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OSHA Listens

Voluntary Protection Program Perspective from Special Government Employees

While Clean Harbors has gained significant value in decreasing their severity rates and workmen's compensation rates, the real value that we have found is through our personnel becoming directly involved with OSHA through the Special Government Employee (SGE) partnership. Currently, we have five SGEs. Below are the comments from our SGEs regarding the value they have found through their SGE experiences.

Floyd Williams is a Health and Safety Manager located at the Clean Harbors Spring Grove Resources located in Cincinnati, OH. He has worked for Clean Harbors since 1993 in various capacities. He currently oversees the health and safety of 3 locations. They were admitted as a VPP Star Site in August 2007. He became a SGE in August 2008.

Community of Knowledge - There are organizations and conferences of all types for professionals to share ideas and experiences, however, none as exclusive as the SGE community. Each time you encounter a fellow SGE it is a learning moment. It seems we each have our strengths honed by the industries we represent. The perspective that is shared is unlike any other meeting or discussion because we witness each others work. The sharing of ideas can be done on paper, however, the process, the focus, and the methods are only truly communicated through sharing experiences.

Focus on Systems – It is the system that makes the safety program and being a SGE focuses on that premise. In the evaluation process, the SGE moves beyond the simple safety inspection. The true goal is to identify the closed-loop systems that are in place that in essence check themselves. The system will look for holes or deficiencies and determine if the employees understand and use the system. In doing this review, the SGE has no choice but to mentally do the same processes at his or her sites and envision the solutions they witnessed at the evaluation site.

Know who OSHA is - In many ways it is easy to make a judgment on an organization. It is in our nature to generalize and categorize groups and then make decisions on our approach to interacting with them. Being a SGE allow you to be a partner with the OSHA organization. It gives you the ability to personally know the representatives, and most importantly, it re-enforces that we are striving for the same goal. How do you know you're a SGE? when you check the fire extinguisher at the supermarket for its annual and monthly inspection.



Greg Sebastian is a Sr. Health and Safety Manager located at the Clean Harbors Reidsville, NC facility. He has worked for Clean Harbors since 2005 and currently oversees the health and safety of several fixed plant locations. The Reidsville facility was admitted as a Carolina Star Site in 2008.

One of the values I have seen is the actual interaction, learning, networking process between the SGEs and the OSHA personnel for whom we work with on the evaluation. In my last evaluation in Virginia, the OSHA personnel knew the technical side of the regulations, however, it wasn't until we were sitting around the table during the day and at dinner did the OSHA personnel understand how we, as industry, apply the "management" side of the regulations.

Jim Fegenbush is a Health and Safety Manager for Clean Harbors, located in Cincinnati, OH, and covering several field services locations. He is a former employee of Delta Airlines and became a SGE while in their employment.

VPP has always been about developing a cooperative relationship. But it has gone beyond just the relationship between OSHA and employers. As an SGE, I have been fortunate enough to have companies (sometimes even competitors) open their doors to share their best practices and their passion for making things better. There are truly no secrets in safety, and the experience I have gained from other safety professionals has had a direct impact on our employee morale and injury rate. All employees (Moms, Dads, Sons, Daughters, etc.) are more productive, happier and they are getting hurt less. VPP is the only platform that could make this cooperative environment possible.

SGE's are not the only ones to benefit from this cooperative relationship. By volunteering our time to provide "free" labor for OSHA, SGEs are also sharing knowledge and experience with the OSHA inspectors. The result is better inspectors in the field for OSHA. I have worked with OSHA professionals who have told me, among other positive comments, that the experience has been "priceless" and "eye opening".

In the end, everyone wins. For a small investment, employers improve the workplace and see the result on the bottom line. Everyone is working together to provide a safer work environment. OSHA has a resource that provides manpower and experience at no cost. I look forward to continued opportunities to learn, share knowledge and offer my support to keep our workforce safe.

Marc Mason is a Regional Health and Safety Manager located at the Clean Harbors Baltimore, MA facility. He oversees the health and safety of several fixed facilities and manages several H & S Managers within clean Harbors. The Baltimore Facility was admitted as a Maryland VPP Star Site in May 2009 and he became a SGE in August 2009.

The cross-industry audit experience enhances safety for all businesses and SGEs involved.



Jody Reinhart is a Regional Health and Safety Manager located at the Clean Harbors Lone Mountain Facility located near Waynoka, OK. She has worked for Clean Harbors since 1985 in various capacities, and currently oversees the health and safety of 10 locations. The Lone Mountain Facility was admitted as a VPP Star Site in June 2005 and she became a SGE in January 2006.

Since becoming a SGE, I have been privileged to participate in the VPP audits of renewal of three Star Sites and three new VPP applicants. Since my company does not limit the geography of where my VPP audits to be conducted, I have been able to work in two different regions with 3 different VPP Program Managers.

In conducting audits, there are three groups of personnel who interact during an audit: OSHA, other SGEs, and the company being audited. As a SGE, you learn from all three groups. Hearing the different perspectives and applications of a specific regulation, understanding how another company manages a similar risk are just a couple of examples of how the learning and knowledge sharing is so valuable. While working along side all three groups, open, collegial discussions are held on how to protect employees.

Continuous improvement is the ultimate outcome of VPP. The knowledge that is gained by working with OSHA, other SGEs, applicant sites, or VPP Star sites is getting to bring those experiences back to our worksites to enhance the safety and health protection of not only our VPP site, but the other locations within my oversight, along with the larger perspective of sharing throughout the entire company. During audits, we conduct "R&D" work (a.k.a., rip-off and duplicate), and we learn other company's best management practices.

As a SGE, the skills and knowledge I have gained have allowed me to be a better safety and health mentor to both other Clean Harbors locations in our VPP program and other companies. I am able to communicate to them the expectations of a VPP Star Site, which allows them to be successful in their pursuit, and ultimately, protect their personnel to the highest degree.

While I understand that there are still "bad actors" out in the market place who will only respond to the aggressive compliance efforts by OSHA, the number of workplaces that fit into that category can be minimized by the creation of a higher standard; that is one of the ultimate values that VPP gives to the marketplace. Without the value of VPP in the marketplace, i.e., the "cream of the crop", the improvements needed for the protection of our employees' safety and health are not forced to be in place by that market.