

A&WMA

February 13, 2019

EHS Management



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INTRODUCTION

EHS Management Realities

- Challenges
- Strategies
- Harcros Examples

Legal Challenges

- OSHA
- DOT
- EPA
- DHS
- FDA
- ATF
- FRA
- Department of Justice
- ANSI, ASTM, NFPA
- General Duty Clause (OSHA/EPA)
- Sarbanes Oxley (SOX)

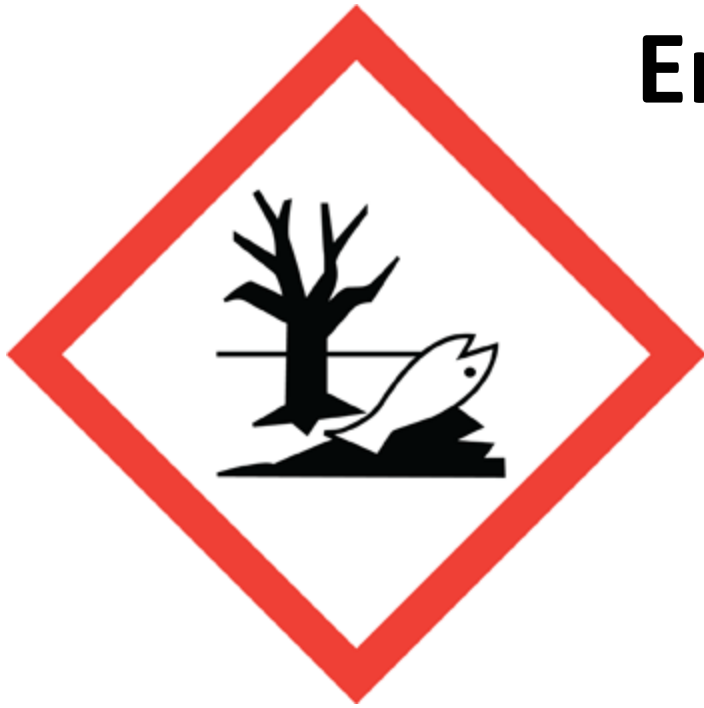


Public Opinion

FREEDOM INDUSTRIES



Environment



Human



Why Do Accidents Happen?



The “WHAT” vs. The “HOW”



Attributes of Accidents

- Characteristics of the work (Physical Hazards)
- Organizational environment (Culture)
- Psychological and behavioral characteristics of the individual



Organizational Levels of Responsibility

- **Executive Management**

- High level commitment = lower accident rates (Cheyne et al., 1998; Zohar, 1980).

- **Supervision**

- Work group encouragement and support (Donald, 1995).
- Enforcement

- **Worker**

- Participation/Ownership (Lee, 1995)
- What motivates workers to take responsibility?

World Class SAFETY - The Leader's Role

- Don't accept non-compliance
 - Understand the risks
 - Remain engaged
 - Enforce rules consistently
 - Listen to your fellow workers
 - Continuous improvement
 - Learn from mistakes
 - Be an advocate for your fellow workers
 - Be observant
- Safety
- 
- A diagram consisting of ten bullet points on the left side of the slide. From each bullet point, a thin black line extends to the right, ending in a small arrowhead that points towards the word "Safety". The arrows from the first seven bullet points are more prominent, while the last three are shorter and less distinct.

