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A Letter From Our Chair

Steve Gearheart

Safety Director, New-Indy Containerboard



On behalf of the entire PPSA Board of Directors, I'd like to say thank you to our members, corporate and vendor partners for your continued efforts and support of the PPSA. The PPSA Board of Directors and the association's committees have been working diligently to create valuable programming and publish articles to enhance and drive safety development at all levels of the pulp and paper industry.

In particular there are a few of the projects that rise to the level of special recognition :

- The annual conference was held at the San Antonio Marriott Riverwalk, San Antonio, TX from June 23 to 26, 2019, was the highest attendance in recent history with over 300 attendees. The conference featured an exceptional program with focuses on safety leadership, human organizational performance, and emergency preparedness. We also featured a sold out exhibit floor for the 3rd year in a row. [If you've missed us this year](#), please consider on attending in 2020 to learn, network, develop your skills, and processes in your facilities.
- The Education Committee continues to work on developing webinars, including the most recent Emergency Preparedness webinar. Additionally, the Education Committee and Contractor Committees are working to plan a contractor focused workshop in the fall of this year. The committee is excited to take feedback from our conference survey and prepare new educational experiences for our members.
- Several members from our board of directors participated in a panel on the association's Call to Action publication. This publication is available on www.ppsa.org, and the Pulp and Paper Safety Association Board of Directors invites you to read and discuss its Call to Action article available online [here](#).

PPSA strives to improve the Safety and Health processes across our industry. If at any time you have a suggestion, need assistance, or information on an issue or have a success you would like to share, please do not hesitate to contact us.

Stay Safe!
Best Regards,
Steve Gearheart, PPSA General Chairman



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Securing Non-Driven Dryer Cans During Inspections**Bob Ross****Safety Director Packaging Corporation of America**

Inspecting the internals of dryer cans is an intricate part of a good preventative maintenance program and occurs on a routine basis. On new paper machines, most dryer cans are connected to drives that, when locked out, will not rotate. However, some older paper machines can have non-driven dryers that could potentially move when external forces are applied, especially if there is no felt on the cans.



In the past, we have secured these non-driven cans with various devices such as chain falls, slings and clamps. However, while performing this task we sometimes put individuals at risk of falling or possible injury if the dryer cans rotate. At the PCA International Falls Mill, the Production and Maintenance Departments developed a method that can be applied to secure non-driven dryer cans. The device is made from beam clamps, all thread and turnbuckles.

Since not all dryers are spaced the same distance apart, make sure you have enough room to reach adjacent dryer cans. Also attached is a picture of a device they developed to assist in turning the cans that mounts to the outer shell. A portable electric hoist is used to move the dryers into the desired position for entry, work, or inspection of the dryer cans.



As stated earlier, you will need to customize the devices to fit each mill's dryers cans. Thanks for the help from the International Falls Management Team for sharing this method. I hope this helps keep everyone a little safer during these confined space entry inspections.



Join PPSA's Contractor Committee!

In the interest of PPSA's mission, ***Bringing the Industry Home Safe***, we are proud to announce the formation of the Contractor Committee. For their obvious partnership in the success of our industry, PPSA would like to offer this new opportunity for participation, education, and membership opportunities to our industry contractors.

The contractor committee will work unilaterally with other committees (Education, Membership, Communication, and Awards) to fully develop a valuable membership experience for industry contractors.



Join this committee to explore and support opportunities to improve contractor focused safety within our industry through the following avenues:

- Training and Education
- Webinars and Workshops
- Annual Health & Safety Conference
- Benchmarking & Innovation
- Professional Growth and Networking with Industry Peers
- Awards & Recognition

Committee Chair: Matthew Kanneberg, WestRock



To join this committee please contact PPSA at info@ppsa.org

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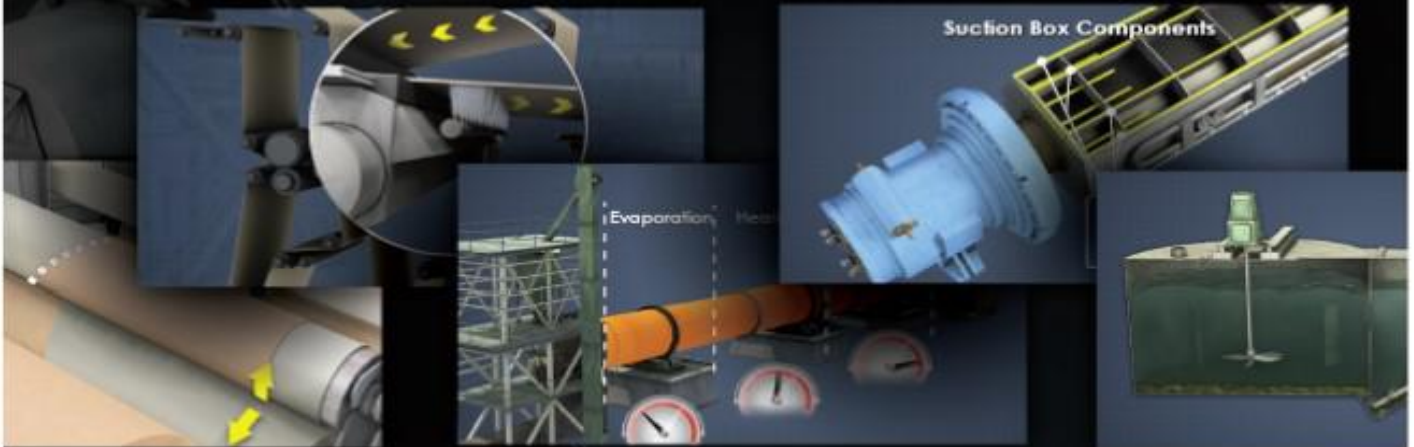
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Everyday Situations We're All Aware of the; But the Potential Continues!.....

The focus of this short article is get you thinking about ways to combat the ever ongoing situations associated with heat stress exposure.

