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PPSA Quarterly Review

Pulp and Paper Safety Association (850) 584-3639

Website www.ppsa.org

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A Letter from Our Chairman



Happy New Year!! 2011 sure did go by fast.

The Board is presently working on the development of the 69th Annual Professional Development Conference. The Conference will be held the week of June 10th in Orlando, FL. The theme of this year's conference is "People Make the Difference" and as you can imagine there will be a variety of paper industry topics focused on improving the safety culture at your companies. I hope you will all attend.

We continue to explore partnerships with AF&PA and TAPPI in an effort to provide the best services possible to our members. We feel that PPSA is well positioned to be the best resource as regards occupational safety and health issues within the forest products industry. To that end, we will continue working on those services (i.e. website, safety stats, training, etc.) that offer value to our members.

The start of a new year always offers a fresh opportunity to improve our safety culture. I want to encourage you all to set the bar high this year and shoot for zero injuries. With hard work and dedication I am certain that you can meet this goal.

Thanks again for being a part of the PPSA family.

General Chairman – PPSA, Peter G. Masias





Article by: **Matthew Kanneberg**
Division Safety Manager,
Containerboard Mills
RockTenn Company
PPSA Board Member



Eric Fletty
V.P – Operations, TAPPI

Article by: **Matthew Kanneberg**



I would like to share some updates on several exciting collaborations that are in the evaluation and planning stages with TAPPI. PPSA and TAPPI are both organizations that are devoted to the Pulp, Paper and Forest Product Industry and both have a strong mission around teaching and education! Because of this education focus, collaborations with TAPPI will help us leverage our outreach, development and sharing of safety related information within our industry. TAPPI has made it very clear that they view the collective board and membership of the PPSA to be the safety experts within our industry. Please take a look at some of the current activities that we are working on to promote both organizations in the interest of employee safety.

TAPPI PaperCon 2012 Conference – New Orleans April 22-25:

PPSA is supporting the planning and development of a Young Professionals workshop session at the PaperCon Conference. The 2 hour session entitled “It’s Never Too Early (or Late) to Become a Safety Leader” is a collaboration of PPSA, TAPPI and their supporting members Weyerhaeuser, Domtar and RockTenn. The session will hit on challenges “new” leaders have in trying to engage employees to work as a team towards injury free. You will also hear from a leader with long term sustained injury free results and how these results were achieved. In conclusion the session will close on how all leaders in an organization work together with an understanding of the fundamentals of being a caring and committed leader...specifically in safety. For more information on the conference, please go to www.papercon.org.

Pulp, Paper and Forest Products Industry Safety Alert Forum:

PPSA and TAPPI are working to develop a centralized forum to receive and communicate our industry specific safety alerts. One of the great successes within our industry is collectively we are improving safety each year. Far fewer people are being injured in our industry compared to 15, 10 and even 5 years ago. The better we each get as a company, the fewer the internal learning’s (incidents, near misses, property damage, etc.). Therefore, we are working to find a better way to collectively share those remaining incidents across all of our member companies. Though these alerts make up a portion of our reactive and lagging data, these learning are invaluable to many to avoid similar incidents. Look to see this collaboration get off the ground mid-year 2012.

Safety Leadership Fundamentals – for leaders at all levels:

TAPPI is working to develop a 2-day leadership course specifically focused around the fundamentals of being a leader in safety. This course will target leaders at all levels whether you are a new leader or

have lots of experience and want to make sure you are up-to-date on the current best practices in leading and engaging employees in safety. Although there are lots of technical classes and courses in safety, there are fewer opportunities in our specific industry to align our leaders to a basic course that focuses on soft people skills, safety systems/process, and modern safety management. The class would include such topics as “cultivating safe behaviors”, engaging employees to participate in safety, measuring safety performance (lagging/leading indicators), understanding OSHA recordkeeping, incident investigation, and many others. The course will be a great entry level for safety fundamentals and most importantly how they all interlink to create the foundation for a strong safety culture! Look to see a product and pilot course in the second half of 2012.

Safety Webinars:

The PPSA is focused on training and outreach. We are in the early stages of evaluating how PPSA and TAPPI could collaborate on safety webinars. With TAPPI's experience in education and technical outreach, our goal is to leverage their area of expertise to help us utilize another forum for sharing and communicating safety related training and education through organized webinars. With several activities and collaborations already in the works, we will begin the evaluation and planning on this topic in the 3rd/4th quarters of 2012.

For more information about TAPPI, please go to <http://www.tappi.org/About-TAPPI.aspx>

NOTE: Matthew Kanneberg is a board member for the PPSA and a member of the TAPPI organization.

Meet the Board of Directors

Our association has been governed by a board of directors since its inception in 1944. Through those many years, countless hours have been freely given by board members in their sincere interest to improving safety in our industry. This column will allow you to get to know the current board better. They are always open to your comments, questions, and suggestions.

John Sunderland has been a member of our board since 1999. He currently serves as the Secretary/Treasurer and provides administrative overview for the association and the office, with the capable help of Leslee. He was conference chair for the 2003, which was held at the Caribe Royal in Orlando and is chairing this year's conference, which will be again at the Caribe. He served as General Chairman: 2003-2004. John works for Buckeye Technology as their corporate safety compliance manager.



John and his wife, Beverly, reside in Perry, Florida and they have two sons and daughters-in-law along with four grandchildren. He has been a volunteer Boy Scout leader for 40 years and his hobbies include flying, motorcycle riding and woodworking.



Leslee Sunderland is John and Beverly's daughter-in-law and has been providing administrative support for the association weekly since December of 2009 following assisting in membership registration renewal in 2008 and conference registration in 2009. She is married to Paul and they have two wonderful children: John Joseph (JJ) and Melissa. She likes to hunt and ride motorcycles when she has the chance. Leslee is instrumental in keeping association matters on the move.



Safety



An Owner-Operator pulling a set of chip doubles pulled up to the shops put the truck in neutral (*thought he had set his parking brake*) and went in for a brief visit at the terminal.

When he returned to the yard...his tractor and trailer were gone.





In moments, the un-manned truck and set of trailers (1) rolled through the yard (2) across a state highway (3) and down an embankment into a power pole next to railroad tracks.



Truck stopped here



The “What if’s” are terrifying!

What if a mechanic crawled under a wheel to check brakes?

What if a co-worker walked in front?

What if another vehicle was in the path on the highway?

That list could go on and on.



Lessons learned:

- Failure to follow any safety procedure may lead to disaster as easy as 1-2-3.
- Never let distractions or complacency interrupt your safety routine.
- Always use safety appropriate safety procedures when parking.

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Reaction Response

New Bern team comes through for a contractor in trouble

Submitted by Weyerhaeuser



At 9:45 a.m. Wednesday, March 16, everything was running smoothly at Weyerhaeuser's Cellulose Fibers mill in New Bern, N.C. By 10:15, employees were saving a life.

A maintenance contractor had been eating when he began to feel the first signs of an allergic reaction. He let co-workers know he had EpiPens® — prescription doses of epinephrine for managing allergic reactions in his car. While a few of his colleagues took him to the site's occupational health nurse, Norma Dunn, others called 911, alerted the mill's medical responders, and fetched the EpiPens.

"I injected him, and we waited for it to work," says Dunn, who previously had handled a severe reaction to a bee sting. But soon, anaphylactic shock set in, impairing his breathing and blood flow. "I couldn't even find his blood pressure," recalls Dunn.

Mill medical responders Greg Hamilton, Kim Taylor, Jimmy Harrell, Brenda Moore and Louis Toler and security team members Sharon Hooks and Christine Cooke helped manage the crisis, supplying oxygen, recording medical data, and communicating with the county's emergency responders, who'd been busy that morning on other calls and were delayed.

Amid the uproar, Dunn noticed the contractor's EpiPens had expired six months ago.

"He was deteriorating pretty fast, so we used our own EpiPen," she says. "As the ambulance arrived — the squad captain came from home to help — the contractor finally started responding."

He was rushed to the hospital, where emergency room staff later told him they'd never encountered such a severe allergic reaction and that he'd been "next door to the morgue." All agreed the quick response at the mill saved his life.

"We couldn't have done it without our volunteer medical responders," says Dunn, who explains that the role involves a rigorous 16 weeks of training, a state exam, and continuing education. "They do it because they care about other people, and we have to work as a team."

She doesn't miss the opportunity to advise everyone to pay attention to drug expiration dates and to recognize that allergies may be triggered in less obvious ways than you might think. That's why it's smart to advise co-workers of health issues from allergies to diabetes or heart conditions that could cause emergencies, because you never know when you might need a team response like the one so successful in New Bern.

Boise Inc. employees set new North American safety record at mill in DeRidder, Louisiana



DeRidder employees set a new safety record in January for the North American paper industry, surpassing the previous record of 9,541,889 hours worked without a lost-time accident.

David Ludolph, safety director, was asked how DeRidder has been able to surpass the performance of approximately sixty other facilities across the company. "First, we have mill and company leadership absolutely committed to safety. Second, we have good, clearly understood procedures and expectations in place. And third, employees are empowered to act on safety; to be willing to shut down operations they believe to be unsafe until the activity can be made safe. Most importantly, we have strong employee safety participation."

Workers have more than 22 ways they can participate in mill safety at DeRidder.

"Our participation includes using 'Stop, Think, Plan, and Go' every day to find ways to work as safely as we can," says David Martinez, maintenance mechanic and safety team leader for many years. That's just one component of a first-class safety program that led to their record-breaking performance.

Johnny Sharp joined Boise as an hourly worker 41 years ago and was recently named the production manager for the pulp/utilities/fiber department of the mill. "Today our people work together figuring out how they can be the safest they can be," he says. "Only after we know we are doing something the safest way, will we look at production".

E & I trainer Wayne Uran says, "I use SAFESTART™ to help me stay safe at work and at home."

Mark Haser, DeRidder mill manager, shares his thoughts on keeping strong safety commitment alive at a facility year after year. "The safety culture was already in place when I arrived in DeRidder almost two years ago. The challenge for me is continuing to build on it by keeping fresh, new ideas coming forward. I'm proud to be part of a team that helps each employee return home safely every day."

What about the “Green Cross”?

By John Sunderland



The Green Cross has been the recognized emblem for safety for many years. Did you ever wonder where it came from?

The Green Cross has symbolized efforts to improvement safety conditions for decades. More recently, it has come to be identified with the environment and identifying surroundings that are “green” or environmentally safe.

It seems that the original concept of “Green Cross for Safety” comes from the National Safety Council (NSC). It is not clear when the actual logo first appeared, but it has been a part of NSC’s printings for nearly as long as they have been in existence. The history of the NSC is pretty interesting itself.

In 1912 the first Cooperative Safety Congress was held in Milwaukee, Wisconsin. The event was sponsored by the Association of Iron and Steel Electrical Engineers. The approximately 200 attendees, representing industry and government, resolved to “organize and create a permanent body devoted to the promotion of the safety to human life in the industries of the United States.

At the Second Safety Congress in 1913, the National Council for Industrial Safety was established. It was headquartered in Chicago, Illinois. The name was changed to National Safety Council in 1914 to reflect the organization's expanded scope to include traffic and home safety. As membership increased, the NSC began producing posters, technical fact sheets, and other publications. In 1953, the U.S. Congress and President Dwight D. Eisenhower recognized the importance of the NSC’s efforts with a Congressional charter to: “...arouse and maintain the interest of the people of the United States... in safety and in accident prevention, and to encourage the adoption and institution of safety methods by all persons, corporations, and other organizations.”

The American Red Cross organization was founded in 1881 by Clara Barton, in Washington, D.C. following the International Red Cross. While the emblem for the Red Cross reflected assistance when there were calamities, in later years, the green cross became an emblem of efforts to protect people from having a calamity. The green cross is recognized as such and is included my many organizations logos for safety. Recently it has been used to track incidents for visual impact with the goal of completing the current month with all days safe: green.

While it is only a symbol, it does reflect efforts to maintain safe work and home environments so that everyone can be spared from the pain and suffering that accompanies accidents. Many thanks go to the National Safety Council for carrying this banner for so long.



2011 Year-End Safety Statistics

Change Notice: In order to provide more focus on leading safety indicators and lessen the focus on trailing safety indicators, the PPSA Board has decided to gather site safety statistics on a semiannual rather than quarterly basis.

