



STATE OF WASHINGTON  
DEPARTMENT OF LABOR AND INDUSTRIES

Division of Occupational Safety and Health  
PO Box 44600 • Olympia, Washington 98504-4600

August 22, 2024

GEORGIA PACIFIC CONSUMER OPERATIONS LLC/GEORGIA  
PACIFIC CONSUMER OPERA  
133 Peachtree Street Ne  
Atlanta, GA 30303

Inspection: 317978925  
UBI: 603096925  
Region: 04 – Safety  
Inspector ID: C1900  
Reference: 102417016

Enclosed are the results of the safety and health inspection of your workplace. This packet contains:

- **Citation Invoice** – the total assessed penalty is \$648,292.00.
- **Citation and Notice of Assessment** – Washington Administrative Code (WAC) Violations.
- **Employer Certification of Abatement instruction and form** - Correct all violations and return written verification or penalties may result.
- **Employer Appeal Rights** – You have 15 working days to appeal this citation.

You must immediately post this Citation and Notice of Assessment at or near where the violation(s) occurred, where employees can easily find and read it, or where employees normally receive posted information. All postings must remain until you have corrected all violations, or for seven working days, whichever is longer. “Working day” means a calendar day, except Saturdays, Sundays and all legal state holidays.

Because this inspection is public information, the result will be posted by the Department of Labor & Industries. You may view it at <https://secure.lni.wa.gov/verify>.

**Please visit <https://www.lni.wa.gov/agency/public-disclosure/> if you would like to request a copy of the inspection file. Your choices are:**

- Safety & Health Citation Only
- Safety & Health Brief Inspector Summary Report (short description the inspector writes to summarize the reason for the inspection only – not complete file)
- Safety & Health Citation and Complete Inspection File (The complete legal file which contains the detailed information regarding the inspector’s findings, the citation, and calculation of any penalty. This will be especially helpful if you are contemplating filing an appeal.)

August 22, 2024

GEORGIA PACIFIC CONSUMER OPERATIONS LLC/GEORGIA PACIFIC CONSUMER OPERA

Page Two

**If you have questions, call the compliance supervisor, Allen Brannan, at (360) 896-2387.**

Respectfully,

L&I Assistant Director  
Division of Occupational Safety & Health  
Enclosure(s)

Copy: AWPPW, Local 5

**Invoice**

**Inspection: 317978925**

UBI: 603096925	Issued: August 22, 2024
Legal Name: GEORGIA PACIFIC CONSUMER OPERATIONS LLC	Opening Conference: March 09, 2024
DBA Name: GEORGIA PACIFIC CONSUMER OPERA	Closing Conference: August 15, 2024
Inspection Site: 401 Ne Adams St, Camas, WA 98607-2135	Inspector ID: C1900

**Summary of Assessed Penalties Due**

The Citation and Notice of Assessment includes a full description of each violation.



Violation Item	Violation Type	WAC	Abatement Due Date	Penalty Amount
1-1-A	Willful Serious	WAC 296-79-030(2)	Corrected	\$161,323.00
1-1-B	Willful Serious	WAC 296-806-20028	Corrected	\$0.00
1-2-A	Willful Serious	WAC 296-803-50005(1)	Not Applicable	\$161,323.00
1-2-B	Willful Serious	WAC 296-803-20005(5)	08/26/2024	\$0.00
1-3	Willful Serious	WAC 296-803-50010(3)	Not Applicable	\$161,323.00
1-4	Willful Serious	WAC 296-79-020(5)	Corrected	\$161,323.00
2-1	Serious	WAC 296-803-50025(1)	Not Applicable	\$3,000.00
<b><u>Total Penalty Due</u></b>				<b>\$648,292.00</b>

**PAYMENT INFORMATION**

**Payment is due 15 \*working days from receipt of this citation (unless appealed).**

Pay L&I the amount due on this invoice by scanning the QR code listed below, or by visiting [www.lni.wa.gov/agency/pay-a-balance-due/](http://www.lni.wa.gov/agency/pay-a-balance-due/)

You may also mail a check made payable to the Department of Labor and Industries. Write Inspection number 317978925 on the check and mail to:

<p><b>Attn: DOSH Cashier</b>  <b>Department of Labor and Industries</b>  <b>PO Box 44835</b>  <b>Olympia, WA 98504-4835</b>          Or deliver to: Any L&amp;I office</p>	 
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\*Working day” means a calendar day, except Saturdays, Sundays, and all legal state holidays.



