

Case Study: Contractor Safety in the Petrochemical Industry

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Introduction

The Valero Bill Greehey Refinery became an OSHA Voluntary Protection Program Star Worksite in August of 2005. Soon after the refinery became a Star Worksite, its management and safety personnel began to focus on mentoring the seven base load contractor groups. The seven contractor companies are; All Tech Inspection, Bay Ltd., Brand Services, Inc., Brock Maintenance, Inc., HandS Constructors, Inc., Scott Electric Company, and Veolia Environmental Services. All seven base load companies completed their onsite VPP audit without any contingency items in April of 2006.

This article discusses some of the improvements and program changes that Valero and its contractor companies experienced to be recognized as a VPP Star Worksite:

- Empowering employees
- Hazard recognition expectations
- Selling the Voluntary Protection Program
- How seven contract companies received star status together
- Challenges of contract companies industrial hygiene program
- Advantages of maintaining a good relationship with OSHA

OSHA Voluntary Protection Program

The OSHA Voluntary Protection Program (VPP) is a program designed to recognize and encourage effective safety and health management. Establishments actually invite a Government agency (OSHA), to conduct an onsite evaluation to determine if the facility is worthy of recognition for its Safety and Health management. When participating in VPP, employees, management, and OSHA work in a cooperative relationship at a workplace that has exemplary Safety and Health Programs. Management voluntarily agrees to maintain a successful Safety and Health Program that meets predetermined VPP requirements and to improve the program continuously with employee participation.

The Voluntary Protection Program has different levels of recognition depending upon your safety and health program. The different levels of recognition include Star, Merit and

Demonstration with Star being the highest level of accomplishment. OSHA will periodically reevaluate the site to ensure it continues to improve and meet the VPP standards.

The Power of Employees

The Valero Bill Greehey Refinery set out to improve its Safety and Health Program late in the year of 2001. The framework used was OSHA's Voluntary Protection Program. As with any improvement, you must begin to move from the status quo and introduce change. Along with any type of change usually comes resistance. Resistance is what must be overcome. If resistance wins it will halt all efforts of progression. One way to combat resistance is to get employees involved. This is what's great about the Voluntary Protection Program. You **must** have employee involvement. Employee involvement empowers the employees to make change. And, if the employees are involved in the change, then how can they also resist? I know what you must be thinking; this is so basic it hurts. But truly, empowering employees goes a long way in determining how change is accepted.

Think of this example; Say you were trying to change the type of weapon a police officer was using. You could hire a professional gunsmith to demonstrate how the new weapon works, have him explain its strengths and weaknesses, and even comment on how much balance it has. Or, you could get a fellow respected police officer to choose the weapon, then talk with other officers about how well the weapon works, how comfortable he feels using it and his views regarding its strengths and weaknesses. Which method do you think would produce the best results for change? That is right, the officer or *peer* would more than likely produce the best result. Change is accepted much easier if employees have an opportunity and the power to have input with the change.

The Valero Bill Greehey Refinery empowered its employees to make change and aligned great people in the right positions to make positive safety and health program changes. The result was, in 2005, the Valero Bill Greehey Refinery's East and West plants became Star Worksites.

Seek and They Will Find

Hazard recognition programs identify hazards and require correction. There are several ways to identify, report, correct and track hazards in the workplace. Be prepared no matter what program you choose. If your facility embarks to attain VPP and puts in place a Hazard Recognition and Reporting Program, you may have more minor hazards than you think. Sure, auditors are trained in hazard recognition and have corrected obvious and major hazards. On the other hand, employees working in an area day in and day out are more likely to observe hazards that were not detected by auditors. The small items can tend to add up. Management must be prepared to put forth the resources to correct these hazards or employee will lose faith and your program will fail. Another thing to be prepared for initially is the *wish list*. These are items that are reported as safety hazards, but are actually only someone's request for convenience. A good way to control the *wish list* reports is to put in place a committee of responsible employees to be able to rule out *wish list* items from the report. When you ask the employees to seek out hazards, they will find them.

Not Just Another Program

As safety professionals, we all have seen safety programs come and go depending on what is new and the flavor of the month. Once the shine has worn off, the program tends to fade away. One hurdle you have to jump when implementing VPP is convincing your employees that VPP is not just another safety program that soon will slip away into the shadows. When implementing VPP's Safety Management system you must, as with all programs, get *buy in* from the top management down to the newest hire. *Buy in* of leadership is not tangible, so ensuring that you remove all negative talk is imperative. This means if you hear unconstructive talk among others it must be dealt with immediately. It is easy to keep up the impression that you are behind a program in a large meeting setting, but what really leaves an impression on someone is the one on one conversation or being overheard in passing. People who have authority in your company must be the first people to accept and promote any safety program you plan to implement. Discipline is what is needed. You have heard of leaders setting the example. They also must be disciplined. You may tend to drift your thoughts to disciplinary action for doing something unacceptable. But being disciplined also means doing the right thing. Are you disciplined enough to do the right thing all the time every time? That is what demonstrates someone's commitment to safety, doing the right thing and making the right decisions, even when no one is looking.

A good way to emphasize to employees that VPP is not just another program is to educate them with the history of VPP. Inform the employees of the longevity of the program. People are more receptive to a program that has been around for awhile. It would be like using a sales tactic that establishments use posting how long they have been in business i.e. (*Established in 1982*). Another way to let employees know that the program is widely accepted is to show them a listing of other companies and industry sectors involved in VPP. I was surprised that one safety management system could be applied to all different types of companies. This was enough evidence for me to see that the VPP Safety Management System really did work. Above all, educate the employees of the management system with and the safety benefits that they will be entitled to.

