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Our thoughts are with all the residents affected by the recent natural disasters around the world.

A Letter From Our Chair

Matthew Kanneberg
Director of Safety & Health, Paper Solutions
WestRock



Thank you for your ongoing support of the PPSA. Our association plays a vital role in the success of our industry and your support fuels that success. Our board and member supported committees continue to work on bringing value to our members. Here are just a few recent activities to share:

The two-day Industrial Hygiene Course held September 16-17 near Atlanta, GA was a success. Thanks to EnSafe for their technical guidance and support of our association!

The Conference Committee has begun the initial planning for the 2016 PPSA Safety Conference that will take place on June 5-8 at The Battle House Renaissance in Mobile, Alabama. They are in the process of developing an agenda and evaluating speakers.

The Awards Committee is assessing additional ways to recognize key leaders and leading metrics that drive our industry towards safety excellence. Stay tuned for more information on some upcoming individual awards and recognition opportunities.

The Education Committee maintains its efforts to seek out continuing education opportunities through course offerings and webinars. We are evaluating potential course and webinar topics that will bring value to our members.

The Communications Committee did a great job on this quarterly report. The committee has worked hard over the past year to improve the content and quality of the website and quarterly reports.

Did you know...the PPSA Board of Directors meets face-to-face three times a year for a multi-day planning and development meeting? The board and supporting committees conduct monthly conference calls to work on action plans and focus areas to ensure we bring value to our members. If you have an interest in getting more involved in the PPSA – please contact Ashley Westbrook at AWestbrook@ppsa.org.

We hope you plan to visit us at The Battle House Renaissance in Mobile, Alabama June 5-8, 2016 for our 73rd annual safety conference for what promises to be a unique learning experience. Our sessions cover a wide variety of topics including skills that can improve working relationships and insights that help us prevent errors. We will also benefit from case studies in our industry that provide valuable information to improve workplace safety. The PPSA conference will provide updates on the constantly evolving safety regulatory environment. It also represents a unique opportunity to learn about leading edge safety technology from industry suppliers, and network with a large group of safety professionals. It's not too early to SAVE-THE-DATE!

As always, we appreciate your feedback and suggestions on how to make the association better and on what ways we can better serve your needs. Once again, we sincerely appreciate your support!

Best Regards,



Matthew Kanneberg, PPSA Board Chair

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Compressed Air Safety

Many workplace injuries have occurred because of the misuse of compressed air. Using it for personal cleaning or horseplay with the hose, however innocent it may start, can end with the most disastrous consequences. It may be quick and easy to dust your cloths off or it may be amusing to direct a jet of air at a fellow worker but it can actually produce severe internal injury that may result in death. It is extremely important to understand the hazards and rules when it comes to using compressed air safely in the workplace.

HAZARDS

Filings, chips, shavings, particles, paper, etc. are blown up when compressed air is used for cleaning purposes. The pressure necessary to remove the particles from machines and surfaces is also strong enough to blow them into the eyes, ears or skin. The greatest danger in dusting one's self down lies in accidental internal injury to the body. Compressed air can enter the body where the skin is not present (i.e., ear, nose, or any scratch or puncture in the skin, however small) and can cause the affected part to swell to alarming proportions and accompanied by severe pain. If the air gets into the bloodstream it can make its way into the small blood vessels of the brain, burst the vessels and cause death. A pressure strong enough to dust or clean is strong enough to reach the skin and penetrate the body. Even a pressure as low as 5-10 pounds per square inch (psi) can cause serious injury.

RULES

Due to the serious injuries caused by compressed air, OSHA requirements pertaining to the safe use of compressed air for cleaning purposes focus on pressure and chip guarding. The federal OSHA requirement can be found in 29 CFR Part 1910.242(b), which states, ". . . Compressed air shall not be used for cleaning purposes except where reduced to less than 30 psi and then only with effective chip guarding and personal protective equipment."

