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A Letter From Our Chair

Matthew Kanneberg
Director of Safety & Health, Paper Solutions
WestRock



The 73rd Annual Safety & Health Conference in Mobile, Alabama was a huge success! Over 175 member and vendor attendees joined us at the beautiful Renaissance Battle House hotel in historic Mobile. We had a slate of excellent speakers and, based on attendee critiques, all were well received. 36 vendor companies within the expo showroom shared their great products and services and several spouses and families attended and enjoyed time in and around Mobile.

The PPSA Board of Directors, Conference Committee and PPSA Management Staff did an excellent job of planning and preparing for the conference. We are so thankful for the support of our member companies and corporate and vendor partners.

Congratulations to the many industry members who received awards during the awards banquet. Special congratulations to our Executive Eagle Award winner, Cathy Slater. We are also excited to announce the 2016 Safety Innovator Award champion, Domtar's Dubois, PA location for their winning safety innovation: Dock leveler "STOP" signs and the Safety Committee/Team Award Winner from WestRock St. Paul.

It's both an honor and a pleasure for me to begin another year as your Board Chairman. Our focus will be on continuing to improve to the quality of our member benefits. The Board is committed to bringing more value to our members and truly being an organization that drives proactive and leading efforts toward world class safety. The PPSA wants to engage more, teach more, network more and recognize more by highlighting reliable methods and fostering safety innovation on the leading edge of our potential.

Continued on page 2

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We continue to ask for your feedback and suggestions as we strive to improve! Also, take a moment to 'save the date' on your calendar for the 2017 PPSA Safety & Health Conference in Charleston, SC the week of June 18 - 21.

Best Regards,



Matthew Kanneberg, PPSA Board Chair



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2016 Annual Conference Photos



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Legal Corner

Submitted by Lawrence P. Halprin, Partner—Keller and Heckman LLP

Do Your Company's Written LOTO Procedures Sufficiently Detail the Measures for Verifying De-Energization? ¹

Secretary Of Labor v. CITGO Petroleum Corporation² involved a case in which CITGO refinery employees were assigned the task of isolating a pump from a crude oil unit so it could be serviced by a contractor. CITGO's employees applied lockout-tagout (LOTO) and the contractor had begun work on the pump when a leak of flammable hydrocarbons was discovered. All employees were evacuated from the area. Approximately 30 minutes later, the leaked material ignited, which caused a fire that resulted in approximately \$320 million dollars in damage to the refinery.

CITGO investigated the incident and discovered that the affected system had not been fully isolated. A ten-inch discharge valve had not been fully closed due to an internal obstruction thought to be foreign material rather than structural failure of the valve. According to the trial judge, the employer concluded that the root and contributing causes of the accident primarily involved operator error—the failure of its employees to verify “zero energy.” OSHA determined that the site's written LOTO procedures were inadequate because they did not contain “[s]pecific requirements for testing a machine or equipment to determine and verify effectiveness of lockout devices, tagout devices and other energy control measures” as allegedly required by 29 C.F.R. § 1910.147(c)(4)(ii)(D).

The site had made a significant effort to develop and implement an effective LOTO program. In light of the task-based variability in the required lockout-tagout (LOTO) procedures for complex chemical processes, the employer's LOTO program relied upon generally applicable procedures, extensive training, and task-specific safe work permits, which allowed for the customization of LOTO procedures to a particular job. This approach is consistent with accepted industry practice.

The task of removing the pump involved eleven isolation points and multiple energy sources, all of which were identified in the safe work permit. The LOTO process for this task proceeded as follows:

- 1] The responsible employees identified the scope of the work,
- [2] The equipment operator prepared what is known as an “isolation list”, which set out the description and location of each isolation point, the size of the equipment to be isolated, lockset designations, lockbox numbers, and remarks applicable to specific isolation points. During the preparation of this list, employees “walked the line” of equipment within the scope of the isolation and ensured that all necessary isolation points were on the list.
- [3] The isolation list was reviewed by a unit supervisor, who added more isolation points to the list and gave it his approval. Once this occurred, the isolation list became the master isolation list for the project.

¹Lawrence 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.

²OSHR Docket No. 14-0404, March 9, 2016.

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[4] After the master isolation list was prepared, the equipment operators took steps thought to be effective in closing, locking and tagging all of the isolation valves, and inserting all blinds specified in the master list.

[5] Once a valve was closed or a blind was inserted, the equipment operator signed off on that isolation point on the isolation list to indicate that lockout had been implemented at that location.

[6] The areas between the isolation points were then drained and/or flushed.

[7] After the isolation measures were implemented, the equipment operator and the contractor walked the line again to verify that isolation had occurred. The contractor asked CITGO personnel to open a bolted line to further verify that no hydrocarbons remained in the isolated system.

[8] After 15 minutes, CITGO and the contractor were satisfied that the system was properly isolated and a work permit was issued to the contractor, which authorized performance of the work and provided a checklist to help workers identify job hazards and necessary safety precautions.

The judge's opinion indicates that neither the master isolation list nor the safe work permit described the measures to be followed in verifying isolation. They were covered in CITGO's generic LOTO procedure, which stated:

Before starting the work the Equipment Owner and Lead Worker shall review the job and perform a survey to ensure all energy sources are isolated. The equipment Owner will verify equipment is de-energized by testing all start/stop controls, and/or visual inspection of energy isolating devices.

In the course of the incident investigation, it was discovered that the valve stem on the partially open valve was still visible after it had been hand-wrenched. Seven full threads of the valve stem extended out from the hand wheel. The valve was in a location that could only be reached by a ladder or scaffold, which made visual verification of the position of this particular valve stem difficult.

In other words, it appears that the responsible employee had made the logical, but unfortunately incorrect, assumption that the valve was fully closed when he could no longer turn the hand wheel on the valve stem. That method of verification would not be appropriate in high hazard situations, such as isolation of steam lines, or isolation of a permit space, which requires double block and bleed or line breaking. This case suggests that method of verification also is not appropriate where there is a credible risk of a valve being blocked open by foreign material and failure of isolation poses a significant risk of harm. Left for another day is the case that addresses the adequacy of a visual check of a valve stem as a means of verification.

OSHA alleged a serious violation, stated as follows:

29 CFR 1910.147(c)(4)(ii)(D): The procedures shall clearly and specifically outline the scope purpose, authorization, rules, and techniques to be utilized for the control of hazardous energy, and including, but not limited to, the following:

Specific requirements for testing a machine or equipment to determine and verify effectiveness of lock-out devices, tagout devices and other energy control measures.

