*This application is used for training purposes only! Several sections have been deleted, and other sections have been changed to create deficiencies making it unacceptable for VPP application. DO NOT share this application with any sites interested in applying for VPP, for mentoring purposes, etc.*

**General Information**

Company Name: Brody Electronic Systems and Facility Equipment, Inc.

(BESAFE, Inc.)

P.O. Box 7777

Safe City, Texas 77777

Site Manager: Lee P. Iacocca

Manufacturing Manager

VPP Contact: Brent Timely

VPP Team Lead

(361) 333-9999

Number of BESAFE employees: **150**

Number of Contract Employees: **Approximately 30**

Collective Bargaining agent: **United Electrical Workers, Local 1969**

Type of Work performed:

**BESAFE, Inc. is primarily engaged in the manufacturing of relays, motor starters and controllers, and other industrial controls and control accessories. The company has been in business for over 50 years and began producing their first control devices in Mr. Wilson’s barn. The company now operates in a 300,000 square-foot facility producing over 6,000,000 control devices a year. Mr. Wilson’s barn is now used as the corporate headquarters.**

Site NAICS: **362511**

Total Injury/Illness Incidence Rates (TCIR)

# Site Employees

TABLE 1

|  |  |  |  |
| --- | --- | --- | --- |
| **Year** | **Hours Worked** | **Total Recordable Injuries/Illnesses** | **TCIR** |
| **1** | 2,427,106 | 36 | 3.0 |
| **2** | 2,275,045 | 58 | 5.1 |
| **3** | 2,170,000 | 97 | 8.9 |
| **Jan 1 to Mar 30** | 707,400 | 63 | 17.8 |

Site 3-year Rate Years 1-3: **5.6**

Current BLS Industry Average Rate for NAICS 362511: **5.0**

Contract Employees

Table 2

|  |  |  |  |
| --- | --- | --- | --- |
| **Year** | **Hours Worked** | **Total Recorded Injuries/Illnesses** | **TCIR** |
| **1** | 2,335,196 | 13 | 1.1 |
| **2** | 1,984,392 | 8 | 0.8 |
| **3** | 2,482,937 | 19 | 1.5 |
| **Jan 1 to Mar 30** | 684,403 | 4 | 1.2 |

Site 3-year Rate Years 1-3: **1.2**

Current BLS Industry Average Rate for NAICS 154000-: **9.5**

Days Away, Restricted/Transferred Case Rate (DART) rate:

Site Employees

TABLE 3

|  |  |  |  |
| --- | --- | --- | --- |
| **Year** | **Hours Worked** | **Injuries/Illnesses w/ Days Away from work &/or transferred activity** | **DART** |
| **1** | 2,427,106 | 36 | 3.0 |
| **2** | 2,275,045 | 22 | 1.9 |
| **3** | 2,170,000 | 10 | 0.9 |
| **Jan1 to Mar 30** | 707,400 | 3 | 2.0 |

Site 3-year Rate for Years 1-3: **2.0**

Current BLS Industry Average Rate for NAICS 362511: **2.0**

Contract Employees

TABLE 4

|  |  |  |  |
| --- | --- | --- | --- |
| **Year** | **Hours Worked** | **Injuries/Illnesses w/ Days Away from work &/or transferred activity** | **DART** |
| **1** | 2,335,196 | 13 | 1.1 |
| **2** | 1,984,392 | 8 | 0.8 |
| **3** | 2,482,937 | 19 | 1.5 |
| **Jan 1 to Mar 30** | 684,403 | 4 | 1.2 |

Site 3-year Rate for Years 1-3: **1.2**

Current BLS Industry Average Rate for NAICS 154000: **4.3**

Management Leadership and Employee Involvement

Management Commitment

BESAFE, Inc. management is committed to protecting the employees from risks in the workplace. The Environmental, Health and Safety Policy and Principles (see attachment 2-1.1) states the Company’s commitment to the safety and health of all employees. BESAFE’s safety policies, procedures and entire safety program are designed to prevent injuries and are critical to the safe operation of the facility.

