Develop and implement a formalized and comprehensive Simultaneous Operations (SIMOPs) program addressing planned work occurring close together in time and place to include policies, procedures, hazards reviews, hazards abatement, training, and shared communication methods, to protect employees and contract workers from the hazards posed by simultaneous operations at its facilities. At a minimum, the program should:

- Identify potential simultaneous operations
- Identify potential hazardous interactions
- Evaluate and implement necessary safeguards to allow for safe simultaneous operations
- Ensure coordination, including shared communication methods, between the simultaneous operations
- Include emergency response personnel or services in the planning and coordination of the simultaneous operations.

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 concluded that Evergreen’s contractor safety handbook and site orientation program’s definition of hot work did not align with Evergreen’s internal hot work policy. 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.
As a result of the investigation, the CSB issued three new recommendations to Evergreen Packaging. This status change summary pertains to CSB Recommendation No. 2020-07-I-NC-R4.