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A Letter From Our Chair

John Deveau
Safety Manager - Containerboard Mills
WestRock



The 74th Annual Safety & Health Conference in Charleston, South Carolina hit record attendance! Over 250 member and vendor attendees joined us at the beautiful Charleston Marriott hotel. The theme of the conference was “*Serious Injury and Fatality Prevention – Bringing the Industry Home Safe*” and based on conference evaluations all were very well received. We had 36 vendor companies on the exhibit floor that shared their great products and services as well as several spouses and families that enjoyed their time in Charleston. We are so thankful for the support of our member companies, corporate and vendor partners, as it would not be possible.

We would like to congratulate the many industry members who received awards during the awards dinner. Special congratulations to our Executive Eagle Award winner, Jim Porter. We are also excited to announce the 2017 Safety Innovator Award, WestRock Chattanooga location for their winning safety innovation: Slitter Blade Changing Jig and the Safety Committee/Team Award Winner from WestRock Nicholasville.

It's both an honor and a privilege for me to serve as your new Board Chairman. We will continue to focus on improving the quality of our member benefits. We truly are committed to bringing more value to our members and being an organization that drives proactive and leading safety efforts.

We continue to ask for your feedback and suggestions as we strive to improve. Also, please take a moment to ‘Save The Date’ on your calendar for the 2018 PPSA Safety & Health Conference in St. Petersburg, FL the week of June 17 - 20, 2018.

Best Regards,
John Deveau, PPSA Board Chair



SAVE THE DATE

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PPSA Annual Awards

No OSHA Recordable 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.

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.

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.

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.

Sustainability Award

This award is presented to all member locations that complete three calendar years without incurring an OSHA recordable injury and did not receive a top tier award during that time.

PPSA Distinguished Service Award

The PPSA Distinguished Service Award is the association's highest award for service, and may be presented annually to recognize leadership and service within the association. The winner will be announced at the Awards Banquet.

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.



74th Annual Safety & Health Conference


No OSHA Recordable Award

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The George Kress Foundation Inc.


Resolute Forest Products	WestRock	WestRock
100% Recycle Mill	Corrugated Box Plant without Corrugators	Corrugated Box Plant without Corrugators
Menominee Pulp Mill	GraphCorr	Des Moines Sheet Plant
Graphic Packaging International	WestRock	WestRock
100% Recycle Mill	Corrugated Box Plant without Corrugators	Corrugated Box Plant without Corrugators
Santa Clara	Atlanta East Sheet Plant	Kennesaw Sheet Plant
WestRock	WestRock	WestRock
100% Recycle Mill	Corrugated Box Plant without Corrugators	Corrugated Box Plant without Corrugators
Dallas Mill	Springfield, MA Sheet Plant	Highland Sheet Plant
Sonoco	WestRock	WestRock
100% Recycle Mill	Corrugated Box Plant without Corrugators	Corrugated Box Plant without Corrugators
Richmond	Fort Smith Sheet Plant	Caixa Pronta Curitiba
Green Bay	WestRock	WestRock
Coated Products	Corrugated Box Plant without Corrugators	Corrugated Box Plant without Corrugators
Winchester, VA	Rochester Sheet Plant	Caixa Pronta Sao Paulo
Green Bay	WestRock	Green Bay
Corrugated Box Plant without Corrugators	Corrugated Box Plant without Corrugators	Corrugated Box Plant with Corrugators
Chickasha, OK	Neenah Sheet Plant	Ft. Worth, TX
WestRock		
Corrugated Box Plant without Corrugators		
Gallatin Fulfillment		




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No OSHA Recordable Award

Green Bay
Corrugated Box Plant with
Corrugators

Midland Package

WestRock
Corrugated Box Plant with
Corrugators

Devens Container

WestRock
Corrugated Box Plant with
Corrugators

Monterrey MX Container

WestRock
Corrugated Box Plant with
Corrugators

Mexicali MX Container

WestRock
Corrugated Box Plant with
Corrugators

Queretaro MX Container

WestRock
Corrugated Box Plant with
Corrugators

Regina Container

WestRock
Corrugated Box Plant with
Corrugators

Corona Container

WestRock
Corrugated Box Plant with
Corrugators

Denver Container

WestRock
Corrugated Box Plant with
Corrugators

Winston-Salem Container

WestRock
Corrugated Box Plant with
Corrugators

Wakefield Container

WestRock
Corrugated Box Plant with
Corrugators

Bradenton Container

WestRock
Corrugated Box Plant with
Corrugators

Galesburg Container

WestRock
Corrugated Box Plant with
Corrugators

Glendale Container

WestRock
Corrugated Box Plant with
Corrugators

North Tonawanda Container

WestRock
Corrugated Box Plant with
Corrugators

El Paso East Container

WestRock
Corrugated Box Plant with
Corrugators

Montgomery Container

WestRock
Corrugated Box Plant with
Corrugators

Mishawaka Container

WestRock
Corrugated Box Plant with
Corrugators

Chicago Manufacturing

WestRock
Corrugated Sheet Feeder Plants
Athens Sheet Feeder

Domtar
Fine Paper Converting Plants
Owensboro Converting &
Distribution

Domtar
Fine Paper Converting Plants
Washington Court House
Converting & Distribution



