

VPP Power Generation

Quarterly Meeting

August 20, 2020 @ 1500 EST (1300 MT)

Total Participants: 32

Total indicated attendance: 16

1. Welcome by Kelli Heflin and Alex Miller
2. Safety Moment – Marc Sullivan, MASSPOWER,
 - a. Contractor Safety Questionnaire (attached)
 - i. Provided to contractors at end of work scope
 - ii. Allows for positive and negative feedback
 - iii. Has led to several significant safety improvements
 1. Blue light visual indication on fork truck shines to the rear so that pedestrians are aware of potential movement
 2. Hardhat sticker with emergency contact info and pertinent personal medical info in inside it
3. VPP Element – Written programs – Kelli Heflin
 - a. In consideration “minor” programs, are they stand alone programs or are the embedded into more significant programs? How are the required reviews managed?
 - i. Alex Miller – Embed “minor” programs into others to reduce overall number of procedures. For example: First aid and BBP covered in Emergency Action Plans.
 - ii. Paul Hanna – Approximately 31 procedures. Enlisted 3rd party assistance to review and update
 - iii. Brad Baptiste – Provided an example of a VPP site that holds an annual procedure review week at their HQ. One representative from each site works with their EHS team to review and update all programs and procedures. They when they return to their sites, they provide training on all changes that were made to their teams
 - iv. Brian Sullivan – Program Owner organization. Individuals or teams own and maintain certain programs and procedures
 - b. Corporate vs. Site Specific Programs
 - i. Palmer Behles – Having site specific plans offers granularity at that corporate programs cannot. Site addendums can be used to enhance corporate programs.
 - ii. Bran Baptiste – It is considered to be a “Red Flag” when only high-level corporate programs are available. It is good to have corporate level programs but there needs to be site – specifics. Focus of effectiveness over formality
 - iii. Brian Sullivan – Ensure that site level programs co not counter or conflict with corporate programs
 - c. Safety Management System documents – **Tabled**
4. VPP Challenges
 - a. VPP voluntary withdrawal and Termination Process Update – Alex Miller

- i. A VPP site entered an Injury and Illness Rate Reduction Plan in 2018. Injuries did not get below BLS average and OSHA requested that the site withdraw from the program
 - ii. This site did a lot of outreach and wanted to go through the appeals process. There was a small workforce at the site
 - iii. The newest VPP policy manual was discussed and a link was provided in the presentation
 - iv. There can be withdrawal/termination for a number of reasons, including failure to file annual self-evaluation and failure to maintain injury and illness rates below the BLS average for peers in the same NAICS code
 - v. The withdrawal process was reviewed:
 - 1. OSHA will send an official notice
 - 2. Site can accept termination or volunteer to withdraw
 - 3. If site decides not to withdraw, OSHA files a Notice of Intent to Terminate
 - 4. If site voluntarily withdraws—they may reapply in one year
 - 5. If OSHA terminates—the site may not reapply for 3 years
 - 6. Back to back IIRR plans are not allowed (they are 2 years)
 - 7. Sites have 30 days from receipt of Notice of Intent to appeal the notice. In the current context, the appeal process is intended for situations other than elevated injury and illness rates. There was further discussion by Brad Baptiste and Brian Sullivan, both OSHA employees regarding “extenuating circumstances”
 - 8. Brian Ahern – Examples used were a plane crashing into the building (an extenuating circumstance completely out of the control of the employer) vs lightning strike (all sites should have a severe weather policy).
- b. VPP Challenges: Virtual Assessments
- i. Desire to add value to VPP process while maintaining social distancing policies
 - ii. Virtual audits take on a blended approach
 - 1. Virtual opening and closing
 - 2. Virtual document review
 - 3. Abbreviated time onsite for walkdown
 - iii. Potential for continuation after COVID-19 due to financial savings
 - iv. Benefits
 - 1. More thorough review of documents
 - 2. More time to complete document review
 - v. Drawbacks
 - 1. Less thorough site walk-down
 - 2. May need assistance locating electronic files during assessment
 - a. Recommend appointing a single “virtual escort” to assist in file navigation
 - vi. Mike Kelley – Other entities, such as insurance, are using similar formats for audits

5. Group discussions
 - a. Health Questionnaires for return to work – **Tabled**
 - b. Pandemic Updates – **Tabled**
6. Participation opportunities – Contact Kelli Heflin or Alex Miller for more information
 - a. Soliciting participation for:
 - i. Group logo
 - ii. Newsletter
 - iii. Planning committee
 - b. Message Board Use
 - i. Will incentives increase utilization?
7. VPPPA conferences – Only region 7 is still holding their Annual Conference
8. 2021 VPPPA Conference Presentations
 - a. Propose to create and present at
 - i. Regional
 - ii. National Conference
 - b. Contact Kelli Heflin or Alex Miller for further info
9. Next call scheduled for November 19th
 - a. Need volunteers for
 - i. Safety Moment
 - ii. VPP Element presentation
 - iii. Note taker
 - iv. Group discussion topics
10. Closing comments
 - a. Desire to continue to expand group
 - b. Include additional Technologies (solar, hydro, etc.)
 - c. Consider mentoring non-VPP sites into the program
 - d. Consider measuring success by evaluating the number of successful recertifications and initial certifications of group members