Crude unit (Vacuum Tower area) – On or about October 23, 2013, employees were required to lock out for the removal of the 11GT-9A VTB Vacuum Tower Bottoms pump. The written energy control procedure (Isolation List – 11GT-9A VTB pump) did not clearly and specifically outline the requirements for testing a machine or equipment to determine and verify the effectiveness of lockout devices, tagout devices, and other energy control measures. Employees were thereby exposed to the hazards associated with releases of petroleum hydrocarbons (Vacuum Tower Bottoms).

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According to the trial judge, performance standards, such as the OSHA LOTO Standard, require an employer to identify the hazards peculiar to its own workplace and determine the steps necessary to abate them in light of what is reasonable, with the understanding that the level of detail required must be commensurate with the complexity of the process. Because the purpose of the lockout procedure is to guide an employee through the lockout process, general procedures are not acceptable, at least in the context of a complex chemical process. The judge upheld OSHA's position that a site's LOTO procedures for verifying isolation must identify the location where verification of isolation is to occur and indicate the method which will be employed to verify isolation.

In light of the general nature of CITGO's written procedure for verifying isolation, and considering the complexity associated with implementing LOTO in this context, the judge found that procedure to be inadequate, because there was nothing to guide the authorized employees through the entire LOTO process as required by the LOTO Standard. The trial judge also made it clear that an extensive training program is not an acceptable substitute for specific procedures: "To suggest, as Respondent has, that extensive training can take the place of a written procedure runs afoul of the very reason for the requirement in the first place—minimizing the element of human error."

In this case, the trial judge found the generic verification procedure did not contain "specific requirements for testing a machine or equipment to determine and verify effectiveness of lockout devices" Left for another day would be a case where the procedure did contain "specific requirements," but OSHA determined they were inadequate.

The parties stipulated that the LOTO Standard applied to the isolation of the pump, but it is unclear from the opinion as to what energy sources were contemplated by that stipulation and what energy sources were not adequately controlled. OSHA has provided only ambiguous and seemingly inconsistent descriptions of what it considers to be chemical energy sources as distinguished from thermal energy sources. If OSHA's suggested definitions of chemical energy sources are read literally, it would appear that almost any failure to empty, flush and decontaminate any item of equipment could be viewed as a failure to comply with the LOTO Standard.

Another potentially challenging area involves the lockout of computer-controlled equipment where, unless the test function overrides the need for certain signals before a test movement is triggered, the pushing of a button would not be expected to detect whether the lockout was effective. In any event, it appears that employers will have to review portions of their LOTO procedures that have previously been taken for granted.

How is PPSA doing?

We want to know.

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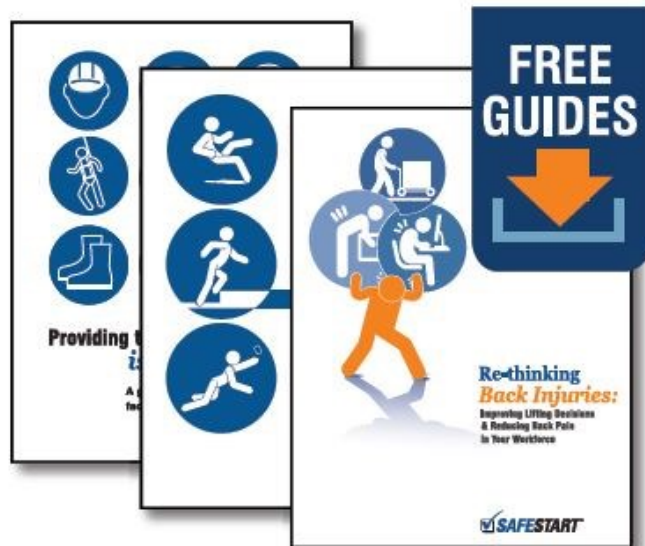


Your Biggest Safety Challenges Solved

A survey of 1,101 safety managers conducted by Safety Daily Advisor found that 85% of respondents cited human factor incidents and employee noncompliance as their biggest safety challenge with the 5 items shown on the left topping the list.

Most of these safety issues have the same cause—human factors like rushing, frustration, fatigue and complacency leading to unintentional errors or errors in judgement.

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PPSA Annual Awards

No OSHA Recordable Case Award

This award is presented to all member locations that complete a calendar year without incurring an OSHA recordable case.

Best One Year Safety Record

This award is presented in each of the reporting categories to the member that has the lowest OSHA total case incident rate for the preceding year. The award is sponsored by the Pulp & Paper Safety Association.

Most Improved

This top tier award is presented to the member in each of the reporting categories that shows the greatest improvement in OSHA recordable incident rate over the past two years.

The Award of Safety Excellence

This is the most prestigious award given for operating excellence. Three of these awards are presented annually. One to combined paper mills, tissue mills and recycle mills; one to all converting operations combined; and the third to all woodlands and solid wood operations. The award is based on the best safety record for three consecutive years.

The Safety Innovator Award

The PPSA Safety Innovator Award will go to the one facility annually demonstrating the most innovative safety improvement product/process implemented during a designated date range prior to the annual conference. In order to receive this award, a facility must apply for it, be selected as a finalist and lastly present their innovation in a spirited competition at the annual conference. Conference attendees vote ballot or vote secretly to determine the year's annual winner.

The Safety Committee/Team Award

This award honors a pulp & paper industry safety committee/team that has made a significant contribution to safety & health at their location, company, or within the industry. In order to receive this award, a committee/ team must apply for it, be selected as a finalist by the PPSA awards committee and lastly receive the most votes by conference attendees at the PPSA safety conference. The winning site will receive the Industry Safety Committee /Team Award trophy and be highlighted on the PPSA website and upcoming quarterly report.

Executive Eagle Award

This prestigious award is given each year to honor a pulp & paper industry executive that has made a significant contribution to the safety & health programs within their area or areas of direct responsibility and has a demonstrable record of support for the Pulp & Paper Safety Association.

