

Third Quarter, 2011
Volume 1, Issue 16



PPSA Quarterly Review

Pulp and Paper Safety Association (850) 584-3639

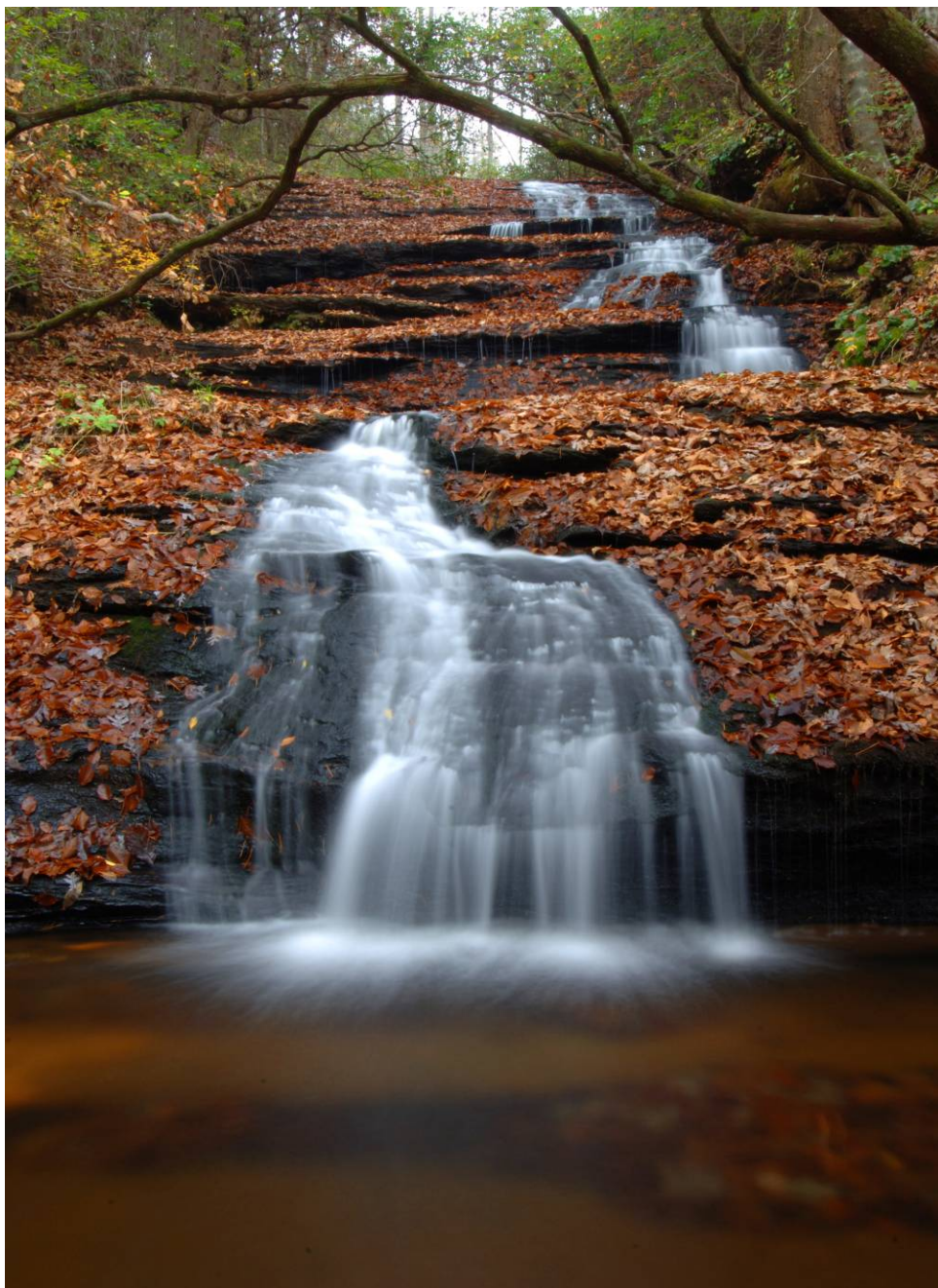
Website www.ppsa.org

Special Interest Articles:

- Chairman's Letter
- Safety
 - Safety Recalls and Alerts
- Legal Corner
- Ergonomics
- About Us

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Photos compliments of:
Temple-Inland Photo Gallery

A Letter from Our Chairman



Maintaining the course

Members, in my first communication to you as the PPSA General Chair I would like to discuss our continued work on the goals and objectives recently established by the Board of Directors. The Board recently met to discuss our vision for the organization and to confirm that the areas we feel are critical for continued growth are:

- Ensure that the 2012 PPSA Safety Conference builds upon the successes of the past conferences. The 2012 conference will be held back at the Caribe Royale Hotel and Conference Center in sunny Orlando, FL. Orlando is always a great location for families. Keep an eye out for upcoming announcements about the conference.
- Continue to produce timely and high quality quarterly reports.
- Continue to upgrade the PPSA website to be more current, user friendly, and seen by members as a source of relevant safety information for our industry,
- Conduct training seminars on those safety topics of interest to our members at a minimal cost which cannot be obtained elsewhere and finally,
- Identify and share solutions to those safety issues facing our industry and members.

Of course we will need your help and support to make these things happen.

With continued consolidation in our industry, the Board and I feel that it is more important than ever to look for innovative ways to retain members and to attract new members. To that end, we will explore the potential to offer group discounts for very large site member companies. In addition, we will continue looking for additional Board Members to make certain that we retain a solid relationship with all of the companies within our industry.

Rest assured that our organization remains on sound financial footing. While challenges lay ahead, I feel that we have set a course for continued growth and success. This allows us to once again focus more energy on our primary objective of supporting continuous improvement of safety throughout all aspects of our industry.

The board of directors and I look forward to serving you and supporting you and your companies quest for prevention of injuries and illnesses to your employees. I do want to take this opportunity to welcome new Board Member Matt Kanneberg, RockTenn.

Lastly, I would like to thank Chris Redfearn for his leadership over the last couple of years. I hope to serve the organization as well as he did. Thanks.

