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A Letter From Our Chairman

Peter Masias
Corporate Director of Safety & Risk Management
Green Bay Packaging



Thank You PPSA Members for a Great Year!

PPSA's 72nd Annual Safety and Health Conference will be held June 7-10 at the Hyatt Regency in Savannah, Georgia. Registration will be opening soon so please check our [website](#) for more information. This year the conference theme is Engagement. Attendees can expect to hear some valuable insight from our speakers as well as some hot topics on creating systems processes to create stronger employee engagement, generating the rational and emotional commitment from workers that leads to extra effort and how to motivate employees that contributes to a strong safety culture.

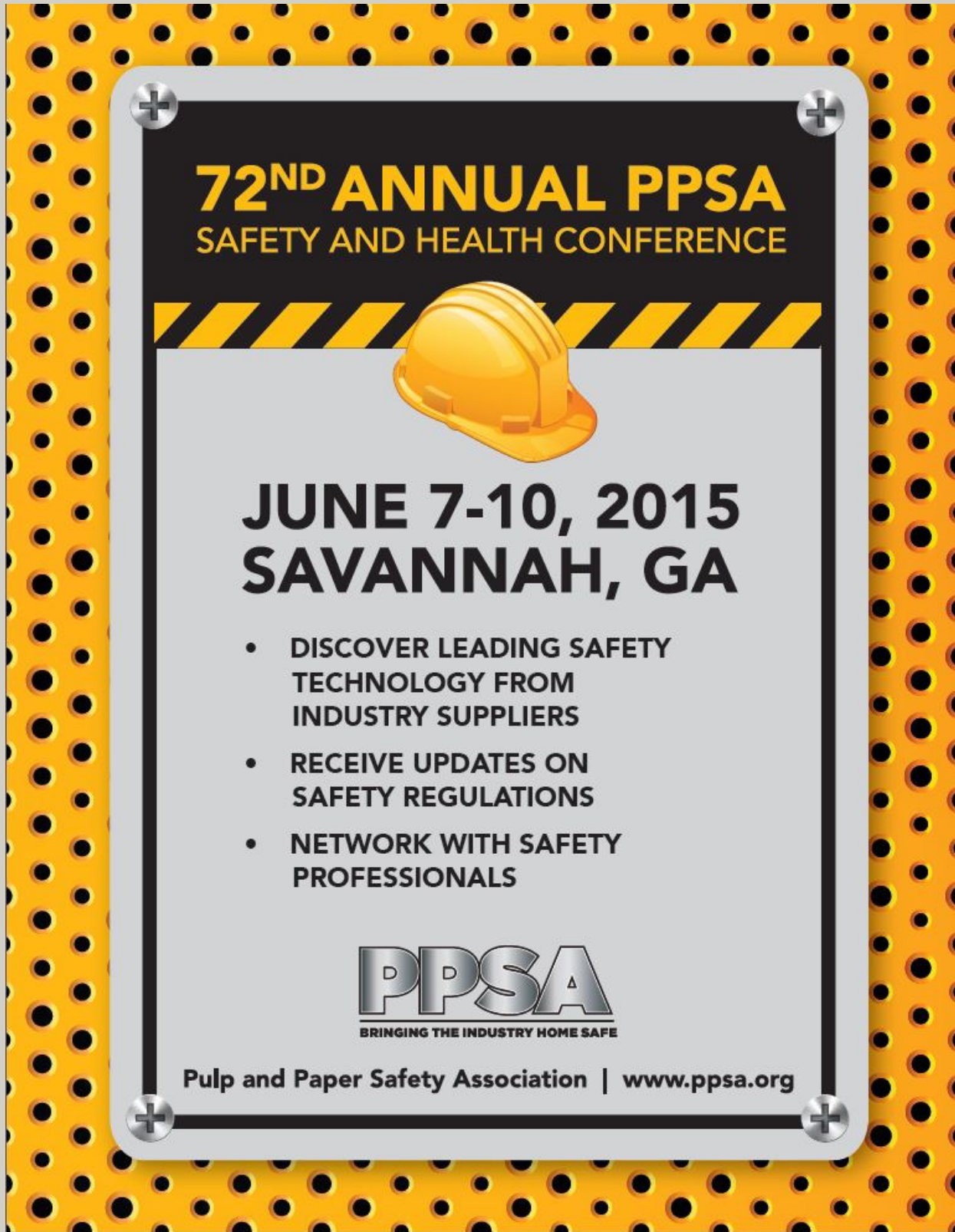
In addition to our upcoming conference, PPSA is pleased to add webinars to our list of member benefits. The Education Committee organized a free hour-long webinar back in November, providing information on OSHA Recordkeeping and regulations. The webinar was a huge success and PPSA will continue to offer online learning opportunities in the future, with a goal of offering one each quarter.

PPSA is also excited to announce the Introduction to Industrial Hygiene course to be held in Atlanta, Georgia, this spring. Please be sure to check our [website](#) for additional information coming soon regarding the course. If you seek training on a particular topic, please let us know and we may be able to help. Contact the Education Committee Chair – Sue Cooper, sue.cooper@weyerhaeuser.com, or Ashley Westbrook, awestbrook@ppsa.org.

Thank you for your ongoing support of PPSA, helping us to bring the industry home safe. We look forward to providing you with the most current safety information throughout the coming year and hope to see you all in June.


Thank You -

Peter G. Masias, CSP
PPSA Board Chairman



The poster is designed to look like a safety sign. It has a black background with yellow text and a yellow hard hat illustration. The text is framed by a white border with four silver screws at the corners. The background of the poster is a yellow and black polka-dot pattern. The text is as follows:

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Getting to Know Our Members

Interview with Larry Richard by Steve Gearheart

How long have you been in your current position?

I have served as President and CEO of Forest Resources since its inception in 1999.

What is your greatest achievement in your safety career?

I am not sure I would call it an achievement, but gaining an understanding of what it means to have a good "Safety Culture", and its importance, is probably the most important thing I have learned over the years.

Can you explain what you mean by good "safety culture"?

I think we have all heard of companies with exemplary safety records as having a good Safety Culture. Dupont and McMillan are two prime examples. We all want to be like them, but I had no idea what a good Safety Culture was, much less how to improve ours.

Maybe because of my engineering background, for the longest time I thought it was enough to engineer a response to an accident (install a guard, modify the equipment), or develop a new procedure, do a little training. Job done. Sooner or later everything will be guarded....

