



## PPSA Quarterly Review

Pulp and Paper Safety Association (850) 584-3639

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

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

- Chairman's Letter
- Legal Corner
- Safety
  - OSHA Alert
  - Safety Recalls and Alerts
- Ergonomics
- About Us

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### ***A picture is worth a thousand words.....***



As we all know, a Vehicle Safe Plan of Action (SPA) is required prior to driving a car on company-related business. We believe that this is also a good practice prior to driving an automobile at any time. The following account emphasizes the importance of taking the time to do a vehicle walk-around before operating any vehicle.

A utility company began requiring its employees to do a walk-around prior to operating a company vehicle. Many of the employees resisted doing the walk-arounds for all the usual reasons (not necessary, takes too long, "I've been driving for years and never done a walk-around and nothing bad has ever happened", etc.). Nevertheless, due to recent reports of children playing around the company's work vehicles, this employee chose to do a walk-around prior to operating his work truck. This is what he found.

## A Letter from Our Chairman

### To Safety...and Beyond!

Hello PPSA members! I want to welcome you to my first communication with you as your Chairman. In the movie Toy Story, Buzz Light Year is apt to say "To infinity, and beyond!" As you notice in the title, I have tagged on to Buzz's line because I think it is important for all of us to recognize that we must continue pushing beyond our paradigms and norms to develop reliable, repeatable, sustainable safe work places.

As you know, our industry has experienced several widely known, fatal incidents...all of which were highly preventable. So, while the traditional measure of our trade, that being OSHA recordable incidents, may be trending down, we still have work to do to ensure that we keep our employees going home the same way they came to work. Our task, as safety professionals, is so absolutely critical that we must look beyond the forest and the trees as we seek what "Beyond" means. To me, Beyond is an absolutely safe work place where behaviors and conditions are positively managed resulting in incident free environments. Isn't that our job after all?

With respect to the PPSA, this coming year is an exciting year, and it can be termed as a year of significant change...hence, another definition of "Beyond!" Your Association's Board of Directors will be reviewing and making key decisions on how your Association is led. We will be reviewing potential candidates for an Executive Director role, which the PPSA has not had for a period of time.

The Executive Director will take instruction, objectives, and input from the Board, and then manage the day to day operations of the PPSA. The Executive Director will have a key role in planning and facilitating our biggest event, the annual safety conference, as well as helping improve our visibility, our membership, and our resource base. In addition, the Board believes it is absolutely critical to improve our communications and web site. It is time to take the PPSA to the next level, and we cannot do that under our current management structure. So, the Executive Director role is key to pushing the PPSA forward.

From a financial standpoint, the PPSA is on very firm footing, and this further allows us to move the Association forward.

I would like to thank Pete Masias, Safety Director with Green Bay Packaging, for his leadership and service. Pete served you well as your Chairman, and his leadership was consolidating and effective.

In addition, I would like to thank John Sunderland and the BOD for developing and facilitating our recently completed 2012 Safety Conference, held in Orlando. The conference was very good, attendance was high, and the quality of the presentations bang on. Great job by all involved! Certainly, the bar is set high for the 2012 conference, which will be held in Williamsburg, Virginia.

Last, your Board remains stable and the leadership of the Association is firm. Members of your Board of Directors include:



Monty Batchelor, Domtar  
Pete Masias, Green Bay Packaging  
Chris Redfearn, Weyerhaeuser  
John Sunderland, Buckeye Technologies  
Matt Kanneberg, RockTenn  
John Williams, International Paper  
Dan Quarles, Rite Hite Corporation  
Matt Saxe, Boise  
Shawn Powell, Brady Corporation  
Ed Corlew, Mohawk  
John Deveau, RockTenn

The Board is constantly seeking ways to improve our service to you as well as improve the safety of our collective employees. Therefore, if you have any comments, suggestions, input, or feedback for the PPSA, please do not hesitate to contact any of your Board members.

Thank you and I look forward to finding Safety...and Beyond!

Marty Barfield  
PPSA General Chair  
Domtar Paper Company



## The Legal Corner

### OSHA Injury and Illness Recordkeeping in the Aftermath of *Volks Constructors*

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In *AKM, LLC dba Volks Constructors v. Secretary of Labor*, the highly influential U.S. Court of Appeals for the D.C. Circuit rejected the longstanding position of the Occupational Safety and Health Administration (“OSHA”) and the Review Commission that OSHA injury and illness recordkeeping violations were continuing violations until they were corrected or until the five year record retention period expired. The statute of limitations in Section 9(c) of the Occupational Safety and Health Act (“OSH Act”) states that “[n]o citation may be issued . . . after the expiration of six months following the occurrence of any violation.” In the absence of any other ground for extending the statute of limitations, the court held that OSHA had six months—and no longer—from the time an employer must create an OSHA 300 injury and illness log to the time OSHA can cite an employer for failing to create that record.

OSHA did not make the alternative legal argument, presented to and relied on by the Trial Judge, that the statute of limitations should be extended by the amount of time reasonably necessary for OSHA to discover the alleged violations. Given the general understanding that it would take OSHA approximately 90 years to inspect every site subject to its authority, adoption of that type of “discovery rule” would appear to render the statute of limitations meaningless in much the same way as the continuing violations theory. However, until OSHA tests the “discovery rule” argument in the courts, it remains an open issue.

Section 1904.29(b) requires the employer to make the OSHA 300 log entries and prepare the OSHA 301 reports within seven calendar days of becoming aware of an injury or illness. In this case, OSHA alleged that Volks failed to record 102 cases and create OSHA 301 reports for 67 cases over a period of four years. But OSHA issued the citations for these items to Volks more than six months after the deadlines for creating those records. Section 1904.32 requires the employer to review the OSHA 300 log at the end of each calendar year to verify that entries are complete and accurate, correct any deficiencies identified during the review, certify the summary, and post the summary from February 1 through April 30 of the following year. While Section 1904.32 does not specify a date when the year-end review must be completed, it would have to be finished by February 1 of the following year so that the employer could comply with the requirement to certify and post the summary by that date. OSHA issued the citations of this section to Volks more than six months after the deadlines for creating those records.

Based on the language of Section 9(c) of the OSH Act, Volks asserted that the statute of limitations had expired for all of the cited items and filed a motion to dismiss the citations. The Review Commission rejected Volks’ argument based on the precedents established in prior Review Commission cases holding that a missing or inaccurate entry on an OSHA 300 Log is a continuing violation of the OSH Act until it is corrected or until the five-year record retention period expires. On appeal, the D.C. Circuit reversed the decision of the Review Commission, holding that the prior decisions of the Review Commission had misinterpreted the law and that the statute of limitations had expired with respect to all of the cited items.

Volks maintained that OSHA could not cite it for failing to prepare 301 Reports for cases it had not entered on the OSHA 300 Log because the OSHA rule requires an employer to prepare a Report only “for each recordable injury or illness *entered on the OSHA 300 Log*.” (Emphasis added.) Since Volks did not make any entries in the OSHA 300 Log for those injuries/illnesses, it maintained that it was not obligated to create a 301

Report for those unrecorded cases. The Review Commission rescued OSHA from its drafting error and rejected that argument as being contrary to the overall structure, language, purpose, and history of the regulation.

Volks further argued that the requirement to “review the OSHA 300 Log to verify that the entries are complete and accurate, and correct any deficiencies identified” did not apply to omitted recordable cases. The Review Commission also rejected that argument. It stated that the interpretation suggested by Volks might be appropriate if the provision required verification that *each* entry *is* complete, but the use of the plural in the rule’s phrase “entries are complete” signals a duty to check both for missing and incomplete entries. In addition, the Review Commission held that the obligation to “correct any deficiencies ... clearly encompasses a missing entry.”

OSHA rewrote the OSHA Injury and Illness Recordkeeping Rule (Part 1904) in 2001. The prior rule had been interpreted to require employers to correct any errors or omissions in the Part 1904 records during the required three-year retention period. In what the regulated community viewed as a trade-off, the 2001 rule dropped that requirement and extended the retention period to five years. However, through the application of the continuing violation theory, OSHA managed to have its cake and eat it too, at least until the D.C. Circuit issued its decision in *Volks*.

Looking prospectively, employers should remain just as diligent in their efforts to comply with the requirements of Part 1904. The *Volks* decision should not be viewed as an opportunity to become lax, but rather as establishing a legal defense employers should use when, despite diligent efforts, an employer allegedly comes up short in trying to comply with a complex and often hyper-technical regulatory scheme. Although the court appears to have eliminated the continuing violation theory (subject to the seemingly unlikely possibility that another federal appellate court will taking a different view), the current rule remains a trap for the employer that fails to give it the attention and respect it deserves.

Beyond its complexity, Part 1904 requires the employer to add entries for belatedly discovered cases and update recorded cases to reflect new information during the five-year retention period. The expiration of the statute of limitations for those obligations can go well beyond six months and eight days after the onset of the recordable injury or illness.

The Review Commission interpreted the annual obligation to review the accuracy of the OSHA 300 Log to include adding missing cases. While that provision does not extend the statute of limitations for citing missing or erroneous entries in individual cases, it does provide OSHA with an extended time frame for enforcement action. Furthermore, although the statute of limitations may have run on individual cases, nothing precludes OSHA from introducing them into evidence to show a pattern of conduct that would support a willful citation for cases on which the statute of limitations has not run. Finally, for a large, multi-site employer, evidence of an indifferent attitude towards Part 1904 recordkeeping could lead to a nightmare of enforcement actions and could provide OSHA with the political ammunition it would need to amend Part 1904 and advance a number of other unnecessary and overly burdensome initiatives.



## Safety Stats

Paper Mills #1- 2 million and over 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					
International Paper	Courtland, AL *	1,251,595	5	0	1	0	0.80
Longview Fibre Paper& Pkg	Longview, WA	1,165,380	5	2	2	0	0.86
Domtar	Ashdown	1,041,260	7	5	0	0	1.34
Glatfelter	Ohio Operation, Chillicothe, OH	1,458,811	17	4	6	0	2.33
Glatfelter	Spring Grove, PA	1,170,689	15	4	6	0	2.56
Meadwestvaco	Covington, VA	1,224,892	23	6	0	0	3.76
Weighted Average for Category							2.0
*= Non-Member		7,312,627	72	21	15	0	

Paper Mills #2- between 1 & 2 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					
International Paper	Ticonderoga, NY *	678,880	0	0	0	0	0.00
Graphic Pkg International	West Monroe, LA	966,575	1	1	0	0	0.21
International Paper	Selma, AL *	848,906	1	0	0	0	0.24
Resolute Forest Products	Calhoun, TN	713,818	1	1	0	0	0.28
International Paper	Eastover, SC *	680,079	1	0	1	0	0.29
Boise White Paper	Jackson, AL	499,940	1	0	1	0	0.40
Domtar	Windsor, Quebec	765,192	2	2	0	0	0.52
Weyerhaeuser	Longview, WA	572,208	2	0	0	0	0.70
Graphic Pkg International	Macon, GA	559,916	2	1	1	0	0.71
RockTenn	Hodge, LA	550,821	2	0	2	0	0.73
RockTenn	Panama City, FL	517,177	2	0	0	0	0.77
International Paper	Georgetown, SC *	748,543	3	0	0	0	0.80
International Paper	Mansfield, LA *	741,363	4	1	0	0	1.08
International Paper	Augusta, GA *	900,410	5	0	0	0	1.11
International Paper	Prattville, AL *	707,805	4	0	3	0	1.13
International Paper	Savannah, GA *	704,208	4	0	0	0	1.14
International Paper	Rome, GA	500,297	3	0	3	0	1.20
Meadwestvaco	Cottonton, AL- Mahrt Mill	833,079	6	2	0	0	1.44
Meadwestvaco	Evadale, TX	794,234	6	2	0	0	1.51
International Paper	Cantonment, FL *	522,166	4	2	1	0	1.53
International Paper	Riegelwood, NC *	861,793	7	2	2	0	1.62
Finch Paper LLC.	Glen Falls, NY	871,316	8	1	0	0	1.84
International Paper	Texarkana, TX *	834,696	8	0	2	0	1.92
RockTenn	Demopolis, AL	518,905	5	1	3	0	1.93
Kapstone Charleston Kraft LLC	North Charleston, SC	766,197	9	2	2	0	2.35
RockTenn	West Point, VA	576,196	7	1	2	0	2.43
AbitibiBowater	Catawba, SC	808,335	10	5	5	0	2.47
RockTenn	Fernandina, FL	542,507	7	1	3	0	2.58
Thilmany Papers	Kaukauna	683,436	15	3	7	0	4.39
RockTenn	Florence, SC	498,865	19	2	3	0	7.62
Weighted Average for Category							1.4
*= Non-Member		20,767,862	149	30	41	0	