This regulation only relates to cleaning objects or items, **NOT PEOPLE!** The phrase "reduce to less than 30 psi" means that the nozzle pressure or opening of a gun, pipe, cleaning lance etc., used for cleaning purposes will remain at a pressure level below 30 psi in the event the tool is dead ended— meaning, if the tip of an air gun is blocked. This can be achieved by relief ports that discharge sufficient air to reduce the air pressure at the nozzle to less than 30 psi. Under NO CIRCUMSTANCE should employees use compressed air to clean themselves or clothing while they are worn.

The phrase "effective chip guarding" means any method or equipment that prevents a chip or particle (of any size) from being blown into the eyes or unbroken skin of the operator or other workers. Effective chip guarding may be separate from the air nozzle as in the case where screens or barriers are used.

Our safety rule H&S 0-014-02, General Safety Rules, article 8 states " Employees must never use compressed air to clean their clothing or person, and the air hose should never be pointed at anyone. Compressed air is to be used on designated jobs only."

Commonly Asked Questions

- Q. *Can compressed air greater than 30 psi be used for industrial purposes?***
- A.** Yes, most pneumatic tools, including air guns require 80–120 psi to operate effectively and to do useful work. However, they must have a relief device or air port within the system that will drop the pressure to under 30 psi if the air-system becomes dead ended.
- Q. *If I reduce the air pressure to less than 30 psi can I permit my employees to clean their clothing and/or***
- A.** No, under no circumstances may employees use compressed air to clean off clothing or any part of their body. Pressures as low as 5-10 psi have been known to cause serious injury.



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Legal Corner

THE OBLIGATION TO REPORT AN INJURY: LACERATION, AMPUTATION OR AVULSION?

Submitted by Eric E. Hobbs and Charles B. Palmer

When Do You Have to Report an Injury to OSHA, and Will You be Inspected?

As all employers know by now, starting in 2015, OSHA requires reporting of amputations, as well as hospitalizations of one or more employees or the loss of an eye. This change has substantially reduced the threshold for reporting injuries to OSHA and has significantly increased the number of reports and OSHA inspections triggered by those reports.

One of the more challenging requirements of the newly-revised reporting rule for employers is determining whether a finger cut qualifies as an “amputation”. During the rule-making process, many commenters offered their concerns over whether an injury would require a loss of bone in order to constitute a reportable “amputation”. Ultimately, OSHA determined that loss of bone should not be a requirement and that the loss of a tip or fleshy part of the finger would be enough to require a report.

So how does OSHA define “amputation”? According to its rule, “an amputation is the traumatic loss of a limb or other external body part. Amputations include a part, such as a limb or appendage that has been severed, cut off, or amputated (either completely or partially); finger-tip amputations with or without bone loss; medical amputations resulting from irreparable damage; and amputations of body parts that have since been reattached. Amputations do not include “avulsions, enucleations, degloving, scalpings, severed ears, or broken or chipped teeth.”

Of course, most employers are not doctors. Understanding the difference between an “avulsion” and an “amputation”, therefore, can be difficult. Merriam and Webster define “avulsion” as “a forcible separation or detachment: as a tearing away of a body part accidentally or surgically.” So is the distinction that an avulsion is a “forcible ... tearing away” and an “amputation” a “cutting away”? Unfortunately, OSHA’s definition is not so refined.

In fact, OSHA has not done a very good job of differentiating the two at all. The newly-revised reporting rule’s language actually confuses them. So OSHA simply advises employers that they should look to the doctor’s diagnosis in any particular case. But employers still are left in a terrible spot because doctors often use “amputation” and “avulsion” interchangeably when describing the loss of the fleshy part of a finger tip.

Continued on page 12

An employer has 24 hours to make a report to OSHA once it “learns” that an employee has suffered an amputation. Therefore, if the medical report says amputation, the clock starts when the employer learns of it. Unless that diagnosis is changed to avulsion during the next 24 hours, the employer will be exposed to a citation for a failure to report within the 24-hour period, as required by the rule. And if the employer courageously determines, despite the doctor’s diagnosis, that the injury was really an avulsion, rather than an amputation, OSHA will be certain to second-guess that determination if it discovers during any inspection in the next six months that the employer did not make a report.

