

First Quarter, 2011  
Volume 1, Issue 14



# PPSA Quarterly Review

Pulp and Paper Safety Association (850) 584-3639

Website [www.ppsa.org](http://www.ppsa.org)

## ***Special Interest Articles:***

- Chairman's Letter
- 2011 Conference  
SAVE THE DATE
- 2011 Conference  
Program
- Legal Corner – NEW!!
- Safety
  - Safety  
Awards
- Ergonomics
- About Us

## ***Individual Highlights:***

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Temple-Inland Photo Gallery  
Orange, TX

## A Letter from Our Chairman



### Current Activities 2011 Focus

These are exciting times for the PPSA organization. Board members met in Memphis, TN recently to look back on the significant progress we have made as an organization over the last three years and also look forward to ensure that we have plans in place for continuously improving the services that we provide for members. Listed below are our planned objectives which we will use to measure our progress in the future and meet our commitment to our members.

We will position the PPSA to become the primary health & safety resource for the Forest Products Industry. We will do this by:

- *Executing a professional 2011 Safety Conference which:*
  - *is well received by our members and vendors*
  - *increases attendance by 20% over 2010*
- *Remaining fiscally responsible and financially stable*
- *Implementing an alliance with AFPA which promotes PPSA as the provider of safety technical expertise to AFPA and PPSA members*
- *Providing members with opportunities to interface with quality, state-of-the-art vendors who provide services and products to our industry*
- *Continuing to develop the PPSA website as a preferred reference for safety information*
- *Providing forward looking safety and regulatory updates every quarter which identify critical issues and opportunities for our industry*
- *Providing accurate and timely statistical data for company and member comparisons*
- *Increasing company memberships to ensure that the PPSA represents the majority of stakeholders in the industry (10% increase in membership year over year)*
- *Hosting training seminars on a quarterly basis covering important topics for members*
- *Providing comments as appropriate on pending OSHA regulatory changes which will impact our industry*

The board will provide updates on our progress each quarter.

### **2011 Conference**

- Planning has begun for our 2011 conference which will be held in beautiful downtown San Antonio the week of June 19–22, 2011.

### **Partnership with AFPA**

- Recognizing and leveraging the strengths of both AF&PA and PPSA to co-publish statistics and work collaboratively to better understand and influence regulatory affairs. AF&PA will collect and report the benchmarking data for mid-year and year-end periods. We are committed to meet a schedule that will provide timely data for our members. Since AF&PA is now working on a substantially reduced budget for their health & safety committee, the PPSA Board of Directors has increased our budget for Legal/Legislative activities allowing us to include regular updates for our members through webinars and quarterly reviews.

### **Training Seminars**

- Discussion on the use of webinars as short topics or preliminary information for conference topics led to forming a plan for two webinars. A webinar is scheduled for March 7, 2011 with Larry Halprin providing a Legislative Update. We are also looking into a session on Hearing Conservation, which will address octave band measurements along with other items. We will provide more details as plans progress.

**General Chairperson – PPSA, Chris Redfearn**





**If you haven't signed up already...  
time is running out**

**Plan to attend the 68<sup>th</sup> Annual Pulp & Paper Safety Association  
Safety & Health Conference at the Hyatt Regency  
San Antonio, TX June 19 – 22, 2011**

**There's a new "Sheriff in Town" and he's looking to get OSHA back into the enforcement business.** The 2011 professional development conference will focus on recent regulatory developments, their impact on the Forest Products Industry, and how you will meet this challenge. In addition, the conference is an excellent opportunity to network and learn about the latest safety and health advancements, products, and programs serving our industry.

San Antonio, Texas offers great weather, fantastic restaurants, great golf, the Mercado, SeaWorld, Six Flags Amusement Park, and of course the world-famous River Walk. The Hyatt Regency San Antonio directly overlooks the historic Alamo and the River Walk. **A great location and a great venue to meet, learn, and have some fun.**



*View of the San Antonio River Walk*

**PPSA has been a resource to the Forest Products Industry since 1944. Additional information and registration materials for the 2011 conference are available on the PPSA website [www.ppsa.org](http://www.ppsa.org).**



## 2011 Conference Program



### 68<sup>th</sup> Annual Pulp & Paper Safety Association Safety & Health Conference



#### Hyatt Regency

#### San Antonio, Texas

June 19 – 22, 2011

- Discover what is working in safety leadership
  - Learn how OSHA's increased activity is shaping safety in the workplace
- Hear about safety best practices first hand from companies in the Forest Products industry
  - Learn new accident avoidance techniques
- Find out what is currently available and on the cutting edge from safety suppliers
  - Hear about new industry specific training programs
- Network with your peers in our industry to share first hand experiences

**San Antonio, TX:** Offers great weather, fantastic restaurants, great golf, the Mercado, SeaWorld, Six Flags Amusement Park, and of course the River Walk. The world famous River Walk is one of the top visitor destinations in Texas and a cornerstone of San Antonio's robust meetings industry. It's the perfect place for networking, nightlife and entertainment.

**Hyatt Regency San Antonio:** Experience the heart of the River Walk at Hyatt Regency San Antonio. The Hyatt Regency San Antonio River Walk hotel directly overlooks the historic Alamo and the River Walk, connecting two of San Antonio's top destinations through the 16 story atrium lobby. Learn more about the hotel at <http://sanantonioregency.hyatt.com>

Additional information and registration materials for the 2011 conference are available on the PPSA website [http://ppsa.org/conferences\\_and\\_seminars/conference\\_registration.html](http://ppsa.org/conferences_and_seminars/conference_registration.html)

## 2011 Conference Program

### Saturday June 18<sup>th</sup>

4:00 – 6:00 p.m.: Conference Registration

### Sunday June 19<sup>th</sup>

7:00 a.m. – 2:00 p.m.: Golf Outing

2:00 – 7:00 p.m.: Conference Registration

5:00 – 6:30 p.m.: The Chairman's Reception



### Monday June 20<sup>th</sup>

6:45 a.m. – 4:00 p.m.: Conference Registration

7:00 – 8:00 a.m.: Breakfast

## Leadership Required to Improve Safety

8:00 – 8:15 a.m.: Opening Day Welcome and Announcements

8:15 -9:15 a.m.: Keynote Address "Leadership to Influence World Class Safety" - Kevin Igli, Sr. VP EHS - Tyson Foods

9:15 – 9:30 a.m.: Morning Break

9:30 - 10:30 a.m.: Safety Leadership Development for First Line Supervisors & Managers - Marty Barfield, Sr. Director Corp. H&S - Domtar & Larry Walker, Principal - Det Norske Veritas (DNV)

10:30 – 11:15 a.m.: Leadership Development – Debby Feck, Mfg VP Coated Paperboard - International Paper

11:15 a.m. – 12 noon: Mill Management's Role in Leading Safety – Bill Edwards, GM/VP - Domtar Paper Company, Marlboro Paper Mill

12 noon to 1:00 p.m.: Lunch

## Engaging Employees in Safety

1:00 – 2:00 p.m.: Employee Engagement and Organizational Safety Performance - Jim Spigener –BST Co.

