

# Achieving OSHA VPP “STAR” Status and Its Benefits

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## ABSTRACT

The Occupational Safety and Health Administration (OSHA) created the Voluntary Protection Program (hereafter referred to as VPP) to recognize industrial institutions that demonstrate exemplary safety and health programs, which exceed the minimum requirements, set forth by the Code of Federal Regulations. The Montenay International Corporation, parent company of Montenay Energy Resources of Montgomery County, Inc. (hereafter referred to as MERMCI) committed resources, manpower and funding to prepare the site for OSHA VPP acceptance.

MERMCI first scrutinized all aspects of their safety and health program; comparing existing practices to OSHA guidelines for total safety compliance. Having met preliminary guidelines, dedicated personnel prepared the application, which took about one (1) year. The application was submitted to OSHA in Washington D.C. and the Philadelphia region III office for preliminary approval.

The regional VPP administrator visited the site to verify qualifications governing the basis for program admittance. Injury and illness rates, industry average comparisons and initial recordkeeping practices were examined. A tentative date was set to perform an in-depth inspection of the facility, interview the majority of the employees and make a determination for program approval.

The OSHA inspectors thoroughly inspected the facility and made a recommendation for MERMCI to participate in the Voluntary Protection Program at the “STAR” level.

## INTRODUCTION

The main objective of participation in the OSHA Voluntary Protection Program serves to instill a high degree of safety awareness among all employees. Following the guidelines of OSHA and the Federal Code of Regulations (29 CFR Part 1910. for General Industry), industrial facilities are mandated to train employees, monitor health conditions and correct safety related issues. This ensures the environment and workplace are free of any potential hazards or requires engineering controls to be implemented and/or requires utilization of protective equipment to reduce known and existing hazards.

The purpose of the program is:

- To emphasize the importance of structured programs.
- Continual improvement of existing health and safety training.
- Recognize excellence in Employer-provided programs.
- Tailor programs to site-specific needs.

- Control and minimize occupational hazards.
- Administer programs that exceed “OSHA” minimum standards.
- Provide the best feasible protection for all employees at the facility.

The OSHA VPP has three (3) levels of participation and are referred to as:

<i>Demonstration</i>	Injury and illness rates are at or above the industry average; some safety programs exist but are in need of enhancement.
<i>Merit</i>	Injury and illness rates are at or below the industry average; some or the majority of safety programs are in place.
<i>Star</i>	Injury and illness rates are below the industry average; safety and health programs are exemplary and go beyond the minimum OSHA requirements. Current recognized facilities number 269, nationwide.

This paper will present an overview of how the facility prepared for an OSHA evaluation for VPP admittance and will explain the benefits in doing so.

## **BODY**

The MERMCI facility began commercial operation in February of 1992. This Waste-to-Energy facility processes 1216 tons of solid waste, daily, converting thermal energy into electrical generation. The turbine-generator output realizes 36 megawatts of electricity that is sold to a local utility. The facility operates 24 hours a day, 365 days a year with 2 scheduled outage periods, at six-month intervals, lasting approximately 6-10 days per unit. Each unit consists of a waterwall tube, stepper grate furnace and supporting auxiliary equipment. The facility has two (2) units and one (1) turbine generator.

Employees at MERMCI are made up of three (3) departments; Administration, Operations and Maintenance. Operations personnel, numbering some 26 skilled and semi-skilled power plant workers including Supervisors, Control Room and plant equipment technicians, work 12 hour shifts on four (4) crews. 10 maintenance employees, comprised of mechanics, electricians and instrument technicians are scheduled on a five (5) day workweek during regular business hours. Administrative employees, numbering ten (10) consist of a Facility Manager, Department Heads and support personnel, work regular business hours, five days a week. Vendors, service personnel and outside contractors frequently are on site to perform various tasks, as needed.

