

INTRODUCTION

How to Use This Workbook

This workbook is a practical working document designed to guide chemical industry personnel through Title III communications activities during 1988. It identifies some of the specific communications issues related to Title III and provides information on risk communication, and community and media relations approaches that can be used to address them.

It includes ideas, suggestions, examples of what has worked in communicating with employees, the media and the community. In Tab 5, a step-by-step communications plan is recommended for January through June.

This is not a compliance document. It supplements CMA's "Manager's Guide to Title III", which provides detailed technical guidance on complying with the law. Under no circumstances should a facility fail to meet all of the regulatory requirements of Title III on time. Failure to obey the law will quickly destroy community rapport.

This workbook looks at Title III from the point of view of those receiving the information. It offers simple advice on communicating complicated messages to those audiences.

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Legal Notice

This workbook is intended to be an information document that provides general communications guidance to chemical industry personnel on Title III of the Superfund Amendments and Reauthorization Act of 1986. It is not within the scope of this workbook to analyze specific legal, regulatory and technical issues that may arise in complying with Title III.

Each company should consult with EPA or its own legal counsel as to compliance issues. CMA does not assume any liability resulting from the use of or reliance upon any information, procedures, conclusions or opinions contained in this workbook.

OVERCOMING THE FEAR OF TRYING

The chemical industry can work within the requirements of Title III to achieve two important objectives: improving local emergency planning and informing the public about chemical operations. These objectives are vital to the long-term success and competitiveness of the chemical industry. Facility managers must take the initiative and work directly with local government and the community to make this law work.

Compliance and communications are the direct responsibility of every chemical facility manager. And the sooner you start, the easier and more effective it will be.

Your response to Title III should go well beyond submitting the proper information to the required agency or group. Successful implementation means reaching out — to employees, the community and the media — to form working partnerships for emergency planning and talking to the community about plant emissions. The chemical industry has positive information to communicate. Consider:

- *Most chemical facilities in the nation have significantly reduced their emissions during the past several years.*
- *Since 1985, more than 1,500 chemical plants have implemented Community Awareness and Emergency Response programs, working before the enactment of Title III with thousands of communities to prepare for and avert accidents.*
- *Chemical plants are safer than ever.* OSHA, in its 1986 Chemical Special Emphasis Program Report, said its review of 40 chemical facilities showed "levels of compliance are generally high because of the advanced technology of the industry and because of general awareness of catastrophic potential."

We have many good things to say, even when it comes to talking about a difficult subject like emissions.

The challenge in making this law work effectively for everyone lies in communicating — honestly and frequently — about our operations, their hazards and how we handle them. But we must begin reaching out *now*, during the window of opportunity, before emissions data must be reported in July, 1988.

Robert D. Kennedy, chairman and chief executive officer of Union Carbide Corporation, recently spoke to a group of chemical industry managers about Title III. He said the chemical industry has the means to soften the impact of Title III information.

"I'm not talking about teaching the public to love chemicals," he said. "I am talking about helping people to understand the stream of new information that will inundate them next spring and summer."

He also told his company's management that Title III activities must receive top level attention. "Not only should we carefully prepare the material to be filed, but I believe that well before its release we should review and discuss the data with responsible local community officials in every community where we operate."

The leadership of the chemical industry is genuinely committed to complying with the law and at the same time improving the public's understanding of its operations. You, the facility manager, can make this law work in your community by beginning an aggressive public communications program now. You have everything to gain by trying.

Under SARA Title III, a significant amount of quantitative and general process information must be communicated to regulators and the community. In this section, we will briefly discuss what data is required, where it goes, when it is due and how it is likely to be received.

Communications activities specific to each section are also recommended. Be sure to consult your corporate Public Affairs staff before beginning any site communications activities. (See the CMA "Manager's Guide to Title III" for specific technical compliance guidance.)

Emergency Planning

Section 303: Comprehensive emergency response plans

- What:** Information on relevant facility changes as such changes occur or are expected to occur. Upon request, information necessary for developing and implementing the local emergency response plan.
- Where:** Information goes to the Local Emergency Planning Committee (LEPC).
- When:** Local emergency response plans are due in October, 1988.
- What to expect:** By law, emergency response plans must include specified information. Facilities may be asked to provide additional information relevant to the emergency response plan.

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Emergency Planning: Recommended Communications Activities

1. **Become an active member or participant of the LEPC if you aren't already.** As a member of this group, you have an opportunity to interpret Title III data accurately to the community and the media. Industry participation on the LEPC will make a direct and valuable contribution to the community. Remember to work in conjunction with other local chemical industry facilities to assure consistent messages and themes.
 - Explain your facility and its emergency procedures as thoroughly as possible to the LEPC. Members can then report up-to-date and accurate information to their organizations.
 - Answer questions one-on-one.
 - Build credibility with key members of the community.
 - Let the LEPC know your company is committed to protecting the environment and the health and safety of its workers and the public.
 - Cooperate with efforts to improve local emergency response planning and participate in the CAER program.

An EPA official recently told industry representatives that most LEPCs have no understanding of what is expected of them. "EPA does not have the time or money to educate and train LEPCs," she said. "It is up to industry to take a leadership role and to educate the LEPC," she added.

Don't miss these meetings. Encourage other industry personnel to attend them.

2. **Develop a brief, but comprehensive package of plant information that may include:**
 - simplified plant and process schematics;
 - description of process, products and materials;
 - site emergency plan, including description of emergency equipment and fire fighting capabilities;
 - safety and employee health records;
 - economic contributions to the community;
 - description of involvement in community activities (e.g. Little League, United Way).
 - environmental programs (e.g. waste reduction, air quality)

3. **Prepare a short videotape or slide/tape presentation showing what goes on in the plant.** It should include information about the process, products, hazardous materials used at the plant, emergency procedures, safety and health programs, and regulatory compliance.

If you operate a small facility or are one of many plants in an area, consider coordinating efforts on audio-visual projects.

The presentation can be used at an LEPC meeting and also as a basic approach for communicating to the community about your facility and its activities. If a videotape is prepared, it can also be used by the media as background footage for stories about the plant. You should also include written materials such as brochures and facility fact sheets with audio-visual materials.

4. **Personally make a presentation to the LEPC.** Volunteer your expertise and that of your plant technical staff in the local emergency planning process. Offer to make the same presentation to organizations represented on the LEPC. Again, coordinate with nearby chemical facilities.
5. **Invite members of the LEPC to bring their organizations to the plant for a tour.** Involve employees in the event.
6. **Be prepared for requests for additional information,** e.g., risk assessments and vulnerability studies. Determine in advance how to handle these requests and what information you will provide, such as process safety analysis reports.
7. **Communicate with the community and local media about changes to the facility that will be reported to the LEPC.**

Emergency Notification

Section 304

- What:** Information about emergency releases of covered substances that have potential to go beyond the fenceline must be reported.
- Where:** Information goes to the National Response Center, to the State Emergency Response Commission (SERC), and to the LEPC.
- When:** Calls must be made immediately. Written follow-up required to LEPC and SERC as soon as practicable.
- What to expect:** Notifying the SERC and LEPC may result in immediate media attention, regardless of the size of the release.

**Emergency Notification:
Recommended Communication Activities**

1. **Develop a crisis communications plan.** This document should supplement your site emergency response plan. It should address issues like:
 - Who gets called first?
 - Who handles the media? Do you have on-site facilities with telephones for the media if they are covering an incident at the plant?
 - Who are your spokespersons and their back-ups?
 - How is the community informed of an incident?
 - Does the community know what to do?
 - Do your employees know what to do?
 - What should employees tell their families or the media if they are questioned?
 - Who will provide health risk and medical advice?
 - Have logistics been worked out with medical and emergency response personnel?
2. **Train a number of spokespersons.** There is no substitute for practice, practice, practice. Make sure those who are designated to speak for the facility notify appropriate parties and handle subsequent inquiries from the media and the community.
3. **Prepare a standard emergency information sheet.** It can be filled out quickly and used by spokespersons to provide consistent information to SERC and LEPC. Determine what data your facility will typically provide regarding health risks and medical advice. A plant emergency information sheet is not designed as a compliance document — it is merely a tool to assist your communicators. (See sample in appendix E).
4. **Test the crisis communications plan.** During a drill or exercise, have spokespersons simulate the notification procedure. You may want to involve the media and medical personnel in an exercise to see if your procedures are adequate. Revise your plan, based upon what you learn during the drill, if necessary.

Chemical Inventory Reporting

Section 311: Material Safety Data Sheets
Section 312: Emergency & Hazardous Chemical Inventory Form

What: Under Section 311, Material Safety Data Sheets (MSDS) or a categorized list of MSDS chemicals on site must be submitted. Under the OSHA Hazard Communication Standard, MSDSs must include specific information, including health effects data.

The same facilities must also submit an emergency and hazardous chemical inventory form under Section 312. This form includes estimates of amounts and storage locations of chemicals covered under Section 311.

Where: Information goes to the SERC, the LEPC and the local fire dept.

When: MSDSs or a list of chemicals was due to the appropriate groups October 17, 1987. Chemical inventory forms are due March 1, 1988 and annually thereafter.

What to expect: Questions, questions and more questions. Companies have already received and will continue to receive many questions about MSDSs and chemical inventory forms from fire departments, SERCs and LEPCs that have been inundated with information. These groups face a significant data management challenge, particularly in highly industrialized communities where thousands of MSDSs may have been submitted.

Other questions may be raised about:

- Health effects data included on MSDSs;
- The usefulness of these forms in an emergency;
- Amounts of materials and their hazards;
- Inconsistencies among MSDSs for the same chemical;
- Data gaps or claims of confidential business information on the MSDSs;
- Safe levels of exposure to the MSDS chemical.

Disclosure of MSDS and inventory information also provide the public and the media with significant opportunities to review the data you will be submitting to the LEPC.

Questions may be raised about the toxic release, explosiveness and flammability potential of the hazardous materials used and stored on-site. Citizens may be concerned about the transportation of these materials through their community and about the potential for accidental releases and spills.

The public may specifically request MSDSs and chemical inventory forms. In addition, all submitted information (except specific chemical locations) must be available for public review at a specified location during normal working hours. The LEPC must annually publish a notice in local newspapers of the availability of this information.

You should anticipate at each filing date that local media will review submitted data and report their assessments to the public.