Paper Mills #3-less than 1 million hours worked			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
Boise	DeRidder, La	487,248	0	0	0	0	0.00
International Paper	Pine Hill,AL *	434,608	0	0	0	0	0.00
International Paper	Springfield,OR *	282,090	0	0	0	0	0.00
International Paper	Franklin,VA *	279,008	0	0	0	0	0.00
Domtar	Hawesville, KY	227,775	0	0	0	0	0.00
International Paper	New Johnsonville, WaverlyTN	195,314	0	0	0	0	0.00
Mohawk Fine Papers	Waterford Mill, Waterford, NY	158,684	0	0	0	0	0.00
Buckeye Mt. Holly	Mt. Holly, NC	121,825	0	0	0	0	0.00
International Paper	Maysville, KY	119,869	0	0	0	0	0.00
International Paper	Ontario, CA	102,195	0	0	0	0	0.00
RockTenn	Matane, QBE	17,390	0	0	0	0	0.00
International Paper	Pineville,LA *	1,327	0	0	0	0	0.00
RockTenn	La Tuque, QBE	462,159	1	0	0	0	0.43
RockTenn	Stevenson, AL	437,260	1	0	1	0	0.46
RockTenn	Hopewell,VA	298,105	1	1	0	0	0.67
Mohawk Fine Papers	Cohoes Mill, NY	266,076	1	0	1	0	0.75
Weyerhaeuser	Norpac, Longview, WA	493,539	2	1	0	0	0.81
International Paper	Bogalusa, LA	491,602	2	0	1	0	0.81
Domtar	Rothschild, WI	435,553	2	1	0	0	0.92
International Paper	Orange,TX	411,833	2	0	1	0	0.97
Domtar	Kingsport, TN	186,060	1	1	0	0	1.07
International Paper	Cayuga, IN (Newport)	149,099	1	0	0	0	1.34
Domtar	Johnsonburg, PA	385,009	3	0	0	0	1.56
Domtar	Nekoosa, WI	463,922	4	2	0	0	1.72
RockTenn	Coshocton, OH	228,402	2	2	0	0	1.75
International Paper	Valliant,OK *	336,579	3	0	2	0	1.78
International Paper	Redwood,MS *	336,057	3	0	0	0	1.79
International Paper	Red River Mill, Campti,LA	417,688	4	0	3	0	1.92
Interstate Paper	Riceboro, GA	264,680	3	1	0	0	2.27
Domtar	Marlboro, Bennettsville, SC	348,413	4	2	1	0	2.30
Domtar	Port Huron, MI	258,391	3	2	0	0	2.32
Packaging Corp. of America	Tomahawk, WI	443,775	6	2	1	0	2.70
Orchids Paper Products	Pryor, OK	305,607	5	21	0	2	3.27
New Page	Stevens Point, WI	330,874	6	3	1	0	3.63
Graphic Pkg International	Pine Bluff, AK	195,667	4	1	0	0	4.09
UPM Madison (Madison Paper)	Madison, Maine	238,396	6	3	0	0	5.03
FutureMark Paper Company	Alsip	185,062	5	5	0	0	5.40
Green Bay Packaging	Arkansas Kraft, AR	407,324	13	1	5	0	6.38
Weighted Average for Category		*= Non-Member					1.6
		11,204,464	88	49	17	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
RockTenn	Syracuse, NY	294,637	0	0	0	0	0.00
International Paper	Oxnard, CA *	114,741	0	0	0	0	0.00
FibreK	Menominee, MI(Menominee Mill)	103,665	0	0	0	0	0.00
RockTenn	Uncasville, CT	95,283	0	0	0	0	0.00
International Paper	Henderson, KY *	91,224	0	0	0	0	0.00
RockTenn	Aurora, IL	86,676	0	0	0	0	0.00
Sonoco	Holyoke, MA	68,193	0	0	0	0	0.00
Sonoco	DePere, WI	64,354	0	0	0	0	0.00
Sonoco	Sumner, WA	60,425	0	0	0	0	0.00
RockTenn	St. Paul Mill Complex, MN	320,260	1	0	0	0	0.62
International Paper	Cedar Rapids, IA *	242,400	1	0	1	0	0.83
SP Newsprint Co., LLC	Dublin, Ga	334,766	2	2	0	0	1.19
Graphic Pkg International	Middletown, OH	165,435	1	0	0	0	1.21
RockTenn	Sheldon Springs, VT	162,462	1	0	0	0	1.23
RockTenn	Dallas, TX	142,203	1	1	0	0	1.41
Graphic Pkg International	Santa Clara, CA	138,104	1	0	1	0	1.45
Sonoco	Menasha, WI	130,679	1	0	0	0	1.53
Sonoco	Hutchinson, KS	120,068	1	1	0	0	1.67
Graphic Pkg International	Kalamazoo, MI	342,925	3	2	0	0	1.75
Sonoco	Newport, TN	113,431	1	1	0	0	1.76
Sonoco	Richmond, VA	107,667	1	0	0	0	1.86
RockTenn	Delaware Water Gap, PA	100,745	1	0	1	0	1.99
RockTenn	Chattanooga, TN	182,680	2	1	1	0	2.19
RockTenn	Seminole Mill, Jacksonville, FL	179,825	2	1	0	0	2.22
RockTenn	Jacksonville, FL	173,474	2	1	0	0	2.31
Hartford City Paper	Hartford City, IN	86,733	1	0	1	0	2.31
International Paper	Xalapa *	158,556	2	0	1	0	2.52
RockTenn	Eaton, IN	65,106	1	0	1	0	3.07
RockTenn	Battle Creek, MI	188,085	3	1	0	0	3.19
Graphic Pkg International	Battle Creek, MI	239,673	4	2	0	0	3.34
Sonoco	City Of Industry, CA	54,090	1	0	0	0	3.70
Graphic Pkg International	Pekin, IL	50,709	1	1	0	0	3.94
Green Bay Packaging	Green Bay, WI	150,582	3	0	2	0	3.98
Weyerhaeuser	Columbus Modified Fiber, MS	121,162	3	1	0	0	4.95
RockTenn	Cincinnati, OH	71,934	2	1	1	0	5.56
FibreK	Menominee, MI(Fairmont Mill)	96,541	3	0	1	0	6.21
Sonoco	Hartsville, SC	610,529	19	1	1	0	6.22
Fusion Paperboard	Versailles, CT	149,771	5	2	1	0	6.68
<b>Weighted Average for Category</b>	*= Non-Member						<b>2.3</b>
		<b>5,979,793</b>	<b>70</b>	<b>19</b>	<b>13</b>	<b>0</b>	



Pulpmills			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					
Weyerhaeuser	Columbus, MS	376,197	0	0	0	0	0.00
Weyerhaeuser	Flint River, GA	276,791	0	0	0	0	0.00
Domtar	Dryden, Ont.	364,971	1	1	0	0	0.55
Domtar	Hawesville, KY	249,630	1	0	0	0	0.80
Rayonier	Jesup, GA	931,219	4	1	2	0	0.86
Cosmo Specialty Fibers	Cosmopolis, WA	171,887	1	1	0	0	1.16
Weyerhaeuser	New Bern, NC	294,478	2	0	0	0	1.36
Weyerhaeuser	Port Wentworth, WA	291,269	2	0	0	0	1.37
Weyerhaeuser	Grand Prairie, AB	268,888	2	0	0	0	1.49
Domtar	Plymouth, NC	483,007	4	3	1	0	1.66
Rayonier	Fernandina Beach	330,242	3	1	0	0	1.82
Domtar	Espanola, Ontario	539,293	5	1	2	0	1.85
Domtar	Kamloops, BC	424,106	4	2	0	0	1.89
Buckeye Technologies	Memphis, TN	150,898	3	2	1	0	3.98
Buckeye Florida	Perry, FL	702,001	14	3	0	0	3.99
Weighted Average for Category							1.6
		5,854,877	46	15	6	0	

Box Plants - with corrugator			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	Guanajuato, MX(San Jose)*	337,222	0	0	0	0	0.00
RockTenn	Guadalupe, NL	333,869	0	0	0	0	0.00
International Paper	Los Mochis, Sinaloa*	320,871	0	0	0	0	0.00
RockTenn	Queretaro, QR	319,327	0	0	0	0	0.00
RockTenn	Adams, WI	255,749	0	0	0	0	0.00
RockTenn	Chicago, IL	193,679	0	0	0	0	0.00
International Paper	Silao, MX*	188,873	0	0	0	0	0.00
Longview Fibre Paper & Pkg	Spanish Fork, UT	183,938	0	0	0	0	0.00
International Paper	Biglerville, PA*	181,950	0	0	0	0	0.00
RockTenn	New Lenox, IL	177,936	0	0	0	0	0.00
International Paper	Orlando, FL	165,436	0	0	0	0	0.00
International Paper	Mt Carmel, PA*	161,453	0	0	0	0	0.00
International Paper	Barrington, NJ *	157,825	0	0	0	0	0.00
RockTenn	Germantown, WI	154,079	0	0	0	0	0.00
RockTenn	Fort Worth, TX	153,729	0	0	0	0	0.00
International Paper	Tampa, FL	153,109	0	0	0	0	0.00
RockTenn	Lancaster, PA	152,486	0	0	0	0	0.00
RockTenn	Milton, ON	151,092	0	0	0	0	0.00
International Paper	Conway, AR*	150,290	0	0	0	0	0.00
Longview Fibre Paper & Pkg	Yakima, WA	147,729	0	0	0	0	0.00
International Paper	Russellville, AR *	144,570	0	0	0	0	0.00
RockTenn	Humboldt, TN	141,700	0	0	0	0	0.00