Summer Time Heat. We've heard it a thousand times as we move into the summer season. Plenty of fluids, eat right, get proper rest and on and on and on. Every year we review the same things, but do our employees *really* manage summer heat exposure correctly? Given the life style that many have and the varieties of diets (Red Bull and Potato Chips); twelve hour shifts, it's truly a wonder that the actual experience of heat stress exposures are not more prevalent.

Many workplaces implement summer time programs to prevent potential heat exposures. Training, fluids available, frozen items to eat, work rest periods, cooling systems, etc. and it's very successful in preventing incidents as you'd expect. As all of us continue to work on prevention here are some considerations:

- Do you keep the program alive and meaningful? Is the training fresh and relevant?
 - Having different or guest speakers to talk about it can add value
- Do you have a process to check on your employees during their shift?
- Do employees understand the importance of taking care of themselves?
 - Having a paramedic, nurse, doctor, etc. speak to the employees can emphasis the importance of heat stress prevention
- Continual enforcement of heat stress prevention
 - Daily shift huddle topic review
 - Observations and one on one conversations

At the end of summer, we are all striving to have no heat stress events. It's an ongoing, continuous effort to "keep our people safe". But when you have a good plan, work the plan and everyone is working on the same plan; zero heat stress incidents is completely attainable!



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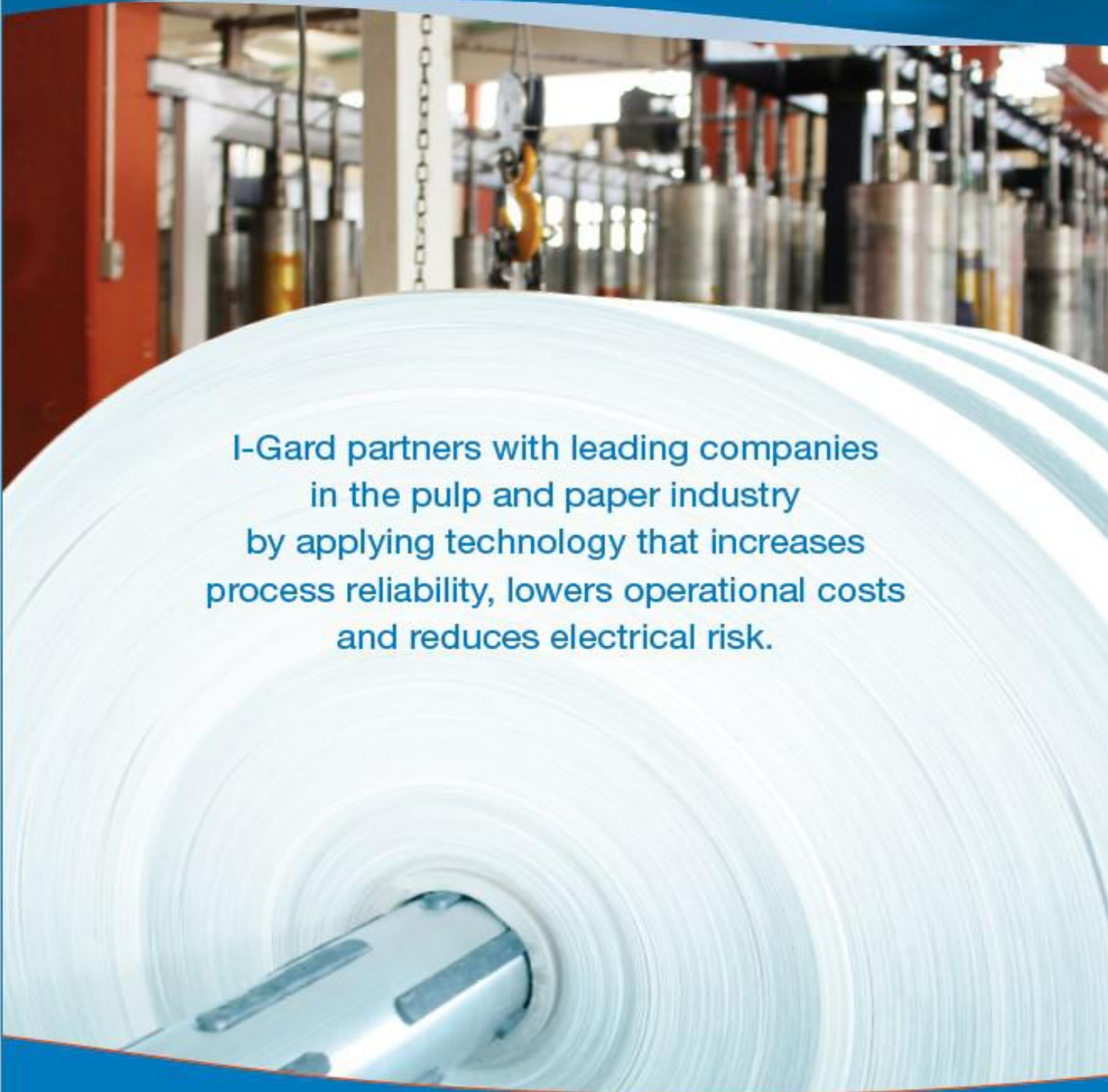
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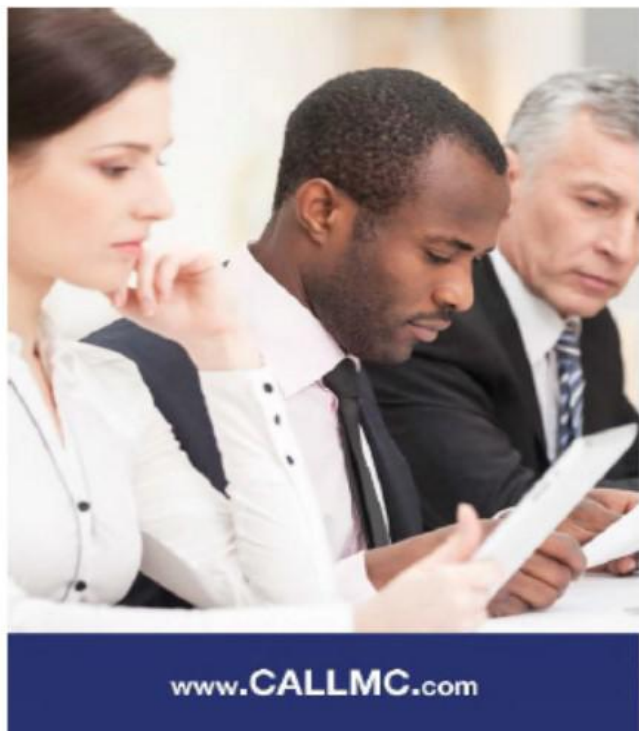
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Member Spotlight: Amber Howard, Clearwater Paper Corporation