Large Goals - Large Results

I have often been asked, "How did seven contract companies achieve VPP Star Status at one time?"

The answer is actually basic and straightforward. The large goal was simply set to mentor the seven Valero Bill Greehey Refinery "Base Load" Contractor Companies to become VPP Star Worksites. This goal was set immediately after The Valero Bill Greehey Refinery's East and West Plants were recommended to be Star Sites. This daunting task would either be a great success or be overwhelming and unsuccessful. The refinery was not willing to accept failure. However, mentoring seven companies was definitely going to be a challenge. The seven companies' basic core value of Safety and Health was already elevated through Valero's quest to become a Star Worksite. So the contract companies were one step ahead in that aspect. One challenge was keeping up with the progress and changes of each different company. An aid in the progress was the site Contractor Safety and Health Committee. The committee is chaired and co-chaired by representatives of contractor companies. A Valero Safety Department representative acts as the committee facilitator. It is through this committee working together, gathering and sharing information amongst each other that helped build teamwork in the long run.

All seven contract companies were trying to reach the same goal, to be recognized by OSHA as a Star Worksite. All seven of these companies work together each day in the refinery performing tasks side by side. So, why wouldn't you want a company working right alongside you to have similar Safety and Health programs in place as you do? These programs not only keep your employees safe but also can prevent others from possibly affecting your company by injuring your employees. The more companies that are working with successful Safety and Health programs the safer the refinery will be altogether. The companies that embrace the VPP concept of continuous improvement are no longer stagnant in safety but are now constantly improving every year. Why would you not want that at any facility? Everyone knows that the refinery contract workforce has an enhanced safety culture and **will be improving** it every year. Many of the contract companies have taken the improved Safety and Health Programs that they started at Valero, applied them at other facilities and attained Star Worksites. With all companies working together as a team, everyone benefits by achieving lower incident rates, higher morale and more productivity. Remember; set a large goal if you want large results.

What Science?

Industrial hygiene was an area of improvement for all seven contractor companies. Most of the companies did not have a site industrial hygiene plan in place. This was actually a blessing in disguise for the site. All seven companies were able to be put through training with the site Industrial Hygienist and he was able to impart his expectations of industrial hygiene on them. This meant that the companies would be focusing on areas that the site felt was important. This was truly a mentor student situation since most of the companies were picking up sample media for the first time. After the initial training was conducted, an ongoing instruction on sampling methods used for equipment, such as dosimeters and sample pumps, was performed each month with the different companies, depending on their monitoring strategy. This meant going over the information potentially seven times a month. However, it was a cost saving element in that all seven companies were able to use the same sampling equipment.

Implementing an industrial hygiene program to include a monitoring strategy was only part of the challenge. Next, the site had to impart the science of industrial hygiene. All seven companies had brought all their data results to the site to be entered into a single data base. What to do with all the data that was gathered soon became a good question. First the data was evaluated by the site to determine if any exposure issues were present. The root causes of any exposure issues were concluded. Methods were then created to control or eliminate exposures jointly with the contract companies. This was an advantage to the site in that we were involved in the decision making process of what action would be taken. Valero was involved from the hypothesis of who to evaluate, the sampling methods, lab result data entry, data evaluation, and finally methods to eliminate or control exposures.

Dealing with Employee Turnover

Contract employee turnover seems to be an ever increasing problem in industry. This is especially burdensome with key players in contractor safety. While shooting for the star worksite recognition, Valero base load contractor companies had some safety representative changes. This was frustrating because, as a mentor, you pour a lot of time and effort into individuals that are expected to lead the

way. When these employees move on to better opportunities, then all of the invested time and effort also moves on.

Ensuring the gap is closed on safety representative turnover can be easily accomplished. Safety responsibilities have been required in employee job descriptions; why not outline what programs, responsibilities, and data the safety representative is accountable for? Outlining responsibilities makes the position that sometimes may be overlooked easier to fill with a new employee. Also demand that all files and reports be kept in one central location. Document preservation can sometimes be a problem if only one person knows where documents are kept.

Fear Not Factor

Has anyone ever been happy to hear these words when they come to work: *OSHA will be here today?* I would guess it depends upon your relationship with OSHA. Most of everyone's experience with OSHA has been dealing with some sort of compliance officer. Your whole view about the OSHA team changes when you become a partner with them through the Voluntary Protection Program. The local OSHA office in Corpus Christi is phenomenal. They truly were and continue to be a great help to our facility and contract companies that work here. Valero brought OSHA in early on for the contractor companies to meet with them. The meeting opened dialogue that was different than any other dealings that the companies had with OSHA in the past. The main benefit of this is to tap into the knowledge of these VPP experts. These OSHA employees are conducting audits all over the area on similar companies. They have seen all types of safety programs that work and have also witnessed the ones that do not. Building a relationship with your local office really helps when you need advice with any safety related question and are a good contact to have in your quiver when you get stumped. Build up that relationship and you will no longer fear the words *OSHA will be here today!*

Review

Get involved in the Voluntary Protection Program. Set goals, make changes, and become recognized as a Star Worksite. Take your knowledge acquired while striving for safety and health excellence and mentor another company. Although striving to have all base load contractors recognized as VPP Star Worksites at your facility is a challenge in many ways; the benefits are far too great to not strive for it.