2:00 – 3:00 p.m.: Panel Session - Location Examples of How to Engage Employees to be Effective Leaders for Safety - Panel Discussion – Greg Bussel - Weyerhaeuser, Regina Griffin & Seth Harper - Buckeye Technologies, Jarrod Washington – Domtar, Beth Hindman – Temple-Inland

3:00 – 3:15 p.m.: - Afternoon Break

3:15 – 4:15 p.m.: The Zero-Harm Organization: Shifting the Focus from Injuries to Exposures - Jim Spigener – BST Co.

4:15 – 4:45 p.m.: Mill Case Study – Matt Kanneberg - Weyerhaeuser, Port Wentworth, GA

4:45 p.m.: Closing Day Comments

4:45 – 7:30 p.m.: Vendor Suites Open

**Tuesday June 21<sup>st</sup>**

7:00 – 4:00 p.m.: Conference Registration

7:00 – 8:00 a.m.: Breakfast

**Regulatory Issues & Concerns**

8:00 – 8:10 a.m.: Day 2 Announcements

8:10 – 9:15 a.m.: OSHA Address – William Burke, Regional Administrator - Region IV, OSHA

9:15 – 10:00 a.m.: I2P2 - What is this, and what should we do to prepare - Brad Hammock - Jackson Lewis

10:00 – 10:15 a.m.: Morning Break

10:15 – 11:15 a.m.: Regulatory Developments &amp; Review - Eric Hobbs, Michael Best &amp; Friedrich

11:15 – 12 noon: Issues and Developments in OSHA Enforcement of Converting Energy Isolation – Tom Watson - Temple-Inland

12:00 noon to 1:00 p.m.: Lunch &amp; Business Meeting

**The Technical Side to Safety**

1:00 – 2:00 p.m.: Latest update on Combustible Dust - What facilities have done to manage the issue – Steve Luzik - Chilworth Technologies

2:00 – 2:45 p.m.: Experiences at Improving Ergonomics to Reduce MSD Incidents - Company approach with mill experiences - Sue Cooper - Weyerhaeuser

2:45 – 3:00 p.m.: Afternoon Break

3:00 – 3:45 p.m.: Loading Dock Safety - A Company's Approach – Larry Warren - Domtar

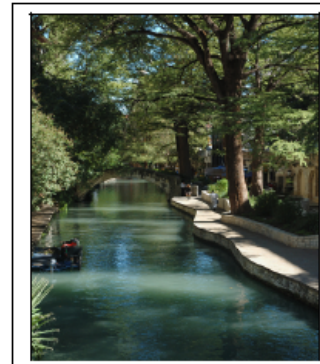
3:45 – 4:45 p.m.: Mill Case Study – Doug Howard, Sr. Engineering Consultant – Boise Inc.

4:45 – 7:30 p.m.: Vendor Suites Open

**Wednesday June 22<sup>nd</sup>**

7:00 – 12:00 noon: Conference Registration

7:00 – 8:00 a.m.: Breakfast

**The Safety Culture – What does it look like**

8:00 – 8:10 a.m.: Day 3 Announcements

8:10 – 9:15 a.m.: Attributes to a Desired Safety Culture - Rodney Grieve - Branta Worldwide

9:15 – 10:00 a.m.: How to Achieve the Desired Safety Culture – Phil McIntyre - Milliken

10:00 – 10:15 a.m.: Morning Break

10:15 – 11:15 a.m.: Mill Experiences in Working toward a Sustained Culture of Safety – Aleasa Tasker, VP Mill Manager - Weyerhaeuser Grand Prairie Mill, Alberta, Canada

11:15 – 11:45 a.m.: PPSA's Evolving Journey to Increase Industry Safety – Chris Redfearn, Weyerhaeuser

11:45 a.m.: Box Lunch

5:00 – 6:00 p.m.: Cash Bar

6:00 – 9:00 p.m.: Awards Banquet

## The Legal Corner

By: Charlie Morgan



### Recent OSHA Developments

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### OSHA Issues Enforcement Guidance for Personal Protective Equipment

On February 10, 2011, the Occupational Safety and Health Administration issued its enforcement guidance regarding personal protective equipment (PPE). The directive provides guidance to OSHA's compliance officers when evaluating whether to issue citations against an employer regarding PPE requirements. The directive is merely a guideline and does not bind OSHA to any particular policy, but does provide a road map on the PPE issues likely to be raised by OSHA in an inspection. See CPL 02-01050 (February 10, 2011) ([http://www.osha.gov/OshDoc/Directive\\_pdf/CPL\\_02-01-050.pdf](http://www.osha.gov/OshDoc/Directive_pdf/CPL_02-01-050.pdf))

The directive provides that compliance officers shall determine whether an employer is in compliance with the PPE standards, and provides a summary of applicable general industry standards for the compliance officers.

Notable provisions in the directive include the following:

- "The CSHO shall determine whether the employers have certified in writing that a hazard assessment has been conducted. A violation of 29 CFR 1910.132(d)(2) should be issued if no written certification has been performed."
- "The CSHO shall determine whether the employer has a written certification that each affected employee has received and understands the required training. Cite 29 CFR 1910.132(f)(4) if an employer cannot produce such certification."
- "OSHA's existing clothing requirement in 29 CFR 1910.269(l)(6)(iii) does not require employers to protect employees from electric arcs through the use of flame-resistant clothing. Rather, it requires that an employee's clothing does not increase the extent of an injury when exposed to flames or electric arcs."

The directive devotes much detail to the requirement under the standards that employers must provide at no cost to employees the PPE that is used to comply with the applicable PPE standards. As the directive makes clear, however, not all PPE is subject to this requirement, and the directive provides the below examples of PPE covered by this employer-pay requirement as well as PPE exempt from the employer-pay requirement.





