

CHEMICAL EMERGENCY PREVENTION & PLANNING BULLETIN



June 2014

CHEMICAL EMERGENCY PREVENTION & PLANNING

BULLETIN

US EPA Region 10
1200 6th Avenue, Suite 900
Seattle, Washington 98101

206.553.1255
Fax: 206.553.0124

[R10 RMP Webpage](#)

Bulletin Contacts:

For **RMP**: Javier Morales
morales.javier@epa.gov

Editor: Peter Phillips
phillips.peter@epa.gov

Co-Editor: Terry Garcia
garcia.terry@epa.gov

For **SPCC/FRP**: AK: Matt Carr
carr.matthew@epa.gov

WA OR ID: Michael Sibley
sibley.michael@epa.gov

For **EPCRA**: Suzanne Powers
powers.suzanne@epa.gov

For a free **Subscription**:

<http://yosemite.epa.gov/R10/airpage.nsf/enforcement/cepp-news>



REPORT

CHEMICAL OR OIL SPILLS
NATIONAL RESPONSE CENTER

1-800-424-8802

Editor's Note: The goal of part 68 — the Risk Management Program — is to prevent accidental releases of substances that can cause serious harm to the public and the environment from short-term exposures and to mitigate the severity of releases that do occur. This article focuses on the importance of establishing a sound safety culture.

Renovating Your Safety Culture

By Robert Pater

Many people, including my family, are drawn to the current slate of home renovation television shows. It's fascinating to watch a shabby or dated house be transformed into an almost unrecognizably upgraded, efficient home. Of course, this occurs only with the right combination of planning, resources, and work.

There are lessons here for strategic leaders interested in taking their "home" organization's safety performance and culture to another level. Unless leaders are building a house--or company--from scratch, any change they institute has to start with what they have. In the contracting trades, this could be a structure with insufficient support to bear the weight of desired additions or changes, creeping mold or rot, lack of insulation from outside elements, potentially dangerous electrical energy system, crumbling foundation, and more. A pretty parallel list for company leaders attempting to transform their organization's performance from mediocre to modern, from leaking energy and opportunities to standing sterling and efficient. So here are seven organizational renovation keys:

1. *Uncover to discover.* Typically, like a contractor, leaders don't know what they have to contend with until uncovering veneer or walls, behavioral or bureaucratic patterns. Better to find out about lurking issues as early as possible in order to make needed corrections. Best not to install new framing over a shaky foundation. Similarly, before expanding organizational operations into other geographical areas, it's essential to first clean up any safety and other issue that might otherwise spread insidiously to new sites. One North American-wide company was planning on significantly expanding operations. My advice? Fix safety and other systemic problems before seeding; better to mend problems at earliest possible stage--prior to adding on--just as blowing up a balloon will put more pressure on existing flaws.

Sometimes discovery is best accomplished with experts. But in companies, this includes those in the first line of expertise with operating and safety issues: line employees and front-line supervisors. They see and live with potential safety issues every day and likely know about lurking problems.

2. *Work from the inside out.* The most important changes you make won't be immediately visible. But you've got to fix the bones of a house before finishing carpentry and cosmetics. The bones of safety go beyond policies and procedures; they reside as much in everyone's mindset toward taking personal control of safety, not relying on professionals or others to keep them safe.

Also, do what you can to convince the doubters and resisters. People often hold onto current structures and processes, even when these are suboptimal. Not everyone is able to

envision the future restructuring you've planned. As do TV remodeling contractors, make it easy for them to see the personal benefits of planned changes and continue to convey your conviction that things will improve.

3. *Build in contingencies.* Something unexpected is sure to come up when remodeling older houses or existing organizations, whether you're putting in an addition or removing what hasn't been working. Wise leaders watch for indications of unexpected problems at the earliest levels, then make adjustments quickly. As Will Rogers said, "Planning gets you into things; hard work gets you out of them." Drafting great plans is important; regrouping and recovering from setbacks is perhaps even more so.

Also, think of mental contingencies. People become dispirited or disillusioned when their expectations aren't met, so leave some expectational leeway in communicating new plans.