Will a Report of an Amputation Trigger an OSHA Inspection?

OSHA has a National Emphasis Program to identify and to reduce workplace machinery and equipment hazards which are causing or likely to cause amputations. A report of an amputation is likely to trigger an OSHA inspection, but that likelihood is much greater where the amputation is described as having involved machine hazards.

So what is an employer to do? In the event an amputation is caused by, for example, something falling on the employee’s hand, rather than a machine guarding failure, the employer should make that clear to OSHA when reporting. Doing so may reduce the likelihood of an inspection.

When OSHA receives a report of an amputation, the Agency either will perform an inspection or will send correspondence to the employer asking the employer to conduct a self-investigation and root-cause analysis and report back to OSHA. OSHA calls the latter approach a “Rapid Response Investigation”, or “RRI”. Which of the two paths OSHA chooses, inspection or RRI, will depend upon a list of criteria that appear in the Agency’s enforcement memorandum to its area offices, the resources available to OSHA (is a compliance officer available to respond?), and how the employer communicates with OSHA (has the employer responded quickly, thoroughly and effectively, and what has it reported?).

Certain of the criteria OSHA uses to triage injury reports are sure to trigger an inspection (like a fatality, an injury to a minor, the applicability to the employer of a national emphasis program, the employer’s history of injuries or status as a “repeat offender”, etc.). Other criteria may or may not trigger an inspection (like an injury to a temporary worker, continued exposure of other employees, apparent failure of the employer’s safety program, the employer’s prior inspection history, etc.). And no inspection will be conducted where the injury should not have been reported in the first place because it did not meet the rule’s requirements. The area director of the office receiving the report has a great deal of discretion in determining how that report will be handled.

Continued on page 13

Continued from page 12

If OSHA chooses to send an “RRI” letter to a reporting employer, asking that the employer conduct a self-inspection and root cause analysis, we urge the employer to be very careful in providing information to OSHA that might set the stage for an inspection or even a willful citation down the road. OSHA includes with its RRI letter a form that requires all sorts of information, including confidential information on employees and witnesses, a root-cause analysis and measures the employer has taken and will take to protect against recurrence. All such information, the employer should be aware, “may be used against it”, in the immediate case or down the road.

We recommend that the employer in such a case not use the “non-mandatory” form and that the employer not post the letter as “requested”. OSHA has no authority to require posting, and posting can simply make a bad situation at the workplace worse. In addition, we recommend that the employer not represent in its response that it conducted a root-cause analysis (a response to the letter generally is required within five days, and genuine root-cause analyses often take much longer than that). And we recommend strongly that the employer work with its lawyers to fashion language for the response that avoids concessions of error or promises of action.

If an injured employee is transported to the hospital, the employer should understand that a hospitalization – that is, “a formal admission to the in-patient service of a hospital or clinic for care or treatment” – or an indisputable diagnosis of amputation, will require a report to OSHA, and the employer should presume and act like the report is likely to lead to an OSHA inspection. An investigation of the injury should be commenced immediately to diagnose causation and to identify any potential OSHA violations. The more quickly correction is made, the less likely an inspection is to occur or, in the event it does, the less likely a citation is to issue.

An injury investigation under such circumstances, if directed by legal counsel, is likely to constitute attorney work product protected from disclosure in litigation or government inspection. Drafts of the report and changes that are made will not have to be disclosed to OSHA in the event of an inspection – or an RRI. Interaction with competent legal counsel and safety professionals following a reportable incident can significantly reduce the likelihood of a costly OSHA inspection, improve the employer’s ability to defend itself if an inspection occurs, and help prevent future incidents.