Examples of PPE for Which Employer Payment is Required	Examples of PPE Exempt from Employer Payment Requirements
Metatarsal foot protection.	Non-specialty safety-toe protective footwear (such as, steel-toe shoes/boots).
Special boots for longshoremen working logs.	Non-specialty prescription safety eyewear.
Rubber boots with steel toes.	Sunglasses/sunscreen.
Shoe covers – toe caps and metatarsal guards.	Sturdy work shoes.
Non-prescription eye protection.	Non-specialty slip-resistant, non-safety-toe footwear.
Prescription eyewear inserts/lenses for full-face piece respirators.	Lineman's boots.
Prescription eyewear inserts/lenses for welding and diving helmets.	Ordinary cold weather gear (coats, parkas, cold weather gloves, and winter boots).
Goggles.	Logging boots required under 29 CFR 1910.266(d)(1)(v).
Face shields.	Ordinary rain gear.
Laser safety goggles.	Back belts.
Firefighting PPE (helmet, gloves, boots, proximity suits, full gear).	Long-sleeve shirts.
Hard hats / Bump Caps.	Long pants.
Hearing protection.	Dust masks and respirators used under the voluntary use provisions in 29 CFR 1910.134.
Welding PPE.	Items worn to keep employees clean for purposes unrelated to safety or health (denim coveralls, aprons).
Items used in medical/laboratory settings to protect from exposure to infectious agents (aprons, lab coats, goggles, disposable gloves, shoe covers, etc.).	Items worn for product or consumer safety (not employee safety and health). For example: hairnets worn solely to protect food products from contamination, that is not used to comply with machine guarding requirements; and plastic or rubber gloves worn solely to prevent food contamination during meal preparation (This would <i>not</i> include cut-proof gloves worn to prevent lacerations).



Examples of PPE for Which Employer Payment is Required	Examples of PPE Exempt from Employer Payment Requirements
Non-specialty gloves: Payment is required if they are PPE, such as for protection from dermatitis, severe cuts/abrasions. Payment is not required if they are only for keeping clean or for cold weather (with no safety or health considerations).	Items worn for patient safety and health; not employee safety and health.
Rubber sleeves.	Uniforms, caps or other clothing worn solely to identify a person as an employee.
Aluminized gloves.	Travel time and related expenses for employees to shop for PPE.
Chemical-resistant gloves/aprons/clothing.	
Barrier creams (unless used solely for weather-related protection).	
Rubber insulating gloves.	
Mesh cut-proof gloves, mesh or leather aprons.	
Self Contained Breathing Apparatus, atmosphere-supplying respirators (escape only).	
Respirators.	
Personal fall protection.	
Ladder safety device belts.	
Climbing ensembles used by linemen (for example, belts and climbing hooks).	
Window cleaners' safety straps.	
Personal Flotation Devices (life jackets).	
Encapsulating chemically protective suits.	
Reflective work vests.	

Other notable provisions regarding employer payment include the following:

- “An employer may allow PPE to be used off of the job site. However, they still must provide the required PPE at no cost to employees, even if use of the PPE is allowed off-site.”
- “The rule does not prohibit the employer from requiring the employee to return the PPE (provided at no cost) upon termination of employment. If an employee quits his/her job and does not return the employer’s PPE, then the employer may require the employee to pay for it, or take reasonable steps to retrieve the PPE.”

- “Payment for Replacement PPE.
  - Employers are required to replace PPE following the criteria in OSHA’s existing standards governing when PPE is required to be replaced. For example: ‘Hearing protectors shall be replaced as necessary,’ under 29 CFR 1910.95(i)(1) means that employers must replace worn out hearing protectors.
  - Employers must provide replacement PPE at no cost to the employee except when the employee has lost or intentionally damaged the PPE.
  - Employers do not have to bear the cost of replacing PPE that the employee has lost, even if it is a single instance. The PPE may be considered ‘lost’ if the employee comes to work without the issued PPE.
  - The rule does not prohibit employers from sending employees home to retrieve the PPE or from charging an employee for replacement PPE when the employee fails to bring the PPE back to the workplace.”

Finally, the directive assembles a summary of relevant interpretative letters regarding PPE requirements. The directive serves as a comprehensive summary of the regulatory requirements surrounding the use of PPE, and could serve as a useful reference in a self-audit process.

### Common Citations in Significant Cases in the Pulp and Paper Industry

As is well-known, OSHA publicizes its major enforcement actions, and typically issues a news release when proposed penalties exceed \$100,000. The news releases, of course, describe only the allegations against the employer and not the final resolution of the citations – either through settlement with the agency or adjudication before the Occupational Safety and Health Review Commission. Nevertheless, the news releases from OSHA can be instructive as to OSHA’s enforcement activities.

A review of the significant enforcement actions involving the pulp and paper industry over the last three years reveal a number of common “top-line” issues which were either the initiating event for the investigation or resulted in the most citations. A summary of those main “top line” issues in the significant enforcement actions is as follows:

Number of Significant Cases	Description of Main Issue Cited	Standard
6	Machine guarding/nip point	29 C.F.R. 1910.212
3	Open sided work platform/unguarded floor opening	29 C.F.R. 1910.23
1	Unblanked steam line	29 C.F.R. 1910.261
1	Crane	29 C.F.R. 1910.179

In a number of these significant enforcement actions, OSHA also alleged a failure to abate, which drove up proposed penalties. Finally, the above-listed standards are also some of the more frequently cited by OSHA in the pulp and paper industry.

### Recent Review Commission Decisions

*Recordkeeping Citations Held Not Time-Barred by OSHA’s Six Month Statute of Limitations.*

In a recent decision, the Occupational Safety and Health Review Commission held that OSHA 300 log entries made prior to six months of the issuance of citations could be cited by OSHA and were not

barred by OSHA's six month statute of limitations. *AKM LLC d/b/a Volks Constructors*, 2011 WL 896347 (OSHRC March 11, 2011). In *Volks*, OSHA issued citations alleging that the employer failed to record injuries and failed to post logs for the time frame from January, 2002 through April, 2006. OSHA's inspection began on May 10, 2006, and the citations were issued less than six months later, on November 8, 2006.

The employer argued that the citations were untimely because the citation was issued more than six months after the duty to record them arose. The employer cited as support a recent U.S. Supreme Court case that limited the "continuing violation" theory in the employment discrimination context, holding that the statute of limitations begins running upon a "discrete, volatile act."