Paper Mills #1- 2 million and over hours worked			Total OSHA Log	LWDC	RWDC	Fatalities	Total IR
COMPANY	CITY/Location Name	Hours	Cases (OSHA 300 log sum of col. G+H+I+J)	(OSHA 300 log col. H)	(OSHA log col. I)	(OSHA log col. G)	
International Paper	Courtland, AL *	2,508,947	10	4	1	0	0.80
Longview Fibre Paper & Pkg	Longview, WA	2,232,016	17	4	7	0	1.52
Domtar	Ashdown	2,174,984	17	12	0	0	1.56
Glatfelter	Ohio Operation, Chillicothe, OH	3,000,072	36	12	11	0	2.40
Glatfelter	Spring Grove, PA	2,337,492	32	11	10	0	2.74
Meadwestvaco	Covington, VA	2,459,598	37	11	3	0	3.01
		14,713,109	149	54	32	0	
Weighted Average for Category	*= Non-Member						2.0

Paper Mills #2- between 1 & 2 million hours worked			Total OSHA Log	LWDC	RWDC	Fatalities	Total IR
COMPANY	CITY/Location Name	Hours	Cases (OSHA 300 log sum of col. G+H+I+J)	(OSHA 300 log col. H)	(OSHA log col. I)	(OSHA log col. G)	
International Paper	Selma, AL *	1,694,046	1	0	0	0	0.12
International Paper	Eastover, SC *	1,306,423	4	1	1	0	0.61
International Paper	Georgetown, SC *	1,464,644	5	0	0	0	0.68
AbitibiBowater	Catawba, SC	1,922,186	8	3	4	0	0.83
International Paper	Riegelwood, NC *	1,770,526	8	0	4	0	0.90
International Paper	Savannah, GA *	1,319,269	6	3	2	0	0.91
Boise White Paper	Jackson, AL	1,058,415	5	1	1	0	0.94
International Paper	Texarkana, TX *	1,656,041	8	0	0	0	0.97
International Paper	Augusta, GA *	1,802,003	9	1	3	0	1.00
RockTenn	Demopolis, AL	1,042,900	6	1	2	0	1.15
International Paper	Cantonment, FL *	1,029,605	6	2	1	0	1.17
International Paper	Ticonderoga, NY *	1,330,271	8	0	0	0	1.20
Domtar	Windsor, Quebec	1,471,981	9	2	1	0	1.22
Weyerhaeuser	Longview, WA	1,095,862	7	4	0	0	1.28
Meadwestvaco	Evadale, TX	1,561,570	10	3	2	0	1.28
International Paper	Mansfield, LA *	1,354,310	9	2	0	0	1.33
Resolute Forest Products(AbitibiBowater)	Calhoun, TN	1,392,630	10	4	2	0	1.44
International Paper	Prattville, AL *	1,322,903	10	6	0	0	1.51
Finch Paper LLC.	Glen Falls, NY	1,815,155	22	8	3	0	2.42
RockTenn	Panama City, FL	1,030,041	14	5	3	0	2.72
Twin Rivers Paper Co.(Fraser Papers)	East Paper, Madawaska, ME	1,332,163	21	6	9	0	3.15
Thilmany Papers	Kaukauna	1,349,571	31	9	19	0	4.59
		31,122,515	217	61	57	0	
Weighted Average for Category	*= Non-Member						1.4

Paper Mills #3-less than 1 million hours worked			Total OSHA Log Cases (OSHA 300 log sum of col. G+H+I+J)	LWDC (OSHA 300 log col. H)	RWDC (OSHA log col. I)	Fatalities (OSHA log col. G)	Total IR
COMPANY	CITY/Location Name	Hours					
Buckeye Mt. Holly	Mt. Holly, NC	242,439	0	0	0	0	0.00
International Paper	Franklin, VA *	91,581	0	0	0	0	0.00
International Paper	Pineville, LA *	20,327	0	0	0	0	0.00
International Paper	Millersburg, OR *	7,007	0	0	0	0	0.00
Domtar	Kingsport, TN	692,357	1	0	0	0	0.29
Domtar	Marlboro, Bennettsville, SC	646,023	1	0	0	0	0.31
International Paper	Redwood, MS *	609,227	1	0	0	0	0.33
Boise	DeRidder, LA	933,165	2	0	0	0	0.43
Domtar	Hawesville, KY	444,475	1	0	0	0	0.45
Packaging Corp. of America	Tomahawk, WI	875,511	2	1	0	0	0.46
Domtar	Johnsonburg, PA	778,372	2	1	1	0	0.51
RockTenn	Hopewell, VA	611,320	2	22	10	0	0.65
International Paper	Springfield, OR *	559,338	2	1	0	0	0.72
International Paper	Valliant, OK *	667,433	3	0	0	0	0.90
RockTenn	Stevenson, AL	826,038	4	0	2	0	0.97
Weyerhaeuser	Columbus, MS	710,528	4	3	0	0	1.13
Mohawk Fine Papers	Cohoes Mill, NY	522,739	3	1	0	0	1.15
Weyerhaeuser	Norpac, Longview, WA	983,373	6	2	0	0	1.22
International Paper	Red River Mill, Campti, LA	780,206	5	3	3	0	1.28
Mohawk Fine Papers	Beckett Mill, Hamilton, OH	286,652	2	0	0	0	1.40
Temple-Inland #386	New Johnsonville, TN	383,568	3	0	0	0	1.56
Temple-Inland #389	Rome, GA	981,014	8	5	0	0	1.63
Temple-Inland #393	Orange, TX	815,987	7	3	0	0	1.72
Temple-Inland #390	Bogalusa, LA	931,104	8	1	2	0	1.72
International Paper	Pine Hill, AL *	889,555	8	2	4	0	1.80
Domtar	Nekoosa, WI	906,052	9	2	2	0	1.99
Mohawk Fine Papers	Waterford Mill, Waterford, NY	277,990	3	1	0	0	2.16
Interstate Paper	Riceboro, GA	530,815	7	0	0	0	2.64
New Page	Stevens Point, WI	658,572	9	1	3	0	2.73
Domtar	Port Huron, MI	511,559	7	3	2	0	2.74
FutureMark Paper Company	Alsip	357,907	5	3	0	0	2.79
RockTenn	Coshocton, OH	440,336	7	2	1	0	3.18
Green Bay Packaging	Arkansas Kraft, AR	784,011	13	3	2	0	3.32
Domtar	Rothschild, WI	821,757	15	7	4	0	3.65
Orchids Paper Products	Pryor, OK	587,386	14	180	0	2	4.77
UPM Madison (Madison Paper Industries)	Madison, Maine	487,380	16	8	2	0	6.57
Weighted Average for Category	* = Non-Member						1.7
		21,410,665	180	255	38	2	

100% Recycle Mills			Total OSHA Log	LWDC	RWDC	Fatalities	
COMPANY	CITY/Location Name	Hours	Cases (OSHA 300 log sum of col. G+H+I+J)	(OSHA 300 log col. H)	(OSHA log col. I)	(OSHA log col. G)	Total IR
International Paper	Cedar Rapids, IA *	481,427	0	0	0	0	0.00
Sonoco	Hutchinson, KS	246,430	0	0	0	0	0.00
Sonoco	Richmond, VA	207,804	0	0	0	0	0.00
International Paper	Oxnard, CA *	204,871	0	0	0	0	0.00
Temple-Inland #392	Ontario, CA	194,088	0	0	0	0	0.00
RockTenn	Uncasville, CT	190,096	0	0	0	0	0.00
International Paper	Henderson, KY *	180,765	0	0	0	0	0.00
Sonoco	Sumner, WA	121,790	0	0	0	0	0.00
International Paper	Xalapa *	299,522	1	1	0	0	0.67
Temple-Inland #391	Maysville, KY	243,176	1	0	0	0	0.82
Weyerhaeuser	Columbus Modified Fiber, MS	229,772	1	1	0	0	0.87
Fibrex	Menominee, MI(Menominee Mill)	206,407	1	0	0	0	0.97
Temple-Inland #385	Newport, IN	287,339	2	0	0	0	1.39
Sonoco	Holyoke, MA	137,172	1	0	0	0	1.46
Sonoco	Menasha, WI	238,938	2	1	0	0	1.67
Fibrex	Menominee, MI(Fairmont Mill)	238,754	2	0	0	0	1.68
Sonoco	City Of Industry, CA	106,922	1	0	0	0	1.87
SP Newsprint Co., LLC	Dublin, GA	631,889	6	5	0	0	1.90
Sonoco	Newport, TN	205,039	2	2	0	0	1.95
RockTenn	Seminole Mill, Jacksonville, FL	378,153	4	3	0	0	2.12
Sonoco	Hartsville, SC	1,196,478	15	2	0	0	2.51
Green Bay Packaging	Green Bay, WI	295,462	6	0	4	0	4.06
Hartford City Paper	Hartford City, IN	178,092	4	1	3	0	4.49
Sonoco	DePere, WI	119,722	3	1	0	0	5.01
Weighted Average for Category	*= Non-Member						1.6
		6,338,681	52	17	7	0	

Pulpmills			Total OSHA Log	LWDC	RWDC	Fatalities	
COMPANY	CITY/Location Name	Hours	Cases (OSHA 300 log sum of col. G+H+I+J)	(OSHA 300 log col. H)	(OSHA log col. I)	(OSHA log col. G)	Total IR
Weyerhaeuser	Grand Prairie, AB	608,430	0	0	0	0	0.00
Weyerhaeuser	Flint River, GA	554,177	1	0	0	0	0.36
Domtar	Espanola, Ontario	537,395	1	0	1	0	0.37
Weyerhaeuser	Port Wentworth, WA	593,230	2	1	0	1	0.67
Domtar	Espanola, Ontario	1,038,063	4	1	2	0	0.77
Domtar	Plymouth, NC	979,047	5	3	0	0	1.02
Domtar	Hawesville, KY	493,340	3	2	0	0	1.22
Domtar	Kamloops, BC	867,624	6	1	0	0	1.38
Domtar	Dryden, Ont.	693,696	5	0	0	0	1.44
Rayonier	Jesup, GA	1,858,698	15	9	1	0	1.61
Rayonier	Fernandina Beach	676,169	6	2	3	0	1.77
Buckeye Technologies	Memphis, TN	314,059	3	2	1	0	1.91
Weyerhaeuser	New Bern, NC	579,475	6	3	0	0	2.07
Buckeye Florida	Perry, FL	1,276,544	16	8	0	0	2.51
		11,069,947	73	32	8	1	
Weighted Average for Category							1.3

Folding Carton			Total OSHA Log	LWDC	RWDC	Fatalities	
COMPANY	CITY/Location Name	Hours	Cases (OSHA 300 log sum of col. G+H+I+J)	(OSHA 300 log col. H)	(OSHA log col. I)	(OSHA log col. G)	Total IR
Green Bay Packaging	Depere, WI	222,910	10	1	4	0	8.97
		222,910	10	1	4	0	
Weighted Average for Category							8.97
*= Non-Member							

Box Plants - with corrugator			Total OSHA Log	LWDC	RWDC	Fatalities	
COMPANY	CITY/Location Name	Hours	Cases (OSHA 300 log sum of col. G+H+I+J)	(OSHA 300 log col. H)	(OSHA log col. I)	(OSHA log col. G)	Total IR
International Paper	Juarez, MX*	445,782	0	0	0	0	0.00
International Paper	Silao, MX*	394,754	0	0	0	0	0.00
International Paper	Manitowoc, WI*	334,625	0	0	0	0	0.00
International Paper	Mt Carmel, PA*	311,784	0	0	0	0	0.00
International Paper	Lynchburg, VA*	298,770	0	0	0	0	0.00
International Paper	San Antonio, TX*	268,443	0	0	0	0	0.00
International Paper	Austin, MN*	255,058	0	0	0	0	0.00
International Paper	Rockford, IL*	249,534	0	0	0	0	0.00
International Paper	Griffin, GA*	230,461	0	0	0	0	0.00
International Paper	Mt. Vernon, OH*	228,734	0	0	0	0	0.00
International Paper	Modesto, CA*	222,657	0	0	0	0	0.00
International Paper	Newton, NC*	216,750	0	0	0	0	0.00
International Paper	Belleville, IL*	212,562	0	0	0	0	0.00
International Paper	Fort Wayne, IN*	210,363	0	0	0	0	0.00
International Paper	Savannah, GA*	206,261	0	0	0	0	0.00
International Paper	Carson, GA*	204,726	0	0	0	0	0.00
International Paper	Newark, OH*	187,159	0	0	0	0	0.00
International Paper	Forest Park, GA *	177,236	0	0	0	0	0.00
International Paper	Magnolia, MS*	155,859	0	0	0	0	0.00
International Paper	Ocotlan, Coronango, MX*	145,593	0	0	0	0	0.00
International Paper	Indianapolis Spacekraft, IN*	124,099	0	0	0	0	0.00
International Paper	Bellevue, WA*	48,540	0	0	0	0	0.00
International Paper	Hidalgo, TX*	24,560	0	0	0	0	0.00
International Paper	Hanford, CA*	15,116	0	0	0	0	0.00
International Paper	Memphis, TN*	11,232	0	0	0	0	0.00
International Paper	Hammond, IN*	10,221	0	0	0	0	0.00
International Paper	Kansas City, KS*	7,071	0	0	0	0	0.00
International Paper	Jonesboro, AR*	3,432	0	0	0	0	0.00
International Paper	Vernon, CA*	3,362	0	0	0	0	0.00
International Paper	Cedarburg, WI*	1,987	0	0	0	0	0.00
International Paper	Stockbridge, GA*	583	0	0	0	0	0.00
International Paper	Hartford City, IN*	572	0	0	0	0	0.00
RockTenn	Fresno, California	330,237	0	1	0	0	0.00
Temple-Inland #039	Kansas City, KS	205,306	0	0	0	0	0.00
Temple-Inland #042	Ontario, CA	173,371	0	0	0	0	0.00
Temple-Inland #077	Tampa, FL	73,549	0	0	0	0	0.00
International Paper	Bowling Green, KY*	412,729	1	0	0	0	0.48
Temple-Inland #037	Lexington, SC	377,940	1	1	0	0	0.53
International Paper	Ixtac, MX*	630,245	2	2	0	0	0.63
Temple-Inland #152	Binghamton, NY	312,877	1	1	0	0	0.64
International Paper	Conway, AR*	297,231	1	1	0	0	0.67
Temple-Inland #048	Elgin, IL	291,582	1	0	0	0	0.69
International Paper	Lithonia, GA*	284,924	1	0	0	0	0.70
International Paper	Yuma, AZ*	278,788	1	0	0	0	0.72