73RD ANNUAL
**SAFETY & HEALTH
CONFERENCE**

NEXT GENERATION SAFETY: MEETING THE CHALLENGE OF CHANGE

JUNE 5-8, MOBILE, AL
THE BATTLE HOUSE RENAISSANCE HOTEL



No OSHA Recordable Case Award

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International Paper
100% Recycle Mill
Henderson Mill

Graphic Packaging
International
100% Recycle Mill
East Angus

Sonoco
100% Recycle Mill
Depere

Green Bay Packaging
Corrugated Box Plant without
Corrugators
Chickasha, Ok

WestRock
Corrugated Box Plant without
Corrugators
Atlanta East Sheet Plant

WestRock
Corrugated Box Plant without
Corrugators
Beloit Sheet Plant

WestRock
Corrugated Box Plant without
Corrugators
Caixa Pronta Curitiba

WestRock
Corrugated Box Plant without
Corrugators
Caixa Pronta Sao Paulo

WestRock
Corrugated Box Plant without
Corrugators
Des Moines Sheet Plant

WestRock
Corrugated Box Plant without
Corrugators
Fort Smith Sheet Plant

WestRock
Corrugated Box Plant without
Corrugators
Gallatin Fullfillment

WestRock
Corrugated Box Plant without
Corrugators
Gallatin Sheet Plant

WestRock
Corrugated Box Plant without
Corrugators
Graphcorr

WestRock
Corrugated Box Plant without
Corrugators
Highland Sheet Plant

WestRock
Corrugated Box Plant without
Corrugators
Houston Sheet Plant

WestRock
Corrugated Box Plant without
Corrugators
Kennesaw Sheet Plant

WestRock
Corrugated Box Plant without
Corrugators
Lexington Sheet Plant

WestRock
Corrugated Box Plant without
Corrugators
Spartanburg Sheet Plant

Green Bay Packaging
Corrugated Box Plant without
Corrugators
Ft. Worth, TX

WestRock
Corrugated Box Plant without
Corrugators
Baltimore South Container

WestRock
Corrugated Box Plant without
Corrugators
Bradenton Container

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NEXT GENERATION SAFETY: MEETING THE CHALLENGE OF CHANGE
JUNE 5-8, MOBILE, AL
THE BATTLE HOUSE RENAISSANCE HOTEL

PPSA
PULP & PAPER SAFETY ASSOCIATION
ESTABLISHED 1945

No OSHA Recordable Case Award

WestRock
Corrugated Box Plant with
Corrugators
Bridgeview Container

WestRock
Corrugated Box Plant with
Corrugators
Cerritos Container

WestRock
Corrugated Box Plant with
Corrugators
Chattanooga Container

WestRock
Corrugated Box Plant with
Corrugators
Covington Container

WestRock
Corrugated Box Plant with
Corrugators
Dayton Container

WestRock
Corrugated Box Plant with
Corrugators
Denver Container

WestRock
Corrugated Box Plant with
Corrugators
Mishawaka Container

WestRock
Corrugated Box Plant with
Corrugators
El Paso East Container

WestRock
Corrugated Box Plant with
Corrugators
Etobicoke Manufacturing

WestRock
Corrugated Box Plant with
Corrugators
Guelph Container

WestRock
Corrugated Box Plant with
Corrugators
Humboldt Container

WestRock
Corrugated Box Plant with
Corrugators
Monterrey MX Container

WestRock
Corrugated Box Plant with
Corrugators
Montgomery Container

WestRock
Corrugated Box Plant with
Corrugators
Sioux Falls Container

WestRock
Corrugated Box Plant with
Corrugators
Town Mt Royal Container

WestRock
Corrugated Sheet Feeder Plants
Bedford Park Sheet Feeder

Mohawk Fine Papers
Distribution
Albany Regional Distribution
Center

Domtar
Fine Paper Converting Plants
DFW Converting Center

Domtar Paper Company
Fine Paper Converting Plants
Rock Hill Converting Center

WestRock
Folding Carton Plants
Aardex - Switzerland

WestRock
Folding Carton Plants
Bilbao, Spain Beverage

WestRock
Folding Carton Plants
Dublin Folding

WestRock
Folding Carton Plants
Sainte-Marie Folding

WestRock
Folding Carton Plants
Shimada, Jap
(Mead Kk Tokyo Shimada) Beverage

WestRock
Folding Carton Plants
Svitavy Czech Republic Beverage

Weyerhaeuser
Other Paper Converting
Columbus Modified Fiber

Domtar Paper Company, LLC
Other Paper Converting
Brownsville Converting &
Distribution

Domtar Personal Care
Other Paper Converting
Waco-TX

WestRock
Other Paper Converting
Hebron Pre-Print

WestRock
Other Paper Converting
Iowa City Assembly

WestRock
Other Paper Converting
Jacksonville Pre-Print

WestRock
Other Paper Converting
Silsbee Extruder Plant

WestRock
Other Paper Converting
Smyrna GA Machinery SES



No OSHA Recordable Case Award

WestRock
Other Paper Converting
Toronto Assembly

WestRock
Other Paper Converting
Toronto RTS

WestRock
Other Paper Converting
Tucker Engineering RTS

WestRock
Other Paper Converting
Valinhos Ink Plant

WestRock
Other Paper Converting
Venlo Manufacturing
Netherlands

Domtar
Paper Mill Small
Marlboro Mill

WestRock
Woodland Operations
Forest Resources

WestRock
Pulp & Paper Mill
Vapi Mill

Weyerhaeuser
Pulp Mill
Flint River

Weyerhaeuser
Pulp Mill
Grande Prairie

WestRock
Recycle Collection Center
Anchorage Recycle

WestRock
Recycle Collection Center
Atlanta Converting Sales

WestRock
Recycle Collection Center
Augusta Recycle

WestRock
Recycle Collection Center
Bakersfield Recycle

WestRock
Recycle Collection Center
Cleveland Recycle

WestRock
Recycle Collection Center
Columbus Recycle

WestRock
Recycle Collection Center
Division Staff Recycle

WestRock
Recycle Collection Center
Ft. Lauderdale Recycle

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Mohawk Fine Papers
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East Angus

WestRock
Corrugated Box Plants without
Corrugators
Beloit Sheet Plant

WestRock
Corrugated Box Plants with
Corrugators
Monterrey MX Container

WestRock
Corrugated Sheet Feeder Plant
Bedford Park Sheet Feeder

Domtar
Fine Paper Converting
Rock Hill Converting Center

WestRock
Folding Carton Plants
Svitavy Czech Republic
Beverage

Domtar
Other Paper Converting
Personal Care-Waco, TX

Domtar
Paper Mill Medium
Windsor Mill

Domtar
Paper Mill Small
Marlboro Mill

Weyerhaeuser
Pulp Mill
Grand Prairie

WestRock
Recycle Collection Center
Portland-East Recycle

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Chickasha, OK

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Denver Container

WestRock
Corrugated Sheet Feeder Plant
Hanover Park Sheet Feeder

Domtar
Fine Paper Converting
Ridgefields Converting

WestRock
Folding Carton Plants
Fresno Fold-Pak

WestRock
Other Paper Converting
Knox Food Service Packaging

WestRock
Paper Mill Medium
West Point Mill

WestRock
Paper Mill Small
Stevenson Mill

Domtar
Pulp Mill
Kamloops Pulp Mill

WestRock
Recycle Collection Center
Nashville Recycle

Mohawk Fine Papers
Specialty Operations
Saybrook Converting Center



Award of Excellence

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Pulp Mill



GREEN BAY PACKAGING INC.

