



VPP: Leaders in Safety and Health Excellence

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What is the VPP?

The Voluntary Protection Programs (VPP), adopted by the Occupational Safety and Health Administration (OSHA) on July 2, 1982, recognize and partner with businesses and worksites that show excellence in occupational safety and health. Based on cooperative action among government, industry and labor, VPP addresses worker safety and health issues and expands worker protection. Sites are committed to effective employee protection beyond the requirements of OSHA standards. Requirements for VPP participants are based on comprehensive management systems with active employee involvement to prevent and control the potential safety and health hazards of the site. Companies that qualify view OSHA standards as a minimum level of safety and health performance and set their own more stringent standards, where necessary, for effective employee protection. VPP participants develop and implement systems to effectively identify,

evaluate, prevent and control occupational hazards to prevent employee injuries and illnesses. As a result, the average VPP worksite has a lost workday incidence rate at least 60 percent below industry average

Purpose of the Voluntary Protection Programs

OSHA has long recognized that compliance with occupational safety and health standards alone cannot accomplish all the goals of the OSH Act. The standards, no matter how carefully conceived and developed, will never cover all unsafe and unhealthful activities and conditions. Furthermore, limited resources will never permit regular or exhaustive inspections of all of the nation's workplaces. No amount of standard setting and enforcement can replace the understanding of work processes, materials and hazards that comes with employers' and employees' day-to-day, on-the-job experience. This knowledge, combined with the ability to evaluate and address hazards rapidly and to reward positive action, places employers in a unique position to improve workplace safety and health in ways simply not available to OSHA.

The purpose of VPP is to recognize and promote effective safety and health management systems. As part of VPP, management, labor and OSHA establish a cooperative relationship at a workplace that has implemented a strong safety and health program. These programs are comprised of management systems for preventing or controlling occupational hazards that not only ensure that OSHA's standards are met, but, using flexibility and creativity, go beyond the mandatory requirements to provide the best feasible protections for workers at that site. In the process, these worksites serve as models for safety and health excellence in their industries.

VPP Participation

Worksites that have been evaluated and approved for VPP are removed from programmed inspection lists for the duration of their participation. This frees OSHA's inspection resources for visits to establishments that are less likely to meet the requirements of the OSHA standards. OSHA will still investigate fatalities, valid employee complaints and significant events at VPP sites, but participants enter into a new relationship with OSHA, one in which safety and health problems can be approached cooperatively if and when they arise.

VPP recognition does not diminish existing employer and employee rights and responsibilities under the OSH Act. In particular, OSHA does not intend to increase the liability of any party at an approved VPP site. Employees, or any representatives of employees, becoming more involved in safety and health as part of an OSHA-approved VPP program, are not assuming the employer's statutory or common law responsibilities for providing safe and healthful workplaces. Compliance with OSHA standards and applicable laws remain mandatory and VPP Star sites are re-evaluated every three to five years, to determine their continued eligibility for VPP status. The Assistant Secretary of Labor, OSHA, issues final approval for initial or continued participation in VPP.

Federal and State VPP Programs

Section 18 of the Occupational Safety and Health Act of 1970 encourages states to develop and operate their own job safety and health programs. Currently, there are 22 states jurisdictions operating complete state-plans (covering private sector and state and local government employees)

and four (CT, NJ, NY and VI) which cover public employees only. VPP programs offered by state-plan states must be “at least as effective” as federal VPP programs.

VPP Designations

The VPP features three major designations: Star, Merit and Demonstration.

- **The VPP Star Program** recognizes worksites that meet all the VPP requirements. These facilities are self-sufficient in their ability to control hazards and are re-evaluated every three to five years. An annual evaluation, including injury and illness rates, is submitted annually for review.
- **The VPP Merit Program** is designed for worksites that must take additional steps to meet all VPP requirements. Merit sites receive a list of Merit goals to fulfill in order to achieve Star status. Merit sites are evaluated every 12 to 18 months and are limited to a three-year term under Merit status.
- **The VPP Demonstration Program** pilots alternative strategies to safety and health excellence. Participants are evaluated every 12 to 18 months and their successful approaches may lead to revisions of the Star programs.

Some of the state programs only recognize the Star designation.

By approving an applicant for participation in VPP, OSHA recognizes that the applicant is providing, at a minimum, the basic elements of ongoing, systematic protection of workers at the site. At the celebratory flag raising ceremony, OSHA presents the site with a VPP plaque showing the program in which the site is participating.