International Paper	Lafayette, LA*	274,033	1	0	0	0	0.73
Temple-Inland #023	Spotswood, NJ	271,282	1	0	0	0	0.74
International Paper	Cedar Rapids, IA*	264,488	1	1	0	0	0.76
International Paper	Kansas City, MO*	262,814	1	1	0	0	0.76
International Paper	Monterrey, MX*	258,977	1	0	0	0	0.77
International Paper	White Bear Lake, MN*	250,800	1	0	0	0	0.80
International Paper	La Colmena, MX*	733,250	3	0	0	0	0.82
International Paper	Arden Hills, MN*	240,647	1	1	0	0	0.83
Temple-Inland #171	Crockett-Santa Fe Springs	467,034	2	2	0	0	0.86
International Paper	Des Plaines, IL*	231,005	1	0	1	0	0.87
International Paper	Charlotte, NC*	224,644	1	0	0	0	0.89
International Paper	Elk Grove, CA*	224,319	1	0	1	0	0.89
International Paper	Carrollton, TX*	222,154	1	0	0	0	0.90
Green Bay Packaging	Ft. Worth, TX	222,059	1	0	0	0	0.90
International Paper	Statesville, NC*	217,695	1	0	0	0	0.92
International Paper	Amarillo, TX*	210,438	1	0	1	0	0.95
International Paper	Olive Branch, MS*	208,800	1	0	0	0	0.96
International Paper	Lumberton, NC*	204,660	1	0	0	0	0.98
International Paper	Aurora, IL*	193,484	1	0	0	0	1.03
Temple-Inland #067	Bogalusa	376,405	2	2	0	0	1.06
Temple-Inland #022	St. Louis (Fenton), MO	176,647	1	1	0	0	1.13
International Paper	Lake Wales, FL*	174,825	1	0	0	0	1.14
Temple-Inland #280	Indianapolis Stout Field	662,096	4	2	1	0	1.21
Temple-Inland #018	Minden LA	163,523	1	1	0	0	1.22
International Paper	Solon, OH*	162,249	1	1	0	0	1.23
Temple-Inland #158	Warren County, NC	316,998	2	1	1	0	1.26
Temple-Inland #031	Bell (Los Angeles, CA)	299,227	2	0	1	0	1.34
International Paper	Columbus, GA*	148,191	1	0	0	0	1.35
International Paper	Bellmawr, NJ*	147,600	1	0	0	0	1.36
International Paper	Fort Smith, AR*	290,748	2	0	0	0	1.38
International Paper	Delaware, OH*	279,635	2	0	0	0	1.43
International Paper	Auburn, ME*	277,587	2	2	0	0	1.44
International Paper	Decatur, AL*	274,603	2	0	0	0	1.46
International Paper	Three Rivers, MI*	264,459	2	1	0	0	1.51
International Paper	Santa Paula, CA*	130,754	1	0	1	0	1.53
Temple-Inland #010	Orlando, FL	261,251	2	0	0	0	1.53
International Paper	Wooster, OH*	258,056	2	0	0	0	1.55
Temple-Inland #027	Crawfordsville, IN	384,796	3	0	0	0	1.56
Temple-Inland #076	San Antonio, TX	255,848	2	0	0	0	1.56
International Paper	Beaverton, OR *	251,503	2	0	0	0	1.59
International Paper	Omaha, NE*	248,520	2	1	0	0	1.61
International Paper	Lancaster, PA*	123,011	1	0	0	0	1.63
International Paper	Edinburg, TX*	240,660	2	0	0	0	1.66
Longview Fibre Paper & Packaging	Longview, WA	1,535,403	13	2	9	0	1.69
International Paper	Rochester, NY*	232,795	2	1	1	0	1.72
International Paper	Fridley, MN*	115,371	1	0	0	0	1.73
International Paper	Houston, MS *	228,448	2	0	1	0	1.75
International Paper	Portland, OR*	228,411	2	0	0	0	1.75
International Paper	Compton, CA*	226,666	2	0	0	0	1.76

International Paper	Indianapolis, IN*	226,527	2	1	0	0	1.77
International Paper	Fond Du Lac, WI*	222,826	2	0	0	0	1.80
International Paper	Sealy, TX*	222,319	2	1	0	0	1.80
Green Bay Packaging	El Paso, TX	215,459	2	0	2	0	1.86
Temple-Inland #016	Carrollton (Dallas, TX)	215,180	2	0	1	0	1.86
International Paper	Barrington, NJ *	314,141	3	2	0	0	1.91
International Paper	El Paso, TX *	207,713	2	2	0	0	1.93
International Paper	Louisville, KY*	197,621	2	1	1	0	2.02
International Paper	Modesto Riverside, CA*	287,929	3	1	1	0	2.08
International Paper	Bay Minette, AL *	283,827	3	1	1	0	2.11
International Paper	Golden, CO*	188,579	2	0	0	0	2.12
International Paper	Eighty Four, PA*	188,071	2	0	0	0	2.13
International Paper	St. Joseph, MO*	281,834	3	0	1	0	2.13
International Paper	Exeter, CA*	279,935	3	2	0	0	2.14
Temple-Inland #038	Garden City, KS	183,896	2	1	1	0	2.18
International Paper	Oklahoma City, OK*	177,851	2	0	1	0	2.25
International Paper	Laurens, SC *	353,587	4	1	2	0	2.26
International Paper	Lincoln, IL*	176,588	2	1	1	0	2.27
International Paper	Silanas, CA *	264,006	3	0	2	0	2.27
International Paper	Montgomery, IL*	263,024	3	2	0	0	2.28
International Paper	Georgetown, SC*	262,201	3	0	1	0	2.29
International Paper	Jackson, MS*	248,719	3	2	0	0	2.41
Temple-Inland #009	Streetsboro, OH	248,686	3	2	1	0	2.41
International Paper	Lexington, KY*	242,881	3	1	1	0	2.47
International Paper	Butler, IN *	239,857	3	0	1	0	2.50
International Paper	Richmond, VA*	235,522	3	0	0	0	2.55
International Paper	Tampa, FL*	306,731	4	0	0	0	2.61
Green Bay Packaging	DePere, WI	153,096	2	1	1	0	2.61
Temple-Inland #033	Ft. Smith AR	227,742	3	1	0	0	2.63
International Paper	Eaton, OH*	225,629	3	0	0	0	2.66
International Paper	Russellville, AR *	298,312	4	0	0	0	2.68
International Paper	Union Gap, WA *	223,578	3	0	2	0	2.68
International Paper	Springhill, LA*	295,971	4	0	2	0	2.70
Temple-Inland #014	El Centro - Imperial Valley, CA	291,310	4	2	2	0	2.75
Temple-Inland #019	Shakopee (Minneapolis, MN)	217,010	3	2	0	0	2.76
International Paper	Waterloo, IA*	139,799	2	1	0	0	2.86
International Paper	Putnam, CT*	207,564	3	0	0	0	2.89
International Paper	Bedford Park, IL*	272,394	4	0	0	0	2.94
International Paper	Morristown, TN*	262,474	4	1	0	0	3.05
International Paper	McAllen, TX*	260,435	4	1	0	0	3.07
International Paper	Camarillo, CA *	194,665	3	0	1	0	3.08
Temple-Inland #034	Wheat Ridge, CO	253,523	4	4	0	0	3.16
International Paper	Olympia, WA *	252,284	4	0	1	0	3.17
International Paper	Murfreesboro, TN *	312,915	5	0	2	0	3.20
International Paper	Kalamazoo, MI*	187,320	3	1	1	0	3.20
Temple-Inland #070	Gilroy, CA Box Plant	247,095	4	0	0	0	3.24
Temple-Inland #020	Tracy, CA	415,298	7	2	2	0	3.37
International Paper	Chihuahua, MX*	58,951	1	0	0	0	3.39

Temple-Inland #068	Carol Stream, IL	57,938	1	0	1	0	3.45
International Paper	Salem, OR*	57,387	1	0	0	0	3.49
Green Bay Packaging	Fremont, OH	225,181	4	1	2	0	3.55
International Paper	Anaheim, CA *	329,270	6	2	1	0	3.64
International Paper	Grand Prairie, TX *	264,141	5	0	2	0	3.79
International Paper	Northlake, IL *	209,210	4	0	0	0	3.82
Green Bay Packaging	GB Shipping Cont., WI	558,042	11	0	4	0	3.94
International Paper	Moses Lake, WA *	199,493	4	1	0	0	4.01
Green Bay Packaging	Baltimore, MD	194,005	4	0	1	0	4.12
Green Bay Packaging	Wausau, WI	360,900	8	2	1	0	4.43
International Paper	Tolleson, AZ*	269,946	6	0	2	0	4.45
International Paper	Chicago, IL *	168,008	4	1	0	0	4.76
Green Bay Packaging	Kalamazoo, MI	324,575	9	1	2	0	5.55
Green Bay Packaging	Cincinnati, OH	177,770	5	0	1	0	5.63
International Paper	Plant City, FL *	160,820	5	0	2	0	6.22
Green Bay Packaging	Twin Tower, MN	271,332	9	2	3	0	6.63
International Paper	Cleveland, TN *	206,314	7	4	0	0	6.79
International Paper	Bedford Park, IL *	54,953	2	1	0	0	7.28
International Paper	Sanger, CA *	274,693	11	3	3	0	8.01
Green Bay Packaging	Tulsa, OK	184,378	8	0	1	0	8.68
International Paper	Spartanburg, OH *	20,589	1	0	0	0	9.71
Weighted Average for Category	*= Non-Member						1.9
		38,451,573	356	81	76	0	

Box Plants without a corrugator			Total OSHA Log	LWDC	RWDC	Fatalities	
COMPANY	CITY/Location Name	Hours	Cases (OSHA 300 log sum of col. G+H+I+J)	(OSHA 300 log col. H)	(OSHA log col. I)	(OSHA log col. G)	Total IR
Temple-Inland #046	Elizabethton Sheet Plant, TN	192,831	0	0	0	0	0.00
Temple-Inland #176	Bayline Sheet Plant	69,572	0	0	0	0	0.00
Temple-Inland #001	Milltown (was Middlesex), NJ	68,350	0	0	0	0	0.00
Temple-Inland #047	Littlestown, PA	60,766	0	0	0	0	0.00
Green Bay Packaging	Chickasha, OK	59,608	0	0	0	0	0.00
Longview Fibre Paper & Pg	Longview, Washington	46,958	0	0	0	0	0.00
Temple-Inland #043	Ashand City Sheet, TN	38,173	0	0	0	0	0.00
Temple-Inland #291	Mack Chicago, IL	222,859	1	0	0	0	0.90
Temple-Inland #154	Madison, OH	193,685	1	0	0	0	1.03
Temple-Inland #155	Buffalo, NY	131,103	1	0	0	0	1.53
Temple-Inland #003	Ft. Smith, AR	96,954	1	0	0	0	2.06
Temple-Inland #159	St. Anthony, IN	89,091	1	0	0	0	2.24
Temple-Inland #170	Crockett-Buena Park, CA	277,180	5	4	0	0	3.61
Temple-Inland #156	Scotia, NY	43,727	1	0	0	0	4.57
Weighted Average for Category							1.6
		1,398,026	11	4	0	0	

Sawmills			Total OSHA Log Cases (OSHA 300 log sum of col. G+H+I+J)	LWDC (OSHA 300 log col. H)	RWDC (OSHA log col. I)	Fatalities (OSHA log col. G)	Total IR
COMPANY	CITY/Location Name	Hours					
Temple-Inland #122	Rome Sawmill	377,362	0	0	0	0	0.00
Rayonier	Baxley, GA	274,242	0	0	0	0	0.00
Rayonier	Eatonton, GA	165,730	0	0	0	0	0.00
Temple-Inland #101/Z 32	Buna Lumber, TX	6,822	0	0	0	0	0.00
Temple-Inland #121/Z37	Pineland Lumber	452,080	2	0	0	0	0.88
Temple-Inland #131/X37	Pineland Complex Services, TX	211,832	1	0	0	0	0.94
Rayonier	Swainsboro, GA	208,513	2	2	0	0	1.92
Temple-Inland #123/Z 33	Southwest La - De Quincy	393,308	4	0	1	0	2.03
Temple-Inland #105/Z04	Diboll Lumber	402,191	7	0	5	0	3.48
Green Bay Packaging	Pincrest, AR	156,422	5	0	0	0	6.39
Meadwestvaco	Cottonton, AL	388,436	13	6	3	0	6.69
		3,036,938	34	8	9	0	
Weighted Average for Category							2.2