General Chairman – PPSA, Peter G. Masias



Safety

Safety Communication

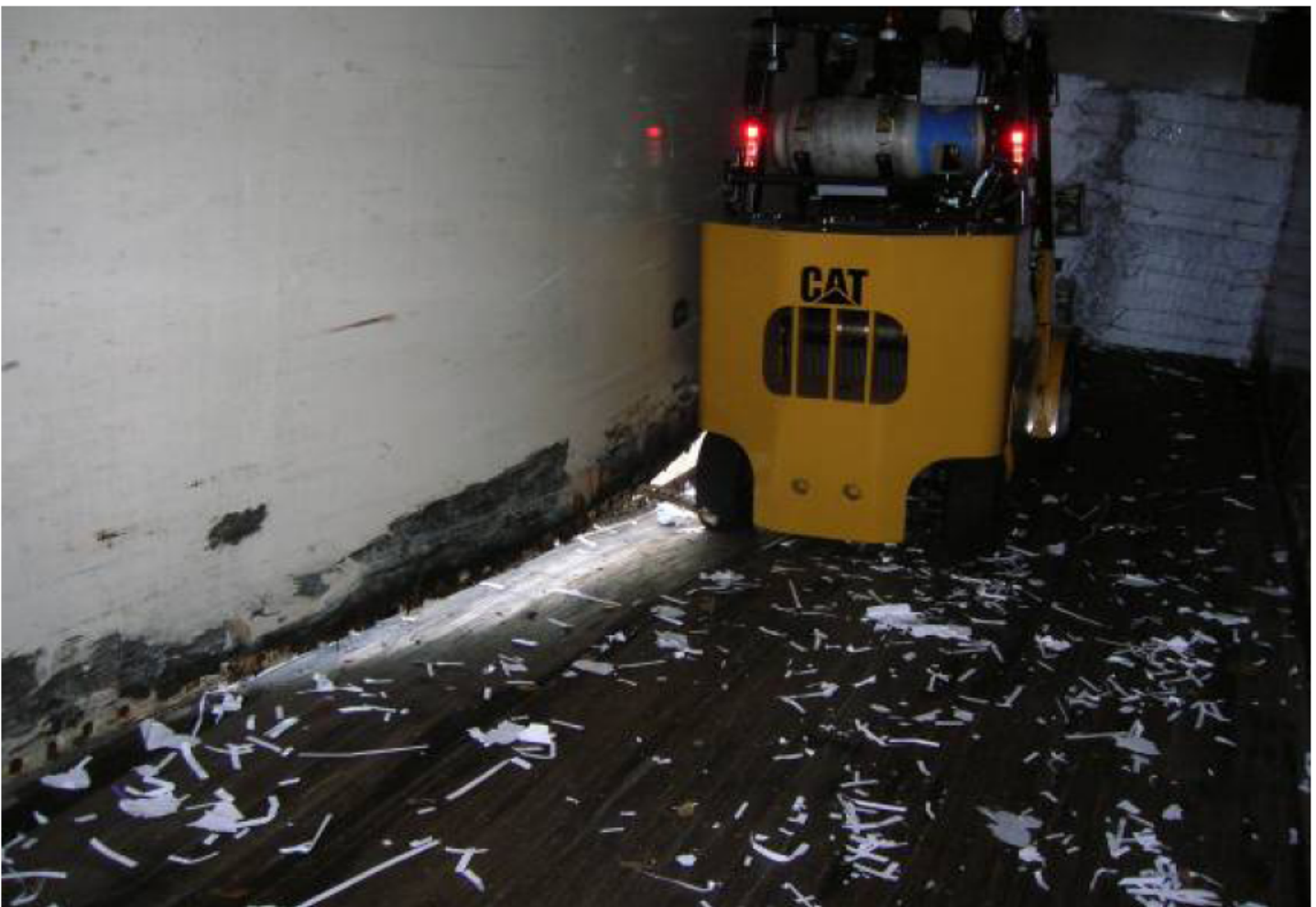
Near Miss Details:

An operator was loading a trailer with bales using a clamp truck. The operator had loaded 18 bales onto the trailer when the left side of the trailer unzipped allowing the floor to separate from the wall. The basic cause of this incident was the failure of the structural integrity of the trailer. The immediate cause was improper maintenance and repairs of the trailer by the trucking company. An inspection of the trailer was performed prior to the loading of this trailer. However, our investigation discovered that our operators did not fully understand some of the terminology on the form and did not know exactly what to look for while performing the trailer inspection.

Corrective Action(s):

Our inspection form will be revised. The form will contain pictures which will show the location on the trailer and describe exactly what to look for. A trailer inspection safety video will be added to our dock safety training. All operators will view the video before they start working on our docks. This video will also be used as one of our monthly plantwide safety trainings. A communication board will be posted in the dock locations. This board will have trailer loading rules posted on it as well as a section to post pictures, memos, and notices.





Editor's Note:

The preceding incident is only one of several similar accounts received by the editor. Facilities are encouraged to review their truck trailer loading and unloading pre-entry inspection practices and safe practice training in this area.

Summary of DVD Training Materials Available:

PPSA
Presents
Truck Trailer Loading & Unloading Safety



Note: This disk is a hybrid DVD which contains a leaders guide, test and checklist accessible through Microsoft Explorer.

Released 1.2008

The **Truck Trailer Loading and Unloading** video/CD program was created to train employees to understand the importance of recognizing structurally safe vs. unsafe trailers prior to loading or unloading. Participants will also learn to practice clamp and lift truck driving techniques which minimize the forces that damage truck trailers. This video is available in English and Spanish. A Leader's Guide is included.

DVD training and supplemental materials (in English & Spanish) are available from the PPSA for a discount member rate of \$50 (\$100 non-members) at the following link:

http://www.ppsa.org/shop.php?shop=get_item&id_field=3

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GENIE LIFT SAFETY NOTICE (#110003)

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<http://www.ipaf.org/en/resources/product-alerts/>



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1-0910-005

Safety News Flash!