You are the single most important factor in the safety
of your fellow workers

World Class ~~Safety~~ Quality Performance

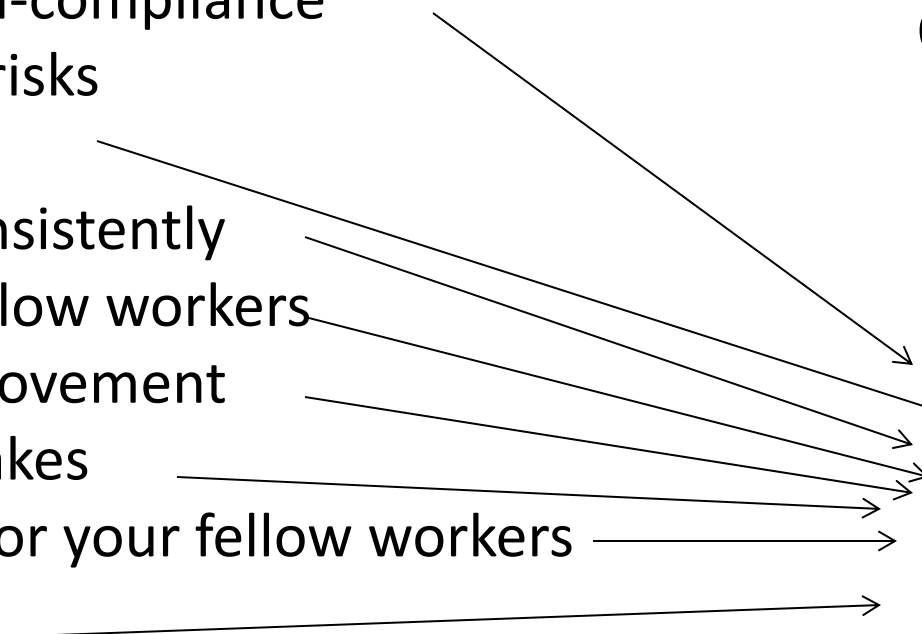
The Leader's Role

- Don't accept non-compliance
 - Understand the risks
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 - Enforce rules consistently
 - Listen to your fellow workers
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 - Learn from mistakes
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 - Be observant
-
- The diagram features three labels on the right side: 'Quality' at the top, 'Safety' in the middle, and 'Production' at the bottom. From the list of leader roles on the left, arrows point towards these labels. Specifically, 'Don't accept non-compliance' points to 'Quality'. 'Understand the risks' points to 'Quality'. 'Remain engaged' points to 'Quality'. 'Enforce rules consistently' points to 'Quality'. 'Listen to your fellow workers' points to 'Quality'. 'Continuous improvement' points to 'Quality'. 'Learn from mistakes' points to 'Quality'. 'Be an advocate for your fellow workers' points to 'Safety'. 'Be observant' points to 'Production'.

