

AGENDA  
MEETING OF THE MCA BOARD OF DIRECTORS  
10:00 a.m., Tuesday, October 9, 1973  
The Madison, Washington, D. C.

- I. Opening Remarks and Introduction of Guests
- II. Minutes of Meeting of September 11, 1973, Including  
Financial Statement for Three Months Ended August 31, 1973
- III. Business Items:
  - (a) Establishment of the Office of the Chemical Industry  
Trade Advisor and Appropriation of \$70,000 for  
Funding (Attachment)
  - (b) Proposed Revision of Rules of Organization and  
Procedure for Water Resources Committee (Attachment)
  - (c) Proposed Rules of Organization and Procedure  
for Public Relations Committee (Attachment)
  - (d) December Meetings of Board of Directors and  
Executive Committee
- IV. Report of the Director of Government Relations
- V. Reports of Committees:
  - (a) Government Relations Committee  
Charles T. Marck, Chairman
  - (b) Occupational Health Committee  
Kenneth S. Lane, M. D., Chairman
  - (c) Safety and Fire Protection Committee  
John Jorgensen, Chairman
- VI. Report of the President

CMA 070190

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Next Meeting of the Board of Directors will be held at 3:00 p.m., Monday  
November 19, 1973, at the Pinnacle Club (Rooms A, B, and C), located on  
the top floor of the Mobil Building, 150 East 42nd Street, New York City

REPORT TO THE BOARD OF DIRECTORS OF MCA ON THE ACTIVITIES  
OF THE SAFETY AND FIRE PROTECTION COMMITTEE

John Jorgensen, Chairman

October 9, 1973

The Safety and Fire Protection Committee has two purposes, (1) to advise the Board of Directors concerning Safety and Fire Protection in Chemical Manufacturing, and (2) to develop programs to assist producers, handlers and users of chemicals in preventing physical injuries, fires and other accidental losses.

Based on safety performance, we have failed on both counts. Based upon safety and fire protection material developed by the Committee, we have done well. But, actually, we have failed anyway. Let's look at the record. Please refer to your charts.

SAFETY PERFORMANCE MCA REPORTING COMPANIES

FREQUENCY RATE

<u>No. of Employees</u>	<u>1963</u>	<u>1972</u>
1-250	13.99	22.28
250-1000	8.25	11.18
1000-2500	6.39	8.09
2500-5000	3.84	5.03
Over 5000	2.28	2.71
MCA Total	2.98	3.62

In NO category do we show improvement! Yet, when we look at costs, processes, products and yields over the past 10 years, we see continued improvements. Then WHY the deterioration of safety performance? We may do well to consider that we have been concentrating on equipment, material, systems, procedures and practices, rather than the MAN who does the work. HE is the one who has the accidents! HE is the one violating procedures. Despite our valiant efforts in publishing Chemical Safety Data Sheets, Safety Guides, Chem-Cards, Laboratory Safety Manuals, Accident Case Histories, Risk Analysis, Inspection Techniques, conducting Workshops, working with OSHA and applying its standards, HE is still committing the unsafe act. WHY? We really don't know why -- and not too much has been done to learn the answers.

That is the bad news. Let me give you some good news.

Your Safety and Fire Protection Committee is a profit center. The past fiscal year we sold \$37,429 worth of Chemical Safety Data Sheets, \$8,146 of Chem-Cards, \$2,257 of Safety Guides and our royalties from Van Nostrand Reinhold Company for publication of the "Guide for Safety in the Chemical Laboratory" amounts to \$3,592 - for a total of \$51,415.

The Committee early in the game established liaison with OSHA officials to promote the review of proposed safety standards and to promote changes in already established standards. We have had a fair degree of success. Our first successful change was in Table 12 of the Flammable and Combustible Liquids Section of the standard which was amended to permit the use of one-gallon glass or plastic containers for Class IA and IB flammable liquids. Prior to this change the standard limited the use of glass or plastic containers to one-pint for IA and one-quart for IB liquids. On May 10, 1973 we received a reply to our proposals from the Secretary, Office of Standards wherein he stated: "We concur that the pure public and property protection standards should be removed from the OSHA Standard and we are working toward that end." One immediate result was the restoration of Section 1910.177, Indoor General Storage. At the moment proposed amendments for Walking-Working Surfaces is out for comment. In addition, there have been various OSHA Directives issued to the Compliance Offices that modify the literal interpretation of many of the Standards. These efforts are part of the Committee through its own task group and the inter-committee task group and have resulted in the removal of onerous restrictions and considerable cost savings to the industry.

