submission year	Establishments with 250 or more employees	Establishments with 20-249 employees	Submission deadline
2017	Form 300A	Form 300A	July 1, 2017
2018	Forms 300A, 300, 301	Form 300A	July 1, 2018

Beginning in 2019, the submission deadline will be changed from July 1st to March 2nd.

OSHA will post the establishment-specific injury and illness data it collects under this recordkeeping rule on its public Web site (www.osha.gov). OSHA will remove any Personally Identifiable Information (PII) before the data are released to the public.

The final rule retains the provision that allows OSHA to collect information from employers that do not submit the information to the Agency on a routine basis. These employers would only be required to submit the data requested upon written notification from OSHA or OSHA's designee.

States that operate their own job safety and health programs, also called OSHA State Plan states, must adopt requirements that are substantially identical to the requirements in this rule within six months after publication of the final rule.

Employees' Right to Report Free from Retaliation

These data will only be accurate if employees feel free to report injuries and illnesses without fear of retaliation. The rule therefore also contains three provisions to promote complete and accurate reporting of work-related injuries and illnesses.

- Employers must inform employees of their right to report work-related injuries and illnesses free from retaliation. This obligation may be met by posting the OSHA *Job Safety and Health - It's The Law* worker rights poster from April 2015 or later (www.osha.gov/Publications/poster.html).
- An employer's procedure for reporting work-related injuries and illnesses must be reasonable and must not deter or discourage employees from reporting.
- Employer may not retaliate against employees for reporting work-related injuries or illnesses.

Workers' Rights

Workers have the right to:

- Working conditions that do not pose a risk of serious harm.
- Receive information and training (in a language and vocabulary the worker understands) about workplace hazards, methods to prevent them, and the OSHA standards that apply to their workplace. Review records of work-related injuries and illnesses.
- File a complaint asking OSHA to inspect their workplace if they believe there is a serious hazard or that their employer is not following OSHA's rules. OSHA will keep all identities confidential.
- Exercise their rights under the law without retaliation, including reporting an injury or raising health and safety concerns with their employer or OSHA. If a worker has been retaliated against for using their rights, they must file a complaint with OSHA as soon as possible, but no later than 30 days.



Safety Perspectives

No Quick Fix: Safety cannot be Reverse Engineered

Cory Worden, M.S., CSHM, CSP, CHSP, ARM, REM, CESCO

In one of my previous lives, I was an instructor at the U.S. Air Force Emergency Management School. At the same time, my wife taught second grade students at the local elementary school. We used to marvel – and laugh – and how similar some of our students were in terms of looking for seemingly quick ways to finish their work, pass their tests and avoid really bearing down and studying hard. Like any group, we both had high achievers – those who would intently focus during class, study at night and deliberately excel on every assignment – low achievers – those who wouldn't try at all – and everything in between, including those with a '7-0, good to go' mentality (70% was the passing score on exams during the course).

A Lack of Effort

In my wife's classes, the second graders who didn't want to study or work hard during class would usually attempt to complete their assignments in as little time as possible so they could get back to not working, even if it meant getting the answers wrong. If the assignment was homework, these students would usually just not do it at all. In either case, these students would usually find themselves in danger of failing at some point during the school year, an issue easily rectified in most cases by simply doing their work. However, even knowing this, many would still wait until they were danger of failing before actually doing anything about the problem. In the case of my Air Force students, the same issue usually existed with those who chose not to study or work hard. They would try to sleep during class, not attend study sessions, not study in their rooms at night and would simply hope to pass their exams on whatever knowledge they had and luck. In many of these cases, these students would find themselves with a failing exam or field demonstration grade (each of which could fail them out of the school) at some point during the 3 ½ month course. When this happened, the failing student's performance record would be evaluated by the instructor staff and leadership to determine if the student would be allowed to re-test, if the student would be 'recycled'

back through the course block he or she failed, or if he or she would simply be removed from the course altogether and either send to a different school or send home from the Air Force altogether. Needless to say, for anyone wanting to remain in the Air Force, he or she would need to prove there was a reason for the instructor team to allow a retest or recycle. If the student didn't show any effort during class, didn't attend study sessions and, overall, didn't show any interest in even trying to pass, there would be no reason to allow him or her a second chance to pass.

No Quick Fix

With these heightened stakes, many students who didn't pass their exams would try to find a way to invalidate test questions or otherwise make up enough points to barely pass their otherwise failed test. For example, if a student made a 68% on an exam requiring a 70% to pass, that student might 'challenge' a test question by claiming invalidity so that he or she could get the two points necessary to pass. Usually, the claim was that, 'If that invalid test question was thrown out, I would have passed.' In reality, it wasn't the one test question that made the student fail – that is, if the question was even invalid to begin with – but instead the other 15 questions he or she marked incorrectly. Had the student studied and done his or her diligence, the one question now being claimed to be invalid wouldn't have made a difference. Instead, the student was attempting to reverse engineer his or her grade, to try to pass the exam by scrounging enough points on the back end to pass.