You are the single most important factor in the quality performance of your function

World Class ~~Safety~~ Production Performance

The Leader's Role

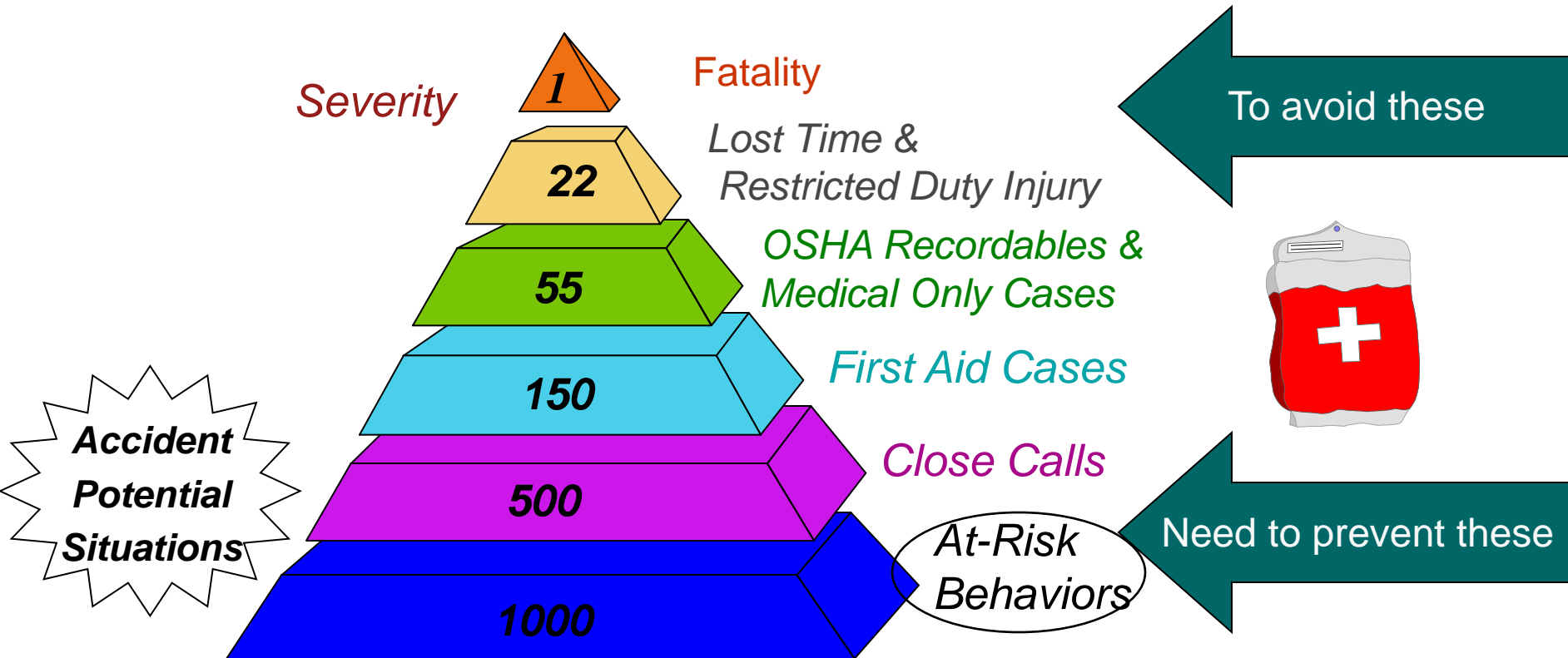
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 - Learn from mistakes
 - Be an advocate for your fellow workers
 - Be observant
- Quality
- Safety
- Production
- 
- A diagram consisting of ten arrows pointing from the list of leader roles on the left to the words 'Quality', 'Safety', and 'Production' on the right. The arrows from 'Don't accept non-compliance', 'Understand the risks', and 'Remain engaged' point to 'Quality'. The arrows from 'Enforce rules consistently', 'Listen to your fellow workers', and 'Continuous improvement' point to 'Safety'. The arrows from 'Learn from mistakes', 'Be an advocate for your fellow workers', and 'Be observant' point to 'Production'.