## Post This Document

# Citation and Notice of Assessment Citación por Infracción y Multa Civil Inspection: 317978925

UBI: 603096925

Issued: August 22, 2024

Legal Name: GEORGIA PACIFIC CONSUMER OPERATIONS LLC

Opening Conference: March 09, 2024

Closing Conference: August 15, 2024

DBA Name: GEORGIA PACIFIC CONSUMER OPERA

Inspector ID: C1900

Inspection Site: 401 Ne Adams St, Camas, WA 98607-2135

### Violation 1 Item 1 A WAC 296-79-030(2)

Violation Type: Willful Serious

The employer did not ensure that when permanent guards are removed, they are replaced with guard's equivalent to the permanent guards removed or replaced with adequate temporary safeguards prior to putting machines into operation as required by the code cited.

In the following instances, the employer removed the permanent machine guards and replaced them with a perimeter fence erected around the machine, exposing employees to serious injury and death:

1. A perimeter fence, erected around the machinery, was what Georgia Pacific used to replace the permanent guards they removed from Unitizer Machine, Side-A.
2. A perimeter fence, erected around the machinery, was what Georgia Pacific used to replace the permanent guards they removed from Unitizer Machine, Side-B.

Exposure to hazards of this nature can lead to serious injuries involving permanent disability, death, or chronic irreversible illness.

**This violation was corrected during the inspection.**

**Assessed penalty: \$161,323.00**

**Citation and Notice of Assessment**  
**Citación por Infracción y Multa Civil**  
**Inspection: 317978925**

**Violation 1 Item 1 B**  
WAC 296-806-20028

Violation Type: Willful Serious

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The employer did not protect employees from the point-of-operation as required by the standard cited above and DOSH Directive 8.40 Citing Point-of-Operation and Machine Safety.

In the following instances, the employer created hazards by removing four point-of-operation guards from two machines, exposing all Unitizer machine operators to serious injuries and death when entering the perimeter gates to perform maintenance tasks:

1. Two point of operation guards were removed from Unitizer Machine, Side-A. One guard for each arm, located on each side of the machine.
2. Two point of operation guards were removed from Unitizer Machine, Side-B. One guard for each arm, located on each side of the machine.

The violations above have been grouped because they involve similar or related hazards that may increase the potential for illness or injury resulting from an exposure or accident. A single penalty is applied to the first item in the group.

**This violation was corrected during the inspection.**

**Assessed penalty: \$0.00**

**Citation and Notice of Assessment**  
**Citación por Infracción y Multa Civil**  
**Inspection: 317978925**

**Violation 1 Item 2 A**  
WAC 296-803-50005(1)

Violation Type: Willful Serious

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The employer did not ensure that energy control procedures were used to protect employees servicing or maintaining machines and equipment from potentially hazardous energy as required by this standard.

It was documented during the inspection that three (3) employees performed maintenance tasks on the A and B side Unitizer machines without using energy control procedures.

Exposure to hazards of this nature can lead to serious injuries involving permanent disability, death, or chronic irreversible illness.

This violation was previously cited on Inspection # 317964555, final order date was 10/27/2021.

**Situation not believed to exist any longer.**  
**However, if this violation is identified again during future inspections, it may result in repeat or failure to abate violations which may include penalties.**

**Assessed penalty: \$161,323.00**

**Citation and Notice of Assessment**  
**Citación por Infracción y Multa Civil**  
**Inspection: 317978925**

**Violation 1 Item 2 B**  
WAC 296-803-20005(5)

Violation Type: Willful Serious

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The employer did not ensure energy control procedures identify the specific procedural steps for isolating stored energy, placing lockout or tagout devices and verifying effectiveness of the energy control measures.

Employees were exposed to serious machine hazards while entering the perimeter gates to A and B Unitizer machines using energy control procedures that did not specifically identify what the procedural steps were for isolating the stored energy from the machine's stacker arms, placing lockout devices for the stacker arms and how to test the machine to verify the effectiveness of the energy control measure.

The violations above have been grouped because they involve similar or related hazards that may increase the potential for illness or injury resulting from an exposure or accident. A single penalty is applied to the first item in the group.

The following additional correction documentation is required for this violation: The employer must provide the Department with an updated energy control procedure for the Unitizer machines that specifically identifies what the procedural steps are for isolating the stored energy from the machine's stacker arms, placing lockout devices for the stacker arms and how to test the machine to verify the effectiveness of the energy control measure.

Please provide these documents to:  
Corey Campbell  
Division of Occupational Safety and Health  
312 SE Stonemill Dr Ste 120  
Vancouver, WA 98664

or

Corey.campbell@lni.wa.gov



Washington State Department of  
**Labor & Industries**  
*Division of Occupational Safety and Health*

**Post This Document**

**Citation and Notice of Assessment**  
**Citación por Infracción y Multa Civil**  
**Inspection: 317978925**

**Correct By: 08/26/2024**

**Assessed penalty: \$0.00**



**Citation and Notice of Assessment**  
**Citación por Infracción y Multa Civil**  
**Inspection: 317978925**

**Violation 1 Item 3**  
WAC 296-803-50010(3)

Violation Type: Willful Serious

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The employer did not ensure employees completely isolated the machine or equipment from its energy sources with the appropriate energy isolating device after the machine or equipment was turned off.