Status: Near Miss	
Where:	Date of Occurrence: June 28, 2011
What Happened:	<p>Company driver out was dispatched to pick up 6 skids of paper at a customer. He arrived and was given a dock assignment. Driver was waiting in his truck and he soon felt his truck rocking as they entered the trailer.</p> <p>After a few minutes he looked in his side view mirror and saw the loader standing in the open door of the adjacent dock motioning driver to come to the rear. Driver approached the loader. The loader handed him the paperwork and had driver sign it. While driver was signing the loader walked away and started talking to a fellow employee. Driver kept his copy of the paperwork and put the signed copy on the dock edge. He then removed the wheel chock, returned to the cab, started the engine and pulled away from the dock. He stopped, and was walking back to close the trailer doors. As he was closing the first door he looked into the trailer and saw that it was empty. Just then the loader came up to him and asked why he pulled away from the dock. Driver said he heard noise and felt the trailer rock and when he was asked to sign the paperwork he assumed the trailer had been loaded. The loader responded that the rocking he felt was them having trouble getting the dock plate to drop properly in the trailer. It turned out the loader was a new employee who didn't know that paperwork is signed after the product is loaded.</p>
Contributing Factors:	A failure of training and possibly lack of consistent and well-communicated procedures.
Corrective Action:	We are contacting customer and suggesting procedure recently implemented that includes glad hand lock installed by employee to prohibit truck movement until load is complete and trailer is clear of employees and equipment.

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AFTER

Major Recall of Shock Absorbing Lanyards

Petzl America is recalling about 375,000 units worldwide that were sold beginning in 2002, the Consumer Product Safety Commission announced July 12

Jul 14, 2011

Petzl America Inc. of Clearfield, Utah, has voluntarily recalled about 375,000 Scorpio and Absorbica shock-absorbing lanyards that have been sold since 2002, the U.S. Consumer Product Safety Commission announced July 12. Some of the lanyards are missing a safety stitch on the attachment loop, which could cause the lanyard to separate from the climbing harness, the posted announcement states.

It says no U.S. fall injuries involving one of the lanyards have been reported, but one fall injury in France has been. Consumers should stop using them immediately; CPSC notes that it is illegal to resell or attempt to resell a recalled consumer product.

The lanyards were made in France. All Scorpio and Absorbica lanyards manufactured before May 2011 are included. Scorpio lanyards manufactured between 2002 and 2005 with model numbers L60 and L60 CK, which are yellow and blue, Y-shaped lanyards with yellow stitching on both ends, connected by a metal O-ring to one end of a blue pouch containing the tear-webbing shock absorber, are included. The pouch has a tag on it with the word "PETZL" in white letters, and the other end of the blue pouch has a blue and yellow webbing attachment loop that connects to the climbing harness. Scorpio lanyards manufactured between 2005 and 2011 are model numbers L60 2, L60 2CK, L60 H, and L60 WL. They are red, Y-shaped lanyards connected by a black metal O-ring to one end of a grey zippered pouch containing the tear-webbing shock absorber. The other end of the pouch has a black webbing attachment loop that connects to the climber's harness. Absorbica lanyards included in the recall have model numbers L70150 I, L70150 IM, L70150 Y, L70150 YM, L57, L58, L58 MGO, L59, and L59 MGO. They have a black zippered pouch with yellow trim and the Petzl logo on the side and a tear-webbing shock absorber accessible through the zippered pouch. The pouch has a connector attachment on one end and a connector attachment, a single lanyard, or a Y-shaped lanyard on the other end. Authorized Petzl dealers in the United States and Canada sold them from January 2002 through May 2011 for \$75 to \$220, the notice states.

For a free inspection and replacement of any non-conforming product, contact Petzl America Inc. at 877-740-3826 between 8 a.m. and 5 p.m. Mountain Time weekdays or visit www.petzl.com.