During the construction and initial start-up phase of the facility, the Operations Manager and Corporate Safety Manager administered safety training. As the staff gained experience in power plant operations, safety training, recordkeeping and industrial hygiene monitoring duties were passed along

to the Shift Supervisors, who could more readily administer and track the ongoing safety and health programs. The facility has steadily enhanced its safety and health awareness and training, from 1991 to present, by the efforts all employees, working as a team.

In December of 1995, a review of our OSHA 200 logs indicated a downward trend in injury and illness rates for the first four years of operation. Incident rates for the facility vs. industry average figures were parallel and a new direction was needed to systematically reduce injuries and accidents even further. The Company President and Vice Presidents, Corporate Safety Manager, Facility Manager, Operations Manager and a Shift Supervisor discussed the benefits of pursuing the OSHA Voluntary Protection Program as an instrument to enhance our efforts for safety awareness using all available resources toward a comprehensive program for safety and health.

Mr. John Sammons, an Operations Supervisor, was assigned to oversee our efforts in researching and exploring the possibilities of becoming a "Star" work site. Mr. Sammons and the Corporate Safety Manager, Mr. Angus Miller in Islip, New York, attended various meetings and conferences to gain knowledge needed to establish comprehensive health and safety programs that would meet criteria set forth by OSHA. An American Ref-Fuel facility, located in Hempstead, New York (Long Island) was contacted and readily volunteered to assist us in structuring our programs. This was the initial boost that provided us the momentum to pursue VPP. American Ref-Fuel, Hempstead, had achieved "Star" status about two (2) years prior to our interest.

With Corporate support, Facility Management agreed to proceed with this project. Having done so, a meeting was held with all facility employees and the project was explained, benefits detailed and an employee buy-in was realized. This single and initial step would serve as the most important aspect of the entire project. Without employee involvement, a comprehensive health and safety program (at the level required for VPP) would and will not function.

To align MERMCI' safety and health programs with OSHA requirements, the following summarized points were scrutinized and enhanced, where needed.

- *Management Commitment and Planning* – Goal oriented objectives, established policies
- *Accountability* – Documented procedures for holding managers and supervisors responsible
- *Disciplinary Program* – written program communicated to all employees
- *Injury rates* – Three year average rate for both total and lost time/restricted cases
- *Employee Participation* – meaningful ways for employees to participate in the program
- *Self-Inspections* – General Industry, monthly, tracking hazards to completion, etc.
- *Employee Hazard Reporting System* – written reporting system/tracking to completion
- *Accident/Incident Investigation* – written procedures, findings/tracking to correction
- *JSA/Process Review* – Analysis of job and process hazards
- *Safety and Health Training* – PPE use, emergencies, hazard awareness and potential effects
- *Preventive Maintenance* – written program and ongoing monitoring of equipment
- *Emergency Programs/Drills* – written program and unannounced drills
- *Health Program* – Baseline surveys, sampling and testing in all areas of the facility
- *Personal Protective Equipment* – Training, care, use and replacement procedures
- *Safety & Health Staff Involved with Changes* – New process and material analysis
- *Contractor Safety* – Selection, training and enforcement
- *Medical Program* – established physician services and employee training for 1<sup>st</sup> Aid/CPR
- *Resources* – Access to certified Safety Professionals and Industrial Hygienists
- *Annual Evaluation* – action dates covering all 19 elements with status from preceding year

These 19 VPP necessities constitute the basic elements of the program. A well-structured, effective and comprehensive facility safety and health program will contain all 19 elements, as a minimum and will include additional elements warranted by the specific process and nature of the business.

With a three (3) year injury and illness average below industry ratings and ongoing training in place, MERMCI prepared a 102-page application detailing all pertinent information required by the application submittal guidelines of OSHA. Contents of this document included Corporate and Facility staff members, safety professional resources and summarized written program elements. A statement is attached and attested to, for the purpose of authenticating the contents.