**Chemical Inventory Reporting:
Recommended Communication Activities**

1. **Consider making Section 312 data public before the mandatory March reporting deadline.** Early in 1988, complete and distribute the inventory forms. This will provide you with an opportunity to personally explain the data to the LEPC, SERC, fire department and media prior to the March 1 deadline and to isolate your facility's report from the entire region's information. You should provide additional information about your facility's environmental, health and safety programs.
2. **Activate community and media relations plans.** See Sections 3, 4 and 5 of this workbook for more information.
3. **Follow data submission with personal visits to recipients of the information.** Offer to answer questions, provide background information and interpret the forms.
4. **Talk to your local fire service personnel.** Determine how you can best communicate MSDS and inventory information. Perhaps an electronic storage capability exists and your facility can provide the information on disks, rather than in hard copy. The goal should be to establish an effective data management system that will be useful to the fire department in emergencies and meet the requirements of the law. Note that fire departments may conduct on-site inspections and obtain specific location data on hazardous chemicals. Plan a joint emergency exercise.
5. **Ask for time on the LEPC agenda to review a typical MSDS and explain what it means.** An example of how to discuss MSDSs is included in the appendix of this workbook.
6. **Consider explaining your MSDSs.** A sample "layman's chemical information sheet" is included in the appendix of this workbook. Simplified data sheets can be attached to more technical sheets or may be used alone in communicating with the media or the community. They do not meet OSHA requirements and should not be used as a substitute for existing MSDSs. Discuss the difference between chronic and acute health effects.
7. **Meet with medical personnel in the community to explain MSDSs and health hazards associated with materials and products used and produced at your facility.** One facility manager found a speaking engagement before his local medical association to be an excellent forum for communicating openly with local health professionals.
8. **Get ready to answer tough questions, particularly related to episodic events, their potential impact on the community and the programs you have in place to prevent them.** This handbook contains more specific recommendations on communicating risk to employees, the community and the media. Section 3 contains a list of possible questions and some guidelines for responding to them. Be prepared to answer questions about the long-term health effects of MSDS chemicals, particularly about cancer and reproductive effects.

Release Reporting and Emissions Inventory

Section 313: Toxic chemical release form

- What:** Estimates of amounts of toxic chemicals present, waste treatment or disposal methods and the quantity of chemicals entering the air, land or water.
- Where:** Information must be submitted to EPA and state officials designated by the governor.
- When:** July 1, 1988, reflecting releases during the preceding calendar year and annually thereafter.
- What to expect:** A significant amount of new quantitative data will be available to EPA, designated state agencies and the public. Section 313 gives your community the opportunity to learn about estimated quantities of chemicals routinely or accidentally released.

A national data base to be maintained by EPA will allow anyone to directly access this data about your facility. This includes information about releases that are not covered by permits. The media, the community and public interest groups will have questions about the substances being released into air, land and water and their effects on human health and the environment.

In addition, any person may petition EPA to add or delete chemicals from the list of chemicals covered.

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**Release Reporting and Emissions Inventory:
Recommended Communications Activities**

1. **Activate community and media relations plans NOW.**
2. **Make your employees aware of Section 313 information before it is released publicly.** Consider an internal communications program aimed at informing and educating employees about the facility's emissions, the associated short-term and long-term risks and emission reduction programs. Open the subject up for discussion in small group meetings. Answer questions, address concerns. Employees should be reminded that official outside inquiries about plant operations should be referred to designated spokespersons.
3. **Be prepared for attention from the media and the public.** Train spokespersons and equip them with understandable messages. Have a working knowledge of how to communicate risk.
4. **Be sure you have health-based community exposure standards for the chemicals for which you will report emissions and release data.** CMA has identified several technically valid methods which can be used to evaluate community exposure guidelines.
5. **Take every opportunity to make this information public before the mandatory July 1 deadline.** Look for occasions to discuss health, safety, and emergency response programs and emissions and release data. Explain the potential impacts and health significance involved and what your facility and company are doing to minimize them. Several companies have already met with local media and community leaders to discuss emissions data. Plant managers report that in most cases, after meeting with them, they received balanced media coverage and a fair hearing from the community.
6. **Establish a plant managers' network to share experiences, information and advice.** Gain an understanding of the total emissions in your geographic area. One Texas facility recently reactivated a plant managers' group that had become part of the local CAER group several years ago. Managers decided they needed to discuss industry's approach to Title III information before addressing larger audiences.
7. **Consider a proactive approach to improving air quality.** Consistent with CMA's Air Quality Program guidelines, collect emissions data. Model to determine ambient air quality. Consider other methods, such as monitoring if necessary to obtain additional information. If reasonable community standards are available, or if state and federal standards exist, use as a basis for comparison. Where possible, reduce emissions. Tell the community what you're doing and why.
8. **Address community concerns about releases to land and water, in addition to the air.**

Trade Secrets

Sections 322 & 323: Trade Secrets

What: Specific chemical identity information may be withheld because it is trade secret.

Where: From emergency planning information, MSDSs, chemical inventory forms and toxic chemical release forms.

What to Expect: Questions may be raised about why the information was withheld as a trade secret. Know whether your facility has withheld trade secret information and, if so, for which substances, and why it is deemed confidential.



2. Talking About Risk

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Before you begin a Title III communications program, take some time to learn how to communicate the risks associated with your facility in a meaningful way to your employees, the community and the media.

It's not a simple skill that can be mastered in a day. It involves listening as much as it does talking. One plant manager says risk communication must be home-grown: Local plant managers involved in local dialogue with local folks about local concerns.

Risk communication should be a team effort at each facility. This section provides an overview of the risk communication process and practical guidelines for talking to employees, the media and the community.

How The Public Views Risk

Risk is the probability of something bad happening. Risk assessment is the science of determining those probabilities. Risk management is actions taken to reduce the risk to safe or acceptable levels.

Both risk assessment and risk management rely on sciences of numbers. Risk communication, however, goes well beyond talking about numbers — it must address individual opinions, attitudes and perceptions.

The public, for example, uses many factors in addition to numbers in deciding whether something is risky. That is why communicating risk can be so difficult. We often think facts and numbers of our risk assessments will convince the public to accept risks associated with the chemical industry. Instead, the public generally uses other factors to develop its perceptions and acceptance of the risks involved.

You may be tempted to dismiss the public's "emotional" reactions to the risks associated with your facility or its tendency to disregard numbers in favor of other considerations. But remember: *Although the public perception of risk may not bear much resemblance to risk assessment, when it comes to their accepting the risk, perception is reality.*

Some of the factors influencing the public's perception of risk include:

1. **Voluntary** choices versus **involuntary**. For example, people perceive voluntary risks like driving a car as more acceptable than involuntary risks like breathing emissions from a nearby chemical plant.
2. **Controllable** risks are preferable to **uncontrollable**. For example, a person is in control of the car but not in control of a chemical plant operating in the neighborhood.
3. **Beneficial** is more acceptable than **not beneficial**. Who gets the direct benefits? Chemical products may not be seen as a benefit to someone who lives on the plant fenceline and feels threatened by emissions.

These factors are more important to the public than numbers. Numbers mean little to an individual who believes he or she is being forced to breathe dirty air. There are many more factors that affect the public's perception of risk. Most of them work against us, making our risk communication task much more difficult. But if understood, these factors can be addressed.

For a more detailed discussion of the subject, refer to "Making Risk Comparisons: Suggestions For The Chemical Industry," a booklet available from CMA.

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Some of the most important risk factors for chemical industry communicators involve control. Many arguments about risk are really arguments about power and control in the community. Who decides the acceptability of risk?

People must feel they are participants in the decision-making process. No risk message will be successful if it appears we are trying to force the community to accept us.

Your goal is to *inform* the public and the media. Leave the decision-making up to your audience. *They* will decide if they want to accept information about emissions from your facility and any perceived health risks.

So how do we communicate information the community will accept?
By building trust and credibility.

The most important step in communicating risk is building and maintaining bridges to the community.

This conclusion is based on research done by experts in the risk field and volumes of experience at chemical industry facilities. Comparing the risks of your facility's emissions is important too, but work on the trust and credibility first. And keep working on it — bridges need constant maintenance.

With trust, any honest risk communication has a chance of being accepted by a community. Without trust, there is no chance a message will be accepted by a community.

Successful Risk Communication

Before you begin, know your data. Work with your safety, medical, health and environmental management to analyze and assess relevant plant information. When you have your facts in hand, here are some guidelines for successful risk communication:

1. Personalize the message.

Put things in the audience's perspective, not the chemical industry's. For example, putting individual risk in terms such as "10 to the minus 16," is too technical. *Making Risk Comparisons: Suggestions For The Chemical Industry*, the booklet developed by CMA, contains a number of specific risk comparisons that can be tailored to your facility. There are many ways of talking about health and safety data. A simple approach is always best. For instance, tell your audience:

- About the chemicals you use and manufacture; their hazards and the data you have on emissions; report emissions in quantity (tons) or in concentration (parts per billion, million, etc.) and develop your own comparisons. Risk comparisons should be developed carefully and tested internally before being used outside your company.
- Regardless of how you communicate risk, always include a discussion of what is being done to minimize exposure and hazards. Describe what you are doing to reduce emissions, what recent measurements show and where people can get additional information. Remember, what the public and the media really want to know is: "Am I safe?"
- Explain worker safety and health programs and the measures you take to protect both workers and the community from accidents. Review industrial hygiene and emergency response programs.
- Prepare simplified chemical information sheets (see sample in appendix C) about your products and hazardous materials to use in communicating with the media and the public. Make all communications materials as simple as possible, using common terms and plain language.
- Explain OSHA and EPA standards. Obtain monitoring and modeling information to show that facility and neighborhood exposure are lower than government standards. For example, one Texas facility has determined that community exposure from its emissions is 1,000 times less than the allowable occupational exposure rate.

- Discuss health effects data for employees and the community. Use concrete language. For example, you might explain that data shows that when a certain number of laboratory animals are exposed to an amount of a particular chemical in a certain way, that strain of animal shows "x" response or no response at all. Explain that you are controlling exposure to workers at a level 100 times better than that, and to the public at a level 10 times better than the workers.
- Explain the difference between chronic and acute health effects.
- Coordinate with other chemical facilities and businesses.
- Use visuals — charts, graphs, slides, overheads or videotapes to make your points.

It is useful to have a team work on risk communication projects. Representatives from safety and health, legal, environmental, communications and personnel departments should be included. Industrial hygienists and toxicologists can work with medical doctors to quantify your site's emissions and to develop health messages. One large facility has a team developing site-specific exposure and health effects data for each of its Section 313 reportable substances.

2. Know your audience.

Personalization also means making the information relevant. You need to know your audiences before communicating with them. They will likely be some of the same audiences you communicated with about CAER.

Start by working with employees. One company made employee communications part of the plant manager's quarterly communication meeting. He talked about the division's objective to reduce air emissions, about goals, how the facility was implementing the project and what progress they were making.

If possible, relate your message to a benefit the audience has or will personally receive. Reductions in air emissions could be related to improved ambient air quality, reduced employee exposures, fewer odor problems.

Community surveys, employee questionnaires and media background interviews can help you determine how people feel about the plant, its products and processes. You can pinpoint their concerns and address them.

Risk experts point out that when discussing risk, it's always best to respond to the audience's feelings before addressing substantive matters. "I can tell you're angry about this," won't get rid of the anger, but it will enable you to focus on the issue at hand.

3. **It is usually best to communicate in small groups where you can answer questions one-on-one.**

Avoid large, open community meetings where you may become a target for emotional attacks by disgruntled employees, activist groups or others.