Amber Howard has been an employee of Clearwater Paper Corporation for 12 years. Following in her family's footsteps, she began working as an hourly employee on the Paperboard Machines in Lewiston, Idaho. Amber applied for a safety coordinator position 7 years ago and moved into the safety department and while there, decided to pursue a career in Occupational Safety and Health Management. In 2013, she was awarded the Corporate Rising Star in Safety award. While working as an hourly safety coordinator and later as a safety technician, she completed her Bachelor of Science Degree in Occupational Health and Safety Management. After receiving her Safety Professional Certification, she was promoted to a Safety Manager position and is gaining experience in the tissue products area. Amber is on task to complete her Master of Science in Occupational Safety and Health with a concentration in Environmental Management in 2020. As evidenced by her commitment to her education, Amber has become a firm believer that gaining knowledge is a process, one that will be never-ending. She plans on obtaining a Doctorate in Business

Administration next!

Amber has led many employee engagement work teams to resolve problems and create consistency within practices and policy. She has most recently led the site in Hazardous Energy Control, Overhead Cranes, Ergonomics and Confined Space work. Amber is known for finding ways to not only make the workplace a safer environment, but also for ensuring that there is laughter along the way.

What does Safety Mean to You?

"To me, safety is a team which includes operations, maintenance, management, and safety professionals who work collaboratively to implement regulations, influence positive behavior, recognize hazards and therefore, reduce risks in order to keep everyone free of harm and danger."

What aspect of your role do you enjoy the most?

"I enjoy getting the opportunity to work with others and being able to share the knowledge of safety that I have acquired. I am here to make a difference, and with safety I have the opportunity to prevent serious incidents from happening."

Continued from pg. 29

Get to Know Amber Off-the-Clock

What makes you feel like a kid again?

"I feel like a kid again when I am on the beach, playing in the sand, and building sandcastles with my nieces and nephews. Also, when I am on a four-wheeler simply riding, I feel like a kid again too!"

What are the top 3 things on your bucket list?