International Paper	Murfreesboro, TN *	141,166	0	0	0	0	0.00
International Paper	Modesto Riverside, CA*	140,375	0	0	0	0	0.00
International Paper	Grand Prairie, TX *	137,319	0	0	0	0	0.00
International Paper	Bay Minette, AL*	135,286	0	0	0	0	0.00
International Paper	Cedar Rapids, IA*	134,720	0	0	0	0	0.00
International Paper	San Antonio, TX (Pop Gunn)*	134,266	0	0	0	0	0.00
RockTenn	Richmond, VA	133,886	0	0	0	0	0.00
RockTenn	Baltimore, MD	132,328	0	0	0	0	0.00
RockTenn	Rogers, AR	131,363	0	0	0	0	0.00
International Paper	Jackson, MS*	130,480	0	0	0	0	0.00
International Paper	Yuma, AZ*	130,332	0	0	0	0	0.00
RockTenn	Sioux City, IA(North)	129,537	0	0	0	0	0.00
International Paper	Conklin, NY (Binghamton)	127,177	0	0	0	0	0.00
RockTenn	Toronto, ON	126,778	0	0	0	0	0.00
International Paper	Manson, NC (Warren)*	126,277	0	0	0	0	0.00
RockTenn	Glendale, AZ	126,246	0	0	0	0	0.00
RockTenn	Springfield, MO	126,014	0	0	0	0	0.00
International Paper	White Bear Lake, MN*	124,822	0	0	0	0	0.00
International Paper	Beaverton, OR *	124,355	0	0	0	0	0.00
RockTenn	Bradenton, FL	124,325	0	0	0	0	0.00
RockTenn	Mishawaka, IN	124,115	0	0	0	0	0.00
International Paper	McAllen, TX*	123,544	0	0	0	0	0.00
International Paper	Elk Grove, CA*	121,150	0	0	0	0	0.00
RockTenn	Winnipeg, MB	120,644	0	0	0	0	0.00
RockTenn	Grand Prairie, TX	116,098	0	0	0	0	0.00
International Paper	Arden Hills, MN*	114,348	0	0	0	0	0.00
RockTenn	Sioux Falls, SD	113,894	0	0	0	0	0.00
Green Bay Packaging	Ft. Worth, TX	113,399	0	0	0	0	0.00
RockTenn	Calgary, AB	112,880	0	0	0	0	0.00
International Paper	Lexington, KY	112,812	0	0	0	0	0.00
International Paper	Mt. Vernon, OH*	111,979	0	0	0	0	0.00
International Paper	Monterrey, MX*	111,945	0	0	0	0	0.00
International Paper	Gilroy, CA	109,770	0	0	0	0	0.00
RockTenn	Wakefield, MA	109,241	0	0	0	0	0.00
International Paper	Streetsboro, OH	108,689	0	0	0	0	0.00
International Paper	Sealy, TX*	108,258	0	0	0	0	0.00
International Paper	Carrollton, TX (Dallas)	108,154	0	0	0	0	0.00
International Paper	Hazleton, PA*	107,254	0	0	0	0	0.00
International Paper	Modesto (East),CA*	106,986	0	0	0	0	0.00
RockTenn	Galesburg, IL	105,257	0	0	0	0	0.00
International Paper	Newton, NC*	104,206	0	0	0	0	0.00
RockTenn	Blue Springs, MO	103,858	0	0	0	0	0.00
Green Bay Packaging	Tulsa, OK	102,884	0	0	0	0	0.00
International Paper	Rochester, NY*	101,516	0	0	0	0	0.00
International Paper	Putnam, CT*	101,424	0	0	0	0	0.00
International Paper	Statesville, NC*	101,417	0	0	0	0	0.00
RockTenn	Sioux City, IA(South)	101,315	0	0	0	0	0.00
International Paper	Fort Wayne, IN*	100,684	0	0	0	0	0.00
International Paper	Carson, GA*	100,285	0	0	0	0	0.00
International Paper	Amarillo, TX*	98,956	0	0	0	0	0.00
RockTenn	Fargo, ND	98,568	0	0	0	0	0.00
International Paper	Lake Wales, FL*	97,337	0	0	0	0	0.00
International Paper	Shakopee, MN	97,330	0	0	0	0	0.00

RockTenn	Mansfield, MA	92,785	0	0	0	0	0.00
International Paper	Golden, CO*	89,188	0	0	0	0	0.00
RockTenn	Ville ST Laurent, QC	87,542	0	0	0	0	0.00
RockTenn	Knoxville, TN	87,394	0	0	0	0	0.00
RockTenn	New Westminster, BC	86,142	0	0	0	0	0.00
International Paper	Plant City, FL *	84,528	0	0	0	0	0.00
International Paper	Oklahoma City, OK*	83,714	0	0	0	0	0.00
Longview Fibre Paper & Packaging	Longview, WA	80,746	0	0	0	0	0.00
Green Bay Packaging	DePere, WI	79,415	0	0	0	0	0.00
International Paper	Magnolia, MS*	79,275	0	0	0	0	0.00
International Paper	Garden City, KS	79,060	0	0	0	0	0.00
International Paper	Petersburg, VA*	78,736	0	0	0	0	0.00
International Paper	Guadalajara, MX(Zapopan)*	77,850	0	0	0	0	0.00
RockTenn	Tyler, TX	71,371	0	0	0	0	0.00
International Paper	Lancaster, PA*	64,322	0	0	0	0	0.00
International Paper	Minden, LA	64,077	0	0	0	0	0.00
International Paper	Waterloo, IA*	61,841	0	0	0	0	0.00
International Paper	Santa Paula, CA*	61,589	0	0	0	0	0.00
International Paper	Indianapolis Spacekraft, IN*	60,921	0	0	0	0	0.00
RockTenn	Muskogee, OK	56,518	0	0	0	0	0.00
RockTenn	Shelby, NC	52,888	0	0	0	0	0.00
International Paper	Elgin, IL	28,983	0	0	0	0	0.00
International Paper	Salem, OR*	27,331	0	0	0	0	0.00
RockTenn	Washington Court, OH	26,686	0	0	0	0	0.00
International Paper	Bedford Park, IL (South) *	26,358	0	0	0	0	0.00
International Paper	Chihuahua, MX*	23,717	0	0	0	0	0.00
International Paper	Hidalgo, TX*	12,508	0	0	0	0	0.00
International Paper	Hammond, IN*	9,182	0	0	0	0	0.00
International Paper	Hanford, CA*	7,041	0	0	0	0	0.00
International Paper	Bellevue, WA*	2,821	0	0	0	0	0.00
International Paper	Vernon, CA*	1,239	0	0	0	0	0.00
International Paper	Hartford City, IN*	79	0	0	0	0	0.00
International Paper	La Colmena, MX*	383,531	1	0	0	0	0.52
International Paper	Ixtac, MX*	263,425	1	0	0	0	0.76
International Paper	Monterrey, Santa Catarina*	234,144	1	0	1	0	0.85
International Paper	Tracy, CA	200,376	1	0	0	0	1.00
International Paper	Santa Fe Springs, CA (Crockett)	186,087	1	0	1	0	1.07
RockTenn	Cerritos, CA	182,652	1	0	0	0	1.09
International Paper	Juarez, MX*	181,165	1	1	0	0	1.10
International Paper	Lexington, SC*	180,603	1	0	0	0	1.11
RockTenn	Saltillo, MS	175,604	1	0	1	0	1.14
RockTenn	Aston, PA	169,995	1	0	1	0	1.18
RockTenn	Fresno, CA	167,059	1	0	1	0	1.20
RockTenn	Latta, SC	159,370	1	0	1	0	1.25
RockTenn	Norcross, GA	159,329	1	0	0	0	1.26
RockTenn	Winston-Salem, NC	159,008	1	0	0	0	1.26
RockTenn	El Paso, TX (East)	158,931	1	0	1	0	1.26
International Paper	Laurens, SC *	156,492	1	0	0	0	1.28
International Paper	Aurora, (Fox Valley)IL*	155,826	1	0	0	0	1.28

International Paper	Anaheim, CA *	155,506	1	0	1	0	1.29
RockTenn	Minneapolis, MN	146,875	1	0	1	0	1.36
International Paper	Decatur, AL*	144,531	1	0	0	0	1.38
International Paper	St. Joseph, MO*	143,204	1	0	0	0	1.40
International Paper	Springhill, LA*	140,491	1	0	1	0	1.42
International Paper	Sanger, CA *	140,005	1	0	1	0	1.43
RockTenn	Ravenna, OH	138,305	1	1	0	0	1.45
RockTenn	Chesterfield, MO	137,152	1	0	1	0	1.46
International Paper	Bedford Park, IL (North)*	136,987	1	0	0	0	1.46
RockTenn	North Tonawanda, NY	136,253	1	0	1	0	1.47
International Paper	Delaware, OH*	135,089	1	0	0	0	1.48
International Paper	Lynchburg, VA*	134,587	1	0	0	0	1.49
International Paper	Wooster, OH*	133,896	1	0	0	0	1.49
RockTenn	Deer Park, NY	133,755	1	1	0	0	1.50
International Paper	Lafayette, LA*	133,705	1	0	0	0	1.50
RockTenn	Chattanooga, TN	133,352	1	1	0	0	1.50
International Paper	Auburn, ME*	133,010	1	0	1	0	1.50
Longview Fibre Paper & Pkg	Twin Falls, ID	132,330	1	0	0	0	1.51
International Paper	Salinas, CA *	129,694	1	0	1	0	1.54
RockTenn	Covington, GA	128,866	1	0	0	0	1.55
International Paper	Georgetown, SC*	128,540	1	0	0	0	1.56
International Paper	Omaha, NE*	127,307	1	0	0	0	1.57
International Paper	Spotswood, NJ	125,637	1	0	1	0	1.59
RockTenn	Guaynabo, PR	125,019	1	0	0	0	1.60
RockTenn	Corona, CA	124,658	1	0	0	0	1.60
RockTenn	Fernandina Beach, FL	123,711	1	0	1	0	1.62
RockTenn	St. Cloud, MN	123,541	1	0	0	0	1.62
International Paper	Olympia, WA *	122,917	1	0	0	0	1.63
RockTenn	Portland, OR	122,096	1	0	0	0	1.64
RockTenn	Burlington, ON	120,848	1	0	0	0	1.65
International Paper	Austin, MN*	119,032	1	0	0	0	1.68
RockTenn	Montgomery, AL	118,881	1	0	0	0	1.68
International Paper	Portland, OR*	115,565	1	1	0	0	1.73
RockTenn	Lewisburg, TN	115,432	1	0	0	0	1.73
International Paper	Belleville, IL*	113,674	1	0	0	0	1.76
International Paper	El Morro(Vega Alta),OO*	113,307	1	0	1	0	1.77
International Paper	Des Plaines, IL*	113,272	1	0	0	0	1.77
Green Bay Packaging	Fremont, OH	111,500	1	0	1	0	1.79
International Paper	Camarillo, CA *	109,312	1	0	1	0	1.83
International Paper	Compton, CA*	108,458	1	0	0	0	1.84
International Paper	Fond Du Lac, WI*	105,526	1	0	0	0	1.90
International Paper	Eaton, OH*	105,152	1	0	0	0	1.90
Longview Fibre Paper & Pkg	Oakland, CA	104,580	1	1	1	0	1.91
International Paper	Indianapolis, IN	104,174	1	0	0	0	1.92
International Paper	Lumberton, NC*	103,048	1	0	0	0	1.94
International Paper	Charlotte, NC*	101,249	1	0	0	0	1.98
International Paper	Buena Park, CA*	100,873	1	0	0	0	1.98
Green Bay Packaging	Cincinnati, OH	99,720	1	0	1	0	2.01
International Paper	Fort Smith (North), AR	99,200	1	0	0	0	2.02
International Paper	Middletown, OH*	98,018	1	0	0	0	2.04
International Paper	Bowling Green, KY*	194,587	2	1	0	0	2.06
International Paper	Eighty Four, PA*	97,252	1	0	0	0	2.06
International Paper	Santa Fe Springs, CA	97,228	1	0	0	0	2.06

International Paper	Aurora, IL *	95,927	1	0	0	0	2.08
International Paper	Savannah, GA*	94,717	1	0	0	0	2.11
International Paper	Kansas City, KS	94,485	1	0	0	0	2.12
International Paper	Carrollton, TX*	93,645	1	1	0	0	2.14
International Paper	St. Louis, MO (Fenton)	87,438	1	0	1	0	2.29
International Paper	Kalamazoo, MI*	87,090	1	1	0	0	2.30
RockTenn	Winston-Salem, NC (Manufacturing)	342,373	4	1	1	0	2.34
RockTenn	Lithonia, GA	84,119	1	0	1	0	2.38
International Paper	Forest Park, GA *	79,877	1	0	0	0	2.50
International Paper	Lithonia, GA*	158,740	2	0	1	0	2.52
RockTenn	Milwaukee, WI	78,222	1	0	1	0	2.56
International Paper	Ontario, CA	78,084	1	0	0	0	2.56
International Paper	Columbus, GA*	74,139	1	0	0	0	2.70
RockTenn	Milpitas, CA	147,782	2	0	2	0	2.71
International Paper	Bellmawr, NJ*	73,670	1	0	0	0	2.71
International Paper	Chicago, IL *	73,205	1	0	0	0	2.73
Longview Fibre Paper & Pkg	Seattle, WA	72,986	1	0	0	0	2.74
International Paper	Fort Smith (South), AR	143,789	2	2	0	0	2.78
International Paper	Solon, OH*	71,759	1	0	0	0	2.79
RockTenn	Salinas, CA	140,587	2	0	2	0	2.85
RockTenn	Guelph, ON	138,821	2	0	1	0	2.88
RockTenn	Camillus, NY	138,768	2	1	0	0	2.88
International Paper	Edinburg, TX (East)*	138,434	2	0	1	0	2.89
RockTenn	Cincinnati, OH	207,493	3	1	2	0	2.89
International Paper	Montgomery, IL*	136,414	2	0	0	0	2.93
RockTenn	Liberty, MO	135,562	2	0	1	0	2.95
RockTenn	Tullahoma, TN	66,926	1	1	0	0	2.99
RockTenn	Mooresville, NC	133,603	2	0	0	0	2.99
International Paper	Morristown, TN*	132,570	2	0	0	0	3.02
International Paper	Three Rivers, MI*	131,910	2	1	0	0	3.03
RockTenn	Newark, NJ	131,653	2	1	0	0	3.04
RockTenn	Denver, CO	65,439	1	0	1	0	3.06
RockTenn	Columbus, IN	130,792	2	1	1	0	3.06
International Paper	Rockford, IL*	127,398	2	0	0	0	3.14
Green Bay Packaging	El Paso, TX	126,822	2	0	2	0	3.15
International Paper	Butler, IN *	122,299	2	0	0	0	3.27
RockTenn	Dayton, NJ	118,594	2	0	1	0	3.37
International Paper	San Antonio, TX (ATT Center)	115,894	2	0	1	0	3.45
RockTenn	Regina, SK	57,881	1	1	0	0	3.46
International Paper	Union Gap, WA (Yakima) *	115,253	2	2	0	0	3.47
International Paper	Griffin, GA*	115,220	2	0	0	0	3.47
International Paper	Richmond, VA*	112,748	2	0	0	0	3.55
International Paper	Edinburg, TX*	111,473	2	0	1	0	3.59
International Paper	Wheat Ridge, CO	111,457	2	1	0	0	3.59
RockTenn	Murfreesboro, TN	105,523	2	0	0	0	3.79
Green Bay Packaging	Baltimore, MD	103,421	2	0	2	0	3.87
International Paper	Northlake, IL *	102,225	2	0	0	0	3.91
International Paper	Cleveland, TN *	102,174	2	0	0	0	3.91
RockTenn	North Chicago, IL	151,798	3	0	2	0	3.95
International Paper	Manitowoc, WI*	151,511	3	0	0	0	3.96
International Paper	El Paso, TX *	97,049	2	0	0	0	4.12