You are the single most important factor in the production performance of your function

Stop Measuring Accidents as Performance

- Measure compliance with your program
- Measure behaviors
- Measure what you are doing not what already happened
- Measuring accidents is a deterrent to employee reporting
- Stop punishing injured employees (Section 11c of the OSHA Act)

Accountability: Positive/ Negative Reinforcement



Safety First!?

- Safety performance is the product of the activities of an organization.
- It is part of the overall functioning system that enables an organization to achieve goals and objectives.
- Safety does not live in one department nor in one policy.
- If safety is not integrated into the daily processes and activities of an organization, it will not be successful.

Let's Talk Strategy

Key factors for EHS effectiveness

- Top management demonstrates EHS leadership, commitment, responsibility and accountability;
- Consultation and participation of workers;
- Allocation of necessary resources;
- Effective processes for identifying hazards, controlling risks, and taking advantage of EHS opportunities;
- EHS objectives that align with the organization's goals and take into account its hazards;
- Integration of EHS into the organization's daily business processes.
- Compliance with legal requirements.

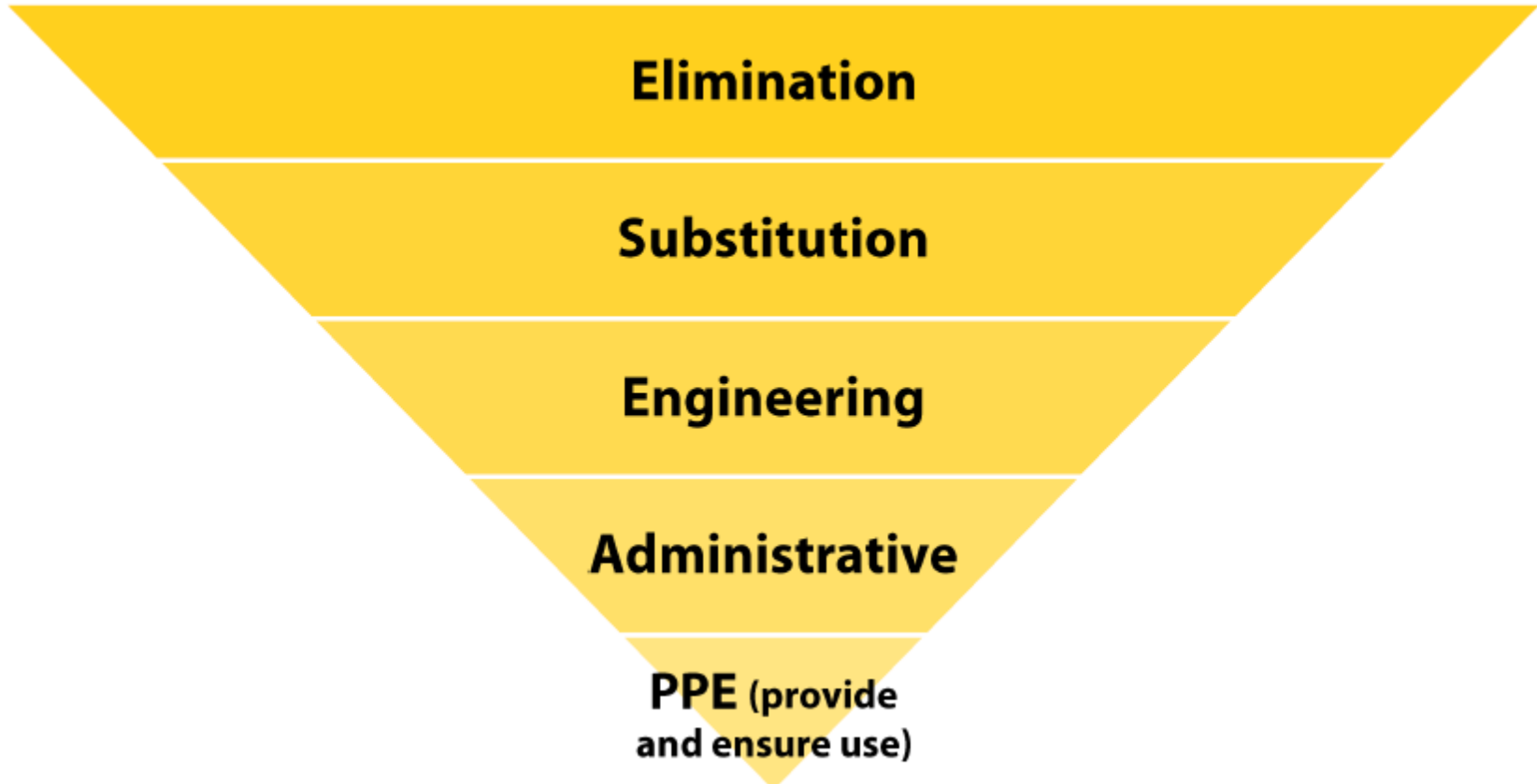
Defining the Scope of EHS Management

- Consider both internal and external issues;
 - Take into account the relevant needs and expectations of workers and other interested parties;
 - The planned or performed work-related activities that can impact the organization's EHS performance;
- ★ Management structure of the organization.