The Four Elements of VPP

1. Management Leadership and Employee Involvement

Each applicant must be able to demonstrate top-level management leadership in the site’s safety and health program. Management systems must address accountability and responsibility for safety and health, as well as planning and allocation of adequate resources for worker’s protection. The selection criteria for contractors must also be outlined in the application.

As with any other management system, authority and responsibility for employee safety and health must be integrated with the overall management system of the organization and must involve employees.

The site must provide for and encourage employee involvement in the structure and operation of the program and in decisions that affect employees’ safety and health.

At union sites, all collective bargaining agents must actively support the site’s participation in VPP. This support must be documented and a written agreement (such as a letter) must be submitted with the site’s VPP application. If the union(s) withdraw(s) support for VPP at any time, the site may be obliged to leave the program.

For all general industry worksites, the requirement for employee participation may be met in a variety of ways, as long as employees have at least three active and meaningful ways to participate in safety and health problem identification and resolution.

Examples of acceptable means of providing for employee impact on decision-making include but are not limited to the following:

- Safety and health committees
- Safety observers
- Ad-hoc safety and health problem-solving groups
- Safety and health training of other employees
- Hazard analyses/accident investigations
- Committees that plan and conduct safety and health awareness programs

At least three of these or other equally effective means of employee involvement must be included in a site's safety and health program.

2. Worksite Analysis

The applicant must demonstrate to OSHA that adequate analyses and inspections are performed at the site to determine potential hazards. The following procedures must be discussed in the application:

1. The use of comprehensive safety and industrial hygiene surveys to identify existing or potential hazards
2. Pre-use analysis procedures for new processes, materials or equipment to determine potential hazards
3. Routine industrial hygiene monitoring of toxic substances and noise
4. Monthly self-inspections (weekly for construction) with written documentation and hazard correction tracking
5. Routine hazard analysis procedures such as JHAs, JSAs, BJAs, PHAs that result in improved work practices and/or training for employees
6. A written hazard reporting system enabling employees to pass on their observations or concerns to management without fear of reprisal
7. Accident investigations with written documentation
8. Method of documenting all identified hazards until they are controlled or eliminated
9. Analysis of trends in injury/illness experience and in hazards found to identify patterns of problems and to implement program adjustments

3. Hazard Prevention and Control

Based on the results of hazard assessment, identified hazards and potential hazards must be eliminated or controlled by the following methods:

- 1) Reasonable site access to certified industrial hygienists (CIH) and certified safety professionals (CSP) as needed, based on the potentially significant risks of the site;
- 2) Means for eliminating or controlling hazards, including:
 - a. Engineering controls;
 - b. Administrative controls such as job rotation to reduce the duration of exposure;
 - c. Personal protective equipment; and

- d. Safety and health rules, including safe and healthful work procedures for specific operations, that
 - (i) are understood and followed by all affected parties;
 - (ii) are appropriate to the potential hazards of the site;
 - (iii) result in training, positive reinforcement and correction of unsafe performance;
 - (iv) are equitably enforced through a clearly communicated written disciplinary system that includes procedures for disciplinary action or reorientation of managers, supervisors and employees who break or disregard safety rules, safe work practices, proper materials handling or emergency procedures; and
 - (v) are written, implemented and updated by management as needed and are used by employees;
- 3) Documented ongoing monitoring and maintenance of workplace equipment, Such as preventive and/or predictive maintenance, to prevent equipment from becoming hazardous;
- 4) A system for initiating and tracking hazard correction in a timely manner;
- 5) A medical program that uses occupational health professionals to analyze hazards as appropriate for early recognition and treatment of illness and injury and for limiting the severity of harm and that provides, at a minimum, certified first aid and cardiopulmonary resuscitation (CPR) providers onsite and physician and emergency medical care nearby, so that harm can be minimized; and
- 6) Procedures for response to emergencies. These procedures must be written and communicated to all employees, must list requirements for personal protective equipment, first aid, medical care, and emergency egress, and must include provisions for emergency telephone numbers, exit routes and training drills including annual evacuation drills.

