



Contractor Safety in the Challenge/VPP World

Speakers:

Cindy Lewis, Director
Gulf Coast Safety Institute

Dennis Blowers, VPP & Health Service Lead
LANXESS

Course Objectives

- At the completion of this session the attendees will be able to:
 - describe the minimum requirements for a contractor oversight program in the OSHA Challenge and VPP.
 - define “contractor” under the OSHA Challenge and VPP.
 - discuss the common issues in developing a contractor oversight program.

Contractor: Definitions

- Contractor. A person performing work at a facility that is “under contract” and the individual employees are not paid by the host site.
- Not an employee or a visitor.



Contractor: Definitions

- Resident Contractor. A company that provides ongoing, onsite services to a Challenge/VPP applicant/participant.
- Applicable Contractor. A contractor whose employees worked at least 1,000 hours for a VPP participant in any calendar quarter within the last 12 months and are not directly supervised by the participant.
 - Hours and OSHA 300 log data must be submitted on the Annual Self Evaluation to OSHA.

Contractor: Definitions

- Basically this means ALL contractors, whether regularly involved in routine site operations or engaged in temporary projects are part of the process....!

Contractor: Definitions

- Contractor
- Service Provider
- Vendor
- Temporary

[New OSHA Directive!](#)

Contractor Written Programs

- Selection Process
 - Safety & Health Criteria
 - Who will review and “approve”
 - Exemption process
 - Removal (Discipline)
 - Individual Contractor Employee
 - Contractor Company
 - Review or Renewal

Contractor Written Programs

- Equal safety and health protection
- Training
 - Compliance
 - Performance
 - Site-specific
 - “Cover all the bases”
- Require contractors’ adherence to site safety and health rules.
- Assessment and correction of Hazards in contractor work areas

Contractor Written Programs

- Management of safety via a comprehensive system including Audits and Feedback
- Mentoring of contractors to develop and improve their own safety and health management systems

Contractor Programs: Nuts and Bolts

- Typical Contractor-side problems seen from an Administrator point of view:
 - “That doesn’t apply to us”
 - “That’s what they told us to do”
 - “But it’s an Emergency”
 - “We have that – but it’s at the main office”
 - “But we copied it from the OSHA web site”

Contractor Programs: Nuts and Bolts

- Typical Owner-side problems seen from an Administrator point of view:
 - “We can’t do that because (insert reason here)”
 - Limited Resources
 - Time constraints
 - Co-employment
 - Liability

Emergency Response

Locate nearest evacuation route but What Else?



Advice to new Participants on Contractor Management

- Managing contractors must be a priority of all organizations within your worksite-
TEAMWORK!
- You must have a visible presence to ensure contractor safety!
- Many contractors want to help you achieve VPP and some have very good suggestions.
- Develop a contractor management policy and audit schedule and then **STICK TO IT.**



Contractor Management from a Site's Viewpoint

Dennis Blowers, CSP
Safety & Health Management Systems Lead
LANXESS Corporation

The background of the slide is a stylized American flag with horizontal stripes and stars. The stars are arranged in a grid pattern, with some stars appearing to glow or be slightly blurred. The stripes are in shades of red, white, and blue. The overall effect is a patriotic and professional aesthetic.

Questions?

Thank You!

Contact Information

Ed Parsons

Outreach Program Coordinator

Gulf Coast Safety Institute

College of the Mainland

Texas City TX

eparsons@com.edu

409-933-8372

Dennis Blowers

Safety & Health Management Systems Lead

LANXESS

Orange TX

Dennis.Blowers@LANXESS.com

409-882-2665