Distribution Centers			Total OSHA Log Cases (OSHA 300 log sum of col. G+H+I+J)	LWDC (OSHA 300 log col. H)	RWDC (OSHA log col. I)	Fatalities (OSHA log col. G)	Total IR
COMPANY	CITY/Location Name	Hours					
International Paper	Cincinnati - X, OH *	279,859	0	0	0	0	0.0
International Paper	Stone Mountain, GA *	254,898	0	0	0	0	0.0
International Paper	Dallas, TX *	228,807	0	0	0	0	0.0
International Paper	Greensboro-X, NC *	220,819	0	0	0	0	0.0
International Paper	Camp Hill, PA *	206,290	0	0	0	0	0.0
International Paper	Rochester - X, NY *	201,588	0	0	0	0	0.0
International Paper	Minneapolis - X, MN *	196,601	0	0	0	0	0.0
International Paper	Valley View, OH *	179,731	0	0	0	0	0.0
International Paper	Portland, OR - X *	177,028	0	0	0	0	0.0
International Paper	Reynosa, Tam., OO *	171,213	0	0	0	0	0.0
International Paper	Nashville, TN *	143,470	0	0	0	0	0.0
International Paper	Hayward/Printing, CA *	140,836	0	0	0	0	0.0
International Paper	Lexington, KY *	133,301	0	0	0	0	0.0
International Paper	Fenton, MO *	129,072	0	0	0	0	0.0
International Paper	Morrisville, NC *	129,052	0	0	0	0	0.0
International Paper	Addison, IL *	129,043	0	0	0	0	0.0
International Paper	Saalfeld - Atlanta, GA *	126,578	0	0	0	0	0.0
International Paper	Vancouver, OO *	113,420	0	0	0	0	0.0
International Paper	Houston - X, TX *	111,528	0	0	0	0	0.0
International Paper	Orlando - X, FL *	95,404	0	0	0	0	0.0
International Paper	Brampton, OO *	89,408	0	0	0	0	0.0
International Paper	Salem, VA *	86,527	0	0	0	0	0.0

International Paper	Ankeny, IA *	84,749	0	0	0	0	0.0
International Paper	El Paso- X, TX *	81,583	0	0	0	0	0.0
International Paper	Oklahoma City- X, OK *	79,768	0	0	0	0	0.0
International Paper	Indianapolis - X, IN *	77,831	0	0	0	0	0.0
Mohawk Fine Papers, Inc.	Albany, NY	73,633	0	0	0	0	0.0
International Paper	Fresno, CA *	73,325	0	0	0	0	0.0
International Paper	Omaha- X, NE *	70,718	0	0	0	0	0.0
International Paper	Cheektowaga, NY *	67,859	0	0	0	0	0.0
International Paper	West Haven, CT *	66,824	0	0	0	0	0.0
International Paper	Grove City, OH *	63,413	0	0	0	0	0.0
International Paper	Lynchburg, VA *	61,022	0	0	0	0	0.0
International Paper	Wilkes-Barr, PA *	59,762	0	0	0	0	0.0
International Paper	Springfield, MO *	57,789	0	0	0	0	0.0
International Paper	Tulsa-X, OK *	56,500	0	0	0	0	0.0
International Paper	Wichita, KS *	54,308	0	0	0	0	0.0
International Paper	Calgary, OO *	51,410	0	0	0	0	0.0
International Paper	Billings, MT *	50,565	0	0	0	0	0.0
International Paper	Syracuse, NY *	49,753	0	0	0	0	0.0
International Paper	Miramar, FL *	49,169	0	0	0	0	0.0
International Paper	Cincinnati Nat. Accts, OH *	49,152	0	0	0	0	0.0
International Paper	Memphis- X, TN *	47,457	0	0	0	0	0.0
International Paper	Salt Lake City-Z, UT *	46,863	0	0	0	0	0.0
International Paper	Honolulu, HI *	46,544	0	0	0	0	0.0
International Paper	Ft. Smith, AR *	45,460	0	0	0	0	0.0
International Paper	Sacramento-X, CA *	37,339	0	0	0	0	0.0
International Paper	Memphis Nat. Accts, TN *	37,024	0	0	0	0	0.0
International Paper	Sparks, NV *	36,036	0	0	0	0	0.0
International Paper	Edmonton, OO *	33,528	0	0	0	0	0.0
International Paper	Alexandria, LA *	32,668	0	0	0	0	0.0
International Paper	Fort Wayne-Corp, IN *	32,518	0	0	0	0	0.0
International Paper	La Mirada, CA Nat. Accts *	32,326	0	0	0	0	0.0
International Paper	Greenville-X, SC *	31,696	0	0	0	0	0.0
International Paper	Salt Lake City - W, UT *	30,480	0	0	0	0	0.0
International Paper	Boise, ID *	29,494	0	0	0	0	0.0
International Paper	San Antonio-X, TX *	28,667	0	0	0	0	0.0
International Paper	Stevens Point, WI *	25,492	0	0	0	0	0.0
International Paper	Joplin, MO *	24,610	0	0	0	0	0.0
International Paper	Shreveport, LA *	24,420	0	0	0	0	0.0
International Paper	Topeka, KS *	24,196	0	0	0	0	0.0
International Paper	Fargo, ND *	24,136	0	0	0	0	0.0
International Paper	Columbia, MO *	23,621	0	0	0	0	0.0
International Paper	El Paso Custom Svcs, TX *	23,519	0	0	0	0	0.0
International Paper	Albany - X, NY *	23,446	0	0	0	0	0.0
International Paper	Cleveland, OH *	22,316	0	0	0	0	0.0
International Paper	Colorado Springs-X, CO *	21,941	0	0	0	0	0.0
International Paper	Appleton, WI *	20,124	0	0	0	0	0.0
International Paper	Wilmington, NC *	19,878	0	0	0	0	0.0
International Paper	Denver - Ps, CO *	18,685	0	0	0	0	0.0
International Paper	Cincinnati- Arvey, OH *	17,504	0	0	0	0	0.0
International Paper	Troy, MI *	17,445	0	0	0	0	0.0
International Paper	Jacksonville - X, FL *	17,099	0	0	0	0	0.0
International Paper	Albuquerque - X, NM *	17,057	0	0	0	0	0.0
International Paper	San Diego - X, CA *	17,044	0	0	0	0	0.0

International Paper	Irvine, CA *	16,857	0	0	0	0	0.0
International Paper	Portland, OR *	16,602	0	0	0	0	0.0
International Paper	Omaha, NE - Nat. Accts *	16,234	0	0	0	0	0.0
International Paper	Las Vegas - X, NV *	16,125	0	0	0	0	0.0
International Paper	Kimberly, WI *	15,351	0	0	0	0	0.0
International Paper	Indianapolis- Arvey, IN *	15,261	0	0	0	0	0.0
International Paper	Salt Lake City- Ps, Utv*	14,805	0	0	0	0	0.0
International Paper	Kansas City, MO *	14,654	0	0	0	0	0.0
International Paper	Burlington, NJ *	14,411	0	0	0	0	0.0
International Paper	Chicago, IL *	14,059	0	0	0	0	0.0
International Paper	Bristol, TN *	13,539	0	0	0	0	0.0
International Paper	Spokane, WA *	13,344	0	0	0	0	0.0
International Paper	Winston Salem, NC *	13,342	0	0	0	0	0.0
International Paper	San Diego-P&G/Areo, CA *	12,430	0	0	0	0	0.0
International Paper	Dayton P & G, OH *	12,393	0	0	0	0	0.0
International Paper	Baltimore, MD *	12,201	0	0	0	0	0.0
International Paper	Yakima, WA *	11,804	0	0	0	0	0.0
International Paper	E. Syracuse, NE *	11,790	0	0	0	0	0.0
International Paper	Fairfax, VA *	11,251	0	0	0	0	0.0
International Paper	Louisville-P&G, KY *	11,201	0	0	0	0	0.0
International Paper	Augusta, GA *	11,116	0	0	0	0	0.0
International Paper	Stockton, CA *	11,038	0	0	0	0	0.0
International Paper	Pittsburgh- Arvey. PA *	11,026	0	0	0	0	0.0
International Paper	Buffalo Grove, IL *	10,990	0	0	0	0	0.0
International Paper	Orem, UT *	10,731	0	0	0	0	0.0
International Paper	St. Louis-P&G/Lilburn, MO *	10,601	0	0	0	0	0.0
International Paper	Tampa-P&G, FL *	10,514	0	0	0	0	0.0
International Paper	New York - Stratlgic, NY *	10,480	0	0	0	0	0.0
International Paper	Bloominton, MN *	10,471	0	0	0	0	0.0
International Paper	Louisville -Arvey, KY *	10,437	0	0	0	0	0.0
International Paper	Philadelphia P&G / Spg Gdn *	10,384	0	0	0	0	0.0
International Paper	Tempe, AZ *	10,316	0	0	0	0	0.0
International Paper	Newport, DE *	10,296	0	0	0	0	0.0
International Paper	Austin, TX *	10,187	0	0	0	0	0.0
International Paper	Houston-P&G/Taylor, TX *	10,017	0	0	0	0	0.0
International Paper	El Paso -P&G, TX *	9,929	0	0	0	0	0.0
International Paper	Eugene, OR *	9,862	0	0	0	0	0.0
International Paper	Norcross, GA *	9,682	0	0	0	0	0.0
International Paper	Richmond-P&G, VA *	9,593	0	0	0	0	0.0
International Paper	Van Nuys, CA *	9,563	0	0	0	0	0.0
International Paper	St Petersburg, FL *	9,487	0	0	0	0	0.0
International Paper	Philadelphia-P&G, PA *	9,469	0	0	0	0	0.0
International Paper	Gardena, CA *	9,128	0	0	0	0	0.0
International Paper	Charleston-X, SC *	9,042	0	0	0	0	0.0
International Paper	Tulsa-P&G, OK *	9,007	0	0	0	0	0.0
International Paper	Seattle, WA *	8,977	0	0	0	0	0.0
International Paper	Rochester, NY *	8,972	0	0	0	0	0.0
International Paper	Chattanooga, TN *	8,958	0	0	0	0	0.0
International Paper	Lubbock, TX *	8,941	0	0	0	0	0.0
International Paper	Flint, MI *	8,899	0	0	0	0	0.0
International Paper	Roseville-P&G, MI *	8,868	0	0	0	0	0.0
International Paper	Raleigh, NC *	8,807	0	0	0	0	0.0

International Paper	Davenport, IA *	8,798	0	0	0	0	0.0
International Paper	Little Rock P&G, AR *	8,761	0	0	0	0	0.0
International Paper	Stamford, CT *	8,602	0	0	0	0	0.0
International Paper	Salt Lake City- Arvey, UT *	8,588	0	0	0	0	0.0
International Paper	Sacramento-P&G/Vine, CA *	8,582	0	0	0	0	0.0
International Paper	Colorado Springs - Ps, CO *	8,469	0	0	0	0	0.0
International Paper	Ann Arbor, MI *	8,369	0	0	0	0	0.0
International Paper	Rochester P&G, NY *	8,343	0	0	0	0	0.0
International Paper	Havertown, PA *	8,268	0	0	0	0	0.0
International Paper	St. Louis-P&G/Kings, MO *	8,255	0	0	0	0	0.0
International Paper	Charlotte-P&G/Mint, NC *	8,235	0	0	0	0	0.0
International Paper	Jacksonville -P&G, FL *	8,022	0	0	0	0	0.0
International Paper	Anaheim, CA *	8,020	0	0	0	0	0.0
International Paper	Ft Lauderdale, FL *	7,775	0	0	0	0	0.0
International Paper	Livonia, MI *	7,663	0	0	0	0	0.0
International Paper	Minneapolis-P&G, MN *	7,511	0	0	0	0	0.0
International Paper	Columbus, OH *	7,451	0	0	0	0	0.0
International Paper	Oklahoma City-P&G, OK *	7,363	0	0	0	0	0.0
International Paper	Port Huron, MI *	7,113	0	0	0	0	0.0
International Paper	Orlando-P&G/Colonial, FL *	7,014	0	0	0	0	0.0
International Paper	Westbury, NY *	6,963	0	0	0	0	0.0
International Paper	Memphis-P&G/Quince, TN *	6,817	0	0	0	0	0.0
International Paper	Hackensack, NJ *	6,808	0	0	0	0	0.0
International Paper	Farmingdale, NY *	6,747	0	0	0	0	0.0
International Paper	Quincy, MA *	6,706	0	0	0	0	0.0
International Paper	Woburn, MA *	6,478	0	0	0	0	0.0
International Paper	Wenatchee, WAS *	6,353	0	0	0	0	0.0
International Paper	North Canton, OH *	6,151	0	0	0	0	0.0
International Paper	Oak Park, MI *	6,107	0	0	0	0	0.0
International Paper	Grand Rapids P & G, MI *	6,027	0	0	0	0	0.0
International Paper	Lenexa, KS *	5,897	0	0	0	0	0.0
International Paper	Albuquerque-P&G, NM *	5,881	0	0	0	0	0.0
International Paper	Scranton, PA *	5,864	0	0	0	0	0.0
International Paper	Lansing, MI *	5,861	0	0	0	0	0.0
International Paper	Memphis-P&G/Union, TN *	5,652	0	0	0	0	0.0
International Paper	Greenville-P&G, SC *	5,283	0	0	0	0	0.0
International Paper	Sioux City, IA *	5,250	0	0	0	0	0.0
International Paper	Dayton-X, OH *	4,971	0	0	0	0	0.0
International Paper	Norfolk, VA *	4,958	0	0	0	0	0.0
International Paper	San Jose, CA *	4,850	0	0	0	0	0.0
International Paper	Atlanta, GA *	4,846	0	0	0	0	0.0
International Paper	Albany P&G, NY *	4,610	0	0	0	0	0.0
International Paper	Santa Ana, CA *	4,590	0	0	0	0	0.0
International Paper	Cedar Rapids, IA *	4,576	0	0	0	0	0.0
International Paper	San Antonio-P&G, TX *	4,541	0	0	0	0	0.0
International Paper	Montclair, CA *	4,472	0	0	0	0	0.0
International Paper	Brampton, OO *	4,470	0	0	0	0	0.0
International Paper	Los Angeles, CA *	4,304	0	0	0	0	0.0
International Paper	Markham, OO *	4,101	0	0	0	0	0.0
International Paper	Issaquah, WA *	4,081	0	0	0	0	0.0
International Paper	Greensboro Scrhq, NC *	3,766	0	0	0	0	0.0