International Paper	Lincoln, IL*	94,862	2	0	1	0	4.22
International Paper	Olive Branch, MS*	93,217	2	0	0	0	4.29
International Paper	Marion, OH*	92,916	2	0	0	0	4.30
Green Bay Packaging	Twin Town, MN	134,092	3	0	1	0	4.47
International Paper	Louisville, KY*	88,408	2	2	0	0	4.52
International Paper	Bogalusa, LA	169,272	4	2	1	0	4.73
International Paper	Crawfordsville, IN	165,990	4	0	0	0	4.82
RockTenn	Devens, MA	123,773	3	0	3	0	4.85
International Paper	Imperial Valley, CA	144,456	4	0	2	0	5.54
International Paper	Tolleson, AZ*	139,112	4	3	1	0	5.75
International Paper	Moses Lake, WA *	102,298	3	1	0	0	5.87
RockTenn	Bridgeview, IL	128,190	4	0	1	0	6.24
International Paper	Exeter, CA*	125,965	4	1	0	0	6.35
International Paper	Newark, OH*	89,713	3	1	0	0	6.69
Green Bay Packaging	Kalamazoo, MI	174,079	6	0	5	0	6.89
Green Bay Packaging	GB Shipping Cont., WI	290,513	11	2	6	0	7.57
RockTenn	City of Mount Royal, QC	88,572	4	0	2	0	9.03
Green Bay Packaging	Wausau, WI	164,513	9	0	5	0	10.94
International Paper	Kansas City, MO*	13,320	2	0	0	0	30.03
<b>Weighted Average for Category</b>							<b>1.6</b>
	*= Non-Member	<b>30,407,532</b>	<b>236</b>	<b>34</b>	<b>75</b>	<b>0</b>	

Box Plants without a corrugator			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	Mexicali, MX	317,372	0	0	0	0	0.00
International Paper	Houston, MS	118,735	0	0	0	0	0.00
RockTenn	Gallatin, TN (Fullfillment)	114,224	0	0	0	0	0.00
International Paper	Utica, NY	94,999	0	0	0	0	0.00
International Paper	Madison, OH	85,957	0	0	0	0	0.00
RockTenn	Beloit, WI	66,162	0	0	0	0	0.00
International Paper	Buffalo, NY	58,426	0	0	0	0	0.00
RockTenn	Gallatin, TN (Sheet)	54,591	0	0	0	0	0.00
RockTenn	Highland, IL	47,652	0	0	0	0	0.00
RockTenn	Des Moines, IA	41,901	0	0	0	0	0.00
RockTenn	Springfield, MO	39,122	0	0	0	0	0.00
International Paper	Milltown, NJ	36,557	0	0	0	0	0.00
RockTenn	Houston, TX	36,008	0	0	0	0	0.00
International Paper	Union City, CA	34,456	0	0	0	0	0.00
RockTenn	Ft. Smith, AR	33,804	0	0	0	0	0.00
Green Bay Packaging	Chickasha, OK	30,014	0	0	0	0	0.00
RockTenn	Roseville, MN	29,470	0	0	0	0	0.00
Longview Fibre Paper & Pg	Cedar City, UT	25,564	0	0	0	0	0.00
International Paper	Littlestown, PA	25,449	0	0	0	0	0.00
RockTenn	Rochester, MN	22,724	0	0	0	0	0.00
International Paper	Ft. Smith, AR	22,073	0	0	0	0	0.00
International Paper	Scotia, NY	22,028	0	0	0	0	0.00
International Paper	Mack Chicago, IL	19,384	0	0	0	0	0.00
International Paper	Ashand City Sheet, TN	19,322	0	0	0	0	0.00
RockTenn	Dayton, NJ	17,442	0	0	0	0	0.00
RockTenn	West Chester, OH	120,709	1	0	0	0	1.66
RockTenn	Springfield, MA	95,493	1	0	0	0	2.09
International Paper	Ocotlan, Coronago, MX	76,163	1	0	1	0	2.63
RockTenn	Lexington, KY	59,973	1	0	0	0	3.33
RockTenn	Neenah, WI	58,083	1	1	0	0	3.44
International Paper	Elizabethton Sheet Plant, TN	87,497	2	0	0	0	4.57
RockTenn	Collierville, TN	40,290	1	1	0	0	4.96
International Paper	St. Anthony, IN	37,731	1	0	0	0	5.30
RockTenn	Spartanburg, SC	112,595	3	0	2	0	5.33
International Paper	Toughkenamon, PA	30,070	1	0	1	0	6.65
Weighted Average for Category							1.2
		2,132,039	13	2	4	0	



Folding Carton			Total OSHA Log LWDC RWDC Fatalities				
			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
COMPANY	CITY/Location Name	Hours					
RockTenn	Warwick, Quebec	407,028	0	0	0	0	0.00
RockTenn	Waxahachie, TX	177,091	0	0	0	0	0.00
RockTenn	Candiac, Quebec	165,482	0	0	0	0	0.00
RockTenn	Greenville, TX	143,469	0	0	0	0	0.00
RockTenn	Ste-Marie, Quebec	133,362	0	0	0	0	0.00
RockTenn	Claremont, NC	110,440	0	0	0	0	0.00
RockTenn	Columbus, GA	72,796	0	0	0	0	0.00
RockTenn	Livingston, AL	43,018	0	0	0	0	0.00
RockTenn	Conover, NC	293,659	2	0	1	0	1.36
RockTenn	Marion, NC	292,825	2	0	1	0	1.37
RockTenn	Joplin, MO	241,394	2	0	1	0	1.66
RockTenn	Lebanon, TN	110,492	1	1	0	0	1.81
RockTenn	Conway, AR	325,390	3	1	0	0	1.84
RockTenn	Eutaw, AL	210,769	2	1	0	0	1.90
RockTenn	Harrison, AR	203,945	2	0	0	0	1.96
RockTenn	Knoxville, TN	186,605	2	1	0	0	2.14
RockTenn	Nicholasville, KY	275,027	3	0	1	0	2.18
RockTenn	Hazleton, PA	84,205	1	0	1	0	2.38
RockTenn	Kimball, TN	209,968	4	1	2	0	3.81
RockTenn	Clinton, IA	242,593	5	0	4	0	4.12
RockTenn	Fresno, CA	89,155	3	0	3	0	6.73
Green Bay Packaging	Depere, WI	101,460	4	1	1	0	7.88
<b>Weighted Average for Category</b>							<b>1.75</b>
*= Non-Member		<b>4,120,174</b>	<b>36</b>	<b>6</b>	<b>15</b>	<b>0</b>	

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	Olathe, NE *	192,771	0	0	0	0	0.0
International Paper	Wilmington, MA *	142,873	0	0	0	0	0.0
International Paper	Denver- X, CO *	139,396	0	0	0	0	0.0
International Paper	Cincinnati - X, OH *	135,559	0	0	0	0	0.0
International Paper	Harrisburg, PA *	131,072	0	0	0	0	0.0
International Paper	Glendale Heights, IL *	117,388	0	0	0	0	0.0
International Paper	Greensboro-X, NC *	110,379	0	0	0	0	0.0
International Paper	Chihuahua, OO-X*	109,738	0	0	0	0	0.0
International Paper	Dallas, TX *	109,725	0	0	0	0	0.0
International Paper	Camp Hill, PA *	101,075	0	0	0	0	0.0
International Paper	Reynosa, Tam., OO *	98,911	0	0	0	0	0.0
International Paper	Rochester - X, NY *	95,806	0	0	0	0	0.0
International Paper	Chihuahua, OO(Juarez)*	85,670	0	0	0	0	0.0
International Paper	Valley View, OH *	81,326	0	0	0	0	0.0
International Paper	Kent, WA *	73,593	0	0	0	0	0.0
International Paper	Grand Rapids - X, MI *	72,040	0	0	0	0	0.0
International Paper	Charlotte-X, NC *	69,444	0	0	0	0	0.0
International Paper	Phoenix - X, AZ *	66,957	0	0	0	0	0.0
International Paper	Fenton, MO *	66,007	0	0	0	0	0.0

International Paper	Saalfeld - Atlanta, GA *	62,761	0	0	0	0	0.0
International Paper	Raleigh, NC *	61,676	0	0	0	0	0.0
International Paper	Hayward/Huntwood CA *	59,667	0	0	0	0	0.0
International Paper	Pittsburgh - X, PA *	58,368	0	0	0	0	0.0
International Paper	Addison, IL *	55,796	0	0	0	0	0.0
International Paper	Columbia-X, SC *	54,345	0	0	0	0	0.0
International Paper	Lakeland, FL *	52,321	0	0	0	0	0.0
International Paper	Richmond-P&G, VA *	48,824	0	0	0	0	0.0
International Paper	Ankeny, IA *	43,683	0	0	0	0	0.0
International Paper	Louisville - X, KY *	42,653	0	0	0	0	0.0
International Paper	Roanoke-lip/Salem, VA *	41,030	0	0	0	0	0.0
International Paper	Indianapolis - X, IN *	38,693	0	0	0	0	0.0
International Paper	Oklahoma City- X, OK *	37,450	0	0	0	0	0.0
International Paper	New York - Bulkey, NY *	36,534	0	0	0	0	0.0
Mohawk Fine Papers, Inc.	Albany, NY	35,705	0	0	0	0	0.0
International Paper	Omaha- X, NE *	33,669	0	0	0	0	0.0
International Paper	West Haven, CT *	33,397	0	0	0	0	0.0
International Paper	Cheektowaga, NY *	32,293	0	0	0	0	0.0
International Paper	Nashville, TN *	30,709	0	0	0	0	0.0
International Paper	Lynchburg, VA *	29,317	0	0	0	0	0.0
International Paper	Grove City, OH *	28,675	0	0	0	0	0.0
International Paper	Birmingham, AL *	28,309	0	0	0	0	0.0
International Paper	Springfield, MO *	28,171	0	0	0	0	0.0
International Paper	Fresno, CA *	27,824	0	0	0	0	0.0
International Paper	Tulsa-X, OK *	27,751	0	0	0	0	0.0
International Paper	Wichita, KS *	27,182	0	0	0	0	0.0
International Paper	Orlando - X, FL *	26,040	0	0	0	0	0.0
International Paper	Portland, ME *	25,509	0	0	0	0	0.0
International Paper	Syracuse, NY *	24,318	0	0	0	0	0.0
International Paper	Memphis- X, TN *	23,684	0	0	0	0	0.0
International Paper	Honolulu, HI *	23,666	0	0	0	0	0.0
International Paper	Miami, FL *	22,777	0	0	0	0	0.0
International Paper	Billings, MT *	22,203	0	0	0	0	0.0
International Paper	Miramar, FL *	20,729	0	0	0	0	0.0
International Paper	Cincinnati Nat. Accts, OH *	17,867	0	0	0	0	0.0
International Paper	Alexandria, LA *	16,275	0	0	0	0	0.0
International Paper	Sacramento-X, CA *	16,257	0	0	0	0	0.0
International Paper	Erie, PA *	15,349	0	0	0	0	0.0
International Paper	Memphis Nat. Accts, TN *	13,998	0	0	0	0	0.0
International Paper	Boise, ID *	13,358	0	0	0	0	0.0
International Paper	Greenville-X, SC *	12,908	0	0	0	0	0.0
International Paper	Joplin, MO *	12,349	0	0	0	0	0.0
International Paper	Albany - X, NY *	12,285	0	0	0	0	0.0
International Paper	Little Rock - X, AR *	11,733	0	0	0	0	0.0
International Paper	Fargo, ND *	11,601	0	0	0	0	0.0
International Paper	Shreveport, LA *	11,290	0	0	0	0	0.0
International Paper	Columbia, MO *	10,680	0	0	0	0	0.0
International Paper	Cleveland, OH *	10,069	0	0	0	0	0.0
International Paper	Colorado Springs-X, CO *	8,957	0	0	0	0	0.0
International Paper	Kimberly, WI(AppletonX) *	8,942	0	0	0	0	0.0
International Paper	Las Vegas - X, NV *	8,794	0	0	0	0	0.0
International Paper	Norfolk, VA *	8,763	0	0	0	0	0.0