74th Annual Safety & Health Conference

No OSHA Recordable Award

Domtar Fine Paper Converting Plants Tatum Converting and Distribution	WestRock Folding Cartons Plants Shimada, Japan	WestRock Other Paper Converting Croydon, PA
Mohawk Fine Paper Converting Plants Specialty Converting Center	WestRock Other Paper Converting Hebron Pre-Print	WestRock Other Paper Converting Tucker Engineering RTS
Domtar Fine Paper Converting Plants Addison Converting	WestRock Other Paper Converting Jacksonville Pre-Print	WestRock Other Paper Converting Hartwell RTS
Domtar Fine Paper Converting Plants DuBois Converting & Distribution	WestRock Other Paper Converting Atlanta Container Pre-Print	WestRock Other Paper Converting Mendoza RTS
Domtar Fine Paper Converting Plants	WestRock Other Paper Converting St. Louis Food Service Packaging	WestRock Other Paper Converting Mexico City RTS
WestRock Folding Cartons Plants Jacksonville	WestRock Other Paper Converting Tulare Food Service Packaging	WestRock Other Paper Converting Santiago RTS
WestRock Folding Cartons Plants Bilabao, Spain	WestRock Other Paper Converting Permanent Group	WestRock Other Paper Converting Scarborough RTS
WestRock Folding Cartons Plants Aardex - Switzerland	WestRock Other Paper Converting Toronto Assembly	WestRock Other Paper Converting Stockton RTS



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No OSHA Recordable Award

WestRock Other Paper Converting Smyrna GA Machinery SES	WestRock Recycle Collection Center Cleveland Recycle	WestRock Recycle Collection Center Tampa Recycle
WestRock Other Paper Converting Valinhos Ink Plant	WestRock Recycle Collection Center Huntsville Recycle	WestRock Recycle Collection Center Nashville Recycle
WestRock Other Paper Converting WestRock Ernea BY Venlo	WestRock Recycle Collection Center Indianapolis Recycle	WestRock Recycle Collection Center Sacramento East Recycle
Expera Specialty Solutions Small Paper Mill Nicolet Mill	WestRock Recycle Collection Center WestRock Trading	WestRock Recycle Collection Center Bakersfield Recycle
Mohawk Small Paper Mill Cohoes Paper Mill	WestRock Recycle Collection Center Division Staff Recycle	WestRock Recycle Collection Center Jacksonville Recycle
WestRock Pulp & Paper Mills WestRock GmbH (Vienna) - Sales (Administrative)	WestRock Recycle Collection Center Waste Services	WestRock Recycle Collection Center Lawrenceville Recycle
WestRock Pulp & Paper Mills Vapi Mill	WestRock Recycle Collection Center Anchorage Recycle	Mohawk Specialty Operations North East Envelope Converting Center
WestRock Recycle Collection Center Atlanta Recycle	WestRock Recycle Collection Center Louisville Recycle	WestRock Specialty Operations Mississauga, ON PrePress



74th Annual Safety & Health Conference

No OSHA Recordable Award

WestRock
Specialty Operations
Richmond, BC PrePress

WestRock
Specialty Operations
Orlando Packaging Systems

WestRock
Specialty Operations
Retail Solutions Sales and Design

WestRock
Specialty Operations
Toledo, OH

WestRock
Woodlands Large
Forest Resources

WestRock
Woodlands Large
Tres Barras Forestry

WestRock
Woodlands Small
Rooster Bridge Chip Mill

WestRock
Woodlands Small
Saltwell Chip Mill

Best One Year Safety Record

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100% Recycle Mill: *Graphic Packaging International, Santa Clara*