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Safety Alert 2011- 01

Location: WA Trucking (Longview TBLDS) – WA Trucking Pe ELL

Date of incident: May 31, 2011

Task/Area: Truck Driver

Nature of injury: No Injuries - DOT

A loaded company log truck was traveling south on a straight stretch of the Wildwood Road. The driver took his eyes off the road for a second and did not notice the truck had started heading off the right shoulder of the road. When the driver realized the truck was headed off the road, his action was to correct the wheels to the left back onto the road. The driver overcorrected and the truck flipped onto its side into the ditch. The width of the road at the scene of the accident measures 10 feet from the yellow line to the white line with about 18 inches of shoulder. The ditch at the scene is about 4 feet deep and drops sharply from the roadway. The tractor rolled onto the passenger's side, but the trailer remained upright, losing the load of logs. Fortunately, the driver was wearing his seat belt and was not injured.



Caution : Keep Your Eyes on the Road—at all times! Driver's familiarity with stretches of road they have traveled on frequently can lead to complacency and inattention, it's never safe to take your eyes off the road while driving...no matter how well you know the road.

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Safety Alert

08/17/11

Re: Hoist Near Miss Incident.

INCIDENT:

While lifting the Sheeter blade assembly, the monorail hoist suddenly dropped and shifted partially off the rails (photos 1 and 2). Investigation revealed that the control pendant's stress-relief chain had lodged inside of the hook block sprocket. Disassembly of the sprocket and inspection of the area revealed that the stress relief chain had wedged inside the workings of the sprocket (photo 3), causing the incoming chain to slack and then reload. This in turn dropped and shock loaded the unit. The shock load caused the hoist to shift partially off the overhead rail.



Photo 1: Photo shows unit after dropping. The pendant chain can be seen to enter the hook block sprocket.

Photo 2: Close up, showing the pendant chain entering the hook block sprocket.

STRAIN RELIEF



Photo 3: Stress relief chain wedged inside the disassembled hook block sprocket.



RESPONSE:

In response to this incident, the stress-relief chain was replaced with 1/4" coated aircraft cable that cannot enter into the sprocket. In addition, operations personnel were provided refresher training on signs of hoist malfunction, and proper responses. In consideration of this incident, operating areas must review their cranes and hoists for similar control pendant stress-relief chains and, where said chains can enter block sprockets, replace those chains with proper cable.



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The Legal Corner

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Host Employer OSH Act Liability at Multi-Employer Worksites

It is clear that OSHA has shifted to a more aggressive approach to enforcement. In addressing the alleged OSHA violations of a primary contractor or subcontractor at a multi-employer worksite, it appears that OSHA plans to increase the number of citations issued to the host employer or general contractor under OSHA's Multi-Employer Worksite Citation Policy (MEWCP). Under the MEWCP, OSHA and its state counterparts identify four categories of employers that **may** have liability under the OSH Act and its state counterparts for a non-compliant, hazardous condition. The four categories of employers are: (1) the employer who created the hazardous condition ("the creating employer"); (2) an employer whose employees are exposed to the hazardous condition ("the exposing employer"); (3) the employer who is responsible (generally by contract) for correcting the hazardous condition ("the correcting employer"); and (4) the employer who has general supervisory authority over the worksite, including the power to correct safety and health violations or require others to correct them ("the controlling employer").

OSHA's theory is that where an employer could reasonably be expected to prevent or detect and abate the violations of other employers due to its supervisory authority and control over the worksite, it will, as the "controlling employer," be jointly liable for those violations. Control can be established by contract or, in the absence of explicit contractual provisions, by the exercise of control in practice. At an industrial site, MEWCP citations are likely to be issued when employees of an independent contractor performing either maintenance or construction activities at the host employer's facility are exposed to, and generally injured by, a violative condition in the course of their work and OSHA determines that the host employer or general contractor bears some of the responsibility for the violative condition.

The goal shared by all parties is to prevent serious workplace injuries and illnesses in the most cost-effective manner. The primary concern raised by the application of the MEWCP is that, if literally interpreted, it appears designed to impose OSH Act liability on the host employer in a broad variety of situations where, even if exposure to the hazard resulted in an injury to the contractor's employee, tort law would not impose liability on the host employer.

Here is where the situation becomes complicated. If viewed as independent risks, it appears that, in a significant number of cases, the risk management measures that a host employer would take to minimize tort liability are different than, and would conflict with, the measures a host employer would take to minimize OSH Act liability under the MEWCP as stated above.