What I have learned from others is the importance of human involvement and mindset in preventing accidents. I can think of several incidents where people have injured themselves, trying to do their job, working around guards previously put in place to prevent just that accident. If we are not thinking safety all the time, safety first, production second, and take the time to do it right, accidents will happen. I am sure everyone sometime loses this focus, and that is where co-worker involvement comes in so important. It is important to have an environment where cautioning each other about potential hazards is expected and accepted.

This type of personal awareness / involvement in safety by all employees is a key characteristic of a good Safety Culture. This is certainly true for companies that reach "world class" safety performance, and maintain it.

How would you describe the Safety Culture at Forest Resources today?

Forest Resources is a collection of formerly independent, stand-alone businesses that have come together over the past fifteen years. I would have to say each one is at a different point along the path to having a good Safety Culture.

Ivex Specialty Paper, our tiny paper mill in Peoria, IL has only 45 employees. The facility is very old, and has far from state-of-the-art paper making and converting equipment. They have gone almost 2000 days without a recordable I incident. I cannot explain this performance other than to credit a good Safety Culture".

Several years ago, when we began a company-wide effort to bring all our companies to "world class" best safety performance, we encountered some skepticism at our two larger, unionized paper mills. I recall sitting across the table making my speech about how to achieve "world class" safety everyone would have to be involved/responsible. The response from across the table was; "No. We are not responsible for safety. You, management, are responsible for my safety." This old school mentality is a great example of one of the hurdles that must be overcome to develop a good Safety Culture.

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Management has responded by invigorating and empowering hourly safety committees.

I am sure a lot of the initial reaction by the unions was a stock reflex to protect their right to grieve safety violation related discipline. If you can enlist their involvement in writing the procedures, investigating accidents, you may still discuss discipline cases, but their involvement is the real objective. We cannot claim to have won all their hearts and minds yet, but we are making progress.

What is your best piece of safety advice?

Think about what you are about to do, for a brief few seconds before you dive into the activity. Perform a mental assessment of risks that could be present. If one comes to mind, step back and rethink.

What are some of your favorite safety tips?

This is for the front line supervisor, where instruction to employees mostly takes place; do your best to find some safety related comment/caution/advice to give to subordinates as often as possible.

Wear boots when working in the woods. Wearing tennis shoes, I stepped off my tractor and turned my ankle on a small stump covered by leaves. A case of not wearing the proper PPE! I have since purchased a new pair of comfortable boots, my excuse for not wearing my old ones at the time. Shame on me!

What is your favorite weekend activity?

I do a lot of wood working; from cutting down the tree, to milling it into lumber, to building furniture. These activities keep me constantly using PPE for one activity or another. It takes commitment to always take those extra few steps to get the ear plugs, the gloves, the safety glasses, whatever is required.

Larry Richard
President and CEO, Forest Resources



Larry B. Richard is currently President and CEO of Forest Resources LLC. He served on the board of Wood Resources LLC, and currently sits on the board of the Pulp and Paper Foundation at North Carolina State University. From 1993 to 1999, Mr. Richard was General Manager of Visy Recycle, a wholly-owned subsidiary of Pratt Industries. From 1980 to 1993, Mr. Richard was a manager with manufacturing and engineering responsibilities at the Macon, Georgia integrated pulp and paper mill under ownership of Riverwood International, Macon Kraft and Georgia Kraft. Mr. Richard received his B.S. degree in Pulp and Paper Science and Engineering from North Carolina State University in 1979.

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Did you know a new OSHA reporting requirement went into effect January 1, 2015?

Submitted by John Deveau, Communications Chair

As of the beginning of this year, there has been a change to what covered employers are required to report to the Occupational Safety and Health Administration. We are now required to report all work-related fatalities within 8 hours and all in-patient hospitalizations, amputations, and losses of an eye within 24 hours.

We have three options for reporting these severe incidents to OSHA. We can call the nearest area office during normal business hours, call the 24-hour OSHA hotline at (1-800-321-6742), or we can report online at www.osha.gov/report_online.

For more information, you can go to OSHA's [Web page](#) for the updated reporting requirements or you can watch OSHA's new YouTube video where Dr. David Michaels, Assistant Secretary of Labor for Occupational Safety and Health, explains the new reporting requirements.

If you are located in a state that operates their own safety and health programs (State Plan States), you should check your state plan for the implementation date of the new requirements. OSHA encouraged the states to implement the new coverage provisions on 1/1/2015, but have stated that some may not be have been able to meet this tight deadline.



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PPSA Safety Recognition Survey Results

In December 2014, the Pulp and Paper Safety Association conducted a survey among nearly 100 pulp and paper companies in North America to determine what proactive safety recognition/incentive programs were used within the industry. Following are the results:

Do you have a safety recognition (incentive) program that is based on proactive metrics/activities?

Sixty-Nine percent of respondents to this question indicated that they had some type of program. Types of programs mentioned included:

- Giving out "safety bucks" for attending voluntary safety committee meetings, offering good safety suggestions or correcting a safety situation, participating in a safety audit, etc. The "bucks" can be used to order items online.
- Quarterly safety challenges, such as "find 4 things wrong with this photo" (8 photos completed in 3 months gets a prize such as a folding snow shovel, an emergency hand crank radio, or jumper cables. Other quarterly challenges have included: safety crossword puzzles, safety quizzes, etc. Some companies also have a millwide prize for reaching 150 near misses reported in 3 months.
- Give away shirts, jackets, and meals to celebrate safety, quality, or production milestones.
- An online system to submit hazard observations, Courage to Care, and Near Misses. Each quarter we also have a mill challenge to submit one or more of these as part of the Millwide Challenge.
- Departmental Safety Committees conduct "meet and greets" with their co-workers. They also celebrate safe days without an injury, with a cookout.
- STEP card participation, safety committee participation, safety audits.

Describe proactive metrics/activities you use.

- Near miss reporting and training completion.
- Percent of employee involvement.
- Customized "Rate Your State" card used by an employee to evaluate his/her own mental state before performing a task. The card also has a Pre-Task Checklist on the back to ensure that everything possible is done to ensure the task is done safely, and there is a goal each quarter to submit a certain amount of these cards as part of the Mill Challenge.
- Safe Days.
- Safety Observations using the SafeStart principles as a guideline.
- Inspections conducted by safety committee members of their own areas.
- Operate recordable injury free and average four 10' Circle of Danger risk assessment cards for a 30 day period.
- Joint Safety Committees that monitor performance against behavior-based safety metrics including: employee participation rate, present at-risk behaviors, reduction/elimination of hazards, safe work procedures, and CAP closure.
- Hourly safety representatives on sites encourage participation in site safety project planning.
- Risk assessments for non-standard work, Job Safety Observations for standard work, Departmental Safety Improvement Projects.