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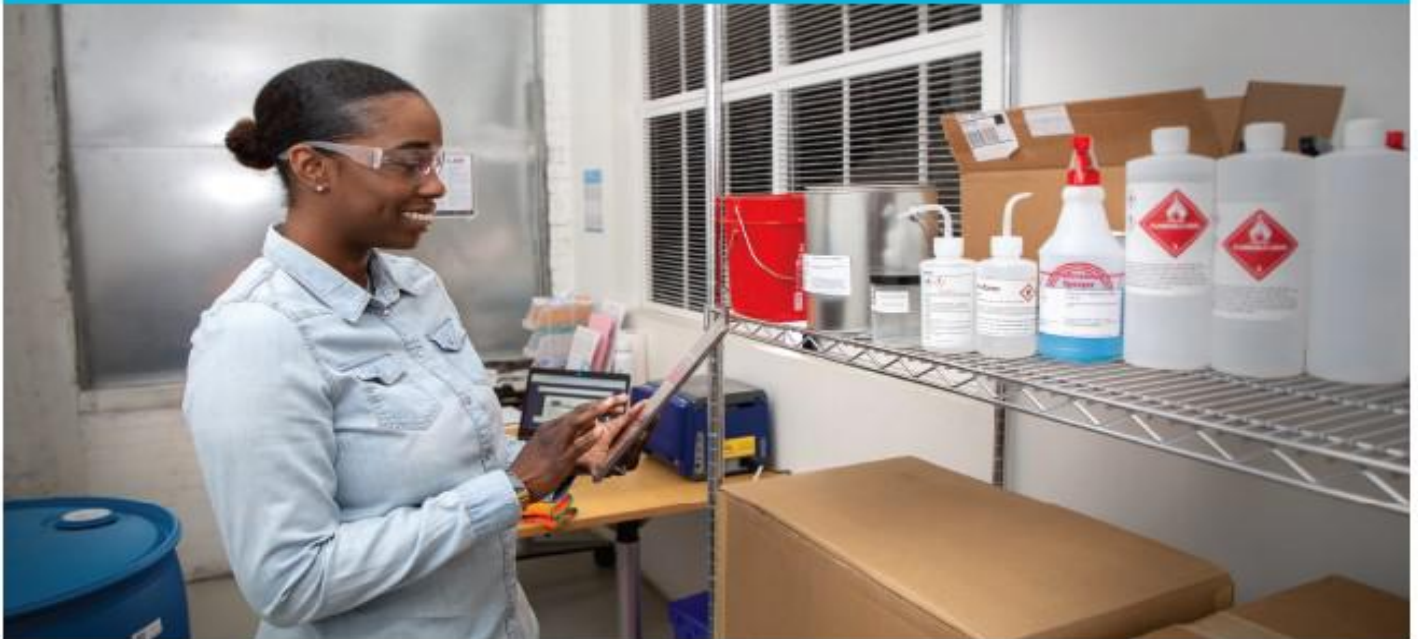
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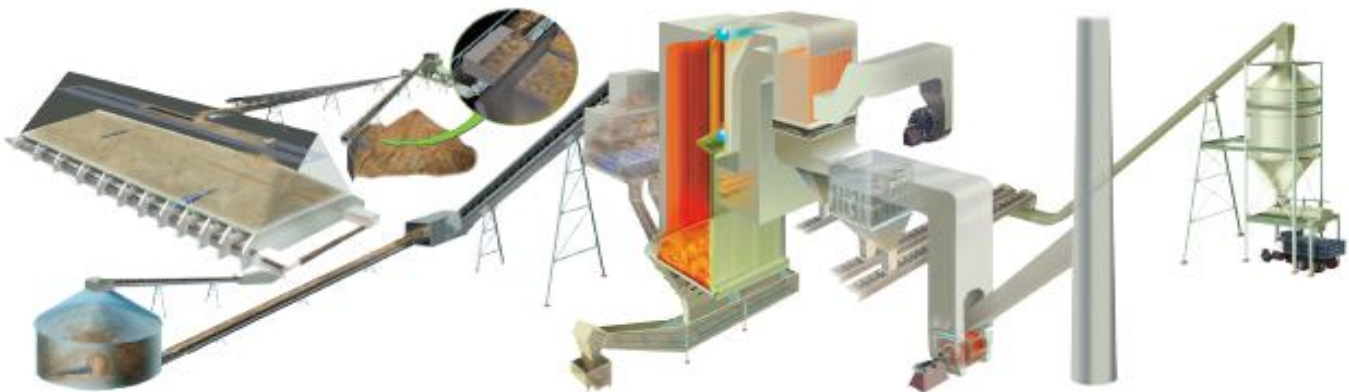
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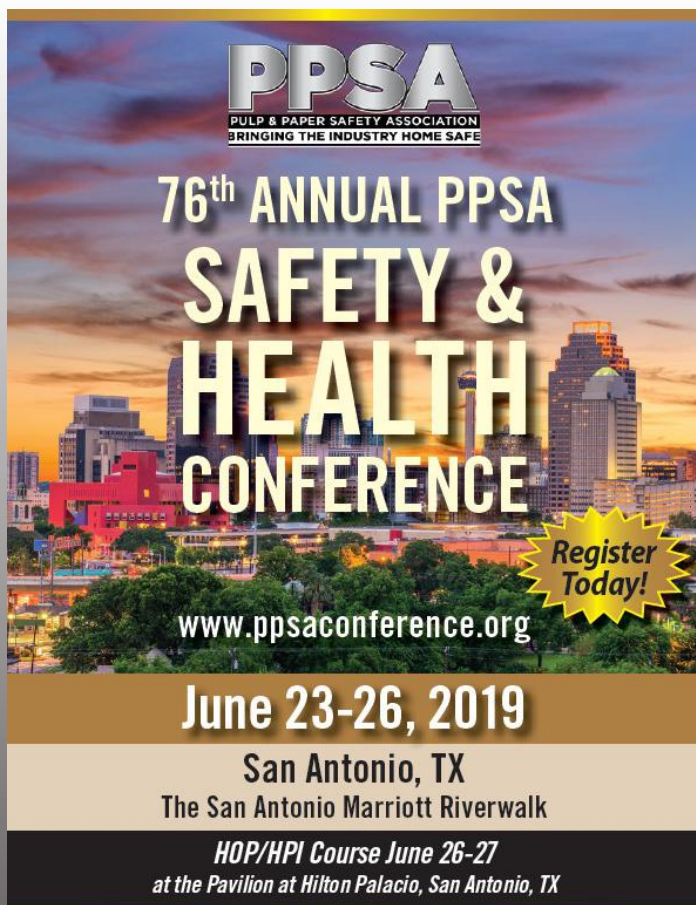
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The poster features a cityscape at sunset with the PPSA logo at the top. The text reads: 'PPSA PULP & PAPER SAFETY ASSOCIATION BRINGING THE INDUSTRY HOME SAFE', '76th ANNUAL PPSA SAFETY & HEALTH CONFERENCE', 'www.ppsaconference.org', 'June 23-26, 2019', 'San Antonio, TX', 'The San Antonio Marriott Riverwalk', 'HOP/HPI Course June 26-27', and 'at the Pavilion at Hilton Palacio, San Antonio, TX'. A yellow starburst graphic says 'Register Today!'.

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PPSA Committees

Below is an update of the current Board members, roles and responsibilities of the PPSA Committees. Everyone on these committees volunteers 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. An asterisk (*) next to a committee member's name designates an association member serving on a committee.

Executive Committee - steve.gearheart@new-indycb.com

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

Members: Steve Gearheart, New-Indy Containerboard (Chair), Paul Bierley, Domtar, Randy Adams, Kruger, George Kolesar, Sonoco, 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 to sustain the effectiveness of the organization.

Conference Committee - randy_adams@ktgusa.com

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

Members: Randy Adams, Kruger (Chair), Paul Bierley, Domtar, Tim Elizondo*, WestRock, Steve Gearheart, New-Indy Containerboard, Matthew Kanneberg, WestRock, Shawn Powell, Brady Corporation, Pete Masias, Green Bay Packaging, Dewayne Bone, Greif, Emma Ragauskas, PPSA Staff, Ashley Westbrook, PPSA Staff

Current Activity: Evaluating and planning 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 developing, tracking, and increasing both company and vendor PPSA membership.

Members: Paul Bierley, Domtar (Chair), Paul Bucek*, Green Bay Packaging, Sally Boven*, Reflective Apparel, Tim Kubly, Rite-Hite Corporation, Emma Ragauskas, PPSA Staff, Ashley Westbrook, PPSA Staff

Current Activity: 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. The committee is also currently working to attract more contractor companies to the association.

Educational Development - larry.warren@domtar.com

The Educational 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, Dick Jackson, International Paper, Brian Bork*, CR Meyer, Jeff Dalto*, Convergence Training, Emma Ragauskas, PPSA Staff, Ashley Westbrook, PPSA Staff

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Current Activity: The committee is working on several initiatives:

- finalizing and publicizing the details for upcoming continuing education opportunities such as course offerings and webinars
- seeking opportunities to leverage the educational capabilities and efforts of PPSA across the industry

Awards and Nominations - pmasias@gbp.com

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

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

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

Communications Committee - joy.ausman@clearwaterpaper.com

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

Members: Joy Ausman (Chair), Clearwater Paper, Steve Gearheart, New-Indy Containerboard, Curtis James*, Austin Industrial, Kyle Breiner*, Domtar, Emma Ragauskas, PPSA Staff, Ashley Westbrook, PPSA Staff

Current Activity: Reviewing the current Quarterly Report (QR) newsletter. They 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.

