

Inside the Issue

- Testing Your Safety Interlock Systems?- 9
- OSHA Quicktakes – 18
- Domtar's Journey with Human Performance Improvement- 24
- Legal Corner – 30
- PPSA Committees – 36
- PPSA Board of Directors – 42
- About PPSA – 47

A Letter From Our Chair

John Deveau
Safety Manager - Containerboard Mills
WestRock



Thank you for your continued support of PPSA! Our board and member supported committees continue to work on bringing value to our members. We just wanted to share a few updates regarding our committees:

- The Conference Committee has begun planning for the 2018 PPSA Annual Conference which will be the anticipated 75th anniversary celebration. It will take place on June 17 - 20 at The Vinoy Renaissance Resort & Golf Club in St. Petersburg, FL. They are in the process of developing the program and evaluating speakers.
- The Awards Committee is continuing to assess 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 will be holding a Contractor Safety Workshop on January 30-31, 2018 in Norcross, GA so stay tuned as registration is opening soon!
- The Communications Committee has done a great job on the quarterly reports. The committee has worked hard over the past year to improve the content and quality of the website and quarterly reports.

Please remember to visit our [website](http://www.ppsa.org) for the latest news and updates regarding the association. We offer various products and training that have special member pricing.

As always, PPSA is here to serve its members! If you ever have a suggestion or need anything from us, please do not hesitate to contact us.

Stay Safe!

Best Regards,
John Deveau, PPSA Board Chair



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Testing Your Safety Interlock Systems?

Submitted by: James, W. Darrow, Ph.D., FMP, CHMM: HRP Associates Inc.

DEF: Safety Interlock: Device or means that places a machine or machine component into a zero, or substantially reduced danger-mode upon intent to access; or a device or means that will actively prevent access to a hazard upon intended access. (Example: an interlocked clothes dryer door, that upon opening will quickly stop high speed rotation of the drum; or a clothes dryer door that will not allow intended access during high speed mode of operation.)^{1,2}

Question: How often do safety interlock devices need to be tested? (What is the testing frequency?)

Short answer – Unfortunately, it depends. OSHA tells us to follow manufacturer's testing frequency instructions if available. (This is probably the best option, if you can obtain these). Otherwise, when no manufacturer instructions exist, there appears to be some latitude as to testing frequency, but you must base your inspection (and testing) program on "recognized and generally accepted engineering experience" and base it on the individual risk assessment for that particular piece of equipment. OSHA's General Duty Clause will often be applied during regulatory audits, if regulatory specifics are not provided elsewhere (such as those detailed in 29 CFR 1910.261, specific for the Pulp & Paper Industry).

Recommendation - follow:

- Federal or State OSHA requirements for that specific piece or type of equipment, if these exist;
- Original equipment manufacturer (OEM) specifications/instructions; and
- Recognized and good engineering practices
 - Some potential sources for standards and guidance:
 - ISO 14119 on Interlocks – recommends testing every time the device changes state, or at least every month for high risk situations if only you intermittently use the equipment in question.
 - ANSI B65.1 and ANSI B65.2, originally for web- and sheet-fed printing presses and binding and finishing equipment,
 - ANSI/NFPA 86-2003, *Standard for Ovens and Furnaces*
 - ANSI/ISA-84.00.01-2004 Parts 1-3 (IEC 61511 Mod) used in PSM, *Application of Safety Instrumented Systems for the Process Industries*. (Generally accepted, good engineering practice)
 - ANSI ASSE Z244.1-2003 (R2008), Specifically for control of hazardous energy, but it discusses self-checking or monitoring to ensure the integrity and performance of control circuits
 - ANSI /SPI B151.21 – 2003 (for certain plastic manufacturing equipment), there is added detail about the use of self-monitoring interlocks
 - EN ISO 13849-1 (2009), testing interlocks and other safety components/systems
 - ISO 13489, section 4, design of safe machine control systems

Continued on page 10

Continued from page 9

- ***“The periodic test interval is depending on the application: The checking interval can be established or based on the operating cycle or the machine cycle. It is important that the interval is suitable for [the] application. The checking interval needs to be evaluated/determined during the risk assessment for the application.” (ISO 13489.4)***

Ultimately, there is no “one size fits all” recommended interlock testing frequency. You need to first perform a hazardous assessment for each piece of equipment, identifying hazardous motion hazards among others, and base the interlock testing frequency on the severity of consequence and frequency of risk exposure using good engineering practices and standards as your guiding principal. If available, make sure to follow machine specific guidance available from either the OEM or any regulatory agencies. (For additional reading, I recommend Gary Hutter’s detailed article on the subject for the National Safety Council.)