In rejecting this argument, the Review Commission noted its previous decisions that hold that a recordkeeping violation "violates the Act until it is corrected, or until the 5-year retention requirement [of the regulation] expires." *Volks*, citing *Johnson Controls, Inc.*, 15 BNA OSHC 2132 (OSHRC 1993). Similarly, the *Volks* Review Commission ruled that a violation of the recordkeeping standard continues beyond the six-month deadline for issuing citations because of the continuing obligation by employers to retain the records for five years. By contrast, the Review Commission ruled that a citation alleging a failure to post the annual summary from February 1 until April 30 of the applicable year was time-barred, holding that "[t]he regulation imposed a duty to post the summary for only a specified time period, and the Secretary failed to issue a citation within six months of the last day of that specified time period."

#### *ALJ Rejects Employer's Argument of Employee Misconduct Regarding a Lockout/Tagout Citation.*

In *Crown Cork & Seal USA, Inc.*, 2011 WL 1290676 (OSHRC ALJ February 22, 2011), the administrative law judge affirmed a lockout/tagout citation despite the employer's argument that the employee had been exposed only because she worked outside her assigned duties and committed an act of unpreventable employee misconduct.

In *Crown Cork & Seal*, an employee had been instructed to clean only the visible parts of a mechanical power press while the press was in operation. The employee began cleaning oil from a guard when she was injured. The employer was subsequently cited for a violation of the lockout/tagout standard, with OSHA alleging that "employees on the cleaning crew always cleaned the frame and guards on the conveyor while the press was in operation and exposed themselves to the in-running nip point hazards."

In evaluating the employer's arguments, the administrative law judge noted that to establish the defense of unpreventable employee misconduct, it is the employer's burden to prove "(1) that it has established work rules designed to prevent the violation, (2) that it has adequately communicated these rules to its employees, (3) that it has taken steps to discover violations, and (4) that it has effectively enforced the rules when violations are discovered." *Crown Cork & Seal*, citing *Precast Services, Inc.*, 17 BNA OSHC 1454 (OSHRC 1995). In rejecting the employer's defense, the administrative law judge held that, although there was evidence to demonstrate that the cleaning crew was instructed to clean the front of the machine, there was no evidence to suggest that they were explicitly prohibited from cleaning oil and grease from the rear of the machine where the injury apparently occurred, and there was evidence that the cleaning crew had, in the past, cleaned the rear of the machine.

## 2010 PPSA Safety Awards

### Award of Excellence

Sponsored By PPSA

Paper, Pulp, Tissue, Recycle Mills, Recycle Collection Centers, and Boxboard Mills  
Smurfit-Stone Recycling, Oakland, CA

#### Converting

Temple-Inland, Garden City, KS (Box Plant with a Corrugator)

Woodlands, Sawmills, Wood Products, Plywood and Particle Board  
Temple-Inland, S.W. Lumber, DeQuincy, LA (Sawmill)

### Best Record

Sponsored by Pulp and Paper Magazine

Box Plant With Corrugators: Temple-Inland, Bell (Los Angeles), CA  
Box Plant Without Corrugators: Temple-Inland, Madison, OH  
Paper Mill #1: Abitibi-Bowater, Catawba, SC  
Paper Mill #2: Smurfit-Stone, Hodge, LA  
Paper Mill #3: Weyerhaeuser, Norpac-Longview, WA  
Pulp Mill: Weyerhaeuser, Grande Prairie, AB  
Recycle Collection: Smurfit-Stone Recycling, Jacksonville – South, FL  
100% Recycle Mill: Sonoco, Hutchinson, KS  
Sawmills: Rayonier, Swainsboro, GA  
Building Products: Temple-Inland, Cumberland City, TN  
Sheeting & Sheet Feeder: Temple-Inland, Midwest Sheets, Tipton, IN  
Specialty: Temple-Inland, Graphics Resource Center, Indianapolis, IN

### Most Improved

Sponsored by Weyerhaeuser Company

Box Plant Without Corrugators: Temple-Inland, Scotia, NY  
Box Plant With Corrugators: Green Bay Packaging, Fort Worth, TX  
Paper Mill #2: Georgia-Pacific, Brewton, AL and  
Domtar, Windsor, QB  
Paper Mill #3: Temple-Inland, Rome GA and  
Domtar, Port Huron, MI  
Pulp Mill: Buckeye Technologies, Memphis, TN  
Recycle Collection: Smurfit-Stone Recycling, Bakersfield, CA  
100% Recycle Mill: Temple-Inland, Ontario, CA  
Sawmills: Temple-Inland, Diboll Lumber, Diboll, TX  
Building Products: Temple-Inland, Diboll Fingerjointing, Diboll, TX  
Sheeting & Sheet Feeder: Boise White Paper, Jackson, AL and  
Domtar, Washington Courthouse, OH  
Specialty: Temple-Inland, Kennett Square, Toughkenamon, PA  
Woodlands: Green Bay Packaging, Fiber Resources, Morrilton, AR



**Safety*****“Tool-Box” Safety Chat*****Handy, but Hazardous**

Yes, hurrying down to Haiti with some humanitarian assistance was a good thing.

Yes, bringing in some heavy equipment for the work was also good.

Yes, getting the work done quickly and expeditiously was to be desired.

All of that being said, a front-end loader isn't a man-lift or a cherry-picker, no matter where you are.

This is a great example of having the right intentions, but not stopping and thinking about the safe way to get the job done. Too often we react to an upset condition and place ourselves or others at risk of injury because, at the time, it seemed the right thing to do.

The best thing you can do when an upset condition occurs is maintain your composure, stay calm, and “take-two” to assess the conditions, risks and potential solutions to abate the upset.

Maintain control of the situation and ask yourself: “Am I properly equipped and trained to correct the issue or do I need to get help from my co-workers or supervisor?”

## **Program Development Resources -Safety**

Safety and Health programs seek to reduce the number and effects of accidents and illnesses at work. Look below for links to model programs and other resources you can use to create your Workplace Safety and Loss Prevention Incentive Program. They can help you build a program that will meet your needs.

