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
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