4. Safety and Health Training

Training is necessary to implement management's commitment to prevent exposure to hazards. All employees must understand the hazards to which they may be exposed and how to prevent harm to themselves and others from exposure to these hazards, so that they will accept and follow established safety and health procedures. Training for safety and health must ensure that:

- 1) Managers understand their safety and health responsibilities and will effectively carry out those responsibilities;
- 2) Supervisors understand their safety and health responsibilities and carry them out effectively.
- 3) Employees are made aware of hazards and the safe work procedures to follow in order to protect themselves from hazards, through training provided at the same time they are taught to do a job and through reinforcement;
- 4) Where personal protective equipment is required, employees understand that it is required, why it is required, its limitations, how to use it and how to maintain it; and employees must use it properly.

How to Apply to VPP

VPP emphasizes the importance of worksite safety and health management systems in meeting the goal of the OSH Act “to assure so far as possible every working man and woman in the Nation safe and healthful working conditions ...” This emphasis is demonstrated through assistance to employers in their efforts to reach the VPP level of excellence; through cooperation among government, labor and management to resolve safety and health problems and through official recognition of excellent safety and health management systems. VPP sites are not expected to be perfect, but they are expected to effectively protect their workers from the hazards of the workplace through their safety and health programs.

VPP On-Site Evaluation, Celebration and Continuous Improvement

An OSHA team visits the site for 4-5 days. The evaluation consists of an opening conference, interviews, documentation review, walkthroughs and closing conference. A daily briefing also takes place at the end of each day of evaluation, which presents a good opportunity to discuss findings and go over any issues that might have come up. The team makes a recommendation at the end of the visit and leaves a draft report.

When formal approval is received from OSHA, a ceremony is held where OSHA presents the VPP plaque to the site. The ceremony is attended by company employees as well as outside dignitaries.

OSHA expects continuous improvement from a VPP site. The site must do a self-evaluation annually. OSHA typically revisits every 3-5 years to re-approve the site in VPP. The frequency can be shorter for Merit and Star Demonstration sites.

Benefits of the Voluntary Protection Programs

Improved Safety Performance Creates Economic Benefits

“The VPP creates an ongoing safety culture that makes our safety program a way of life...not an extra duty.”

Darwin Irish, Safety and Environment Manager, Flexcon Company, Inc., Spencer, Mass.

The decline in injury and illness rates ultimately leads to lower workers’ compensation premiums and insurance rates. The cost savings realized by facilities participating in the VPP provide a powerful economic incentive to implement adequate safety and health programs. Potlatch Corporation, Consumer Products Division in Lewiston, ID, a diversified forest products facility with 700 employees first entered VPP at a Merit Site in 1996 and achieved Star status in 1998. Since 1995, the site has experienced a steady decline in injury incident rates and worker’s compensation costs and broken safety, production and quality records. This success led the diversified products company to encourage all of its sites to pursue VPP status.

“My site first began researching the VPP in 1994. In 1995, we started pursuing our goal to become an OSHA STAR site seriously, and in 1996 we were awarded MERIT status. That year we broke all of our safety, quality, and production records. We have repeated that every year since then, and I am proud to say we attained STAR status in 1998.”

Stephen Brown, former Union Safety Representative, PACE Local #712, Potlatch, Consumer Products Division, Lewiston, ID

Enhanced Public Recognition and Outreach

“Being a VPP Star Site has shown our community that we are dedicated to the safety and health of our employees, as well as being a friend of the environment. Local dignitaries who have visited the mill recognize the VPP flag as a symbol of our role as active participants in our community’s development.”

Edward Vivlemore, Safety Supervisor, International Paper, Oswego, NY

Another benefit of the VPP is the positive public recognition received by participating sites. Participants are recognized not only by OSHA, but also by their local communities and industry peers. VPP worksites are regarded as superior performers in safety and health excellence. The positive recognition enables company facilities to enhance their relationship with their surrounding community and other similar industrial plants.

Many participating facilities host “Open House” days in which they invite members of the community to visit the plant, learn more about its operations and observe practical safety and health information that may be applicable to the home. Many facilities also interact closely with community groups to share information on processes, preventive measures and emergency preparedness.

VPP sites also act as mentors to other facilities interested in pursuing VPP, sharing their experiences and best practices to encourage a safer working environment nationwide.

Increased Employee Benefits

“The VPP has been a major plus for the morale of the employees and for their focus on personal safety, on and off the job.”

Bill Russell, former Safety and Security Coordinator, Armstrong World Industries, Inc., Stillwater, OK

VPP participants, in addition to significant economic advantages, report signs of increased employee benefits through such indicators as decreased absenteeism, higher morale among employees, a feeling of ownership among employees and an enhanced relationship between labor and management.

