CONTRA COSTA HEALTH

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TO: INDUSTRIAL SAFETY ORDINANCE/COMMUNITY WARNING SYSTEM AD HOC COMMITTEE

FROM: NICOLE HEATH, DIRECTOR OF HAZARDOUS MATERIALS PROGRAMS

SUBJECT: SAFETY CULTURE ASSESSMENT FOLLOW-UP

DATE: JULY 11, 2024

CC: HAZARDOUS MATERIALS COMMISSION

At the previous ISO/CWS Ad Hoc Committee meeting on May 30, 2024, Contra Costa Health (CCH) Hazmat was requested to obtain information on the following related to Safety Culture Assessments (SCA):

A. SCA Participation rates for MRC, P66, and Chevron
B. Reporting unsafe conditions
C. Information to assist in drawing comparisons between facilities.

A. SCA Participation Rates

The table below summaries the participation rates targeted and achieved at the three refineries which presented at the previous ISO/CWS Ad Hoc Committee meeting:

Facility	Target Participation Rate [1]	Total Employees	Workgroups				
			Operations	Maintenance	Engineering	Health and Safety	Contractors
Chevron	60%	55%	37%	56%	84%	86%	19%
MRC	70%	71%	61%	69%	72%	71%	44%
P66	70%	81%	72%	84%	94%	71%	66%

Note: 1 - Target participation rate is the same for total employees and each individual workgroup

Both Chevron and P66 conducted their SCAs during the Covid-19 pandemic. Chevron conducted its SCA in the fall of 2020 at the height of the pandemic, which resulted in less-than-ideal participation, which under normal circumstances have resulted in an action item from CCH. P66 requested and received a one-year extension from CCH and conducted its SCA in 2021, which resulted in much higher participation rates. During CCH's 2022 audit of Chevron, the refinery was informed that participation rates for future SCAs must have higher participation rates.

CCH reviews the results of each facility's SCA during onsite audits. CCH views low participation rates, in total or in any workgroup, as indicators that aspects of a facility's culture need improvement. Contractor participation rates for all three refineries did not meet targets.

CCH will continue to monitor the participation rates for all future SCAs and will issue action items as warranted.

B. Reporting Unsafe Conditions

Each of the three refineries that summarized their SCA results, have mechanisms for employees and contractors to report unsafe conditions. This can be done anonymously or through a more formal reporting process. Once a situation is reported, each company has its own process to address the issues identified. In addition, each refinery has a Stop Work Authorization process that requires specific steps to be taken if an employee or contractor identifies a safety concern.

County Industrial Safety Ordinance (ISO) does not require an assessment of reporting unsafe conditions within a site's SCA although Program 4 requirements under the California Accidental Release Prevention (CalARP) program does. All three refineries assessed for reporting unsafe conditions within their SCA. In future SCAs P66 would not be required to assess this since it has been reclassified as a renewable fuels refinery (versus a petroleum refinery) and is no longer subject to CalARP Program 4 requirements.

C. Comparisons Between Facilities

As stated in the county SCA guidance, safety culture assessments should be viewed as a facility-specific exercise. Neither county ISO nor CalARP Program 4 contain requirements that promote safety culture comparisons between facilities. ISO facilities are allowed to use different methods to conduct their SCA (i.e., written surveys, interviews, observations, or focus groups). Even though, to date, each ISO facility predominantly has conducted written surveys, there is no regulatory requirement to use the same or similar questions.

Safety culture assessments are the summation of individual opinions provided in a snapshot in time. Each ISO facility attempts to schedule their SCA during neutral periods to minimize external influences. Many times, it is a challenge to land on a neutral period when the safety culture assessment is due every 5 years.

CCH works closely with regulated facilities developing safety culture assessments to ensure they are committed to making good-faith efforts to improve, and to ensure the plans and projects arising from this work align with needs observed by CCH and would meaningfully contribute to improvement.

All of that said, the effectiveness of each facility's process safety culture is best measured by the results of audits and investigation of accidental releases.