NSI/SPI B151.21-2003 Defines an interlock as “An arrangement whereby the status of one control or mechanism allows or prevents the operation of another.” ANSI B11.19 for Machine Tools – 1990, uses similar language.

MACHINERY SAFETY SURVEY RESULTS: Safety Interlocks and Used Equipment

BY: Gary Hutter, P.E., Ph.D., C.S.P. (National Safety Council) www.nsc.org/NSCDocuments_Advocacy/Machinery-Safety-Survey-Results.docx

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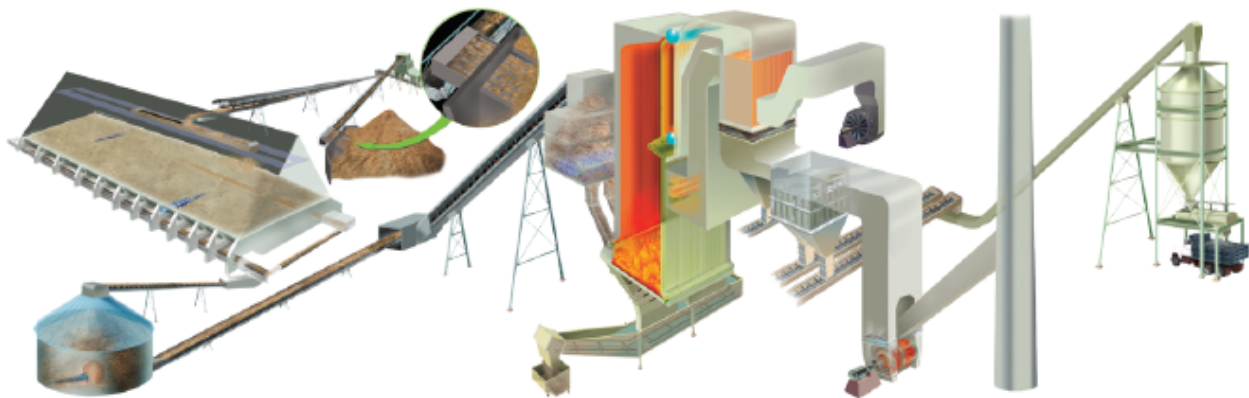


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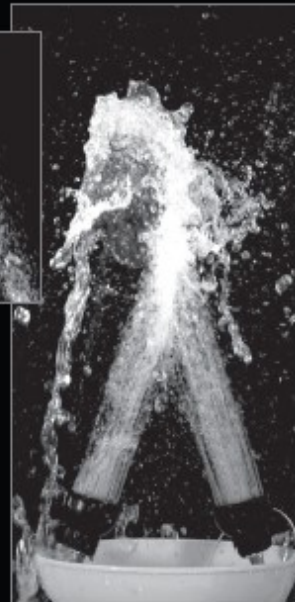
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OSHA QuickTakes

October 3, 2017
Volume 16, Issue 18

OSHA Memorandum Outlines 30-Day Enforcement Plan for Silica Construction Standard

Enforcement of OSHA's [respirable crystalline silica standard for construction](#) went into effect on Sept. 23. The agency announced in a [September 20 memorandum](#) a 30-day enforcement phase-in to help employers comply with the new standard. Citations may be considered for employers not making any efforts to comply. For more information on silica hazards and OSHA's standard, visit the [Silica Final Rule webpage](#).

OSHA alliance partners commit to better protect worker safety and health

The [OSHA Alliance Program](#) fosters collaborative relationships with groups committed to worker safety and health. Alliance partners help OSHA reach targeted audiences, such as employers and workers in high-hazard industries, and give them better access to workplace safety and health tools and information.