Corrugated Box Plants without Corrugators:
WestRock, Springfield, MA Sheet Plant

Corrugates Box Plants with Corrugators:
WestRock, Mishawaka Container

Fine Paper Converting Plants: *Domtar, DuBois Converting & Distribution*

Folding Cartons Plants: *WestRock, Jacksonville*

Other Paper Converting: *WestRock, Tulare Food Service Packaging*

Paper Mill Medium: *Domtar, Windsor, QC*

Paper Mill Small: *Expera Specialty Solutions, Nicolet Mill*

Pulp & Paper Mills: *WestRock, Vapi Mill*

Recycle Collection Center: *WestRock, WestRock Trading*

Specialty Operations: *WestRock, Toledo, OH*

Woodlands Large: *WestRock, Tres Barras Forestry*

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Most Improved Award

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100% Recycle Mill: New-Indy, Hartford City

Corrugated Box Plants without Corrugators:
WestRock, Rochester Sheet Plant

Corrugates Box Plants with Corrugators:
WestRock, Portland Container

Fine Paper Converting Plants: Domtar, Addison
Converting

Folding Cartons Plants: WestRock, Montreal
Folding

Other Paper Converting: WestRock, WestRock
Knox

Paper Mill Medium: Graphic Packaging
International, West Monroe

Paper Mill Small: Dunn Paper, Port Huron

Pulp & Paper Mills: WestRock, Hodge Mill

Recycle Collection Center: WestRock, Indianapolis
Recycle

Specialty Operations: WestRock, Mississauga, on
Prepress

Award of Safety Excellence

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MOHAWK

Cohoes Paper Mill – Combined Paper Mills



WestRock

Monterrey Mix Container – Converting Operations



**GREEN BAY
PACKAGING**

Pinecrest, AR – Woodlands and Solid Wood



74th Annual Safety & Health Conference

Sustainability Award

Sonoco 100% Recycle Mills Richmond	WestRock Corrugated Box Plant without Corrugators Highland Sheet Plant	WestRock Corrugated Box Plants with Corrugators El Paso East Container
Green Bay Coated Products Winchester, VA	WestRock Corrugated Box Plant without Corrugators Kennesaw Sheet Plant	WestRock Corrugated Box Plants with Corrugators Galesburg Container
WestRock Corrugated Box Plant without Corrugators Atlanta East Sheet Plant	WestRock Corrugated Box Plant without Corrugators Neenah Sheet Plant	WestRock Corrugated Box Plants with Corrugators Glendale Container
WestRock Corrugated Box Plant without Corrugators Des Moines Sheet Plant	WestRock Corrugated Box Plants with Corrugators Bradenton Container	WestRock Corrugated Box Plants with Corrugators Mexicali Mx Container
WestRock Corrugated Box Plant without Corrugators Fort Smith Sheet Plant	WestRock Corrugated Box Plants with Corrugators Chicago Manufacturing	WestRock Corrugated Box Plants with Corrugators Montgomery Container
WestRock Corrugated Box Plant without Corrugators Callatin Fullfillment	WestRock Corrugated Box Plants with Corrugators Corona Container	WestRock Corrugated Box Plants with Corrugators North Tonawanda Container
WestRock Corrugated Box Plant without Corrugators Graphcorr	WestRock Corrugated Box Plants with Corrugators Devens Container	WestRock Corrugated Box Plants with Corrugators Regina Container



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Sustainability Award

WestRock
Corrugated Box Plants with
Corrugators
Wakefield Container

WestRock
Corrugated Box Plants with
Corrugators
Winston-Salem Container

WestRock
Corrugated Sheet Feeder
Plants
Athens Sheet Feeder

Mohawk
Fine Paper Converting Plants
Specialty Converting Center

Domtar
Fine Paper Converting Plants
Tatum Converting And
Distribution

Domtar
Fine Paper Converting Plants
Brownsville Converting &
Distribution

WestRock
Other Paper Converting
Atlanta Container Pre-Print

WestRock
Other Paper Converting
Hartwell Rts

WestRock
Other Paper Converting
Hekron Pre-Print

WestRock
Other Paper Converting
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Other Paper Converting
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Other Paper Converting
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Other Paper Converting
Santiago Rts

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St Louis Food Service
Packaging

WestRock
Other Paper Converting
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WestRock
Other Paper Converting
Toronto Assembly

