

## **QUARTERLY** REPORT

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December 2017

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#### A Letter From Our Chair

John Deveau Safety Manager - Containerboard Mills WestRock



4th Quarter 2017

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 Education Committee maintains its efforts to seek out continuing education opportunities through course offerings and webinars. We will be holding a Contractor Safety Course on January 30 - 31, 2018 in Norcross, GA! Registration is now open, and you can register <u>here</u>.
- The Conference Committee is continuing to plan the 2018 PPSA Annual Conference which will be the anticipated 75<sup>th</sup> anniversary celebration. It will take place on June 17 20, 2018 at The Vinoy Renaissance Resort & Golf Club in St. Petersburg, FL. The program is coming together nicely and the committee is working to secure several outstanding speakers.
- The Awards Committee and the Board of Directors are working diligently to make sure that PPSA is keeping with the best standards of the industry. They have reevaluated some of PPSA's awards in order to ensure that PPSA continues to recognize the top leaders in the industry.
- 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 quarterly reports and website.

Please remember to visit our <u>website</u> for the latest news and updates regarding PPSA. 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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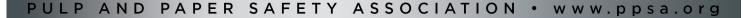
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## Walking-Working Surfaces and

#### **Personal Fall Protection Systems**

Hopefully, you all been working on OSHA's final rule on <u>Walking-Working Surfaces and Personal Fall</u> <u>Protection Systems</u> that took effect this year. The purpose was to better protect workers in general industry from these hazards by updating and clarifying standards and adding training and inspection requirements. The rule incorporated advances in technology, some industry best practices, and national consensus standards that was to provide effective and cost-efficient worker protection. Specifically, it updated general industry standards addressing slip, trip, and fall hazards (subpart D), and adds requirements for personal fall protection systems (subpart I).

The rule supposedly gave employers some benefits by providing greater flexibility in choosing a fall protection system. "For example, it eliminates the existing mandate to use guardrails as a primary fall protection method and allows employers to choose from accepted fall protection systems they believe will work best in a particular situation - an approach that has been successful in the construction industry since 1994". (osha.gov) Plus the final rule allows us to use non-conventional fall protection in certain situations.

The final rule became effective January 17, 2017, 60 days after publication in the Federal Register. There is also a time line on that certain provisions were to meet fill compliance. Also, there are some that you will need to ensure you are meeting.

#### As a friendly reminder below are the provisions that hopefully you were aware of and meet:

- Ensuring exposed workers are trained on fall hazards (May 17, 2017),
- Ensuring workers who use equipment covered by the final rule are trained (May 17, 2017),
- Inspecting and certifying permanent anchorages for rope descent systems (November 20, 2017),

#### These will need to be meet this year:

- Installing personal fall arrest or ladder safety systems on new fixed ladders over 24 feet and on replacement ladders/ladder sections, including fixed ladders on outdoor advertising structures (November 19, 2018),
- Ensuring existing fixed ladders over 24 feet, including those on outdoor advertising structures, are equipped with a cage, well, personal fall arrest system, or ladder safety system (November 19, 2018), and

#### Then 2036:

• Replacing cages and wells (used as fall protection) with ladder safety or personal fall arrest systems on all fixed ladders over 24 feet (November 18, 2036).

Thank you to all who participated in the 2017 PPSA Membership Satisfaction Survey.



Congratulations to our Gift Card winners: Lori Ready, Clearwater Paper Corporation, and Michael Olson, Kapstone Paper.

## **Contractor Safety Course**

**Jan. 30 – 31, 2018** Hyatt Place Norcross, GA

This two-day course will provide various perspectives on minimum requirements and better practices related to safe execution of work performed by contractors within the pulp and paper industry. Join the conversation on what the necessities are for the contracting companies and the companies employing contractors to execute projects safely.

#### WHO SHOULD ATTEND?

- Company representatives responsible for the development, implementation, and management of contractor safety programs
- Site managers responsible for contractor safety at the site
- Contractor company representatives responsible for the development and implementation of safety expectations, policies, and training for contractor employees
- Field managers/superintendents responsible for the safe execution of work onsite

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Register by **January 15, 2018** for Early Bird Registration Rates. Early Bird Registration Rates are \$450 for members and \$695 for nonmembers.

