

# On-Site Consultation Services

A look into how Reynolds Polymer achieved SHARP status

**Reynolds**  
POLYMER TECHNOLOGY, INC.

*Building the Impossible*

# Reynolds Polymer Technology

Currently employs 119 employees in our Grand Junction facilities  
NAICS Code 326113 (Manufacturer of Unlaminated acrylic sheet)

- Chemical hazards
- 6 gantry style cranes
- 7 powered industrial trucks
- On-site welding shop
- 4 CNCs, and 2 gantry style sanding machines

# First Steps:

- OSHA 2012 violation abatements achieved
- Call made to On-Site Consultation Services
- Inspection planned and scheduled

# February 2013 Inspection

- Opening Conference
- Inspection
- Program/ Injury and Illness Records & Rates review
- Form 33
- Closing Conference

# What is Form 33?

## Safety and Health Program Assessment - Blank Form 33

Request Number		Visit Number		Visit Date	
Employer					
Site Location					
<b>Legend:</b> 0 = No; 1 = No, Needs major improvement; 2 = Yes, Needs minor improvement; 3 = Yes; NA = Not Applicable; NE = Not Evaluated * = Stretch Items					
<b>Hazard Anticipation and Detection</b>					
	0	1	2	3	NA NE
1. A comprehensive, baseline hazard survey has been conducted within the past five (5) years.					
<b>Comments:</b>					
2. Effective safety and health self-inspections are performed regularly.					
<b>Comments:</b>					
3. Effective surveillance of established hazard controls is conducted.					
<b>Comments:</b>					
4. An effective hazard reporting system exists.					
<b>Comments:</b>					