It was documented during the inspection that operators entered the perimeter gates for the A and B Unitizer machines without applying lockout devices to isolate the energy sources of the Unitizer machines.

Exposure to hazards of this nature can lead to serious injuries involving permanent disability, death, or chronic irreversible illness.

**Situation not believed to exist any longer.**  
**However, if this violation is identified again during future inspections, it may result in repeat or failure to abate violations which may include penalties.**

**Assessed penalty: \$161,323.00**



## Post This Document

# Citation and Notice of Assessment Citación por Infracción y Multa Civil Inspection: 317978925

**Violation 1 Item 4**  
WAC 296-79-020(5)

Violation Type: Willful Serious

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The employer did not ensure that working alone procedures were used to protect employees working in remote or isolated areas as required by this standard.

It was documented during the inspection that eight (8) Unitizer operators were not covered by working alone procedures while working in an isolated area.

Exposure to hazards of this nature can lead to serious injuries involving permanent disability, death, or chronic irreversible illness.

**This violation was corrected during the inspection.**

**Assessed penalty: \$161,323.00**



## Post This Document

# Citation and Notice of Assessment Citación por Infracción y Multa Civil Inspection: 317978925

**Violation 2 Item 1**  
WAC 296-803-50025(1)

Violation Type: Serious

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The employer did not ensure that employees were protected from the hazards of stored and residual energy.

In that, one employee sustained fatal injuries while working underneath the B side Unitizer stacker arms without ensuring that the stored, residual energy was restrained and rendered safe, or was otherwise protected by fixed machine guarding.

Exposure to hazards of this nature can lead to serious injuries involving permanent disability, death, or chronic irreversible illness.

**Situation not believed to exist any longer.  
However, if this violation is identified again during future inspections, it may  
result in repeat or failure to abate violations which may include penalties.**

**Assessed penalty: \$3,000.00**



## Post This Document

# Citation and Notice of Assessment Citación por Infracción y Multa Civil Inspection: 317978925

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### Message

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This employer has been identified as a Severe Violator Enforcement case under the Washington State Department of Labor & Industries Division of Occupational Safety & Health's (DOSH), Severe Violator Enforcement Program (SVEP). Your company will be subject to follow-up inspections to determine if the conditions cited here still exist in the future. Follow-up inspections of this company will continue at a heightened level until the Department is satisfied that the conditions no longer exist.

The following violations qualify this employer for SVEP:

Willful Serious:

1-1a: Permanent guards not replaced/temporary safeguards not adequate.

1-1b: Fixed guards removed at point of operation.

1-2a: Employer did not ensure employees used energy control procedures.

1-2b: Energy control procedures did not specifically identify procedural steps for isolating stored, residual energy for the Unitizer stacker arms.

1-3: Not applying lock out devices.

1-4: Employees working alone in an isolated area.

This case has been sent to the Occupational Safety & Health Administration (OSHA). For further information, please refer to DOSH Directive 2.68 and OSHA Instruction CPL 02-00-169.

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## Employer Certification of Abatement Instructions Inspection: 317978925

### What you must do now:

- Check the correction due date(s) shown on the enclosed Employer Certification of Abatement Form. You must fully correct the hazards by these dates.
- Describe on the form how you corrected each hazard, rather than what you *intend to do* in the future. Examples:

**Right:**            *All staff have received the required training.*

**Wrong:**           *All staff will receive the required training next week.*

Use attachments if you need more space. Submit additional documentation of hazard correction if requested in the citation packet.

- Fill in the date you corrected the hazard and sign.
- Post a copy of the completed form for at least seven working days, or until you have corrected all violations, whichever is longer. It must be posted near the hazard location or in a place that is readily accessible by affected employees and their representatives.
- Send your completed form to the address provided.

**Note:** If we do not receive written confirmation you have corrected the hazards, we will take follow-up action, which may include additional penalties. If you provide us with false information, you may face criminal penalties.

### If you are unable to fix the hazard(s) by the correction due date(s):

We must receive your written request for an extension **before** the correction due date(s) listed for the hazard(s). Correction due dates are shown on the enclosed Citation and Notice of Assessment and on your Employer Certification of Abatement Form(s).

Extensions are not automatically granted. To be considered for an extension, you must provide the following:

- Inspection number, employer name, telephone number, and site address.
- Violation and Item number for each requested extension.
- Correction due date on the citation and additional time needed.
- Steps taken to fix the hazard by the correction due date.
- Why you cannot correct the hazard by the correction due date.
- How you will protect your employees until you fix the hazard.