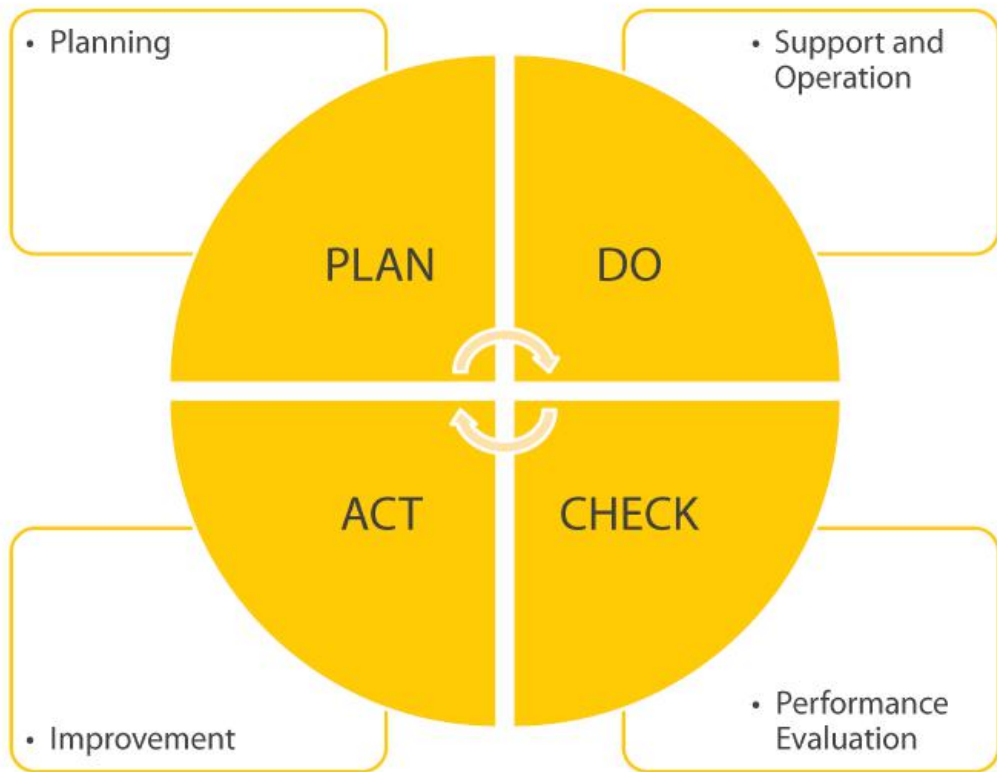
Organization Dysfunction

- Absence of Trust
 - Individuals hide incidents; point fingers; don't offer help
- Fear of Conflict
 - Avoiding the real root causes; underlying politics
- Lack of Commitment
 - Causes ambiguity of direction and priorities; breeds lack of confidence in EHS systems
- Avoidance of Accountability
 - Causes resentment; places undue burden on others

EHS Planning and Control



The PDCA Foundation



1. Plan: objectives, programs, and processes
2. Do: process implementation as planned
3. Check: monitor and measure activities and processes
4. Act: take actions to achieve intended outcomes

Planning and Objectives

Organization will determine:

- What will be done;
- What resources will be required;
- Who will be responsible;
- When it will be completed;
- How results will be evaluated;
- How actions used to achieve objectives will be integrated into the organization's processes.

Harcros EHSS Insight

Remediation:

Primary: Jack Cleary
Secondary: Shae Threlkeld and Kevin Roepe

FDA

Primary: Shae Threlkeld
Secondary: Jack Cleary

Pesticides

Primary: Shae Threlkeld
Secondary: Jack Cleary

TSCA/REACH

Primary: Ann Marie Savini
Secondary: Jack Cleary

Land Purchase or Leases

Primary: Jack Cleary and Shae Threlkeld

ENVIRONMENTAL MATTERS

Primary: Ryan Doyle
Secondary: Jack Cleary

DHS and Security:

Primary: Jim Blow
Secondary: Haley Russell

Insurance

Primary: Jim Blow
Secondary: Eric Patton

Contracts (CAPs)

Primary: Jim Blow
Secondary: Jack Cleary

Training

Primary: Pam Logan
Secondary: Jim Blow

SOP Document Control

Primary: Jim Blow

DEA

Primary: Steve Gripp
Secondary: Jack Cleary

Safety/OSHA

Primary: Eric Patton
Secondary: Haley Russell

Process Safety Management (PSM)

Primary: Eric Patton
Secondary: Ryan Doyle

NFPA (Sprinkler and fire protection, electrical)

Primary: Eric Patton
Secondary: Ryan Doyle

Industrial Hygiene

Primary: Eric Patton
Secondary: Haley Russell

SDS/Labels/GHS

Primary: Michael Hemme
Secondary: Shae Threlkeld

Work Comp

Primary: Eric Patton
Secondary: Haley Russell

RMP

Primary: Ryan Doyle
Secondary: Eric Patton

Infrastructure & Equipment (Maintenance)

Primary: Kevin Roepe
Secondary: Ryan Doyle

Water (Sewer, Stormwater (NPDES), SPCC)

Primary: Vinay Nair
Secondary: Lauren Scott

Waste & Sustainability (RCRA)

Primary: Kevin Roepe
Secondary: Ryan Doyle/Jack Cleary

Alcohol Sales:

Primary: Ryan Doyle
Secondary: Lauren Scott

Air Permits

Primary: Ryan Doyle
Secondary: Kevin Roepe

EPCRA (TIER II, TRI)

