

June 17, 2019

Dr. Kristen Kulinowski Interim Executive Authority Board Member U.S. Chemical Safety and Hazard Investigation Board

Mr. Manuel "Manny" Ehrlich Board Member

Mr. Rick Engler Board Member

Dear CSB Members Kulinowski, Ehrlich, and Engler:

We are writing to express our objection to the CSB's decision to exclude a dedication to Roger Cunningham, 55, Josh Ray, 35, Cody Risk, 26, Matthew Smith, 29, and Parker Waldridge, 60, in the agency's investigation report of the 2018 fatal blowout at the Pryor Trust gas well in Pittsburgh County, Oklahoma. A dedication page with the names of victims of fatal chemical safety incidents is a simple, but powerful fact that these individuals are not statistics. They were husbands, sons, fathers, and co-workers whose deaths were preventable.

In 2014, CSB leadership decided to include the names of fallen workers in its reports. Since then, the five consecutive fatal injury incident reports prepared by the CSB have had a dedication page. In total, 24 individuals are memorialized in these reports (i.e., PCA DeRidder Paper Mill (report released April 2018); Airgas (Air Liquide) (report released April 2017); Williams Geismar Olefins Plant (report released Oct 2016); West Fertilizer (report released Jan 2016); and AL Solutions (report released July 2014). We note that the 2011 report of the National Commission on the BP Deepwater Horizon Oil Spill lists the names of the 11 workers killed in that disaster, as does every fatality investigation report issued by the Mine Safety and Health Administration.

The reports prepared by the CSB are significant historical records of catastrophic events. They are official government records. Years down the road, when local news stories have long disappeared from the Web, the CSB reports may be the only source for the victims' names. We urge the CSB to amend its report to include the names and photos of the five men who were fatally injured at this workplace. We also urge the CSB to adopt a written policy that will ensure that the names and ages of fatality victims be included in its investigation reports.

Our extensive professional work in workplace education and training in addition to other specialties affirms the value of giving tribute to workers whose lives have been cut short by tragic workplace incidents. By including names and photos, the impact and educational value of these materials increase dramatically.

Please let us know if we can be of assistance on this matter.

Sincerely,

Marcy Goldstein Gelb

Marcy Goldstein-Gelb and Jessica Martinez

Co-executive directors, National Council for Occupational Safety and Health

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Tonya Ford, Executive Director, United in Support and Memorial for Workplace Fatalities

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