(For questions, please contact Ashley Westbrook, PPSA Member Relations Manager at <u>awestbrook@ppsa.org</u>, 770.209.7284.)



For Registration visit <u>http://www.ppsa.org/2018-course</u>



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PPSA Membership,

In an ever changing safety culture throughout the paper industry, we strive to maintain an injury free status at our respective facilities by focusing on the lagging indicator data.

The PPSA board of directors elected to take the leadership role in the pulp and paper industry to place the well-deserved recognition on the PPSA membership companies and/or facilities that are trending toward the preventing the serious injury and fatalities (SIF).

Effective in 2018, the PPSA will no longer distribute the lagging indicator awards, Best Record, Most Improved and No OSHA Recordable, at the PPSA awards banquet. However, we will continue with the Innovator, Outstanding Safety Committee, 3 year sustainability, Executive Eagle and Distinguished Service awards.

The awards committee will establish new leading indicator/ recognition awards that contribute to the prevention of SIF's.

We would like to thank all of the PPSA membership companies in advance for helping make the PPSA a safety leader in the Pulp and Paper Industry.

Steve Gearheart PPSA Awards Committee Chairman



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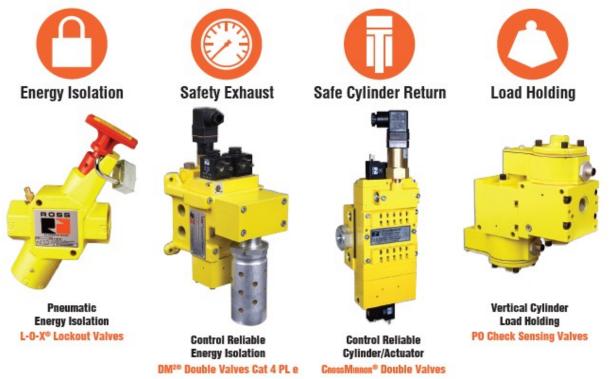
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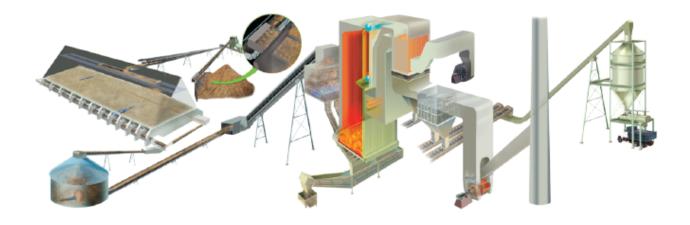


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#### **OSHA QuickTakes**

December 1, 2017 Volume 16, Issue 22

#### OSHA Warns of Hazards When Using Roof Tarping in Hurricane Recovery Work

Reinforced plastic tarps, commonly called "Blue Roofs," provide temporary protection for the roofs of homes and other buildings damaged during severe weather such as a hurricane or tornado. When employees access roofs to install these tarps, they are at risk of falls, electrocutions, and other hazards. In a new <u>fact sheet</u>, OSHA recommends steps that employers can follow to help keep workers safe.

## OSHA, ISEA Team Up to Distribute Safety Equipment to Protect Hurricane Cleanup, Recovery Workers

Although the hurricanes are over, their impact continues with hazardous and unstable conditions for both residents, and cleanup and recovery workers. OSHA and the International Safety Equipment Association (ISEA) are teaming up to coordinate and distribute much-needed personal protective equipment to hurricane-affected areas in Texas and the Caribbean Basin, including Puerto Rico. "OSHA's goal is to keep workers and volunteers safe while they perform cleanup and recovery operations, and the ISEA is an important partner in these efforts," said Deputy Assistant Secretary of Labor for Occupational Safety and Health Loren Sweatt. Information on specific safety equipment and how to stay safe during storm cleanup and recovery can be found on OSHA's <u>Hurricane Preparedness and Response</u> page, and on the <u>ISEA Storm Cleanup</u>: <u>Safety Equipment Resource Center</u> page.