Green Bay Packaging
Ft. Worth, TX

Corrugated Box Plants with Corrugators



WestRock
Rooster Bridge Chip Mill
Woodland Operations

Innovator Award Winner

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Dubois: Dock leveler “STOP” signs

The PPSA Safety Innovator Award will go to the one facility annually demonstrating the most innovative safety improvement product/process implemented during a designated date range prior to the annual conference. In order to receive this award, a facility must apply for it, be selected as a finalist and lastly present their innovation in a spirited competition at the annual conference. Conference attendees voted by secret ballot to determine the year's winner.

Safety Committee/Team Winner

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St. Paul: Safety Committee

The PPSA Safety Industry Safety Committee/Team Award will go to the committee/team that has made a significant contribution to safety & health at their location, company, or within the industry. To receive this award, a committee/team must apply for it, be selected as a finalist by the PPSA awards committee and lastly receive the most votes by conference attendees at the PPSA safety conference.

Executive Eagle Winner

Cathy Slater- Senior VP, Cellulose Fibers & Printing Papers - Weyerhaeuser

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The Association annually presents its most prestigious award to an outstanding executive in the paper industry who has made major contributions to the cause of accident prevention in his/her own company and beyond.

This year's winner is Cathy Slater, Senior VP, Cellulose Fibers & Printing Papers of Weyerhaeuser. She began her career with Weyerhaeuser in 1992 as a Utilities Unit Manager. During her career, she has served in a variety of leadership roles throughout the company including: Utilities, Unit Manager; Assistant Plant Manager; Vice President; Vice President/Mill Manager; VP/Veneer Technologies; VP/Engineered Wood Products Manufacturing; and VP, Oriented Strand Board Business.

Cathy received her bachelor's degree in Chemical Engineering from the University of South Alabama in 1985. In 2013 she participated in three programs at the University of Pennsylvania. The programs include: *Critical Thinking: Real World, Real Time Decisions*; *Strategic Thinking & Management for Competitive Advantage*; and *Financial Accounting for Non Financial Executives*.

She has received a number of awards and honors for her dedication to safety. Among those are the Pulp & Paper Safety Award (2005), the CPPA Awards (2002) (Safest mill in Canada, Lowest Injury Frequency, and Zero Lost Time Injuries), And the Weyerhaeuser President's Award for Safety (1999).

Cathy also currently is on the Board of Directors for the APA-Engineered Wood Association, American Wood Council, and Mathematics Engineering's Science Achievement (MESA); a Co-sponsor and Panel Participant of the Executive Development Institute (EDI), and a St. Vincent De Paul Counselor.

If you ask her what drives her passion for safety, she will tell you that safety is something that comes naturally to her because it is a part of everything she does. She considers the people she works with to be like family, and when you genuinely care for people, safety just happens. In her 21 years in the industry she has demonstrated an uncompromising attitude toward safety and health by total employee involvement, effective training, and management leadership.



PPSA

Career Center

PPSA is proud to announce its Career Center - the premier resource to connect career opportunities with highly qualified Pulp & Paper industry professionals.

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Recruit for Open Positions

- Post your jobs, or your company's jobs, where the most qualified industry professionals will find and apply to them.
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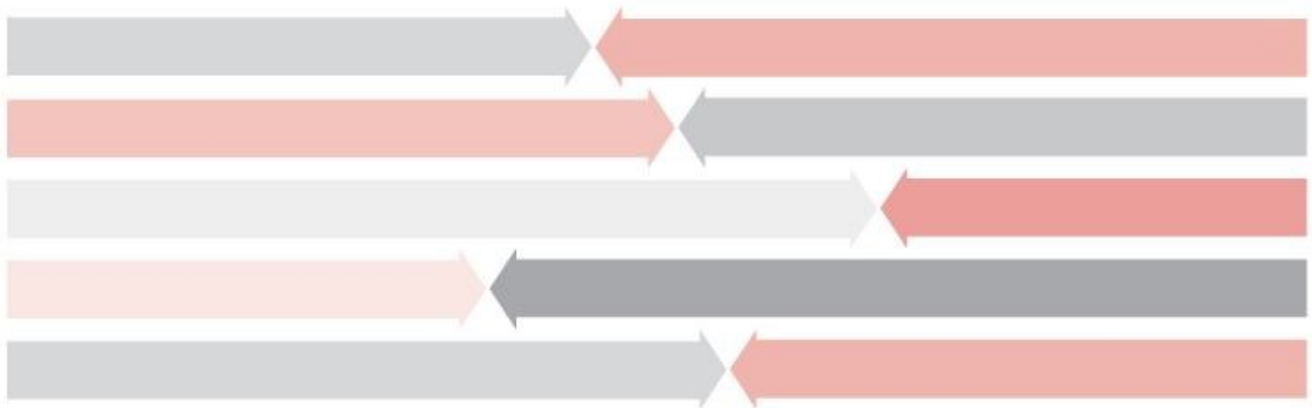
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THE SCIENCE OF SAFETY:

The ABC's of Industrial Barriers

**WHITE
PAPER**



THE SCIENCE OF SAFETY

Industrial facilities are inherently dangerous and use a variety of barriers to protect people, products and property. In some instances, these barriers may simply separate pedestrian traffic from other internal vehicle traffic. In other facilities, barriers may be employed to keep people away from automated processes and machinery or to protect employees against falls. Barriers may also be used to protect production equipment and/or the building itself from vehicle damage. In all cases, barriers play an important role in helping facilities operate safely and efficiently. An appropriate safety barrier should only be selected after evaluating the application criteria.