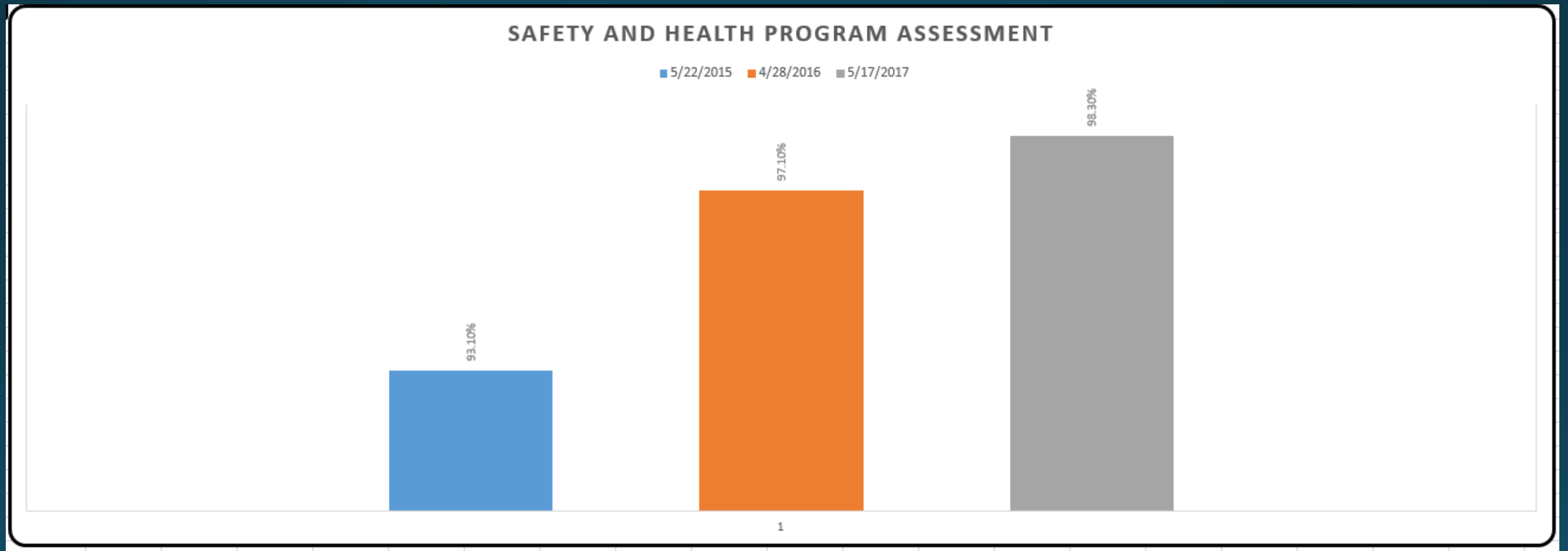
# Safety and Health Program Assessment

- Hazard Anticipation and Detection
- Hazard Prevention and Control
- Planning and Evaluation
- Safety and Health Training
- Management Leadership

Scored rated from 0 to 3

Rates your safety management system

# Reynolds Polymer Form 33 scores



# 2013 Inspection Results

- Several violations were found
- Incident rates too high to be eligible for the program
- Low scores on form 33 showed safety management system to be based on compliance/ lagging indicators

## New leadership in Q4 of 2013

- Director of Quality and Safety added
- Merging of Quality, Safety, and Continuous Improvement Team
- New leadership focus on much needed education for the team

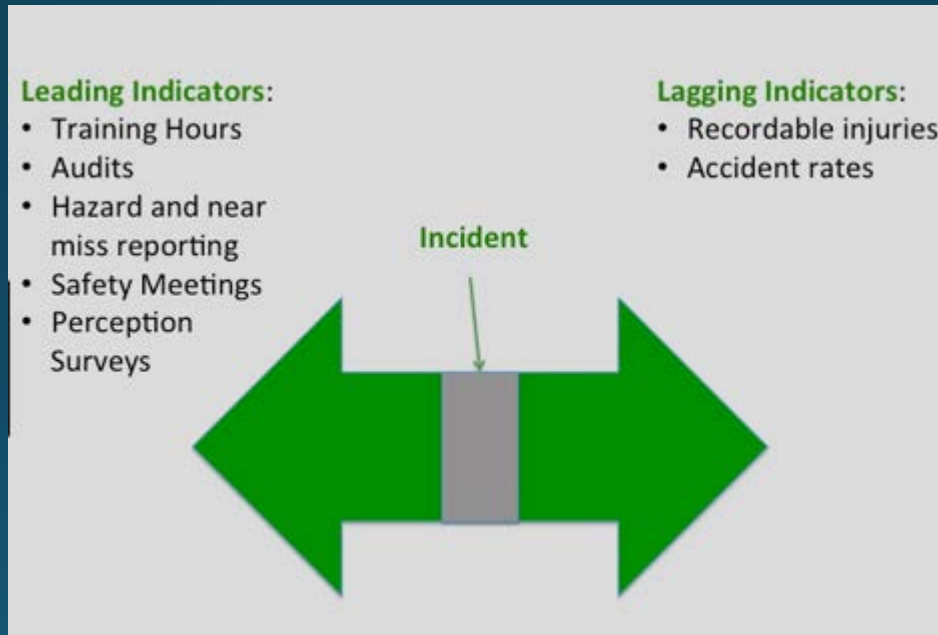
# What next?

- Hazard abatement
- Submit reports closing out SHARP audit
- Lower incident rates... How?

# In 2015 Reynolds Polymer implemented a proactive safety management system using leading indicators

- Compliance is not enough... Focus on injury and illness prevention, and hazard analysis & abatement
- Investigation of near miss incidents... Apply root cause & corrective action before it causes an injury or illness
- Measure safety and health objectives with leading indicators
- Quality and Safety management systems integrated using Lean Six Sigma principals, and Plan Do Check Act methodology
- Promote behavioral safety, and most importantly lead by example (this means everyone from the CEO to the janitor)

# What is a leading indicator?



# The Campbell Institute:

The Campbell institute defined characteristics of a successful leading indicator.