International Paper	Appleton, WI(Strategic) *	8,677	0	0	0	0	0.0
International Paper	Troy, MI *	8,458	0	0	0	0	0.0
International Paper	El Paso Custom Svcs, TX *	8,327	0	0	0	0	0.0
International Paper	Denver - Ps, CO *	8,171	0	0	0	0	0.0
International Paper	Wilmington, NC *	7,899	0	0	0	0	0.0
International Paper	Wilkes-Barr, PA *	7,716	0	0	0	0	0.0
International Paper	Lexington, KY *	6,911	0	0	0	0	0.0
International Paper	Bristol, TN *	6,761	0	0	0	0	0.0
International Paper	Spokane, WA *	6,699	0	0	0	0	0.0
International Paper	Winston Salem, NC *	6,673	0	0	0	0	0.0
International Paper	Salt Lake City- Ps, Utv*	6,545	0	0	0	0	0.0
International Paper	Chicago, IL(Strategic) *	6,534	0	0	0	0	0.0
International Paper	Buffalo Grove, IL *	6,447	0	0	0	0	0.0
International Paper	Kansas City, MO *	6,433	0	0	0	0	0.0
International Paper	Rochester P&G, NY *	6,388	0	0	0	0	0.0
International Paper	Indianapolis- Arvey, IN *	6,297	0	0	0	0	0.0
International Paper	Baltimore, MD *	6,193	0	0	0	0	0.0
International Paper	Omaha, NE - Nat. Accts *	5,702	0	0	0	0	0.0
International Paper	Fort Wayne-Corp, IN *	5,656	0	0	0	0	0.0
International Paper	Augusta, GA *	5,591	0	0	0	0	0.0
International Paper	Pittsburgh- Arvey, PA *	5,506	0	0	0	0	0.0
International Paper	Philadelphia P&G / Spg Gdn *	5,382	0	0	0	0	0.0
International Paper	Fairfax, VA *	5,283	0	0	0	0	0.0
International Paper	Morrisville, NC *	5,160	0	0	0	0	0.0
International Paper	Burlington, NJ *	4,912	0	0	0	0	0.0
International Paper	E. Syracuse, NE *	4,893	0	0	0	0	0.0
International Paper	Stockton, CA *	4,838	0	0	0	0	0.0
International Paper	Houston-P&G/Central, TX *	4,833	0	0	0	0	0.0
International Paper	Dayton-X, OH *	4,683	0	0	0	0	0.0
International Paper	Flint, MI *	4,651	0	0	0	0	0.0
International Paper	Charleston-X, SC *	4,616	0	0	0	0	0.0
International Paper	Livonia, MI *	4,608	0	0	0	0	0.0
International Paper	Bloomington, MN *	4,524	0	0	0	0	0.0
International Paper	Chattanooga, TN *	4,473	0	0	0	0	0.0
International Paper	St. Louis-P&G/Lilburn, MO *	4,469	0	0	0	0	0.0
International Paper	Cincinnati-, OH *	4,356	0	0	0	0	0.0
International Paper	Yakima, WA *	4,267	0	0	0	0	0.0
International Paper	Arvada, CO *	4,266	0	0	0	0	0.0
International Paper	Salt Lake City- Arvey, UT *	4,226	0	0	0	0	0.0
International Paper	Louisville-P&G, KY *	4,105	0	0	0	0	0.0
International Paper	Jacksonville - X, FL *	4,069	0	0	0	0	0.0
International Paper	Port Huron, MI *	4,003	0	0	0	0	0.0
International Paper	Louisville -Arvey, KY *	3,908	0	0	0	0	0.0
International Paper	Philadelphia-P&G, PA *	3,784	0	0	0	0	0.0
International Paper	Little Rock P&G, AR *	3,740	0	0	0	0	0.0
International Paper	Newport, DE *	3,740	0	0	0	0	0.0
International Paper	El Paso -PS, TX *	3,673	0	0	0	0	0.0
International Paper	Memphis-P&G/Union, TN *	3,600	0	0	0	0	0.0
International Paper	Orem, UT *	3,527	0	0	0	0	0.0

International Paper	Rochester, NY (Hartford) *	3,241	0	0	0	0	0.0
International Paper	Tulsa-P&G, OK *	3,194	0	0	0	0	0.0
International Paper	St. Louis-P&G/Kings, MO *	3,025	0	0	0	0	0.0
International Paper	Lubbock, TX *	2,991	0	0	0	0	0.0
International Paper	Minneapolis-P&G, MN *	2,830	0	0	0	0	0.0
International Paper	Van Nuys, CA *	2,822	0	0	0	0	0.0
International Paper	Tempe, AZ *	2,785	0	0	0	0	0.0
International Paper	Stamford, CT *	2,616	0	0	0	0	0.0
International Paper	Anaheim P&G, CA *	2,615	0	0	0	0	0.0
International Paper	Gardena, CA *	2,611	0	0	0	0	0.0
International Paper	Sacramento-P&G/Vine, CA *	2,580	0	0	0	0	0.0
International Paper	Hackensack, NJ *	2,479	0	0	0	0	0.0
International Paper	Roseville-P&G, MI *	2,443	0	0	0	0	0.0
International Paper	Havertown, PA *	2,413	0	0	0	0	0.0
International Paper	Wenatchee, WAS *	2,410	0	0	0	0	0.0
International Paper	Ann Arbor, MI*	2,395	0	0	0	0	0.0
International Paper	San Diego-P&G, CA *	2,346	0	0	0	0	0.0
International Paper	Woburn, MA *	2,344	0	0	0	0	0.0
International Paper	Willow Grove, PA *	2,340	0	0	0	0	0.0
International Paper	Cedar Rapids, IA *	2,288	0	0	0	0	0.0
International Paper	Cheektowago, NY *	2,231	0	0	0	0	0.0
International Paper	Oklahoma City-P&G, OK *	2,214	0	0	0	0	0.0
International Paper	Colorado Springs - Ps, CO *	2,174	0	0	0	0	0.0
International Paper	Tampa-P&G, FL *	2,125	0	0	0	0	0.0
International Paper	Sioux City, IA *	1,972	0	0	0	0	0.0
International Paper	Scranton, PA *	1,907	0	0	0	0	0.0
International Paper	Charlotte-P&G, NC *	1,862	0	0	0	0	0.0
International Paper	North Canton, OH *	1,857	0	0	0	0	0.0
International Paper	Westbury, NY *	1,834	0	0	0	0	0.0
International Paper	Albany P&G, NY *	1,816	0	0	0	0	0.0
International Paper	Jacksonville -P&G, FL *	1,812	0	0	0	0	0.0
International Paper	Austin, TX *	1,753	0	0	0	0	0.0
International Paper	Ft Lauderdale, FL *	1,739	0	0	0	0	0.0
International Paper	Quincy, MA *	1,690	0	0	0	0	0.0
International Paper	Orlando-P&G, FL *	1,598	0	0	0	0	0.0
International Paper	Columbus, OH *	1,536	0	0	0	0	0.0
International Paper	Greensboro Scrh, NC *	1,522	0	0	0	0	0.0
International Paper	Atlanta, GA (P&G)*	1,516	0	0	0	0	0.0
International Paper	Albuquerque-P&G, NM *	1,404	0	0	0	0	0.0
International Paper	Sparks, NV *	1,132	0	0	0	0	0.0
International Paper	Greenville-P&G, SC *	1,012	0	0	0	0	0.0
International Paper	Pewaukee, WI *	924	0	0	0	0	0.0
International Paper	Chicago, IL*	856	0	0	0	0	0.0
International Paper	Phoenix P & G, AZ *	746	0	0	0	0	0.0
International Paper	Farmingdale, NY *	572	0	0	0	0	0.0
International Paper	Chicago, IL (Kimball)*	394	0	0	0	0	0.0
International Paper	Greenville-lip, SC *	381	0	0	0	0	0.0
International Paper	Las Vegas P&G, NV *	370	0	0	0	0	0.0
International Paper	Norcross, GA *	344	0	0	0	0	0.0
International Paper	Seattle, WA *	319	0	0	0	0	0.0

International Paper	Oak Park, MI *	317	0	0	0	0	0.0
International Paper	Memphis-P&G/Quince, TN *	144	0	0	0	0	0.0
International Paper	North Kansas City, MO *	136	0	0	0	0	0.0
International Paper	Grand Rapids P & G, MI *	80	0	0	0	0	0.0
International Paper	Richmond West I I P, VA *	32	0	0	0	0	0.0
International Paper	Loveland, OH *	721,146	1	0	0	0	0.3
International Paper	Downey, CA *	241,241	1	1	0	0	0.8
International Paper	Livonia, MI (Detroit)*	176,622	1	1	0	0	1.1
International Paper	Salt Lake City - X, UT *	166,074	1	0	1	0	1.2
International Paper	Stone Mountain, GA (AtlantaX)*	128,172	1	0	0	0	1.6
International Paper	Minneapolis - X, MN *	94,885	1	0	0	0	2.1
International Paper	Hayward/Wiegman CA *	93,675	1	0	0	0	2.1
International Paper	Tampa - X, FL *	85,271	1	0	0	0	2.3
International Paper	Portland, OR - X *	82,362	1	0	0	0	2.4
International Paper	Pewaukee - X, WI *	81,640	1	0	0	0	2.4
International Paper	Clifton - X, NJ *	145,360	2	2	0	0	2.8
International Paper	Hanover, MD *	127,925	2	1	1	0	3.1
International Paper	La Mirada, Packaging, CA *	59,515	1	0	0	0	3.4
International Paper	Knoxville- X, TN *	47,679	1	1	0	0	4.2
International Paper	El Paso- X, TX *	38,667	1	0	0	0	5.2
International Paper	Hebron, KY *	153,751	4	2	1	0	5.2
International Paper	Houston - X, TX *	48,869	2	1	1	0	8.2
International Paper	La Mirada, CA Nat. Accts *	17,861	1	1	0	0	11.2
International Paper	Stevens Point, WI *	11,811	1	0	0	0	16.9
<b>Weighted Average for Category</b>							<b>0.79</b>
*= Non-Member		<b>6,350,721</b>	<b>25</b>	<b>10</b>	<b>4</b>	<b>0</b>	