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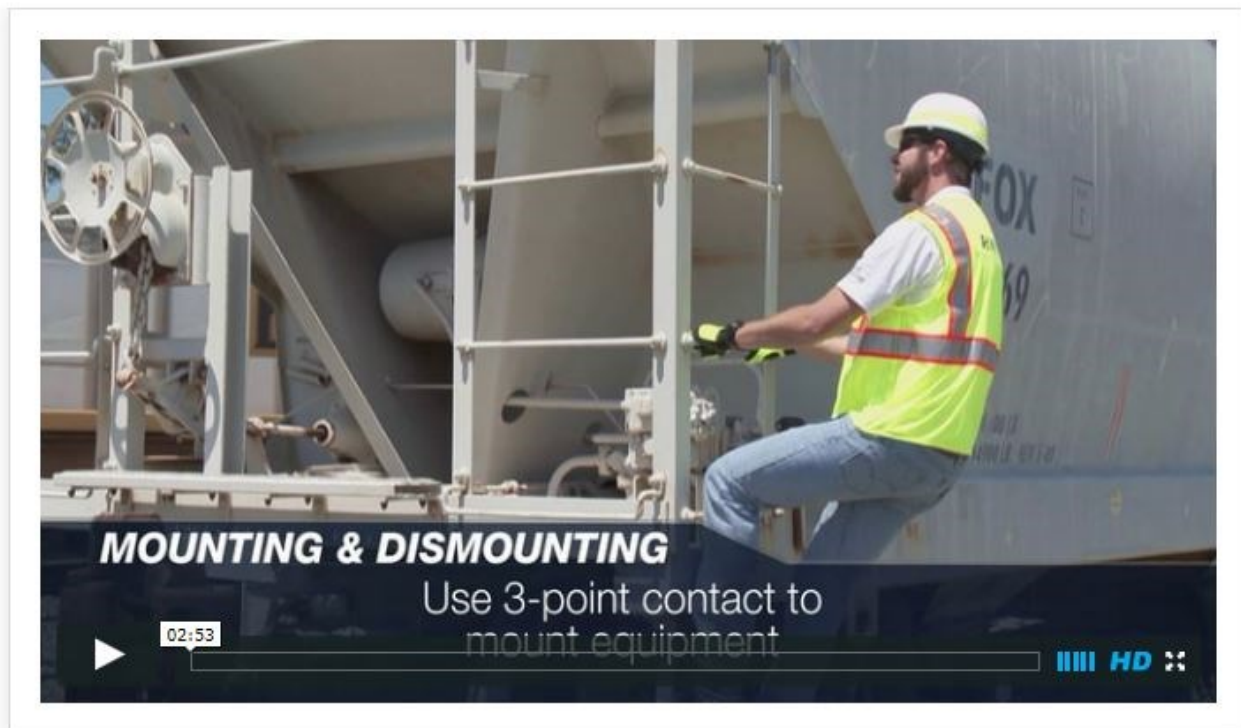
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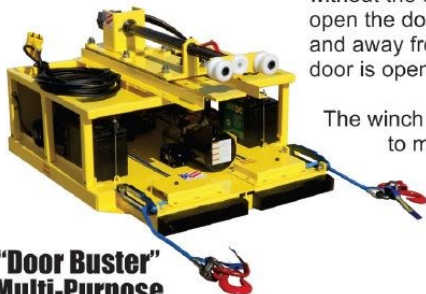
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Can you find the hazards?

Submitted by: John Deveau

I came across this fun little hazard recognition game in a CONN-OSHA quarterly newsletter. We all attempt to train our employees in hazard recognition. It is the most important element when we write our hazard recognition documents. No matter what you call the program you are using, (HRA, JHA, JSA, etc.) the main purpose is to try and identify all the hazards and implement methods to minimize the severity of a potential hazard. However, if the hazards can't be identified you are just going through the motions and really don't have a program.