- Executive buy-in on (not technical knowledge of) leading indicators
- Roll-up and use of leading indicators at the corporate level
- Communication and understanding of the predictive value of leading indicators by EHS and corporate leadership
- Targeted leading indicator data collection used to analyze specific measurable actions rather than collected prior to development of response actions

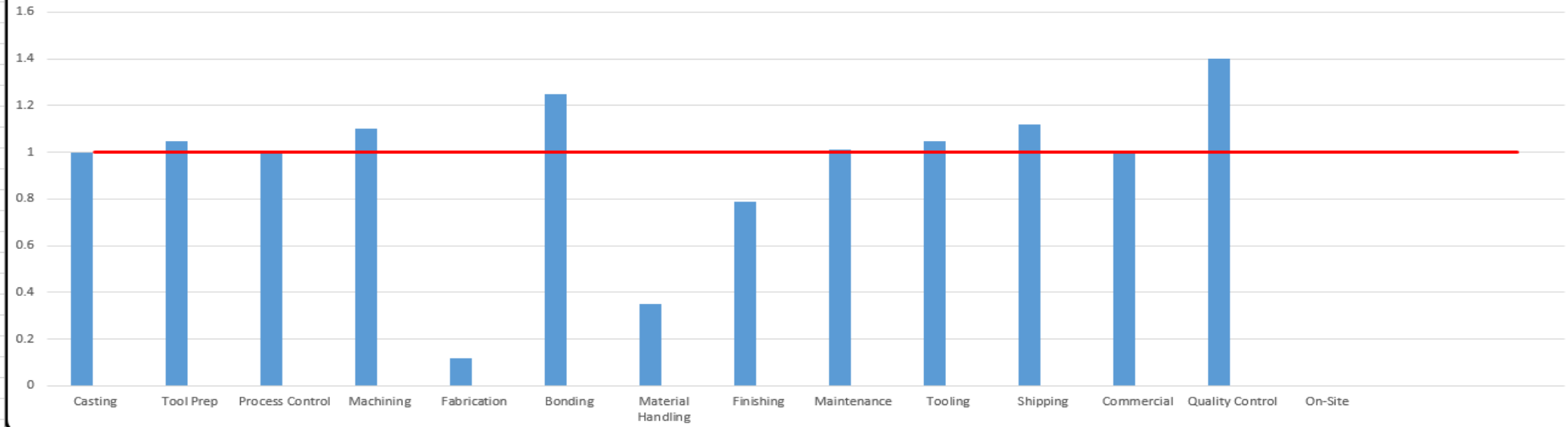
# Institute members and partners recommend other organizations:

- Look at what is already being measured and determine whether it could be a leading indicator
- Just get started; do not spend too much time deliberating which leading indicators to track
- Make sure indicators communicate meaningful and actionable information
- Obtain leadership support
- Integrate leading indicators into the overall safety management system

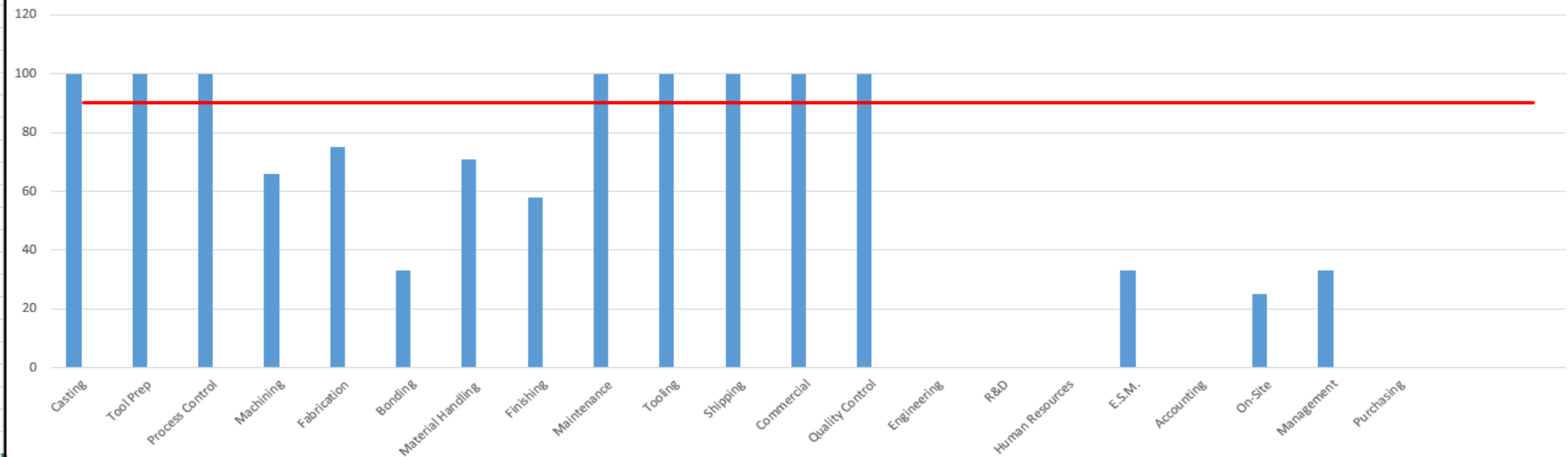
# Leading indicators used in Reynolds Polymer's Safety Management System