Sheeting & Sheet Feeder Plants			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
Boise White Paper	Jackson, AL	123,474	0	0	0	0	0.00
International Paper	Midwest Sheets	90,078	0	0	0	0	0.00
International Paper	Gilroy (Bay Sheets)	82,069	0	0	0	0	0.00
International Paper	Hazleton, PA *	72,858	0	0	0	0	0.00
International Paper	Springhill, LA *	71,809	0	0	0	0	0.00
International Paper	Ft. Worth, TX *	70,348	0	0	0	0	0.00
RockTenn	Hanover Park, IL	66,626	0	0	0	0	0.00
International Paper	Greensboro, NC *	62,448	0	0	0	0	0.00
International Paper	Fridley, MN *	57,256	0	0	0	0	0.00
International Paper	North Kansas City, MO *	53,778	0	0	0	0	0.00
International Paper	Russellville AR *	52,520	0	0	0	0	0.00
International Paper	Huntsville, AL *	51,221	0	0	0	0	0.00
International Paper	Maryland Heights, MO *	49,535	0	0	0	0	0.00
International Paper	Byesville, OH *	44,680	0	0	0	0	0.00
International Paper	San Leandro, CA *	42,137	0	0	0	0	0.00
International Paper	Stockton, CA *	41,064	0	0	0	0	0.00
International Paper	Dothan, AL *	24,829	0	0	0	0	0.00
International Paper	Shreveport, LA *	18,894	0	0	0	0	0.00
International Paper	Kennesaw, GA *	9,996	0	0	0	0	0.00
International Paper	Edinburg, TX *	8,338	0	0	0	0	0.00
International Paper	Gateway Sheets - St. Louis, MO	75,347	1	0	0	0	2.65
RockTenn	Athens, AL	71,428	1	0	1	0	2.80
RockTenn	Bedford Park, IL	68,183	1	0	0	0	2.93
RockTenn	Philadelphia, PA	46,918	1	0	0	0	4.26
RockTenn	Milwaukee, WI	85,905	2	0	2	0	4.66
International Paper	Minneapolis, MN *	40,516	1	0	0	0	4.94
International Paper	Ontario, CA *	29,290	1	0	1	0	6.83
International Paper	Texas Sheets (San Antonio, TX)	83,500	3	2	0	0	7.19
International Paper	Jacksonville, FL *	20,548	1	0	1	0	9.73
<b>Weighted Average for Category</b>		*= Non-Member					<b>1.5</b>
		<b>1,615,590</b>	<b>12</b>	<b>2</b>	<b>5</b>	<b>0</b>	

Fine 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
Domtar	Dubois, PA	86,811	0	0	0	0	0.00
Domtar	Washington Court House, OH	82,720	0	0	0	0	0.00
Domtar	Rock Hill, SC	59,292	0	0	0	0	0.00
Domtar	Ridgefields, TN	57,046	0	0	0	0	0.00
Domtar	Addison, IL	45,879	0	0	0	0	0.00
Domtar	Brownsville, TN	42,702	0	0	0	0	0.00
Domtar	Tatum, SC	35,525	0	0	0	0	0.00
Domtar	Indianapolis Converting, IN	88,402	1	0	0	0	2.26
Domtar	Owensboro, KY	72,046	1	0	0	0	2.78
Domtar	Dallas/Fort Worth, TX	62,587	1	1	0	0	3.20
<b>Weighted Average for Category</b>							<b>0.95</b>
		<b>633,010</b>	<b>3</b>	<b>1</b>	<b>0</b>	<b>0</b>	

Specialty Division			Total OSHA Log LWDC RWDC Fatalities				
			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
COMPANY	CITY/Location Name	Hours					
RockTenn	Mississaugam ON CAN	71,165	0	0	0	0	0.00
RockTenn	Richmond, BC	41,332	0	0	0	0	0.00
Buckeye Lumberton	Lumberton, NC	32,778	0	0	0	0	0.00
Mohawk Fine Papers	Elmira, NY	7,570	0	0	0	0	0.00
Mohawk Fine Papers	Saybrook, Ashtabula, OH	131,384	1	0	0	0	1.52
RockTenn	Orlando, FL	82,767	1	0	0	0	2.42
Green Bay Packaging	Slitting(Four Locations)	40,273	1	0	0	0	4.97
Green Bay Packaging	Green Bay, WI	282,918	9	0	6	0	6.36
Green Bay Packaging	Winchester, VA	84,992	3	0	0	0	7.06
Mohawk Fine Papers	SCC, Cohoes, NY	38,399	3	0	0	0	15.63
Weighted Average for Category							4.4
	*= Non-Member	813,578	18	0	6	0	

Sawmills			Total OSHA Log LWDC RWDC Fatalities				
			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
COMPANY	CITY/Location Name	Hours					
Rayonier	Baxley, GA	140,061	0	0	0	0	0.00
Rayonier	Swainsboro, GA	103,173	0	0	0	0	0.00
Rayonier	Eatonton, GA	91,402	0	0	0	0	0.00
Meadwestvaco	Cottonton, AL	226,853	4	2	0	0	3.53
Green Bay Packaging	Pincrest, AR	77,212	6	0	0	0	15.54
							3.1
Weighted Average for Category		638,701	10	2	0	0	

Woodlands			Total OSHA Log LWDC RWDC Fatalities				
			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
COMPANY	CITY/Location Name	Hours					
Green Bay Packaging	Fiber Resources, AR	33,739	0	0	0	0	0.00
International Paper	Orange, TX*	11,409	0	0	0	0	0.00
International Paper	Rome, GA*	8,983	0	0	0	0	0.00
International Paper	Bogalusa, LA *	1,608	0	0	0	0	0.00
RockTenn	Demopolis, AL	27,067	1	0	0	0	7.39
RockTenn	Coatopa, AL	14,089	1	1	0	0	14.20
Weighted Average for Category							4.1
	*= Non-Member	96,895	2	1	0	0	



Building Products			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	Diboll, TX Lumber	203,065	0	0	0	0	0.00
International Paper	Rome, GA Lumber *	192,644	0	0	0	0	0.00
International Paper	Mt. Jewett, PA MDF	132,891	0	0	0	0	0.00
International Paper	Diboll, TX Fiber Products	120,997	0	0	0	0	0.00
International Paper	Hope, AR	116,377	0	0	0	0	0.00
International Paper	Diboll Particleboard	113,858	0	0	0	0	0.00
International Paper	Fletcher, OK Gypsum	105,491	0	0	0	0	0.00
RockTenn	Lynchburg, VA (Seven Hills)	81,970	0	0	0	0	0.00
International Paper	McQueeney, TX Gypsum	65,145	0	0	0	0	0.00
International Paper	West Memphis, AR Gypsum	47,155	0	0	0	0	0.00
International Paper	Diboll, TX Fingerjointing	21,766	0	0	0	0	0.00
International Paper	Buna Lumber, TX*	3,832	0	0	0	0	0.00
International Paper	Cumberland City, TN	113,085	1	0	0	0	1.77
International Paper	Pineland, TX Lumber*	311,607	3	0	0	0	1.93
International Paper	Thomson, GA	97,352	1	0	0	0	2.05
International Paper	Pineland, TX Stud*	111,379	2	0	0	0	3.59
International Paper	DeQuincy, LA*	196,337	4	0	1	0	4.07
International Paper	Monroeville, AL	111,369	3	0	1	0	5.39
International Paper	Fredericksburg, TX Gypsum	17,617	1	1	0	0	11.35
Weighted Average for Category							1.4
*= Non-Member		2,163,934	15	1	2	0	

Other 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					
International Paper	Kenton, OH (Foodservice)*	552,309	0	0	0	0	0.00
International Paper	Thorofare, NJ*	229,261	0	0	0	0	0.00
RockTenn	Winston-Salem, NC (Assembly)	159,175	0	0	0	0	0.00
International Paper	Carol Stream, IL*	134,691	0	0	0	0	0.00
International Paper	Tucker, GA*	87,597	0	0	0	0	0.00
RockTenn	Frenchtown, NJ	77,858	0	0	0	0	0.00
RockTenn	Scarborough, ME	77,615	0	0	0	0	0.00
International Paper	Sturgis, MI*	77,250	0	0	0	0	0.00
RockTenn	Merced, CA	74,941	0	0	0	0	0.00
International Paper	Indianapolis, IN*	68,995	0	0	0	0	0.00
International Paper	Beaverton, OR*	67,904	0	0	0	0	0.00
RockTenn	San Bernardo, Chile	63,208	0	0	0	0	0.00
RockTenn	Toronto, ON	62,929	0	0	0	0	0.00
International Paper	Prosperity, SC*	58,635	0	0	0	0	0.00
RockTenn	Hartwell, GA	56,058	0	0	0	0	0.00
RockTenn	Marlton, NJ	54,742	0	0	0	0	0.00
RockTenn	Jacksonville, FL	53,818	0	0	0	0	0.00
RockTenn	Ridgeway, VA	53,526	0	0	0	0	0.00
RockTenn	Monterrey, MX	53,195	0	0	0	0	0.00
RockTenn	Dallas, TX	46,983	0	0	0	0	0.00
RockTenn	Winston-Salem, NC (Permanent)	46,439	0	0	0	0	0.00
RockTenn	Saint Louis, MO	42,726	0	0	0	0	0.00
RockTenn	Edwardsville, IL	42,304	0	0	0	0	0.00
RockTenn	West Chester, OH	36,210	0	0	0	0	0.00
International Paper	Hillsboro, OR*	34,774	0	0	0	0	0.00
RockTenn	Bolingbrook, IL	33,971	0	0	0	0	0.00
RockTenn	Tukwila, WA	32,874	0	0	0	0	0.00
RockTenn	Stockton, CA	29,869	0	0	0	0	0.00
International Paper	Menomonee, WI*	29,633	0	0	0	0	0.00
RockTenn	Mississauga, ON CAN (Assembly)	29,632	0	0	0	0	0.00
RockTenn	Plymouth, IN (Knox)	24,720	0	0	0	0	0.00
RockTenn	Tulare, CA	23,411	0	0	0	0	0.00
International Paper	Delaware, OH*	20,528	0	0	0	0	0.00
RockTenn	Plymouth, IN (Central)	18,720	0	0	0	0	0.00
RockTenn	Atlanta, GA (Pre-Print)	17,522	0	0	0	0	0.00
International Paper	Cypress, CA (LA Retail)*	16,635	0	0	0	0	0.00
International Paper	Kenton, OH (Optihue)*	6,726	0	0	0	0	0.00
International Paper	Bentonville, AR*	6,548	0	0	0	0	0.00
RockTenn	Tucker, GA	6,327	0	0	0	0	0.00
International Paper	Cerritos, CA*	4,302	0	0	0	0	0.00
International Paper	Cincinnati, OH*	2,184	0	0	0	0	0.00
International Paper	Stone Mountain, GA*	2,010	0	0	0	0	0.00
International Paper	Shelbyville, IL*	866,053	2	0	0	0	0.46
International Paper	Indianapolis, IN*	290,202	1	0	0	0	0.69
International Paper	Visalia, CA*	284,611	1	0	0	0	0.70
International Paper	Charlotte, NC*	648,519	4	2	2	0	1.23
RockTenn	Plymouth, IN	120,546	1	1	0	0	1.66
RockTenn	Saint Charles, MO	104,024	1	0	0	0	1.92
RockTenn	Iowa City, IA	97,471	1	0	0	0	2.05
RockTenn	Charleroi, PA	90,537	1	1	0	0	2.21
RockTenn	Orange, CA	77,427	1	0	0	0	2.58
RockTenn	Portage-Du-Fort, QBE	67,871	1	1	0	0	2.95
International Paper	Sumter, SC*	115,009	2	0	2	0	3.48
RockTenn	Dekalb, IL	55,288	1	1	0	0	3.62
RockTenn	Atlanta, GA	49,308	1	0	1	0	4.06
RockTenn	Mississauga, ON CAN	98,328	2	0	2	0	4.07
International Paper	Richwood, KY*	48,446	1	0	1	0	4.13
RockTenn	Mendoza, Argentina	40,362	1	1	0	0	4.96
RockTenn	Lithia Springs, GA	75,915	2	0	0	0	5.27
RockTenn	Antizapan, Edo de, MX	30,793	1	1	0	0	6.49
RockTenn	Hebron, KY	24,830	1	0	0	0	8.05
International Paper	Irvine, CA*	24,160	1	0	0	0	8.28
RockTenn	Hillside, IL	163,313	8	0	4	0	9.80
RockTenn	Pickering, Ontario	39,361	2	1	1	0	10.16
<b>Weighted Average for Category</b>							<b>1.23</b>
* = Non-Member		<b>6,031,129</b>	<b>37</b>	<b>9</b>	<b>13</b>	<b>0</b>	