- The [U.S. Forest Service-Northern Division and the National Federation of Federal Employees-Northern](#) signed a [two-year agreement](#) to promote safe practices in Montana and North and South Dakota's forestry, logging, firefighting, and natural resource industries. More information is available in the [news release](#).
- The [Consulate General of Honduras in Chicago](#) signed a [two-year agreement](#) to provide Honduran nationals in Ohio, Illinois, Indiana, Michigan, Minnesota, and Wisconsin with guidance, education, and training on workplace safety. These resources will explain the rights of workers and the responsibilities of employers under the Occupational Safety and Health Act.

New Fact Sheets Available on Protecting Workers in Laboratories and Shipyards

Two new OSHA fact sheets provide information on assessing and preventing hazards in specific worksites.

- [Preventing and Managing Laboratory Worker Exposure to Zika Virus](#) provides guidance on protecting workers in biomedical laboratories from infection by the virus. It includes information on performing risk assessments and standard biosafety practices for laboratory work involving pathogens.
- [Evaluating Shipyard Competent Person Programs](#) is aimed at protecting shipyard workers from exposure to dangerous atmospheres, particularly in or around confined and/or enclosed spaces aboard vessels. The fact sheet offers guidance on determining the necessary qualifications of experts who must be employed to determine whether a confined space is safe for workers and prescribe protective measures.

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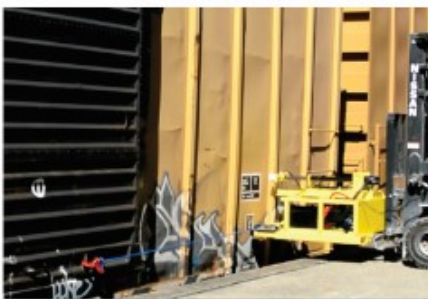


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Domtar's Journey with Human Performance Improvement

Submitted by: Larry Warren, Domtar

Domtar has been on a journey with Human Performance Improvement since 2013. Our involvement was a result of the Pulp and Paper Safety Association conference in Williamsburg VA which focused on human behavior. There were a number of topics and presenters there to discuss the subject but the Introduction to Human Performance that was presented by Shane Bush resounded with a number of the Domtar attendees present at that meeting. That exposure resulted in the undertaking of Human Performance Improvement within Domtar.

Human Performance Improvement (HPI) material is based on the work cataloged by the US Department of Energy. Much of this material was drawn from the work in the nuclear power generation industry in an attempt to reduce the likelihood of an unplanned event (error) and the potential for a catastrophic result. As such, those manuals are available on-line free of charge. However, our experience would indicate that attempting to undertake this effort without the support of a subject matter professional would not be recommended. The learning curve would be too long to get to the point of beginning to make a positive impact on the organization.

HPI involves three major areas – Philosophy, Investigation, and Error Reduction tools. Early on in our journey, the investigation tool was often mistakenly thought of as the most important portion. However, our evolution has indicated that understanding and application of the philosophy is probably the most impactful though that understanding partially came through training and partially flowed out of the results of investigations.

At a very high level, the philosophy of HPI involves the following thoughts:

- All humans are fallible and even the best make mistakes
- Not about fixing the worker – “blame, shame, retrain”
- Errors - something you did not intend to do -are predictable, preventable, and manageable
- Individual performance is influenced by organization processes and values
- It is possible to reduce future error occurrences and minimize the impact of those that occur
- A Just Culture - how employees are treated, responding appropriately to errors, and becoming a learning organization – is critical.

The investigation process builds on the philosophy. If errors are something people did not intend to do, what was it – the context – that resulted in their decision to act in that way at that point in time? Part of the investigation process deals with determining the error precursors that were present that may have led to the decision that resulted in the unwanted outcome. A key part of the investigation process focuses on determining the gap between work as imagined – what leaders thought or expected to be going on – and work as actually performed or what was actually happening. The decisions around the event are analyzed through a Just Culture Decision tree. In our journey, the Just Culture Decision Tree often sheds light on the reasons for the above gap. At a high level, about 55% of events are the result of some latent organizational weakness. It requires strong leadership integrity and commitment to deal appropriately with these findings otherwise you can fall into one of the traps that have resulted in HPI failing in some organizations. A final piece of the investigation process is the creation of effective corrective actions to truly eliminate the gap between work as imagined and performed in order to reduce the likelihood of a future occurrence.