#### **OSHA Training Institute Celebrates 25th Anniversary of Education Centers**

The <u>OSHA Training Institute</u> (OTI) is celebrating the 25th anniversary of its education center program this year. OTI Education Centers have grown from four to 39 non-profit organizations, offering training on OSHA standards, and occupational safety and health issues to workers and employers nationwide. During their 25-year history, the education centers have trained more than 600,000 students in areas of high injury and illness rates. To find the nearest education center, visit the <u>OTI Education Center Locations</u> page.

#### Idaho Tea Distributor Reduces Injuries with Help from OSHA's On-Site Consultation Program

R.C. Bigelow is a marketer of blended teas headquartered in Fairfield, Conn. The company's Boise, Idaho, distribution facility contacted OSHA's <u>On-Site Consultation Program</u> for help lowering its rate of recordable injuries. Bigelow used the consultation visit to begin a team approach to instilling ownership of safety practices and principles at all levels of the organization. The company has since reduced its injury and illness rates below the industry national average. This dedication to protecting workers earned it acceptance into OSHA's <u>Safety and Health Achievement Recognition Program</u>, which recognizes small businesses that operate an exemplary safety and health program. For more information, see Bigelow's <u>success story</u>.

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#### OSHA Standards Training Requirements

Training to OSHA requirements can be challenging with the terms used throughout the standards. I, like most in my opinion, look in the training section first, but we all need to be careful not to rely on this section to inform us of all the required training within a standard. There are other "BUZZ" words to be looking for such as: Instructed, taught, qualified, etc...

There is a 270-page guidance document "OSHA 2254-09R 2015" on OSHA's website that I would encourage you all to download to assist you on ensuring you are meeting the minimum training requirements established by OSHA, and, more importantly, that you are providing the training to keep your folks safe.

The guidance document is not a standard or regulation, it creates no new or additional legal obligations. However, it does contain descriptions of mandatory safety and health standards. Therefore, you cannot rely solely on this document in understanding all of the training requirements, but I believe you will find it helpful.

Link: https://www.osha.gov/Publications/osha2254.pdf

OSHA's disclaimer: This publication provides a general overview of a variety of standards related topics. This publication does not alter or determine compliance responsibilities which are set forth in OSHA standards, and the Occupational Safety and Health Act. Moreover, because interpretations and enforcement policy may change over time, for additional guidance on OSHA compliance requirements, the reader should consult current administrative interpretations and decisions by the Occupational Safety and Health Review Commission and the courts.



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#### Legal Corner Managing the Hazards of Compressed Oxygen Cylinders Submitted by: Lawrence P. Halprin, Keller and Heckman LLP

A recent Review Commission ALJ decision<sup>1</sup> vacating an OSHA citation could simply be viewed as one where OSHA failed to carry its burden of proof, but it might better be viewed as a reminder of a fire hazard that may not be adequately addressed by some facilities in properly storing, handling and using oxygen cylinders.

During an inspection of a construction project at a medical center, the OSHA inspector found a 2compartment cage built by the welding contractor with at least ten liquid petroleum cylinders in the left compartment and two oxygen cylinders in the right compartment. The two compartments were separated by two 1/8inch steel barriers separated from each other by 2 inches of air. Both barriers were taller than 5 feet. OSHA cited the welding contractor for an alleged violation of the OSHA welding standard for construction, 29 C.F.R. § 1926.350(a)(10), which states:

Oxygen cylinders in storage shall be separated from fuel-gas cylinders or combustible materials (especially oil or grease), a minimum distance of 20 feet (6.1 m) or by a noncombustible barrier at least 5 feet (1.5 m) high having a fire-resistance rating of at least one-half hour.

Under well-established case law, to sustain a violation, OSHA must establish the following elements by a preponderance of the evidence: (1) the cited standard applies to the facts; (2) the requirements of the standard were not met; (3) employees had access to the hazardous condition; and (4) the employer knew or could have known of the hazardous condition with the exercise of reasonable diligence. There was no dispute with respect to the issues of employee access (element 3) or employer knowledge (element 4). There was a dispute as to whether the standard applied (i.e., whether the cylinders were "in storage") and, if so, whether there was non-compliance (i.e., whether the steel barriers had a fire-resistance rating of at least one-half hour.)