On January 15, 1997 MERMCI submitted its application to OSHA in Washington D.C. and to the Philadelphia Region III office. Mr. Peter Brown, regional VPP coordinator, contacted the facility in early February to acknowledge receipt of the application and to briefly discuss some preliminary details. His interest in the Waste-to-Energy field was expressed; having had no prior experience in this particular industry. He requested and obtained a tentative date of April 21, 1997, to take an initial tour of our facility and to verify data.

The administrative staff and the facility safety committee members met with Mr. Brown on April 21, 1997 for most of the day. Peter Brown is a well-seasoned OSHA official having spent several years as a health compliance officer, in the field. His first order of business after introductions was to verify the Standard Industrial Classification (SIC) code and injury and illness industry averages with our three-year average. Calculations rendered a 92% below industry average, for injury rates, at the facility; a point that would later prove instrumental in confirming the effectiveness of program administration. Mr. Brown proceeded to discuss other facts and findings of his preliminary assessment of our application. He concluded his visit with a tour/inspection of the process facility.

Continuing our preparation for the OSHA on-site evaluation/inspection which Peter Brown scheduled for the week of July 21, we requested several area companies (within our OSHA VPP region) to allow us to visit/discuss what we should and could expect of our pending inspection. OSHA recently has encouraged "outreach" methods, whereas companies working toward a common goal of safety oriented programs, may and should share information, proven methods and ideas. We found that region III companies, already designated as "Star" sites, were cordially responsive to our requests for assistance and communication. This is an ongoing benefit of participating in VPP.

The OSHA inspection/evaluation team consisted of Mr. Peter Brown, Regional VPP Coordinator, Mr. Gerald Kennedy, CSP, International Paper Co., Covington, Kentucky, special government employee for OSHA VPP sites and Mr. John Womer, Safety Specialist, Harrisburg, Pennsylvania OSHA regional office. Their one week on-site evaluation consisted of a detailed inspection of the facility for compliance in safety and health issues, reviewing the written program materials, verifying recordkeeping of training, health and medical records, employee interviews to conclude the effectiveness of training and to gain an overview of the Waste-to-Energy process. Employees from all departments assisted the evaluation team in making their visit a success.

At the closing conference during evaluation week, Mr. Brown addressed the assembled personnel and spoke of what it takes to become a "Star" work site. The inspirational message he conveyed to the facility team was admiration for a group who had accomplished so much with limited outside resources. He announced, during the course of this meeting, that Montenay Energy Resources of Montgomery County, Inc. was recommended for the OSHA Voluntary Protection Program "STAR"

status. The 24-page report of the evaluation team findings was forwarded to Washington D.C. for final approval by the Assistant Secretary of Labor, which occurred on January 29, 1998.

Work sites approved for “STAR” receive a plaque and VPP flag, which symbolize the intrinsic value of program participation. More importantly, each and every MERMCI employee has a responsibility to their fellow employees to practice safety in performance of their duties. Our Company is dedicated, first and foremost; to provide a workplace for our employees and visitors, where they and their families know they are protected from harm and free from injury. Of all benefits of the VPP, this is the single most important benefit. Every MERMCI employee will tell you so.

All VPP sites have collectively concluded that additional benefits realized through program participation include:

- Improved employee motivation to work safely, leading to better quality and productivity.
- Reduced workers’ compensation cost.
- Recognition in the community and industry.
- Improvement in existing health and safety programs.
- An average of 60 – 80 % fewer lost workday injuries than would be expected of an “average” facility; when compared to similar worksites with the same number of employees.

## CONCLUSIONS

The Occupational Safety and Health Administration (OSHA) may have already visited your work site. If not, they may be planning to do so in the near future. In either case, OSHA, through its cooperative programs like VPP can be an important ally rather than an adversary. We at MERMCI have found that to be true.

Given 5.2 million work sites that exist in the United States, OSHA recognizes 269 as Federal VPP “Star” sites. This equates to only 1 in every 19, 330 work sites as “Star” recognized. MERMCI employees are proud of the fact that they work at the “ONE”!