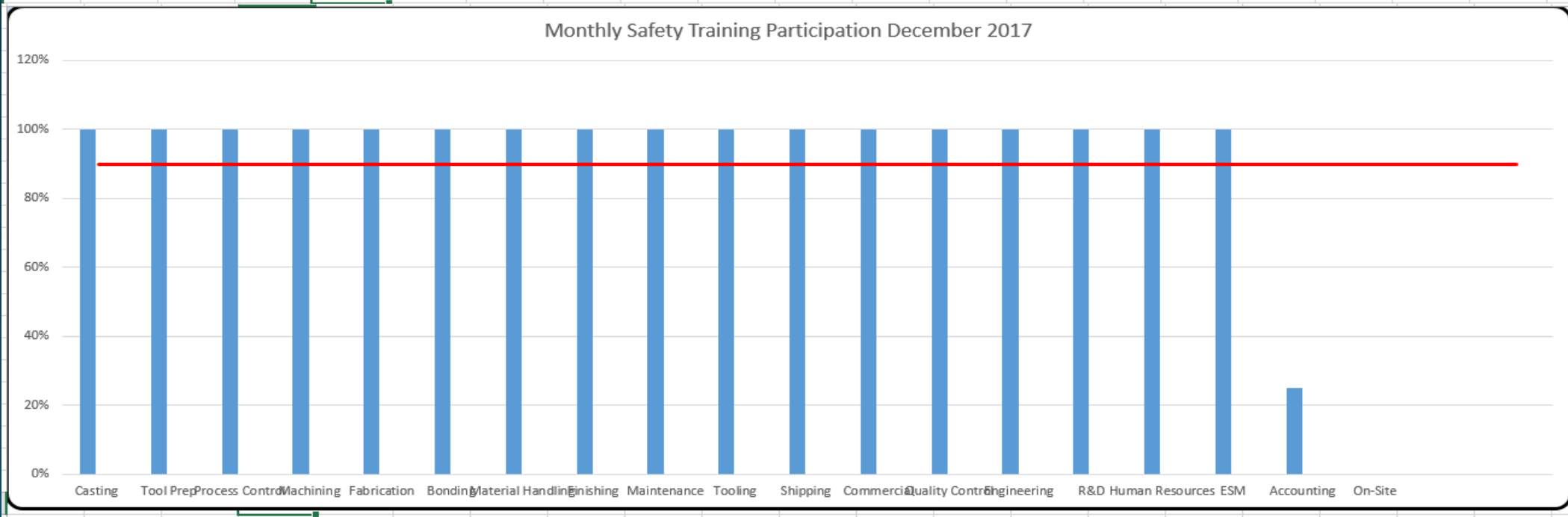
- Departmental monthly safety training participation (toolbox talks)
- Departmental JSA participation
- Formal safety observation participation (STOP Cards)
- Documented monthly safety audits on management and employee levels
- Near miss reporting metrics
- Safety committee notes & 3W plans