Recycle Collection Centers			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
RockTenn	San Jose	82,395	0	0	0	0	0.00
RockTenn	St. Louis	79,387	0	0	0	0	0.00
RockTenn	Oakland	74,104	0	0	0	0	0.00
RockTenn	St. Louis, MO(Division)	65,674	0	0	0	0	0.00
RockTenn	Maryland Heights, MO	57,280	0	0	0	0	0.00
International Paper	Kent, WA *	56,148	0	0	0	0	0.00
RockTenn	Miami	54,343	0	0	0	0	0.00
RockTenn	Renton(Seattle)	53,427	0	0	0	0	0.00
International Paper	Des Moines, IA *	51,348	0	0	0	0	0.00
International Paper	Fremont, CA*	44,357	0	0	0	0	0.00
International Paper	Omaha, NE*	39,596	0	0	0	0	0.00
RockTenn	Tampa, FL	36,959	0	0	0	0	0.00
RockTenn	Ft Lauderdale	36,946	0	0	0	0	0.00
RockTenn	Chattanooga, TN	36,863	0	0	0	0	0.00
Pratt Industries Recycling	Fayetteville, NC	35,949	0	0	0	0	0.00
International Paper	West Sacramento, CA*	35,350	0	0	0	0	0.00
Pratt Industries Recycling	Shreveport, LA	34,743	0	0	0	0	0.00
RockTenn	Jacksonville North	34,018	0	0	0	0	0.00
RockTenn	Chattanooga, TN (Trading)	33,173	0	0	0	0	0.00
International Paper	Wichita, KS*	32,746	0	0	0	0	0.00
International Paper	Denver, CO*	32,510	0	0	0	0	0.00
RockTenn	Portland, OR (East)	31,328	0	0	0	0	0.00
RockTenn	St. Charles	30,711	0	0	0	0	0.00
International Paper	Roseville, MN*	28,461	0	0	0	0	0.00
International Paper	Phoenix, AZ*	28,077	0	0	0	0	0.00
International Paper	Carrollton, TX *	27,108	0	0	0	0	0.00
Pratt Industries Recycling	Savannah, GA	26,995	0	0	0	0	0.00
RockTenn	Jacksonville South	26,979	0	0	0	0	0.00
International Paper	Charlotte, NC *	25,673	0	0	0	0	0.00
International Paper	Salt Lake City, UT*	24,574	0	0	0	0	0.00
RockTenn	Nashville, TN	24,071	0	0	0	0	0.00
RockTenn	Orlando Taft	20,937	0	0	0	0	0.00
Caraustar	Dalton, GA (incl. Chattanooga)	20,800	0	0	0	0	0.00

Caraustar	Doraville, GA	20,400	0	0	0	0	0.00
International Paper	Itasca, IL*	20,188	0	0	0	0	0.00
International Paper	Eugene, OR*	20,087	0	0	0	0	0.00
RockTenn	Indianapolis, IN	20,041	0	0	0	0	0.00
International Paper	Xalapa, MX*	19,522	0	0	0	0	0.00
Caraustar	Charlotte, NC	19,500	0	0	0	0	0.00
RockTenn	Augusta	19,293	0	0	0	0	0.00
RockTenn	Atlanta, GA (Converting)	18,897	0	0	0	0	0.00
RockTenn	Orlando Sanford	17,587	0	0	0	0	0.00
RockTenn	Fresno, CA	17,443	0	0	0	0	0.00
RockTenn	Philadelphia	17,187	0	0	0	0	0.00
RockTenn	Huntsville, AL	16,557	0	0	0	0	0.00
RockTenn	Kansas City	15,772	0	0	0	0	0.00
RockTenn	Seattle	14,990	0	0	0	0	0.00
Caraustar	Cleveland, OH	14,700	0	0	0	0	0.00
RockTenn	Southside Chicago	13,862	0	0	0	0	0.00
RockTenn	Bakersfield	13,483	0	0	0	0	0.00
RockTenn	Maple Grove, MN	12,417	0	0	0	0	0.00
RockTenn	Sacramento West	12,150	0	0	0	0	0.00
Pratt Industries Recycling	Nashville, TN	11,981	0	0	0	0	0.00
RockTenn	Anchorage	11,483	0	0	0	0	0.00
RockTenn	Memphis, TN	10,730	0	0	0	0	0.00
International Paper	Monterrey, MX, *	9,229	0	0	0	0	0.00
Pratt Industries Recycling	Denton, TX	8,691	0	0	0	0	0.00
Pratt Industries Recycling	Columbia, SC	7,827	0	0	0	0	0.00
RockTenn	Maryland Heights, MO(Multi)	6,338	0	0	0	0	0.00
Pratt Industries Recycling	Memphis, TN	4,457	0	0	0	0	0.00
RockTenn	Gainesville	4,278	0	0	0	0	0.00
RockTenn	Cleveland, OH	3,224	0	0	0	0	0.00
RockTenn	College Park	1,672	0	0	0	0	0.00
RockTenn	Seattle, WA (Canadian)	963	0	0	0	0	0.00
International Paper	Baltimore, MD*	381	0	0	0	0	0.00
Pratt Industries Recycling	East Point, GA	62,836	1	0	0	0	3.18
International Paper	Beaverton, OR *	52,904	1	1	0	0	3.78
International Paper	Richmond, VA*	52,232	1	0	1	0	3.83
RockTenn	Torrance	156,647	3	0	1	0	3.83
RockTenn	Columbus, OH	44,197	1	0	0	0	4.53
Caraustar	Texarkana, TX	39,300	1	1	0	0	5.09

International Paper	Norwalk, CA *	39,074	1	1	0	0	5.12
Pratt Industries Recycling	Duncan, SC	35,865	1	0	1	0	5.58
RockTenn	Cobb County	33,601	1	0	1	0	5.95
RockTenn	Knoxville, TN	32,919	1	0	0	0	6.08
Caraustar	Hardeeville, SC	27,600	1	1	0	0	7.25
RockTenn	Sacramento East	26,241	1	0	0	0	7.62
RockTenn	Louisville, KY	23,373	1	0	0	0	8.56
Pratt Industries Recycling	Winston, NC	22,274	1	1	1	0	8.98
Caraustar	Columbus	20,000	1	1	0	0	10.00
International Paper	Memphis, TN *	17,873	1	0	0	0	11.19
RockTenn	Evansville	10,577	1	0	0	0	18.91
RockTenn	Tucker, GA	22,229	3	0	2	0	26.99
<b>Weighted Average for Category</b>	*= Non-Member						<b>1.8</b>
		<b>2,448,102</b>	<b>22</b>	<b>6</b>	<b>7</b>	<b>0</b>	



## Safety News &amp; Articles



# News Release

U.S. Department of Labor  
Occupational Safety and Health Administration  
Office of Communications  
Washington, D.C.  
[www.osha.gov](http://www.osha.gov)

For Immediate Release  
DATE  
Contact: Office of Communications  
Phone: 202-693-1999

## **OSHA Issues Alert on CSE Corporation's SR-100 Self-Contained Self-Rescuer** *Defective respirators can result in life-threatening hazards*

WASHINGTON – The U.S. Department of Labor's Occupational Safety and Health Administration issued an alert to employers and workers using the CSE Corporation's SR-100 Self-Contained Self-Rescuer (SCSR). Some of these devices have a critical defect that may cause the release of insufficient oxygen during start-up, a defect that could immediately result in a life-threatening situation for workers using the respirator.

"When workers need to escape from a dangerous situation, effective and reliable respiratory protection is essential," said OSHA Assistant Secretary Dr. David Michaels. "Employers should immediately take steps to replace these respirators with a different NIOSH-approved self-rescuer or other respirator suitable for emergency escape protection." Employers must remove CSE SR-100's from service no later than May 31, 2012, in accordance with the NIOSH Respirator User Notice "Loss of Start-Up Oxygen in CSE SR-100 Self-Contained Self-Rescuers" of April 26, 2012.

OSHA's underground construction standard (29 CFR 800(g)(2)) requires the use of self-rescuer respirators and OSHA's permit-required confined space standard (29 CFR 1910.146 Appendix E) also identified these respirators as one approach to emergency escape respiratory protection for sewer workers.

The National Institute for Occupational Safety and Health (NIOSH) recently issued a technical report (*Loss of Start-Up Oxygen in CSE SR-100 Self-Contained Self-Rescuers [DHHS (NIOSH) Publication No. 2012-139]*) that found the CSE SR-100 units had an unacceptable defect rate and field-deployed units no longer conform to the minimum requirements for certification under 42 CFR Part 84. Accordingly, employers and employees should no longer rely upon this device as an escape respirator during emergencies.

Under OSHA's respiratory protection standard (29 CFR 1910.134), employers must provide training to ensure that workers know what to do should their SCSR fail to activate. Employers and workers should immediately obtain another SCSR if they encounter any difficulty with the operation of an SCSR.

Under the Occupational Safety and Health Act of 1970, employers are responsible for providing safe and healthful workplaces for their employees. OSHA's role is to assure these conditions for America's working men and women by setting and enforcing standards, and providing training, education and assistance. For more information, visit [www.osha.gov](http://www.osha.gov).

# OSHA ALERT

## Loss of Start-Up Oxygen in CSE SR-100 Self-Contained Self-Rescuers

The Occupational Safety and Health Administration (OSHA) is alerting employers and workers using the CSE Corporation's SR-100 Self-Contained Self-Rescuer (SCSR) to potential failure problems with these respirators.

Some of these devices have a critical defect that may cause insufficient oxygen to be released during start-up and allow individuals using or depending upon the respirator to be exposed to immediately dangerous to life or health (IDLH) conditions. The use of self-rescuer respirators is required by OSHA's Underground Construction standard (29 CFR 1926.800(g)(2)), and they are also identified as one approach to emergency escape respiratory protection for sewer workers under the Permit-required Confined Spaces standard (29 CFR 1910.146, Appendix E). They may also be found in chemical and pulp/paper plants. Employers should immediately take steps to replace CSE SR-100 respirators with a different National Institute for Occupational Safety and Health (NIOSH) approved self-rescuer or other respirator suitable for emergency escape protection.

The availability of sufficient start-up oxygen is critical to the performance of the SR-100. NIOSH recently issued a technical report (*Loss of Start-Up Oxygen in CSE SR-100 Self-Contained Self-Rescuers*) [DHHS (NIOSH) Publication No. 2012-139] which found that the CSE SR-100 units had an unacceptable defect rate (2% or less), and that they no longer conform to the minimum requirements for certification under 42 CFR Part 84. Accordingly, employers and workers should no longer rely upon this device as an escape respirator during emergencies.

### What steps should employers take?

- Under OSHA's Respiratory Protection Standard (29 CFR 1910.134) employers must provide each worker with training to ensure that the workers



CSE SR-100 Self-Contained Self-Rescuer opened and unopened.



NIOSH approval label on CSE SR-100.

know what to do should their CSE SR-100 respirators fail to activate.

- Employers should immediately take steps to replace CSE SR-100 respirators with a different NIOSH-approved self-rescuer or other respirator suitable for emergency escape protection.



- CSE SR-100's must be removed from service no later than May 31, 2012, in accordance with the NIOSH Respirator User Notice "Loss of Start-Up Oxygen in CSE SR-100 Self-Contained Self-Rescuers" of April 26, 2012. In the interim, before receiving different NIOSH-approved respirators, employers using CSE SR-100's who can do so should make extra units available to all workers. The extra CSE SR-100 respirators should be immediately available to the workers in case the respirator they are wearing fails to activate.