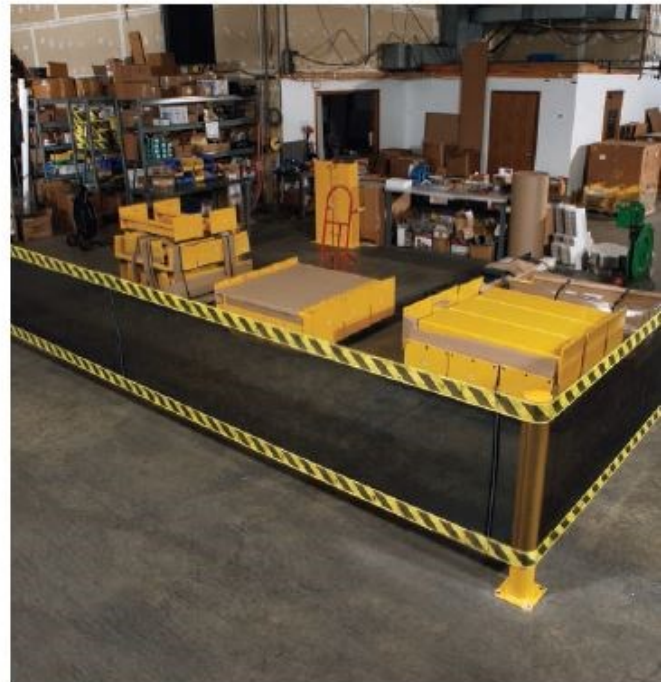
Rite-Hite Dok-Guardian Safety Barrier

In heavy equipment operation zones, safety barriers also are frequently used (and for good reason). Roughly 20,000 people are seriously injured and 100 killed every year in forklift-related incidents across the U.S., according to the National Institute of Occupational Safety and Health. The barriers used in these applications are designed to absorb the energy of a vehicle impact, protecting plant personnel from potentially life-threatening injuries. Barriers are often applied at the edge of loading docks to protect pedestrians from accidentally stepping off, as well as forklift and other vehicle operators from inadvertently rolling over the edge. Safety barriers can also be applied to protect sensitive equipment or structural elements in a facility, saving repair costs and downtime.

TYPES OF BARRIERS

One of the simplest forms of safety measures are yellow lines painted on facility floors to designate pedestrian walkways. Although walkways are common in industrial facilities, they are increasingly being augmented with physical barriers. These barriers add a vertical visual component and create a physical barricade between pedestrians and potential hazards, enhancing safety. According to a report from the National Safety Council, workplace injuries accounted for nearly \$200 billion in 2012.

Roughly 20,000 people are seriously injured and 100 killed every year in forklift-related incidents across the U.S., according to the National Institute of Occupational Safety and Health.



Rite-Hite SpanGuard Safety Barrier

Continued on page 20

Continued from page 19

THE SCIENCE OF SAFETY



DANGERS ABOVE THE PLANT FLOOR

In mezzanine and elevated work platform applications, safety barriers can be implemented near edges where loading and unloading take place. This safety precaution can help prevent falls, which is a major issue every year – there were nearly 600 fatalities due to workplace place falls to a lower level in 2013, according to a report from the Bureau of Labor Statistics.

HOW BARRIERS WORK: DEFLECTION

Barriers absorb an impact by distributing the impact energy into the materials that comprise the barrier. As the barrier absorbs energy, the materials that comprise it elongate and the barrier deflects. There are two components to barrier deflection. During the impact, the barrier deforms elastically to the point at which energy reaches equilibrium. After most impacts, the barrier returns to its original position. After a severe impact, the barrier may sustain permanent deformation. Before installing a barrier, the user must consider the maximum elastic deflection to ensure adequate protection of personnel and equipment.

Barriers absorb the kinetic energy of an impact by distributing the impact energy into the materials that comprise the barrier.

CONSIDERATIONS

There are several considerations facility managers should keep in mind when contemplating safety barriers applications:

- What are the maximum gross loads and speeds of the material handling equipment expected to impact the barriers?
- Is there sufficient space to allow the barrier to sustain maximum deflection when impacted?
- Is repair or replacement acceptable after a barrier impact creates permanent deformation?
- Are barriers permanently installed or do they need to be removed on a regular basis?

The impact rating of a barrier is often difficult to define. Although OSHA's regulation 1910.23 (Guarding floor and wall openings and holes) defines requirements for pedestrian handrails, it does not address barriers designed to stop heavier loads than the 200-lb. standard it uses.

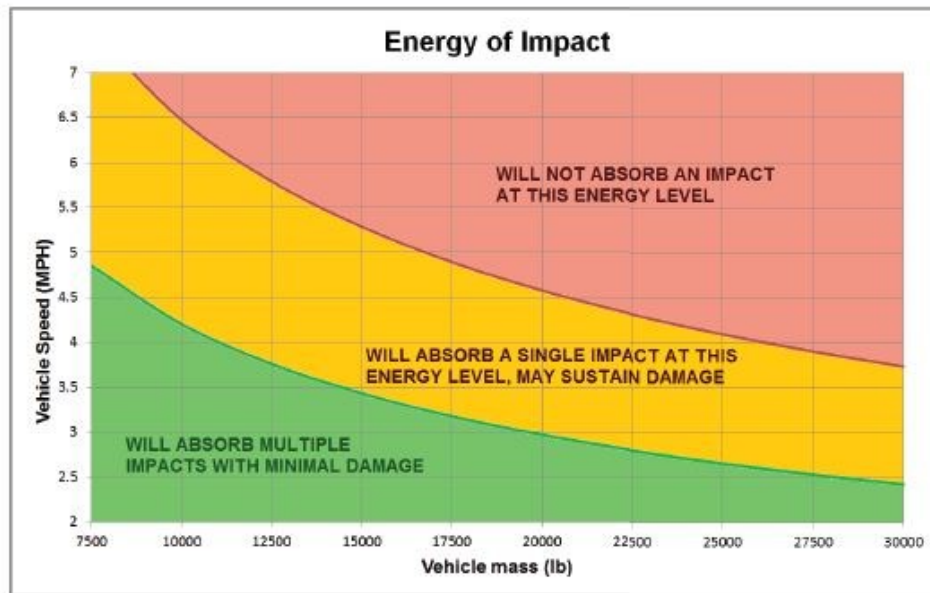
Many manufacturers rate industrial barriers based on their ability to stop an impact of 10,000 lbs. at 4 mph – which has been an industry standard for more than 30 years. However, while this rating provides a meaningful reference for a specific load at a specific speed, it fails to define several key variables:

- How is the barrier's performance affected as the mass of the impacting vehicle increases?
- How is the barrier's performance affected as the impacting vehicle's speed increases?
- How severely was the barrier damaged by the impact? Is replacement necessary?
- How much did the barrier deflect during impact? Did it stop the load soon enough to prevent injury or damage?