It is important to note that OSHA's General Industry standard for welding, 29 CFR 1910.253(b)(4)(iii)<sup>2</sup>, contains language identical to the cited construction standard, but, due to additional language in related sections of the General Industry standard, is given a different interpretation. Oxygen cylinders in general industry workplaces are not considered to be "in storage" when they are either "in use" or "connected for use". However, in the construction industry, an oxygen cylinder is considered to be in use only when gas is being drawn or it is reasonably anticipated that gas will be drawn from the cylinder within 24 hours<sup>3</sup>.

<sup>3</sup>May 10, 2006 OSHA Letter of Interpretation to Bill Trammell. https://www.osha.gov/pls/oshaweb/ owadisp.show\_document?p\_table=INTERPRETATIONS&p\_id=25371. OSHA

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<sup>&</sup>lt;sup>1</sup>Secretary of Labor v. The Thomas J. Dyer Company, OSHRC Docket No. 17-0950 (October 5, 2017) https:// www.oshrc.gov/documentlisting/?CategoryId=2&DocYear=2017

<sup>&</sup>lt;sup>2</sup>29 CFR 1910.253(b)(4)(iii) provides: "Oxygen cylinders in storage shall be separated from fuel-gas cylinders or combustible materials (especially oil or grease), a minimum distance of 20 feet (6.1 m) or by a noncombustible barrier at least 5 feet (1.5 m) high having a fire-resistance rating of at least one-half hour."

#### Continued from page 30

OSHA's longstanding position is that "whether it is 'reasonably anticipated'" that gas will be drawn within 24 hours is based on whether specific welding or cutting work is planned for that period and the number of gas cylinders expected to be required to do that work." The judge held that OSHA had the burden of proof on this issue and did not produced any evidence regarding the welding contractors intended use of the cylinders within the relevant twenty-four hour period. In contrast, the hearing record showed that the welding contractor was performing welding activities daily and the cage was accessed as needed throughout the day. Based on the record, the judge held that it was reasonably anticipated that gas would be drawn from the cylinder during the next 24 hours, and therefore, the cylinders were not considered to be in storage, and the cited standard did not apply.

While the judge could have vacated the citation on that ground, he went on to hold that, even if the cited standard did apply, OSHA had not demonstrated that the barrier between the two compartments had a fire-resistance rating of less than one-half hour. According to the judge, the parties conceded the barriers were "made of noncombustible steel, and … exceeded the 5-foot tall requirement." OSHA asserted that it did not need to test or otherwise analyze the fire resistance of the barriers in the welding contractors cage, but could rely on the following excerpt from an internal OSHA "interpretative guidance" memorandum (the June 30, 2006, *Memorandum on Interpretation for Fire Resistance Ratings for Metal*) stating that a 1/2-inch thick solid steel barrier would not provide at least 1/2-hour fire resistance:

In fact, a solid mild steel plate barrier, ½-inch thick, would fail to meet the fire-resistance rating for ½-hour (see attached memorandum, dated July 15, 1982). To obtain a ½-hour fire-resistance rating criteria, the most common materials used are plaster (cement, lime, and perlite) fillers, and mineral wool fillers. For example, a fire barrier (solid partition) would be comprised of metal lath on ¾-inch steel channels, combined with a 2-inch thick cement plaster (see attached notes titled, 1910.253- Welding, Cutting and Brazing). Solid mild steel plate barriers combined with plaster fillers such as concrete provide a higher protection factor that meet or exceed the ½-hour fire-resistance rating, because concrete has low thermal conductivity and capacity properties.

Based on the above information, solid mild steel plate barriers,  $\frac{1}{2}$ -inch thick, used alone would not meet OSHA's  $\frac{1}{2}$ -hour requirements. However, a combination of materials used in conjunction with solid mild steel plate barriers would achieve the  $\frac{1}{2}$ -hour fire-resistance rating criteria. Therefore, any material used that meets or exceeds the  $\frac{1}{2}$ -hour fire-resistance rating would be in compliance and acceptable for 29 CFR 1910.253(b)(4)(iii).