For more information, contact:  
Or call: (360) 896-2387

Allen Brannan, Compliance Supervisor  
Department of Labor and Industries  
312 SE Stonemill Dr. Suite 120  
Vancouver, WA 98684

You must post all documentation associated with your request for extension with your citation packet. All postings must remain until you have corrected all violations, or unless you have appealed and received and posted your hearing notice.



## Employer Certification of Abatement Form

### Inspection: 317978925

UBI: 603096925 Legal Name: GEORGIA PACIFIC CONSUMER OPERATIONS LLC Inspection Site: 401 Ne Adams St, Camas, WA 98607-2135	Issued: August 22, 2024 DBA Name: GEORGIA PACIFIC CONSUMER OPERA
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**You must complete this form and return it to:**

Corey Campbell  
 Department of Labor & Industries  
 312 SE Stonemill Dr Ste 120  
 VANCOUVER, WA 98684

Or Fax to:  
 Or Email to: CCOR235@LNI.WA.GOV

Violation(s) are fully described in the Citation and Notice of Assessment section.

Violation, Item & Group#	Type of Violation	WAC# Violated	Correction Due Date
1-2-B	Willful Serious	WAC 296-803-20005(5)	08/26/2024
LOTO procedure inadequate			
<b>How you corrected the hazard →</b>			
<b>Date you corrected the hazard →</b>			

I certify that the hazards described in this Employer Certification of Abatement Form have been corrected as described above. Affected employees and their representatives have been informed of the correction activities. I am aware that knowingly providing false information may result in criminal penalties (RCW 49.17.190(2)).

Signature	Printed Name	
Title	Date	Phone No.
<b>DOSH USE ONLY</b>		

DOSH Reviewer's Signature

Date

## For Employers

If you are cited for a violation of Occupational Safety and/or Health rules, you have the right to appeal the citation. **You have 15 working days from the date you receive this citation to appeal.** (RCW 49.17.140(1)) "Working day" means a calendar day, except Saturdays, Sundays and all legal state holidays. Your appeal must be in writing. It may be mailed, faxed, personally delivered or electronically filed. If you electronically file, the Department will send an automated acknowledgement that the appeal was received. **If you do not receive acknowledgement, please ensure you have addressed it to the correct email.** You can also contact the Appeals Program at the number listed below.

For violations classified as serious, willful, repeat serious, or failure to abate serious, an employer must correct the violations by the date listed on the Citation and Notice / Employer's Certification of Abatement form unless a stay of abatement date is requested in the appeal as described on this page. A stay of abatement date means the employer's requirement to abate or correct the hazard is put on hold until the appeal is resolved. All general and repeat general violations under appeal automatically have stay of abatement dates until a final order on those violations has been issued. If you only need an extension of an abatement date, please see the above section entitled, **"If you are unable to fix the hazard(s) by the abatement due date(s)"**.

### Your appeal must include:

- Business name, address, telephone number, and contact information for the employer's representative, if any, such as an attorney or interpreter.
- Inspection Number (You will find this nine-digit number in the top right corner of this page.)
- Statement explaining:
  1. What you believe is wrong with the citation and any related facts.
  2. What you believe should be changed, and why.
  3. What relief you are seeking and why.
  4. Signature and Date.

**If you are requesting a stay of abatement date for serious, willful, repeat serious or failure to abate serious, you must also include:**

- Each violation and item number for which a stay of abatement date is requested; and
- The reason for the stay of abatement date request.

Note: Employees and/or employee representatives may elect to participate in appeal hearings.

## Posting requirement:



You must post your appeal documents (along with this citation packet) until the appeal is resolved. You must also post all other documents related to this appeal.

## For Employees or Their Representatives

If your employer is cited, you may only appeal the abatement due date(s).

### Your appeal must include:

- Your name, address, telephone number, and the same information for anyone who is representing you, if any.
- Inspection number.
- Statement explaining why the abatement due date should be changed.

Send all Appeals to:	Scan the QR Code below to:	
<p><b>Assistant Director for DOSH Services</b>  <b>Attn: DOSH Appeals</b>  <b>PO Box 44604</b>  <b>Olympia, WA 98504-4604</b>            Electronically to: <a href="mailto:DOSHAppeals@Lni.wa.gov">DOSHAppeals@Lni.wa.gov</a>            Fax to: <b>(360) 902-5581</b> or deliver to: <b>Any L&amp;I office</b></p>	<p>Complete the WISHA Citation &amp; Notice Appeal Form, OR visit</p> <p><a href="http://www.Lni.wa.gov/safety-health/safety-rules/safety-citation-appeals">www.Lni.wa.gov/safety-health/safety-rules/safety-citation-appeals</a></p>	 

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OPERATIONS LLC  
133 Peachtree Street Ne  
Atlanta, GA 30303