4. **Involve community leaders early in communicating and interpreting data.**

Under Title III, the Local Emergency Planning Committee is an ideal group with which to begin communicating about risks associated with your facility. This audience has a stake in knowing what goes on at the plant and why.

5. **Be conservative.**

Don't promise zero emissions if you can't deliver. And don't be afraid to acknowledge uncertainty. Explain that detection is outrunning control technology. Problems with modeling, measuring, interpreting data, should be discussed in simple terms.

6. **Work with the media.**

The media are key in communicating risk to the community. Cooperative relationships will yield more accurate and balanced interpretation of your data than adversarial arrangements. See Section 4 for more detail about media relations.

7. **Get help.**

Communicating risk is hard work and shouldn't be tackled alone. Each of the activities described in this section requires personnel, time and money. Consider enlisting the assistance of local community authorities — professors, health officials, emergency planning professionals. They can help determine how best to communicate certain issues to the public and may even be willing to participate in your presentations.

8. Take an organized, step-by-step approach to risk communication.

List the necessary activities and begin delegating responsibility for specific projects that include:

- Preparing chemical information sheets
 - Community surveys
 - Employee questionnaires
 - Developing risk comparisons
 - Preparing risk communication visuals
 - Gathering plant data
 - Meeting small groups
 - Media backgrounders
 - Meeting LEPC
- Establishing community exposure standards for emissions
 - Activating waste minimization and air quality programs
 - Identifying health and exposure data gaps
 - Starting a program to fill the data gaps

During the past several years, the chemical industry has adopted an attitude of openness and outreach in plant communities. Through CMA's CAER and Air Quality programs, facility managers throughout the U.S. and abroad have reached out to other businesses and local emergency responders to review and improve co-ordinated emergency response planning.

The community awareness phases of the CAER and Air Quality programs have also been successful in building new bridges to the community. Thousands of people have participated in drills and exercises to test emergency plans and there is a new awareness in plant communities that the chemical industry is concerned about its neighbors.

Strong CAER programs are an excellent foundation upon which to build a solid community relations program—a program that will enable facility managers to openly discuss complicated information with the public and the media.

Title III gives the community a right to data about our processes, our hazards, our emissions and our facilities. Now it's up to us to use this as an opportunity to build on existing relationships in the community—to talk to people with whom we've developed trust and credibility. Those who trust us and take the time to listen can become our strongest supporters in working with the rest of the community.

The time to begin a community relations program is now.

What The Experts Say

There is *proof* that community relations works. Recent scientific survey results show conclusively that companies that are perceived as contributing to and caring about the local community have a much higher acceptance level than inactive facilities. This comes from a report by the Center for Communication Dynamics in Washington, D.C.

The Center has conducted numerous surveys of communities near industrial facilities throughout the country. Its findings show consistently that plants that have invested heavily in strong community relations efforts — including carefully placed community contributions and visibility for significant improvements in the plant's environmental safeguards — have developed public confidence and goodwill.

The surveys typically find that plants that have not previously paid much attention to community relations may have, if not an indifferent or hostile public, a superficial degree of support that lacks the depth needed to weather potential problems.

One theme has appeared in all of these community surveys. People appreciate jobs that the plant brings to the community. Yet jobs alone have not been sufficient to produce an extra measure of understanding and support for the plants.

The center reports that plants receive the ardent backing of the community when:

- residents believe the plant is genuinely concerned about being a good neighbor;
- the plant is seen as doing more than the bare minimum;
- the plant is known to be safety and environmentally conscious beyond just staying inside the law;
- the plant makes frequent and creative contributions to local activities.

The evidence shows that people remember when the plant consistently goes the "extra mile."

It is not a matter of putting up billboards to say the plant made a big donation to the United Way. It is not a matter of press releases or speeches. It is a matter of making a commitment of resources and attitude — to accept more responsibility toward the community and to be more open and informative about the plant's progress toward greater safety and protection of the environment.

What Works

Step 1: Know the Community.

Knowing your community should be the first step in developing a community relations program. Community surveys and other forms of research provide highly useful information for the management team.

Other methods for studying community attitudes include informal small group meetings, focus groups, questionnaires and telephone polls. One large company does regular community surveys to help develop community relations objectives; another uses the information to gauge the level of support for its existing programs.

The strategic benefits of research fall into three broad areas:

- 1. As a current barometer — Survey data shows the nature and intensity of community attitudes toward the plant; it reveals which issues are most damaging and shows the extent to which the plant has been successful in creating a reservoir of goodwill.**
- 2. As a planning tool — By virtue of the "current barometer" you can more effectively develop the strategic focus for community relations. Study findings will target key areas in which community relations efforts should be strengthened and will identify specific kinds of activities which would have the most impact on the community.**
- 3. As a measurement of the effectiveness of community relations activities — a periodic comparison of survey results will indicate which of your activities and expenditures are more effective over time. It can also pinpoint the places, the issues and the audiences that need the most attention.**

Research provides tangible information you can act on. More specifically, well-designed research can answer the following questions:

- **How high is the public profile of the plant?**
- **What does the community see as the strengths and weaknesses of the plant? What criticisms and concerns about the plant are voiced in the community — and therefore deserve special attention in community relations plans?**
- **What are the community's health, safety and environmental concerns? To what degree is the plant seen as making a good faith effort to be responsible?**
- **Is the plant seen as a "good neighbor," doing extra things for the community beyond providing jobs? Which charitable efforts and community involvement efforts are most appreciated?**
- **Are the desired messages — advanced in interviews, press releases, speeches, meetings — getting through the mass media to their intended audience?**
- **Which demographic groups merit specially focused messages?**
- **What are the trends in attitudes toward the plant?**
- **How intensely are attitudes held? How strong are the plant's supporters and how hostile are its critics?**
- **Which groups view themselves at most risk?**

Step 2: Develop the plan.

Once you have a good idea of the concerns, questions, attitudes and needs of the local community, you can begin listing ways to answer questions, meet needs and address concerns. One Texas facility came up with a list of 33 community outreach activities related to Title III.

Remember that various segments of your community have real or perceived different needs and you will have to customize your program to effectively address the concerns of each. Audiences to consider include:

- | | |
|------------------------------|-------------------------------|
| ♦ elected officials | ♦ schools and school board |
| ♦ fire fighters | ♦ police |
| ♦ public interest groups | ♦ medical/first aid personnel |
| ♦ professional organizations | ♦ service organizations |
| ♦ businesses | ♦ customers |
| ♦ neighbors | ♦ media |
| ♦ religious groups | |

Here are some components of successful community relations programs for some U.S. chemical facilities:

1. ***Plant information packages*** — These vary in format from booklets to brochures to folders with inserts. Some include photos and small product samples. These packages can lead a double life as media information kits for emergency briefings. A list of what should be included is on page 6 of this workbook. (See appendix E for a sample information sheet.)
2. ***Plant videotape or slide show*** — This should be brief, no longer than 15 minutes. It may include pictures of your processes, your employees, your facilities, etc. Several plants have successfully used local newsmen in their videotapes on emergency planning for the community. You may want to produce a community right-to-know tape that outlines Title III and provides your facility's emissions data along with explanations of environmental controls, pictures of measurement and monitoring devices.
3. ***Recycling days*** — Several CMA member companies have successfully sponsored household waste recycling days. Local waste disposal firms frequently cosponsor the events along with the League of Women Voters, the Rotary or other groups. Recycling days heighten the public's awareness of household chemicals and the problems associated with disposal.

4. **Hotlines** — A number of facilities have installed hotlines that employees and the general public can call for information about chemicals and plant operations. Statistics point to the need for sources of chemical information. In fact, CMA's Chemical Referral Center receives the majority of its calls from industry workers who want to know more about the substances they are working with. Some companies operate these with a taped message machine, others use personnel to take calls.
5. **Plant tours and open houses** — These have been a popular plant activity for employees and their families for years, but in the past several years they have been expanded to include invitations to the public. One company advertised on TV "Have lunch at a chemical plant." It is wise to invite small groups to your facility, particularly if you anticipate a less-than-friendly attitude from a group. Encourage employees to become part of planning and conducting tours.
6. **Yellow pages information** — Communities in Baltimore and West Virginia now have chemical emergency response information in their phone books, thanks to the efforts of local CAER groups. Companies list neighborhood warning and evacuation procedures. (See appendix H for example.)
7. **Neighborhood meetings** — Whether you call them coffee klatches, information sessions or plant nights, getting together informally with the local neighbors is good business. One chemical facility manager talked recently about spending more time in kitchens than in his plant.
8. **Government visits** — Local and state elected officials will be the first to hear from disgruntled citizens when your Section 313 data is released. It pays to let them know what's coming. Invite them to the plant and schedule a presentation by the plant manager.
9. **Community involvement** -- Many facility managers are active in community groups such as the PTA, Salvation Army, and the United Way. Being an active member of the community who is concerned about community programs builds personal credibility that may be needed when talking with member of the community and the local media.
10. **Educational involvement** — Many chemical facilities find that participating in local educational programs benefits the company as well as the students. Speakers programs, science fairs, plant internships, teachers' days have all been used successfully.

11. ***Grants to community*** — Everyone wins when the chemical industry funds community projects such as donations to community groups, libraries, hospitals or college scholarships.
12. ***Community newsletter*** — Many facilities publish a brief newsletter for the local community featuring news about the plant and the company. Some companies have developed community newsletters specifically to communicate about a Superfund cleanup. If you don't have the personnel on site, you can contract a local public relations or communications consulting firm to provide assistance. You can organize with other local chemical industry representatives to produce a joint newsletter "News From Your Chemical Plant Neighbors."
13. ***Product end use presentations*** — Several companies have developed speaker presentations about their end products. The presentations include samples of process materials and products. Slides, videotapes and photos are often used.
14. ***A column in the local newspaper*** — Some facilities work with local newspapers on a regular basis to provide news and features from the plant. An editor might consider establishing a monthly feature column devoted to LEPC or local business news.

Likely Questions From the Community

When you reach out and communicate with the community on Title III subjects, you are likely to receive a multitude of difficult and unexpected questions. But don't advise that any facility manager call an open community meeting. You are opening yourself up to an uncontrolled situation that could potentially turn hostile. Instead, try to arrange meetings with small groups. Have planned remarks and visual aids if necessary. Anticipate answering difficult questions ahead of time. Perhaps role-playing with a member of the plant staff will help.

A few guidelines:

- Never feel obligated to answer a question you don't fully know the answer to or understand. Say "I don't know" and get back to the questioner as soon as possible.
- Don't repeat negative allegations against your company or yourself. Say "no" and go on to explain why not.
- Remember the purpose of your meeting, speech or interview. Stick to the messages you want to convey. Try to satisfy the questioner and the audience, but retain control.
- Whenever possible, relate your answer to your presentation.
- Speak in simple terms. Avoid jargon and technical terms.
- Seek corporate legal, health and safety, environmental and public affairs advice before getting involved in a media or community question and answer session.
- Do your homework. Stay calm.