Contractor Committee - matt.kanneberg@westrock.com

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

Members: Matthew Kanneberg, WestRock (Chair), Dick Jackson, International Paper, Brian Bork*, CRMeyer, Ted Carroll*, Jacobs, Brian Donlon*, VOS Electric, Dean Kuhlman*, Rusty Smith*, Austin Industrial, Cheri Stuart*, Graphic Packaging, Thompson Industrial, Larry Rocco*, Thompson Industrial, Clint Thacker*, C&R Compliance, Joey Norment*, SFC Contract Services, Cameron Pritchett*, National Boiler, Emma Ragauskas, PPSA Staff, Ashley Westbrook, PPSA Staff

Current Activity: Recruiting members for the committee and working to increase programming and representation of contractors within the association.

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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OSHA QuickTakes Volume 18, Issue 12

Hurricane Preparedness and Response

Hurricanes and tropical storms can create a variety of hazards for workers. Preparing for weather-related emergencies plays a vital role in ensuring that employers and workers have the necessary equipment to stay safe when severe weather strikes. OSHA's [Hurricane Preparedness and Response](#) page provides information on creating evacuation plans and supply kits and reducing hazards for hurricane response and recovery work.



OSHA Grantees Offer Online Training Programs on Fall Prevention

Two [Susan Harwood Training Grant Program](#) recipients have developed free training programs to help protect construction workers from fall hazards.

The [University of Tennessee](#) training program offers three modules on OSHA's role in workplace safety, health and safety standards affecting construction workers, and preventing common types of falls at construction sites. The [University of Florida](#) training program uses

software to present 360-degree panoramas of construction scenarios to test trainees' skills at identifying fall hazards. The training software is available in English and Spanish.

New OSHA Alert Focuses on Working Safely in Hot Weather

A new [OSHA Alert](#) offers information and resources to protect workers from heat-related illness when performing activities in high temperatures and humid conditions. The latest in a [series of alerts](#) addresses safety hazards and solutions that are associated with specific equipment, events, or activities.



Legal Corner**WORKPLACE SAFETY REGULATORY UPDATE**

Prepared by Lawrence P. Halprin, Partner

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**OSHA's RFI on its Lockout/Tagout Standard:
An Opportunity and a Challenge**

On May 20, 2019, OSHA issued a Request for Information (RFI) in connection with its plan to amend the OSHA Lockout/Tagout (LOTO) Standard, 29 C.F.R. 1910.147. The LOTO Standard "covers the servicing and maintenance of machines and equipment in which the **unexpected** energization or start-up of the machines or equipment, or release of stored energy, could harm employees." According to the RFI, OSHA is seeking information in two areas "where modernizing the Lockout/Tagout standard might better promote worker safety -- (1) use of reliable control circuit type devices in lieu of energy isolation where they are "at least as safe," and (2) robotics. The apparent objective of this rulemaking is to clarify what measures, short of full energy isolation, provide effective protection to employees performing maintenance and servicing activities, and it may apply to minor servicing activities and testing and positioning activities. Unless employers fully engage in this proceeding, they may find that the outcome of this initiative imposes huge additional costs in the form of retrofits or restrictions on current practices and does not provide the expected clarification. This article describes what we see as the primary opportunities and challenges presented by this initiative. Comments are due August 19, 2019.

Opportunities: Certainty, greater flexibility and improved machinery offerings.

For those employers already relying on the use of reliable control circuits to prevent **unexpected** start-up or release of energy from energized equipment and avoid coverage of the LOTO Standard (and its requirement for de-energization/energy isolation), this initiative should eliminate the current uncertainty as to whether the measures they currently use are legally adequate. It would also allow machinery manufacturers to explicitly embrace the use of their machinery in this manner. It may also provide greater flexibility. For those employers who would like to take advantage of this technology for the first time, and for those employers who would like to expand their use of this technology to control hazardous energy while performing maintenance and servicing activities, this initiative provides a golden opportunity to educate OSHA on the appropriate uses of this technology. It would also encourage machinery manufacturers to seek other opportunities for the application of this technology.

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Challenges: Taking advantage of newer technology to effectively protect workers from hazardous energy sources without taking on significant new burdens.

The court and the OSH Review Commission decisions currently recognize that reliable control circuits can effectively prevent **unexpected** start-up or release of energy from energized equipment and, in those situations, the OSHA Lockout/Tagout Standard does not apply. Under current law, OSHA has the burden of proving that the use of control circuits does not prevent **unexpected** start-up or release of hazardous energy. It seems clear from the Standards Improvement Project IV Final Rule that OSHA plans to overturn current law under *GM Delco* by amending the LOTO Standard.

We anticipate that OSHA will propose to eliminate the eight uses of the word "unexpected" from the LOTO Standard so that all energy control measures are subject to the OSHA LOTO Standard. The LOTO Standard is currently interpreted by OSHA to limit the ability to use control circuits (instead of energy isolation) under the exceptions for "minor servicing activities" (on the basis that LOTO would prevent economic use of the equipment) and "testing and positioning activities" (on the basis that LOTO would make it technically impossible to make the changes needed to use the machine). This means the LOTO Standard must be amended to recognize the broader use of reliable control circuits as an alternative energy control measure.

OSHA states that it believes the use of control circuit type devices is typically limited to the types of tasks that do not meet the minor servicing exception in the Lockout/Tagout standard but that also do not require either extensive disassembly of the machine or worker entrance into hazardous areas that may be difficult to escape quickly, and identifies machine setup as an example. For both OSHA and employers, the big challenges involve formulating the language that would be used to define and authorize the expanded use of reliable control circuits rather than energy isolation, and ensuring the changes are understandable to OSHA personnel, employers and employees. For that reason, "OSHA is requesting information about how employers have been using these devices, including information about the types of circuitry and safety procedures being used and the limitations of their use, to determine under what other conditions control circuit type devices could safely be used."

