

Implementing the OSHA Voluntary Protection Program (VPP)

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Introduction

To many safety professionals, having your facility attain the Voluntary Protection Program (VPP) Star status is the highest award in safety and health. VPP is not easy to achieve; companies do not always see the cost-benefit of removing and minimizing the hazards in the workplace. This paper will help introduce VPP to the safety professional, the VPP application process, VPP Timeline, Internal VPP Self-Assessment, the levels of VPP, a description of the VPP elements, and a description of the VPP site assessment and finally some of the benefits of VPP.

What is the Voluntary Protection Program (VPP)?

Many safety professionals have stated to me, “What is VPP?” The answer is, *in my own words*, VPP is a proactive approach to safety and health. Facilities analyze which standards apply to them and proactively eliminate or reduce the injury potential. One of the major focuses of VPP is holding the Management and Supervisors of employees responsible for their safety and health. VPP also has an element of continual identification and elimination of hazards. VPP is not something that everyone can gear up for and then when it’s over go back to the normal way of doing things. VPP is a mindset and culture. VPP also has active involvement of employees. The employees can be your greatest asset in injury reduction. They have to work on the machines and processes everyday. They know the written hazards in the operations manual and they know how it operates in reality.

VPP Application Process

The VPP application process was not an easy process. I will be talking about the process that I had going through the OSHA Region III office. Please check the specific requirements of your state or region. There was a long narrative that had to be written to describe the facility and the

safety programs there. While this is not difficult it was about 35 pages of typing. VPP does have a few minimums which must be achieved to even apply for the program. First, the average facility incident rate must be below the industry average of your injury. The Bureau of Labor Statistics can be search for specifics to your industry. Next, you must have management commitment to VPP. This can be difficult to measure as management will always say they support safety. The step is more of a feel, rather than a quantitative measure. Management is also expected to set the example and communicate safety expectations to the workforce. One very effective way is to have management participate in safety by holding meetings on topics from PP to building evacuations. Safety must also be part of the employees performance review. Not the main focus but it must be documented somewhere in the performance appraisal. The next step is to gather the incident rates for the permanent contractors that work at your facility. If a contractor's hours are over 1000 in a calendar quarter, then these hours and their incident rate for their industry must be tracked and documented. Another step is to self assess your facility using the VPP Self-Assessment Checklist. This is a very good tool to help gauge if a facility is ready for VPP. The next step is for unionized facilities only; you must have the support of the Union or collective bargaining agreement for entrance into VPP. The final step is to complete the actual VPP application. The application is not difficult, just a lot of typing as you are describing your facility to persons who not visited it and may not poses much knowledge of your operations.

VPP Timeline

When we first started the VPP journey, we figured that we would call OSHA and they would send a team out for the VPP Assessment within 30 days or so. The VPP teams are very busy and you must plan ahead to get on their schedules. For Region III, there is also an onsite VPP Pre-Assessment to make sure that you are ready and really serious about safety. There are a lot of companies that never make it past the VP Pre-Assessment. This approach makes perfect sense. Resources are limited and nobody wants to waste each others time. We also did an "internal VPP Self-Assessment" since we had to wait for resources to be freed up. Here's the timeline we had:

- March 2004 – Contacted OSHA about VPP requirements
- April 2004 – Conducted Internal VPP Self-Assessment
- December 2004 – Region III VPP Pre-Assessment
- April 2005 – Region III VPP Assessment – received VPP Star Award
- August 2005 – Formal VPP Ceremony

We decided to pursue VPP for four basic reasons:

- Safety is a core operating principle
- Outstanding program already in place but wanted to make it World Class; dedication to continuous improvement
- Validate safety program by OSHA
- Reward employees for their hard work and dedication to safety

After contacting OSHA, we decided to conduct an internal VPP Self-Evaluation.

The earliest that OSHA Region III could come in to see us for the VPP Pre-Assessment was 6 months away. We started the process of bringing in a 3rd party for a more objective view of our

safety program. The 3rd party double checked all the programs and systems in place. The 3rd party also administered simulated interview questions to about 5% of the facility personnel.

Internal VPP Self-Assessment

What we learned is that we had a fantastic system in place but did have a few items to work on to be a VPP quality program. We learned that we, as a site and a corporation, did not communicate metrics and lessons learned very well. We also learned that some people have anxiety when answering questions from an authority figure. We also had some employees that viewed “helping safety” as a job expectation and when the questions were asked about helping with safety, some said “I don’t help with safety around here.”

We used the same model of a VPP self-evaluation followed by an independent 3rd party at the 2 other locations. One of the other locations has been a VPP site since December 2005 and the 3rd location is going through the process right now and scheduled for an evaluation in late July. The first location is going through their 3 yr. VPP Re-Assessment in July 2008.

The Three Levels of VPP

The three levels of VPP are Star, Merit and Demonstration. Star is the highest level with a re-evaluation cycle of three to five years. Merit is the second level with a re-evaluation cycle of 18 – 24 months. The merit level means that some of the elements are not of VPP quality and fine tuning is still needed. Finally, the demonstration category is a safety program of VPP quality but does not fit into all the performance based criteria.