Challenging Questions

The following are typical of questions you may be asked. You should develop your own list, based on the concerns of your community. In many cases, it will be appropriate to seek the input of your communications and legal departments in developing answers.

Environmental Issues

1. *Where do all these emissions end up? Where does all the hazardous waste go? Into air, land, water?*
2. *What type of ongoing fence-line monitoring operations do you have in place, and what are you doing to improve your detection program?*
3. *What is the effect of introducing all of these man-made chemicals into the environment?*
4. *How will I be notified in a chemical emergency?*

Business Issues

1. *How much would it cost to reduce emissions of chemical X to zero at the plant? Why don't you spend the money to do this?*
2. *How much money does your company make each year from the sale of the chemical(s) being emitted? From the sale of end products which result?*
3. *Can't you substitute some of the hazardous chemicals you use or make with others that are not hazardous?*
4. *Why don't you move your plant to a safer location, some place away from population centers?*
5. *Why don't you reduce emissions?*

Legal/Statutory Issues

1. *Why haven't your company and others publicized emission data before the law made you do it?*
2. *How many times in the past year has your plant exceeded your permit limits on chemical X?*
3. *How many times in the past year has your plant been fined for permit violations? How much were the fines?*
4. *Why are you just now telling us the truth about your operations; why did it take you so long?*

Health & Safety Issues

1. ***What's the cancer incidence rate among employees at your plant? What's the most common form of cancer found among chemical plant workers?***
2. ***If your chemicals are so safe, why do most of your employees and their families live so far away from the plant?***
3. ***What have you done to ensure that your plant doesn't create a major tragedy by releasing deadly chemicals that will spill and injure hundreds or thousands of people in the neighborhood? And don't tell me the chances of this happening are low. Tell me what you've done to guarantee it doesn't happen.***
4. ***What are the "safe" levels of this chemical?***
5. ***How do you know it is safe?***
6. ***How do you know what the level is?***
Note: Answer may be "educated guess" in the absence of monitoring program. This could generate more difficult questions: You guess! What are you doing to get a more accurate answer?
7. ***The levels represent average expectations! How do we know that your equipment is typical of the average or is maintained to meet that average? Is there a testing program to ensure this? If so, what are the details of the program — test method, frequency, who performs test?***
8. ***Suppose you have an accidental release, does your average go up? If not, why not?***
9. ***What are you doing to stop the leaking?***
10. ***When can we expect you to stop it?***
11. ***What long-term health effects can be expected from low level exposure to chemicals coming from your plant?***
12. ***What is the combined effect of low-level exposure to a multitude of chemicals?***
13. ***Why is the quantity of emissions from a chemical plant and/or a combination of plants so high?***
14. ***What is the health impact of your chemical plant emissions combined with all the emissions from the other chemical plants?***
15. ***What is the no-risk or safe level for long-term exposure?***
16. ***What is the effect of exposure on children?***
17. ***Will my ability to have children be affected by your chemical emissions?***

- 
18. *Do your products/emissions cause cancer?*
 19. *What chemicals are shipped in and out of the plant? What routes are used? Trucks or train cars? Can they be better routed to lower risk of accident?*

Public Policy Issues

1. *Why should the public allow you to continue to operate in view of the health and environmental hazards you create?*
2. *Why can't you run your business so that it's not a threat to society?*
3. *Why shouldn't the government tax your hazardous emissions by the ton to give your plant some incentive to clean up your act?*
4. *Can't you deodorize the chemicals you spew into the sky so at least they wouldn't stink?*
5. *Why does a chemical plant have the right to expose me to chemicals against my will?*
6. *Your plant should be required to pay for lowered property values and medical care related to health problems because of your emissions.*
7. *What is your company going to do to help organize and make accessible all the information you provided to the LEPC?*

This section covers the basics of good media relations. Title III reporting requirements will generate a large amount of previously unreported data guaranteed to attract media attention.

By working with reporters before the March and July reporting deadlines, you can minimize the chances of negative and inaccurate reporting. You should plan to meet with newsmen before the data is released publicly to put it in perspective.

Even if you take proactive steps, you'll probably be called for an interview when the data is reported. These guidelines should help you prepare for media interviews. While they pertain to media relations, the suggestions apply to working with other audiences too.

Getting Balanced News Coverage

Media relations, like community relations, cannot be initiated after you have a problem. Next July — when several plants in your community simultaneously report large quantities of hazardous chemical emissions — is too late to begin developing a relationship with local newsmen or to start explaining the meaning of permits. Understand and be prepared for the fact that local media may interpret your Title III information as a serious community problem.

They have a job to do and can't wait while you explain that you are really a responsible manager with excellent programs in place.

Developing good working relationships with media that cover your plant is not a magical process but rather one that requires time and effort. Selection of a spokesperson or media contact person is very important.

Your representative should be someone who understands your operation and the needs of various media, is articulate and able to put complex information into more understandable terms. Above all, the spokesperson must be someone who has your confidence so he or she can speak for the organization without confirming every word.

Good relationships with the press and broadcast reporters pay the same kind of dividends that well-nurtured community relations can bring. If you have established yourself as open and responsive and have tried to bring the whole story to the media, you will stand a better chance of receiving fair treatment. If members of the media know who you are, how to reach you or your spokesperson and have received credible, useful information in the past, you will earn the media's respect and trust.

Some things to remember when working with the media:

1. Prepare

Decide well in advance who will serve as local spokesperson. This person should serve the same role in all contacts with the media so as to be a familiar and trusted voice. If possible, get the person professionally trained in communicating key messages.

Inventory the media in your community. Create a list of local newspapers, television and radio stations and those in the wider geographic area, especially the state's largest circulation newspaper (or newspapers in the state capital) and leading broadcast outlets. Remember to include wire service bureaus, correspondents, weekly newspapers and public broadcasting stations. If you are located in an academic community, the local university press may also have an interest in Title III issues.

A

Find out which reporters are most likely to be interested in stories related to Title III. Environmental, science, business, government and general assignment reporters will probably handle these issues. Make a list of the people you'll need to contact at each office. Don't overlook editorial writers and editorial page editors, as well as editorial directors at local TV stations.

Assemble the basic facts about your inventory and emissions in language that "outsiders" can understand. Prepare plain English explanations of emissions, inventories, health effects, monitoring, modeling, etc. Include plant diagrams, black and white photos and/or video cuts. Prepare written information describing how the products are used.

2. Get your message out.

In February, arrange meetings with members of the media. Start with newspapers, because in many towns, television takes its news lead from the print media.

Ask reporters, editorial writers, key editors or news directors to meet with you at the plant or their office to discuss information that you will be reporting to EPA and local officials. You may want to embargo the information — that is, provide the information on agreement that it will not be reported until a specific date, e.g., several days or a week after your interview. This leaves enough time to meet personally with reporters and editors from other media outlets.

Set aside time to get to every key newspaper, TV and radio station. You should consider whether it is appropriate to do this in conjunction with other facilities in your area. Some facilities may prefer to present their data separately and to explain their company programs in detail. You may also want to work through the chemical industry state organization in organizing media visits on Title III.

Personal contacts are always better than press releases. Press conferences with groups of reporters encourage competition and don't provide enough time for each reporter to ask questions. Individual meetings will take more of your time, but they also offer the best opportunity for putting Title III information into the proper context.

3. Be available.

The media will probably have many questions about the information you are communicating. Be prepared. Use the challenging questions section of this workbook to help prepare answers to their questions. Return calls promptly. Deadlines are sacred in the news business.

4. Develop a contingency plan.

Have a strategy for dealing with negative or inaccurate news coverage. Decide whether to respond with letters to the editor or phone calls.

Plan to use the same media spokesperson who has built relationships with the press. Don't change horses for Title III interviews or follow-up calls. Make sure employees know that media calls should be referred to the spokesperson.

Equip your spokesperson with information in a form that can be distributed. This should include available MSDSs and simplified chemical information sheets (see appendix for example).

Select a location to serve as a press center during plant tours and press conferences. Consider access to telephones and other services.

5. When media calls come, follow your plan.

Log all inquiries as they come in and make notes on the questions and your answers.

Consult your corporate Legal and Public Affairs counsel if you are unsure how to handle media inquiries or if reporters begin taking an "investigative" approach to your information.

Consult the "Spokesperson DOs and DON'Ts" in appendix F of this workbook.

Be sure you have the name and affiliation of media callers so you can make follow-up calls.

Be as open and forthcoming as possible with the media but have a back-up support system at the corporate level.

6. Some useful generalities

Most reporters are intelligent, but you should not expect them to understand the intricacies of business or chemical processing. Keep explanations simple, factual and non-technical. Analogies are helpful.

Never speculate, even when asked by a reporter what might occur. Don't answer hypothetical questions.

Don't be afraid to tell a reporter that you don't know the answer. Tell the reporter that you will find the answer, and be sure to get back later.

Reporters do not really expect you to tell them everything you know, but they will sometimes push, hoping you will go further. Be open and cooperative but don't give away the store.

Assume that everything you say is on the record.

Above all, treat reporters with courtesy and respect. There will be difficult times, but nothing is gained by appearing "hard."

7. Select a Single Effective Spokesperson.

A principal spokesperson and alternate should be designated in advance. The company should speak with only one voice. Perhaps the greatest danger to a company's image and credibility is issuing conflicting messages from different parts of the organization.

At Three Mile Island, much panic and needless negative news resulted from conflicting messages being given to the press by company personnel at the site and others back in Washington.

All telephone operators and staff should be firmly instructed to refer *all* questions and inquiries *only* to the designated spokespersons.

A detailed set of guidelines for spokespersons is included in Appendix F of this workbook.

Characteristics of ideal spokespersons include:

- common sense
- stamina
- composure and tact
- seniority in organization
- knowledge and credibility
- ability to translate technical information effectively into layman's terms

Guidelines for Community Initiating
January - June, 1988

The "window of opportunity" for communicating data required under SARA Title III is wide open. Chemical facilities can initiate a number of activities that will help lay the groundwork for presenting complex inventory and emissions data to employees, the media and the community. The time to begin communicating is NOW.

This section contains suggested activities for each month, but it is not a comprehensive list of what to do. Additional activities are recommended throughout this workbook and in community awareness sections of CMA's CAER and Air Quality program handbooks.

January, 1988

This month you are laying the groundwork for more detailed communication about inventories and emissions later.

Employees: Begin an information program on SARA Title III. Use the employee newsletter or video program to explain the emergency planning portions of the law (Sections 301-303). You might want to include an interview with your facility's representative to the Local Emergency Planning Committee.

You should also audit your internal environmental and medical data to determine what other information is needed.

Tell them what information is being developed, how, why and when it will be available to the public.

Media: Prepare a plant information kit for distribution to the media. Include information listed on page 6 of this workbook and any other pertinent information.