Employee spirits are high at VPP sites because they know that they play an integral part of ensuring a safe and helpful workplace and that their concerns are listened to and acted upon. One participating worksite found in conducting its annual employee survey that employee satisfaction with safety and health at their facility increased dramatically once VPP status was achieved. The year prior to VPP acceptance, 72 percent of the workforce believed that their plant was safe and healthful. Following approval into the VPP, the figure escalated to 93 percent satisfaction.

Leveraged Governmental Resources

“Being a VPP participant creates an environment of trust between the company and OSHA and encourages industry and OSHA to work in a proactive, rather than a reactive mode. VPP is a ‘win-win’ for everyone and the real winners are the employees.”

Paul Villane, CSP, OHST, SGE, former VPPPA Executive Director, former Corporate Safety Manager, Solutia, Gonzalez, FL

The cooperative spirit among labor, management and OSHA also aids OSHA in the innovation of new and improved ways to provide safe and healthful workplaces. VPP participant sites host OSHA officials to observe and learn from implemented safety and health programs. The flow of information from private sector firms to OSHA on successful methods of addressing workplace safety and health leverages government resources. OSHA is provided with reliable, proven methods of worker protection, which can be incorporated into the development and interpretation of standards and Agency training efforts. VPP sites assist OSHA by providing VPP volunteers who are trained to assist their local OSHA representatives with VPP onsite reviews. VPP facilities also participate in the VPPA Mentoring Program, which enables potential VPP applicants to learn from the experiences of current VPP sites. These programs foster high quality VPP applications, as well as a better use of resources for OSHA.

The VPP is a valuable tool for both industry and OSHA and a critical part of the Agency's strategy to ensure worker safety and health by relying on cooperative programs balanced with consistent, firm, fair enforcement. OSHA has recognized the value of this program over time and has placed the VPP on its lists of priorities to continue this partnership program excellence.

VPP: The Cutting Edge

"Our global talent supply is less than the demand. In order to be successful, companies need to attract and retain key talent. It's a matter of survival. A safe and healthy workplace is an expectation."

Rich Guimond, Vice-President and Corporate Director of Environment, Health and Safety at Motorola, Arlington Heights, IL

Members of the VPP are considered superior in pursuing new technical and managerial advances in worker safety and health protection. In 2000, for example, Hazleton Pumps, Inc., in Hazleton, PA, was named 2000 Champion of Safety by *Occupational Hazards* magazine, for their superior environmental health and safety program. VPP facilities have recognized that in order for their companies and all of American industry to compete in the global economy, they must accomplish the goal of achieving greater cost savings, enhanced productivity and high-quality production. By implementing worker safety and health programs to a level of quality required within the guidelines of the VPP, this goal will be fulfilled.

New Initiatives – OSHA's 3 C's

The three C's — OSHA Challenge, VPP Corporate and VPP Construction Program — are OSHA's latest initiatives. The initiatives are designed to expand programs to promote the safety and health of thousands more workers across the nation.

The **OSHA Challenge Program** (pilot) was officially kicked off on May 26, 2004. The program offers a "roadmap" for employers interested in implementing management systems to improve worker safety and health. The pilot, which offers both a general industry and a construction track, was created to serve OSHA's commitment to expanding cooperative programs for safer and healthier workplaces. It supports the Agency's mission to protect lives by reducing fatalities, injuries and illnesses in the workplace by reaching out to private and public-sector employers that are not yet eligible for current safety and health excellence programs such as the VPP.

The OSHA Challenge pilot takes into consideration that employers working toward VPP status are at different stages in the development of effective safety and health management systems. They can enter the pilot program at any stage and will receive recognition for incremental progress.

All participants are required to show their progress by demonstrating knowledge, action, documentation and specific outcomes at the completion of each stage. The administrator assists the participant with collecting and reporting the required data. And, at the completion of each stage, OSHA will provide recognition to the participant. At the completion of the final stage, the participant should be ready to apply for VPP.

VPP Corporate provides corporations pursuing VPP at facilities throughout their organization a more efficient way of accomplishing this goal. Corporations with well-established, standardized safety and health management systems implemented at facilities throughout the organization will be able to avoid unnecessary duplication of efforts when applying for VPP participation for individual facilities by eliminating the redundancy in the VPP application and onsite evaluation processes while maintaining the quality and integrity of VPP.