United States Department of Labor Occupational Safety & Health Administration resources:

<http://osha.gov/SLTC/safetyhealth/recognition.html>

<http://osha.gov/SLTC/safetyhealth/evaluation.html>

Washington State Department of Labor and Industry model program:

<http://www.lni.wa.gov/Safety/Basics/Programs/Accident/Samples/FinalAPPMoelForma t.rtf>

Oregon Department of Consumer & Business Services model program and resources:

<http://www.cbs.state.or.us/osha/pdf/pubs/cddocs/4755doc.html>

Pacific Northwest Extension model program:

[http://nasdonline.org/static\\_content/documents/1680/d001571.pdf](http://nasdonline.org/static_content/documents/1680/d001571.pdf)

Associated General Contractors – Oregon program resources:

[http://www.agcoregon.org/public/programs/0\\_05\\_how\\_success\\_safetyandhealth\\_program.pdf](http://www.agcoregon.org/public/programs/0_05_how_success_safetyandhealth_program.pdf)

Sample program – New Mexico State University:

[http://www.nmsu.edu/safety/policies/policy\\_university\\_eh&s.htm](http://www.nmsu.edu/safety/policies/policy_university_eh&s.htm)

Sample program – City of Hamilton, CA:

<http://www.myhamilton.ca/myhamilton/CityandGovernment/CityServices/Careers/EmployeeOrientation/PoliciesProcedures/OccupationalHealthSafetyPoliciesProcedures.htm>

## Health and Safety Communiqué

### “Summer-time” Safety

[Being Brilliant at the Basics]

Historically, during the “summertime period” (May – August), some companies incur an increase in injuries and illnesses. Many sites do an excellent job of pre-planning to eliminate risk factors that contribute to the injury increase. However, some sites have opportunities to develop pre-plans to eliminate injury potential and to communicate to ensure all employees are engaged. This communication is to remind you to have plans to reduce or even eliminate these increased incidents at your facility. Don’t wait, start planning now.

Many times an increased awareness, communication, and reminder or in some cases, specific action steps will eliminate & prevent summertime injuries and illnesses.

The following are some areas to target your communication and training throughout the coming months:

1. **Heat Stress Prevention** – High temperatures and humidity combined with heavy workloads and personal protective equipment increase the likelihood of heat related illness. When a team member’s ability to respond to heat stress is exceeded, exposure can lead to reduced ability to perform quality work, can increase accidents on the job and can cause heat related illness. To prevent this from occurring, ensure all employees are trained and your facility’s Heat Stress program elements are covered in your next safety meeting. Remember to train on the basics of rest breaks and keeping hydrated. There are some PPE approaches that may help like cool vests and cooling bandanas. A word of caution....be aware of loose dangling PPE such as cooling bandanas around moving equipment. They must be prohibited where they may pose additional hazards.
2. **High Vacation Load** – Typically in the summer month’s vacations increase significantly. In some converting businesses, seasonal marketing and production demands can exacerbate this effect, increasing scheduled production times. Filling in for vacations and vacation relief’s can be challenging at best. Team members can be scheduled to work longer hours leading to fatigue which can lead team members to lose concentration and make “at risk decisions.” Less experienced team members may be placed in different jobs. Temporary help may be needed to fill gaps. Team members may not be focused on work tasks as their minds are off of work anticipating vacation activities. It’s extremely important to implement practices such as increased focus on employee training and scheduling to avoid as much overtime as possible. Pre-job safety work plans, increased employee observations and assigning mentors to less experienced team members working on new or non-routine tasks will assist in ensuring a safe place to work.
3. **Summer/Temporary Employees** – During summer months, temporary employees and/or college students may be hired to provide vacation relief and to assist in completing project work. These individuals could be assigned to high risk tasks or perform non-routine tasks which are typically done by more experienced team members. Also they may not be able to recognize hazards in the workplace and can be distracted easily. The following list provides examples that help reduce the potential for injury:
  - a. Assignment of mentors
  - b. Assign summer help and temporary employees low risk jobs
  - c. Adopt and communicate specific plans for summer help to ensure accountability and responsibility
  - d. Conduct frequent and consistent performance reviews
  - e. Designate frequent and specific training
  - f. Allow for a thorough orientation

- g. Require a readily identifiable article of clothing (orange shirt, vest, hat or hard hat) to identify individuals you want to target for close observation to ensure their safety.
  - h. New hire team members should be given time to acclimate to hot environments
  - i. Increase behavioral observations in the facility
4. **Insect Bites** – Ensure your local exterminator sprays for insects regularly in locations where team members could possibly work. Be on the lookout for bees, hornets, wasps, yellow jackets, mud daubers, spiders and the like. Every year employees are impacted and suffer pain from the direct result of some sort of insect. When possible, wear light, cotton long sleeve shirts and long pants. Ensure you have a supply of over the counter Benadryl and like remedies to help relieve symptoms associated with insect bites. At the end of the day shower, then inspect your entire body for ticks and other insects.
5. **Poisonous Plants** – Ensure areas that support the growth of vines such as poison ivy, poison oak and poison sumac are identified and controlled by your local exterminator. Look for poisonous plants along fences, tree trunks, gutter systems, along exterior walls of buildings etc. If you know you have been exposed to a poisonous plant dispose of gloves or wash thoroughly. Over the counter Benadryl will aid in relieving itchiness and mild discomfort associated with the contraction of most poisonous plants. Wash the area thoroughly with cold water or with a post exposure ivy wash such as Tecnu or Zanol. [Always consult with your site's occupation health contact prior regarding treatment.] At the end of the day shower and re-apply. Calamine lotion can be applied to red or itchy areas of the skin to assist in relieving itchiness and assist in drying the affected area.
6. **Snake Bites** - Ensure snakes are controlled by your local exterminator. They have repellants that can be applied to ward off snakes. Areas that contain thick or tall vegetation, places not frequently occupied by people, pits such as scale pits etc., need to be evaluated. Team members required to work or walk through these type of conditions should use "leggings" to help protect them from exposure to snakes, ticks and other problematic insects.
7. **Sunburn** - Ensure team members who work outdoors have all the PPE they need to work safe. Although associated with the beach or boating, don't forget sun block where appropriate on the job and safety sunglasses to prevent sunburn. For some outdoor tasks, it may be appropriate to erect a tarp or temporary structure that provides adequate shade in which to work or take breaks.
8. **Heat Rash** – Heat rash is another form of warning that your body is overheating. Seek shade when possible. Keep as cool as possible. Stay properly hydrated. At the end of the day a cool compress on the affected area will help reduce symptoms.
9. **Inspect Fans/Air Movers and other equivalent type of Cooling Devices** – With increased temperatures, there is often a need to provide means to circulate the air and help reduce air temperature. Associated with this comes additional hazards when using fans, air movers and electrical equipment. Every year there is potential for injuries as a result of poor fan maintenance, usage and practices. Some points to consider before using portable fans, air movers and associated equipment in your facility are:
- a. Fan guards must fully enclose the blades and not have any openings greater than ½",
  - b. Electrical cords on fans or other cooling devices must be free of splices and equipped with a grounding prong
  - c. Electrical cords running to fans, air movers and coolers must be protected or placed overhead to prevent tripping hazards
  - d. Employees must turn off and unplug portable fans prior to repositioning and fans should be moved by the base/pedestal rather than the blade housing.
  - e. Ensure all portable electrical equipment used to cool the ambient temperature is inspected at required intervals
  - f. When servicing air conditioning equipment, ensure it is done in accordance with applicable environmental requirements. Certain types of refrigerants (CFC's) are subject to a variety of environmental obligations.