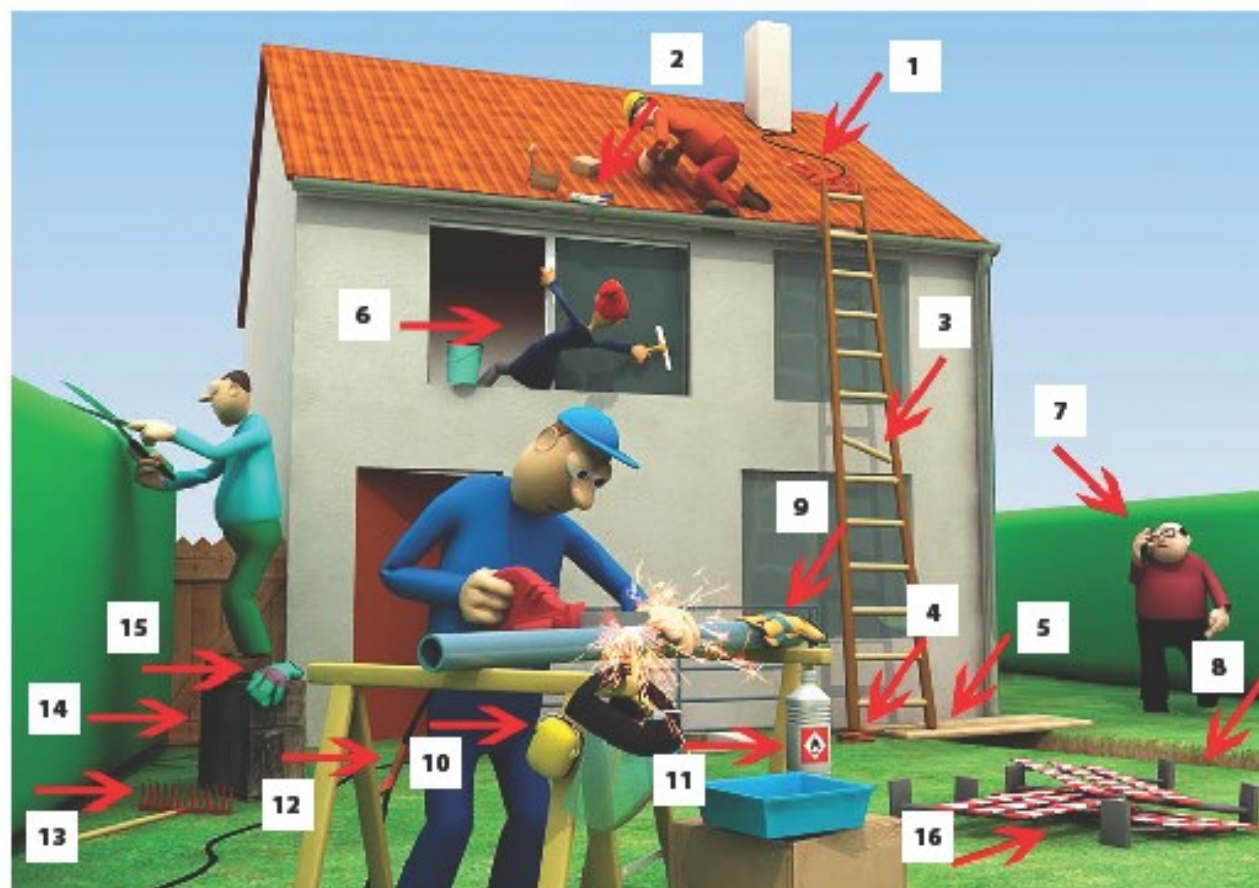
There are many companies and organizations that have subscriptions to such a program. In fact, you can simply type “What is wrong with this picture” or “spot the hazard” into your search engine and find multiple training opportunities in which most are at no cost.

These are fun little games that you can use to build confidence in your safety committees and leadership teams. When you feel your teams have the basics down, I encourage you to expand this by going out into your work place and taking a few photos or recording short video clips with the purpose of identifying as many hazards as they can find. You and your teams just might be surprised at what you come up with. I recommend establishing a “no fault or blame process” if you choose to use your work place photos / videos. You may use the findings to increase awareness and increase your site safety.