Continued from page 10

- Observation Based Safety monthly targets and individual safety meeting completion rate (on-line, pure safety).
- Near Hit reporting, safety observations, safety inspections, pre-job hazard assessments.

Anything learned that will make programs more meaningful/successful?

- To be eligible for the quarterly bonus employees must complete all of their required training.
- Need to continually come up with different activities to get employees involved, which is difficult.
- Allow employees input on the design of the program.
- The illustration that Chuck Pettinger used at last year's [PPSA] conference was very helpful. Each process we follow is a "Stop Block" to prevent injuries in the workplace. The hierarchy of controls used, observations, interventions, and PPE as a last resort.
- Employee engagement is the key to success, but it takes several years to develop.
- Providing effective training specific to the safety observation process (peer to peer), incident investigations, audit/inspection activity were vital.
- Have to be ready to commit resources at all times.
- Top to bottom buy-in is critical.
- If you focus on proactive risk reduction activities, the incident rate will follow.
- Shift from old lagging targets of recordability. For us it was an exact tradeoff (financially) so the employees did not feel that management was infringing on what they perceived to be an "entitlement." Consider a hard stop on each type of program for evaluation and upgrade if necessary in order to avoid the "entitlement trap."
- Take action on suggestions and get more people to engage in safety discussions.

Any other ideas about proactive safety methods?

- When employees start to see that these activities improve the workplace, they will start to do it for that benefit rather than for the incentive. Feedback on improvements is important.
- We are currently at 300+ days without a recordable injury and participation has increased with each passing month even when the incentive is fixed at a \$30 gift card maximum.
- As most Safety Professionals know, you really need a "Safety Culture" not just a safety program. To reach this level requires trust and demonstration of caring at all levels of the organization.
- Our papermaking crew worked with a local manufacturer's representative to create a more robust cut resistant glove to make doctor blade changes safer. The joint effort proved worthy of celebrating by having the crew share the experience with other areas of the facility.
- Peer-to-peer safety observations have greatly assisted our safety program across our facility.
- We are looking to expand our use of leading safety indicators to near-miss reporting and other items in 2015.
- It's all about a "fair and just" culture. Upper management can constantly share the vision of caring, but if actions don't support those beliefs, it comes across as hypocritical.
- Any proactive employee approach has to be directly supported by management.



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Legal Corner

Submitted by Lawrence Halprin, Partner — Keller and Heckman LLP

Supervisory Misconduct Under the OSH Act and Factors to Weigh in Deciding Whether to Contest OSHA Citations*

Every once in a while, an apparently routine OSHA citation contest evolves into something that is worth examining for the legal precedents that it establishes, and for the guidance it provides to safety practitioners and attorneys on how to manage a safety program, whether to contest OSHA citations, and how to prepare for a citation contest. *Secretary of Labor v. ComTran Group* is such a case.

ComTran is a communications utilities company that was hired to relocate some existing underground utilities and assigned a 2-man crew consisting of a supervisor and a helper to perform this 2-day project. On the first day, the supervisor dug a trench 4 feet deep and placed a spoils pile 2 feet from the edge of the trench, both in compliance with the applicable OSHA requirements. On the morning of the second day, before work began, the project manager stopped by the site, noted that everything seemed to be in order and left the site. The supervisor determine he needed to expand the trench to complete the task and, by the time an OSHA inspector drove by, the unshored trench was six feet deep and had a spoils pile 5 feet high right on the edge of the trench. The inspector did not immediately take action to remove the supervisor from the trench, but instead called in the situation to the OSHA area office, which sent out another inspector to first observe the situation before ordering the supervisor out of the trench. The merits and morality of that approach to OSHA enforcement is an appropriate topic for another article.

OSHA issued citations for lack of shoring in the trench and an improperly located spoils pile. ComTran contested the two citations, apparently on the basis that there was no employer knowledge of the non-compliant conditions or that the non-compliant conditions were the result of the supervisor's unforeseeable misconduct. The Review Commission Judge upheld the citations on the basis that the employer knew of the non-compliant conditions because the supervisor's knowledge of his own misconduct was imputed to the employer. He reduced the proposed penalty from \$9,800 to \$5,000 based on employer "good faith" considerations. The Review Commission denied a petition for discretionary review and, on appeal, the Eleventh Circuit reversed the Review Commission, holding that it is inappropriate to impute a supervisor's knowledge of his own violative conduct to his employer for purposes of determining whether there was a violation of the OSH Act. Accordingly, the Court remanded the case to the Review Commission and directed the Review Commission to hold a hearing on whether ComTran's safety program was so inadequate that the supervisor's violative conduct was foreseeable and knowledge of it should be imputed to the employer.

In determining whether OSHA has established that a safety program is adequate, the Courts and the Review Commission look at the same factors that are considered when the Secretary has made out a prima facie showing of employer knowledge and the employer is attempting to establish the affirmative defense of unforeseeable employee misconduct. They are: (1) Whether ComTran established work rules addressing the cited hazards (conditions or practices); (2) if there was a work rule, whether it was effectively communicated to the affected employees; (3) if there was a work rule, whether ComTran took reasonable measures to discover non-compliance with the work rule; and (4) if there was a work rule, whether ComTran enforced the rule. However, because evidence of a safety program is uniquely in the hands of the employer, the courts and the Review Commission allow the Secretary to pursue reasonably discovery against the employer to obtain all relevant information on these issues. If the employer's response to adequately crafted discovery is deficient, the courts and the Review Commission presume the evidence does not exist, not that the Secretary failed to carry his burden of proof.

The Review Commission hearing on the remanded case provides a case study on what can happen at trial and how those events should be considered in managing a safety program, in deciding whether to contest an OSHA citation, and in preparing for the hearing in a citation contest.

1. Did the Employer Have an Established Work Rule Addressing the Hazard

The decision issued by the Review Commission Judge strongly suggests that ComTran had an established work rule addressing the shoring of trenches and the location of spoils piles in its 2010 Training Materials. However, ComTran was not permitted to introduce evidence of that rule at the hearing because the evidence it would have introduced, its 2012 Training Materials and related oral testimony, did not satisfy "the best evidence rule," which generally provides that an original writing, recording, or photograph is required to prove its content unless the rules of evidence provide otherwise.

