## USW HEALTH & SAFETY HAZARDALER

A Complaint filed in federal court on October 31, 2019 makes serious allegations regarding Lundberg Flame Arresters.<sup>1</sup> The Plaintiff in this case, Packaging Corporation of America, Inc., ("PCA") operates multiple facilities employing USW-represented employees. Because these Flame Arresters may be in use in USW-represented facilities, we are issuing this Hazard Alert to ensure that members are aware of these allegations.

Lundberg Flame Arresters:

Complaint Filed in Federal Court Alleges New Safety Concerns

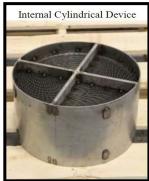


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The purpose of this alert is to update workers on potential workplace hazards; it is not intended to be a comprehensive report.. This alert does not confirm or predict the presence of a hazard and is issued for informational purposes only. The Complaint alleges that the manufacturer of Lundberg Flame Arresters "had never tested or certified the Lundberg Flame Arresters to any applicable standards, either internally or externally with a third-party testing facility." The Complaint additionally alleges that in 2018, a Lundberg Flame Arrester failed offsite testing by an independent third-party facility, and that the flame arrester "presents a risk of explosion, injury, and death to anyone working near the Lundberg Systems." Plaintiff PCA further alleges that in 2019 testing, an independent third-party testing facility found that the flame arresters actually accelerated the flame, "increasing the velocity and therefore magnitude of the explosion event."

According to the Complaint, Lundberg manufactures systems that evacuate non-condensable gases that may be combustible from the paper and pulp mill environment. These systems require specific safety devices to be installed to mitigate the risk of an explosion. In Lundberg Systems, Lundberg Flame Arresters are integrated in strategic locations and are designed to prevent a flame from spreading from one section of the system to a second section. In the Complaint, the Plaintiff states that flame arresters are meant to serve as a firewall to ensure that a flame does not lead to a

fire event in the entire system or to an explosion. The Complaint alleges that flame arresters are integral to the safety of the paper and pulp mill environment because an uncontrolled fire or explosion would put workers' lives and property at risk, and that without functioning flame arresters, many of the systems at a paper and pulp mill would not meet applicable standards, would not pass government inspections, and would not be safe to operate.



PCA states in the Complaint that an independent third-party certification facility hired to test the Lundberg Flame Arresters demonstrated

conclusively that the flame arresters were unable to perform their primary purpose. PCA alleges that based on tests conducted in 2018, the flame arresters "appeared to have latent, internal defects and an inability to eliminate flame propagation in the Lundberg Systems." PCA further alleges that 2019 testing by an independent third-party found that "it is more dangerous to install a Lundberg Flame Arrester in a Lundberg System than it is to simply install a straight pipe of the same size" and that "Lundberg Flame Arresters act as flame accelerators, not flame arresters, and are the exact opposite in performance and efficacy than a safety device."

The USW is not a party to this case and makes no claim or representation as to the accuracy of the Complaint allegations. This litigation is ongoing and the USW will update members on developments relevant to workers' safety.

1. The Complaint was filed in the case *Packaging Corporation of America, Inc.v. Lundberg, LLC*, Case 2:29-cv-01770 (W.D. Wash. 2019).