Based on workplace safety and tort law considerations, we believe prudent host employers have attempted, to the extent practical, to retain sufficient control over the workplace to allow them to reduce the risk of serious injury to any employee, without asserting control over the means and methods of the contractor's performance. In general, under tort law, a host employer or general contractor is not liable for a workplace injury to an employee of an independent contractor resulting from a hazard created by the work activities of the independent contractor except where the host employer or general contractor has the right to control the means and methods of the independent contractor's work. A general right of a host employer or general contractor to ensure that safety precautions are observed and that work is done in safe manner, and even to stop work it deems unsafe, generally is not viewed as control over the means and methods of the independent contractor's work, but it is unclear whether it would be viewed as adequate control to establish liability under the OSH Act.

Some commentators have suggested the emergence of the MEWCP in general industry calls for a dramatic, if not radical, change in the way host employers approach the management of outside contractors. While this development

raises concerns, and suggests a review of current practices and monitoring of OSHA enforcement activity, it does not appear that it would justify a wholesale change in strategy at this time.

Following are three different situations in which the application of the MEWCP has been approved or rejected by the OSH Review Commission or the courts.

- **Secretary of Labor v. Summit Contractors, OSHRC Docket No. 05-0839, August 19, 2010.**
http://www.oshrc.gov/decisions/html_2010/05-0839.htm

Summit, the general contractor for a construction project, rented and provided a subcontractor (“Subcontractor”) with two pieces of temporary electrical services equipment that Subcontractor needed to perform its work—a portable electric generator and a “spider box” (a piece of electrical equipment containing multiple receptacles into which portable tools can be plugged). Summit did not ask the rental company (“Rental Company”) to supply equipment with GFCI protection, and did not inspect the equipment for GFCI protection when Rental Company delivered it to the worksite.

During an OSHA inspection, the compliance officer (“CO”) determined that neither the generator nor the spider box were equipped with the required ground-fault protection. Summit immediately contacted Rental Company to obtain replacement equipment with ground fault protection. Following the inspection, OSHA issued a citation to Summit, as both the creating employer and the controlling employer under the MEWCP, alleging a serious violation of Section 1926.404(b)(1)(ii) for its failure to provide ground fault protection on either of the two pieces of equipment.

The Review Commission held that Summit’s superintendent exercised overall authority regarding safety-related matters at the worksite based on the following: (1) he observed the progress of the project and worksite conditions by walking the worksite twice each day; and (2) Summit directed him to point out obvious hazards to the subcontractors, which he accomplished at weekly meetings with the foremen by identifying such safety issues as hard hats, safety glasses, and damaged electrical cords.

With respect to the cited condition in particular, the Review Commission noted the following: (1) Summit provided the equipment and could have prevented the hazardous condition from occurring in the first place by ordering GFCI-protected equipment; (2) Summit contacted the Rental Company to resolve the Subcontractor’s initial inability to start the generator; and (3) Summit obtained the replacement equipment that complied with OSHA’s ground fault protection requirements. Under these circumstances, the Review Commission stated: “we find Summit’s control over the worksite as a whole, in conjunction with its control over the cited condition, sufficient to establish it was a controlling employer” as well as the creating employer. The legal principle relied upon by the Review Commission was stated as follows:

“[A]n employer who either creates or controls the cited hazard has a duty under § 5(a)(2) of the Act . . . to protect not only its own employees, but those of other employees engaged in the common undertaking.” [Citations omitted]. With respect to controlling employer liability, ‘an employer may be held responsible for the violations of other employers ‘where it could reasonably be expected to prevent or detect and abate the violations due to its supervisory authority and control over the worksite.’ [Citations omitted].

Having undertaken the obligation to provide electrical services, it is likely that Summit had a duty of care under tort law to provide the appropriate and legally required ground fault protection¹. Had Summit not been involved in the acquisition of the non-compliant electrical equipment, it would not have been the creating employer and it is highly questionable as to whether it would have been appropriate to characterize Summit as a controlling employer.