WestRock
Other Paper Converting
Tucker Engineering Rts

WestRock
Recycle Collection Center
Anchorage Recycle

WestRock
Recycle Collection Center
Atlanta Recycle

WestRock
Recycle Collection Center
Bakersfield Recycle

WestRock
Recycle Collection Center
Cleveland Recycle



74th Annual Safety & Health Conference

Sustainability Award

WestRock
Recycle Collection Center
Division Staff Recycle

WestRock
Recycle Collection Center
Louisville Recycle

WestRock
Specialty Operations
Louisville Recycle

WestRock
Recycle Collection Center
Huntsville Recycle

WestRock
Recycle Collection Center
Sacramento East Recycle

WestRock
Specialty Operations
Sacramento East Recycle

WestRock
Recycle Collection Center
Jacksonville Recycle

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Tampa Recycle

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WestRock
Recycle Collection Center
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WestRock
Woodlands
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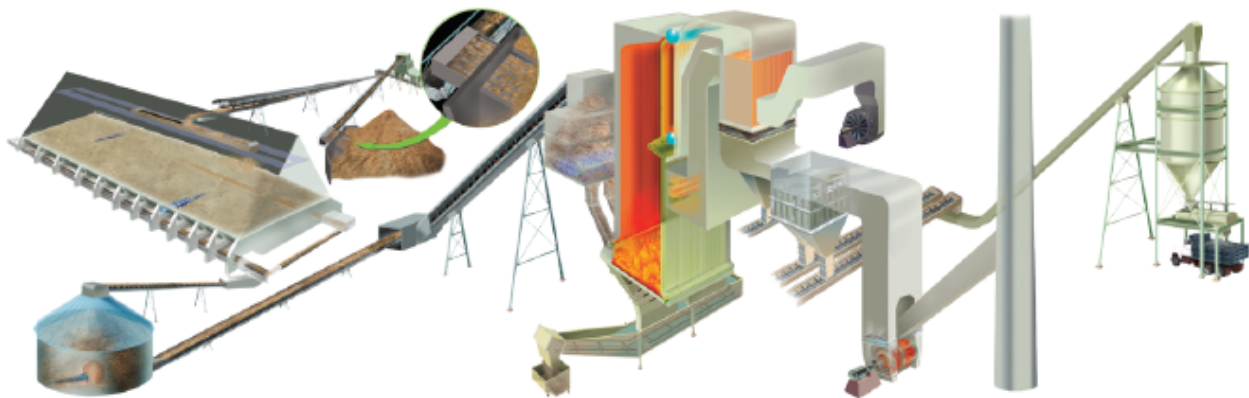


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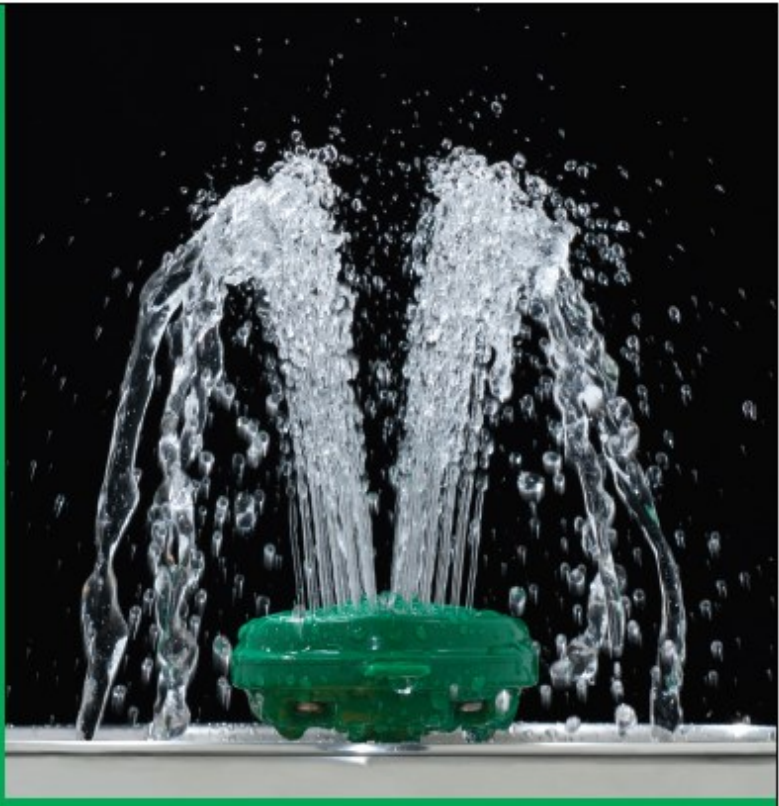
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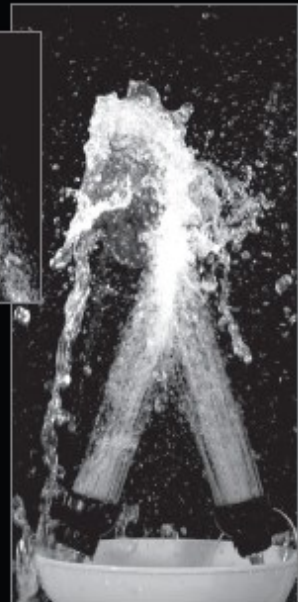
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Boosting Loading Dock Safety and Productivity

By Walt Swietlik and Tim Kubly: Rite-Hite Corporation

The loading dock is a critical component of the Material Transfer Zone (MTZ), which reaches from the drive approach into the shipping, receiving, and staging areas. There are a broad range of concerns in the MTZ – some of which include: dock positioning and design, trailer design, load configuration, dock equipment systems, and the interaction between material handling vehicles and pedestrians, and product shipments.