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The OSHA inspection took place on December 2, 2010 and the OSHA citations were issued on February 15, 2011. It appears that ComTran did not put an effective litigation hold on the relevant documents. When the 2012 version of ComTran's Training Materials was issued, ComTran discarded the 2010 version, which was the version in effect at the time of the OSHA inspection. While the result may seem harsh, the Review Commission Judge noted that there are exceptions to the "best evidence rule," when: (a) all the originals are lost or destroyed, and not by the proponent acting in bad faith; or (b) an original cannot be obtained by any available judicial process. The Review Commission Judge found that ComTran had over seven months prior to the remand trial to obtain copies of the 2010 Training Materials from the publisher, either voluntarily or through the available judicial process, and made no attempt to do so. Based on that finding, the Judge found that the best evidence rule precluded ComTran from introducing the 2012 Training Materials.

The Judge found that none of the other materials offered into evidence established the existence of a rule addressing the cited hazards in effect at the time of the OSHA inspection. The Judge discounted one training record because there was "no indication in the record as to the creator of that list, when it was created, or any evidence of its accuracy." The Judge discounted the accuracy of other materials presented as evidence of training because, for example, they lacked a date, or the date on the sign-in sheet and the date of the associated training session were four months apart.

2. Whether the Work Rule was Effectively Communicated to the Affected Employees

Because the Secretary established that ComTran did not have established work rules designed to avoid violations of the cited standards, the Judge held that the Secretary also established that ComTran necessarily failed to adequately communicate the required rules. Nevertheless, the Judge proceeded to examine the two remaining factors and find against ComTran on both of them so that ComTran would not be inclined to appeal his decision on the narrower finding that the best evidence rule applied and there was no employer work rule addressing the cited hazards.

3. Whether Comtran Took Reasonable Measures To Discover Non-Compliance With The Work Rule and Enforce the Rule

According to the Judge's decision:

- (a) ComTran admitted that it had never detected or disciplined an employee for a violation of its work rules relevant to the cited conditions.
- (b) ComTran admitted that it had not taken any disciplinary action against the non-compliant supervisor and was waiting for the OSHA citations before taking any disciplinary action against him.
- (c) ComTran took some apparently adverse actions against the supervisor after the OSHA citations were issued, but the supervisor testified that he did not consider them to be discipline for his conduct.
- (d) "The record contains only three lists of verbal warnings allegedly given to employees for minor infractions, which company officials created after OSHA issued the citations in this case."
- (e) ComTran's Safety Manual had only one reference to discipline: "It is the responsibility of management to see that these rules, policies, and programs are carried out, and anyone violating these should be immediately warned as to the dangers [to personnel?] of violating these rules [but not the potential for disciplinary action?]. [Only?] Continual violation of these safety rules, policies, and programs will be considered grounds for dismissal."
- (f) "ComTran admitted that it 'did not maintain a central coordinated repository for discipline records'."
- (g) "ComTran asserted that its 'supervisors maintained file notes in connection with their projects to which they could refer, if necessary,' it did not claim that those 'notes' were used by the Company in any organized way to discover safety violations."

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- (h) ComTran asserted that supervisors maintained “informal file notes” but admitted that those informal file notes were “not formal Company documents.”
- (i) ComTran failed to produce any of those “informal file notes” in response to the Secretary’s request that it produce all evidence of discipline.
- (j) “Other than evidence that ComTran fired an unnamed employee after multiple ‘wrecks,’ there is no evidence in the record that the Company had detected any serious safety violations prior to the OSHA inspection at issue.”

Based on these and additional findings, the Judge concluded that ComTran did not effectively attempt to identify non-compliance with its safety rules or enforce its safety rules.

There are a number of valuable learnings that come out of this case.

1. When a supervisor engages in non-compliant conduct, the more persuasive interpretation of the OSH Act is that it is inappropriate to impute the supervisor’s knowledge of his own violative conduct to his employer for purposes of determining whether there was a violation of the OSH Act. When a case presenting this issue arises, it is important to try to determine the rule on this issue in the U.S. Court of Appeals to which an appeal may be filed.
2. Litigation holds on relevant documents should be utilized in OSHRC citation contests.
3. Evidence of a deficient safety program can be used by OSHA to impute employer knowledge of non-compliant conditions that, in theory, would have been prevented or detected and remedied had the program been adequate.
4. Sites should have a well-written disciplinary policy to address non-compliance with safety requirements. Discipline must be meted out in accordance with the policy. It should never be tied to whether there was an injury or OSHA citation associated with the non-compliant action. In general, undocumented (oral) warnings are likely to be viewed as meaningless.

Lawrence Halprin is a Partner at Keller and Heckman LLP, and a member of the firm’s Workplace Safety and Health, Litigation, Chemical Regulation and Environmental Practice Groups. This article is designed to provide general information on the covered topic. It may not be relied upon in making decisions in this area, does not constitute legal advice, and does not create an attorney-client relationship. The author welcomes comments on this article from interested readers.

Lawrence Halprin
Partner, Keller and Heckman LLP



Lawrence Halprin is nationally recognized for his work in the areas of occupational safety and health, and chemical regulation, at the federal and state levels. His occupational safety and health practice covers all aspects of legal advocacy, including: legislative reform and oversight; participation in OSHA, NIOSH and MSHA rulemakings and stakeholders processes; participation in the development of national consensus standards under the ANSI process, and TLVs under the ACGIH process; bringing and intervening in pre-enforcement challenges to final OSHA rules; providing compliance counseling and training; conducting incident investigations, compliance audits and program reviews; representing clients in OSHA investigations; and defending clients in OSHA and MSHA enforcement actions.

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Safety Attitudes

Submitted by Ed Corlew, Mohawk Fine Papers

Most of us had some type of safety training during childhood. We were taught to look both ways before crossing streets and not to play with matches. As adults, we are warned by others and by the media not to smoke in bed, not to stay out in the sun too long, and not to drive while under the influence of alcohol. And yet, common as these safety rules may be, how many of us can truthfully say that we have never turned a light on or off with wet hands, smoked in bed, gotten a sunburn, or driven home from a party after having a bit too much to drink?

Employees often neglect safety rules because they:

- Are in a hurry.
- Figure accidents always happen to others.
- Are resentful of their supervisors.