Go ahead and try to identify how many hazards you seen below. As a hint, they identified 16 but I missed a couple and found a couple they didn't list.



Can you find the hazards? Napo is an original idea conceived by a small group of OSHA communications professionals. Try the Napo hazard hunt— For more information, go to <http://www.napofilm.net/en/napos-films> (see page 21 for answers)



- 1) Worker on roof (not harnessed), harness tied to the chimney which is not a proper anchor point.
- 2) Tools balancing on roof – likely to fall.
- 3) Rung broken on ladder – risk of falling.
- 4) Ladder balanced on uneven surface – risk of falling.
- 5) Ladder propped across another uneven surface – risk of falling.
- 6) Napette (not harnessed) leaning out of window to clean it – risk of falling.
- 7) Boss on phone on construction site. His attention is diverted and he will not identify hazards as easily.
- 8) Ditch (trip hazard) not marked.
- 9) Napo not wearing the available protective gloves.
- 10) Napo not using the protective hearing equipment available.
- 11) Sparks near to flammable liquid – risk of fire.
- 12) Cable is a trip hazard (repaired with adhesive tape).
- 13) Trip hazard with the tool (rake) left on floor.
- 14) Balancing on wooden box instead of using a proper leader – risk of falling.
- 15) Not wearing the available protective gloves.
- 16) Trip hazard left in middle of lawn.

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Keep Emergency Exits Clear

Submitted by: Ed Corlew

How fast could you get out of your building in case of fire or another emergency? Do you know which exits to use? Your life could depend on knowing where emergency exits are located and making sure they are never blocked.

Many workers in a food processing plant lost their lives because exits were not only blocked but also locked. Many of the workers died trying to beat down the very doors which should have taken them to safety.

You might think this is an extreme example of company carelessness, and that it has nothing to do with you. You're wrong. It is everyone's responsibility to make sure all exits remain free at all times.

Have you ever been tempted to stack materials in front of an exit - even just temporarily? Have you ever moved furniture and equipment in front of the fire exits - just long enough to rearrange or clean your work area? Have you rationalized these actions by thinking that if anyone had to escape; they could simply crawl over the pile, or just squeeze past the item you have parked there?

It is up to everyone to make sure emergency exits are never blocked.

If emergency exit doors must be locked to maintain security, they should be locked from the outside only so anyone inside can quickly escape through them.

Emergency exits should be adequately marked. Lighted exit signs should be in working order, and should have a battery backup.

If a door or passageway could be mistaken for an exit, it must be clearly marked as "Storeroom" or "Closet" or "Not an Exit". You might know the way out, but a visitor or new employee may not - so make sure the sign is clear to someone unfamiliar with the floor plan.

Never store flammable or combustibles near an exit or a stairwell, because this might cause fire or explosion to block the escape route.

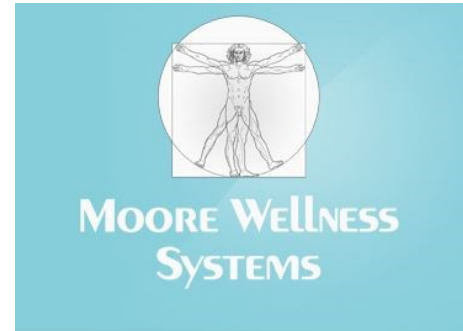
You might be thinking that all of this is somebody else's responsibility. That's not so, if you see an unsafe condition such as an improperly marked door, it is up to you to report it so it can be corrected.

It is also your responsibility to make yourself familiar with emergency evacuation procedures for your work area:

- Know which exit route you are to use, and any alternate routes - in case the first one is blocked. Never use an elevator in a fire.
- Be aware of any special tasks you might be responsible for, such as helping a disabled co-worker to escape.
- Know how to report a fire and other emergencies.
- Know where to find the fire extinguisher. Learn how and when to use it.

In a fire you might have to crawl out on your hands and knees in the dark and the smoke. Emergency exits must be easy to find and easy to use.