In revising the LOTO Standard, it also appears that OSHA will identify the use of reliable control circuits as an exception to the general rule and take the position that, if an employee could be exposed to hazardous energy, without regard for existing control measures, the standard applies. This means that control measures would be considered adequate only if they satisfy the requirements of the amended LOTO Standard. This would dramatically shift the burden of proof from OSHA's current burden of showing a potential for **unexpected** energization, start-up or release of energy to the employer having the burden of showing its reliable control circuit meets some specified level of safety performance.

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According to OSHA, it issued a variance in 2016 authorizing the applicant to use reliable control circuitry rather than energy isolation for a specific task after performing a safety review of the complete system and concluding:

- (1) that the alternate device allowed energy control measures to remain under the personal control of the exposed employee;
- (2) that employees were able to verify "de-energization";
- (3) that authorized employees were easily identified before equipment restart; and
- (4) that the alternative system could (as a whole) be considered as protective as an energy isolating device, considering the potential for component failures and attempts to bypass the system.

In using phrases such as "as protective as," "at least as safe," or "an effective alternative to full lockout," we believe OSHA recognizes this determination must be based on objective criteria tied to risk assessment. Hiring a qualified expert to perform such an assessment for each machine would be prohibitively expensive. OSHA suggests the possibility of determining whether a system can achieve a certain "safety integrity level" under IEC standards or "performance level" under ISO standards and, in effect, is asking what level would reduce the risk to an acceptable level. At the highest levels, the costs can be dramatically higher. How would those levels be assessed if not provided by the manufacturer? What if the manufacturer provides an assessment for the machine prior to integration into a manufacturing line? What if the machine is subsequently modified by the user?

There is also the question of how to address older equipment where employers may currently be relying on safety circuits that do not achieve the "safety integrity level" or "performance level" that OSHA may deem necessary. Would OSHA, depending on the "safety integrity level" or "performance level" achieved, and the history of use of the equipment, consider grandfathering that equipment with or without some phase-in of required retrofitting? If so, to what level? Finally, there needs to be some appropriate mechanism for OSHA to verify and an employer to demonstrate that the control circuitry satisfies the applicable criteria. In issuing the referenced variance, OSHA took approximately two years to determine one control circuit-based system at one site was acceptable for one task.

OSHA's RFI says the agency is seeking information on how "modernizing the Lockout/Tagout standard might better promote worker safety without additional burdens to employers." Experience teaches the value of considering the potential outgrowth of this initiative. How would your operations be affected if OSHA compliance personnel interpreted the "alternative measures that provide effective protection" requirement of the minor servicing exception to require use of the same reliable control circuits discussed above. If the impact would be significant, OSHA needs to hear about that now rather than later.

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We have identified some of the critical issues that employers, in consultation with equipment manufacturers, need to address in response to this RFI. The complexity of these technical, policy and legal issues is far too great to address in the traditional, single-proposal, rulemaking process. By the time the agency issues a formal proposal, it is likely to have already made most of the critical decisions and it is generally extremely difficult to convince the agency to make a major change in direction at that point in the process. We do not believe the current ANSI Z244.1-2016 standard provides the necessary flexibility to employers. The current exception from LOTO for minor servicing activities was added at the 11th hour at the direction of OMB and the current ability to rely on reliable control circuitry to avoid coverage under the LOTO Standard was the result of a rare court decision that rejected OSHA's interpretation of the LOTO Standard. Failure to weigh in on these issues now could result in huge and unnecessary economic costs.

Clarifying the Scope and Objectives of OSHA's Initiative to Replace its Fire Brigade Standard with a Comprehensive Emergency Responder Preparedness Program Standard

OSHA apparently has concluded that it needs to develop a set of standards, rather than a single comprehensive emergency responder standard, that would address the full range of hazards or concerns currently faced by emergency responders. This would be accomplished by a combination of (1) enhancing an undetermined number of the approximately 100 existing standards listed on OSHA's *General Business Preparedness for General, Construction and Maritime Industries* web page and (2) creating a new comprehensive emergency responder program standard. The new standard would replace the existing OSHA Fire Brigade Standard and address all of the other hazards faced by responders that would not be covered by enhancements of existing standards. Possibly as a trial balloon, OSHA suggested it was considering the idea of adopting the draft ***Emergency Responder Preparedness Program Standard*** prepared by NACOSH ("Draft Standard") for this purpose although that standard appears to have been written for situations in which a major fire department is responding to a large-scale incident.

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As currently written, the Draft Standard would be applicable to every private sector employer in the United States who has personnel that respond to an “emergency incident” by providing any form of emergency assistance rather than simply evacuating the facility. This assistance could include any of the following situations or any other emergency (urgent) situation requiring a rapid response:

Extracting a worker with a body part trapped in a machine (e.g., conveyor belt) that requires lockout or other appropriate energy control and disassembly of the machine by the employer’s personnel.

Freeing a worker trapped under collapsed/dropped/toppled: building components; equipment (e.g., motor lifted by hoist falls onto mechanic); materials (worker buried under collapsed pallets of bagged raw material). This could be a manual task or may involve the use of lifting equipment such as a crane, hoist or forklift;

Responding to motor vehicle accidents: PIT or other motor vehicle rollover or collisions at employer’s facility;

Rescue from confined spaces (listed in reg text although covered by OSHA Permit-Required Confined Spaces Standard).

Response to hazardous material releases (listed in the reg text although partially covered by OSHA HAZWOPER Standard).