A smooth-flowing MTZ lets companies avoid delays, minimize accidents, prevent product damage, meet schedules—and ultimately, satisfy your shipping/receiving requirements. This ideal MTZ can only exist, however, if the loading dock is properly designed and maintained. With effective loading dock processes, companies can realize significant gains in productivity, energy efficiency, and safety, while cutting costs.

Here are 10 tips for improving productivity and safety on the loading dock.

1. **Conduct a safety audit.** Companies often don't think about dock safety until an accident occurs. But thinking ahead pays off. Serious, nonfatal workplace injuries amount to nearly \$60 billion in direct U.S. workers' compensation costs annually¹. A safety audit is an excellent way to examine operations and make necessary adjustments to help ensure employee safety.
2. **Keep equipment in line with operational changes.** In many cases, loading docks purchased 15-20 years ago may not be equipped to handle today's larger loads and frequencies. The application for your loading docks may have changed; for example, docks previously used for lighter loads (sheet/flat stock, etc.) may now be used to unload/load heavier shipments (roll stock, double pallets, etc.) and your frequencies may have increased due to adding a second or third shift. If your levelers are not designed to handle the gross vehicle weight of the loads, the larger Powered Industrial Trucks (PITs), and/or increased activity, this could create an unsafe environment due to potential leveler damage. To help avoid this it's important to make sure you are operating levelers with the proper capacity for the job.
3. **Use dock equipment controls to help curb human error.** If your loading dock is equipped with dock levelers, overhead doors, and vehicle restraints, consider using interlocks. By implementing a safe sequence of operation it will help ensure your employees are utilizing your investments safely, and can reduce the opportunity for injuries and equipment or product damage at busy loading docks.
4. **Inspect, repair, or replace dock seals and shelters.** Inefficient dock seals cost businesses thousands of dollars each year in energy costs. They can also cause employee discomfort in extreme weather conditions. To ensure air does not infiltrate the building regularly check the vertical and bottom seals on overhead doors, as well as the seals along the perimeter of the dock leveler to make sure they're not leaking. If your operation uses trailers with swing-out doors the open space created by the doors' hinge gaps typically equates to 2.5 square feet of unsealed space. It's important to use a shelter that seals off these gaps. As more companies in the Pulp, Paper & Packaging industry are required to meet inspections and certifications to minimize "white light" at loading docks, the importance of seal and shelter inspections and replacements is emphasized.

¹ 2017 Liberty Mutual Workplace Safety Index

Continued on page 27

5. **Keep loading docks dry.** Water on the loading dock creates a hazardous situation for employees & PITs as the dock leveler plates can become slippery. Water can also ruin your product – in this case the cost to your company is time and money. Water damage most commonly occurs when rain or melting snow flows onto the trailer roof and then onto your dock leveler. A rain diversion header seals is a cost-effective way to prevent water infiltration. These seals keep the building owner from having to re-grade the drive approach or rebuild the dock face in order to keep employees and products safe and dry.
6. **Make maintenance an important part of your process.** Put your loading dock's mechanical components—dock levelers, vehicle restraints, and overhead doors—on a regular maintenance schedule. Be sure to clean, lubricate, and adjust major moving parts. This type of regular maintenance program helps to increase safety, extend product life, enhance reliability, and increase productivity by reducing downtime.
7. **Check dock doors.** Maintaining, repairing, and replacing dock doors can be costly—but it's necessary. Loading dock doors that are not working properly creates a major safety concern. Manual doors that are difficult to lift open or pull closed could lead to a strained back, shoulders, or neck. If you have powered doors, make sure to inspect the cables and tracks for proper and smooth operation.
8. **Examine loading dock accessories.** Lights, dock bumpers, trailer stands, and other aftermarket parts and accessories are important components of loading dock operations. But, bulbs burn out, dock bumpers may wear out or fall off, and other items can also suffer damage. Take an inventory of this type of equipment once or twice a year to ensure everything is still in place and working properly.
9. **Upgrade dock equipment.** Many dock leveler manufacturers offer programs enabling clients to upgrade from mechanical operation to push-button operation. Some manufacturers provide the opportunity to optimize vehicle restraints in order to maintain current safety standards without replacing the entire unit. You don't have to invest in completely new dock equipment to realize increased safety and operational efficiencies. It helps, however, to get a realistic estimate of the existing equipment's life expectancy before considering any upgrades.
10. **Evaluate security.** Examine points of entry to see how easy it is to gain access to your facility via the loading dock. To increase security, connect overhead doors and vehicle restraints to your facility's security system—an alarm will sound if a door is breached, or a trailer is released without authorization.