BESAFE’s EH&S policies are developed to manage all operations in a manner that protects the environment and the safety of employees, customers, contractors and the public.

BESAFE’s Guiding Principles state that a safe and healthy work environment will be maintained for all employees, contractors and neighbors and is vitally important to the successful operation of our business. Management and employees must jointly make reasonable efforts to provide such a work environment.

BESAFE, Inc. believes:

- Our goal is to prevent all accidents and injuries;

- Every person is responsible for prevention of injuries and accidents;

- Training is required to provide a healthy and safe work environment;

- Safeguards must be provided and utilized where risk cannot be eliminated;

- Employee involvement will be used to implement our safety and health system;

- Safety adds value to our business;

- Working safely is a condition of employment;

- Known operational risks must be identified, avoided and controlled to prevent injuries, work-related illnesses, fires, property damage, and other losses as and integral part of our business;

- Employees and contractors are responsible for complying with all health, safety, and environmental laws and regulations and with company policies and procedures as a condition of employment;

Specific goals are set every year for health and safety (see attachment 2-1.2). Goals are determined by previous year average rates. Using these rates the “bar is raised” to continually improve our safety and health record. The Facility Leadership Team will review past performance and establish these goals for safety and health performance. The Central Environmental Health and Safety Council will review these goals and set the objectives needed to achieve them.

Organization

Safety and Health is an integral part of BESAFE, Inc. at all levels. Every employee has Safety and Health Roles and Responsibilities. The basic Safety and Health Roles and Responsibilities of BESAFE, Inc. personnel are outlined below. An organizational chart is included, see attachment 2-2.1.

**Manufacturing Manager is responsible for**:

-Creating the necessary culture to make safety the first and foremost priority;

- Implementing and institutionalizing BESAFE’s six-point safety philosophy.

**Safety and Health Manager is responsible for**:

- Providing strategy input and direction to ensure improvement of BESAFE’s safety and health processes;

- Leading the safety process and establishing a culture where safety ownership rests with the employees;

- Continuous improvement of the safety programs;

- Assisting line organizations build good safety awareness and attitudes;

- Maintaining the safety focus on progress, not activity.

Every employee is responsible for following facility safety and health policies. We exercise this responsibility by following plant policies and procedures and ensuring that safety is a key consideration for every action taken. Employees are expected to support all safety and health proactive programs and committee actions. Employee’s Roles and Responsibilities are included. (See attachments 2-3.1, 2-3.2, 2-3.3, 2-3.4, and 2-3.5).

VPP Commitment

Management has committed all necessary resources to maintaining the elements required for the VPP. All necessary staff has been dedicated to the process, and management fully supports the VPP Committee charged with overseeing the implementation of the safety and health program and ensuring its progress. Management has included a signed statement of Assurances further showing their commitment to the VPP (See Assurances Statement, attachment 2-2.9)

Planning

Safety and health planning is accomplished on an annual, quarterly, monthly, and daily basis. Safety and health issues are planned through the following means:

**Annually**: Management develops an overall plan for the facility. This plan is referred to as Key Bets. The facility Key Bets (see attachments 2-6.1 and 2-6.2) set yearly goals for safety and health.

**Quarterly**: Information sharing meetings are held on a quarterly basis to update employees on facility safety and health issues. Information sharing meetings are an open forum where any question can be raised and answered by corporate and/or plant management.

Written Safety and Health Program

The company maintains all necessary written documentation of our safety and health program. All written procedures are available for review. All training documentation is available on site, as well as all documentation of our hazard correction tracking system. All written programs including, but not limited to, hazard communication, hearing conservation, lockout/tagout, etc. are also available.

Top Management Leadership

Management has shown leadership in the safety and health program through their active participation in information sharing meetings, new employee orientation, safety meetings, the Central Environmental Health and Safety Council and scheduled training. The plant manager visits the work areas often to visit with employees to discuss their concerns regarding safety and health, and encourages employees to visit him at his office at any time. All management representatives set an excellent example of safety behavior by wearing all appropriate safety and health PPE, and following all applicable safety and health rules.