**If each of us takes the extra time and effort necessary to plan and prepare for the hot summer days ahead we can reduce and eliminate the potential injury experience as described.**



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## What is Your Accepted Level of Risk?

By John Sunderland

The word “risk” means a lot of different things to different people. When dealing with insurance issues it can mean: a possibility of loss or injury; a dangerous element or factor; the degree of probability of loss; or a person or thing that is a specified hazard to an insurer. While some of those possible definitions come close, as individuals, we think of risk as being exposed to hazard or danger. Our recognition of what is a hazard or danger varies as much and as often as our willingness to take a risk. And all of these possible considerations have to take place in an instance when you come upon something unexpectedly.

To measure risk we can use a variety of tools that tend to look at two things:

- 1) What are the chances that something bad will happen? and
- 2) How bad will it be if it does happen?

We know that a number of factors can increase the odds that something bad will happen, such as equipment condition, congestion of the work area, personal concentration, the weather, surrounding noise, and lack of familiarity with the task or location. We use tools to improve the factors like audits and inspections and try to make the conditions the safest they can be.

The second thing that we usually recognize is how much harm can come from an activity. For severe hazards, like working on heights, working with explosives, or fast moving sharp equipment, we pretty much take the approach of “staying back”. But after a while, those people who work with these severe hazards on a regular basis get accustomed to the danger and shorten the comfort distance to the hazard. The first time you are in a NASCAR race, you will probably go slower than when you are a veteran driver.

So, what can we do to determine our personal accepted risk level?

The first is to understand the requirements of the working area. What are the rules that have been established for the area? Get a proper level of training for the task. Use the “What If?” approach to identifying hazards, such as “What if this inventory pile was to fall?” Get co-workers to provide input as to what they perceive are hazards and how is your performance looks to them (Behavior Observation). Recognize that your own personal attention is one of the best tools for keeping you safe. Keep focused on the task and aware of your surroundings. Safety professionals tend to act as if every potential hazard should be protected. At times, this may seem like overdoing, but we learned from some great people. Ask a coworker that has competed twenty five years without an injury. They will probably tell you that they feel that they, personally, were the biggest part of being safe.

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## Health and Safety Communiqué

### Conveyor Photo Eye Inadvertently Activated by Reflective Clothing (Hi-Vis Vest)

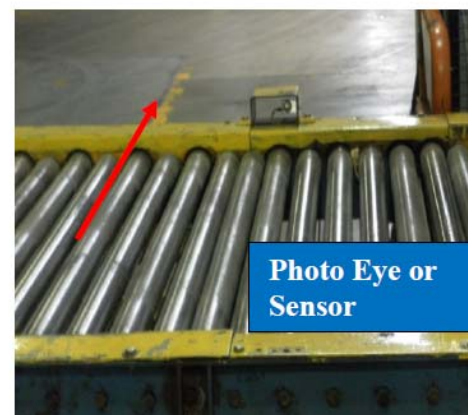
This communiqué is to alert sites of a potential hazard associated with photo eyes used to activate or stop moving equipment. One mill's recent experience showed that an operator's reflective clothing (Hi-Vis Vest) can inadvertently activate photo eye sensors when in close proximity to those sensors (e.g., within 5 feet). Fortunately, no one was hurt during this incident, but the potential exists for serious "line-of-fire" injuries if equipment should unexpectedly activate or shutdown. Recommended Facility Actions are provided to prevent future occurrences at facilities that use reflective clothing (or other reflective equipment or gear) and where electronic photo eyes are used on material handling equipment.

#### Background



High visibility safety clothing such as "Hi-Vis" vests and other garments play an important role in one's overall safety program. This critical Personal Protective Equipment (PPE) is used to warn motorized vehicle operators (e.g., lift truck operators, chemical and wood delivery truck drivers) of the presence of pedestrians who might not otherwise be readily seen. Both reflective (ANSI/ISEA Class II and Class III) and non-reflective (ANSI/ISEA Class I) clothing are used depending upon the application. Reflective garments are typically used outdoors (especially during the nighttime hours), and non-reflective gear is acceptable indoors.

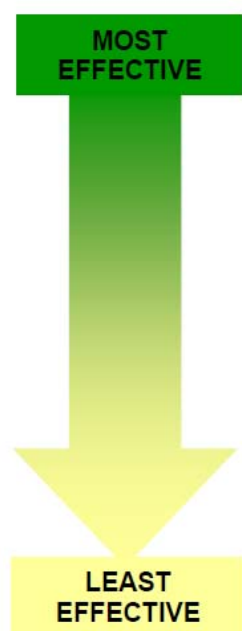
Recently a mill discovered that some photo eyes or sensors can be activated simply by someone walking by the equipment wearing reflective (Class II or Class III) garments. In this particular case, it was a Class II vest. Fortunately, no one was hurt during this incident but equipment such as conveyor systems with photo eyes/sensors can start up unexpectedly, putting people into the "line-of-fire". This could lead to serious injuries. Photo eyes are designed to detect the presence of an object in close proximity of the sensor. The reflective material on a Class II or Class III vest sends a false signal, activating the equipment prematurely at distances as close as five feet away.





**Facility Actions:**

- Identify photo eyes/sensors that reflective materials could activate. They could be present on equipment such as conveyor systems, strappers, transfer lifts (low raters), or other material handling systems.
- Where the potential for unwanted activation exists, employ at least one or any combination of the following control measures to minimize potential exposure:



- Adjust the photo eye or sensor to prevent inadvertent activation
- Install a shroud around the sensor to prevent inadvertent activation. Contact the device manufacturer for effective guarding options.
- Restrict Hi-Vis clothing use:
  - Class II & III – Outdoors only
  - Class I – Indoors only
- Install signs close to each photo eye or sensor to warn of the potential hazard.