- **Occupational Safety & Health Review Commission: *Ryder Transportation Services*, Docket No. 10-0551 (Feb. 28, 2011); related case is *M.C. Dean, Inc.*, Docket No. 10-0549 (May 16, 2011)**

Ryder Transportation Services (“Host Employer”) contracted with M.C. Dean (“Electrical Contractor”) to service existing roof-mounted exhaust fans at one of Host Employer’s warehouses. The roof of the warehouse had approximately eight or ten skylights that were 3 feet wide, 10 to 12 feet long, and spaced approximately 25 feet apart and “a similar distance from the exhaust fans.”

¹ We are assuming that Summit did not expect Framing Subcontractor to institute an assured equipment grounding conductor program.

The skylights were obvious to someone inside the warehouse, but not to someone standing on the roof. According to testimony credited to the Electrical Contractor's foreman: "They [the skylights] were the same pattern as the roof metal and they were actually the same color as the roof metal." In other words, one might arguably describe them as camouflaged while standing on the roof.

After attempting unsuccessfully to fix the two malfunctioning exhaust fans, the Electrical Contractor employees determined that they needed to access the warehouse roof, and received permission to do so from Host Employer's lead man at the site. Host Employer had previously classified the roof as a restricted area, forbidding its employees to access it. An hourly Electrical Contractor employee, designated to serve as the Electrical Contractor "field supervisor" at the site, and a second Electrical Contractor employee, used a lift to raise a third Electrical Contractor employee to the roof. That employee climbed out of the lift, walked across the roof (without incident) to check the fans, and apparently fell through an unguarded roof skylight on his return trip to the lift. He died from his injuries two weeks later.

OSHA rule 1910.23(a)(4) provides that "every skylight floor opening and hole shall be guarded by a standard skylight screen or a fixed standard railing on all exposed sides." Asserting that the skylights were not guarded as required by existing rules, OSHA issued citations to both Electrical Contractor (as the exposing employer) and Host Employer (as the controlling employer) for exposing Electrical Contractor's employee to the unguarded skylight. Both employers contested the citations before the Review Commission and they were heard in separate proceedings before different administrative law judges (ALJs). The citation against Electrical Contractor was upheld; the citation against Host Employer was vacated.

In the Electrical Contractor case, the critical issue was whether Electrical Contractor, as the cited employer, had actual or constructive knowledge of the violative condition. The ALJ found: (1) that the existence of the skylights was readily apparent from the ground, although not from the roof; (2) that Electrical Contractor's "field supervisor" had failed to exercise reasonable diligence when he failed to investigate conditions on the roof; and (3) that his knowledge was properly imputed to Electrical Contractor. On that basis, the ALJ held there was employer knowledge of the violative condition and upheld the citation.

In the Host Employer case, the issues were: (1) whether Host Employer was a controlling employer under the MEWCP; (2) whether host employer had actual or constructive knowledge of the violative condition; and (3) whether Electrical Contractor's employees were exposed to the violative condition. Addressing the exposure issue, the ALJ stated that the "tragic death is proof of [employee] exposure to the unguarded skylight." The ALJ found that Host Employer was a controlling employer with respect to the violative condition because Host Employer was responsible for maintenance of the roof and only Host Employer had the authority to (permanently) abate the condition.

Regarding the knowledge issue, the ALJ found that Host Employer knew that an Electrical Contractor employee was going onto a roof with unguarded skylights, but held Host Employer did not have knowledge of the violative condition, which the ALJ appears to have defined as a reasonable expectation that an employee would come within 6 feet of the unguarded skylight. The ALJ explained that it was possible to access the fans from the roof without coming within 6 feet of the unguarded skylights. Based on that analysis, the ALJ held that the citation was invalid. The case was directed for review by the Review Commission to re-examine the analysis of the employee exposure and employer knowledge issues.