Authority and Resources

BESAFE, Inc. management recognizes considerable resources are necessary to maintain an effective safety and health program. The Safety Department maintains a qualified staff of safety and health professionals that include: industrial hygienists, safety specialists, an emergency response coordinator, and a medical coordinator.

The company also realizes the importance of giving proper authority to those individuals charged with safety and health responsibilities to carry out their duties in an effective manner. Each individual involved in the safety program has the authority to make any safety decision necessary to create a safe work environment. If a safety or health decision made by an employee with safety and health duties as a part of their work assignment is overturned by a supervisor or other manager, the supervisor or manager overturning the decision has the responsibility of explaining his actions to the plant manager who strongly discourages overturning safety and health decisions. All employees are given the authority to approach any employee, contractor, or manager who they feel is conducting their work in an unsafe manner and address the situation. Employees are also given the authority to stop any job they recognize as unsafe with no fear of reprisal.

Line Accountability

Accountability for managers, supervisors, exempt and non-exempt salaried, and hourly employees is accomplished through the use of:

Semi-annual performance review (see attachment 2-4.1);

Line of Sight review (see attachment 2-4.2).

Working safe is a condition of employment at the facility. The Facility Leadership Team has identified five essential practices that all employees must follow in their effort to protect themselves, their coworkers, and the environment. The following is a list of the five essential practices that all employees must follow:

1. The Safe Work Permit Procedure must be flawlessly executed in the following areas:

- Personal Protective Equipment

- Hot Work

- Confined Space

- Energy Control

2. All safety and health incidents and near misses must be reported immediately;

3. Proper Management of Change procedures;

4. All safety and health procedures;

5. All conduct regarding safety and health issues must meet BESAFE’s expectation that all business affairs will be conducted lawfully and with integrity and honesty.

Policy KSP-000 (see attachment 2-4.3) defines the essential practices.

Employee Notification

Employees are notified of participation in the Voluntary Protection Program and OSHA rights in numerous ways. Employee notification is conducted using formal and informal communications. The types of communication methods BESAFE, Inc. uses includes, but is not limited to, New Employee Orientation, Information Sharing Meetings, Safety Meetings, Weekly Newsletter, Corporate Newsletter, Letters and Memos, Electronic Media.

All employees have been informed that becoming a VPP site does not diminish their rights under OSHA. Employees have also been advised of the benefits to the company and themselves.

Attachments include:

- Employees Rights under OSHA 2-9.1

- Notification Letter 2-9.2

Employee Involvement

**Safety and Health Committees**

BESAFE, Inc. employees are actively involved in the safety and health programs and participate in the following ways: Safety and Health Councils and Teams; Central Environmental Health and Safety Council (CEHSC); Environmental Safety Culture Team (ESCT); Hazard Recognition Team (HRT); Job Safety Analysis (JSA); VPP Team; Contractor Safety Committee.

Annual Self-Evaluation

The Program Evaluation Participants took a critical look at the requirements of the Voluntary Protection Program and based their information on the application process.

Annual self-evaluation is included, see attachment 2-7.1.

Worksite Analysis

Management Understanding

All members of management understand the hazards each of their respective employees are exposed to. Before a manager can be promoted to a position of responsibility over other areas, he must demonstrate a satisfactory understanding of the hazards of all areas he would be responsible for the plant manager.

Managers gain this understanding of the hazards through the use of Job Safety Analyses, comprehensive surveys of the work areas, by attending hazard recognition training and conducting self-inspections of the work area, etc.

Comprehensive Surveys

Several comprehensive surveys have been conducted to identify all safety, health, and environmental hazards at this site. Surveys conducted included the following surveys conducted by site personnel: a comprehensive industrial survey; confined space survey; PPE survey; energy control surveys; and a safety hazard survey. Corporate personnel also conducted comprehensive safety and industrial hygiene surveys that confirmed the results of the surveys conducted by site personnel.