**WARNING**  
**No reflective  
material or Hi-Vis  
clothing within 5 ft  
of photo eye**

- Continue the use of High visibility clothing where appropriate. It is a critical component of our safety program.
- Communicate the contents of this communiqué to all affected personnel.
- Audit for compliance and effectiveness.



## Finally – An Effective Plug Valve Lockout!



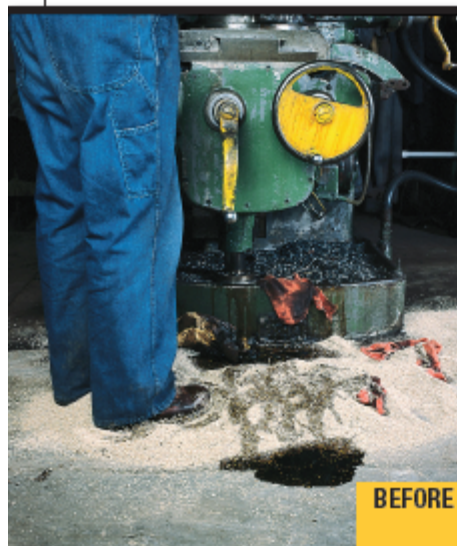
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***Fatal Facts*** (from OSHA Region IV e-news – March 2011)**Brief Description of Accident**

An employee removed a flat tire from a single piece rim that was on a log truck trailer. The employee retrieved a Michelin Pilot XZA-1, size 275/80 R24.5 tubeless tire to install. The employee first deflated the old tire and removed the single piece rim. Soap and water were applied to the new tire's edge so that it would be easier for seating the beads. The new tire was installed on one side of the wheel using a crowbar. The wheel was then turned to the opposite side to complete the installation of the tire. One hundred (100) pounds of air pressure was injected into the space between the wheel rim and the tire.

The employee placed the tire against the trailer after inflating the tire. During the installation of the cap on the air stem, the tire blew away from the rim. Another employee stated that they heard a popping noise and then saw the deceased laying on the floor, six feet away with the tire rim on top of the employee.

**Inspection Results**

The OSHA investigation of the tire rim revealed several worn areas on the lip of the rim which could have limited the sealing ability of the tire to the rim. Citations were issued for: lack of a restraining device or barrier when inflating tires on a single piece rim which is not bolted; training; and the lack of safe operating procedures. The employer was also cited for not reporting the fatality.

**Accident Prevention Recommendations:**

1. Insure the usage of a restraining device when inflating tires that are not bolted.
2. Develop and implement operating procedures.
3. Train employees and take appropriate precautions for the hazards involved.

**Sources of Help:**

- General Industry Safety and Health Standards (29 CFR 1910) which contains all OSHA job safety and health rules and regulations.
- OSHA-funded free onsite consultation services, <https://www.osha.gov/dcsp/smallbusiness/consult.html>.
- Contact your local OSHA area or regional office for further assistance, <http://www.osha.gov/html/RAmap.html>.

NOTE: The case that is described here was selected as being representative of fatalities that are caused by improper work practices. No special emphasis or priority is implied, nor is the case necessarily a recent occurrence. The legal aspects of the incident have been resolved, and the case is now closed.



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## Health and Safety Communiqué

### **Sodium Chlorate ( $\text{NaClO}_3$ )** **[Feed Chemical for Chlorine Dioxide ( $\text{ClO}_2$ ) Generation]** **Fire and Explosion Hazards**

This Communiqué provides information and instruction to mills that unload, store and otherwise use sodium chlorate ( $\text{NaClO}_3$ ) – a *powerful oxidizer and feed chemical for the production of chlorine dioxide ( $\text{ClO}_2$ )* - to review this chemical's unique fire and explosion hazards with affected personnel and to implement measures to prevent the inadvertent contact of this chemical with organic and combustible materials (including clothing and PPE) and acids.

#### Background

Two separate recordable injuries occurred involving severe burns to the hands when sodium chlorate ( $\text{NaClO}_3$ ) was suspected of inadvertently contaminating leather work gloves which later burst (ignited) into flames. In 2009, another forest products company's employee was fatally burned (over 90% of his body) while driving motorized equipment over what was believed to be sodium chlorate-contaminated wood chips at a chemical unloading area.<sup>[1]</sup> Sodium chlorate – a *powerful oxidizer* – will support/enhance/accelerate the burning of combustible materials and presents unique fire and explosion hazards.



#### **Sodium Chlorate – Fire and Explosion Hazards**

Sodium Chlorate ( $\text{NaClO}_3$ ) is delivered to mills as a crystalline solid or saturated solution and is the feed chemical for the production of chlorine dioxide ( $\text{ClO}_2$ ) used to bleach pulp. Sodium chlorate is a powerful NFPA Class 3 (DOT Class 5.1) [Oxidizer](#) that should not be permitted inadvertent contact with organic chemicals, combustible materials (including clothing and PPE) and acids.



Sodium chlorate reacts with organic contaminants to form shock-sensitive mixtures and acids and chlorate mixtures may generate toxic or explosives gases, namely chlorine and chlorine dioxide. Although sodium chlorate is not itself combustible, it enhances the combustion of other substances, such as wood (wood chips), sawdust, leather (boots or gloves), cotton (shirts, pants or boot laces), paper, and organic (hydrocarbon) greases.

This hazard normally occurs after sodium chlorate solution has dried out, leaving the combustible materials impregnated with sodium chlorate. Such contaminated materials are likely to be easily ignited by heat, sparks, friction, static electricity, or other ignition sources.

There have been documented cases of leather work boots spontaneously combusting while being worn days after exposure to sodium chlorate.

When unloading sodium chlorate (crystals or solution), or cleaning up spills or leaks of this chemical, wear appropriate personal protective equipment (PPE) and thoroughly rinse/wash this PPE to remove any residual sodium chlorate prior to leaving the area (e.g., using a safety



shower located in the immediate vicinity). Refer to the supplier's or a manufacturer's MSDS for appropriate PPE, or follow these general PPE recommendations:<sup>[2]</sup>

- Impervious/chemical resistant coveralls or rain suit (disposable or washable) (e.g., vinyl, rubber, neoprene, or PVC)
- Chemical resistant gloves (e.g., rubber, neoprene or PVC)
- Steel-toed rubber boots; chemical goggles, or face shield with safety glasses; hard hat.