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THE SCIENCE OF SAFETY



BARRIER LOAD AND SPEED TEST (BLAST)

Rite-Hite has developed a test methodology to quantify specific application variables and determine barrier ratings in terms of total kinetic energy absorption, instead of a specific mass and speed.

$$KE = \frac{1}{2}mv^2$$

(where m=mass [weight]
and v=velocity),

It is centered on the formula for kinetic energy ($KE = \frac{1}{2}mv^2$, where m=mass [weight] and v=velocity), which takes into account both the weight and speed of the impacting object. Expressing the impact rating in terms of energy allows the user to understand the effects of various speeds and weights and determine a more appropriate barrier for their application than would be possible with a single speed and mass rating. At the top of the page is an example of a kinetic energy chart for a Rite-Hite safety barrier.

The chart separates the barrier's impact rating into three different areas. The green area shows testing where the barrier wasn't damaged and it is capable of

being impacted again. The yellow area shows where the barrier stopped the impact load, but potentially sustained damage and would possibly need repair or replacement. The red area shows where the impact energy exceeds the barrier's maximum rating. In these cases, the impact cannot be fully absorbed and the barrier would not be able to stop the load – indicating that this barrier should not be used for this application.

Kinetic energy ($KE = \frac{1}{2}mv^2$) is proportional to the mass and to the square of the velocity. Because of the squared velocity term (v^2), changes in the velocity component have a greater effect on kinetic energy than changes in the mass (weight).

THE BOTTOM LINE

Installing safety barriers is a cost effective, yet important investment that can help prevent accidents, injuries and damage to products or equipment. Before selecting barriers to invest in, it is important to consider all of the application requirements. Once these site-specific variables are determined and understood, a user can select the best barrier(s) to meet their safety and protection needs.

¹ <http://www.mhi.org/downloads/industrygroups/ease/technicalpapers/2013-National-Safety-Council-Injury-Facts.pdf>

² <http://www.bls.gov/news.release/pdf/cfoi.pdf>

³ <http://www.cdc.gov/niosh/docs/2001-109/>

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Bringing the safety message home: The PPSA annual meeting meets the challenge of change

Moving to Mobile for its 73rd annual conference, the Pulp & Paper Safety Association (PPSA) program touched all the bases, practical and theoretical, and then some. Nancy Garry, HRP Associates, led a full day session dealing with the fundamentals of OSHA compliance in the paper industry.

This year's opening keynote speaker was Steve Borkowski, Borkowski & Associates. He told attendees that human error thrives in every industry, but that the greatest cause of human error is not lack of skills or knowledge but organizational weakness.

He added that error rates can never be taken to zero but the consequences of errors can be eliminated by installing layers of protection. He asked that companies not fall into the "blame cycle".

"Things that have never happened before happen all the time," he said. People are fallible; even the best make mistakes. Companies must make a conscious commitment to reduce/eliminate human error or it is an acceptance of future human error. However, there are human error reduction tools available.

Randy Adams, Kruger, was the first of the mill speakers, looking at management to employee communications. Companies need to study how they look at issues. Do they focus on the "problem" or the "opportunity"? Are these issues approached in a positive or negative fashion? In his handout, Adams says the outcome can be greatly affected by the attitude taken to meet the challenge. "They will filter down to the workforce very quickly if not facilitated properly."

Eric Hobbs, an attorney now with Ogletree Deakins, and always a popular speaker at the conference, presented his annual update of OSHA regulations. He told attendees to expect changes with whatever new administration takes over after the November presidential election.

He said OSHA has a leadership and field crisis as many in the body are getting older and closer to retirement. Hobbs discussed some of the rules in the pipeline: beryllium; the revocation of obsolete permissible exposure limits (and the imposition of new ones); and combustible dust to name a few.

All employers with more than 250 employees will need to report all recordable cases electronically and will be posted on the OSHA website. Also, this year, employers must relay to employees that they have the right to report injuries, should do so and how to do so.

Hobbs came back with a second presentation on how to prepare for an OSHA inspection. This will be the subject of a *Paper360° Magazine* feature. Suffice to say that Hobbs warned of the impact recent OSHA regulations and sub-regulation activity will have on the handling of OSHA inspections. The stakes are higher. The agency is more aggressive. The taking and keeping control of the scope of the inspection by the subject is more critical than ever.

Larry Wilson, Safestart, was the keynote speaker for the second day. He pointed out that the most risky things one does are not necessarily the cause of most accidents or injuries. This is because people tend to focus more when faced with increased risk.

Complacency is very often the enemy. People base personal risk assessments on the chance of the unexpected happening. 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, all of which increase the risk of injury.

Error prevention techniques that help avoid the critical errors include self-trigger on the state or amount of hazardous energy; analyze close calls and small errors; look at others for the patterns that increase the risk of injury; work on habits.

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He also advised attendees not to overlook the “old school” stuff such as training, equipment and permits.

Dennis Downing, Future Industrial Technologies, focused on back injury prevention. He reminded attendees that if a problem persists, you have not discovered or corrected the true cause. Downing noted that 80% of the US population suffers a back incident every year. What is the cause? Twisting is the most harmful motion. Back injuries are really micro-traumas happening to the body over time. Proper techniques for activities such as lifting are needed to prevent these micro-traumas. He gave three simple rules: Keep the load close; keep the head up; keep the nose between the toes.

Going back into the mill, Bayless Kilgore, Ensafé, discussed the dangers of combustible dust. He showed a video that revealed the devastating effects of dust explosions, which can happen across many industries.

It is important to clean out-of-the-way places where dust can accumulate and to check processes to ensure minimal dust production. The smaller and drier the dust particle, the more hazardous the dust is.

A proper (and well-maintained) dust collection system is critical for preventing explosions. Companies need to know the properties of the dust they generate to be able to properly design a collection/conveyance system.

The focus was on Domtar and its use of the human performance improvement process (HPI). Michel Paquette described the principle of HPI including that people are fallible and that error-likely situations are predictable, manageable and preventable.

HPI is not limited to safety; it touches all value drivers and moves away from relegating human error to a fault-based system. Paquette noted that 20% of unwanted events are from equipment failure while the rest are from human error, of which more than half result from latent organizational weaknesses. HPI investigations try to see incidents through the eyes of the worker. It is a systemic approach to root cause analysis.

David Orton, Mohawk Paper, brought things back to basics when he spoke about fall prevention and roof guarding. Falls are still firmly ensconced in OSHA's top 10 causes of death in the workplace.

Fall arrest systems should be rigged so that a worker cannot fall more than six feet. Protective fall equipment should be inspected for damage before and after use. It should be removed from service after a fall for inspection.

Thomas Smith, Brady, gave an update on GHS implementation, from law to labeling. The GHS standard covers all chemicals in the US. June 1, 2016, was the deadline for application but many questions remain. This will also be the subject of a future *Paper360° Magazine* feature.