International Paper	Berkeley, CA *	3,740	0	0	0	0	0.0
International Paper	Las Vegas P&G, NV *	3,676	0	0	0	0	0.0
International Paper	Indianapolis-P&GIN *	3,259	0	0	0	0	0.0
International Paper	Willow Grove, PA *	3,093	0	0	0	0	0.0
International Paper	Ft. Wayne, IN *	2,864	0	0	0	0	0.0
International Paper	Utica, NY *	2,710	0	0	0	0	0.0
International Paper	Houston-P&G/Glen, TX *	2,703	0	0	0	0	0.0
International Paper	Cherry Hill, NJ *	2,699	0	0	0	0	0.0
International Paper	Tallahassee, FL *	2,638	0	0	0	0	0.0
International Paper	Virginia Beach, VA *	2,537	0	0	0	0	0.0
International Paper	Centennial, CO *	2,496	0	0	0	0	0.0
International Paper	Mentor, OH *	2,461	0	0	0	0	0.0
International Paper	Ft Worth, TX *	2,417	0	0	0	0	0.0
International Paper	North Kansas City, MO *	2,290	0	0	0	0	0.0
International Paper	Greenville-lip/Faris, SC *	2,288	0	0	0	0	0.0
International Paper	West Hartford, CT *	2,232	0	0	0	0	0.0
International Paper	Miami P & G, FL *	2,213	0	0	0	0	0.0
International Paper	Clifton-P&G, NJ *	2,171	0	0	0	0	0.0
International Paper	Marietta, GA *	2,102	0	0	0	0	0.0
International Paper	Phoenix P & G, AZ *	2,050	0	0	0	0	0.0
International Paper	Addison, TX *	1,945	0	0	0	0	0.0
International Paper	Pewaukee, WI *	1,892	0	0	0	0	0.0
International Paper	Farmington Hills, MI *	1,805	0	0	0	0	0.0
International Paper	Lawrenceville, NJ *	1,789	0	0	0	0	0.0
International Paper	Dearborn, MI *	1,611	0	0	0	0	0.0
International Paper	Ft. Meyers, FL *	1,596	0	0	0	0	0.0
International Paper	Allentown, PA *	1,419	0	0	0	0	0.0
International Paper	Chatsworth, CA *	1,229	0	0	0	0	0.0
International Paper	Boulder, CO *	1,164	0	0	0	0	0.0
International Paper	Knoxville-lip/Kings, TN *	987	0	0	0	0	0.0
International Paper	Charleston-lip, SC *	831	0	0	0	0	0.0
International Paper	Columbia-lip/Main, SC *	827	0	0	0	0	0.0
International Paper	Roanoke-lip/Salem, VA *	744	0	0	0	0	0.0
International Paper	Spartanburg, SC *	744	0	0	0	0	0.0
International Paper	Bristol, VA *	718	0	0	0	0	0.0
International Paper	Mt Pleasant, SC *	670	0	0	0	0	0.0
International Paper	Huntsville, AL *	662	0	0	0	0	0.0
International Paper	Richmond West I I P, VA *	599	0	0	0	0	0.0
International Paper	Martinez, GA *	588	0	0	0	0	0.0
International Paper	Greensboro-lip/Battle, NC *	502	0	0	0	0	0.0
International Paper	Loveland, OH *	1,435,400	2	0	0	0	0.3
International Paper	Salt Lake City - X, UT *	272,629	1	0	0	0	0.7
International Paper	Denver- X, CO *	272,183	1	0	0	0	0.7
International Paper	Westampton, NJ *	201,247	1	1	0	0	1.0
International Paper	Olathe, NE *	400,637	2	1	0	0	1.0
International Paper	Hebron, KY *	371,306	2	2	0	0	1.1
International Paper	Hayward/Packaging, CA *	177,764	1	0	0	0	1.1
International Paper	Downey, CA *	517,039	3	1	0	0	1.2
International Paper	Kent, WA *	157,664	1	0	1	0	1.3
International Paper	Clifton - X, NJ *	286,194	2	2	0	0	1.4
International Paper	Phoenix - X, AZ *	141,480	1	1	0	0	1.4
International Paper	Hanover, MD *	280,798	2	1	0	0	1.4
International Paper	Harrisburg, PA *	258,526	2	0	0	0	1.5
International Paper	Glendale Heights, IL *	249,262	2	1	1	0	1.6

International Paper	Knoxville- X, TN *	103,309	1	0	1	0	1.9
International Paper	Louisville - X, KY *	96,431	1	1	0	0	2.1
International Paper	Livonia, MI *	339,937	4	1	3	0	2.4
International Paper	Pewaukee - X, WI *	167,589	2	0	1	0	2.4
International Paper	Ashland, VA *	76,726	1	0	0	0	2.6
International Paper	La Mirada, Packaging, CA *	151,980	2	0	1	0	2.6
International Paper	Charlotte-X, NC *	149,006	2	0	2	0	2.7
International Paper	Wilmington, MA *	269,661	4	1	3	0	3.0
International Paper	Tampa - X, FL *	234,614	4	0	1	0	3.4
International Paper	Grand Rapids - X, MI *	173,241	3	2	0	0	3.5
International Paper	Portland, ME *	51,503	1	0	0	0	3.9
International Paper	Pittsburgh - X, PA *	119,676	3	2	1	0	5.0
International Paper	Erie, PA *	32,326	1	0	0	0	6.2
International Paper	Columbia-X, SC *	116,243	4	1	3	0	6.9
International Paper	Little Rock - X, AR *	28,024	1	0	0	0	7.1
International Paper	Birmingham, AL *	55,121	2	0	0	0	7.3
International Paper	Arvada, CO *	10,636	1	0	0	0	18.8
International Paper	Cheektowago, NY *	8,110	1	0	0	0	24.7
International Paper	Chicago, IL *	3,024	1	0	0	0	66.1
		13,961,103	62	18	18	0	
Weighted Average for Category		*= Non-Member					0.9

Sheeting & Sheet Feeder Plants			Total OSHA Log Cases (OSHA 300 log sum of col. G+H+I+J)	LWDC (OSHA 300 log col. H)	RWDC (OSHA log col. I)	Fatalities (OSHA log col. G)	Total IR
COMPANY	CITY/Location Name	Hours					
Temple-Inland #082	Texas Sheets (San Antonio, TX)	167,013	0	0	0	0	0.00
International Paper	Hazleton,PA *	153,770	0	0	0	0	0.00
International Paper	Springhill,LA *	145,446	0	0	0	0	0.00
International Paper	Ft. Worth,TX *	133,348	0	0	0	0	0.00
International Paper	Huntsville,AL *	98,131	0	0	0	0	0.00
International Paper	Maryland Heights,MO *	97,902	0	0	0	0	0.00
Domtar	Tatum, SC	83,131	0	0	0	0	0.00
International Paper	Minneapolis,MN *	77,753	0	0	0	0	0.00
International Paper	Ontario,CA *	56,642	0	0	0	0	0.00
International Paper	Jacksonville,FL *	39,596	0	0	0	0	0.00
International Paper	Shreveport,LA *	36,248	0	0	0	0	0.00
International Paper	Kennesaw,GA *	21,026	0	0	0	0	0.00
International Paper	Edinburg,TX *	19,592	0	0	0	0	0.00
Boise White Paper	Jackson, AL	262,998	1	0	1	0	0.76
International Paper	Sumter,SC(NM)*	221,702	1	0	0	0	0.90
Temple-Inland #079	Gateway Sheets - St. Louis, MO	172,068	1	0	1	0	1.16
International Paper	Sturgis,MI **	167,931	1	0	0	0	1.19
Temple-Inland #081	Midwest Sheets	218,081	2	1	0	0	1.83
International Paper	Russellville AR *	106,777	1	0	0	0	1.87
Temple-Inland #078	Gilroy (Bay Sheets)	185,694	2	0	1	0	2.15
International Paper	Greensboro,NC *	121,327	2	0	0	0	3.30
International Paper	Dothan,AL *	55,586	1	0	0	0	3.60
International Paper	Byesville,OH *	85,911	2	0	2	0	4.66

International Paper	Stockton,CA *	70,902	2	0	2	0	5.64
International Paper	North Kansas City,MO *	96,271	3	0	1	0	6.23
International Paper	San Leandro,CA *	83,354	3	2	0	0	7.20
Weighted Average for Category	*= Non-Member						1.6
		2,811,187	22	3	8	0	

Specialty Division			Total OSHA Log	LWDC	RWDC	Fatalities	
COMPANY	CITY/Location Name	Hours	Cases (OSHA 300 log sum of col. G+H+I+J)	(OSHA 300 log col. H)	(OSHA log col. I)	(OSHA log col. G)	Total IR
Mohawk Fine Papers	Saybrook, Ashtabula, OH	283,784	0	0	0	0	0.00
Temple-Inland #157	Utica, NY	181,238	0	0	0	0	0.00
Mohawk Fine Papers	SCC, Cohoes, NY	73,244	0	0	0	0	0.00
Buckeye Lumberton	Lumberton, NC	69,429	0	0	0	0	0.00
Temple-Inland #444	Kennett Square, Toughkenamon PA	61,676	0	0	0	0	0.00
Mohawk Fine Papers	Elmira, NY	4,129	0	0	0	0	0.00
Temple-Inland #026	Graphics Resource Center, Indianapolis, IN	169,939	1	0	1	0	1.18
Green Bay Packaging	Winchester, VA	159,350	1	0	0	0	1.26
Green Bay Packaging	Green Bay, WI	548,891	8	0	6	0	2.91
Temple-Inland #292	Mack-Chicago- DEVCO	44,437	2	2	0	0	9.00
Green Bay Packaging	Slitting(Four Locations)	82,167	5	0	2	0	12.17
Weighted Average for Category	*= Non-Member						2.4
		1,394,500	17	2	9	0	

Woodlands			Total OSHA Log	LWDC	RWDC	Fatalities	
COMPANY	CITY/Location Name	Hours	Cases (OSHA 300 log sum of col. G+H+I+J)	(OSHA 300 log col. H)	(OSHA log col. I)	(OSHA log col. G)	Total IR
International Paper	Georgetown,SC *	358,364	0	0	0	0	0.00
International Paper	Prattville,AL *	137,112	0	0	0	0	0.00
International Paper	Shreveport,LA *	129,473	0	0	0	0	0.00
Temple-Inland	Forest Management	58,642	0	0	0	0	0.00
Green Bay Packaging	Fiber Resources, AR	66,971	1	1	0	0	2.99
		750,562	1	1	0	0	
Weighted Average for Category	*= Non-Member						0.3

Building Products			Total OSHA Log	LWDC	RWDC	Fatalities	Total IR
COMPANY	CITY/Location Name	Hours	Cases (OSHA 300 log sum of col. G+H+I+J)	(OSHA 300 log col. H)	(OSHA log col. I)	(OSHA log col. G)	
Temple-Inland #114/Z78	McQueeney Gypsum	116,048	0	0	0	0	0.00
Temple-Inland #128/Z35	West Memphis Gypsum	73,830	0	0	0	0	0.00
Temple-Inland #109/Z05	Fingerjointing	41,631	0	0	0	0	0.00
Temple-Inland #968/Z80	Fredericksburg Gypsum	27,607	0	0	0	0	0.00
Temple-Inland# 104/Z79	Cumberland City Gypsum	236,366	1	0	1	0	0.85
Temple-Inland #110/Z36	Fletcher Gypsum	231,225	1	0	1	0	0.86
Temple-Inland #112	Hope	221,422	1	0	0	0	0.90
Temple-Inland #108/ Z06	Diboll Fiber Products	201,983	1	0	0	0	0.99
Temple-Inland #118/Z38	Monroeville	182,791	1	0	0	0	1.09
Temple-Inland #124	Thomson	177,854	1	1	0	0	1.12
Temple-Inland #107/Z70	Del-Tin Fiber	316,283	3	2	0	0	1.90
Temple-Inland #106/Z07	Diboll Particleboard	198,793	2	1	1	0	2.01
Temple-Inland #115/Y32	Mt. Jewett MDF	244,709	3	1	0	0	2.45
Weighted Average for Category							1.3
		2,154,494	14	5	3	0	