All surveys conducted are available for review at the site.

Industrial Hygiene Program

The site has a comprehensive industrial hygiene program to protect employees from uncontrolled hazards associated with airborne contaminants, noise, and other industrial hygiene hazards. The site identified all industrial hygiene hazards associated with the work area through comprehensive industrial hygiene surveys conducted by site and corporate personnel. The site developed a sampling strategy to address all of the hazards, frequency of monitoring, necessary follow up of identified hazards, etc. (see attached copy of sampling strategy, attachment 2-2.10).

Pre-Use/Pre-Startup Analysis

Pre-Use/Pre-Startup Analyses are conducted to identify safety, health, and environmental hazards of every new/modified procedure and new/modified piece of equipment before employees begin work using the new or modified procedure/equipment. A written procedure has been developed to provide guidance when reviewing the procedure/equipment to assist the reviewer in evaluating all of the hazards. The review must be conducted by qualified safety and health professionals as outlined in the procedure.

See attached Pre-Use/Pre-Startup Analysis Procedure 2-2.93.

Hazard Analysis

Routine Hazard Analysis is performed in several ways at BESAFE, Inc. using the following tools: Safe Work Permitting; Job Safety Analyses (JSAs); and Standard Operating Procedures (SOPs).

The Safe Work Permit (see attachment 4-4.1) provides guidelines to protect employees and contractors from work hazards and chemicals that they may encounter while performing their job assignment. Flawless execution of the Safe Work Permit is an expectation of every employee and contractor. The Safe Work Permit sets the conditions for a job by addressing specific categories. The Safe Work Permit categories consist of the following: Type of Permit; Job Description; Safe Work; Personal Protective Equipment; Job Procedures to Minimize Exposure; Hot Work; and Confined Space.

Employee Hazard Reporting System

Employees are given the responsibility and ownership to shutdown and to take corrective actions without reprisal if a process or piece of process equipment becomes unsafe. The Supervisors Immediate Report (SIR), Work Order System (IMPAC), Audit Form, BESAFE, Inc. Accident Prevention Program (KAPP) and the Central Environmental Safety and Health Council are tools that can be used to mitigate hazards. The “Employee Safety Concern” is another tool employees may use to report issues to management. Forms for the Safety Concern system are available in several locations throughout the facility including the lunch and break areas, and in each work area. The forms are filled out and placed in a box located next to the blank forms and are picked up on a daily basis. Employees are informed of the actions to be taken by management regarding their concern. If the employee chooses to remain anonymous, the actions taken by management are published in the employee newsletter, and on the employee bulletin board in the lunch room.

The Central Environmental Health and Safety Council (CEHSC) is a source to report safety and health issues to the Facility Leadership Team. This team is used when an employee feels an issue has not been resolved. The employee will contact the CEHSC Leader and explain the situation. The CEHSC Leader will then speak to their RLT Member and have the issue looked into. The RLT Member will research and return a resolution to the effected employees.

Accident/Incident Investigation

All injury/incidents will be reported using the Supervisors Immediate Report (SIR). Facility employees are required to report all injuries/incidents immediately or disciplinary action will be taken. Once the incident is reported, the Supervisor will complete the SIR. The leader of the

Incident Investigation Team will organize the proper personnel and schedule the investigation. There are two types of investigations, Minor and Major. BESAFE, Inc. uses the TapRoot Causal Tree and Market Based Management Problem Solving Process to identify why the injury or incident happened and what steps must be taken to prevent reoccurrence. All action items generated as a result of the investigation are tracked in the BESAFE, Inc. Incident Tracking System (KITS). Completed investigations will be entered in KITS and a Lessons Learned generated. Incidents that result in a recordable injury, reportable environmental event or constitute a large economic loss are reviewed by the Manufacturing Manager and personnel involved with the incident.

A copy of the Accident Investigation procedure is attached: 2-2.5.