The biggest challenges to meet, according to Smith, are labels, safety data sheets, and training. He said that labels need to contain six common elements. Training should be reinforced. It has gone from a “right to know” to a “right to understand”. Simply handing an employee an SDS does not comply.

Electronic copies of an SDS are OK but a back-up system is needed and hard copies need to be on hand for first responders in case power is lost.

Ted Borgerding, AstenJohnson, spoke from personal experience on the effect of workplace accidents. He cited the fraction of a second it takes to pull a grown person into a moving nip. We need to rely on each other to succeed. Most of OSHA's top 10 most frequently cited violations can be found in a pulp and paper mill and a mill contains numerous others that are not on that top 10 list.

Although personal protective equipment (PPE) is essential, manmade devices can override an individual's disregard for his/her own safety. The most important piece of PPE is the brain.

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The only way any program can work is with a personal commitment. No one can force anyone to work safely. He provided a list of do's as a way to help:

- Walk in their shoes
- Observe and learn
- Know our nips
- Train, train, train
- Proactive job hazard analysis

The aging workforce has been an ongoing issue in this industry for the better part of 20 years. Referred to as the Platinum or Silver Tsunami, Dr. Warren Silverman, Access Health Systems, noted that already, more than 33% of the US workforce is older than 50.

And, many of these are not contemplating retirement. He cited statistics that showed 38% of those aged 50 to 64 envision working beyond 65 and that another 31% of the remainder would consider staying if they had flexibility in the job. The number of those aged 65 working fulltime versus part time is rising rapidly.

Silverman discussed many of the effects of ageing: reduced muscle mass, vision, manual dexterity, flexibility, reaction time. But he also discussed many of the at-work measures that can be taken by employers to alleviate the effects of ageing and keep these workers productive.

To go along with the formal papers, the popular New Technology Showcase was again scheduled with nine companies giving short presentations on their latest innovations.

The Innovator Award returned for a second time. The award honors one facility annually demonstrating the most innovative safety improvement product/process implemented during a designated date range prior to the annual conference.

Sponsored by International Paper, the six finalists were Domtar (Windsor, Ariva, Marlboro, and Dubois) and WestRock (Joplin and Nicholasville). The winner was Domtar Dubois with the Dock leveler "STOP" signs innovation.

A new award was introduced this year, the Safety Committee Award, sponsored by Kruger Products. This award honors the committee/team that has made a significant contribution to safety & health at their location, company, or within the industry. The PPSA narrowed it down to four finalists : Domtar Plymouth, New-Indy Ontario, WestRock St. Paul and Buckhannon. The winner was WestRock St. Paul Safety Committee.

Finally, the PPSA's highest honor, the Executive Eagle, was presented to Cathy Slater, Weyerhaeuser. In a truly touching and profound acceptance speech, Slater discussed her personal journey in the industry that shaped her views and commitment to safety during her career and led to her being awarded the Eagle.

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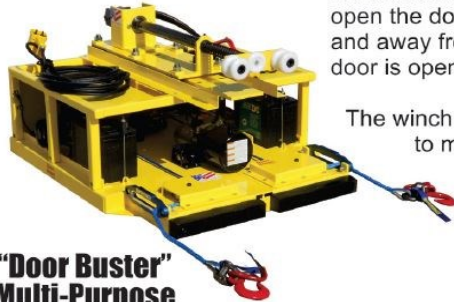
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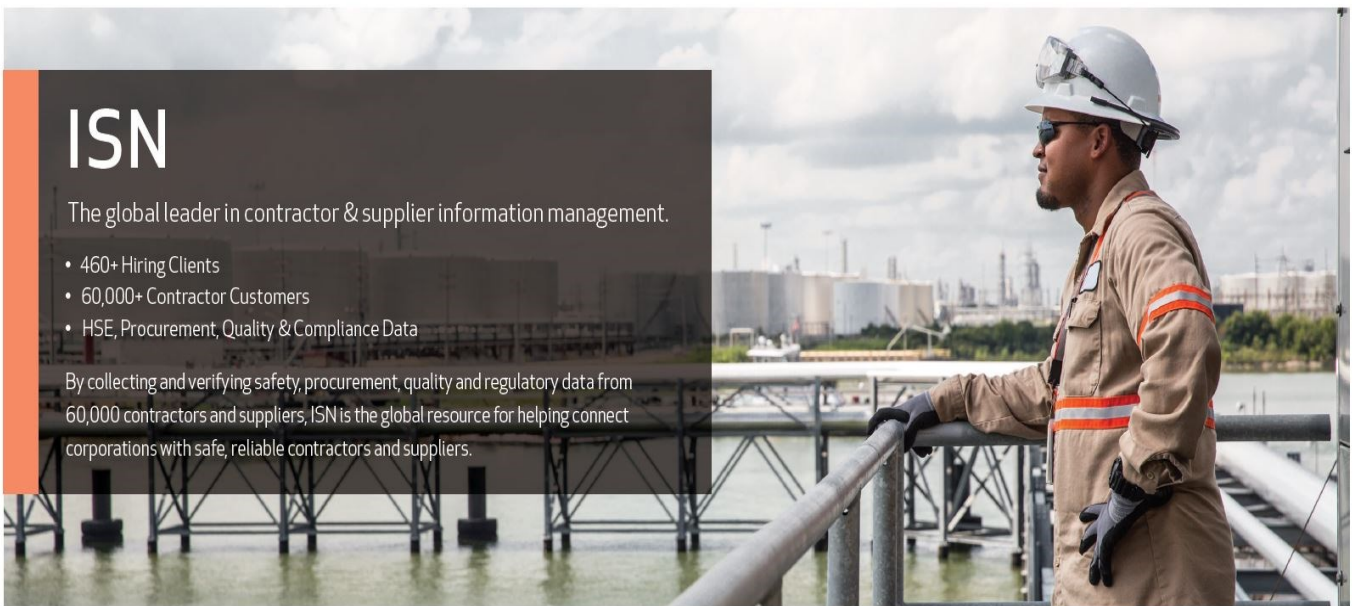


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Summer Days



As summer continues, people do different activities versus the stay indoors routine that they do during the winter/cold months of the year.

We want to remind people that with the increase of activity during the days of summer, comes the increased hazards. Don't let a misfortunate incident ruin summer fun and activities for you and your family.

Here are some summer safety tips and reminders you can follow to help you and your family to have a fun and safe summer.

Alcohol is one of the biggest contributors to fatal/serious incidents while operating motor vehicles and boats, during the summer. Alcohol also can cause dehydration which can lead to heat related illnesses.