Recycle Collection Centers			Total OSHA Log Cases (OSHA 300 log sum of col. G+H+I+J)	LWDC (OSHA 300 log col. H)	RWDC (OSHA log col. I)	Fatalities (OSHA log col. G)	Total IR
COMPANY	CITY/Location Name	Hours					
RockTenn	St. Louis	132,889	0	0	0	0	0.00
RockTenn	Oakland	125,622	0	0	0	0	0.00
International Paper	Richmond,VA*	118,564	0	0	0	0	0.00
International Paper	Omaha,NE*	96,218	0	0	0	0	0.00
International Paper	Fremont,CA*	92,015	0	0	0	0	0.00
Caraustar	Texarkana, TX	85,200	0	0	0	0	0.00
RockTenn	Columbus	84,132	0	0	0	0	0.00
RockTenn	Tampa	81,8	0	0	0	0	0.00
RockTenn	Jacksonville North	77,551	0	0	0	0	0.00
International Paper	Roseville,MN*	73,162	0	0	0	0	0.00
International Paper	Denver,CO*	71,252	0	0	0	0	0.00
Pratt Industries Recycling	Fayetteville, NC	64,353	0	0	0	0	0.00
RockTenn	Jacksonville South	60,629	0	0	0	0	0.00
Pratt Industries Recycling	Duncan, SC	60,496	0	0	0	0	0.00
International Paper	Wichita,KS*	59,628	0	0	0	0	0.00
RockTenn	St. Charles	58,658	0	0	0	0	0.00
RockTenn	Nashville	57,928	0	0	0	0	0.00
RockTenn	Orlando Taft	56,201	0	0	0	0	0.00
International Paper	Phoenix,AZ*	55,977	0	0	0	0	0.00
RockTenn	Portland	54,729	0	0	0	0	0.00
RockTenn	Sacramento East	54,141	0	0	0	0	0.00
International Paper	Itasca,IL*	51,055	0	0	0	0	0.00
International Paper	Salt Lake City,UT*	50,165	0	0	0	0	0.00
RockTenn	Louisville	48,105	0	0	0	0	0.00
Caraustar	Doraville, GA	45,600	0	0	0	0	0.00
RockTenn	Cobb County	43,070	0	0	0	0	0.00
Caraustar	Columbus	41,600	0	0	0	0	0.00
RockTenn	Augusta	40,918	0	0	0	0	0.00
International Paper	Baltimore,MD*	40,858	0	0	0	0	0.00
RockTenn	Philadelphia	39,106	0	0	0	0	0.00
International Paper	Eugene,OR*	38,801	0	0	0	0	0.00
Caraustar	Cleveland, OH	38,400	0	0	0	0	0.00
RockTenn	Orlando Sanford	37,749	0	0	0	0	0.00
International Paper	Xalapa,MX*	34,607	0	0	0	0	0.00
RockTenn	Kansas City	31,549	0	0	0	0	0.00
RockTenn	Fresno	30,162	0	0	0	0	0.00
Pratt Industries Recycling	Savannah, GA	27,811	0	0	0	0	0.00
Pratt Industries Recycling	Nashville, TN	26,369	0	0	0	0	0.00
RockTenn	Sacramento West	26,303	0	0	0	0	0.00
RockTenn	College Park	24,418	0	0	0	0	0.00
RockTenn	Anchorage	23,265	0	0	0	0	0.00
RockTenn	Southside Chicago	22,916	0	0	0	0	0.00
RockTenn	Evansville	20,104	0	0	0	0	0.00
RockTenn	Bakersfield	19,638	0	0	0	0	0.00
International Paper	Monterrey, MX, *	18,497	0	0	0	0	0.00
Pratt Industries Recycling	Columbia,SC	14,323	0	0	0	0	0.00
Pratt Industries Recycling	Denton, TX	14,186	0	0	0	0	0.00
RockTenn	Seattle	12,765	0	0	0	0	0.00
Pratt Industries Recycling	Memphis, TN	11,349	0	0	0	0	0.00

RockTenn	Gainesville	9,278	0	0	0	0	0.00
International Paper	Beaverton,OR *	112,435	1	0	0	0	1.78
RockTenn	Miami	110,127	1	0	0	0	1.82
RockTenn	Torrance	300,425	3	1	0	0	2.00
International Paper	Norwalk,CA *	90,880	1	0	0	0	2.20
RockTenn	Ft Lauderdale	70,264	1	0	0	0	2.85
RockTenn	Renton(Seattle)	131,589	2	1	0	1	3.04
RockTenn	San Jose	129,667	2	0	0	0	3.08
International Paper	West Sacramento,CA*	61,837	1	0	0	0	3.23
Pratt Industries Recycling	Shreveport, LA	60,416	1	0	0	0	3.31
International Paper	Kent,WA *	118,100	2	1	0	0	3.39
International Paper	Carrollton,TX *	56,078	1	0	0	0	3.57
Pratt Industries Recycling	East Point, GA	107,239	2	0	2	0	3.73
International Paper	Charlotte,NC *	53,568	1	0	1	0	3.73
Caraustar	Dalton, GA (incl. Chattanooga)	48,100	1	1	0	0	4.16
International Paper	Des Moines,IA *	82,503	2	0	0	0	4.85
Pratt Industries Recycling	Winston, NC	30,791	1	0	1	0	6.50
Caraustar	Hardeeville, SC	60,200	2	2	0	0	6.64
Caraustar	Charlotte, NC	44,200	2	1	0	0	9.05
International Paper	Memphis,TN *	61,706	4	0	0	0	12.96
Weighted Average for Category		*= Non-Member					1.5
		4,101,401	31	7	4	1	

Fine Paper Converting			Total OSHA Log Cases (OSHA 300 log sum of col. G+H+I+J)	LWDC (OSHA 300 log col. H)	RWDC (OSHA log col. I)	Fatalities (OSHA log col. G)	Total IR
COMPANY	CITY/Location Name	Hours					
Domtar	Indianapolis Converting, IN	189,787	0	0	0	0	0.00
Domtar	Ridgefields, TN	112,711	0	0	0	0	0.00
Domtar	Dallas/Fort Worth, TX	102,095	0	0	0	0	0.00
Domtar	Addison, IL	96,394	0	0	0	0	0.00
Domtar	Brownsville, TN	84,688	0	0	0	0	0.00
Domtar	Tatum, SC	83,131	0	0	0	0	0.00
Domtar	Dubois, PA	168,872	1	0	6	0	1.18
Domtar	Washington Court House, OH	164,457	1	1	0	0	1.22
Domtar	Owensboro, KY	139,421	1	1	0	0	1.43
Domtar	Rock Hill, SC	133,936	1	0	0	0	1.49
		1,275,492	4	2	6	0	
Weighted Average for Category							0.63

Other Paper Converting			Total OSHA Log	LWDC	RWDC	Fatalities	
COMPANY	CITY/Location Name	Hours	Cases (OSHA 300 log sum of col. G+H+I+J)	(OSHA 300 log col. H)	(OSHA log col. I)	(OSHA log col. G)	Total IR
International Paper	Visalia, CA*	530,375	0	0	0	0	0.00
International Paper	Smith Falls, OO*	310,794	0	0	0	0	0.00
International Paper	New York City, NY*	307,296	0	0	0	0	0.00
International Paper	Danville, VA*	258,955	0	0	0	0	0.00
International Paper	Louisville, KY*	257,297	0	0	0	0	0.00
International Paper	Beaverton, OR*	138,029	0	0	0	0	0.00
International Paper	Hillsboro, OR*	67,219	0	0	0	0	0.00
International Paper	Carlstadt, NJ*	59,295	0	0	0	0	0.00
International Paper	Irvine, CA*	49,610	0	0	0	0	0.00
International Paper	Aguascalientes, OO*	47,330	0	0	0	0	0.00
International Paper	Delaware, OH*	41,207	0	0	0	0	0.00
International Paper	Cypress, CA (LA Retail)*	34,231	0	0	0	0	0.00
International Paper	Bentonville, AR*	15,238	0	0	0	0	0.00
International Paper	Kenton, OH (Optihue)*	15,080	0	0	0	0	0.00
Buckeye Technologies	King, NC	9,074	0	0	0	0	0.00
International Paper	Cerritos, CA*	8,019	0	0	0	0	0.00
International Paper	Chicago, IL*	7,216	0	0	0	0	0.00
International Paper	Cincinnati, OH*	4,576	0	0	0	0	0.00
International Paper	Stone Mountain, GA*	3,823	0	0	0	0	0.00
International Paper	Springfield, OR*	2,479	0	0	0	0	0.00
International Paper	Scarborough, OO*	599,660	1	0	0	0	0.33
International Paper	Shelbyville, IL*	1,681,589	4	0	0	0	0.48
International Paper	Kenton, OH *	1,040,592	3	2	0	0	0.58
International Paper	Thorofare, NJ*	450,765	2	1	0	0	0.89
International Paper	E. Flat Rock, NC*	374,314	2	0	0	0	1.07
International Paper	Charlotte, NC*	1,092,414	6	0	3	0	1.10
International Paper	Prosperity, SC*	160,421	1	0	0	0	1.25
International Paper	Indianapolis, IN*	657,881	7	1	1	0	2.13
International Paper	Tucker, GA*	175,059	2	0	1	0	2.28
International Paper	Weaverville, NC*	173,000	2	0	0	0	2.31
International Paper	Menomonee, WI*	56,771	1	0	0	0	3.52
International Paper	Richwood, KY*	92,480	4	1	1	0	8.65
		8,722,089	35	5	6	0	
Weighted Average for Category	*= Non-Member						0.80

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Solutions For Safety And Facility Management

Proper Lockout-Tagout Procedures Result in Increased Safety, Improved Productivity, and Reduced Costs

By Chris Rutter, Product Manager, Safety and Facility ID, Brady Corporation

We've all heard stories of catastrophic injuries on the job – even fatalities. It's a tragedy for workers and their families, a disaster for friends and co-workers, and a nightmare for supervisors, managers, and business owners:

In June 2001, a worker in Marietta, Georgia was tamping down cardboard inside a compactor when his feet became caught in the cardboard. Pinned inside the machine, both of his legs were severed above the knee when the machine unexpectedly restarted.

This man's tragedy is one of many. It is estimated that 10 percent of industrial accidents are lockout/tagout related. Because of the frequency and seriousness of these accidents, OSHA seeks to improve worker safety with a special focus on lockout/tagout standards. LOTO procedures are the standard most often cited by OSHA for manufacturers, and lack of procedures or inadequately documented procedures are among the most commonly cited LOTO violations.

OSHA inspectors are specifically instructed to look for documented procedures during lockout/tagout inspections. According to STD 1-7.3 –29 CFR 1910.147, Inspection Procedures and Interpretive Guidance, OSHA inspectors are instructed to "ask the employer for documentation including procedures for the control of hazardous energy."

Why Effective LOTO Procedures Pay Off

Effective lockout/tagout procedures save lives, time and money by reducing workplace accidents, limiting downtime, and increasing the efficiency of inspection and maintenance procedures.

Studies have shown that an effective lockout/tagout program can reduce accidents by 30-50%, and some

insurance companies even offer lower premiums to companies with demonstrated, effective lockout programs.

Accidents take their toll on your company in many ways. In addition to the personal trauma to injured workers and the loss of employee morale, there are myriad hard costs, including machine repair and downtime, health-care and litigation costs, and hefty fines levied by OSHA. In the case cited above, the company was fined \$140,000, including \$70,000 for failure to use documented lockout procedures to render the compactor inoperable while the employee was in the machine's chamber. Costs for one catastrophic accident can spiral into millions of dollars.

Effective LOTO procedures can also dramatically increase your company's productivity by making lockout activities more efficient. The procedure serves as a checklist that allows workers to quickly move through the steps without confusion or mistakes, reducing downtime.

Creating Procedures that Work

Creating effective procedures is a four-step process:

- 1) Hazard analysis to determine the type and magnitude of hazardous energy associated with each piece of equipment.
- 2) Identification of steps necessary to isolate that energy and lock out the relevant control points.
- 3) Documentation of the proper steps to isolate and lock out energy.
- 4) Employee training and periodic procedure review/updates.

Brady offers an easy-to-use program, Lockout PRO™ Graphical Procedure Writing Software, that allows you quickly create a lockout procedure in as little as 3 minutes - a major time saving advantage.

Standardized templates and user-friendly prompts speed the process of creating, editing and managing procedures. For those companies that just don't have the time and resources to create their own procedures, Brady can also come on-site and create the procedures as a fully turnkey service. Either way, you end up with OSHA-compliant procedures that help prevent mistakes and increase maintenance efficiency.

Policies Vs. Procedures

General energy control rules and guidelines are often contained in a separate document called an energy control plan or policy. OSHA requires that employers document the scope and purpose of the lockout program, group lockout and shift transfer procedures, as well as procedures for the emergency removal of an absent worker's lock. Documents should also include enforcement policies that address disciplinary and other actions to be taken when procedures are not followed. Information such as policies for coordination with contractors, methods for updating procedures as well as training methods and responsibilities can also be included in the energy control policy.

In addition to the energy control policy, employers are also required to create detailed energy control procedures for each piece of machinery where workers may be exposed to hazardous energy during service or maintenance activities. More than one piece of equipment may be grouped under a single procedure only if it has 1) the same hazardous energy sources and 2) the same or similar methods for controlling that energy.