Trend Analysis

Trend Analysis is compiled using the BESAFE, Inc. Incident Tracking System (KITS). Data entered into KITS consists of incident reports, incident investigations, safety meetings, behavioral observations, and safety and health audits. Once this data is entered, employees can easily access reports and graphs that reflect data computations. Trends are tracked monthly to identify areas of concern.

Copies of the previous 12 months trending is available as attachment 2-2.6.

Hazard Prevention and Control

Certified Professional Resources

The site has several certified safety and health professionals available for assistance. There is one Certified Safety Professional (CSP) employed at the facility. The site also has access to two other CSPs, and two Certified Industrial Hygienists (CIHs) through the corporate office located approximately 10 miles away.

Hazard Elimination or Control

**Engineering and administrative controls**

Engineering and administrative controls are the primary methods for controlling hazards at the facility. Personal Protective Equipment is used as the primary method of worker protection only after engineering and administrative solutions have been considered. PPE is also used to supplement effective engineering controls. The various types of personal protective equipment provided by the facility are described in the PPE Catalog (see attachments 5-3.1 and 5-3.2) found on the Intranet.

**Safety and Health Rules**

Safety and Health Policies and Procedures (see attachment 5-2.1) have been developed through identifying hazardous work tasks, incident experiences and regulatory requirements. These policies and procedures are published on the BESAFE, Inc. Intranet Safety Homepage and are easily accessible to all employees. A summary of BESAFE’s safety policies and procedures are also published in the Safe Work Practices Pocket Guide which is distributed to each employee during New Employee Orientation. Following safety policies and procedures has long been a condition of employment at BESAFE, Inc. and is stated very clearly in our Employee Responsibility and Accountability for Safety, Health and Environmental Procedure KSP-000.

**PPE**

The PPE Team reviews and approves site PPE needs. The PPE Team is formed on an as-needed basis to determine the PPE that is best suited for the types of potential exposures that exist within our facility. Each type of PPE (such as chemical protective clothing, safety eyeglasses, gloves, harnesses, hard hats, etc.) is evaluated based on overall protection from potential facility hazards.

Preventive Maintenance

A computerized system is used to scheduled and track all preventive maintenance at the site. The “Dilbert” System includes all equipment and machinery requiring preventive maintenance to be performed, and schedules it at the appropriate intervals. The schedule is sent by E-mail to the maintenance manager on a daily basis so work assignments can be made. If the maintenance is not completed in the time allowed by Dilbert, another E-mail is sent to the maintenance manager and the plant manager. The plant manager then ensures the maintenance is conducted in a timely manner.

Hazard Correction Tracking

A tracking system developed by the VPP committee is used to track all hazards identified through accident/incident investigations, self inspections, the employee hazard reporting system, industrial hygiene surveys, etc. The system lists each of the hazards requiring correction, assigns a responsible party, notifies the responsible party by E-mail, and tracks when the hazards were corrected. The system also identifies when it has not been notified of a timely correction, and notifies the responsible party AND his supervisor. The next notification notifies the two previous parties and the plant manager who ensures correction is made.

A sample of the tracking system log is attached - 2-2.11.

Occupational Health Care Program

On-site primary medical care services for the facility are provided by a Registered Nurse, who has a Bachelors’ degree in Nursing, and a corporate Medical Manger who is certified in occupational nursing by the American Association of Occupational Health Nurses. The Medical Director for the facility is a contract physician who specializes in Occupational Medicine. The facility physician is on-site two (2) days a week for12 hours per visit providing him/her opportunity to make recommendations for corrective or preventive measures in the facility’s health program. Any recommendations made in writing to the Medical Department are reviewed and implemented immediately. The facility nurse is on call 24-hours a day seven (7) days a week for evaluations and recommendations and the physician can be reached through his/her answering service as the need arises. On off-hours, trained Emergency Responders administer emergency medical care. Emergency Responders are state certified Emergency Care Attendants, Emergency Medical Technicians, or Paramedics.