In another example, for those students who were granted an opportunity to retest, many of them would request a review of their failed exam. During these reviews, some of these students would only show interest in the specific questions they missed. With this, instead of studying the concepts on the exam and seeking a better understanding of all of the material on the exam, these students were hoping that they could simply make up the questions they missed to bring their score up to a passing grade. There were/are a number of issues with this idea; for example, doing this, the student doesn't actually gain a better understanding of the testable material. Instead, he or she only learns a handful of specific questions in an effort to barely pass the second try at the exam. Additionally, this concept only works if the test remains the same. If any questions change on the second attempt, there's a significant chance the student will again fail. The only way to become successful in a legitimate, valid and reliable way is to study, learn the concepts and gain a broad understanding of the testable material.

With all of this said, what does this have to do with safety? Safety, like schoolwork and tests, cannot be reverse engineered.

No Safety Management, No Validity or Reliability

Many organizations track lagging indicators in safety to supposedly determine progress. They set targets for their recordable rates, DART rates or other indicators and then report them on a recurring basis, often using spreadsheets and colorful boxes to illustrate 'good' and 'bad' rates. However, many organizations will not, even while tracking lagging indicators, have a definite safety management process. Ultimately, without a complete package - hazard analysis, hazard

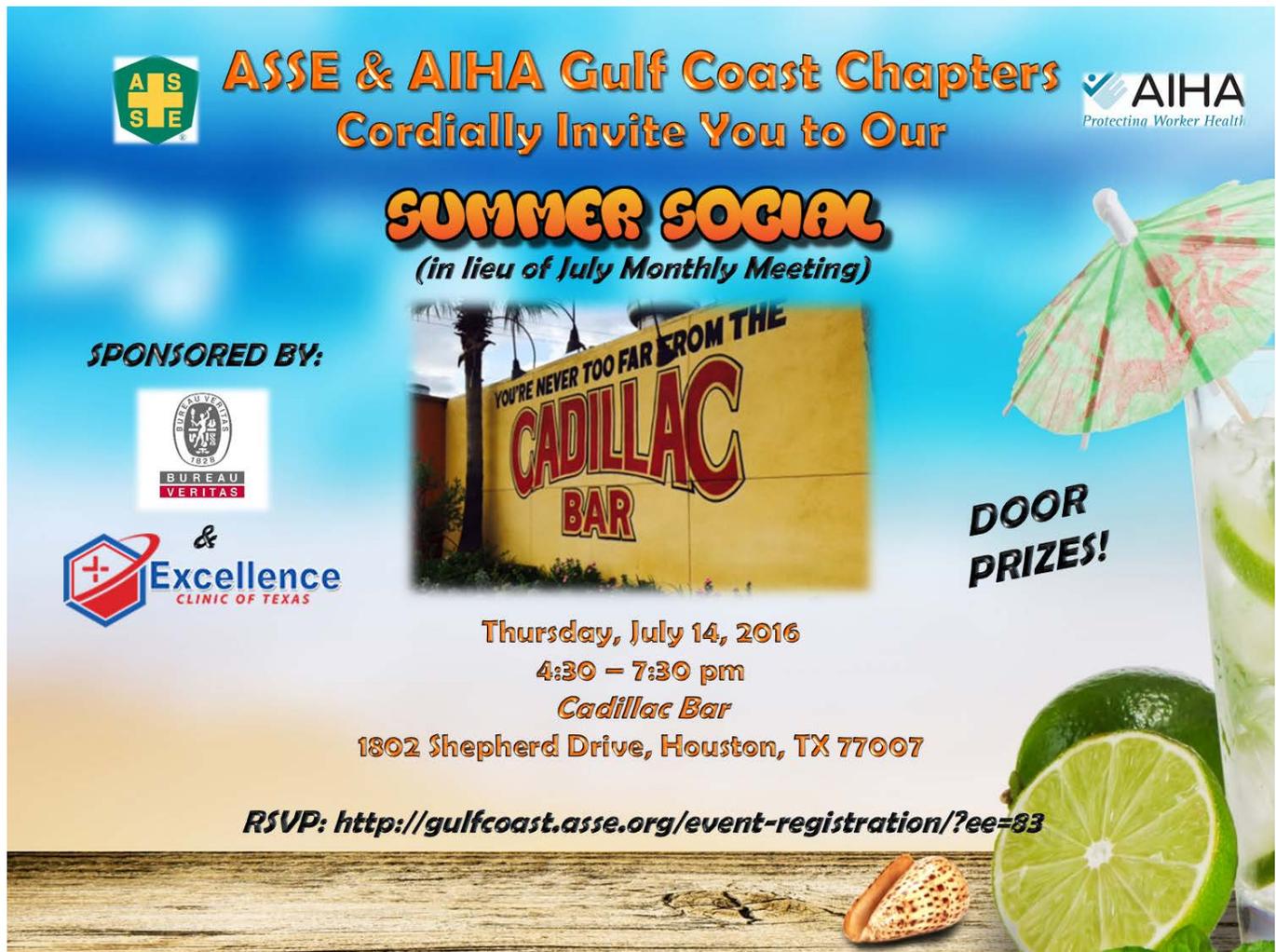
controls, an information/communication program, leading indicators to validate hazard control use and target unsafe behaviors and conditions, lagging indicators to track progress after validating hazard control use and investigations to follow up on incidents and ensure preventative and corrective measures – trying to affect lagging indicators is like trying to pass a test without ever studying. I've seen many organizations pontificate and argue about why their incident rates are what they are but do so without even having analyzed hazards or implemented hazard controls. I've seen organizations argue about why employees were injured but without having ever trained those employees on hazard control use. I've seen some organizations argue about why employees were working unsafely without ever having implemented a hazard control for the process that injured the employees. Ultimately, without a safety management program, even talking about lagging indicators is a moot point. Like trying to pass a test without making an effort in class or studying, trying to affect incident rates without a safety management program is a lost cause. Furthermore, should a question of the organization's diligence come up (as in a deposition or otherwise uncomfortable situation), it's almost impossible to defend a bad lagging indicator without a safety management program to show an effort. Safety cannot be reverse engineered.