4. *Allocate resources to priorities.* Weigh what improvements are likely to get the best results given limited resources and time. Avoid merely cosmetic changes that are like putting a fresh coat of paint on a crumbling support wall. In that vein, avoid reorganizing just for the sake of shaking people up (as one energy company has been known to do). Similarly, don't just rename processes or departments (or now label employees "associates") when there's really no substantive change in organization or employee relations. At best, this will lose leadership credibility.
5. *Plan for "flow."* Many homeowners gravitate toward an "open concept" floor plan. Similarly, many employees want communications as open as possible. Yet many managers restrict this, holding back information as if their bonuses rode on this. Share as much information as possible, especially where it affects workers' job security.
6. *Ask what the celebrity designer in one show inquires of homeowner clients: "What do I have to do so you'll love it?"* This question could apply as well to employee engagement. Even if you're not posing this directly, ponder: "What would boost worker satisfaction and performance?" Many feel most committed when engaged in work they see as meaningful and fits with the company's way of doing business, when they have the right level of helpful challenge and feel fairly treated.

When it comes to remodeling houses or reenergizing workers, it's not just how much money is allocated, but also how it's spent. Have you seen seemingly unlimited resources poured into a home remodel that came out hideously? Similarly, expensive incentive systems can actually create employee opt-out. Be sure to incent without incensing.

7. *Create a workable timeline for change.* Report on progress to everyone. Transformation doesn't have to take interminably long. Dramatic improvements in safety performance and culture can occur in less than six months. Ironically, in the best turnarounds, change can feel quite slow in the beginning phases (getting materials delivered, assembling buy-in, etc.) It's usually when looking back that people marvel about how quickly positive changes occur.

As catalysts of change, best leaders are continually upgrading and remodeling their company, crafting new structures and environments from tired or worn out starting points. A strategic renovation approach can help them build safety performance and culture to eye-popping levels.

About the Author

Robert Pater is Managing Director of Strategic Safety Associates and MoveSMART®. To contact him, email rpater@movesmart.com.

Where Do I Go For More Information?

RMP Materials EPA's Web site: <http://yosemite.epa.gov/R10/airpage.nsf/Enforcement/rmp> includes the Risk Management Program rule, Off-Site Consequence Analysis specific guidance and calculator, the list of regulated substances, fact sheets, guidance documents, industry-specific model plans, FAQs, the RMP*eSubmit Users' Manual, and other information.

EPA RMP Region 10

RMP Coordinator: Javier Morales 206-553-1255

EPA Region 10 RMP Website: <http://yosemite.epa.gov/R10/airpage.nsf/Enforcement/rmp>

Superfund, TRI, EPCRA, RMP & Oil Information Center - The information center can also answer questions related to Clean Air Act Section 112(r) and RMP reporting requirements. Contact the RCRA, Superfund, and EPCRA Call Center for your policy, regulatory compliance, and reporting requirements questions.

Call 800-424-9346 Toll Free or TDD 800-553-7672 Monday – Thursday: 10:00 AM – 3:00 PM Eastern Time Extended Hours of Operation (May, June and July): Monday – Friday: 9:00 AM – 5:00 PM Eastern Time (Closed Federal Holidays) <http://www.epa.gov/superfund/contacts/infocenter>

RMP*eSubmit Software Support - Contact the RMP Reporting Center for specific software questions about RMP*eSubmit. (703) 227-7650 (phone) Monday – Friday: 8:00 a.m. – 4:30 PM ET. Closed Federal Holidays. RMPRC@epacdx.net

LISTSERVS - EPA maintains numerous listservs to keep the public, state and local officials, and industry up to date, including several that pertain to emergency management. You can sign up for our [listserv](https://lists.epa.gov/read/all_forums/subscribe?name=callcenter_oswer) to receive periodic updates: https://lists.epa.gov/read/all_forums/subscribe?name=callcenter_oswer

This bulletin provides information on the EPA Risk Management Program, EPCRA, SPCC/FRP and other issues relating to Accidental Release Prevention Requirements. The articles contained herein are provided for general purposes only. EPA does not accept responsibility for any errors or omissions or results of any actions based upon this information. Please consult the applicable regulations when determining compliance. Mention of trade names, products, or services does not convey, and should not be interpreted as conveying official EPA approval, endorsement, or recommendation. The information should be used as a reference tool, not as a definitive source of compliance information. Compliance regulations are published in 40 CFR Part 68 for CAA Section 112(r) Risk Management Program,