Community: This is the time to work with the local fire department if you haven't already. Your Material Safety Data Sheets should have been submitted to fire departments last October. Determine with your local fire officials how the MSDS information is being maintained. Perhaps electronic storage capability is available. The goal should be to help establish an effective data management system that will be useful to fire personnel in emergencies.

You may also want to simplify your MSDS. A sample "layman's chemical information sheet" is included in appendix C of this workbook. These can be attached to the more technical MSDS or may be used alone in communicating with the media or the community. However, simplified chemical information sheets do not substitute for MSDS under the law.

This is also an excellent time for coordinating your activities with other businesses and plants in the area.

February, 1988

This month you should begin communicating the Section 312 information that you'll report in March on the Emergency and Hazardous Chemical Inventory form. The media may report your voluntary release of the information publicly in February, thereby making it a "non-story" on March 1.

By releasing the information early, you have an opportunity to communicate the information in the format you want and to answer questions directly. You maintain control of the situation.

Employees: Continue education/information program on Title III. Concentrate on emergency notification requirements (Section 304) and chemical inventory reporting (Section 312). Employees should be the first to know what will be released to state agencies and the LEPC in March. Tell them what is stored on site and the hazards involved. Solicit their help in working with community groups that request speakers. Don't forget to inform pensioners about the law.

Review site and community emergency response plans. Use safety meetings as a forum for communicating the information.

Media: Meet with reporters to discuss chemical inventory information. Bring photos of the plant, showing storage areas. If appropriate, volunteer to take reporters on a tour of your plant.

Prepare short videotape or slide show explaining plant processes, safety and health programs, waste disposal, etc. Also shoot video of inside of plant to provide as background to local television stations. Don't distribute yet.

Community: Take a leadership role on the Local Emergency Planning Committee. EPA has emphasized the need for direct participation from industry — it's a facility manager's responsibility to explain the hazards of local industry, the programs in place to deal with those hazards and to help determine what else needs to be done. Ask the LEPC for time to explain your Section 312 inventory report — how much, where it's stored, the hazards and the safety precautions.

Conduct or commission a community attitude/opinion survey to determine what members of the community know about your plant and what they think of it.

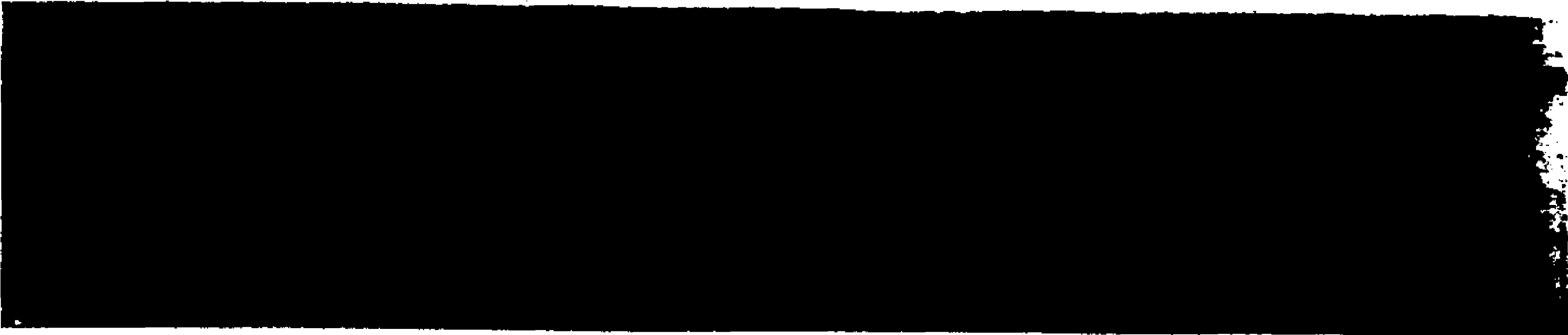
March, 1988

This month, you're likely to begin receiving community and media attention, now that inventory data has been reported. Be prepared to respond to questions, but don't forget that emissions data reporting is just around the corner.

Employees: Continue education/information program on Title III. This month, provide employees with emissions data that you will report under the toxic chemical reporting and emission inventory (Section 313). You may want to hold small group meetings to discuss this information and to inform employees that it will be released to the media and community soon. Industrial hygienists, toxicologists and health professionals could be called in to discuss potential health effects, employees health records, monitoring programs, etc.

Media: Select and train site spokespersons. These individuals should be professionally trained to deal with the media and the community at community meetings, in emergency situations and in interviews. They should understand risk communication principles.

Community: Prepare a community right-to-know information brochure describing the hazardous materials at your site and how they are handled. Explain site emergency plan and notification procedures.



Appendices

- A. Resources
- B. What Is An MSDS?
- C. Chemical Information Sheet
- D. Emergency Information
Report
- E. Plant Information Sheets
- F. Spokesperson Do's and
Don'ts
- G. Crisis Communications Plan
- H. Yellow Pages
Advertisement

June, 1988

This is your final opportunity to voluntarily release emissions data and to discuss emission reduction programs, permits, etc.

Employees: Hold small group meetings with employees to discuss the negative publicity Section 313 data may generate in early July. Answer questions. Consider establishing a hotline or question box where employees can submit questions anonymously.

Media: With local CAER group, hold an emergency exercise and invite the media to participate in simulated public notification.

If you have developed a good working relationship with the local media, consider asking for a meeting with the editorial board of the newspaper. Consult your company's public affairs professionals before embarking on editorial board visits.

Community: Make school presentations and sponsor exhibits at local educational forums. Look for opportunities to participate in large business meetings like Chamber of Commerce conventions. Use your plant videotape and written materials. Discuss community right-to-know and what your facility is doing about it.

JULY AND BEYOND

Title III communications efforts should not end in July. It is an ongoing process that requires continual efforts to communicate with employees, the media and the community.

Appendix A: Resources

Title III

A Manager's Guide to Title III

75-pages plus appendices in a three-ring binder; summarizes SARA Title III and practical approaches to compliance and community awareness; \$25

Available from CMA, Publications Fulfillment.

"Understanding Title III: Emergency Planning & Community Right-to-Know"

15-minute video explaining major provisions of the law; compliance-oriented; \$45

Available from CMA, Publications Fulfillment.

Other materials in the works include a community brochure, videotapes.

EPA Title III hotline: 1-800-535-0202

Risk Communication

Explaining Environmental Risk

25-page booklet on risk communication written by Dr. Peter Sandman of Rutgers University. free

Available from CMA or U.S. EPA Office of Toxic Substances, Washington, D.C. 20460.

"Talk About Risk"

15-minute videotape outlining steps to successful risk communication. \$45

Available from CMA, Publications Fulfillment.

Risk Communication Guide

Guidelines for effective risk communication are provided in the Air Quality Program Implementation Resource Handbook and in the appendix to the Manager's Guide to Title III.

Available from CMA, Publications Fulfillment.

Making Risk Comparisons: Suggestions for the Chemical Industry

Booklet developed by risk communication experts and chemical industry representatives provides practical guidelines and examples of how to communicate risk to the community. Available from CMA, Publications Fulfillment.

Emergency Planning

Community Awareness & Emergency Response Program

A number of videotapes and print materials have been developed to assist facilities and communities in coordinated emergency response planning. These resources are listed in a brochure/order form available from CMA, Publications Fulfillment.

CAER Newsletter

Monthly newsletter features success stories, tips on how to work with groups, resource information, status reports about CAER. free
Available from CMA.

National Chemical Response and Information Center

Four programs are specifically aimed at responding to hazardous materials transportation emergencies and to providing chemical information. CHEMTREC, CHEMNET, the Chemical Referral Center and Emergency Response Training Programs each offer videotapes and publications for sale and on loan to CMA members and to emergency response groups. Write to CMA for a list of 15 audiovisual training programs available.

Site Emergency Response Planning Handbook

A technical look at options for facility emergency response planning.
\$7.50
Available from CMA, Publications Fulfillment.

Community Emergency Response Exercise Handbook

Plans for community exercise programs. \$7.50
Available from CMA, Publications Fulfillment.

Emergency Warning Systems Guidebook

Generic advice on types of warning systems available and guidelines for selecting a system. Compiled by industry representatives experienced in designing and implementing emergency warning systems and reviewed and approved by FEMA and EPA.
Available from CMA, Publications Fulfillment.

Hazardous Materials Emergency Planning Guide

A government guide to emergency planning. Write for NRT-1; National Response Team, G-WER/12, 2100 2nd St., S.W., Washington, D.C. 20593.

Hazardous Materials Emergency Response Guidebook

A Department of Transportation guide to emergency planning. Write for DOT-P-5800.3; U. S. Department of Transportation, Research and Special Programs Administration, Materials Transportation Bureau, Washington, D.C.

Appendix B:

What is an MSDS?

[Sample for Plant Adaptation]

This paper was prepared to explain what Material Safety Data Sheets are and what information they contain. We would be pleased to talk to you about any questions you may have regarding the safety of the chemicals we use in our plant.

Material Safety Data Sheets (MSDSs) are prepared by manufacturers to accompany containers of hazardous chemicals.

An MSDS contains information on the chemical such as:

- ♦ **the chemical name and common name;**
- ♦ **known hazards;**
- ♦ **emergency and first aid procedures.**

The information in the MSDS educates employees about the hazardous chemicals they work with. Manufacturers and employers are required to have MSDSs available to employees.

The MSDS includes exposure information, that is, the risks to the employee's health of coming into contact with the hazardous chemical. For example, the MSDS warns if the chemical can cause an immediate effect, like a burn, or a delayed effect.

The MSDS also includes information on physical hazards, like flammability. Statements of flammability on the MSDS are already reported to your local fire department as required by another federal law. Many materials are flammable, like lighter fluid, but if used safely, they pose little hazard. Statements about other physical hazards also appear on the MSDS.

Some MSDSs recommend controls, like a respirator or ventilation. These controls are safeguards and may be necessary in the plant to protect employees.

Certain information about a chemical may not be available to people outside the company. This information about a chemical is called a trade secret, and may not appear on the MSDS. Even though this information is not on the MSDS, the MSDS still includes the first aid and warning information. Your physician can also contact us for more information if it is necessary for a medical purpose.

For more information:

[Insert plant contact person's name and telephone here]

CHEMICAL INFORMATION
(nontechnical)**PRODUCT:** ABC**What is it?**

ABC is a clear, colorless liquid with an aromatic odor. It is used as a basic petrochemical building block in the manufacture of products such as plastics, rubber and synthetic fibers. ABG is also used as a component of gasoline.

How is it stored?

ABC is produced at Exxon's chemical plant in Baton Rouge, La. More than 700,000 pounds of this flammable chemical is typically on site in cone roof tanks kept at atmospheric pressure.

Effects of exposure

The standard threshold limit value (TLV) for ABC is 10 parts per million. This is the airborne concentration to which nearly all healthy workers may be exposed day after day without adverse effects. Exposure at Baton Rouge is always more than ten times below the threshold level.