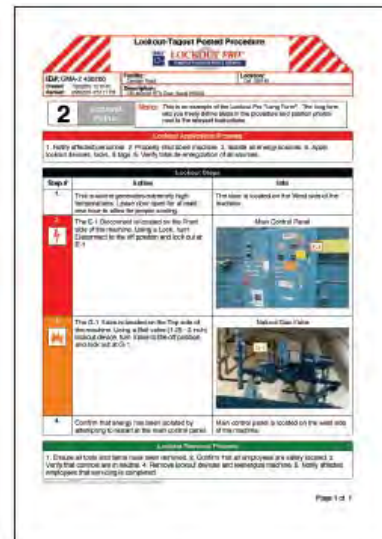
The procedures must inform workers not only WHAT to lock out but also HOW to lock it out in order to create a safe work condition. Procedures must be written in sufficient detail, clearly outlining all steps for shutting down, isolating, blocking, securing, and relieving hazardous energy. The procedure must also identify the specific steps for the placement, removal and transfer of lockout or tagout devices, as well as the specific requirements for testing the equipment to verify that it is in a zero energy state.

While OSHA requires the creation of procedures that provide detailed steps from shutdown through to re-energization, some companies also create abbreviated procedures that simply identify the energy control devices and describe how to operate and lock them out. Such abbreviated procedures typically fit on one page, making them excellent for use as placards that can be posted right at the machine. Procedures created by Brady's procedure writing service show the abbreviated form on one side and the detailed steps on the other.

Lockout PRO software also allows users to select between detailed and abbreviated procedure formats. The formats can also be modified to accommodate individual requirements.

What Makes an Effective Procedure?

The key to writing effective procedures is to make them as easy as possible to follow. Standardized formats help meet this goal by increasing comprehension, and helping ensure that procedures are followed correctly. Standard formats also help workers who are responsible for locking out multiple machines, because they can quickly scan the procedure rather than having to search for information.



Detailed and abbreviated procedures created with Brady's Lockout PRO software.

Photos and pictograms also help workers understand the nature and location of specific energy points that must be locked out on a machine. This eliminates guesswork, speeds up the lockout process, and ensures that the correct controls are locked out. Photos can be easily incorporated into your procedures using Lockout PRO, with arrows added to indicate the exact locations of energy sources. Different colors and symbols are used for the various types of hazardous energy such as electrical, pneumatic, and hydraulic.

Identifying Energy Sources

Even if you include a photo within the procedure, it may be difficult to differentiate between energy isolating devices located in the same area. Labeling or tagging the actual energy controls, such as valves, circuit breakers, and disconnect switches, helps decrease the chances of a lockout mistake. OSHA standard 1910.303 says that all electrical energy sources must be identified

for magnitude and purpose, unless located and arranged so the purpose is evident. In this standard, identifying the "purpose" means indicating the equipment serviced. The magnitude of the energy can be expressed in terms of volts for electrical, pounds-per square inch for pneumatic pressure, etc. The new American National Standard (ANSI® Z244.1-2003, Control of Hazardous Energy Lockout/Tagout and Alternative Means) expands on the OSHA Standard and requires that all energy sources be labeled or tagged.



Lockout PRO software streamlines the identification process by automatically creating labels for each energy source in the procedure. These labels can be printed to either standard inkjet or laser printers, or to one of Brady's industrial label printing systems. The creation and installation of energy source tags and labels is also included as a component of Brady's turnkey procedure service.

When You Don't Need a Written Procedure

In some cases, a written procedure is not necessary. Procedures do not need to be documented if all of the following criteria are met:

- The machine has a single energy source that completely de-energizes the equipment to be worked on.
- The machine can be locked out with a single lockout device.
- There is no potential for the machine to store or re-accumulate energy during the shutdown period.
- There are no hazards posed to other employees.
- The machine has no history of lockout/tagout accidents.

In these cases lockout is still necessary, but a formal written procedure is not.

OSHA does not currently require documented procedures for minor servicing that is routine, repetitive and integral to the production operation. But the latest version of the ANSI® LOTO Standard says, "When LOTO is not used, the alternative measures shall have procedures developed and documented." Minor servicing activities often prove to be hazardous. Therefore, while not required by OSHA, having written procedures for all equipment and processes where workers may be exposed to hazardous energy is the safest choice.

Sometimes it is impossible to have a documented procedure for every circumstance, as a procedure may vary based on the specific task being performed. In these cases, a work permit system may be the best solution. Before a worker begins a task, a safety manager can perform a hazard analysis and document the task-specific safe work procedures in the work permit. This is a "just-in-time" procedure that is created each time a job is to be done, and is best limited to situations where procedures are subject to change.

Providing Access to Procedures

Ensuring that procedures are visible and accessible is vital to the success of your lockout/tagout program. Even the best procedures are of little help if employees do not have easy access to them. The means of providing access to procedures depends on your particular circumstances and needs. The following four methods are all acceptable for providing access to lockout procedures:

- **Binders:** Binders are an easy solution for procedure storage. They can be kept in designated stations on the shop floor for easy employee access. However, binders may be cumbersome, requiring workers to search through the entire binder to find a specific procedure. Documentation may also be taken out of the binder and misplaced or not returned.
- **Posting at or on Machine:** Posting procedures at or on the machine ensures that procedures are always available. This facilitates consistent compliance by workers. However, developing a system to ensure that outdated procedures are replaced with current information is critical.
- **Online Posting:** Posting procedures online allows you to update them as often as necessary, and ensures that workers always have access to the most recent version. However, this requires computer and printer access, and the extra steps needed to log on and print procedures may restrict how often workers access them.
- **Attaching to Work Orders:** Attaching lockout procedures to work orders can be done manually or with any Computer Maintenance Management System (CMMS) that will allow you to attach digital files. When the work order is printed, the procedure prints along

with it. This gives workers access to the most up-to-date procedures without the hassle of logging onto a computer and searching the archive. However, since work orders may not be issued for all maintenance tasks, other means for accessing the procedures should also be provided.

Lockout PRO offers a wide variety of options that help make sure employees have easy, ready access to procedures. Lockout PRO procedures can be printed on plain paper (and laminated, if desired), or they can be printed on adhesive or magnetic panels for posting on or near machines using Brady's GlobalMark™ printer. With Lockout PRO, you can also create PDF files of procedures for online viewing or attaching to work orders generated on a computer maintenance management system.



Lockout PRO procedure, label and tag created using GlobalMark printer.

Procedure Training and Auditing

OSHA requires lockout training for three types of employees: authorized, affected, and "other." Authorized employees are those who perform maintenance and service work, and who undertake the actual lockout activities. They must be able to:

- Recognize hazardous energy sources.
- Understand the types and magnitudes of energy.
- Know methods for isolating and controlling hazardous energy.
- Know methods for the safe application, use and removal of lockout devices.

Authorized employees do not need to be trained on every procedure, but they need to be familiar with all the necessary techniques and skills. Authorized employees should also undergo a review each year to make sure that they understand their responsibilities under the lockout program. Affected and "other" employees do not need to be trained on specific procedures, but they do need to be familiar with the company's energy control policies, be able to recognize when lockout is in progress, and understand the importance of not tampering with the lockout or tagout devices.

The server-based version of Lockout PRO includes an online training tool that takes employees through lockout training from their own computers. This version also features an online quiz at the end of the training. When workers pass the quiz, their names are registered as having completed and passed lockout training.

Procedures need to be audited at least once per year, and inspections need to be done by an authorized person who does not normally use that procedure. The goal of the auditing process is to make sure that each procedure still provides effective employee protection. Procedures that are implemented less than once a year need to be reviewed only when used. Audits of procedures should be documented, including who, when and what equipment was reviewed.

Effective Procedures Save Time, Money And Lives

Workers and machinery are the two essential components in manufacturing, and keeping them accident-free should be a goal of any plant concerned about both safety and the company's bottom line. Having well-written, readily available lockout procedures is a critical tool for preventing lockout accidents. Good procedures are necessary for compliance, but they also prevent worker injury, avoid costly machine breakdown, and increase productivity through quicker completion of maintenance tasks.

Brady's Lockout PRO software speeds the process of creating and editing procedures. Lockout PRO procedures allow users to incorporate photos and other visual aids that help prevent mistakes and speed the lockout activity. For more information on Lockout PRO, including a guided online demo, go to www.bradyid.com/lockoutpro. For more information on Brady's procedure writing service, go to www.bradyid.com/idservices. Or call us at 1-888-272-3946 to arrange for a Brady sales person to visit your site.



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1-2010-005

Safety Alert !!

Classification: Near Miss
(Near Miss, First Aid, Recordable)

Work X

Home ☐

Dept: Maintenance

Date of Occurrence: 08/10/11

What Happened: A maintenance employee was using an impact wrench to tighten the bolts after installing a motor to the motor base. While operating the wrench, the quick connect fitting failed suddenly, causing the air hose to whip in the air next to the employee. The air to the hose was quickly turned off and no one was injured. The quick connect fitting was inspected and found to be worn causing it to fail.



- Always inspect tools before use, especially if the tool has been dropped or handled roughly. Look for damage or defects that could cause failure while the tool is in use.
- Make sure that tools are used as they were intended. Always use the proper tool for the job.
- When you identify a defect in a tool, remove it from service immediately until it can be repaired or replaced.
- Remember – the same tool that makes your job easier can cause serious injury if it is defective or is used improperly.

Corrective Action: Corrective actions included pre-use inspection of fittings and the substitution of steel fittings for brass as steel is less subject to deterioration, wear and failure from use.

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JANUARY E-NEWSLETTER

JANUARY 19, 2012

OSHA's Top 10 Citation List from 2011

Patrick Kapust, deputy director of OSHA's directorate of enforcement programs, released the list Nov. 1 on the NSC expo floor in Philadelphia. From fall protection, which garnered the highest number of violations in FY 2011, to machine guarding, these are the hazards and standards that employers may want to pay closer attention to:

- 1. Fall protection** – 7,139 violations. "Falls continue to be the leading cause of fatalities in construction," said Kapust.
- 2. Scaffolding** – 7,069 violations. In 2010, Kapust said, 37 workers died from scaffolding-related incidents.
- 3. Hazard Communication** – 6,538 violations. "Employees have the right to know and identify hazards," Kapust pointed out.
- 4. Respiratory Protection** – 3,944 violations.
- 5. Lockout/tagout** – 3,639 violations
- 6. Electrical – wiring methods** – 3,584 violations
- 7. Powered Industrial Trucks** – 3,432 violations
- 8. Ladders** – 3,244 violations.
- 9. Electrical – general requirements** – 2,863 violations. According to 2009 BLS data, 1,600 nonfatal injuries were attributed to electrical shock.
- 10. Machine guarding** – 2,728 violations. Kapust pointed out that in 2010, 90 workers were killed in machinery. In 2009, 5,930 occupational amputations were reported.

Kapust also revealed the 10 most frequently cited willful violations:

1. Excavation
2. Fall protection
3. Process safety management
4. Grain handling facilities
5. Asbestos
6. Lockout/tagout
7. Machine guarding
8. Specific excavation requirements
9. General recording criteria
10. General duty clause

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The Legal Corner

By: Charles H. Morgan



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404-881-7187

OSHA Issues Enforcement Procedures for Investigating Workplace Violence

According to the Bureau of Labor Statistics, in 2010, 18 percent of workplace fatalities were caused by assaults and violent acts. By contrast, for the same period, 14 percent of workplace fatalities were caused by falls. OSHA has recently taken steps to focus enforcement on the issue of workplace violence, with a September 8, 2011 directive detailing procedures for inspections regarding this issue. See http://www.osha.gov/OshDoc/Directive_pdf/CPL_02-01-052.pdf. This is OSHA's first directive on the topic.

OSHA has no specific standard on the issue of workplace violence, and instead cites employers for workplace violence hazards under the Occupational Safety and Health Act's General Duty Clause. To establish a violation of the General Duty Clause, OSHA must show (1) a workplace hazard exists; (2) either the employer or the employer's industry recognized the hazard; (3) the hazard is likely to cause serious injury or death; and (4) there is a feasible and useful way for the employer to abate the hazard.

- **Existence of a Workplace Hazard.** The new directive's examples of what could establish the first required element of a General Duty Clause violation—that a workplace hazard exists—include the following: (1) injury and illness records, injury reports, medical records or workers' compensation reports documenting injuries from workplace violence; (2) past complaints or grievances noting the hazard of workplace violence; and (3) meeting minutes where workplace violence issues were discussed.
- **Employer or Industry Recognition.** The directive's examples of what could establish the second element of a General Duty Clause violation—employer or industry recognition—include (1) documentation from industry groups identifying the problem of workplace violence; (2) articles and research showing the existence of workplace violence in the given industry; (3) National Institute for Occupational Safety and Health (NIOSH) and OSHA publications; (4) documentation of employee complaints on the issue; (5) employer awareness of prior similar incidents; (6) precautions taken by the employer to prevent or minimize workplace violence, including a security plan, training plan or preventative plan; and (7) employee and management interviews.
- **Likely to Cause Serious Injury or Death.** Regarding the third element—that the hazard is likely to cause serious injury or death—inspectors will look to employee interviews, injury and illness logs, and police reports for evidence that employees were threatened with physical harm or suffered serious injury or death as a result of workplace violence.
- **Feasibility of Abatement.** For the fourth element—feasibility of abatement—the directive attaches a detailed list of "Potential Abatement Methods" as examples of potentially feasible abatement methods. The measures described include hazard analyses, engineering controls, administrative controls and a written program.