Off-site medical facilities are available at three (3) fully staffed hospital emergency rooms located approximately fifteen minutes from the facility. One facility is a level-two-trauma center. All the emergency rooms are staffed on a 24-hour basis. If additional transportation is needed, there are two (2) private ambulance services as well as helicopter service, Halo-Flight, available for extreme emergency needs.

Physical examinations are performed annually in accordance with the requirements of applicable OSHA standards. The facility contracts with Mobile Health Testing Inc. to perform the physical exam and required tests. These are conducted on-site during the employees’ regularly scheduled work hours.

Emergency Procedures

**The Emergency Response Plan**

The Emergency Response Plan (see attachment 5-5.1) is a written program that involves plans for handling unexpected operational incidents. The Emergency Response Plan for the facility is based upon the principles of preparing for an emergency. The objectives of the manual are to Prevent injuries to employees, contractors, visitors and the public; Minimize the impact of an emergency; Minimize disruption to the facility operation; Define Facility Terminal Fire Company and Emergency Response Teams actions and responsibilities; Coordinate facility emergency response; Ensure timely notification; Establish guidelines for compliance; Ensure that appropriate records and documentation are maintained.

The Emergency Response Plan covers the following types of emergency situations: Fire and/or Explosions; Oil or hazardous materials spills; Hazardous gas releases; Natural disasters; Bomb threats; Major incidents; Sabotage; Civil disturbances; Utility Outages.

Drills are held several times throughout the year to ensure all employees have the opportunity to participate. The system used to track employee training is also used to track the employees who have participated in the emergency drill.

Safety and Health Training

Employees

BESAFE’s formal Safety and Health Training Programs include our New Employee Orientation and the Safety Regulatory Refresher. New employee orientation includes training on the following subjects: Bloodborne Pathogens, Hazard Communication, Hearing Conservation, MSDS Awareness, Medical and Exposure Records, Occupational Injury & Illness, PPE Awareness, Portable Fire Extinguisher.

Employees whose primary job responsibilities require them to work in the facility receive the above-mentioned General Safety Core Curriculum in addition to a full day of Safety Expectations that include the following topics: Asbestos Management (In Permitting), Benzene Safety (In HAZCOM), Confined Space Entry, Confined Space Entry Attendant, Confined Space and Area Monitoring, Energy Control Program, Excavation and Trenching, Scaffold Safety, Hot Work, Hot Work Fire Watch, OSHA Electrical Non-Qualified, Lead Protection, Respiratory Protection, Radiation Safety.

Following this training, employees are given an exam and allowed to review the graded exam with the instructor and given opportunity to ask questions and receive feedback.

Annual Safety Regulatory Refresher Training. All employees are assigned computer based Safety Training annually. Job dependent, the Safety Training includes, at minimum, the General Safety Core Curriculum mentioned above, as well as any or all of the Safety Expectations topics also mentioned above. Each course is comprised of a computer based lesson that reiterates the topic information learned in New Employee Orientation and a test. In order to complete the course (lesson and test), employees will first have to view the lesson material and then successfully complete the test with a score of 80%. Employees are encouraged to contact either their supervisor or the Safety Department if they have questions on any material. See attachment 6-1.1.

BESAFE’s informal Safety and Health Programs consist of department and facility wide safety meetings. Employees are encouraged to present safety topics that apply on the job as well as off the job. Please see the attachment 6-1.2 for a list of sample topics.

Supervisors and Managers

BESAFE’s Supervisor Training Program is designed to provide Facility Shift Managers and Production Leaders with field training that relates to their safety, health and training roles and responsibilities. All subjects are covered during an 80-hour training period every three (3) years. Training is “hands-on” and completed with representatives from the Safety and Health Department.

Emergencies

Employees, managers, contractors, and visitors are trained on the emergency procedures. Employees and managers are trained on all appropriate information discussed above. Visitors are required to watch a video on their responsibilities during an emergency. Unescorted visitors are required to review the entire emergency program and attend all training required of any other employee, manager, or contractor.