Continued on page 25

The third major portion of HPI is around error reduction and prevention tools. Since error likely situations are predictable and the development of Just Culture allows employees to identify situations where there are concerns regarding the potential for unwanted outcomes, tools and practices can be deployed to reduce the likelihood of undesirable results. In our journey, this has been the third piece of the puzzle and we are now beginning to apply more focus and effort in this area in order to proactively prevent issues rather than reactively respond to issues.

In retrospect, Domtar's experience in terms of flow, development, and understanding is probably to be expected. As an organization begins the implementation, the training and deployment of the investigation methods can happen fairly quickly. Even though people are exposed to the philosophy as part of the training, it takes some time for that to begin to take hold during which investigations are being conducted. Those investigation results will be seen as valuable and more than likely eye opening. It is later in the process with a deeper understanding that the value in both the philosophy and error reduction tools becomes more apparent.

Key watch outs for an HPI implementation:

- Not just a "safety program" – HPI is about human behavior which impacts everything humans do
- Cannot become a "get out of jail free" – it does not mean no one is accountable but it may result in accountability often miss applied to the injured employee being applied elsewhere
- Cannot do an HPI investigation on every error due to the resource consumption so you must be diligent in applying it where the potential for significant negative outcomes exist – especially life altering injuries.
- It requires leadership commitment and consistency over time to allow the culture to develop while the investigation outcomes highlight opportunities to create more effective barriers to errors i.e. eliminate latent organizational weaknesses.

Outlined here are some of the learnings and understandings that have resulted from the significant time and effort that has been expended at Domtar on understanding human performance and building a more highly reliable organization. Hopefully this information is both encouraging to those who may be at the place where HPI makes sense and informative so that you can avoid some of the rough road that we have traveled. Domtar's journey with Human Performance Improvement has been the most influential portion of our growing understanding of human behavior and the impact on our overall and specifically safety performance as a part of the never-ending efforts to prevent human pain and suffering. This growth would not have been possible had it not been for the PPSA, Shane Bush, and all the employees at Domtar who have expended much time and effort on this. Many thanks to all.

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SO WHAT'S UP WITH OSHA?
 Submitted by: Eric Hobbs

Like everything else in Washington, OSHA is in flux. What does that mean, and what does it mean for pulp and paper industry employers?

As an enforcement matter, little at OSHA has changed in the past ten months. Aside from a significant shortfall in field personnel, given attrition and the Administration's only recently lifted hiring freeze, enforcement as a result of inspections continues to appear much as it was under the Obama Administration. The earmark of an "interim" federal agency is its firm commitment to the status quo. So the fact that OSHA appears to be acting in the field as if nothing really has changed since January 20 should not surprise anyone. The Agency is still inspecting in accordance with its emphasis programs; under the fatality, amputation and loss-of-eye reporting rule; based upon complaints; and based upon referrals. And the citations and proposed penalties that are flowing from those inspections look a lot like they did before January 20.

OSHA's position on rulemaking, which is a matter of policy set by higher-ups, rather than of enforcement executed by the field, however, *has* changed. Gone from the Agency's regulatory agenda, as of this Fall, are a proposed Hazard Communication Standard update and pre-rule activity on combustible dust, bloodborne pathogens, back-over injuries and fatalities, emergency response preparedness, and an update of the Hearing Conservation Standard. The agenda also affirmatively includes rulemaking in the form of a potential pull-back of OSHA's controversial Improve Tracking of Workplace Injuries and Illnesses rule, also referred to as the "Electronic Recordkeeping rule". Of course, no one questions that there will be less regulatory activity under the Trump Administration than there was under the Obama Administration.

Not more has changed at OSHA since President Trump took office primarily because he has not yet nominated a new Assistant Secretary of Labor for OSHA. The Agency's two Deputy Assistant Secretaries, Tom Galassi (the acting career Deputy) and Loren Sweatt (the political/appointed deputy), are in charge. And, again, they are not going to "rock the boat" or to make significant changes in OSHA's direction unless and until either a new OSHA chief is nominated and confirmed or the Secretary of Labor, Alex Acosta, directs such change. And the Secretary is unlikely to do so.

