

A blue ribbon graphic with a folded end on the right side, containing white text.

POWER
GENERATION
VPP WORKGROUP

August 20, 2020

Please check in on the chat function with your name, title and company. Feel free to add email

- Welcome

- Kelli Heflin, Safety Manager, Southwest Generation
- Alex Miller, Regional Safety Manager, Vistra Corporation

3RD Quarter
Meeting



MASSPOWER



Safety Moment

Marc Sullivan

EHS Manger, MASSPOWER

Indian Orchard, MA

Organization _____
Name: _____
Phone Number: _____



Contractors Health and Safety Questionnaire

We believe that one of the most important aspects of our operations is to provide a safe and healthy work environment for all Contractors. To help us accommodate this goal, we ask your cooperation in completing the following survey by circling the appropriate number or response after each question you answer.

1 - Strongly Agree 2 - Agree 3 - Disagree 4 - Strongly Disagree

- | | | | | |
|--|---|---|---|---|
| 1) The Health and Safety rules of MASSPOWER have been clearly explained to me | 1 | 2 | 3 | 4 |
| 2) I know what to do in the case of an emergency and I know where the rally points are located | 1 | 2 | 3 | 4 |
| 3) Clear communication was carried out between myself and the Control Room Operator | 1 | 2 | 3 | 4 |
| 4) I believe the Facility does a good job with proper signage, markings and labeling. | 1 | 2 | 3 | 4 |
| 5) I feel safe when I work at MASSPOWER. | 1 | 2 | 3 | 4 |
| 6) I feel comfortable reporting a safety event at the Facility and I know who I need to report it to | 1 | 2 | 3 | 4 |
| 7) I believe that the General Housekeeping of the Facility is in good order. | 1 | 2 | 3 | 4 |
| 8) I feel that MASSPOWER's safety procedures are enforced | 1 | 2 | 3 | 4 |
| 9) I believe that my own employer provides the right PPE for the job at this Facility. | 1 | 2 | 3 | 4 |

Additional Comments: This section is to provide a chance for All Contractors to give feedback to MASSPOWER. Feedback can be in the form of Health and Safety suggestions, workplace hazards that have been identified or betterments for our Health and Safety Program here.

Thank you for your cooperation



CONTRACTOR QUESTIONNAIRE

- Safety Manual
 - Incorporate information from ALL required written programs (LOTO, Confined Space, Haz Com etc)
 - Separate written programs for major programs—LOTO, Confined Space etc
 - “Minor” required programs (Sanitation etc) addressed in Safety Manual or do you create separate written programs for all programs referenced in Safety Manual?
 - What has been your experience in VPP audits?
 - How do you keep them updated if you have 25 separate written programs?
 - Corporate vs. Plant written programs
 - Written Safety Management System Policy
 - Who has a separate policy? (or do you have a statement in your safety policy?)
 - Best Practice for a VPP audit

VPP ELEMENT: Written Programs

VPP Policy Manual Spotlight

- VPP WITHDRAWAL / TERMINATION APPEALS
PROCESS UPDATE
 - Alex Miller



Background

- VPP site with 19 employees
- Entered 2year Injury and Illness Rate Reduction plan in 2018
- Suffered a recordable injury in 2019
- Injury and illness rate did decrease below the most recent BLS
- OSHA requested the site withdraw

VPP
WITHDRAWAL /
TERMINATION
APPEALS
PROCESS

VPP
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TERMINATION
APPEALS
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OSHA Released the updated VPP Policy manual on January 30th, 2020

https://www.osha.gov/sites/default/files/enforcement/directives/CSP_03-01-005.pdf

Chapter 5, Section VIII (A)(4) covers Rate Reduction Plans (pg. 82)

Chapter 11, Section VII(B) covers the VPP Withdrawal Process (pg. 120)

Sites may be asked to withdraw or be terminated for a number of reasons

- Fatality/catastrophe at a VPP site
- Non fatality/catastrophe enforcement action
- Failure to report a fatality, hospitalization, amputation, or loss of an eye within the required time period
- Failure to maintain injury and illness rates below required levels
- Failure to timely submit annual self-evaluations

VPP WITHDRAWAL / TERMINATION APPEALS PROCESS

VPP WITHDRAWAL / TERMINATION APPEALS PROCESS

Withdrawal process Overview

- OSHA sends written request to voluntarily withdraw
- Site can either accept and voluntarily withdraw decline to withdraw.
- If a site decides to not to withdraw, OSHA will file a Notice of Intent to Terminate

This is when the appeals process can begin

IMPORTANT!

If a site voluntarily withdraws, they are eligible to reapply after 1 year.

If a site does not voluntarily withdraw and is terminated, they are not eligible to reapply

Back to back, two-year Rate Reduction Plans are not allowed.

If, within five years after successfully completing a two-year rate reduction plan, the site's three-year rates rise to or above the most recent BLS rates, the site will be asked to withdraw from VPP for 3 years.

VPP
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VPP WITHDRAWAL / TERMINATION APPEALS PROCESS

- The participant has 30 days from the receipt of termination to appeal the intent to terminate or to withdraw.
- If the decision to appeal is made, the site must provide to the Assistant Secretary, through the RA, in writing, the reasons why it should not be removed from VPP.

When should you appeal?

Extenuating circumstances that may be outside of the site's control.

Although an appeals process exists, its current context is intended for situations other than elevated injury and illness rates.

VPP
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Challenges



- VPP VIRTUAL AUDITS: OPPORTUNITIES AND CHALLENGES
 - Have your sites / companies developed any process or practices to provide value during virtual assessments?

- USE OF HEALTH QUESTIONNAIRES UPON RETURN TO WORK
 - WHO IS CURRENTLY USING?
 - FORMAT?
 - THOUGHTS FOR IMPROVEMENT
- PANDEMIC UPDATES
 - PLANNING/TRAINING
 - INCLUDE IN WRITTEN CONTRACTOR PROGRAM

GROUP DISCUSSIONS

PARTICIPATION OPPORTUNITIES

- a. Design logo for group
 - i. Ideas and suggestions
- b. Newsletter:
 - i. Suggested topics
- c. Planning Committee
 - i. Volunteers Needed



- GIVEAWAY INCENTIVES FOR PARTICIPATION?
- The Message Board should be our main method of communication between meetings

<https://powergenerationvpp.freeforums.net/>



MESSAGE
BOARD

VPPPA CONFERENCES



- A. Region 7 — Oct 5-7
- B. Region 9 — CANCELED
- C. National — CANCELED



- Propose presentations at both Regional and National conferences
 - Standardized presentation in as many regions as possible for 2021
 - Additional Presentation for National Convention
 - Contact Alex or Kelli for further information

2021 VPPPA CONFERENCES

Next Call NOVEMBER 19, 2020

If you have not already done so, please enter your attendee names, site name and company name into the chat function on the Zoom meeting. This will take the place of a Roll Call

NEED VOLUNTEERS FOR:

- a. Safety Moment
- b. VPP element
- c. Note taker
- d. Group discussion topics

Send Suggestions or offers to volunteer to:

Alex Miller – alexander.miller@vistraenergy.com

Or

Kelli Heflin - HeflinK@SouthwestGen.com