Accidental overexposure

Long-term exposure to ABC has been identified with carcinogenic effects. Overwhelming exposure may lead to convulsions, blood system disorder, paralysis, loss of consciousness and even death due to respiratory collapse.

High vapor or mist concentrations will irritate the eyes and respiratory tract, are anesthetic and may cause headaches, dizziness or other central nervous system effects. Direct contact with liquid benzene will irritate the eyes but does not injure eye tissue. Occasional, brief contact will not irritate skin unless evaporation is

impeded. However, frequent or prolonged contact may irritate the skin and cause dermatitis. Small amounts of the liquid aspirated into the respiratory system during ingestion or from vomiting may cause bronchiopneumonia or an accumulation of fluid in the lungs.

Medical attention for overexposure

If someone is overcome by vapors or mists, use self-contained breathing equipment and remove the victim from exposure. Administer artificial respiration if breathing has stopped. Keep person at rest and seek prompt medical attention. Also get medical aid if dizziness or respiratory problems occur.

If eye contact occurs, flush eyes with large amounts of water for at least 15 minutes or until irritation subsides. If irritation persists, get medical help.

In case of skin contact, wash with soap (if available) and large amounts of water. Remove grossly contaminated clothing, including shoes, and wash before reuse.

If ABC is swallowed, DO NOT induce vomiting. Keep at rest and get prompt medical attention.

Emergency response

If a chemical release poses a threat, a trained emergency team at the plant immediately reports to the scene to contain the release. A rescue squad, a medical squad and a fire brigade may also be activated. In addition, an emergency response organization will notify appropriate authorities who will deal with potential medical problems outside the plant.

For more information, phone

EMERGENCY INFORMATION REPORT

DATE _____

TIME _____

4

Change
From
Previous
Report

[] First Report
[] Follow-Up Report

APPENDIX D

[] • Product Involved _____
- Product Information Sheet Attached Yes () No ()

[] • Incident Details _____

- Date/Time _____

- Location _____

- Injuries _____

- Nature of Incident _____

- Agencies Contacted _____

[] • Current Status _____

[] • Personnel Notified _____

[] • Site Response Handled By _____

[] • Primary City/Agency Contacts _____

[] • Presence On Site _____

[] • Additional Remarks _____

Acme Chemicals, Inc. -- Facts You Should Know

Acme Chemicals has a proven record of community concern and environmental responsibility. Acme does things right and searches constantly for ways to do things better. Acme is the largest employer in Sunnyville with 525 employees. The company's annual payroll is \$10 million, of which 65 percent is spent in the immediate Sunnyville area.

The Acme plant covers 475 acres and is the largest single payer of local property taxes with payments of more than \$225,000 per year.

The plant produces 5,000 tons per year of Acmetone, the raw material for making a variety of childrens plastic toys, including rocking horses, snow sleds, and beach balls. Acme Chemicals purchases an estimated \$2.3 million in goods and services from Sunnyville merchants each year. These expenditures range from a caterer who serves the employee cafeteria to a paving contractor who maintains the plant parking lot.

Acme employees in 1986 contributed \$55,000 to the Sunnyville Community Chest -- a figure matched by the company for a total contribution of \$110,000. Acme Chemicals is the sponsor of the state champion Sunnyville Spartan Little League Baseball team and Sunnyville Students for Science.

In its manufacturing processes, Acme's plant emits small amounts of potentially toxic chemicals into the air. The amounts emitted are well below the levels deemed safe by the EPA and OSHA, and Acme has an active program to further reduce emissions.

Acme is proud of its health and safety record. The plant's accident rate is half the industry average. An emergency plant to handle accidental chemical spills or fires has been developed with local officials, although Acme's extensive prevention program is designed to avert such difficulties. Acme has the largest and best-equipped fire department in the state -- but has yet to use it except to aid other companies and the community.

Acme and its employees believe in Sunnyville. Acme workers serve on the Sunnyville Volunteer Fire Department, Delores Sunny Chapter of the League of Women Voters, Kiwanis, Jaycees, Lions, and the Greater Sunnyville Chamber of Commerce.

Acme Chemicals is the recipient of the 1985 Sen. Bifold Award for Quality, the only Sunnyville firm so honored.

PLANT INFORMATION SURVEY

Number of direct employees? 950

Number of indirect employees? 400

Annual plant payroll? \$60 million

Annual local taxes? \$9 million
(Property Tax = \$7.1 million, Sales Tax = 1.6 million)

Annual purchase of goods, services, etc., from local merchants?
\$ 50 million in _____ Area

Plant occupies how many acres? 550 acres

Plant produces how many pounds of products annually? 4.5 billion

Annual operating/manufacturing cost? \$800 million to \$1 billion
(Operating cost = \$250 million, Raw Material = \$585 million)

Types/sources of feedstocks? _____ Refinery

Specific plant products and their end uses? Products and Their End Uses

<u>Polypropylene</u>		<u>Linear Paraffins</u>
Battery Cases	Molded Goods	Biodegradable Detergents
Carpet Fiber	Baler & Tying Twines	Aluminum Roll Oil
Upholstery Fabric	High Clarity Films	
Carpet Backing Fabric		
<u>Butyl & Vistanex Rubber</u>		<u>Paraxylene</u>
Innertubes	Auto Body Mounts	Polyester Fabric
Tires	Wire & Cable Insulation	Plastic Bottles
Chewing Gum	Caulks, Other Moisture Barriers	
Adhesives	Food Packaging Materials	
<u>Benzene, Orthoxylene, Propylene, Butene-1</u>		<u>Polybutene</u>
Raw Materials for Chemicals & Plastics Industries		Oil Additives
<u>Methyl Tertiary Butyl Ether (MTBE)</u>		<u>Isobutylene</u>
Gasoline Additive		Butyl Rubber
		<u>Solvents</u>
		Surface Coating
		Ink
		Pharmaceuticals

PLANT INFORMATION SURVEY - 2

Plant has been operating since (year)? 1940

New facilities added since 1980, and their total cost? \$450 M
BPU, PBU, IAU, PCUX, BAPP

Unions representing plant employees? Four unions represent
Chemical Plant employees: The Gulf Coast Industrial Workers Union, the
Employees Federation, the International Brotherhood of Electrical
Workers, and the International Association of Machinists.

How are plant products shipped? Pipeline, Truck, Rail, Barges

How many hours worked since last on-the-job disabling injury at plant?
13.8 Million

DO's and DON'Ts for Spokespersons

The following list contains a checklist of DO's and DON'Ts to review before you agree to an interview.

- | | |
|---|---|
| 1. DO ask who will be asking the questions. | DON'T tell the news organization which reporter you prefer to work with. |
| 2. DO ask which topics they want to cover. | DON'T ask for specific questions in advance. |
| 3. DO caution them that you are not the right person to interview if there are topics you cannot discuss (due to lack of knowledge, litigation, trade secrets, etc.) | DON'T insist that they promise not to ask about certain subjects. |
| 4. DO ask how long the interview will be and what the format will be. | DON'T demand that your remarks not be edited. |
| 5. DO ask who else will be interviewed. | DON'T insist the reporter not interview an adversary. |

Prior to interview/news conference:

- | | |
|--|--|
| 1. DO obtain accurate information and be completely honest. | DON'T try to fool the reporters and the public. |
| 2. DO decide what you want to say, and check to make sure you have the appropriate information. | DON'T believe you know it all. |

3. **DO** review subjects you do not want to address.
4. **DO** prepare for likely questions.
5. **DO** organize information into key points and key messages.
6. **DO** practice.
7. **DO** critique practice sessions and revise your approach as needed. Use non-technical people as your audience.

After press arrives, before Q & A:

1. **DO** assume that everything is on the record.
2. **DO** review with reporters topics you cannot comment on (if appropriate and if decided in advance).
3. **DO** offer to obtain additional information for the reporters, so you can gauge their interests.
4. **DO** stress your interest in getting accurate information for reporters.
5. **DO** be cordial.
6. **DO** be professional.

DONT figure you can wing it.

DONT expect that you can evade all tough questions.

DONT memorize standard answers.

DONT rely on your glibness.

DONT rehearse until all spontaneity is lost.

DONT seek to go off the record.

DONT insist that reporter not raise any embarrassing topics.

DONT demand to know in advance which questions they will ask.

DONT threaten lawsuits or withdrawal of ads if the story is inaccurate.

DONT crack jokes.

DONT try to butter up reporters with compliments.

During the Q & A:

1. **DO** be honest and accurate.
Your credibility depends on it.

DON'T lie.

2. **DO** stick to your key points.

DON'T improvise.

3. **DO** lead. Take charge.

DON'T react passively, but
DON'T be overly aggressive
or rude either.

4. **DO** raise your key messages.

DON'T dwell on negative
allegations.

5. **DO** offer to find out information you don't have if a question is raised about it.

DON'T guess, because if you
are wrong your credibility
will be shot.

6. **DO** explain the subject.

DON'T use jargon.

7. **DO** stress the facts.

DON'T discuss hypothetical
questions.

8. **DO** explain the context.

DON'T assume the facts
speak for themselves.

9. **DO** be forthcoming.

DON'T decide to reveal
something that is confidential
without considering its
implications.

10. **DO** give a reason if you
can't talk about a subject.

DON'T dismiss a question
with "No comment."

11. **DO** state your points
emphatically.

DON'T ask reporters for
their opinions.

12. **DO** correct big mistakes by stating that you didn't give an adequate answer and you would like a chance to clear up the confusion.

13. **DO** remember the media are interested in "what?, when?, where?, who?, how? and why?"

14. **DO** stress any heroic efforts by individual employees.

15. **DO** emphasize what is being done to correct problems.

16. **DO** state your conclusions first, to get your main points across, then back them up with facts.

17. **DO** have available information relating to company processes, raw materials, and chemical intermediates.

18. **DO** try to be as open with the media as possible.

DONT demand that a botched answer not be used.

DONT be afraid to say that you don't have the answers to who? how? or why? at the present time.

DONT stress any individual errors or negligence.

DONT estimate monetary damages, costs to the company, insurance coverage or level of interference with company activities.

DONT let your message get lost in a morass of detail.

DONT hesitate to refuse to give proprietary information.

DONT give one reporter exclusive information.

After the Q & A:

1. **DO** remember, what you say is still on the record.

2. **DO** remember, it's *all* on the record.

DONT assume the interview/conference is over.

DONT insist that some comment now be put "off the record."