Response to potential or actual failure of a building structural component (e.g., failing roof or roof collapse due to, for example, snow loading; potentially failing or failed wall or structural support due to unknown cause, PIT collision),

Responding to incidents of workplace violence-- active shooters or other ongoing workplace violence incidents;

Response to natural disasters: hurricanes, tornadoes, earthquakes, flooding from natural causes;

Response to fires

Response to utility system failures:

- a potentially failing or failed water system pipe, which would result or results in facility flooding with the potential for personal injury (e.g., slips and falls, electrical shock), damage to equipment and business shutdown;

- an electrical system failure that results or has the potential to result in loss of control of a chemical process, or personnel stranded in dangerous conditions

- a natural gas leak.

- Rescue at heights

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Under the Draft Standard, it appears that an employer who elects to have its employees provide emergency assistance in response to an emergency event would have to implement the following measures:

- (1) a comprehensive facility vulnerability and risk assessment of hazards within the area where the emergency service(s) it provides is/are expected to be performed;
- (2) documenting how the emergency response organization will be incorporated into large-scale mitigation effort(s) managed by Federal or State agencies;
- (3) documenting how the emergency response organization will integrate and work within a unified command structure;
- (4) a comprehensive risk management plan for the organization;
- (5) a responder medical/fitness subprogram (e.g., medical requirements, physical performance requirements, medical evaluation);
- (6) formal facility, equipment and vehicle preparedness;
- (7) extensive pre-incident planning;
- (8) emergency response SOPs;
- (9) adopting a formal incident management system;
- (10) implementing formal emergency incident command and management procedures.

Clearly, many aspects of the Draft Standard are not appropriate for many types of rescue. For example, assume an employee has a hand trapped in a machine (e.g., a conveyor belt) and a mechanic needs to disassemble the equipment to free the employee. There is no need for any of the ten foregoing measures that would be required by the Draft Standard.

In addition to these measures being unnecessary and inappropriate, most organizations do not have the resources to develop such a program. Nor do they have the resources to go through an extensive review of the provisions of the standard to justify and document why those requirements were not applicable in a given case. Furthermore, a facility vulnerability and risk assessment of hazards could create an audit-like report of what OSHA might view as inadequately addressed hazards.

If OSHA were to adopt the Draft Standard, the obligations that would be imposed on an employer that elects to provide voluntary emergency response to a covered emergency would be so burdensome as to cause many employers to elect not to initiate a response and to wait for the local fire department or other emergency response service. Those requirements could be so onerous, if not relaxed, as to cause some states to consider abandoning their state plans, and some emergency response services to discontinue operations.

OSHA's approach in this initiative also raises concerns about the potential for conflicting compliance obligations if the various emergency responder standards are not consistent and, in some cases, uniform. For example, there will be incidents involving both chemical releases (covered by HAZWOPER) and fires (covered by the standard under development). The standards need to be written to facilitate a response that is appropriate for the incident.

The Small Business Review of a draft OSHA Emergency Responder Program Standard was scheduled to begin last month and is expected to begin shortly ... unless some of these concerns have caused OSHA to rethink its approach.

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OSHA Releases Spring 2019 Regulatory Agenda

Last month, the Occupational Safety and Health Administration (OSHA) released its updated [regulatory agenda](#), which includes a number of rulemakings slated to be proposed or finalized in the coming months. This Spring 2019 agenda highlights OSHA's priorities for regulatory action in the near future.

In addition to the Lock-Out/Tag-Out RFI and the Emergency Response initiative described above, there were three other notable rulemakings included on the regulatory agenda:

1. **Silica Standard for Construction:** OSHA stated its intention to publish a Request for Information (RFI) by May 2019 soliciting comment on potential updates to Table 1 of the Silica Standard for the Construction Industry. Construction industry employers who comply with the engineering controls, work practices, and respiratory protection specified for the task in Table 1 are not required to perform exposure assessments or comply with the permissible exposure limit in the silica standard. OSHA is interested in gathering information from stakeholders on the effectiveness of control measures, tasks and tools that are not currently listed in Table 1 and will evaluate information to determine if revisions to Table 1 are appropriate.

2. **Lock-Out/Tag-Out:** On May 20, 2019, OSHA published in the Federal Register an RFI to solicit input on two areas where "modernizing" the Lock-Out/Tag-Out (LOTO) standard "might better promote worker safety without additional burdens to employers." First, OSHA seeks information about the safe use of control circuit type devices, which are currently excluded from OSHA's definition of energy-isolating device, to control of hazardous energy. OSHA also solicits information about controlling hazardous energy from the use of robotics technology in the workplace. Comments are due in response to the RFI by August 19, 2019.

3. **Hazard Communication:** OSHA stated its intention to publish its much-anticipated proposed rule to harmonize the Hazard Communication Standard (HCS) with the "latest edition" of the Globally Harmonized System of Classification and Labeling of Chemicals (GHS). OSHA intends to publish the proposed rule by December 2019. OSHA acknowledges that the GHS is a "living document and has been updated several times since OSHA's [March 2012] rulemaking." OSHA notes in the agenda that the HCS is currently based on Revision 3 of the GHS, while the United Nations has completed Revision 7. Revision 8 is due to be released this summer.

4. **Workplace Violence in Health Care:** OSHA stated its intention to initiate a Small Business Regulatory Enforcement Fairness Act (SBREFA) panel to address the issue of preventing workplace violence in healthcare and social assistance industries. OSHA already published an RFI in 2016 that solicited input on issues and prevention strategies to consider in developing a standard. The profile of this issue has been raised in Congressional hearings at which [Manesh Rath testified](#) in light of the introduction of the "[Workplace Violence Prevention for Health Care and Social Service Workers Act](#)" introduced in February of this year.

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5. Emergency Response: OSHA stated its intention to initiate a SBREFA panel by May 2019 which will consider updates to OSHA's various emergency response and preparedness standards. The SBREFA panel will include several issues for a potential draft standard, including organization risk management, facility and equipment preparedness, standard operating procedures and incident management, and medical/fitness requirements.

OSHA also released an update of its "Long Term Actions" list, which, notably, includes its Process Safety Management (PSM) Standard and "Drug Testing Program and Safety Incentive Rules."