As part of their application, interested corporations describe how standardized corporate-level policies and programs consistent with VPP criteria are applied at facilities throughout their organization. Following a review of the application, OSHA will conduct a comprehensive corporate program evaluation at the corporate office/headquarters to verify the contents of the application.

Once the corporation is accepted into the program, all of their eligible facilities will follow streamlined application and onsite evaluation processes. The facility application requires only facility-specific information and eliminates the need to repeat information contained in the corporate VPP application. The streamlined facility onsite evaluation will evaluate only selected VPP elements. Once the individual facility is approved as a VPP site, all standard VPP requirements apply.

The **VPP Construction Program** addresses the unique needs of the construction industry. Over the last several years, OSHA implemented two pilot/demonstration programs to evaluate alternative VPP criteria for construction employers. These programs focused on short-term construction projects and mobile workforce employers.

The pilots were evaluated and showed positive and beneficial results for participants. As a result, the design of the VPP Construction Program is being modeled closely after these pilots. The program's goal is to make VPP more accessible to construction employers, especially small construction employers. This program will maintain the high standards of VPP while expanding participation to broad categories of employers within the construction industry such as short-term projects, mobile workforces, general contractors and subcontractors.

Special Government Employee (SGE) Program

The SGE Program was established to allow industry employees to work alongside OSHA during VPP onsite evaluations. While it gives industry and government an opportunity to work together and share views and ideas, it is a valuable resource for OSHA in an effort to meet the challenge of an increased number of VPP applications.

After submitting an application and completing the required training, qualified volunteers are sworn in as SGEs and are approved to assist with VPP onsite evaluations. They are funded by their companies to participate.

Role of Special Government Employee:

As part of a VPP onsite evaluation team, an SGE contributes to the assessment of a VPP applicant's or participant's safety and health management system. The team duties include:

- reviewing the written safety and health management system and supporting documents;
- conducting a site walkthrough to observe working conditions and to verify that: (1) hazards have been appropriately controlled, and (2) a comprehensive safety and health management system has been successfully implemented; and
- conducting formal and informal employee interviews.

What is VPPPA?

The Voluntary Protection Programs Participants' Association, Inc. (VPPPA), a nonprofit, 501(c)(3) charitable organization, is the leading occupational safety and health organization dedicated to cooperative safety and health programs. For 25 years, the association has provided its members a direct link to OSHA's federal and state-plan programs and the Department of Energy and continues to offer a support network for VPP participants from a wide variety of industries.

By way of educational offerings, publications, services and networking opportunities, the VPPPA strives to provide the most relevant, productive and rewarding experience for each of the association's members.

- **Education and Networking.** VPPPA's Annual National Conference is the premier safety and health conference in the nation focusing on VPP and safety and health modeling excellence. The conference draws participants from all over the world who are interested in learning and sharing best practices in safety, health and the environment. In addition to the annual conference, which consists of regular workshops, an exhibit and networking functions, the 10 VPPPA chapters, corresponding to the 10 OSHA regions, provide educational and networking opportunities on a local level through chapter conferences.

The association also offers one-day workshops tailored expressly for those interested or already involved in OSHA, DOE or state-plan VPP. The VPP 101 Workshop fits the needs of worksites interested in pursuing VPP. The VPP Application Workshop[®] is designed for worksites interested in applying to the VPP. The Strengthening Star Quality Workshops offers experienced VPP participants a unique opportunity to exchange ideas and discover fresh approaches to meeting the requirements for VPP re-approvals.

- **Government Affairs.** The VPPPA Government Affairs Department aims to keep association members informed of regulatory and legislative developments. Upon request, the association provides expertise in the form of comments and stakeholder feedback on rulemakings and policies, as well as comments and testimony regarding legislation impacting worker health and safety and the environment.

- **Communication and Outreach.** VPPPA’s Communications & Outreach Department is the gatekeeper to the VPPPA membership, informing members of the association’s events, activities, services and goals, as well as publicizing members’ safety achievements. The association publishes a quarterly magazine, *The Leader*, and three e-newsletters — *Washington Update*, *On the Wire* and the *Safety News Network*.

The association’s *Directory of Best Practices*, as well as other publications, serve as valuable resources to VPP sites.

- **Membership and Development.** Through its recruitment and retention programs, VPPPA’s membership has dramatically increased with continual industry diversity and small business emphasis. Customized membership categories ensure that members are provided with relevant member benefits.

VPPPA’s Mentoring Program matches sites interested in VPP with experienced VPPPA members to learn best practices techniques to “get it right the first time.”