- | | |
|--|--|
| 3. DO be careful around microphones and taperecorders. | DONT assume that a microphone is ever off. |
| 4. DO correct any mistakes you made in the Q&A. | DONT let sleeping dogs lie. |
| 5. DO volunteer to get additional information reporters need. | DONT refuse to talk any further with reporters. |
| 6. DO tell reporters to telephone if they have any questions about something you said. | DONT ask, "How did I do?" |
| 7. DO volunteer to be available if a reporter wants to go over with you. | DONT ask a reporter to show you a copy of the story in advance of publication or broadcast so you can correct it. |
| 8. DO call reporters if stories appear that are inaccurate, and politely point out what is wrong. | DONT call the reporter's boss to complain without first speaking to the reporter. |

Five Most Frequent Interview Failures

1. **Failure to take charge:** The spokesperson must be a leader. His/her role is not just there to answer questions, but to disseminate information.
2. **Failure to anticipate questions:** Don't just concentrate on assembling the factual details. Prepare for obvious questions. Remember, the public wants to know "Is it safe?"
3. **Failure to develop key messages:** This is your opportunity to communicate with the public. Make sure you can take advantage of it by have your organization's message prepared and ready for use.
4. **Failure to stick to the facts:** Speculating or answering hypothetical questions can get you in trouble. Avoid "what if" questions by confining your answers to what is known.
5. **Failure to keep calm:** By not letting questions get under your skin, you will show a willingness to cooperate with courteous journalists and convey an impression of candor. Keep cool.

APPENDIX G

CRISIS COMMUNICATIONS AT THE PLANT

NOTES & CHECKLISTS

*** * ***

**ROWAN & BLEWITT INCORPORATED
1000 Vermont Avenue, N.W.
Suite 1000
Washington, D.C. 20005**

CRISIS COMMUNICATIONS

Communications is at the heart of every plant's emergency planning process -- embracing all first responders, health care providers, police, fire, rescue squads, government agencies, community leaders, plant neighbors, employees and everyone else directly involved in or affected by the emergency.

Dealing with the media is a part of emergency or crisis response that must be prepared for, just like any other aspect. Spokespersons should be trained for their roles. And advance planning must be done to ensure that people dealing with the media have the tools, equipment, skill and training to do their jobs, just like other first responders are trained and equipped for their roles.

The following notes and checklists focus primarily on communications with the media during a crisis.

The media are everywhere and they'll be at the plant if an emergency occurs. Reporters can complicate a problem or help solve it.

It is important to remember that in an emergency, everybody has the same basic priorities -- save lives and avoid injuries. All of us, including the media, have a stake in safety.

Media can calm panic and plant personnel should work with them to assure constructive information flow. Refusing to deal with the press can often be counterproductive. The press will cover the story anyway, without your input -- using whatever information and sources they can find, regardless of how hysterical, negative or inaccurate the stories might turn out to be.

What Constitutes a Crisis?

Any list of potential crisis situations will, of course, be company-specific. This list might include -- explosions; fires; employee accidents; transportation accidents; OSHA citations; Nader-type activist attacks on products; major lawsuits; product spills; odor releases; etc.

Obviously, the kinds of crises which can be anticipated, and in which the communications component will play a major part, are not limited to those which might attract media attention. However, in drawing up a crisis

communications plan that will improve the communications function in all crisis situations, it is useful to consider what generates media interest in a company crisis.

What follows is a non-exhaustive list of the types of issues that might be anticipated to inspire local and possibly even national coverage.

1. Reputation -- Allegations potentially damaging to reputation of company, its products or services, in eyes of any one of its key publics
2. Safety -- Danger, injury or death of employees, surrounding community residents
3. Environment -- Pollution or danger to groundwater, drinking water, streams or ponds, fish, birds, animals, natural habitats
4. Ethics -- Allegations of financial, marketing, or manufacturing wrongdoing and coverups
5. Lawbreaking -- Possible violations of criminal laws, OSHA regulations, EPA orders, EOE standards
6. Unemployment -- Possible layoffs, union-busting
7. Consumerism -- Demonstrations or accusations by activist groups
8. Conflict -- Any situation involving conflict (this is one of the major components in media coverage today)

The emergency preparedness team should assess whether the likelihood of a particular kind of situation warrants special attention. "Anything is possible," as the old adage goes, but some things are obviously more possible than others.

In assessing possible crisis scenarios, and in drawing up contingency plans, it is helpful to bear in mind "Murphy's Law" and the following two quotations -- the first from an official following the Three Mile Island incident and the second from a spokesperson after Bhopal:

1. "The accident...sprang from many separate conditions. It was highly unlikely that all would occur at once. Yet equipment failure and misleading symptoms of the reactor's condition combined to escalate what could have been an easily corrected problem into an accident that became the center of worldwide attention."

2. "The investigation shows clearly that a series of unusual events and circumstances led to the incident, including, among others, the contamination of the storage tank with a large volume of water, the presence of a higher-than-normal amount of chloroform in the methyl isocyanate in storage and the absence of refrigeration..."

CRISIS COMMUNICATION PLANNING

Goals and Objectives

It is imperative that elements of the larger corporate picture be at least considered when establishing the goals and objectives of each plant's crisis communications operations. For this reason, the most senior members of the organization at the plant level should be part of the planning team, including human resources, security, etc., as well as those with public affairs and strictly operational responsibility.

It may not be necessary to involve legal counsel in the actual planning process, but the plan and strategies should be reviewed with counsel, since questions of liability, insurance and possible litigation are almost assuredly going to be raised as a result of any emergency the plant may face.

While it is vital to have the communications plan tailored directly to your plant and its personnel, it is also important to realize that a crisis at any one location or in any one division is going to put the entire company under the media's microscope -- even plants and outlets across the country will feel the effects of increased scrutiny, if the story is picked up by the national media. Thus, liaison with corporate or head office people should also be an important part of the emergency planning process.

Reaching Your Key Publics

It is important early on to:

- (a) identify the key publics that must be communicated with in any given emergency situation.
- (b) establish methods of reaching those key publics.
- (c) designate people responsible for developing the capability of reaching those key publics.

Key publics generally include at least the following:

employees

plant neighbors

community leaders
local, state and federal elected officials
government agencies
customers
suppliers
dealers
corporate headquarters
financial community and analysts
stockholders
media
general public

This list includes those publics with whom your company might wish to communicate about the crisis, how it is being handled and its implications as far as their particular interests are concerned.

The priority ranking of your company's various publics will obviously shift depending upon what crisis arises, as will the methods of reaching those publics. The principal focus here is on dealing with the media in emergency situations since communicating through the media is one of the principal methods of reaching key publics. However, other methods of getting your company's message across should form a part of your company's overall crisis communications plan.

For example, if an emergency results in temporary alterations in work scheduling that require fluidity and alterations with short notice, it may be effective to set up one or more "employees-only" phone numbers with taped messages. This would require the availability of answering machines, and a method of informing the employees of the appropriate numbers for them to call. Or, depending on the numbers of employees affected, it may be more efficient to designate individuals who would be responsible for contacting employees prior to each shift. This would require the fast availability of a list of employee telephone numbers, broken down by work area or function.

Communication with employees may best be accomplished by sending a newsletter to their homes and/or posting copies at pre-designated places in the community.

It is worth stressing that employees should not be ignored as one of the key publics. Particularly in the aftermath of an accident, employees are natural sources of information to which other local residents will turn. They can be a very calming influence if they are knowledgeable and feel as if they have been kept in the picture. If employees feel ignored or anxious because they are ignorant, they can be a negative influence -- feeding unrest and community antipathy rather than easing it.

A general press conference may be the best way, in some circumstances, to get certain vital components of your message out to a majority of the groups your company wants to reach. But a community meeting may be the most appropriate device for sharing a great deal of information that is of paramount interest to local residents, but of lesser import to the general public or others of your key publics.

At the other extreme, direct communications with a key public may not be desirable at all. For assuaging concern in the financial community, it might appear that the most effective form of communication would be having a credible, disinterested third-party expert present your information by appearing on a business talk show or giving interviews to trade or financial media reporters.

Spokespersons

A principal spokesperson and alternates should be designated in advance. All communications with the outside world (except for first responders, of course) should be through the designated spokespersons. The company should be heard to speak with only one voice. Perhaps the greatest danger to a company's image and credibility is the issuing of conflicting messages from different parts of the organization. At Three Mile Island, much panic and needless negative news resulted from conflicting messages being given to the press by personnel at the site and others back in Washington. This undermined almost totally the credibility of TMI sources and resulted in a profusion of erroneous information being disseminated from other sources.

All telephone operators, security personnel and staff should be firmly instructed to refer all questions and inquiries to only the designated spokespersons.

Characteristics of ideal crisis spokespersons include:

composure and tact
common sense
stamina
seniority in organization
knowledge and credibility
ability to translate technical information
effectively into layman's terms

Assistance for Spokespersons

Designate in advance people who will work with the spokesperson to tend to the media's needs and act as couriers -- in particular to meet and escort media representatives. Your regular security staff will be stretched much too thin to take on this responsibility and it is inadvisable to have the media wandering around your facility unescorted.

Competent people will also be needed to help with news statements and releases.

Security personnel should be instructed, in advance:

1. The media are doing their jobs and they have certain rights and legitimate interests in trying to cover the emergency.
2. Be firm in implementing the rules and be uniform -- treat all reporters and photographers alike.
3. Be polite at all times to the media -- but check credentials carefully.
4. In an emergency, any questions of substance or form (e.g., inappropriate or incomplete credentials) should be referred to the designated spokespersons, not answered by the security staff.
5. Don't interfere with media outside gates, unless it is to warn of imminent danger.

Preparations and designation of personnel should take into account the historical fact that a great number of emergency situations develop on weekends, the end of shift holidays and other times when the full staff is unavailable.

Some DO's and DON'Ts for Spokespersons

1. Be honest. Your credibility depends on it.
2. Remember that the media are interested in
WHAT?
WHEN?
WHERE?
WHY?
HOW?
Establish your media information along these lines.
If you have adequate answers at an early stage to the first four questions, you will be able to defer answers about the why and how until all the facts are gathered and evaluated at a later date.
3. Have available information relating to plant processes, raw materials, and chemical intermediates.
4. In some circumstances, stress excellent safety record of industry and your plant -- be sure to emphasize any particularly heroic or outstanding effort by any employees during the emergency and, if possible, make them available for interviews. (Better to have the resulting coverage stress the good news about outstanding employees and not just focus on the bad news side of things.)
5. Decide in advance whether the media spokesperson will discuss the following matters:
 - Level of information about employees injured or killed -- job title; age; sex; hospital/funeral home; amount of time with company; marital status
 - Money estimates of damage or costs to company
 - Existence of and amount of any insurance
 - Potential and/or actual litigation resulting or affected by the crisis

- Estimates or discussions of possible interference with the ongoing business of the company, for example, delays in product delivery, layoffs, plant shutdown.
 - Employee negligence, violation of safety regulations, etc.
6. Do not speculate. Never answer a "what if" type of question -- stick to the facts.
 7. Do not exaggerate.
 8. Do not guess. If you are wrong, you look either (a) incompetent, or (b) sneaky, as if you are trying to deceive the press or hide something from them. If any incorrect information is given to the media, correct it as soon as possible.
 9. Do not provide "exclusive" interviews or information to particular media representatives without providing it to all.
 10. Anticipate obvious questions and develop concisely worded key message answers to those questions.
 11. Decide on level of cooperation regarding photographers inside the plant premises -- a pool system may be a useful compromise to allow controlled media access to the actual emergency site.
 12. Emphasize as much as possible what is being done to correct the problems and contain the emergency -- Americans are a very pragmatic people. They realize problems arise in the ordinary course of events, but they insist on seeing prompt and effective action to deal with the problems. What gets people angry and upset is seeing someone with a problem who is not trying to fix it.
 13. State your conclusions first when answering a question. Follow your conclusions with information and data to back it up. (This is the reverse of our normal way of answering questions in normal conversations or meetings. But consider the way a newspaper article is written. The lead paragraph tells the reader the main point of the story. The rest of the story provides details and further context.)