The Four Elements of VPP

The four elements of VPP are:

- Management Leadership and Employee Involvement
- Worksite Analysis
- Hazard Prevention and Control
- Safety and Health Training

Management Leadership and Employee Involvement. Management leadership provides the motivation to the workforce in the forms of goals and objectives. Management also ensures there are adequate resources in the form of staff and the financial resources to achieve a world-class safety and health program. Here is where management proves that safety is a core operating principle and commitment to safety has just as much vigor as production and quality. Employee Involvement is when employees are encouraged to express their opinions and recommendations regarding safety and health. Employees are expected to correct safety issues when they are discovered. If they cannot correct the safety issue, they are asked to consult their Supervisor and they can work on it together. If this does not produce a solution, then the Environmental, Health

and Safety Department is notified to help. Employees are empowered to take action and the expectation is that they take action. Do not push the problem on someone else to correct. Here are a few examples of employee involvement:

- Proactively addressing and correcting safety issues
- Elevating safety issues to Supervisors and EHS Department as necessary
- Open door policy with EHS Department
- Participating in and critiquing fire and gas evacuation drills
- Process hazard reviews for new and modified pieces of equipment
- Writing Standard Operating Procedures (SOPs), Job Hazard Analysis (JHA) and safety inspections.

Worksite Analysis is when existing hazards are identified and corrected. Another aspect of worksite analysis is a program to review new and modified construction to ensure all hazards are abated or minimized during construction. Another area is how the facility allows new chemistry to be introduced to the site. This is very important since some chemicals will react with others. Some other examples of worksite analysis include:

- Safety inspections
- New construction, reconfigured areas
- Equipment installations
- Equipment relocations
- New chemistry introduced to the site

Hazard Prevention and Control is when hazards are prevented by engineering the hazards out. Where it is not feasible to eliminate them, they are controlled to minimize potential exposure. Elimination or control is accomplished in a timely manner and tracked to completion. Money does not grow on trees, so interim controls are used until a permanent solution is found. Some examples of hazard prevention and control include:

- Toxic gas monitoring
- Hazardous gases dispensed through gas cabinets
- Hazardous gas lines are double walled
- Chemical storage and hazard class separation
- Spill cables in chemical storage bunkers
- Scrubbers and Point of Use (POU) Abatement
- Industrial Hygiene Surveys

Finally there is Safety and Health Training. This is a subjective area as the facility dictates by hazard analysis the safety and health training subjects. The nature of the hazards will dictate the training. Some training subjects we used were:

- Hazard Communication
- Lockout/Tagout
- Laser Safety
- Hazardous Waste

- First-Aid/CPR
- Blood borne Pathogens

Description of the VPP Assessment

For the VPP Site Assessment, we did need some resources. We needed a conference room for PowerPoint presentations along with a phone and internet access. We also needed 5 small offices for employee interviews. We needed 3 sire escorts to help escort the OSHA officials from point A to Point B. We had 4 Region III OSHA officials and one OSHA official from the National Office in Washington DC. The OSHA officials were onsite for about 30 hours total.

Day 1

There was an opening conference where we discussed the manufacturing process. Maps were issued to all personnel and then we did a window tour of the entire facility, to include the wastewater areas.

Day 2

This day was heavy on documentation review to include standard operating procedures (SOPs) for personal protective equipment (PPE), lockout/tagout, emergency response and building evacuations. Other areas that were emphasized included contractor safety, chemical approval process, industrial hygiene surveys, medical surveillance, ventilation surveys and equipment installation and lockout/tagout. At the same time as the documents were being reviewed, employees were interviewed informally. These were usually just 2 or 3 questions to help check SOPs and equipment operating procedures.

Day 3

This day was filled with formal interviews in the morning and a check of safety and health training records in the afternoon. The OSHA personnel each interviewed 6 personnel for a half hour each for a total of 30 personnel. The Managing Director was given a 90-minute interview. Almost all employees were interviewed in either a formal or informal way. Safety and Health training was checked to see if employees were getting the correct training and in the correct intervals. The decertification process was also covered for employees that did not get their training completed on time.

Day 4

On the 4th day, we wrapped up any open action items and conducted a comprehensive closing conference along with the VPP Star award recommendation. There was some additional paperwork the OSHA VPP coordinator had to complete so at the end of the VPP Assessment, only award recommendations are given.

VPP Maintenance

After you are in VPP you are certainly not done. VPP is based on continuous improvement. There is always something that you can improve upon and do better. There is an annual VPP Self-Assessment due by February 15th every year. The major aspect of VPP is the continuous improvement.

VPP Benefits

The VPP benefits include:

- Facility is taken off the scheduled & random OSHA inspection list
- Good working relationship with local OSHA office
- Employee complaints are handled by phone calls to the facility VPP Coordinator
 - If these issues cannot be corrected; then they will come onsite

The less measurable VPP benefits include:

- Bragging Rights
- Improved Employee Morale
- Improved Teamwork
- Less employee turnover
- Communities view the facility as good neighbor

The VPP negatives included:

- Anxiety about the unknown (how hard is VPP?)
- Used conference room for entire week
- Biggest hurdle was VPP orientation for employees
 - VPP Questions are oriented on how employees help with safety
 - Employees had to be trained that they help with safety (job expectation)

Conclusion

The VPP program was received in a very positive manner. The site received the OSHA VPP Star Award. There was extremely high moral and team work among the employees. The facility has gone over 2 years without a recordable injury and almost 2 million hours without a lost time accident. I would recommend this program to any facility.