Every time employees engage in unsafe acts, they are taking a gamble—betting that an accident will not occur. Is your health, and possibly life itself, worth such a bet?

When employees are aware of safety rules and break them anyway, we say they have unsafe attitudes. Picture a technician who neglects to wear eye protection while working with harmful liquids that could splash the face. Think about a warehouse worker who knows that an object weighs too much to be lifted by one person, but nevertheless attempts to lift it without any help. These employees are demonstrating unsafe attitudes.

Safety officers may give excellent safety orientations, you may know all the safety rules, and you may be able to demonstrate the safe way to do a job. But knowing every safe rule ever written will not protect you if you fail to use that knowledge daily on the job. The habit of doing things the wrong way is difficult to break, but it can be done.

The next time you are about to break a safety rule, stop and think about what could happen to you, your co-workers, or your family. Imagine the pain, the inconvenience, and the lost time and money that could result. Then do the job correctly, the safe way. At first you will be slowed down, but soon you will start to notice safety becoming a habit—and it will turn out to be one of the best habits you have ever had, because it will decrease your chances of joining those who are disabled or killed in accidents each year.

Here are a few basic safety rules that should be practiced again and again until they become automatic:

- Report all accidents to your supervisor, even though they may seem minor at the time. Studying the causes of accidents points out ways in which they can be avoided in the future.
- Practice good housekeeping to prevent slips and falls—your own or anyone else's. Clean up spills, and keep all areas—especially heavily traveled ones—free of clutter.
- Know which types of fire extinguishers may be used safely on each class of fire. Use of the wrong type of extinguisher can cause serious injury. For example, you may receive a serious or fatal shock if you use water on an electrical fire.
- Use good body mechanics when lifting and moving objects. Get help when you need it and let your legs rather than your back do most of the work.
- Wear eye protection when needed: when there may be flying particles or when working with acids or harmful chemicals that might splash.
- Make sure electrical equipment is in good condition before using it. Have defective tools, cords, or other equipment tagged for repair. Do not touch outlets, switches, or electrical equipment with wet hands.

Share your own safe attitude and habits with your co-workers. You'll do this in a tactful way of course, but remembering that it's important for their safety and your own.

No one can say when an unsafe condition or act will result in an accident, when an accident will result in injury, or when injury will cause permanent disability or even death. So we must all resolve to work safely and never take chances with the life or health of ourselves and our fellow workers.



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Close Calls Are Wake Up Calls!

Submitted by Ed Corlew, Mohawk Fine Papers, Inc.

Close calls or near misses are very common in the workplace. They are incidents that don't cause an injury or property damage only because there was nothing in the way to be damaged, or no one was close enough to be injured.

Why talk about accidents that didn't happen? The following story might make it a little easier to understand by bringing a close call incident a little closer to home.

Your neighbor's son runs into your house in a panic because he has just come within a few inches of running over your two-year-old daughter who was playing in the driveway. Your first reaction might be "why didn't you circle check your vehicle before getting in?" However, because it was promptly reported to you, you will now have the opportunity to investigate immediately for its causes.

Upon investigation you discover there is a faulty gate latch on the fence in your backyard play area. If your neighbor's son had neglected or ignored reporting this near-accident to you, you may never have known. This faulty gate could have eventually cost your daughter her life.

The sequence of events, that lead up to an accident, are like a series of errors that fall onto one another like dominoes. The close call incident is simply this same sequence of events with one of the dominoes missing.

Close call incidents trigger the fact that something is seriously wrong. They allow us the opportunity to investigate and correct the situation before the same thing happens again and causes an injury or death.

Experience has proven that if the causes of accidents are not removed, the potential that an accident will occur again and again increases. Unfortunately, a typical story told after many accidents is; "Yeah, that happened to Jim too - just last week!"

Why are close call incidents not reported? Typical reasons are: fear of reprimand or repercussions, red tape, not being aware of their importance in controlling future accident, embarrassment, the spoiling of a safety or production record or lack of feedback when similar issues have previously been raised.

If you keep silent about a close call - you may avoid having to deal with it. But try to explain that to a co-worker who ends up in a wheelchair, because of a hazard that you knew existed but were too proud to talk about.

Controlling close call incidents is really the secret to reducing the overall frequency of accidents. A survey of 300 companies discovered that for every 600 close call incidents, they had 30 property damages, 10 minor accidents and 1 very serious accident.

Close call incident reporting is a very valuable tool in helping us all manage an effective safety program. The vital key is to apply corrective action immediately. The only way this can be done is if a close call is reported immediately after it has occurred. This way we can learn as much as possible - as soon as possible.

A wise man once said: A fool is not a man who makes no mistakes - we all do that. The fool is the man who refuses to learn from them.



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Power Tool Safety

Submitted by Steve Gearheart, Hartford City Paper

Power tools are an essential part of our everyday life to perform difficult tasks for maintenance upkeep and repair of equipment in nearly every industry and also at home for the do it yourself person.

These tools can be hazardous if not properly used and maintained and have the potential to cause serious injury.

Statistics show that approximately 400,000 people visit the emergency room annually for power tool related injuries.

The 3 most common power tools injuries come from:

- Nail guns, approximately 37,000 injuries a year.
- Chain saws, approximately 36,000 injuries a year.
- Table saws, approximately 29,000 injuries a year.

Help yourself and employees from becoming a statistic and reduce the risk of injury by following these recommendations:

- Wear the proper Personal Protective Equipment. Consult with the operator's manual for proper PPE recommendation of each tool.
- Inspect power cords for wear and damage such as cuts and tears that expose inter wiring damages and replaced by a qualified technician as needed.
- Do not splice or tape damaged power cords.
- Remove power cords from electrical receptacles properly to prevent cord damage.
- Ensure that the grounding prong is in place on all power cord plug in.
- Do not use a power tool if the housing is cracked or damaged.
- If an extension cord is needed for power tools, ensure that the extension cord is not undersized.
- If you notice a burning odor while using the tool, immediately stop using the tool and have it inspected by a qualified technician.

Continued on Page 20

Continued from Page 19

- Do not use electric power tools in environments that create hazards, such as rain, standing water, etc.
- Use the tool as it is intended to be used.

Altering or using hand tools in a manner that is not recommended by the manufacturer can also lead to injury. Read and follow the instruction manual.