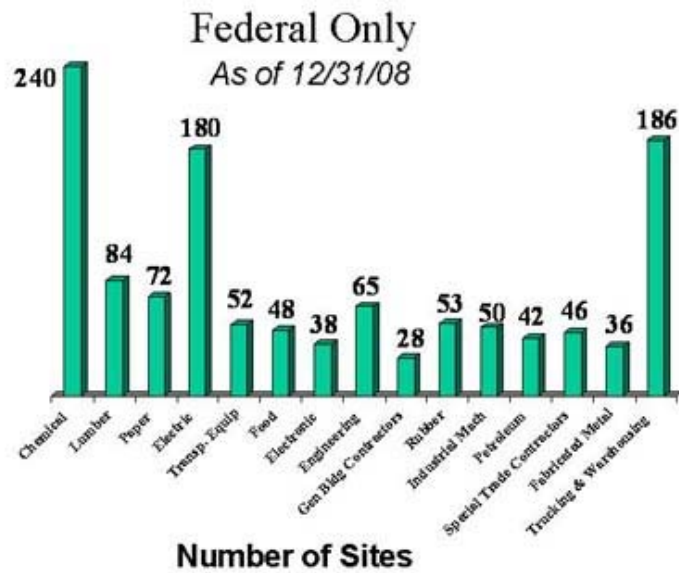
In recognition of members’ achievements, the VPPPA awards individuals and sites through annual awards for outreach and innovation, as well as the Safety and Health Achievement Award Program, which was designed to recognize hourly workers from member sites.

To learn more about the VPP and the VPPPA, please visit the following Web sites:

- www.osha.gov
- www.vpppa.org.
- www.eh.doe.gov/vpp/
- www.bls.gov

Additional Information

Top 15 Industries In The VPP

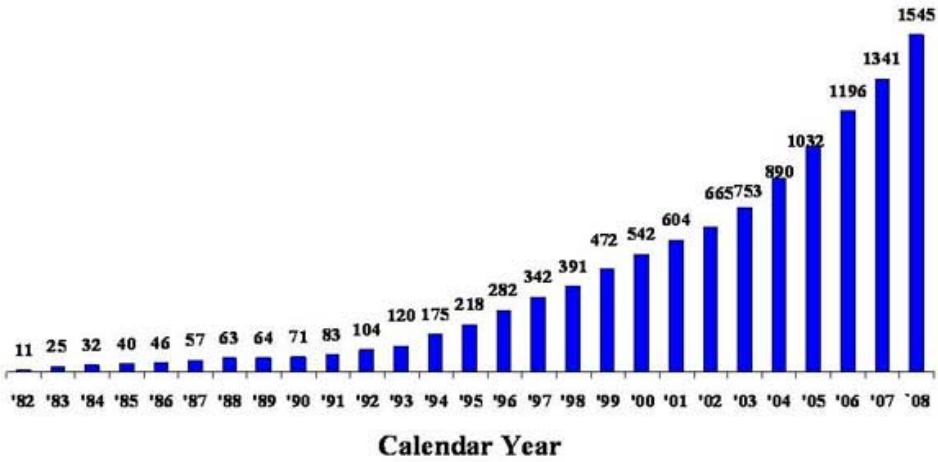


Source: OSHA, Office of Partnerships & Recognition

Growth of VPP

Federal Only

As of 12/31/08

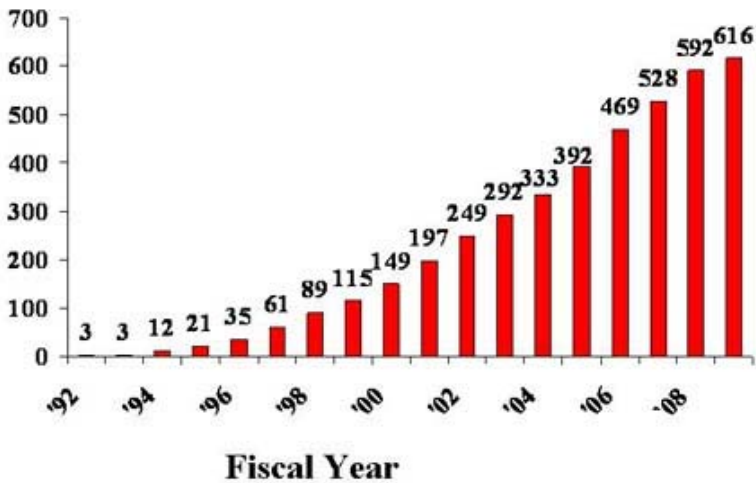


Source: OSHA, Office of Partnership & Recognition

Growth of VPP

State Plan States

As of 12/31/08



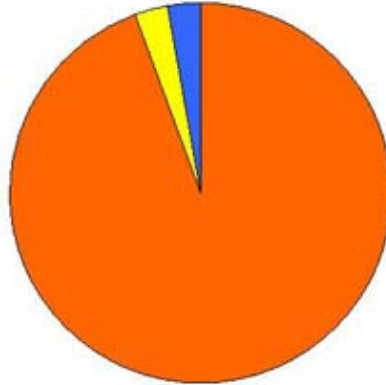
Source: OSHA, Office Partnerships & Recognition

Current VPP Participants

Federal Only

As of 12/31/08

Star Demo - 43 44 Merit

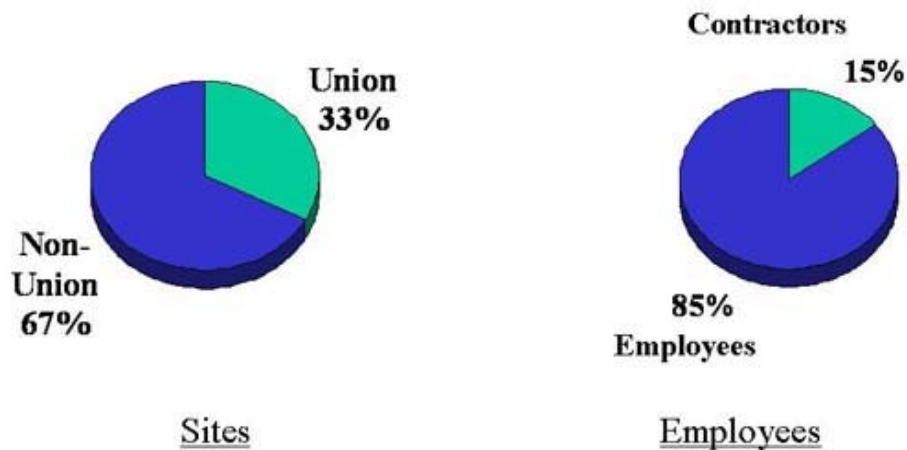


Star - 1458

Source: OSHA, Office of Partnerships & Recognition

Union & Non-Union VPP Sites

Federal Only -- As of 12/31/08



Source: OSHA, Office Partnerships & Recognition

Industries in the VPP Federal and State Plans As of 12/31/2008

<u>01 - Agricultural Production-Crops</u>	<u>46 - Pipelines, Except Natural Gas</u>
<u>02 - Agricultural Production-Livestock</u>	<u>47 - Transportation Services</u>
<u>07 - Agricultural Services</u>	<u>48 - Communications</u>
<u>08 - Forestry</u>	<u>49 - Electric, Gas, And Sanitary Services</u>
<u>13 - Oil And Gas Extraction</u>	<u>50 - Wholesale Trade-Durable Goods</u>
<u>15 - General Building Contractors</u>	<u>51 - Wholesale Trade-Nondurable Goods</u>
<u>16 - Heavy Construction, Ex. Building</u>	<u>52 - Building Materials & Garden Supplies</u>
<u>17 - Special Trade Contractors</u>	<u>54 - Food Stores</u>
<u>20 - Food And Kindred Products</u>	<u>55 - Automotive Dealers & Service Stations</u>
<u>22 - Textile Mill Products</u>	<u>59 - Miscellaneous Retail</u>
<u>24 - Lumber And Wood Products</u>	<u>63 - Insurance Carriers</u>

25 - Furniture And Fixtures

26 - Paper And Allied Products

27 - Printing And Publishing

28 - Chemicals And Allied Products

29 - Petroleum And Coal Products

30 - Rubber And Misc. Plastics Products

31 - Leather And Leather Products

32 - Stone, Clay, And Glass Products

33 - Primary Metal Industries

34 - Fabricated Metal Products

35 - Industrial Machinery And Equipment

36 - Electronic & Other Electric Equip.