OSHA was directed by Executive Order 13650 to modernize the PSM standard following the West Fertilizer Company facility explosion in 2013. OSHA has already collected feedback on various proposals to revise the PSM Standard in response to the 2014 RFI and the 2016 SBREFA panel. OSHA indicates on the agenda that action on the PSM standard is "to be determined."

As for drug testing and safety incentive programs, OSHA expects to issue a proposed rule in September 2020 that would "memorialize" an October 2018 [field memorandum](#) clarifying OSHA's position on drug testing and safety incentive programs following the issuance of the "[Improve Tracking of Workplace Injuries and Illnesses](#)" rule.

To read the full agenda, visit the Office of Information and Regulatory Affairs (OIRA) [website](#).

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.

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Article Citations:

<https://www.osha.gov/sites/default/files/laws-regs/federalregister/2019-05-20.pdf>

OSHA states the modernization of the LOTO Standard would be accomplished "without additional burdens to employers." However, this assertion appears to be based on the inappropriate assumption that the precedent established by *GM Delco* decision issued by the US Court of Appeals was erroneous and should be ignored. In *Reich v. General Motors Corporation*, 89 F.3d 313 (6th Cir. 1996) ("*GM Delco*"), the court held that the OSHA LOTO Standard does not apply where control circuitry adequately delays and warns the potentially exposed employee about equipment start-up so that start-up would not be "unexpected" and the exposed individual would have adequate time to vacate the zone of danger. Subsequent case law has appropriately extended the holding of *GM Delco* to exempt servicing and maintenance activities from LOTO where the use of control circuits effectively prevents, rather than simply delaying, machine start-up. This principle has been applied where a control circuit was locked in a shutdown mode that reliably prevented start-up and would logically extend to situations where a reliable control circuit device, such as an interlocked barrier guard, is blocked open by a body part of the person performing the maintenance and servicing activity.

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

<https://www.osha.gov/sites/default/files/laws-regs/federalregister/2019-05-14.pdf>

<https://www.reginfo.gov/public/do/eAgendaViewRule?pubId=201904&RIN=1218-AC91>

<https://www.osha.gov/SLTC/emergencypreparedness/gettingstarted.html>

See the Draft Section 1910.156, *Emergency Responder Preparedness Program Standard*, prepared by the Emergency Response and Preparedness Subcommittee of the National Advisory Committee On Occupational Safety And Health, posted at <http://fire.nv.gov/uploadedFiles/firenv.gov/content/Boards/BFS/Item10handoutFinalDraftreglanguagebyERPSubCom01172019.pdf>

OSHA's slide presentation on this initiative references the incidents linked to 9/11, Hurricane Katrina, Super Storm Sandy or the BP Gulf Coast oil spill as support for this initiative.

About PPSA

PPSA is a non-profit, non-political, international organization, devoted to safety throughout the pulp, paper, and forest products 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 those members a forum for discussion.

Membership in the Association is categorized by operating facility, such as a paper mill, box plant, sawmill, woodlands, etc. Approximately 380 operating facilities are currently PPSA members. We also welcome supplier members to join PPSA and we plan on extending membership opportunities to contractors that provide services to the companies in our association.

Membership in the Association has many advantages:

- The Pulp and Paper Safety Association is the ONLY national organization exclusively concerned with accident prevention in the forest product industry.
- 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.
- 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 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 forum recognizing individuals, activities, and accomplishments that have significantly advanced the safety profession in the pulp and paper industry.
- The annual conference provides a fine external motivational boost to hourly Safety Committee members as recognition for their active participation in your comparable safety program.
- The cost of membership is the lowest of any association to our knowledge.
- The attendance of vendors at our annual conference allows members 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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www.ppsa.org



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Letter to Distributors

Stop Use & Recall Notice IMMEDIATE ACTION REQUIRED**3M™ DBI-SALA® Nano-Lok™ edge Twin-Leg Self Retracting Lifeline**

July 25th, 2019

Dear 3M Fall Protection Distributor:

3M Fall Protection announces an immediate stop use and product recall of the 3M™ DBI-SALA® Nano-Lok™ *edge* and Wrap Back Twin-Leg Self Retracting Lifelines. The twin-leg Nano-Lok *edge* is part of a personal fall protection system and connects two self-retracting lifelines/devices (SRL's/SRD's) directly under the dorsal d-ring of a worker's harness. It is intended to be anchored at foot-level, and is designed for sharp edge applications. The twin-leg Wrap Back Nano-Lok is intended for wrapping around an anchor and incorporates a similar energy absorber. 3M has determined that in the event of a fall and under certain conditions, the energy absorber may not properly deploy which could expose the worker to serious injury or death. Although there have been no reports of accidents or injuries associated with this issue, these products must be removed from service immediately.

To address this situation in the interests of worker safety, 3M is launching a global stop use of the Nano-Lok *edge* and Wrap Back Twin-Leg SRL units and is recalling all these units to be repaired or replaced as soon as a solution is identified, tested and certified. In the interim, and until a repair or replacement is available, end-users may elect to receive cash for their returned units as described below. This stop use and recall affects all versions of the Nano-Lok *edge* and Wrap Back Twin-Leg SRL's since first introduced in 2013.

Upon receipt of this Notice, please contact our Customer Service department at 1-833-638-2697 or email us at 3musfpserviceaction@mmm.com to obtain a listing of all Nano-Lok *edge* and Wrap Back Twin-Leg SRL's sold to you. If you have any of these units in stock, please return them to 3M Fall Protection for credit at 3M's expense. If you have any of these units in stock, please return them to 3M Fall Protection for credit at 3M's expense.

Please immediately forward this Notice to any of your customers/users who have purchased Nano-Lok *edge* and Wrap Back Twin-Leg SRL's from you with an urgent request that they read and comply with this Notice. Alternatively, if you provide us with a list of customers who have purchased the units from you, 3M Fall Protection will communicate directly with your customers.

Thank you in advance for your support and cooperation in reaching your customers with this information.

Please email any questions to: 3MUSFPServiceAction@mmm.com

Frank Courtemanche, Global Quality Manager

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