Investigations are Only a Part of the Program

I've had some organizations with heightened incident rates ask me for recommendations on how to improve their safety culture. After conferring with them on the need for a hazard analysis, hazard controls, an information program, leading indicators, lagging indicators and investigations, several of these organizations have attempted to forego a full-circle program and simply investigate the most recent incidents that occurred within their organization. In short, instead of trying to truly understand safety by thoroughly identifying, assessing and controlling the hazards in their processes, these organizations were attempting to only identify and correct single unsafe conditions or behaviors – after the incident had occurred. For example, if an employee was injured by not using a hazard control, their intended course of action was to call that employee into a meeting and write up a performance improvement plan. While this is a valid course of action as part of a safety management plan (when applicable), my recommendation to them was to determine what the employee was doing, what hazard control was needed, how to communicate that hazard control expectation to the team and how to validate that all employees are using that hazard control. This, in turn, would allow for safe behaviors and conditions across the whole team instead of simply calling out one employee and hoping that one employee wouldn't repeat the behavior that he or she was injured while doing, all the while the other employees are still possibly working unsafely. This is exactly like trying to pass an exam on the second try while only studying the missed questions. This doesn't provide an understanding of the whole situation; it only allows for a few specific examples. Furthermore, there's a significant, if not absolute chance that the next incident will be totally different than the last. By only investigating specific incidents, in a best-case scenario, this prevents a few specific incidents from being repeated. It does not, however, create continual improvement in hazard identification, assessment and control. Again, safety cannot be reverse engineered.

Don't Get Stuck in the Past

It's unfortunate when organizations get stuck in the past and only focus on lagging indicators. Lagging indicators are simply rates of injuries that have already happened. If we know how and why these incidents occurred, we can transfer this knowledge into our continual hazard analysis, improve our hazard controls, communicate them and begin to validate their use. With this, we can work towards continually improving safe behaviors and conditions instead of arguing and pontificating over lagging indicators. I've seen many organizations stuck in the rut of trying to make lagging indicators look better by arguing about incident culpability or recordability, all the while without a safety management program to even show due diligence in hazard control. I've seen organizations try to improve safety by only following up on specific incidents as if preventing repeats of those exact scenarios will allow for safe behaviors and conditions without ever identifying, assessing and control hazards. Safety cannot be reverse engineered. It has to be a proactive effort stemming from the organization's leadership and integrated into the whole team's processes and culture. Otherwise, trying to change a safety culture is just like trying to pass a test without studying; we have to put in the hard work up front to make positive results. It can't be done after the fact.



ASSE & AIHA Gulf Coast Chapters
Cordially Invite You to Our

SUMMER SOCIAL
(in lieu of July Monthly Meeting)

SPONSORED BY:

 
 & 

  **DOOR PRIZES!**

Thursday, July 14, 2016
4:30 – 7:30 pm
Cadillac Bar
1802 Shepherd Drive, Houston, TX 77007

RSVP: <http://gulfcoast.asse.org/event-registration/?ee=83>