OSHA asserted that if a 1/2-inch thick solid steel barrier was inadequate, then the 1/4-inch barrier used by the welding contractor did not provide the appropriate fire resistance. The judge found no merit in this argument and indicated that OSHA would need to provide a fire-resistance analysis for the barrier based on a testing protocol validated by a professional engineer.

Continued on page 32

has also established a de minimis violation exception to the cited storage requirements for a single oxygen tank and a single acetylene tank on welding carts or secured to substantial vertical surfaces provided certain conditions are satisfied. See May 8, 2006 OSHA Letter of Interpretation to Kenneth J. Yotz. https://www.osha.gov/pls/oshaweb/ owadisp.show\_document?p\_table=INTERPRETATIONS&p\_id=25356

Continued from page 31

In a previous Review Commission ALJ decision addressing the same issue<sup>4</sup>, another the judge took the opposite view and accepted the June 30, 2006 OSHA memorandum as adequate evidence to establish that a <sup>1</sup>/<sub>4</sub> inch steel barrier was inadequate. The judge also upheld the citation on the alternative ground that there were one inch gaps between each end of the steel barrier and the frame of the rack so that the barrier was inade-quate.

In both cases, the fire resistance rating of the barrier was unknown. Neither OSHA nor the employer tested the barrier to determine its fire resistance rating or otherwise ascertained that it met the fire resistance rating required by the standard. Although OSHA has the burden of proof to establish a violation (i.e., that the barrier does not have a fire-resistance rating of at least one-half hour), the employer also has the obligation to test or otherwise ascertain that the barrier does have the required fire-resistance rating.

On a related note, although steel may be generally viewed as noncombustible, it can burn under certain conditions in the presence of high-pressure oxygen. There was a fairly recent incident in which high-pressure oxygen was introduced into a stainless-steel manifold containing room air and apparently, some dust particles, and a purge valve was opened at the same time to purge any contaminants from the piping. There was an ignition in the main isolation valve of the regulator on the manifold that resulted in a flash fire that consumed a portion of the stainless-steel regulator and the manifold. The most plausible explanation for the event is that there was small amount of combustible material in the piping that was ignited by the high velocity impact of the particles on the wall of the piping and the heat generated by the adiabtic compression of the oxygen, and that the heat of that combustion was sufficient to ignite the stainless steel. Because stainless steel supports combustion, the recognized standards for oxygen piping systems recommend the use of burn-resistant alloys of copper (e.g., brass) or nickel for high-pressure oxygen systems. One standard indicates that, depending on composition, the use of stainless steel requires oxygen velocity limitations at pressures as low as 200 psig and that all stainless steel requires oxygen velocity limitations at pressures above 375 psig<sup>5</sup>.

This article is intended to inform readers of recent developments and issues to consider in the field of workplace safety and health. It is not legal advice and may not be relied upon in determining whether a facility or activity is in compliance with applicable legal requirements.

Secretary of Labor v. National Steel Erection, Inc., OSHRC Docket No. 11-2467 (May 4, 2012).https://www.oshrc.gov/ documentlisting/?CategoryId=2&DocYear=2012

See Oxygen Pipeline and Piping Systems, IGC Doc 13/12/E (2012), Appendix D, European Industrial Gases Association AISBL; also published as AIGA 021/12, Asia Industrial Gases Association. <u>https://www.eiga.eu/index.php?</u> eID=dumpFile&t=f&f=2464&token=445f73d8905379110b9c1795d62fd76aac05ac3d

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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, Domar, 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 nonmembers

**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

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- 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, George Kolesar, Sonoco, 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, Joy Ausman, Clearwater Paper, 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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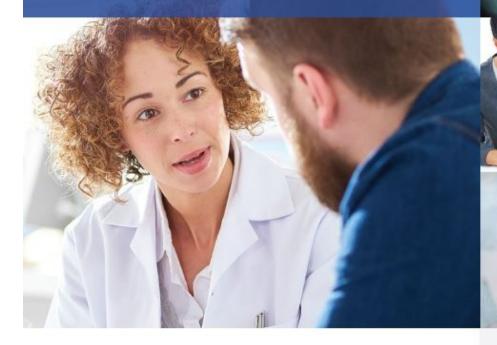
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#### About PPSA

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 <u>www.ppsa.org</u> for more information.

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