JSA Participation per Department December 2017



STOP Card Participation December 2017





# How the leading indicators are used in the Reynolds Polymer Safety Management System

- All indicators are measured, and reported out at the end of each month
- Supervisors leading departments that show poor participation levels in the safety management system are held accountable
- Departmental safety management system participation is posted on the shop floor for all to see
- Leading indicators are aligned with the Annual Operating Plan, and reported to executive management quarterly along with relevant lagging indicators

# Employee Training

Education & empowerment:

All RPT employee undergo 8 weeks of safety training including

- OSHA 10 hour training
- STOP Safety Training
- 6S Introduction

This is on top of OSHA required training including:

- Respiratory protection
- Hazard Communication
- LOTO
- Powered Industrial Trucks

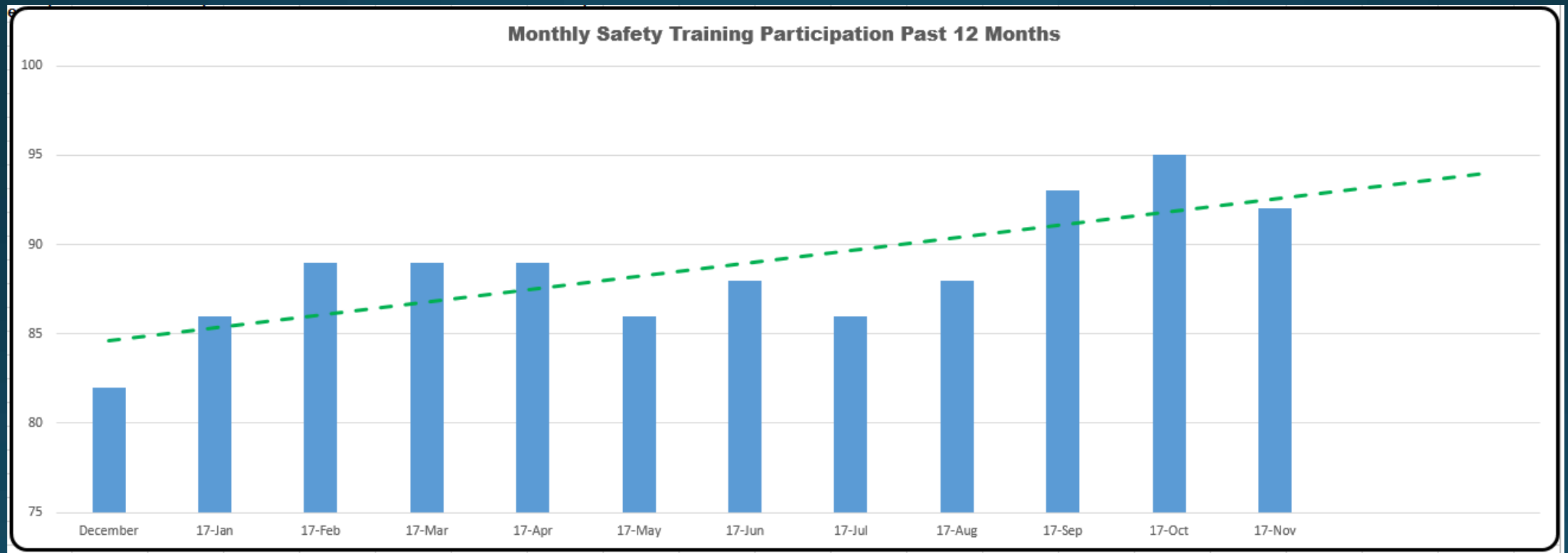
# Employee Involvement

- Employee participate in accident investigations, and are asked for their input on hazard abatement
- Hazard abatement efforts are communicated with the employees who identified the hazards immediately
- Employee are recognized for outstanding safety efforts
- Employees are encouraged to report near misses, and unsafe conditions. Employees are educated on how this information is used to improve their working environment
- All employees are taught stop work authority, and all parties involved participate in hazard abatement

# Finally... Document, document, document

- Safety management system manual
- Procedures (OSHA Programs)
- Work instructions include safe operating procedures
- Supporting forms (Near miss, accident investigation, 300 Logs, etc.)

