Documentation, Documentation, Documentation

Speakers:

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OSHA Challenge Coordinator
Gulf Coast Safety Institute

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Health and Safety Manager
Univar USA, Inc.
Course Objectives

• At the completion of this session the attendees will be able to:
  – explain the documentation expectations for the OSHA Challenge and VPP.
  – describe best practices and potential pitfalls in maintaining documentation through the OSHA Challenge and VPP application process.
Typical Questions

- Should our documentation be in paper or electronic? Or both?
- How much is too little? Or too much?
- How many examples should you have of each document?
Documentation

• Paper vs Electronic?
  – Presently, sites use a combination of paper & electronic formats.
  – What should be in paper and what should be electronic?
    • Prior to the audit, sit down with your OSHA VPP coordinator and communicate what best suites the company and balance that with what the audit team needs to do their job.
  – What makes sense?
    • Databases – Electronic (sample reports)
    • Anything already paper – leave as is!
Documentation

• Paper vs Electronic
  – If you choose to show documents electronically then make sure that you have someone that can navigate your system seamlessly.
    • One person for each laptop available to the auditors.
  – Be prepared. Have multiple back up systems.
How to organize

• Paper
  – Very Common - Binders
• Electronic
  – Elements/Sub-element folders
Documentation

• How much is too little or too much?
  – Remember the requirement – Have all VPP elements and sub-elements been in place for at least 1 year? Therefore, prepare to demonstrate.

• How many examples of each item?
  – This is your time to tell the audit team what your company really does BEST.
Pitfalls

• Documents are not completely filled out. Examples:
  – Training dates
  – Trainers Information
  – Review dates
  – Signatures missing

• Documents are missing
Pitfalls

• Where are the documents kept – both electronic and paper?
  – Create a list of document “owners”

• Company abbreviations different from OSHA terms
  – Create a “thesaurus” of terms and abbreviations

• One person is responsible for keeping the documentation in order
  – Have multiple members of your VPP team know how the documents are filed.
• ‘If it isn’t written, it doesn’t exist.’

“IN GOD WE TRUST”
(all others we monitor!)
Introduction

ChemCare® is a comprehensive service of Univar USA that coordinates the transportation and disposal of both hazardous and non-hazardous waste.

Provide access to a full spectrum of waste management technologies, including:

- Hazardous and Non-Hazardous: Recycling
- Fuels blending
- Aqueous treatment
- Deep well injection
- Onsite service work such as tank cleaning, and site clean up
- Incineration
- Lab Packing
- Landfill
- Waste to Energy

Presented by Daryl Bladt
Topics

• Our approach.
• Lessons learned.
• Examples.
Common Questions

• How did you start pulling all of your documents together?
• If you were to start over again – would you do it differently?
• What other lessons learned on keeping documentation?
• What advice would you have for anyone starting this process?
OCTPS - How we set up our files

### Stage III -- Management Leadership and Employee Involvement

<table>
<thead>
<tr>
<th>Participant Name</th>
<th>Administrator Name</th>
<th>Report Period</th>
</tr>
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<tbody>
<tr>
<td>UniV USA Inc. - ChemCare</td>
<td>Gulf Coast Safety Institute</td>
<td>13-Aug 2013</td>
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<table>
<thead>
<tr>
<th>1. Management Commitment - Required Actions</th>
<th>Participant Status</th>
<th>Administrator Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Safety and Health Mission and Policy Statements: Continue to communicate the site's Safety and Health Mission and Policy Statements for the total site and to take necessary steps to ensure all employees and contractors understand the statements. Ensure that appropriate information about the site's Safety and Health Mission and Policy Statements becomes routinely a part of the site's general communication and of specific training for new employees and contractors.</td>
<td>Completed</td>
<td>Completed</td>
</tr>
</tbody>
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Participant Actions Taken: Trained on and provided a hard copy to all employees on the new policy in Sept/Oct 2013 monthly training. Annual training occurred in Jan 2013. Updated the Safety Handbook Oct 2012. All new hires and temporary employees receive training on the EHS policy during training and are provided a hard copy via the Safety Handbook. Verification of understanding via written test or interview to be conducted in June 2013. June 2013 written evaluations were conducted via the June safety incentive and safety buck program. Interviews were held during the first week of June assessing the ability of the employee to paraphrase the HSE, Goals and Open Door policies. Additionally, core interview items included accountability, responsibility and authority under the SHMS system. Results were evaluated and safety end health plan updated to cover gaps discovered during the interview.

Administrator Narrative: 08.13.13 CL. Reviewed the current policy & mission statements, new hire training, contractor training,
Questions?

Thank you!
Contact Information

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