Ensure that you and your employees follow OSHA guideline for power tools:

29 CFR 1910.241 - Definitions.

29 CFR 1910.242 - General requirements.

29 CFR 1910.243 - Addresses guarding of portable powered tools and established regulations.

Encourage all employees to follow the manufacturer's recommendations when using power tools and to wear the recommended PPE for each power tool at work, for home maintenance and also home hobbies such as wood working. Following these and other safety recommendations will help prevent injuries when using power tools.



These four states...

- ☐ Rushing
- ☐ Frustration
- ☐ Fatigue
- ☐ Complacency

can cause or contribute to these critical errors...

- ☐ Eyes not on Task
- ☐ Mind not on Task
- ☐ Line-of-Fire
- ☐ Balance/Traction/Grip

...which increase the risk of injury.

Compliance will only take you so far with injury prevention.

To get to zero injuries and stay there, you must address the *human factors* that are involved in the majority of incidents and injuries. Learn how SafeStart fits within your existing safety system to help you achieve this goal on and off-the -job.



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Vibration: An Occupational Health Hazard Often Overlooked in the U.S.

Timothy M. St. Pierre, MPH, CSP, COHC

The European Union (EU) has accelerated their development of regulatory standards for exposure to vibration from use of tools and machinery. While federal regulation in the US is virtually non-existent, non-governmental organizations such as the American Conference of Governmental Industrial Hygienists (ACGIH) have provided guidance regarding both hand-arm (HAV) and whole-body vibration (WBV). In addition, we can rely on the standards from the EU, as well as literature on vibration to make recommendations. Employee complaints or an excess occurrence of work-related injuries may signal a vibration problem in your workplace. Consider performing a review of whether a need for monitoring and control of vibration in your workplace as a proactive method to reduce some types of common work-related injuries is needed.

What is Vibration? Vibration occurs when a body moves back and forth due to internal and external forces. This is defined or measured by magnitude and frequency, or the amount in a given time frame the body moves back and forth. Frequency is most often expressed in movements per second or Hertz. Magnitude is typically measured in acceleration, as m/s^2 , and most guidelines or regulatory bodies provide standards based on an eight hour average acceleration (A (8)).

Figure. 1 Health Effects Linked to Vibration Exposure

Hand-Arm Vibration	Whole Body Vibration
Raynaud's Phenomenon of Occupational Origin Tingling, Numbness, Sensitivity, Dexterity Carpal Tunnel Syndrome Muscle weakness, Pain in the arms/hands Osteoarthritis, ossification, tendonitis, and Dupuytren's contracture	Low back pain Herniated disc Early degeneration of the spine Lumbar disorders

How do I know if my organization has a vibration problem? An excess occurrence of some of the syndromes listed in Figure 1 may be the first indicator of a problem. However, many of these conditions can take years to fully develop and so may not be immediately apparent. Older vehicles, tools and motorized operated equipment tend to create more vibration to the user. Some manufacturers have vibration data available for their equipment, which can be a valuable resource for obtaining a baseline for your machinery. Assessing your organization's equipment condition on a regular basis, and keeping with regular scheduled maintenance helps keep equipment in the best working condition.

In the Paper and Pulp Industry, vibration exposures may occur at periods throughout the papermaking process. In the pulp mill, sources of vibration exposure include delivery of wood

chips, operation of digester, knotters/washers, kilns & furnaces, as well as pressing and drying of pulp. Raw wood preparation prior to use in the mill requires the use of heavy equipment and hand tools. Once the paper product is complete it is packaged for shipment and sent to customers. Warehouse operations such as forklifts, pallet trucks, loaders, conveyors and semi-trucks are sources of vibration exposure to operators. Figure 2 and Figure 3 from the EU Guide to Good Practice on HAV and WBV demonstrate the range of vibration levels from various types of machinery.