# A good upward trending leading indicator...

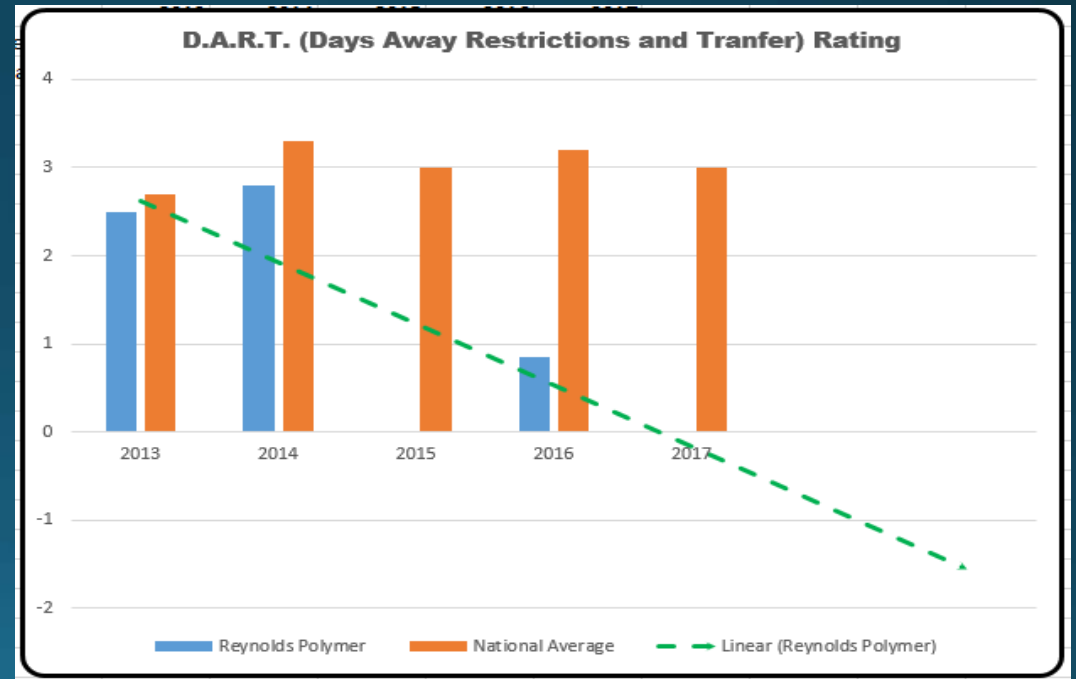


# Will lead to a downward trending lagging indicator.

## Total Recordable Loss

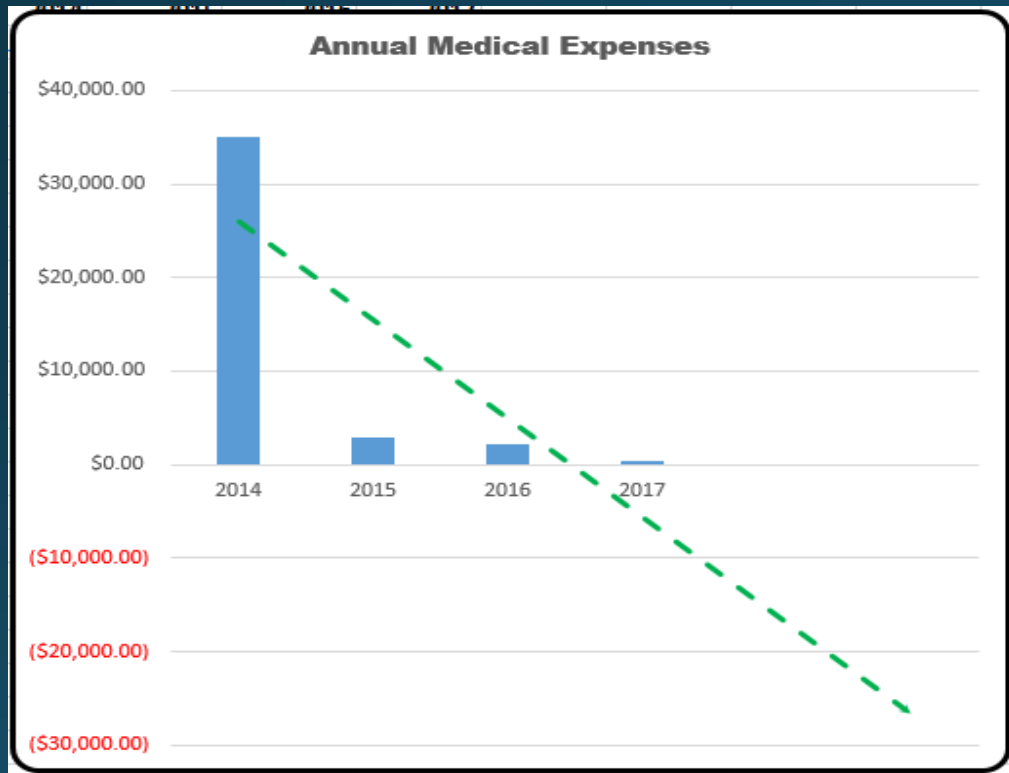


## Days Away Restrictions and Transfers

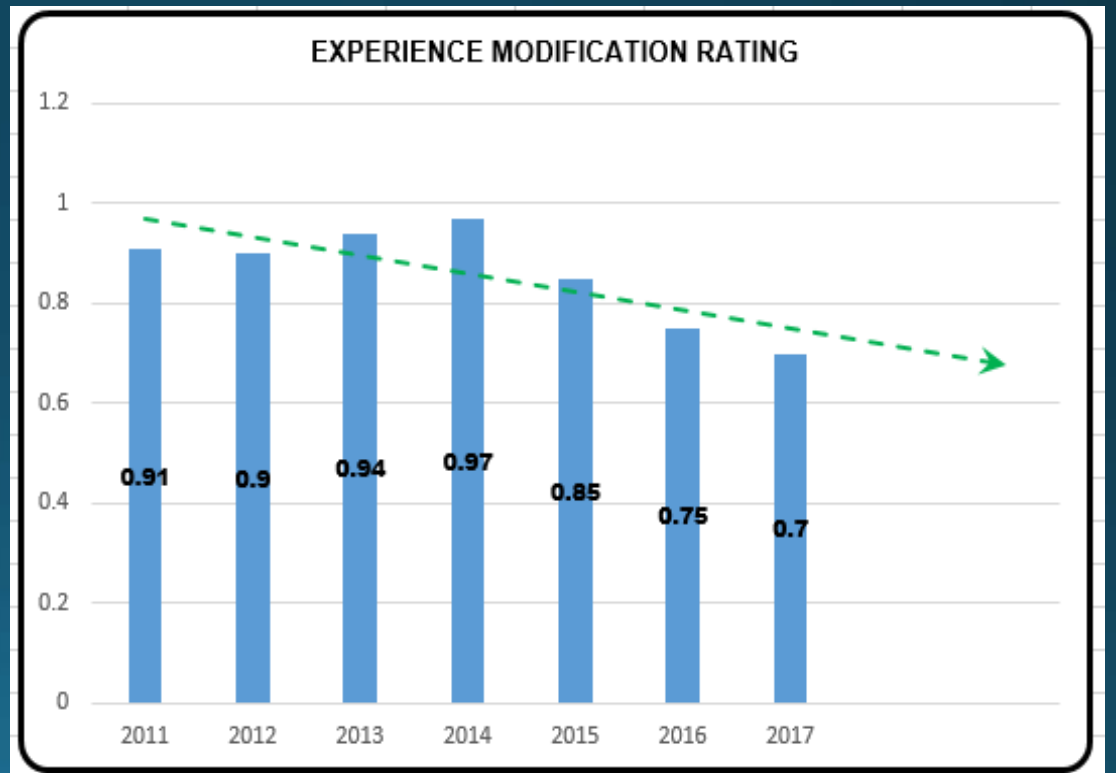


# ...And many other benefits!

## Lower Medical Bills



## Lowered Workman's Comp Premiums



# Next steps

- No SHARP inspection was planned in 2014 as we were implementing our safety management system
- Form 33 was utilized to close the gaps in our safety management system. Action items were assigned and tracked through 3W plans
- It took about a year and a half to fully implement our safety management system. It was rolled out January 2<sup>nd</sup>, 2015 after executive approval with an all employee lunch, T-Shirts were handed out to commemorate and visualize the effort, and a 30 minute training was presented at the lunch with a question and answer period at the end

# 2015 SHARP Inspection

- SHARP auditors inspected our facilities again in 2015
- Only a few hazards were found, and were quickly abated
- Reynolds Polymer's safety management system was assessed using form 33, and received a passing grade (93.1%).
- Incident rates were still too high for RY 2014 to be accepted into the program, but as a result of the implementation of our safety management system Reynolds Polymer had no recordable injuries for RY 2015

