



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 Waldrige, 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 and Jessica Martinez
Co-executive directors, National Council for Occupational Safety and Health
617-642-1878 * marcy@nationalcosh.org; Jessica@nationalcosh.org

Tonya Ford, Executive Director, United in Support and Memorial for Workplace Fatalities
Jeanette Zoeckler, PhD, MPH, Director of Preventive Services, Occupational Health Clinical Center (Syracuse, NY)
Milly Rodriguez, Occupational Health and Safety Specialist, American Federation of Government Employees
Ellie Barbarash, CPEA, Safety and Health Coordinator, HPAE
Paul Landsbergis, Associate Professor, SUNY Downstate, School of Public Health
Darrell Hornback, Director, Health and Safety, International Chemical Workers Union
Michael McCann
Sara Markle-Elder
Nicole Fuller, Director, PhilaPOSH
Patricia Strizak, Worker Health Educator, UMass Lowell
Mary E Miller
Diane Richter, First VP, WisCOSH
Alejandro Zuniga, Director of Safety and Health Programs, Fe y Justicia Worker Center
Michael Felsen, Access to Justice Fellow, Justice at Work
Amber Mitchell, Section Chair, American Public Health Association
Celeste Monforton, DrPH, MPH
Daniel Brustein, MD, FACOEM, CIH
Dorothy Wigmore, Occupational Health Specialist
Joan Lichterman

Beth Rosenberg, Assoc. Professor/Former CSB Board Member,
Tufts University

Rachel Micah-Jones, Executive Director, Centro de los Derechos del
Migrante, Inc.

Germain Harnden, Executive Director, Western New York Council on
Occupational Safety and Health

Deborah Gold, Certified Industrial Hygienist

Rafael Moure-Eraso, Emritis Professor, UMass Lowell,
Former Chair CSB (2010 – 2015)

Katherine Rodriguez, CPA

Jay Herzmark, Director, SafeWork Washington

Peg Seminario, Safety and Health Director, AFL-CIO

Kenneth Rosenman, Professor of Medicine, Michigan State University

David Kotelchuck, Professor Emeritis, Occupational Health and Safety,
Hunter College

Fran Ansley, Distinguished Professor of Law Emerita, University of
Tennessee College of Law

Mark Catlin, Industrial Hygienist, MDC Consulting and Training

Carol Gay, President, NJ State Industrial Union Council

Gail Bateson, former Executive Director, WorkSafe

Deborah Berkowitz, Worker Health and Safety Program Director,
National Employment Law Project

Jim Schultz, Executive Director, WisCOSH

Shanna Devine, Public Citizen

Katie Tracy, Center for Progressive Reform

Mike Wilson, National Director, Occupational and Environmental Health, BlueGreen Alliance
CSTE

Katherine Kirkland, Executive Director, Association of Occupational and Environmental
Clinics

Western New York Council on Occupational Safety & Health (WNYCOSH)

Robyn Robbins, United Food and Commercial Workers

Al Vega, Director of Policy and Programs, MassCOSH

Capt. (Ret'd) Peter A. Doob, MSPHA, JD

Bill Borwegen, Health & Safety Director (1983-2013), Service Employees International Union
Worksafe

Jonathan Karmel, The Karmel Law Firm

Linda Forst

Elise Pechter

David Wegman, Professor Emeritus, University of Massachusetts Lowell

Schuyler Geery-Zink, Staff Attorney, Nebraska Appleseed

Mike Fitts, Executive Director, Connecticut Council on Occupational Safety and Health

Roberta Smith, Occupational Health Manager, Colorado Department of Public Health
and Environment

Laura Stock, Labor Occupational Health Program Ellen G. Widess, Former Chief of Cal/OSHA

Nancy Lessin

Laura Punnett, Professor

Suzanne Marria, Attorney at Law, California

Michael J. Wright, Director of Health, Safety and Environment,
United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and
Service Workers International Union

Joel Shufro, former Executive Director, NYCOSH