Figure 2. Sample Vibration Acceleration Values for Hand Held Power Tools

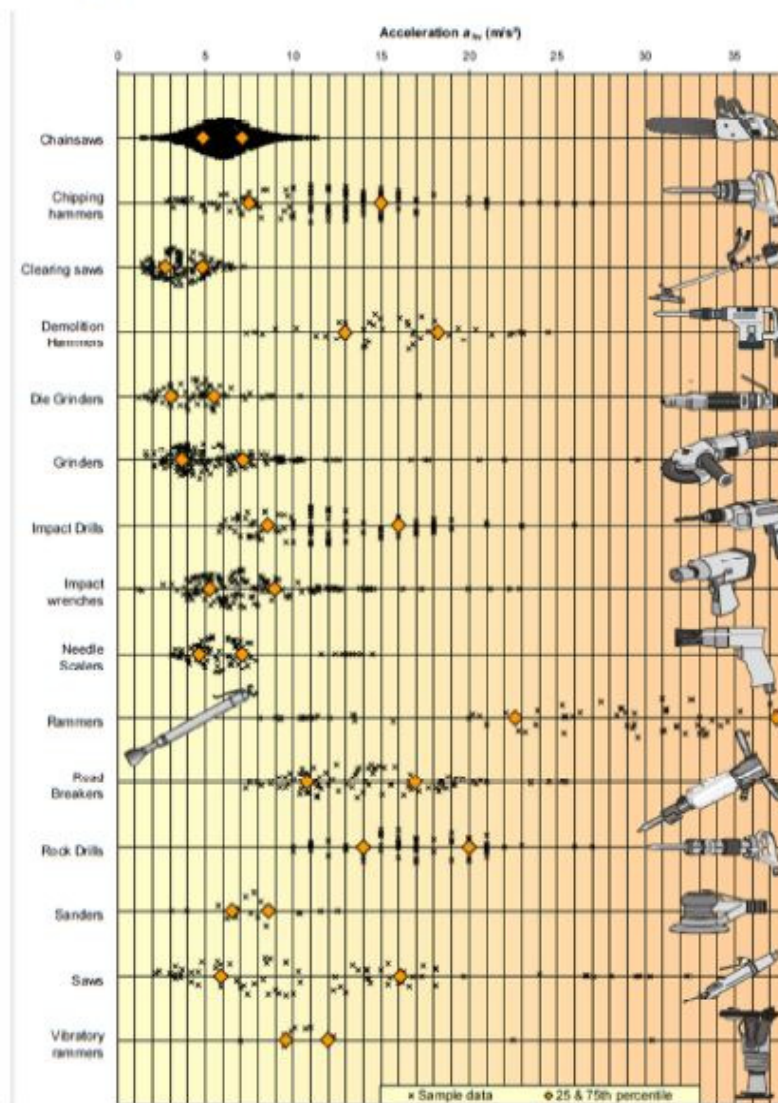
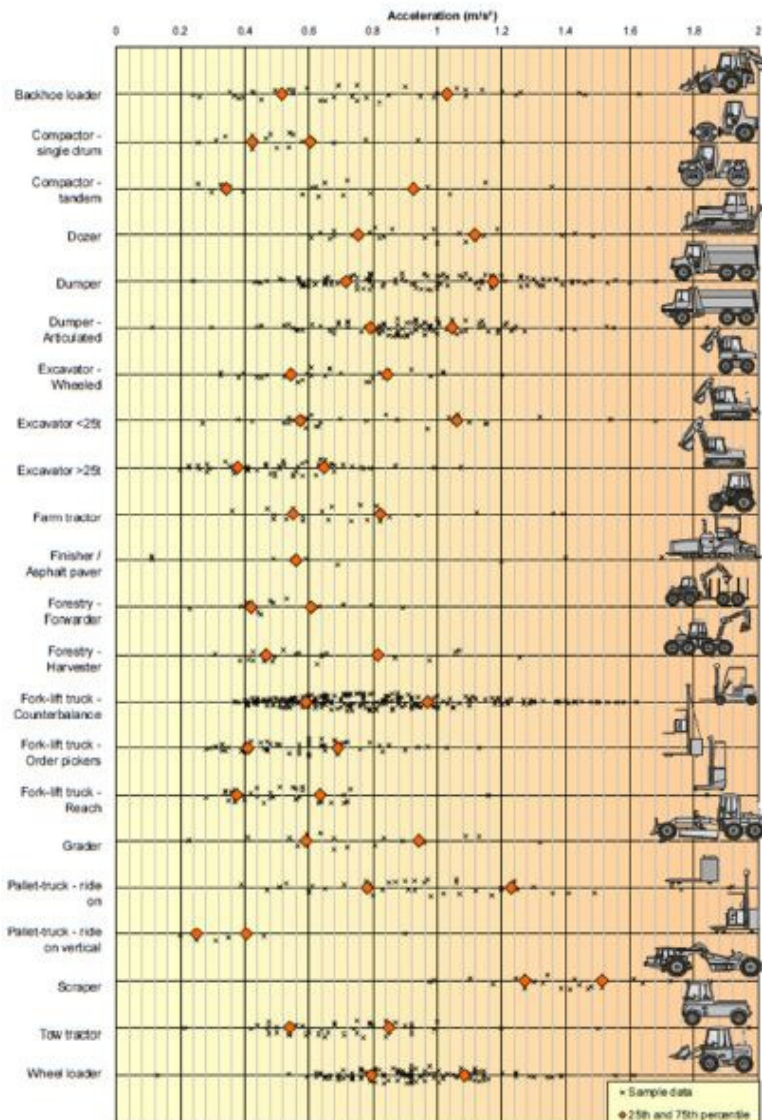


Figure 3. Sample Vibration Acceleration Values for Operator Driven Vehicles



How can my organization assess the vibration on an operator from equipment? Qualified industrial hygienists monitor for HAV and WBV using measuring equipment which complies with ISO 8041:2005. WBV is obtained through aligning a rubber pad containing gyroscopic transducers with the X, Y and Z axes on the seat, or standing position of the machine operator. Likewise, HAV is obtained through aligning a transducer with the relative X, Y and Z axes of a tool and attaching either directly to the handle or hand of the operator.

The EU provides a regulatory standard of 5 m/s^2 for HAV and 1.15 m/s^2 for WBV with action levels at 2.5 m/s^2 for HAV and 0.5 m/s^2 for WBV. The HAV is compared to the A(8), expressed as the square root of the sum of the squares (rms) (total value) of the frequency-weighted acceleration values. The WBV is compared to the calculation of the highest root mean square value, or the highest vibration dose value of the frequency-weighted accelerations, determined on the X, Y, and Z axes (Directive 2002/44/EC – vibration). The TLVs ACGIH recommends for HAV and WBV are nearly identical to the EU, but separate in derivation. ACGIH calculates HAV by comparing the measured root mean square accelerations from the X, Y and Z axes to the TLV over an eight hour equivalent time [A(8)]. To calculate WBV, ACGIH calculates the root mean square for each axis using a frequency weighted formula. An overall weighted root mean square acceleration is calculated using the result from each frequency weighted axis formula, this total is compared to the WBV action level.

What can be done to reduce vibration exposures? A multi-faceted approach may be required, and as with other safety programs a proactive approach reducing exposures before they occur is always the best option. This can be accomplished through ensuring that tasks are performed properly, using proper equipment, designing and maintaining workspaces and equipment with the intent of reducing vibration, training workers in risk reduction techniques and possible hazards, and providing personal protective equipment such as shock absorbing gloves or suspension seats. If your organization does not currently maintain vibration standards or review vibration exposures as part of its health surveillance program you may benefit from developing a program to better protect the health of your workers.

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- Proceedings of the Second American Conference on Human Vibration. Chicago, IL. June 4-6, 2008.

By: Timothy M. St. Pierre, MPH, CSP, COHC

Title: Vibration: An Occupational Health Hazard Often Overlooked in the U.S.

Company: Sandler Occupational Medicine Associates, Inc. (SOMA)

Contact information: Carol Woodruff, cwoodruff@somaonline.com

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► CASE STUDY

WEYERHAEUSER MILL
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THE CHALLENGE

The Weyerhaeuser Columbus Cellulose Fibers plant in South Lowndes County, MS, the company's largest Mississippi operation, had an onsite contractor orientation system that created several challenges for the mill's Safety Management personnel, according to Benjy Bruce, the mill's Safety Manager.

The mill utilizes about 1,500+ contractors for the annual outage. Like most mills, contractors are required to complete safety orientation prior to the outage.

Given the large contractor workforce needed for these outages, they could not be trained in any existing facility at the mill. The safety management team was forced to set up a training facility for a 2-3 week period in an offsite building. The pre-use prep work for the facility and the extra staffing to operate the facility added additional cost to every outage.

The Columbus mill had traditionally required contractors to view a PowerPoint presentation and watch a video which explained their contractor safety program. This would typically take 1-2 hours per class.

The Safety Management team also had to commit personnel resources to administer and proctor tests, review and audit files, keep content updated and also produce reference material. The cost of developing and maintaining their own contractor management system was completely absorbed by the mill.