Continued on page 36

Continued from page 30

Rocking the boat includes, among other things, implementing changes in enforcement based on new standards and rules. So the Agency has postponed several regulatory due dates and enforcement dates and, behind the scenes, is reconsidering its position in a few lawsuits challenging all but one of its recent new standards and rules. On June 27, the agency postponed until December 1 the first due date for employers' electronic submission of injury and illness data under the Improve Tracking of Workplace Injuries and Illnesses rule. In April, the Agency delayed for three months, until September 23, enforcement of its new Silica Standard in construction. And Mr. Galassi, in a September 20 Memorandum to OSHA's Regional Administrators, announced that, during the first 30 days of the Standard's enforcement in construction, "OSHA will carefully evaluate good faith efforts taken by employers in their attempts to meet the new construction Silica Standard" and provide inspection and citation guidance during that period. OSHA also has proposed limiting the application of its new Beryllium Standard when it comes to construction and shipyards. That Standard took effect in those industries May 20. And OSHA has delayed by one year, to November 10, 2018, the enforcement date for the crane operator certification requirement.

The whole of the Beryllium Standard is facing a challenge before the Eighth Circuit Court of Appeals, which has postponed due dates for OSHA's briefs in support of the Standard's legality several times, most recently until October 18, while the Trump Administration reconsiders its litigation position. And the two federal district courts in Dallas and Oklahoma City that are considering legal challenges to the Improve Tracking of Workplace Injuries and Illnesses rule have stayed proceedings in those cases, as well, pending the Administration's decision as to how, if at all, to continue to fight the lawsuits.

All those delays, postponements and stays highlight the position of status quo – or maybe one should call it "limbo" – in which OSHA comfortably finds itself. "Don't change a thing" might be said to be the Agency's motto. And, again, nothing is going to change until a new OSHA head takes his or her seat at the desk in the Frances Perkins Building in Washington.

Until then, Congress continues to argue over whether it should reduce OSHA's funding, condition the Agency's allocation on non-enforcement of the Improve Tracking of Workplace Injuries and Illnesses rule or direct that fewer dollars be committed to enforcement and more to compliance assistance and grants. But, of course, Congress cannot even agree on a new budget as a whole.

Everyone in the OSHA-regulated community finds himself or herself at a disadvantage when the Agency is without a leader. Necessary change and progress slow to a halt, and OSHA personnel in the field are left to stay the old course under the leadership of deputy heads who deem it inappropriate to change that course. Our only hope for progress at OSHA, however one might define it, is the nomination and confirmation of a new Deputy Assistant Secretary of Labor. In the meantime, as they say, what is old is new again.

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PPSA Committees

Below is an update of the current members, roles and responsibilities of the PPSA Committees. Everyone on these committees volunteer their time to provide the most beneficial services for all members. The Association appreciates their dedication and support which could not be without the support of each of their companies.

Executive Committee - john.deveau@westrock.com

The Executive Committee responsibilities include Financial Committee and review PPSA's accounts and annual budgets.

Members: John Deveau, WestRock (Chair), Paul Bierley, Domtar, Steve Gearheart, New-Indy Containerboard, Matthew Kanneberg, WestRock. Ashley Westbrook, PPSA Staff

Current Activity: Reviewing the financial needs of the association to maintain overall stability. They continue ensuring the association operates within the current bylaws.

Conference Committee - paul.bierley@domtar.com

The Conference and Sponsorship Committee is responsible for planning the annual conference and managing the sponsorship for the conference.

Members: Paul Bierley, Domtar (Chair), John Deveau, WestRock, Tim Elizondo, WestRock, Matthew Kanneberg, WestRock, Shawn Powell, Brady Corporation, Ashley Westbrook, PPSA Staff

Current Activity: Finalizing the conference agenda, securing speakers for selected topics and developing conference events.

Membership and Vendor Committee - randy_adams@ktgusa.com

The Membership and Vendor Committee is responsible for both Company and vendor of PPSA membership.

Members: Randy Adams, Kruger (Chair), Paul Bucek, Green Bay Packaging, Paul Bierley, Domtar, John Deveau, WestRock, Tim Kubly, Rite-Hite Corporation, Ashley Westbrook, PPSA Staff

Current Activity: After recently completing a member satisfaction survey, the committee is evaluating responses with the goals of retaining current members as well as growing the PPSA with new members, service providers, and product vendors. This committee looks for ways to enhance member satisfaction and the overall value of a PPSA membership including providing our membership access to safety vendors with state-of-the art technology, products and services.

