

May 17, 2011

OSHA Docket Office
Docket Number OSHA-2011-0056
U.S. Department of Labor
Occupational Safety and Health Administration
Room N-2625
200 Constitution Avenue, NW
Washington, D.C. 20210

Submitted online via <http://www.regulations.gov>

**RE: Request for Public Comments to Federal Register, Vol. 76, No. 55, March 22, 2011;
Voluntary Protection Programs Information; Extension of the Office of Management and
Budget's (OMB's) Approval of Information Collection (Paperwork) Requirements**

Thank you for the opportunity to comment on the paperwork requirements of the Voluntary Protection Program (hereinafter referred to as VPP). As a global company with more than 40 worksites in the U.S. participating in OSHA's VPP, International Paper continues to see great value in VPP and fully supports continuation of the program. As a stakeholder in the VPP process, International Paper would like to submit the following in response to OSHA's request for comments:

Issue 1: Whether the information collection requirements are necessary for the proper performance of the Agency's functions, including whether the information is useful;

Notwithstanding potential improvements that could be made to the information collection process (see Issue 4 below), International Paper supports the information collection requirements as necessary to properly evaluate a site's status, activities, and performance with regard to initial selection and ongoing participation in VPP.

Issue 2: The accuracy of the Agency's estimate of the burden (time and costs) of the information collection requirements, including the validity of the methodology and assumptions used;

The Challenge and Special Government Employees sections of the information request are not pertinent to International Paper operations and participation in VPP, so the company has no comment on these burdens. However, OSHA estimates the time burden of the pertinent information collection requirements as follows:

- VPP Initial Application – 200 hours
- VPP Annual Evaluation – 20 hours
- PSM Initial Application – 40 hours
- PSM Annual Evaluation – 20 hours

An evaluation of the burden imposed on International Paper sites that participate in VPP reveals the estimates of the time required to complete the VPP and PSM Initial Applications and the VPP and PSM Annual Evaluations may be understated by a factor of anywhere from 3 or more times per category, with larger sites requiring more time. It should be noted that sites submitting these documents often involve numerous people from various disciplines in the planning, preparation and submission of the Initial Application and Annual Evaluation. Members from groups as diverse as Engineering, Operations, Human Resources, EHS, Management, Labor, and Legal are all engaged in the production of documentation and input into the VPP process. Thus, it may be that OSHA has not fully considered the breadth and depth of resources required to comply with the information collection requirements.

Issue 3: The quality, utility, and clarity of the information collected;

One concern regarding the utility of the information collected is that the questions seem to generate repetitive answers. For instance, we find that a basic risk management process such as Job Safety Analysis (JSA) is a response to numerous questions found on the VPP documentation.

Issue 4: Ways to minimize the burden on employers who must comply; for example, by using automated or other technological information collection and transmission techniques.

Most of the questions on the VPP forms require a lengthy, narrative response. Ideas to reduce the burden associated with completing and submitting these documents include:

- Pre-formatted document templates in MS Word or Adobe PDF format, wherein the participant is able to simply enter information into a text box. The currently supplied free-form Word templates lend themselves to formatting inconsistencies and unintentional deletion of text.
- Use of a checklist or multiple choice format to replace narrative responses.
- Use of check boxes to indicate whether the information submitted has changed from the previous year's submission. For instance, if no information has changed in one particular section of the document from one year to the next, allow the site to check a box such as "No changes from previous year" and skip that section. The US Environmental Protection Agency makes use of such check boxes for their annual reporting requirements such as Tier II reports. It seems that OSHA could adopt a similar practice.
- The ability to submit the documentation electronically. Federal agencies such as the U.S. Environmental Protection Agency and the Department of Homeland Security have electronic options to submit data required for reports such as the Toxic Release Inventory (TRI), Risk Management Plan (RMP), and Chemical Security Assessments. The USEPA's Central Data Exchange (CDX) is an example of one such system. These agencies also develop and provide software to populate and generate the report electronically prior to submission online. Again, it would be extremely beneficial for affected parties if OSHA had a similar option for submission of VPP and other required documentation.

International Paper would again like to thank the Occupational Safety and Health Administration for the opportunity to comment on the estimated burden of paperwork requirements related to the Voluntary Protection Program. If you should have any questions or comments regarding this submission, please feel free to contact me.

Regards,

A handwritten signature in black ink that reads "Eric Barnes". The signature is written in a cursive style with a large, stylized "E" and "B".

Eric S. Barnes, CIH, CSP, CHMM
Health & Safety Program Manager