Under the new directive, OSHA clarifies that an inspection generally will not be undertaken in response to coworker or personal threats of violence. Rather, the directive sets forth the two most likely scenarios triggering an OSHA inspection of workplace violence: (1) there has been a complaint, referral, fatality or catastrophic event relating to workplace violence; or (2) there is a planned programmed inspection at a worksite that is in an industry with a high incidence of workplace violence. With respect to industries with a high risk of violence, OSHA has identified those businesses in the healthcare

and social service settings, such as psychiatric facilities, hospital emergency departments, pharmacies and drug abuse treatment clinics, as well as those businesses in the late-night retail setting, such as convenience stores, liquor stores and gas stations. OSHA further identifies certain “risk factors” in these industries, such as working with unstable or volatile persons, working alone or in small numbers, working at off-peak times, working in high-crime areas, guarding valuable property, exchanging money in certain financial institutions and delivering passengers, goods or services.

Employers should continue to evaluate whether workplace violence is a potential hazard at their worksites, and consider the appropriateness and feasibility of some of the following steps to address potential hazards: a policy that communicates zero tolerance for violence and threats of violence; an avenue for the reporting of threats and concerns of violence; prompt response to any incidents of violence with documented investigation and disciplinary action when appropriate; appropriate security precautions; and appropriate emergency response procedures.

OSHA Issues PSM-Covered Chemical Facilities National Emphasis Program

OSHA recently issued a PSM-Covered Chemical Facilities National Emphasis Program (“PSM NEP”), effective November 29, 2011, which expands the 2009 pilot NEP on the subject nationwide to all OSHA Regions and State Plans. The program establishes policies and procedures for inspecting workplaces that are covered by OSHA’s process safety management (PSM) standard. See CPL 03-00-014 (November 29, 2011) (http://www.osha.gov/OshDoc/Directive_pdf/CPL_03-00-014.pdf). The inspection process outlined in the PSM NEP includes detailed questions designed to gather facts related to PSM requirements and to verify that employers’ written PSM programs have been implemented in practice. The NEP calls for focused inspections at facilities randomly selected from a list of worksites likely to have PSM covered processes. According to OSHA, the focused nature of these inspections will allow for many more inspections of PSM programs than the broad and resources-intensive program-quality verification (“PQV”) approach previously relied upon to inspect PSM compliance.

To select targets for the PSM NEP programmed inspections, OSHA will first compile a list of facilities that submitted an EPA Program 3 RMP, that are identified in the IMIS database as having been previously cited under the PSM standard, and that have NAICS codes identified as explosives manufacturing. In addition, facilities with the same NAICS code as those facilities identified in the IMIS database as having received prior PSM citations may also be added to the list despite having no prior PSM citations, if based on local knowledge OSHA deems them to be likely PSM-covered. Each Area Office is expected to conduct an average of 3 to 5 programmed inspections per year.

In addition to the programmed inspections, unprogrammed inspections under the PSM NEP will occur when a facility selected for inspection under OSHA’s Site-Specific Targeting Plan also happen to operate a PSM-covered process and when there is an inspection arising from an employee complaint, referral or accident involving a PSM issue. Complaints, referrals and accidents unrelated to PSM may still result in an inspection under this directive at the area director’s discretion.

Key aspects of the inspection process under the PSM NEP include:

- Emphasis on implementation over documentation. According to OSHA, past inspections have revealed that employers often have an extensive written PSM program but insufficient program implementation, and thus PSM NEP inspections focus on verification of PSM elements to ensure that the employer’s actual program is consistent with the written program.
- Focused inspection based on specific questions. The PSM NEP inspection relies upon specific investigation questions to review PSM compliance. These questions are compiled by OSHA in “Dynamic Lists” tailored to the nature of the PSM-covered process. For inspection integrity purposes, these lists will not be released to the public. Compliance Safety and Health Officers (“CSHOs”) conducting the inspection must evaluate compliance in the selected unit (discussed below) with each item on the applicable Dynamic List, and if during the compliance evaluation the CSHOs determine that PSM deficiencies exist outside of the selected unit or the dynamic list questions, then the inspection may be expanded after consultation with the Area Director.
- Preliminary information gathering. At each opening conference the CSHOs must first confirm that the facility is in fact covered by the PSM standard and that the process is not exempt, which will include requesting a list of the chemicals on site and their respective maximum intended inventories. Assuming the PSM standard does in fact apply, the inspection will continue and prior to the initial walkaround the facility will be required to provide a

thorough explanation and overview of the PSM program, identify personnel responsible for the PSM program and the company records used to verify compliance with the PSM standard, explain worst-case catastrophic release scenarios that might occur and what controls are in place to prevent them from happening, and provide information regarding the procedure for PPE selection and allowable electronic equipment.

- Selection of unit. During the initial walkaround the CSHOs will view those portions of the facility within the scope of the PSM standard, obtaining a basic overview of operations and gathering information to aid in the selection of the units to be inspected. The selected unit will be chosen based upon a variety of factors geared toward identifying of the most hazardous process/unit for the inspection, including the nature and quantity of chemical involved, history of incidents, the lead operator's and workers' input, the age of the process unit, maintenance activities, and compliance audit records. CSHOs may select more than one unit if they feel it is necessary to get a representative sample of the facility's covered processes.
- Required documentation. The CSHOs will request access to certain documentation during the inspection, including the following: OSHA 300 logs for employer and process related contractors for the previous three years; a list of all PSM-covered process/units in the facility; a list of the maximum intended inventories of all chemicals in each of the listed units; a summary description of the PSM program; unit process flow diagrams; piping and instrumentation diagrams; unit plot plans; unit electrical classification diagrams; process narrative descriptions; descriptions of safety systems; design codes and standards employed for process and equipment in the selected unit; a list of all workers presently involved in operating the selected units; the initial PHA and the most recent update or revalidation for the selected unit; safe upper and lower operating limits for the selected units; a list by title and unit of each PSM incident report; and all PSM incident reports for the selected unit.
- Review of inspection history and abatement. Unless a follow-up inspection has been completed since the abatement was in place, during the inspection CSHOs will review abatement for all PSM citations issued within the previous 6 years to determine whether the hazard still exists.
- Citations. The Dynamic List questions are designed to elicit a "Yes," "No" or "N/A" determination of PSM compliance, and any "No" determination will normally result in a citation. The PSM NEP notes that any violation of the PSM standard is a condition that could kill or seriously harm workers, and thus violations of the PSM standard will typically not be classified as "other-than-serious." The PSM NEP further makes clear that because the provisions of the PSM standard present closely interrelated requirements, a single issue will often implicate and warrant citations under more than one provision of the standard.

Recent Review Commission Decisions

Review Commission Affirms Willful Lead Standard Violations

In a recent decision, the Occupational Safety and Health Review Commission affirmed willful violations of the lead standard against a Baton Rouge scrap recycling company. Southern Scrap Materials Co., Inc., 23 OSH Cas. (BNA) 1596 (OSHR September 28, 2011). In Southern Scrap, after a six-month investigation, OSHA issued willful and serious citations with a total penalty proposed of \$1,937,000. At the hearing before Administrative Law Judge Welsch, certain citations were affirmed and others vacated, with the total penalty being reduced to \$266,500.

The determination of a willful violation is primarily subjective because it requires a determination of the "state of mind" of a company. Specifically, a willful violation is one that is "committed with intentional, knowing or voluntary disregard for the requirements of the Act, or with plain indifference to employee safety." See, e.g., *Secretary of Labor v. L.R. Willson and Sons, Inc.*, 1999 WL 198412, at *6 (OSHR 1999); see also *Reich v. Trinity Industries, Inc.*, 16 F.3d 1149, (11th Cir. 1994) ("The definition of 'willful' in this circuit is, in its simplest form, 'an intentional disregard of, or plain indifference to, OSHA requirements.'"). Under this standard, to be deemed willful there must be proof that either "(1) 'the employer knew of an applicable standard or provision prohibiting the conduct or condition and consciously disregarded the standard,' or (2) that, if the employer did not know of an applicable standard or provision's requirements, it exhibited such 'reckless disregard for employee safety or the requirements of the law generally that one can infer that the employer would not have cared that the conduct or conditions violated the standard.'" *J.A.M. Builders, Inc. v. Herman*, 233 F.3d 1350, 1355 (11th Cir. 2000). Thus, at the heart of a willful violation is the employer's state of mind. See *Brock v. Morello Bros. Constr.*, 809 F.2d 161, 164 (1st Cir. 1987); *Secretary v. General Motors Corp.*, 2007 WL 4350896, at *29 (OSHR 2007) ("[T]he hallmark of a willful violation is the employer's state of mind at the time of the violation.").

On appeal in Southern Scrap, the Review Commission reviewed the willfulness characterization of the alleged violations of the initial determination and training requirements of the lead standard, at 29 C.F.R. § 1910.1025(d)(2) and (l)(1)(i). While

dismissing a number of willful citations because of the lack of an employment relationship with the exposed employees, the Review Commission affirmed two willful items, basing the willful characterization on the following findings:

- The employer had been cited for the same violations five years prior to the inspection, even though those items had been withdrawn as part of a settlement agreement.
- Supervisory employees were aware of the lead standard.
- The employer “had actual knowledge” that an employee was potentially exposed to lead because it knew some of the material to be cut contained lead but had never been tested to determine the amount of lead.

The Review Commission rejected the employer’s arguments that made a good faith effort to comply with the standard, reasoning that it did not make an initial determination in the circumstance where it allegedly knew of the presence of lead, and that it allegedly moved a project on-site from a customer’s site “to avoid the cost of complying with all of the requirements of the lead standard.”

Notwithstanding the Review Commission’s finding of willfulness, the Review Commission’s ultimate findings resulted in a dramatic penalty reduction from the initially proposed penalty, down to a total penalty assessed for all violations of \$114,500.

Southern Scrap’s basis for willfulness is consistent with other decisions finding willful violations based upon factors such as (1) whether or not the employer made good faith efforts to comply with the standard at issue, (2) whether the employer had previously received citations for the same or similar hazards or had otherwise been warned of the unsafe condition, (3) whether the employer had a good faith belief that the standard did not apply, and (4) the post-violation conduct of the employer. Notwithstanding these common factors in willfulness findings, employers should remember that the willful determination is a subjective one, and OSHA can rely on many different kinds of facts and actions by the employer as a basis for willfulness.

Eye on Ergonomics

Reviewing Physical Demands MSI Risk Factors

Risk Factor #1

Excessive Force

When applying force to an object, the load on your soft tissues is greater as the weight of the load increases. Loads are magnified when held away from the middle of our bodies. Avoid lifting unreasonably heavy loads.



To minimize the risks of force and working distance . . .

- ⇒ adjust your position to get closer.
- ⇒ when bending or reaching, support the weight of your upper body.
- ⇒ tighten abdominal muscles before heavy pushing, pulling, or lifting.
- ⇒ maintain neutral joint postures.



Risk Factor #2

Awkward Posture

Awkward work postures involve non-neutral joint positions which can cause muscle imbalances and joint damage leading to injury.



To minimize the risks of work postures . . .

- ⇒ maintain neutral joint positions whenever possible.
- ⇒ change positions and rotate job tasks.
- ⇒ avoid deep squatting.
- ⇒ replace boots when you observe excessive wear and tear.



Risk Factor #3

Static Posture

Holding a muscle contraction for more than 20 seconds without turning it off will reduce blood flow, accelerate fatigue and cause discomfort.



To minimize the risks of static muscle use . . .

- ⇒ use a variety of postures and change hands or sides.
- ⇒ relax muscles regularly.
- ⇒ use neutral joint ranges.



Risk Factor #4

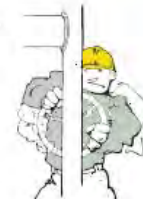
Repetition

Continuous use of the same muscles can lead to fatigue, tendinitis and muscle imbalance.



To minimize the risks of repetition . . .

- ⇒ use both sides of the body.
- ⇒ rotate job tasks.
- ⇒ minimize the other risks.



Risk Factor #5

Contact Stress

Pressing tendons or nerve tissue against sharp or hard surfaces on a regular basis can cause serious tissue damage.



To minimize the risks of contact stresses . . .

- ⇒ avoid resting wrists and forearms on sharp edges.
- ⇒ change positions frequently.
- ⇒ use protective padding when appropriate.



Summary of Each Body Part

... what to do.

Back

- ⇒ Maintain the 3-curves of the spine, do not adopt a C-curve posture.
- ⇒ After sitting, lightly warm-up before heavy work.
- ⇒ Keep loads close
- ⇒ Bend at the hips, not the lower back.



Shoulder

- ⇒ Maintain neutral joint positions by keeping the elbows close.
- ⇒ Take frequent breaks when working overhead.
- ⇒ Stretch the front of the chest and strengthen the upper back to maintain muscle balance.
- ⇒ Minimize work with arms away from the body.



Knee

- ⇒ When bending down, use the power squat technique, keeping the knees over the laces.
- ⇒ Avoid deep squatting, kneel with protective padding instead.
- ⇒ Do not jump off equipment, use the ladders to step down.



Wrist and Hand

- ⇒ Use the 'power grip' position as much as possible.
- ⇒ Avoid repetitious activities and static gripping for extended periods.
- ⇒ Take frequent micro breaks to allow blood to flow to the small muscles of the wrist and hand for recuperation.



Foot and Ankle

- ⇒ Wear proper footwear!
- ⇒ Tread should match the surface - knobby for uneven terrain and smooth for concrete, etc.
- ⇒ Ensure the arch is properly supported in the boot and that the heel fits snugly.



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

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