



# U. S. Chemical Safety and Hazard Investigation Board

## RECOMMENDATION STATUS CHANGE

### SUMMARY

<b>Report:</b>	Evergreen Packaging Mill – Fire During Hot Work
<b>Recommendation Number:</b>	2020-07-I-NC-R2
<b>Date Issued:</b>	September 24, 2021
<b>Recipient:</b>	Occupational Safety and Health Administration
<b>New Status:</b>	Closed – Reconsidered/Superseded <i>(Superseded by 2021-01-I-TN-R1)</i>
<b>Date of Status Change:</b>	June 8, 2023

#### Recommendation Text:

*Require Owner/Operators to ensure the coordination of simultaneous operations involving multiple work groups, including contractors. Include in the requirement for Owner/Operators to ensure the following activities occur:*

- *Identification of potential simultaneous operations*
- *Identification of potential hazardous interactions*
- *Evaluation and implementation of necessary safeguards to allow for safe simultaneous operations*
- *Coordination, including shared communication methods, between the simultaneous operations*
- *Inclusion of emergency response personnel or services in the planning and coordination of the simultaneous operations*

*As necessary, seek the regulatory authority to promulgate this requirement.*

#### Board Status Change Decision:

##### A. Rationale for Recommendation

On September 21, 2020, a paper mill operated by Evergreen Packaging (Evergreen) in Canton, North Carolina, was undergoing a planned shutdown, and associated maintenance and capital project work was ongoing throughout the facility. In one of Evergreen’s pulp bleaching units, two contract companies were performing simultaneous maintenance work inside two connected process vessels, called an “upflow tower” and a “downflow tower,” when a fire started inside the upflow tower after an electric heat gun, which was being used to warm resin, fell into a five gallon bucket containing the flammable resin. The fire fatally injured two contractors.

The U.S. Chemical Safety and Hazard Investigation Board (CSB) investigated the incident and found that the workers did not recognize or control the ignition hazard presented by the electric heat gun. The CSB also found that the contractors did not effectively coordinate simultaneous entry operations and did not have a shared communication method. In addition, Evergreen did not have a simultaneous operations program in place at the time of the incident to facilitate coordination between parties performing work close together in time and place. The CSB

concluded that a regulatory requirement for Owner/Operators to ensure the coordination of simultaneous operations (SIMOPs) involving multiple work groups, including contractors, would improve worker safety in industry.

As a result of the investigation, the CSB issued two new recommendations to the Occupational Safety and Health Administration (OSHA). This status change summary pertains to **CSB Recommendation No. 2020-07-I-NC-R2**.

#### B. Response to the Recommendation

OSHA acknowledged receipt of the recommendation in a letter received by the CSB during March of 2022. OSHA stated they were reviewing and evaluating their best course of action to address the hazards identified in the investigation report. OSHA and CSB staff discussed the recommendation following receipt of that letter, but no further formal response was received from OSHA.

This recommendation was superseded by **CSB Recommendation No. 2021-01-I-TN-R1** from the CSB's [Wacker Polysilicon Chemical Release Investigation Report \(2023\)](#).

#### C. Board Analysis and Decision

CSB policy allows a recommendation to be superseded when it is replaced by a new more appropriate recommendation to the same recipient and covering the same or similar issues. **CSB Recommendation No. 2020-07-I-NC-R2** stemmed from an incident that occurred in a confined space and was directed at owners and/or operators. **CSB Recommendation No. 2021-01-I-TN-R1** is a more appropriate recommendation in that it directs OSHA to require employers to coordinate SIMOPs for both general industry and construction activities and is not limited to activities occurring within confined spaces.

The Board appreciates OSHA's efforts regarding the original recommendation and looks forward to their continued cooperation in implementing the superseding recommendation. Based upon the information above, the Board voted to change **CSB Recommendation No. 2020-07-I-NC-R2** to: **"Closed –Reconsidered/Superseded."**