- (A)
14. Remember that reporters on short deadlines will go with what they have. They will not wait for more complete information. This is simply a fact of life that must be dealt with. The more a spokesperson can help reporters meet their deadlines, the better the company/media relationship, and the more likely that relatively positive coverage can be obtained.

Press Room/ Media Center

Arrangements should be made in advance for establishing a press center from where the media can cover the emergency. This arrangement allows for fast and efficient imparting of information to the media, as well as physically containing reporters, camera people and others in a monitorable area.

Back-up arrangements should be made to set up the press center at a place off-site, such as a large motel/hotel. In case of a major problem, the on-site facilities may be inaccessible.

Arrangements should be made for such mundane items as tables and chairs, wastebaskets, ash trays, typewriters, hardhats and safety gear, coffee pots and cups, radio, clock, staplers, etc.

More importantly access should be available to photocopiers and telephones.

Photocopiers will be horrendously in demand -- arrange access to a high-speed copier, preferably more than one, in close proximity to the plant. The copiers in your plant may not be accessible in a major incident (reduction and enlargement capabilities are major pluses). Multiple copies may be required of at least the following things:

Maps and plans for emergency responders

Handouts for media

Flyers for local residents

Instructions for employees

Meeting the need for the almost instantaneous production of literally hundreds of copies of information can be a major bottleneck in communication during a crisis.

Telephones will also be in heavy demand by all interested parties on-site, near the command center, and around the external communications hub. Arrangements should be made in advance with the local telephone company for installation of additional emergency lines, not just additional telephones to tap into installed lines.

Incoming calls can jam existing lines and paralyze external communications -- calls from concerned residents, employees' relatives, state and local politicians, cleanup companies offering their services, and the media to name a few. Arrangements should include fast installation of lines to be reserved for emergency responder use. One company in New Jersey was fined \$45,000 for failing to report an odor incident in a timely fashion. The company maintained that it had tried to notify the state environmental agency, but couldn't get to them by telephone. Its switchboard lines were jammed.

Loudspeakers for use in cars or trucks can be useful for dealing with situations where bullhorns just can't be heard -- it is a good idea for the company to have one or two on-site or at least available on short notice. These are invaluable for communicating with nearby neighborhoods.

Police cars are often equipped with loudspeakers, but their personnel and resources may well be stretched too thin to allow diversion of their vehicles.

Radio gear should not only be accessible, but should be tested frequently to ensure proper functioning.

In one emergency drill, several first responder teams were unable to communicate with each other by radio for almost an hour because their transmissions were drowned out by "chatter" coming from a malfunctioning radio helmet. (The helmet was brand new, but it apparently hadn't been checked out adequately prior to use in the drill.)

Radio gear for spokespeople is extremely useful, allowing rapid transmission of accurate information to the media. (NOTE: Radio gear also poses some of the most difficult communication problems during a crisis, despite its being one of the most efficient ways of communicating. It is extremely important to arrange in advance for control centers to have radio equipment available that is compatible with all those involved in first response. Knowing in advance which units utilize which bands can avoid dangerous gaps in communication. Arrangements can be made to immediately have fire and police -- or the hazmat van and mobile medical teams -- talk through a dispatcher who has radio gear compatible with each, rather than waste

precious reaction time, miss messages and generally generate confusion before radio incompatibility is recognized.)

Checklists

Prepare in advance readily accessible lists of people and organizations that will need to be contacted in an emergency -- these should include names, addresses and telephone numbers for groups such as the following:

Fire

Police

Hospitals

State EPA

Federal EPA

Other Regulatory Agencies

Employee Representatives

Local Elected Officials

State Elected Officials

Federal Elected Officials

Local Newspapers

Local Radio Stations

Local Television Stations

For emergency response groups, the checklists should also include an indication of the type of equipment, manpower, expected response times and type, band and compatibility of communications gear.

Is All This Really Necessary?

From our own experiences in actual emergencies of all types -- from Three-Mile-Island, through derailed chemical trains, to plant explosions and political protests, we can emphatically answer yes.

If a company is not prepared to take an early proactive approach to communications in a crisis, then an information vacuum is created that others will step in to fill -- activists, pseudo-experts, rumormongers and others detrimental to your company's interests.

Not talking during a crisis is interpreted as "pleading the fifth," because of guilt, or as an attempt to hide how extreme the dangers in fact are. One result leads to a blackened image and credibility for the corporation, the other creates an atmosphere in which panic may thrive.



C&P Telephone
A Bell Atlantic Company

In Case of Chemical Emergency

To the Citizens of Greater Baltimore

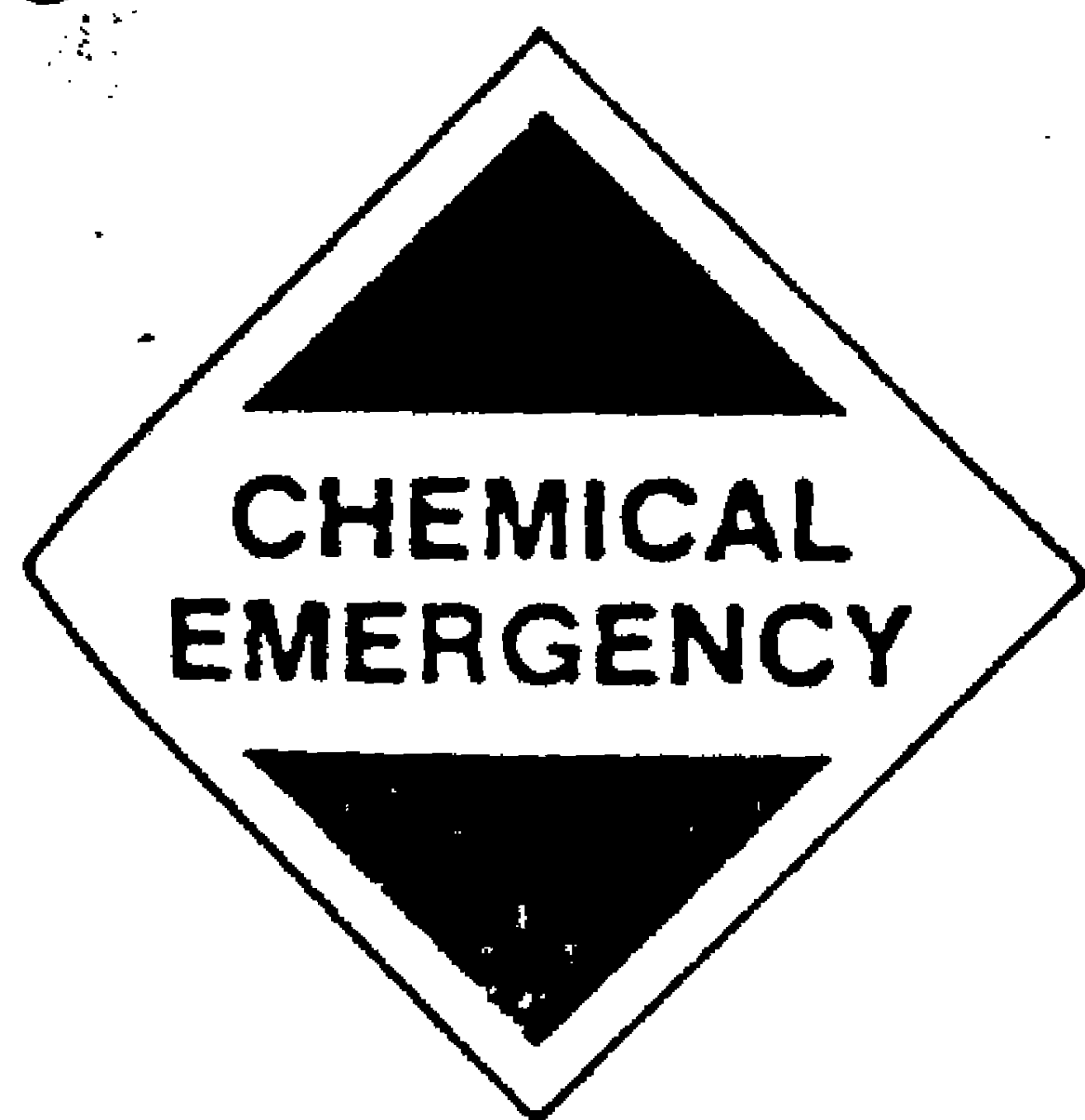
The good things that chemicals bring into our lives have become indispensable to us. Although extremely rare, there always remains a slim chance that a chemical emergency will occur in our community despite the extraordinary precautions that have been taken by the chemical industry. With safety of the public in mind, a coalition of representatives of government, the chemical industry and private agencies have voluntarily prepared a plan for any such emergency. Knowledge of how to respond safely and appropriately, greatly lessens the chance of serious injury

and brings peace of mind. It is in this vein, that this has been prepared, and is presented by the Mayor's Hazardous Materials Advisory Council, and members of the St. Baltimore Industrial Mutual Aid Plan.

Clarence "DU" Burns

Mayor Clarence H. Burns
Baltimore, Maryland

If You Hear the Air Raid Siren for a Prolonged Period:



- Go indoors and stay indoors;
- Tune your radio to WBAL (1090 AM) and listen for instructions;
- Notify hearing impaired or other handicapped people you know;
- If you are in a vehicle, close windows and air system;
- Stay calm.

Tips on Staying Indoors During a Chemical Emergency

- Stay calm;
- Close all windows and doors;
- Turn off all window fans, vents, air conditioners, furnaces, etc.;
- Do not use the telephone;
- Schools will care for and protect children; do not contact the school;
- Bring pets inside;
- If you need to, seal cracks around doors and windows with tape or wet towels.

Things that You Should Keep at Home:

- Battery-operated radio
- Flashlight
- Fresh batteries

If evacuation is necessary

Do Not Evacuate Your Area Unless You Are Told to Do So.

In most chemical emergencies, it is best to remain inside.

If evacuation is necessary, you will be given instructions over the radio by zip code. Tune your radio to WBAL (1090 AM).

Areas affected by the emergency will be identified by **zip code**. However, in most cases, evacuation will not be necessary.

- Keep your radio on; messages will continue until the **all clear** is announced.