In addition to the expenses the mill incurred, there were also costs for the contractor firms. In many cases, the contractors would have to arrive at the mill prior to the outage to complete the mandatory contractor orientation. This created additional travel costs and expense.



You have to be continually moving forward on safety training and programs. Standing still is the same as moving backward.

BENJY BRUCE
WEYERHAEUSER SAFETY MANAGER

THE SOLUTION

The mill rolled out the TAPPI SAFE orientation program in August 2013, for its contractors and unescorted visitors. Providing online training through TAPPI SAFE has allowed the mill to eliminate their contractor safety orientation costs and commit more time to safety management within the mill. The overall costs from the contractor firms have also been reduced, as

travel for training has been largely eliminated. Because it's completely web based, he/she can access it 24/7, print out the results and arrive at the mill ready to work. They have been able to use the TAPPI SAFE database reporting tools to instantly track and verify contractor compliance.

The Weyerhaeuser CCF orientation using the TAPPI SAFE program involved:

18+ months
129 contractor/supplier companies have trained
2,500 student participants

THE RESULTS

Since the implementation of the program at his mill, Benjy Bruce now reports that "TAPPI SAFE is a HUGE help." Having expected some cost and time savings when he first became aware of the program, Benjy originally felt that proctoring was still a necessary component of the training

process. But, after becoming more familiar with the program and materials, he has grown more confident with the ability of the online system to provide the safety orientation contractors needed. He adds that the "TAPPI SAFE Basic Orientation is an outstanding course."

► MILL STATS

WEYERHAEUSER'S COLUMBUS
OPERATION

Recognized and benchmarked by the company's cellulose fibers business, first integrated pulp and paper facility to achieve Star status in 1993 and have successfully remained a Star facility by passing each of the required recertifications since. Columbus employees have reached the one-million-safe-work-hour milestone 11 times, including one stretch of 5.6 million work hours over a four and one-half year period.

— Courtesy Weyerhaeuser

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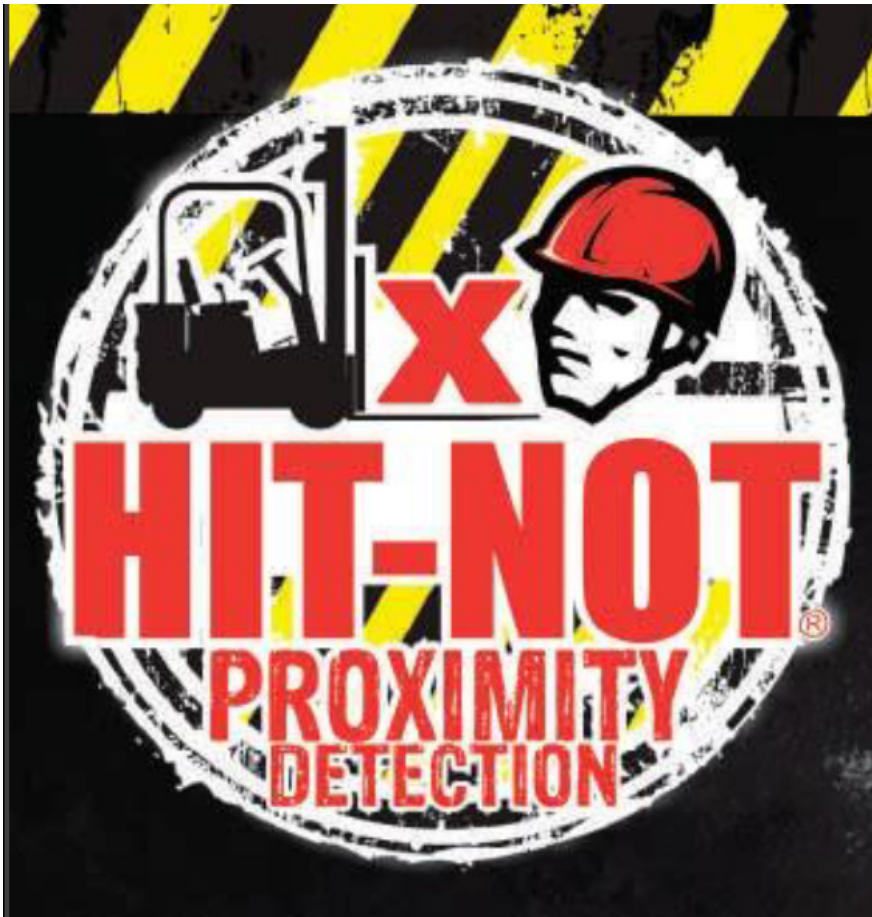
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Mohawk Fine Papers, Inc.
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Steve Gearheart

Hartford City Paper
501 S. Spring Street
Hartford City, IN 47348
765-348-5440
steveg@hcpaper.com

Tim Kubly

Rite-Hite Corporation
8900 North Arbon Drive
Milwaukee, WI 53233
414-362-3706
tkubly@ritehite.com

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MWV
501 South 5th Street
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804-444-7052
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Brady National Accounts
1813 Beekman Street
Daniel Island, SC 29492
843-259-0975
shawn_powell@bradycorp.com

Ad-Hoc

Paul Bierley

Domtar
100 Center Street
Johnsonburg, PA 15845
814-965-6263
paul.bierley@domtar.com

PPSA Staff

Eric Fletty

Executive Director
15 Technology Parkway South - Suite 115
Peachtree Corners, GA 30092
Main: 770-209-7300
Direct: 770-209-7535
efletty@ppsa.org

Ashley Westbrook

Member Relations Manager
15 Technology Parkway South - Suite 115
Peachtree Corners, GA 30092
Main: 770-209-7300
Direct: 770-209-7284
awestbrook@ppsa.org

PPSA is a non-profit, non-political, international organization, devoted to safety throughout the paper industry. From forest products to paper mills, to converting plants, to recycle collections centers, our membership is grouped by category to ensure a fair and appropriate basis for comparison.

The association began in the 1940's as the Southern Pulp and Paper Safety Association, later changing the name to reflect our widening membership base. We currently have members throughout the United States, Canada and other countries. We work to promote safety, to set reasonable and attainable goals, to educate our members, and to give the members a forum for discussion.

Membership in the Association is by operating facility, such as a paper mill, box plant, sawmill, woodlands, etc. Approximately 380 operating facilities are currently members. Annual Membership is based on employee numbers. We also welcome supplier members as well.

Membership in the Association has many advantages:

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