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Crane and Hoist Safety

Submitted by: Ed Corlew

Employees frequently use cranes and hoists for different tasks during the day. A crane or a hoist is used to carry a roll from the paper machine to the winder, weigh a cutter roll off the winder, and lower dryer felts out of the felt storage room. Anytime a hoist or crane is being used it is very important to remember safety. Heavy loads can lead to serious injuries, all of which are preventable if safety is kept in mind. Here is a list of some safety reminders when working with cranes and hoists.

Crane and Hoist Safety Reminders:

- Employees, when working with a hoist or a crane, must be familiar with the proper use of knots, hitches, standard hand signals, and the safe method of hooking and slinging.
- Before lifting a full or empty reel spool, both ends must be checked to ensure that the hook is properly engaged.
- Riding on hoist load, hoods, or tackle is prohibited. Standing or walking under an elevated load is prohibited.
- Operators must be aware of, and abide by, load limits of cranes and hoists.
- All cables, sheaves, and other parts subject to wear shall be inspected at factory designated intervals and a record of same shall be kept.
- Suspended loads will not be left unattended.
- All hoisting hooks must have the proper safety latch.
- Any time hoisting equipment is not running properly, secure the load, and notify your supervisor immediately, do not continue to use equipment.



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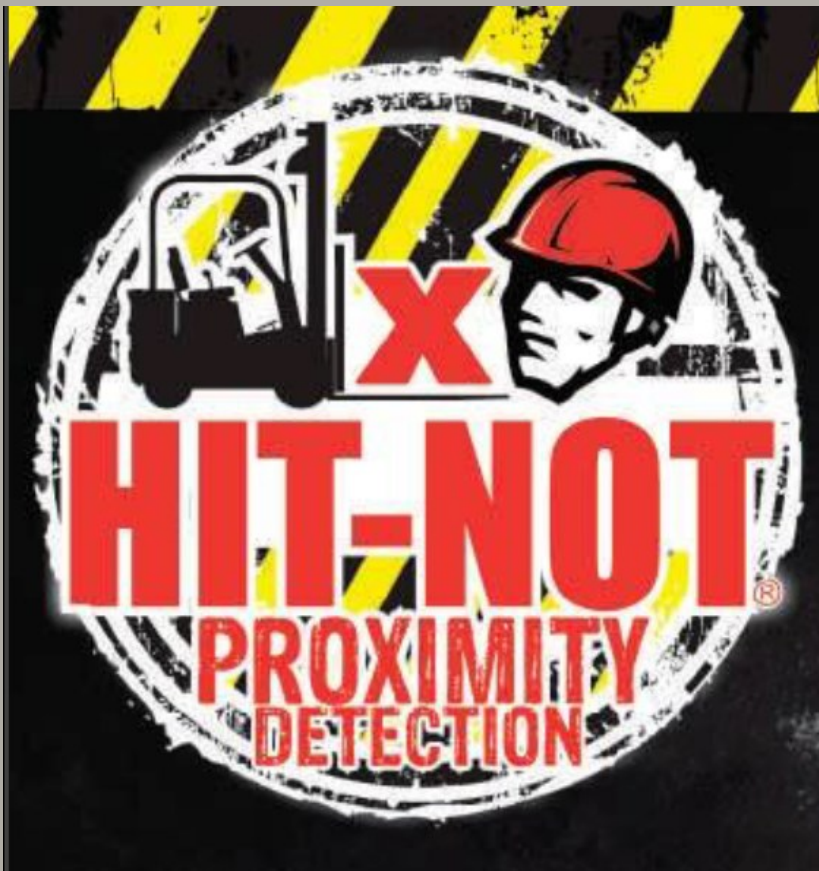


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PPSA is a non-profit, non-political, international organization, devoted to safety throughout the paper industry. From forest products to paper mills, to converting plants, to recycle collections centers, our membership is grouped by category to ensure 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. 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.
- The attendance of vendors at our annual conference allows safety people to keep up with the latest safety equipment, tools and training.

Visit our website at www.ppsa.org for more information.

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