Vacations/traveling: the roads and highways are always more active during the summer with family vacations and the increase of summer activities. Plan ample time for travel and avoid heavy construction areas if possible and if you can't, respect the safety of construction workers. Also be aware of the increased motorcycle traffic during the warmer weather. Look twice save a life.

Swimming and beach activity is always a favorite way to keep you cool and refreshed during the heat of the day. Be sure to protect yourself and loved ones from the heat of the sun with shade and sunblock and be sure drink plenty of fluids that will help keep you hydrated. Keep an eye on little ones and those who can't swim, when near water.

Boating: never drink alcohol when operation a motor boat, ensure to have and use the proper flotation devices when enjoying boating activities, whether its skiing , tubing, canoeing or kayaking. It is also a good idea to research and know the waters that you will be enjoying the boating activities in.

Camping/camp fires: Whether it is in your back yard or in the wilderness, be aware of the wild life in the area that you will be setting up your camp site. Ensure that camp fires are extinguished prior to retiring for the evening.

Heat: Don't let heat related illnesses ruin your summer. If you enjoy yard work, perform your summer yard work during the morning and evening hours when the heat index is lower than in the middle of the day. Protect yourself and family member with shade and sun block when enjoying outdoor activities.

Have a safe and wonderful summer!



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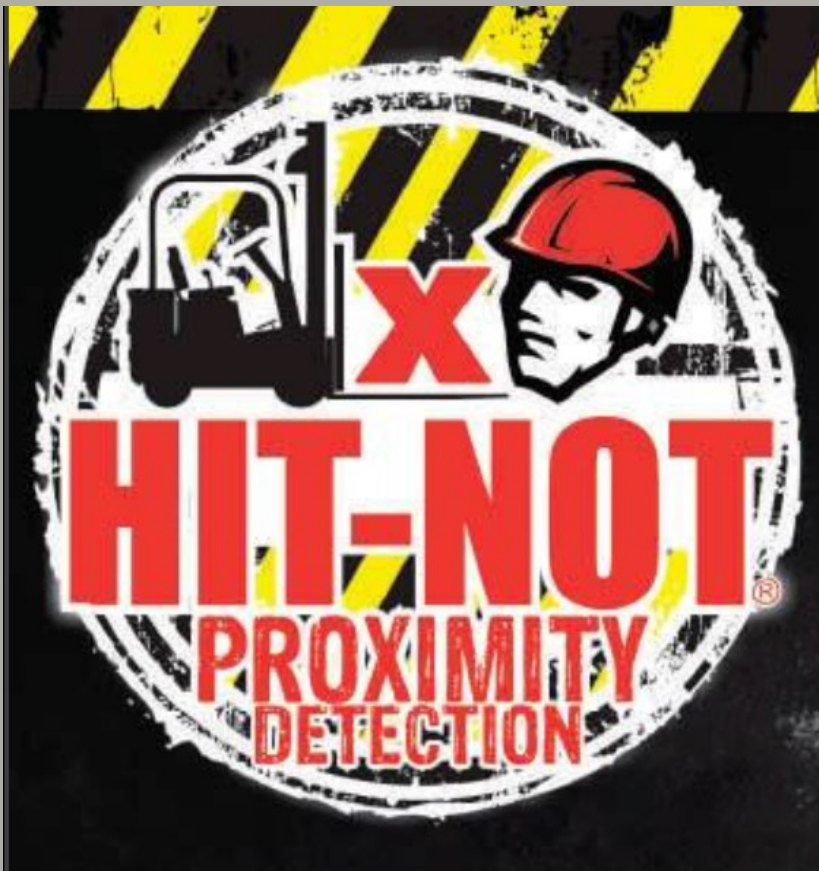


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OSHA QuickTakes

July 1, 2016

Volume 15, Issue 16

Top Stories

OSHA penalties to be adjusted for inflation after August 1

Maximum penalties for OSHA violations are [set to increase](#) for the first time since 1990 as part of overall federal penalty adjustments mandated by Congress last year. The increases were announced Thursday by the Department of Labor, which issued [two interim rules](#) covering penalty adjustments for several DOL agencies, including OSHA, the Mine Safety and Health Administration and Wage and Hour Division.

OSHA's new penalty levels will take effect after Aug. 1, when the maximum penalty for serious violations will rise from \$7,000 to \$12,471. The maximum penalty for willful or repeated violations will increase from \$70,000 to \$124,709. Any citations issued by OSHA after Aug. 1 will be subject to the new penalties if the related violations occurred after November 2, 2015. OSHA will provide guidance to field staff on the implementation of the new penalties by Aug. 1.

Ohio auto parts manufacturer faces \$3.42M in fines for willfully exposing workers to machine hazards

After two workers suffered severe injuries in separate incidents at an auto parts manufacturing plant in Hebron, Ohio, an inspection by OSHA found numerous safety violations that exposed other workers to amputation hazards and more. OSHA issued 57 violations to Sunfield Inc. and proposed that the company, which provides parts to major carmakers, pay more than \$3.42 million in fines.

Three staffing agencies that provided the bulk of Sunfield's workforce [Atrium Personnel](#), [iforce](#) and [Employers Overload](#)—also face proposed penalties of \$7,000 each for failing to provide required safety training.

"Sunfield has shown a total disregard for its workers, the kind rarely seen since the darkest days of the past when callous industrialists ruled and put profits before human suffering and common decency," said OSHA Assistant Secretary Dr. David Michaels. The company has an extensive history of federal safety violations dating back 20 years, and was placed on OSHA's [Severe Violator Enforcement Program](#). For more information, see the [news release](#).

Employers highlight efforts to protect waste collection workers in heat

As temperatures soared across the country, OSHA, on Jun 27, hosted a conference call with employers, industry groups and the media to underscore the need to keep workers safe from the hazards of heat. "The agency is already investigating several heat-related deaths of workers this summer," said OSHA Assistant Secretary Dr. David Michaels. "Every heat-related death we investigate was preventable, in most cases by simply providing water, rest and shade."

The call featured several employers and employer groups that are making noteworthy efforts to protect workers. They included Safety Director Anthony Hargis of the [National Waste and Recycling Association](#), which sponsored heat-safety standowns last month that involved about 70% of the nation's waste collection companies. Safety officials from a steel plant, a lumber mill and a construction company also described their efforts, which included providing cooling vests and shade canopies. Dr. Michaels invited all on the call to join the conversation on Twitter using [#WaterRestShade](#). An audio recording and transcript of the call, along with other resources, are available on OSHA's [heat webpage](#).

In addition, OSHA is hosting [heat stand-downs](#) in eight Southern states from June 27 to July 1.

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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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