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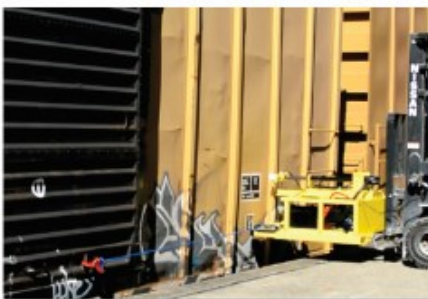


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OSHA QuickTakes

July 18, 2017

Volume 16, Issue 14

OSHA announces \$10.5M funding opportunity for Susan Harwood Training grants

OSHA today announced the availability of \$10.5 million in [Susan Harwood Training Grants](#) to fund training and education for workers and employers to help them identify and prevent workplace safety and health hazards. The grants are available for nonprofit organizations including community and faith-based organizations, employer associations, labor unions, joint labor/management associations, Indian tribes, and colleges and universities. Recipients will create in-person, hands-on training and educational programs and develop materials for workers and employers in small businesses; industries with high injury, illness and fatality rates; and vulnerable workers who are underserved, have limited English proficiency or are temporary workers. Harwood applications must be submitted online no later than 11:59 p.m. EDT on Monday, Aug. 28. For more information, read the [news release](#) or visit [Grants.gov](#).

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 [Erie Institute of Technology](#) renewed a [five-year agreement](#) to help reduce the exposure of young workers to occupational safety and health hazards.
- The [Associated General Contractors – San Antonio Chapter](#) renewed a [two-year agreement](#) to provide members and others with guidance and training resources that will help them protect the health and safety of workers, particularly by reducing and preventing exposure to falls, electrocution, struck-by, caught-in or between, and addressing general industry and construction issues.

Form for electronically submitting injury, illness data available Aug. 1

On Aug. 1, OSHA will launch a [web-based form](#) that will allow employers to electronically submit required injury and illness data from their completed 2016 OSHA Form 300A. The webpage will offer three options for submitting data, and includes information on reporting requirements, a list of frequently asked questions, and a link to request assistance with completing the form.

OSHA published a [notice of proposed rulemaking](#) last month to extend the deadline for electronically submitting the data to Dec. 1, 2017. The proposed extension gives those affected sufficient time to familiarize themselves with the electronic reporting system, and provides the new administration an opportunity to review the new electronic reporting requirements prior to their implementation. For more information, read the [news release](#).

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Employee Engagement with a Personal Touch

Submitted by: Randy Adams

How many of you reading this article can honestly say that you take the time to have personal one on one safety related conversations with the employees? Is it a conversation or a comment in passing? In that conversation do you ever ask how the family is doing? The majority of employees are really encouraged by those personal conversations; especially when their family members are included.

The reason for their encouragement is because you have included something that is very valuable to them on a very "personal" level. So many times we spend the majority of our time looking for the "bad" stuff or we are so busy we are distracted by those things that do not show a personal and sincere caring toward the welfare of the employee or their family. All of us want to be recognized as an important part of the business! Don't you?

All we have to do is take the time to express a sincere appreciation for the good things going on and maintain a positive outlook (even when the negative is evident – build up not tear down). It doesn't have to be a pie in the sky type moment but letting someone know how much they are appreciated will go a long way when implementing safety programs. Sometimes I think back to the opportunities I missed in my early management career by not showing that sincere caring approach when engaging the employees. Things would have been much better if I had taken the time.

I truly believe that there is not a process or person out there that cannot improve and do things better than the day before. Health & Safety are key elements for a successful business – keeping the employees well and safe should be any business' ultimate goal but it takes an honest and sincere approach to sustain. When you have a healthy workforce...the morale is always better which positively affects the Safety, Quality and Production of any facility...therefore positivity affects the bottom line – which is why we are in business.

Finally, remember that talking with your employees does not cost a lot of money but illnesses & injuries do for all involved!



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This year's winner is Jim Porter, President, Business Development and Latin America, WestRock. He is president of Business Development and Latin America. In this role, he oversees WestRock's ongoing development of new business opportunities, and management responsibility for the company's operations in Latin America. Previously he held the role of president, Paper Solutions, and president, Corrugated Packaging, at WestRock. He joined RockTenn in 2008 with the acquisition of Southern Container Corp., where he was president and chief operating officer.