# 2016 SHARP Inspection

- SHARP auditors inspected our facilities again in 2016
- Only 2 hazards were found in both of our facilities
- Reynolds Polymer's safety management system was assessed using form 33, and received a passing grade (97.1%).
- Incident rates were finally low enough, and Reynolds Polymer became a SHARP certified company on August 3<sup>rd</sup>, 2016 after acceptance from the Denver Regional Administrator of the Occupational Safety and Health Administration (OSHA)
- Reynolds Polymer was accepted for a 1 year cycle

# 2017 SHARP Audit

- SHARP auditors inspected our facilities again in 2017
- No hazards were found in either of our facilities
- Reynolds Polymer's safety management system was assessed using form 33, and received a passing grade (98.3%).
- Reynolds Polymer was accepted for a 3 year cycle

# What is SHARP?



# S.H.A.R.P.

Safety and Health  
Achievement  
Recognition Program

An OSHA cooperative  
program



## What does SHARP do?

- Recognizes small employers who operate an exemplary safety and health management system
- Singles out organizations as a model for worksite safety and health
- Exempt from programmed inspections during the period that SHARP certification is valid
- Currently there are 41 SHARP facilities in Colorado with 2 of them in Grand Junction



What most people hear...

- Blah blah blah blah blah
- Blah blah blah blah blah
- **EXEMPT FROM  
OSHA  
INSPECTION!!!!**
- Blah blah blah blah blah



What that actually means...

- You facility WILL be exempt from programmed inspections for the time period that your SHARP certification is valid.
- It does not mean that OSHA cannot inspect your facility for any reason at all.
- Programmed inspections are the 4<sup>th</sup>, and lowest priority of OSHA inspections.

## OSHA Inspection Priority

Priority	Category of Inspection
1st	<b>Imminent Danger:</b> <i>Reasonable certainty an immediate danger exists</i>
2nd	<b>Fatality/Catastrophe:</b> <i>Reported to OSHA; inspected ASAP</i>
3rd	<b>Complaints/Referrals:</b> <i>Worker or worker representative can file a complaint about a safety or health hazard</i>
4th	<b>Programmed Inspections:</b> <i>Cover industries and employers with high injury and illness rates, specific hazards, or other exposures.</i>



# So what are the benefits of SHARP Certification

- Lowered Injury and Illness Rates
- Lowered Workman's Compensation Premiums
- Compliance Assistance
- Prevent loss on your worksite
- Reduction of lost work days
- Improved employee moral
- It's **FREE!!!**



Sounds great! Where do I sign up?

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