However, OSHA and NIOSH have just begun. - Our Committee was concerned enough to go on record that the MCA staff should take a more activist approach in coordinating all OSHA and NIOSH matters and that one staff person should be assigned the task. Early response by the MCA to emergency standards and/or NIOSH criteria documents provides a possibility of input into the proposed permanent standard before publication in the Federal Register. Hopefully, this will reduce the prolongation that occurs once a standard is published. One result of this request by the Committee has been the addition of a new staff man and reorganization of the staff function to meet this need.

During the past four years much of the Committee's activities have been directed to OSHA and its impact on our industry, and there has been a recognition that OSHA at present deals only with mechanical and environmental standards. The legislation leaves many elements of an acceptable safety and fire protection program untouched, especially management direction and the development of employee safety awareness.

Historically, the Committee has been management direction oriented and rightfully so, as total commitment by management to a safety program is a must. The Committee has made many contributions to the improvement of safety programs, and a recent publication "Guidelines for Risk Evaluation and Loss Prevention in Chemical Plants" introduced a concept that has gained wide acceptance in the industry. Today nearly every chemical plant conducts some form of safety review of new processes or modification of existing processes. Evaluation is made of potential hazards to employees of the raw materials, intermediates, finished products and by-products and as new and/or potentially

hazardous materials are uncovered, toxicity studies are conducted to provide data upon which to establish safe procedures and safe equipment for working with the materials. In addition to toxicity studies, health hazard evaluation programs are becoming the norm. Monitoring through continuous sampling, and biological checks, morbidity and mortality studies, statistical analysis and epidemiological studies provide health data banks to overcome potential health hazards. As part of this review, environmental impact investigation is also done.

Another form of review promoted by the Committee is the safety audit. This audit is a thorough review, usually done by a team which inspects a plant's physical facilities and safety and health programs. In this connection we are working on improving our measuring techniques. That is, what constitutes a good plant safety program and how effective is it.

At our combined safety and health workshop held in Atlanta, Ga. last month we discussed and distributed a safety guide which describes how a small plant might conduct a safety inspection. We have been trying to reach the smaller company through our safety publications and especially through our workshops, but we have always been disappointed in the lack of attendance by small company representatives.

All of the previous mentioned activities are of critical importance to a safety program, however, in themselves they do little to improve safety awareness on the part of the employee.

The approach to the development of employee safety awareness has not been very sophisticated. Traditionally we have relied on posters, banners, contests, prizes, etc., which do not have any permanent effect on an employee's safety attitude. Only recently have job enrichment techniques been applied with safety in mind. Safety attitude surveys have also been tried, but have tended to be data-gathering instruments, rather than instruments of change. Safety indoctrination and training of new employees has improved by the use of new learning methods such as programmed instruction and video tape replay. But, actually, in most plant safety programs, at least until recently, there has been very little, if any, direct involvement in the safety programs. Usually, directives come down from up high to be carried out by the employee - which he resents and resists often by ingenious use of negative creativity.

Based on my observation of safety at the working level, I have reached the conclusion we need an Off-The-Job Safety and Health Act, more than an Occupational one. OSHA is almost too late to have a direct effect on employee performance. OSHA, in effect, concedes this point by stating the employer must enforce the safety standards by disciplinary action, if necessary. Also, to date, OSHA has had little effect, if any, on the national accident frequency rate. For us to have truly effective safety programs in the future, we need to hire new employees who are already safety conscious - because I'm not at all confident that with approaches available today we can appreciably change the basic attitude or behavior of an individual at 18. To overcome this behavior pattern, we have designed systems, procedures and practices to protect the employee from himself, but

we haven't been too successful, if we go by the safety record. Congress has done the same thing in recent consumer legislation. The automobile safety standards, for example, but aren't they really an admission that we cannot change the driver's attitude or behavior? Doesn't the same admission apply to the industrial worker, as he is the one and the same driving the automobile? The Off-The-Job Safety and Health Plan I'm proposing would provide safety programs for the home, pre-kindergarten, kindergarten, elementary school and high school. These programs would be soft-sell to the home through mass media (love-seat-belts) and hard-sell starting in pre-kindergarten in an attempt to establish peer group pressure at all levels, that is, safe behavior because society demands and expects it.

In summary, the Committee is progressing in the "routine" safety and fire protection activities, but retrogressing where it counts. We need to concentrate on the new frontiers of accident prevention in an attempt to make the breakthroughs required to achieve improved safety performance on and off the job. With your support and guidance, we will make this a major Committee objective.