Educational Development - larry.warren@domtar.com

The Education Development Committee is responsible for developing courses for PPSA members and non-members

Members: Larry Warren, Domtar (Chair), Matthew Kanneberg, WestRock, Larry Kilian, Haws Corporation, Shawn Powell, Brady Corporation, Ashley Westbrook, PPSA Staff

Current Activity: The committee is working on several initiatives:

Continued on page 37

Continued from page 36

- finalizing the details for upcoming continuing education opportunities such as course offerings and webinars
 - ◊ Emphasizing industry specific products, services, and content for tactical application
 - ◊ Offering general industry better practices for strategic direction
- seeking opportunities to leverage the educational capabilities and efforts of PPSA across the industry:
 - ◊ Creating joint marketing of educational opportunities with other industry associations
 - ◊ Supporting the educational needs in the efforts on the industry wide effort on Serious Injury and Fatality prevention (SIF)

Awards and Nominations - steve.gearheart@new-indycb.com

The Awards and Nominating Committee is responsible for executing the awards throughout the entire year. It includes but not limited to, the Executive Eagle, Distinguished Service, and Safety Committee/Team awards. This committee will also be responsible for seeking out and recommending new Board Members

Members: Steve Gearheart, New-Indy Containerboard (Chair), Randy Adams, Kruger Products, Pete Masias, Green Bay Packaging, Ashley Westbrook, PPSA Staff

Current Activity: The committee is reviewing the criteria of the current awards recognized at the annual conference and potential addition of additional awards and recognition of our members and sites.

Communications Committee - john.deveau@westrock.com

This committee is responsible for providing content for the various publications and non-event content outlets.

Members: John Deveau, WestRock (Chair), Steve Gearheart, New-Indy Containerboard, Lesley Galloway, SafeStart, Ashley Westbrook, PPSA Staff

Current Activity: Reviewing the current Quarterly Report newsletter. They're also have the responsibility for updating the website and soliciting articles for the next (QR) from members and vendors. We are looking at different means of social media to provide information and updates to our membership.

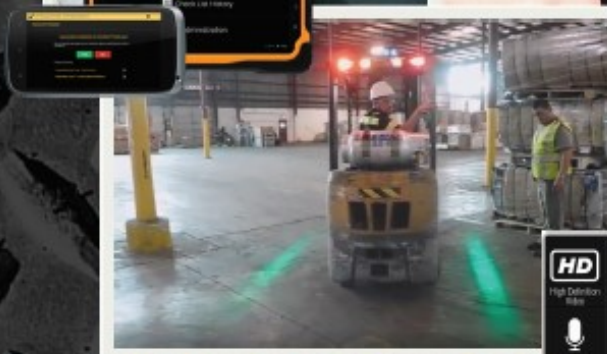
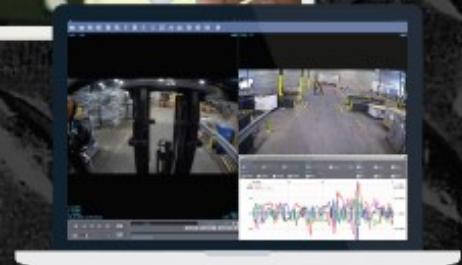
As a member of this association, you are encouraged to provide feedback to the committees either by contacting the chairs directly or contacting **staff**. Please **contact** PPSA if you would like to join a committee as well.

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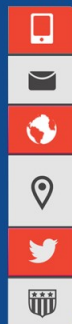
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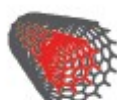
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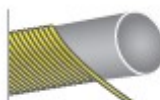
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- Participation in our webinars and training seminars.
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- The annual Conference provides a great face-to-face networking opportunity.
- The Quarterly Report provides a way of bench-marking your own performance with others in similar operations.
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- The Association is an excellent forum for keeping up with latest OSHA standards. In-depth information on specific subjects is increasingly available at regional seminars. The cost of these seminars is minimized by virtue of holding them on a regional basis.
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Continued on page 22