### How can OSHA help employers?

OSHA provides free, On-site Consultation services for small businesses with fewer than 250 workers at a single work site (and no more than 500 employees nationwide). This program provides free on-site compliance assistance to help employers identify and correct job hazards as well as improve injury and illness prevention programs. On-site Consultation services are separate from enforcement and do not result in penalties or citations. To find the local On-site Consultation office nearest you, visit OSHA's website or call 1-800-321-OSHA (6742).

OSHA also has compliance assistance specialists throughout the nation who can provide general information about OSHA standards and compliance assistance resources. Contact your local OSHA office for more information at 1-800-321-OSHA (6742) or visit OSHA's website.

### What rights do workers have?

Workers have the right to:

- Working conditions that do not pose a risk of serious harm.
- Receive information and training (in a language and vocabulary they understand) about hazards, methods to prevent harm, and the OSHA standards that apply to their workplace.
- Review records of work-related injuries and illnesses.
- Get copies of test results that find and measure hazards.
- File a complaint asking OSHA to inspect their workplace if they believe there is a serious hazard or that their employer is not following OSHA's rules. When requested, OSHA will keep all identities confidential.
- Exercise their rights under the Occupational Safety and Health Act without retaliation or discrimination.

For questions or to get information or advice, to report an emergency, a fatality or catastrophe, to order publications or to file a confidential complaint, contact your nearest OSHA office, visit [www.osha.gov](http://www.osha.gov) or call OSHA at 1-800-321-OSHA (6742), TTY 1-877-889-5627.

### Disclaimer

*This OSHA Alert is not a standard or regulation, and it creates no new legal obligations. It contains recommendations as well as descriptions of mandatory safety and health standards [and other regulatory requirements]. The recommendations are advisory in nature, informational in content, and are intended to assist employers in providing a safe and healthful workplace. The Occupational Safety and Health Act requires employers to comply with safety and health standards and regulations promulgated by OSHA or by a state with an OSHA-approved state plan. In addition, the Act's General Duty Clause, Section 5(a)(1), requires employers to provide their employees with a workplace free from recognized hazards likely to cause death or serious physical harm.*



U.S. Department of Labor  
Hilda L. Solis, Secretary of Labor



**Occupational Safety  
and Health Administration**

**1-800-321-OSHA (6742) TTY 1-877-889-5627**  
**[www.osha.gov](http://www.osha.gov)**

**Personal protective equipment gets in the way**

*Following is a personal safety story from a paper machine superintendent whose hard hat saved him from a serious injury:*

I've heard it a thousand times – PPE gets in the way – and now I believe it.

I've been a supervisor for almost 23 years, and I've heard it all. I can't wear my safety glasses because they fog up and they get in my way. I can't wear gloves because I can't feel what I'm doing and they get in the way. I hate wearing rubber boots because my feet get hot and they just get in the way. Hard hats are just for maintenance; they're hot and fall off while I'm working and they just get in the way.

Well, yesterday my hard hat got in the way. While changing a felt on the paper machine, I was asked to get involved when the papermakers had difficulty getting the stretch roll into the proper position. The roll needed to be lifted up and repositioned before it would fit into place, so I directed the operator to lift the roll while I watched the grease fitting clear the machine frame.

What I failed to notice was that the clamp bracket over the roll housing was not secured. When the operator lifted the roll, it caused it to jump out of the lower bracket. When this happened, it swung the 30-pound upper bracket off the roll, striking me directly in the head.

If my hard hat had not gotten in the way, I would not be here today. I received a minor cut on my head instead of a much more serious injury.

PPE gets in the way, but that is what it is designed to do. The human body has a tender makeup of water, nerve endings, and muscle tissue. It is no match for debris, sharp objects, chemicals, or moving equipment.

You may think PPE is heavy, hot, and clumsy and gets in the way of doing your job. It is actually very comfortable and lightweight for the protection it provides.

A ½-ounce pair of glasses will stop a ½-pound object from removing your sight. A 2-ounce pair of gloves will prevent a sharp 2-pound object from cutting off your finger. A 1-pound pair of rubber boots will protect your feet from gallons of harsh chemicals.

I can tell you from experience that a 10-ounce plastic hard hat can save your brain from the force of a 30-pound piece of flying steel!

PPE – it gets in the way, but that's why we wear it.

*Caption: This hard hat saved an employee from receiving a more serious injury to the head.*





TAPPI*SAFE* is an integrated comprehensive safety orientation and verification program for contractors and suppliers that allows individuals to arrive at the mill, ready to go to work. It is also a record management and gate access tool for pulp and paper mills, their contractors, and their suppliers. It consists of a Basic Orientation module, as well as a Site-Specific module.

Basic Orientation applies to all (yes we said all) mills in the program. The Site-Specific module addresses unique safety awareness items at each mill. There is no duplication of content from module to module and both modules include a test to further ensure that the information is understood. This two pronged approach provides a better safety program while simultaneously saving time for both contractors/suppliers and the mills. The best part is that as more mills elect to participate, the stronger the program becomes. For more information visit [TAPPI\*SAFE\*](#). TAPPI is the leading association for the worldwide pulp, paper, packaging and converting industries and publisher of Paper360° and TAPPI JOURNAL. Through information exchange, events, trusted content and networking opportunities, TAPPI helps members elevate their performance by providing solutions that lead to better, faster and more cost-effective ways of doing business. It has provided management training and networking to the industry's leaders for more than 97 years. For more information visit [TAPPI](#)

## The “Eyes” Have It

By John Sunderland

You commonly hear the results of a group voting for some proposal or another as “the Ayes have it” indicating that a majority of the group is in favor of the proposal. A different set of Ayes (actually eyes) also provide special notice.

As people become more aware of safety issues, hazards, rules and tools they find that they notice more unsafe conditions around them than before. You have to wonder why that is the case. I guess it is all in your mind! Take the simple example of purchasing a new vehicle. After your gain possession of the vehicle you tend to see more of them than you used to. That gold colored super Infinity seemed rare before, but now you see a ton of them! Well, maybe I picked the wrong vehicle, but I think you can identify with what I am saying.

It follows along with the fact that many long-term employees who have never been directly active in a safety role find that they begin to think about safety risks in a total different light. Awareness seems to stimulate attentiveness.

Back to the “eyes”: Safety folks seem to notice more things about them that others do. We get used to looking for slip, trip and fall hazards, access to fire extinguishers, etc. and so we look for other things too. Because we are used to looking for things, we tend to pay more attention as we go along. How many times have you gone to an area that you don’t frequent often and immediately spot a hazard? And often, people who go through there every day do not even know a hazard existed.

This provides us with an opportunity. Take advantage of it by taking workers on short visits through areas looking for safe. Lean Management systems refer to “Gemba Walks”. They are about getting manager and leadership out of their offices and into the workplace. The will not be successful unless the person lets their eyes provide data to them, but the good thing is that it is not hard to make the transition from being unaware to finding potential injury sources wherever you go. I know that you already have this skill. Pass it on to those who have not had the chance to excel at it yet.



## **Government Accountability Office (GAO) Report to Congressional Requesters on Safety Incentive Programs**

In their report GAO recommends that OSHA provide guidance about safety incentive programs and other workplace safety policies consistently across the agency's cooperative programs, and add language about safety incentive programs and other workplace safety policies to the guidance provided to inspectors in its field operations manual. OSHA agreed with the recommendations, and noted its plans to address them.

### **What GAO Found**

Little research exists on the effect of workplace safety incentive programs and other workplace safety policies on workers' reporting of injuries and illnesses, but several experts identified a link between certain types of programs and policies and reporting. Researchers distinguish between rate-based safety incentive programs, which reward workers for achieving low rates of reported injuries or illnesses, and behavior-based programs, which reward workers for certain behaviors, such as recommending safety improvements. Of the six studies GAO identified that assessed the effect of safety incentive programs, two analyzed the potential effect on workers' reporting of injuries or illnesses, but they concluded that there was no relationship between the programs and injury and illness reporting. Experts and industry officials, however, suggest that rate-based programs may discourage reporting of injuries and illnesses. Experts and industry officials also reported that certain workplace policies, such as post-incident drug and alcohol testing, may discourage workers from reporting injuries and illnesses. Researchers and workplace safety experts also noted that how safety is managed in the workplace, including employer practices such as fostering open communication about safety about safety issues, may encourage reporting of injuries and illnesses.

To read the full report go to <http://www.gao.gov/assets/590/589964.pdf>



**SAFETY SHARING: PADS AT BASE OF STAIRS**

Recently a contractor had a safety incident where they lost their footing going down steps where the metal steps/handrails terminated to a two-step concrete pad without handrails. This was corrected by extending the handrail. A survey was done throughout the plant and identified similar situations, and all two step or greater pads will have the handrails extended and concrete painted, and all single step pads will be painted yellow. A non-slip surface will be applied to the paint.



Location of incident. Note handrails stop. Handrails extended. Still will repair/paint concrete.



Single-Step Concrete pads will be painted yellow with non-slip surface.


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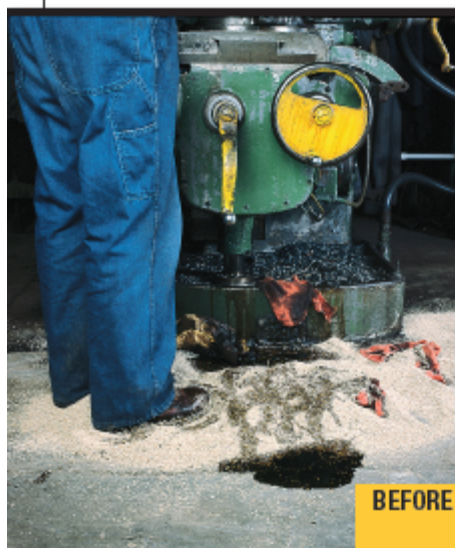
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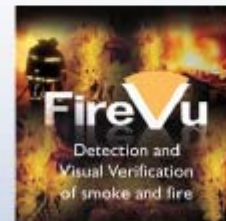
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## Eye on Ergonomics

### To Protect Your Foot and Ankle, Follow These Principles



#### *Tread should match the surface.*

- ⇒ deep intricate tread is appropriate for outdoor work on uneven terrain.
- ⇒ relatively smooth tread patterns are better for dry concrete floors and indoor use.



#### *Support vs. cushioning.*

- ⇒ soft boots feel great at first but tend to break down quickly providing little support.
- ⇒ extremely hard boots may provide great support but some cushioning is required.
- ⇒ aftermarket insoles (purchased separately) can always be used to increase the cushioning.



#### *Consider in-shoe orthotics.*

- ⇒ personalized orthotics to match the bottom of your feet are expensive but can solve many foot related problems.

#### *Try anti-fatigue matting.*

- ⇒ if your job keeps you in one area, try rubber anti-fatigue matting that reduces the strain on your feet by improving blood circulation.



#### *Replace your boots frequently.*

- ⇒ regular use is likely to wear down the sole and arch support of work boots enough to warrant replacement.
- ⇒ if you are on your feet most of the day, consider replacing your boots at least every 6 months.



#### *Match your arch and foot width.*

- ⇒ ensure that the support for the arch in the shoe matches your natural arch.
- ⇒ feet with a high arch need extra support.
- ⇒ boot width is often overlooked but is just as important as length, and arch support.



#### *Walk barefoot in the grass or sand.*

- ⇒ to stimulate the muscles in your feet (when not injured), take short walks barefoot on soft terrain to give your small foot muscles an important 'work-out'.
- ⇒ avoid walking on hard surfaces in bare feet.

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- Participation in the Annual Health and Safety Conference and service as a member of the Board of Directors provides an opportunity for personal and professional growth.
- The Pulp and Paper Safety Association is the ONLY national organization exclusively concerned with accident prevention in the forest product industry.
- The annual Conference provides great face-to-face networking opportunities.
- The Quarterly Report provides a way of bench-marking your own performance with others in similar operations.
- The Awards program provides a prestigious form of recognition to outstanding short-term and long-term safety performance by operating categories.
- The Association is an excellent forum for keeping up with latest OSHA standards.
- In-depth information on specific subjects is increasingly available at regional seminars. The cost of these seminars is minimized by virtue of holding them on a regional basis.
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