

**U.S. Chemical Safety and
Hazard Investigation Board**

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Office of the Chair



January 29, 2013

Honorable Arthur A. Elkins, Jr.
Inspector General
U.S. Environmental Protection Agency
Washington, DC 20460

**Re: U.S. Chemical Safety and Hazard Investigation Board (CSB) Response
to EPA OIG Report No. 12-P-0724**

Dear Mr. Elkins:

This letter is in response to your August 22, 2012, letter to the Chemical Safety Board Chairman, requesting a written response to Recommendation 1 as presented in the report listed above. In addition, this letter will update you on the implementation status of planned actions for the other recommendations.

Recommendation 1A – Update board orders to ensure that CSB achieves its mission of chemical accident prevention through improved recommendations processes, to include Board Order 22, CSB Recommendation Program.

The revised Board Order 22 was submitted to the Board for consideration and calendared by one of the members on November 1, 2012. The completion date will depend on the course of future Board deliberations.

Recommendation 1B – Update board orders to ensure that CSB achieves its mission of chemical accident prevention through improved recommendations processes to include: Board Order 01, Board Quorum and Voting, to establish and implement guidelines that define the length of time notation items can be calendared before a vote must be taken.

The CSB disagreed with the recommendation. No further action will be taken.

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Recommendation 1C – Update board orders to ensure that CSB achieves its mission of chemical accident prevention through improved recommendations processes to include: Board Order 040, Investigation Protocol, to clearly outline roles and responsibilities of the office of Recommendations and Office of Investigations with respect to the recommendations process, including a requirement that Office of Recommendations staff participate in accident investigations, and identification of the office responsible for identifying potential recommendation recipients.

Due to our workload to complete several investigations by the beginning of the 2nd quarter, we did not meet our previous deadline of December 31, 2012, to complete the sections related to the OIG's recommendations. The staff task force completed the section on Causal Analysis and it has been approved by the Board. The task force from the Offices of Investigations, Recommendations, and Administration met on January 22, 2013, to create chapter work plans for Product Development and Review and Recommendations.

Recommendation 2A – Make full use of TRIM's capabilities to include: incorporating formal scheduling components in TRIM to track the recommendations process and alert staff to impending milestones to ensure timely follow-up.

The CSB has programmed our TRIM database to automatically prompt assigned recommendation specialist to review each open recommendation file at least once every six months. The "Tickler" system is currently in the testing phase. Full implementation is expected by January 31, 2013.

Recommendation 2B – Make full use of TRIM's capabilities to include: Highlighting the absence of required supporting documentation.

See response to Recommendation 2A

Recommendation 3 – Implement a formal advocacy program to advocate for safety recommendation implementation, to include adoption of most-wanted safety actions.

The CSB agrees with the recommendation. The Board approved Board Order 46, Most Wanted Chemical Safety Improvements Program. Selection of the first two Most

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Wanted Safety Improvements is scheduled to occur during the public launching of the Most Wanted Safety Improvements Program during the first half of 2013.

We will continue to keep you abreast of our accomplishments in these areas.

Sincerely,

A handwritten signature in cursive script, reading "Rafael Moure-Eraso". The signature is written in black ink and is positioned above the printed name.

Rafael Moure-Eraso, PhD
Chairperson