Prior to RockTenn, Jim also served as president of Solvay Paperboard— a subsidiary containerboard mill of Southern Container. Jim joined Solvay in 1993 as vice president with responsibility for building the team and operating the facility which grew into a state-of-the-art, 800,000 ton recycled containerboard mill. WestRock acquired Southern Container and Solvay Paperboard in 2008.

Prior to 1993, Jim spent 19 years with Menasha Corporation, beginning in the company's Timberland Division in 1974 and ultimately becoming general manager of Menasha's Paperboard Division in Otsego, MI.

Jim is the past chairman of the Fibre Box Association; past chairman of the Containerboard Sector of the American Forest & Paper Association; previously on the Board of Directors for Corrugated Packaging Alliance, International Corrugated Case Association and the World Containerboard Organization.

He has three children, seven grandchildren and lives in Atlanta with his wife, Pam.



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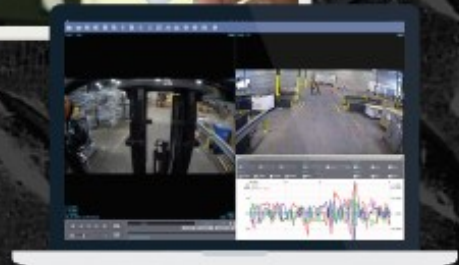


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Why Did OSHA Propose To Remove The Principle Of “Unexpected Energization” From Its Lockout/Tagout Standard?

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

The general principle established by the *GMC Delco* decisions¹ of 1995 and 1996 is that the Lockout/Tagout Standard does not apply to a serving or maintenance activity where the only risk of injury would be due to a machine start-up while the employee is in the danger zone, and the machine is reliably designed to provide the employee with sufficient advance notice of any start-up to safely evacuate the area. In our practice, we have not advocated reliance on that type of safety system. However, we suggested that a more appropriate reading of those cases was that when reliable safety control circuits effectively protect the affected workers from hazardous energy sources, there is no potential for unexpected energization or start up or release of stored energy, and the LOTO Standard should not apply.

Over time, OSHA seemed to grudgingly accept this principle. In the OSHA LOTO Directive², the agency stated:

[T]o the extent that they eliminate or prevent employee exposure to hazardous energy, the use of machine guarding methods (e.g., barrier guards, enclosure guards) may be used as alternatives to LOTO during servicing and/or maintenance activities.

In a 2005 letter of interpretation regarding the performance of die changes,³ OSHA stated:

Question 1: Does the lockout/tagout (LOTO) standard require that machines, including hydraulic presses, be de-energized and locked out except for the portion of die-setting that involves testing and positioning?

Reply: Yes, to the extent that employees are otherwise exposed to hazardous energy [emphasis added].

....

The LOTO standard is intended to work in conjunction with the machine guarding standards to provide optimum employee protection. Compliance with the Subpart O requirements is essential during power press component test/position activities. Moreover, in some cases, the implementation of effective machine guarding techniques may eliminate worker exposure to hazardous energy, providing a feasible and acceptable alternative to LOTO.

¹Secretary of Labor v. General Motors Corporation, Delco Chassis Division, OSHRC Docket No. 91-2973 (April 26, 1995), affirmed *Reich v. General Motors Corporation*, 89 F.3d 313 (6th Cir. 1996).

²OSHA Directive Number: CPL 02-00-147, The Control of Hazardous Energy — Enforcement Policy and Inspection Procedures, Effective Date: 2/11/08.

³April 22, 2005 Letter of Interpretation to William Kincaid found at https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=INTERPRETATIONS&p_id=25081

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However, when machine guarding methods do not eliminate exposure to hazardous energy, LOTO is required to prevent die-setter employees from being seriously injured when performing die-set servicing activities.

However, the agency had been vague and inconsistent in implementing this principle.

In October 2016, after 20 years of operating under the *GMC Delco* cases, OSHA issued a proposal⁴ to remove the principle of “unexpected energization” from the General Industry LOTO Standard. We viewed this as an inappropriate effort to disregard technological advances and return to a universal energy isolation standard, subject to the explicit exemptions for minor servicing activities and testing and positioning activities. Ignoring the potentially enormous loss of productivity that would result from this change, OSHA apparently took this step as a matter of administrative convenience. It described the proposed change (in the preamble) as a way of providing certainty, however painful, to the regulated community in a way that ignored the safe and practical manner in which the principle of unexpected energization has been applied by the regulated community and most OSHA compliance personnel:⁵

[T]he *GMC Delco* decisions, in essence, require a case-by-case assessment of various warning schemes to determine the applicability of the standard. To enforce the standard consistent with those decisions, OSHA has provided its compliance officers with 11 different factors to evaluate to determine whether particular warning devices are adequate and reliable enough to allow all employees to escape all types of hazardous energy in all circumstances that may occur (see CPL 02-00-147 at 3-5 to 3-6). This creates a degree of uncertainty about the applicability of the standard for the regulated community that OSHA did not intend.