37 - Transportation Equipment

38 - Instruments And Related Products

39 - Misc. Manufacturing Industries

42 - Trucking And Warehousing

43 - U.S. Postal Service

45 - Transportation By Air

67 - Holding & Other Investment Offices

70 - Hotels and Other Lodging Places

73 - Business Services

75 - Auto Repair, Services, and Parking

76 - Misc. Repair Services

79 - Amusement & Recreation Services

80 - Health Services

82 - Educational Services

83 - Social Services

87 - Engineering & Management Services

91 - Executive, Legislative, And General

92 - Justice, Public Order, And Safety

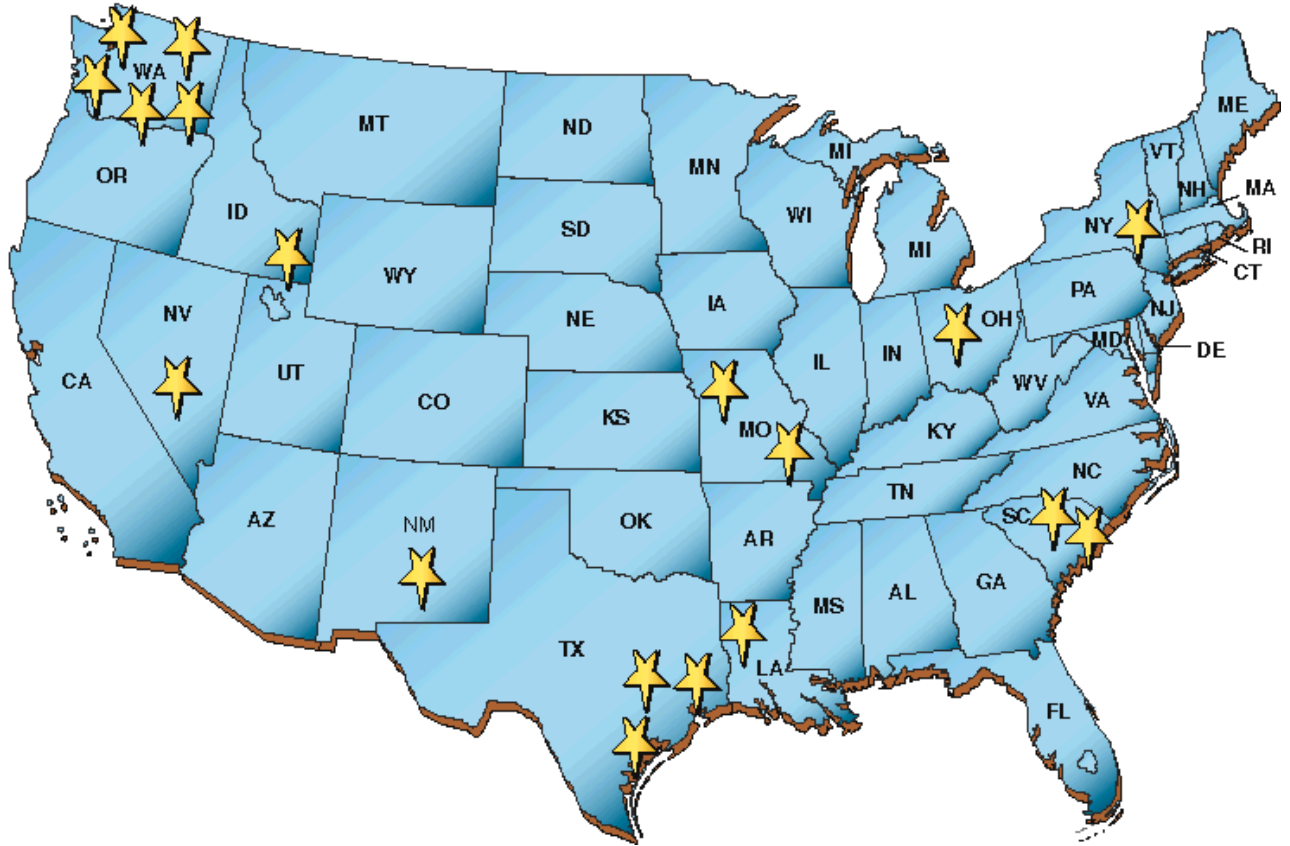
94 - Administration Of Human Resources

95 - Environmental Quality And Housing

96 - Administration Of Economic Programs

97 - National Security And Intl. Affairs

DOE VPP Sites as of 1/10/2008



Refer to www.hss.energy.gov/HealthSafety/WSHA/vpp/partstat/partstat.html for a list of DOE-VPP participants.