Primary: Lauren Scott
Secondary: Vinay Nair

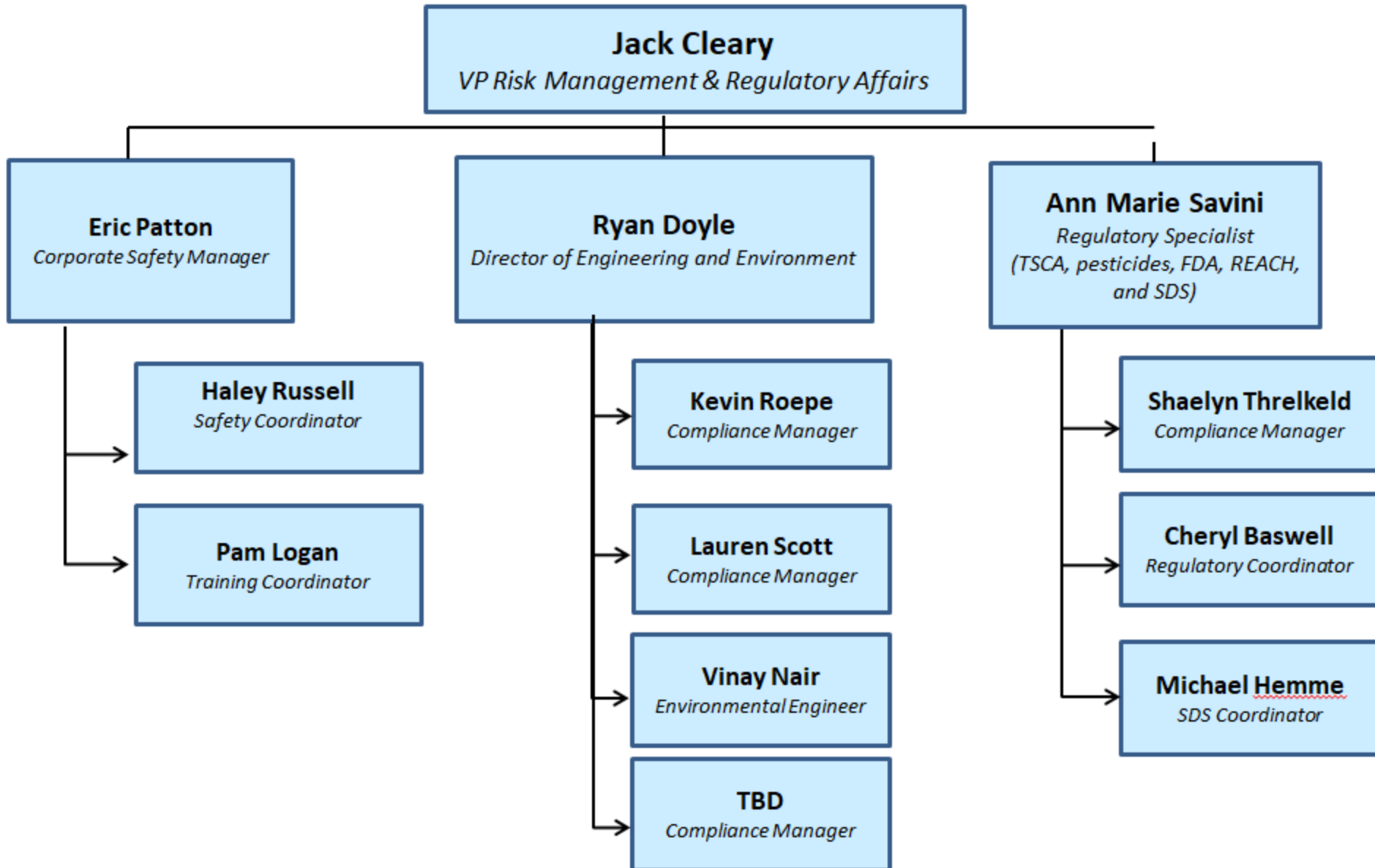
Internal Audits

Primary: Lauren Scott (Program Manager)
Secondary: Ryan Doyle

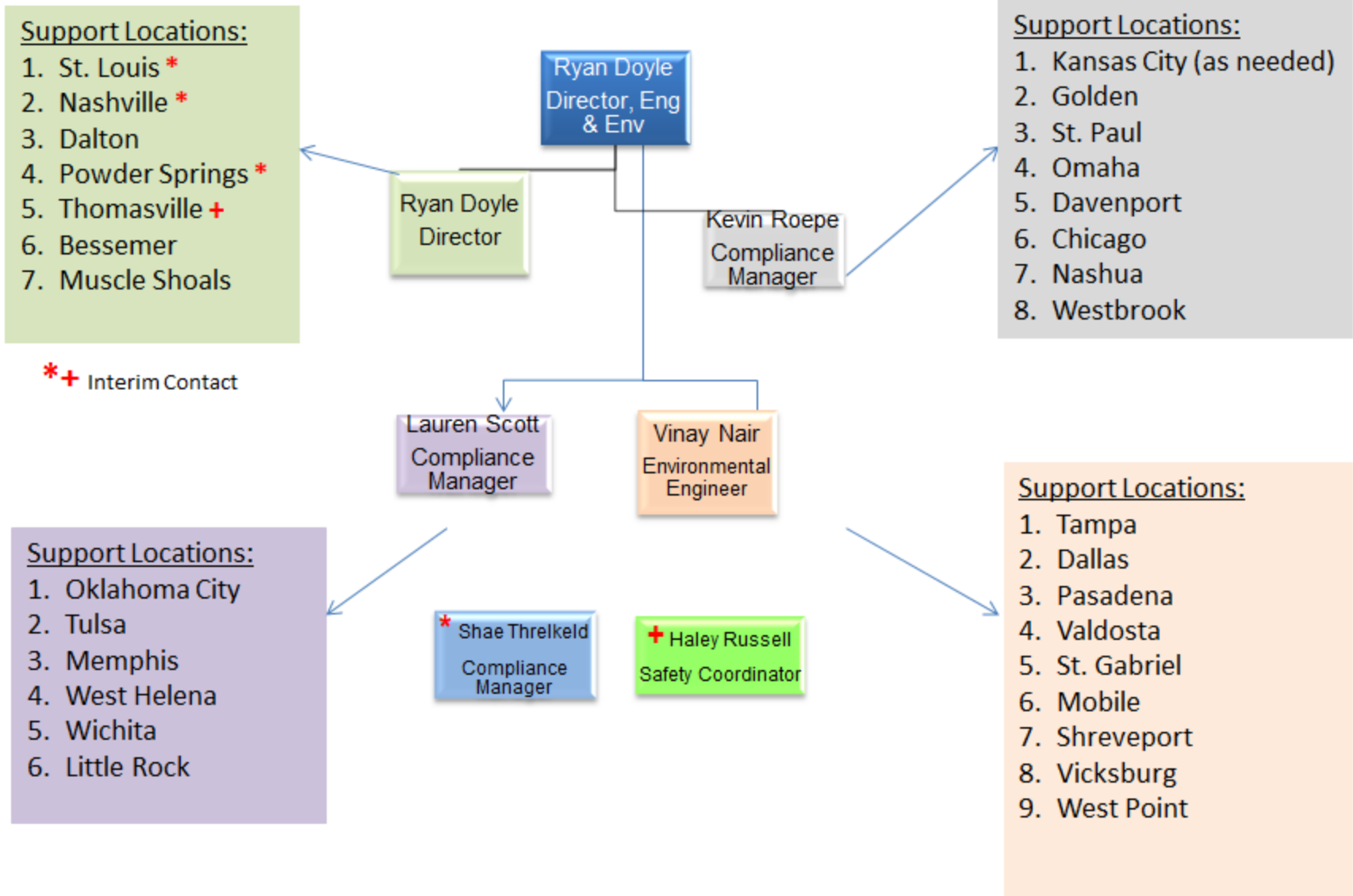
Engineering (Design)

Primary: Ryan Doyle
Secondary: Kevin Roepe

Risk Management & Regulatory Affairs



Risk Management & Regulatory Affairs



Harcros EHSS by the Numbers

- 31 locations in 19 states
- Dept. more than doubled in last 5 yrs
- 25 sites were manufacturing products
- 15 sites now considered “hubs”
- Over 400 product manufactured
- 5000+ SDSs /GHS / TSCA
- 40 day average turnover of inventory
- 585 Employee Owners