

**U.S. DEPARTMENT OF LABOR
OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION
HARRISBURG AREA OFFICE
49 North Progress Avenue
Harrisburg, PA 17109
Telephone (717) 782-3902
FAX (717) 782-3746**



February 21, 2012

Exel, Incorporated
Eastern Distribution Center III
500 North Lingle Avenue
Palmyra, PA 17078

RE: OSHA Inspection No. 315884585

Dear Employer:

An inspection of your facility at 500 North Lingle Avenue, Palmyra, PA 17078 on August 23, 2011 through February 21, 2012 was conducted in response to a complaint alleging injuries resulting from certain work activities. Based on a review of work practices and illness and injury data at your facility we have identified potential ergonomic risk factors. The below listed tasks were identified that may be contributory in causing back and upper extremity disorders:

1. Lifting boxes from pallets sitting directly on the floor and having to bend at the waist to either retrieve or stack product.
2. Reaching to the back of pallets to retrieve boxes of product.

In the interest of workplace safety and health, I recommend that you voluntarily take the necessary steps to materially reduce or eliminate your employees' exposure to the conditions listed above.

While some ergonomic related risk factors can be reduced or eliminated by implementing a single means of abatement, in most cases a process using the well-established elements of a safety and health program will provide the most effective method of addressing these ergonomic risk factors. These components include accurate injury and illness recognition and record keeping, work place analysis of jobs and tasks sufficient to assess the hazards and propose steps for their abatement, development of engineering, administrative and work practice controls or actions to materially reduce the hazards, and education and training of workers and management such that they can recognize and report hazards at their earliest stages, and fully understand and comply with proposed work practices and abatement techniques. Additionally, the commitment of both management and employees are important to the success of a program, as is a process to continually evaluate the effectiveness of your interventions.

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We have examined available information on the risk factors related to these jobs/tasks, as well as your efforts to address ergonomic hazards. The evaluation suggests consideration be given to the following action to deal with these conditions:

1. Place pallets on scissor-lift tables to eliminate the need to bend over to retrieve or stack boxes on the bottom level of the pallet.
2. Equip the lift tables with a turntable mechanism on top of the table so that the need for reaching can be significantly reduced.
3. A mechanism should be developed for reporting signs and symptoms of MSDs early such as in safety meetings.
4. Personnel should be trained in the recognition of MSD signs and symptoms and the importance of early reporting.
5. Ensure all reported cases are evaluated by a licensed health care provider as soon as symptoms are reported and followed by the health care provider until the case is fully medically resolved.
6. Conduct training to remind employees of proper lifting techniques and equipment available to them to conduct daily activities.
7. Retain the services of a professional ergonomics to evaluate the workplace and offer site specific suggestions.

You may voluntarily provide this Area Office with progress reports on your efforts to address these conditions.

Under OSHA's current inspection protocol, we may return to your work site in approximately one year to further examine the conditions noted above.

Attached is a list of available resources that may be of assistance to you in preventing work-related injuries and illnesses in your workplace.

If you have any questions, please feel free to call the Harrisburg Area Office at (717) 782-3902.

Sincerely,



KEVIN G. KILP
Area Director

KGK/kgk