OSHA seemingly attempted to paint a picture of employees scurrying out of machines before they start up. In reality, employers operating tens of thousands of pieces of equipment (e.g., die cutters, folder/glueers and other paper converting machines, and injection molding machines) at tens of thousands of facilities across the country currently rely on the protections provided by reliable control circuitry as a cost-effective alternative to the application of LOTO. The extensive two-year process described in the Grant of a Permanent Variance to Nucor Steel Connecticut Incorporated, 81 FR 20680 (April 8, 2016), demonstrates how unworkable the situation would become if OSHA were to revise the LOTO Standard as proposed and then assert that the employers had a choice between either locking out or obtaining a variance before they could rely on the use of control circuitry. That could very well be the outcome of a rule that requires the use of energy isolating devices to implement LOTO and states that control circuit devices are not energy isolating devices, leading to a range of adverse economic consequences for regulated industry.

Again, one wonders why the agency chose this time to eliminate the principle of “unexpected energization” from the standard. Possibly, it was the unreviewed decision of a Review Commission judge in *ALRO Steel Corporation* in September of 2015. ALRO involved a challenge to a LOTO citation issued to an employer that relied on a blade changing procedure for its band saws that required locking control circuit devices rather than energy isolating devices when changing the cutting blades on two band saws.

⁴Standards Improvement Project-Phase IV; Proposed Rule; OSHA Docket No. OSHA-2012-0007 (81 Fed. Reg. 68504, October 4, 2016).

⁵81 FR 68507, col. 1.

Continued on page 48

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OSHA's presentation of the case was based on the risk that control circuit devices are subject to failure resulting in unexpected energization and, for that reason, energy isolation is required. OSHA did not contend that the band saws presented a hazard due to stored energy or that the band saws were subject to accidental or inadvertent startup by the operator or someone other than the operator.

The issue presented by the case was whether OSHA established that, despite the startup procedures developed by ALRO, and the control circuitry upon which it relied, employees performing blade changes were exposed to the hazard of "unexpected energization," through equipment malfunction resulting in inadvertent startup. OSHA relied on its expert's testimony consisting primarily of generic statements as to the types of potential equipment failures and their consequences. OSHA's expert did not inspect the machines or review the schematics for the machines. As the judge stated, OSHA's position "is divorced from the particulars of the band saws at issue in this case." In contrast, the employer's expert reviewed the schematics and control circuit devices and presented testimony as to the likelihood of component failures and their consequences.

The judge found the testimony of the employer's expert more persuasive and made the following findings of facts:

Based on the electrical design of the machines—

- (1) Unexpected energization would not occur, even if the control circuit components failed.
- (2) If there was an equipment malfunction regarding the electrical contacts, the contacts would fail in the open position and, therefore, the failure would not result in the saw unexpectedly energizing.
- (3) In the unlikely event that the electrical contacts were to fail in the closed position, the band saws would continue to run, providing obvious advance notice to the operator not to begin a blade change.
- (4) For the saws to start [once the blade changing procedure is implemented], the operator is required to engage in a multi-step process, which includes reaching into his pocket for a key and unlocking the start button.

The judge ultimately concluded that "the preponderance of the evidence demonstrates that neither of Respondent's saws was subject to inadvertent startup and unexpected energization." That case, which has no official precedential effect, but reflects the logical extension of the *GMC Delco* decisions, appears to be the unstated reason for OSHA's rush to amend the LOTO Standard in October of 2016. We now have a golden opportunity to properly update the outdated OSHA Lockout/tagout Standard in a way that provides for employee safety in a cost-effective manner that takes advantage of advances in technology without the use of the cumbersome OSHA variance process.

This article represents the personal opinion of the author and does not necessarily represent the views of Keller and Heckman LLP or any of its clients. This article is provided for purposes of general information. It does not constitute and may not be relied upon as legal advice.



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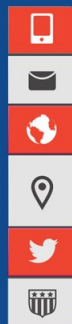
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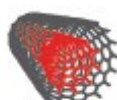
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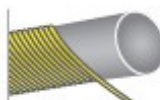
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PPSA Committees

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 - paul.bierley@domtar.com

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

Members: Paul Bierley, Domtar (Chair), Paul Bucek, Green Bay Packaging, 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:

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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, 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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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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