***Leather boots, gloves, belts or watch bands should not be worn around NaClO<sub>3</sub>.***

When working around sodium chlorate areas with a low likelihood of exposure, wear polyester or cotton clothing (flame retardant clothing recommended) but change clothing regularly and if suspected to be contaminated keep clothing from drying out (keep wet) and wash promptly. It is preferable to discard contaminated clothing but contaminated clothing must first be decontaminated prior to disposal. Clean up any sodium chlorate spills with copious amounts of water.

### **Facility Actions:**

1. Implement procedures (or post instructions/signs) for unloading and other tasks involving sodium chlorate to ensure that:
  - a. Appropriate PPE (see above) is worn and that this gear/equipment is thoroughly washed/rinsed down after the unloading or handling task.
  - b. Adequate steps/measures are taken to minimize the inadvertent contact of sodium chlorate with organics or other combustible materials (in particular clothing and PPE) and that any contaminated items are washed and discarded; chlorate filters should also be thoroughly rinsed before disposal.
  - c. Acids are kept separate from sodium chlorate unloading and handling areas.
  - d. Special precautions are taken for Hot Work performed around sodium chlorate storage tanks/piping or handling areas (e.g., wash down area before Hot Work).
2. Inform/instruct operating personnel and others (e.g., maintenance & contractor employees) about the potential fire and explosion hazards associated with sodium chlorate and what to do in the event clothing or other PPE should inadvertently come in contact with sodium chlorate (even if suspected) (e.g., thoroughly wash and discard).

---

1. <http://www.kfdm.com/news/victim-32647-dies-fire.htm>

2. Sodium chlorate (NaClO<sub>3</sub>) Safe Handling and Storage – TIP 0606-31 – TAPPI (2008).

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## Eye on Ergonomics

Who's Monitoring the Monitors?

### Test Your Monitor IQ

**Q: What exactly is the ideal monitor height?**

**A:** Monitors should be set so that the top of the screen is roughly at eye level when you are sitting up straight.

**Why?** - Relaxed posture for the human eye is 15° below the horizon and we all slouch now and then, so before you know it your relaxed eye is focused in the middle to upper 1/3 of the screen....and that's where most of our work is.

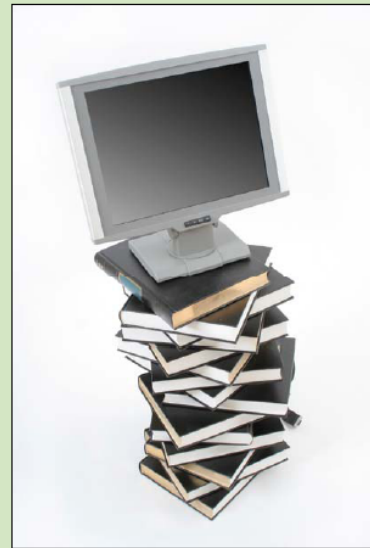
**How?** - Raid your photocopy room and prop your monitor up on packages of paper if it's too low, or pull out those phone books from underneath if it's too high.

**Q: How far away should your monitor be positioned from your eyes?**

**A:** It depends on your vision, if you catch yourself leaning forward or squinting to view the screen it's too far away and you need to pull it closer!

**Why?** - Your head weighs as much as a bowling ball! When you lean it forward to squint at a monitor your upper back and shoulder muscles pay the price!

**How?** - Pull your monitor closer! ... with the advent of flat screens everyone seems to push their monitor farther away to regain desk space, but that has spawned a generation of 'leaners' with sore necks and upper backs! If you can't part with the debris on the front of your desk to bring your monitor closer to you, then try keeping your chair tucked in close to the front of the desk so you bring yourself closer to the monitor.





## Test Your Monitor IQ

**Q: Won't a close monitor bother my eyes or project 'radiation'?**

**A:** Those worries about monitor radiation from CRTs were resolved years ago, and flat screen technology is totally different and much easier on the eyes. If you find the monitor is too bright or it bothers your eyes to have it close try adjusting the brightness and contrast. (But don't get too close – minimum recommended distance is 16").

**How?** – Those little buttons on the bottom front of your monitor case adjust the screen brightness and contrast. It might take a bit of trial and error, but once your monitor is set for your vision your eyes will thank you!

**Q: What if I wear bifocals or progressive lenses?**

**A:** Bifocal wearers typically look out of the bottom of the lens to view the monitor so to avoid tipping your head up to view the screen, set the top of the monitor 3" -4" below eye level.

**How?** – Lower your monitor as much as possible. If you're still too high try the following tips: Sneak your chair up a bit to get your eye level above the top of the monitor OR position the work on your screen a few inches lower. You'll lose a bit of screen area but your neck and shoulders will thank you!

**TIPS:**

- Your monitor should be lined up directly in front of you so that you don't have to twist your neck to view it.
- You should take regular **20-20-20 vision breaks** to rest your eyes if you spend long hours in front of the computer – every 20 minutes take a 20 second break and refocus your eyes on something at least 20 ft away. (It works just as well to close your eyes for 20 seconds, but then folks might think you're sleeping on the job!)

For additional tips and information on *Industrial Toolbox Talks* click on the following link:

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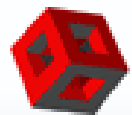
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**About our Organization****Membership Information**

Membership in the Association is by operating facility, such as a paper mill, box plant, sawmill, woodlands, etc. Approximately 380 operating facilities are currently members. Annual Membership is based on employee numbers. 1-50 employees is \$100, 51-100 employees is \$150, 101-200 employees is \$200, 201-500 is \$250 and 501 and up is \$300. Vendors are \$275

Membership in the Association has many advantages:

- Participation in the Annual Health and Safety Conference and service as a member of the Board of Directors provides an opportunity for personal and professional growth.
- The Pulp and Paper Safety Association is the ONLY national organization exclusively concerned with accident prevention in the forest product industry.
- The annual Conference provides great face-to-face networking opportunities.
- The Quarterly Report provides a way of bench-marking your own performance with others in similar operations.
- The Awards program provides a prestigious form of recognition to outstanding short-term and long-term safety performance by operating categories.
- The Association is an excellent forum for keeping up with latest OSHA standards.
- In-depth information on specific subjects is increasingly available at regional seminars. The cost of these seminars is minimized by virtue of holding them on a regional basis.
- The annual conference provides a fine external motivational boost to hourly Safety Committee members as recognition for their active participation in your safety program.
- The cost of membership is the lowest of any association to our knowledge.
- The attendance of vendors at our annual conference allows safety people to keep up with the latest safety equipment, tools and training.

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