Host employers should conduct a common-sense job hazard analysis and risk assessment based on the work expected to be performed at their facilities and either eliminate/control or make the contractor aware of any significant non-obvious hazards. For example, experience indicates that, while the frequency may be low, roofs will need to be accessed to maintain the roof and any roof-mounted equipment. Therefore, rather than classifying a roof as a prohibited area, and assuming that message and the underlying rationale will be effectively communicated to everyone who might access it, the prudent course of action would seem to be to guard or eliminate the roof skylights. This would be particularly important if, when standing on the roof, the skylights are not readily distinguished from the rest of the roof.

- ***IBP, Inc. v. Herman*, 144 F.3d 861, 865 (D.C.Cir.1998)**

IBP, which operated a meat processing plant, hired an independent contractor ("Cleaning Contractor") to clean and sanitize the plant's processing machinery after the close of production each day. Three Company employees, a product control manager and two inspectors, remained in the plant during the sanitation process. According to the contract between

IBP and Cleaning Contractor, IBP could “tag” areas that did not meet its sanitation standards and Cleaning Contractor would have to re-clean them.

OSHA’s lockout-tagout (LOTO) standard generally required the Cleaning Contractor to lock out the pieces of equipment to be cleaned and sanitized before beginning the cleaning and sanitizing operation. All of IBP’s machines were capable of being locked out, and Cleaning Contractor employees were trained in the proper LOTO procedures. There was a significant lack of compliance with OSHA’s LOTO standard by the Cleaning Contractor, which eventually resulted in the death of an employee of the Cleaning Contractor.

During the course of their quality control inspections, IBP employees often saw Cleaning Contractor employees violating lockout procedures. IBP employees often motioned to Cleaning Contractor employees to stop dangerous conduct, but Cleaning Contractor employees often ignored those suggestions.

One clause in the contract between IBP and the Cleaning Contractor provided that IBP may terminate the agreement without penalty upon not less than one week’s notice to Cleaning Contractor if (1) Cleaning Contractor violates IBP’s Contractor Safety Policy, (2) Cleaning Contractor is cited for a repeat violation by OSHA or the State equivalent agency, or (3) Contractor’s operations result in a death or amputation injury. In a second contract clause, IBP reserved the right, in its “sole discretion,” to bar any Cleaning Contractor employee from the IBP plant.

The contract stated that the “Contractor shall furnish *the sole supervision and control* of such labor as is necessary to perform this Agreement.” (Emphasis added.) It also required Cleaning Contractor to assume the responsibility for complying with OSHA standards and IBP’s lockout policy.

The Review Commission held that the contract termination clause made IBP a “controlling employer” and liable for failure of the Cleaning Contractor employees to apply lockout because it concluded IBP could have used the contract termination clause to pressure Cleaning Contractor to enforce the OSHA lockout requirements. On appeal, the D.C. Circuit rejected that analysis, holding that the right to terminate a contract is not equivalent to the right to control the work being performed. The court stated that IBP pointed out the safety violations to the Cleaning Contractor’s supervisors and management, which is the most it could be expected to do. The court found that the contract, and its implementation by IBP “reflected [IBP’s] disavowal of micromanagement,” and held, under those circumstances, that IBP’s right to bar a particular employee from the site did not make IBP a “controlling employer.”

Conclusion

In short, the determination as to whether an employer at a multi-employer worksite will be liable under the OSH Act, as a “creating employer” or “correcting employer” under the MEWCP, for the violations of other employers, is likely to be fairly straightforward. The determination as to whether an employer will have OSH Act liability as a “controlling employer” is heavily dependent on both the language of the contract and the pattern of conduct established by the parties in implementing the contract. ***IBP, Inc. v. Herman*** indicates that OSHA will not be permitted to impose liability on a host employer simply because it is the host employer and, as the host employer, has the ability to terminate contracts and limit access to its site. Rather than interpreting OSHA’s position in this area as one seeking to dramatically expand host employer liability, **it appears that OSHA is, at least for the time being, seeking to impose OSH Act liability on host employers in situations where tort liability would also be imposed on the host employer in the event of an injury to a contractor employee.** However, this is an area of OSHA enforcement that bears careful monitoring for any signal of a shift toward an enforcement policy that would impose OSH Act liability on the host employer in situations where, even if exposure to the hazard resulted in an injury to the contractor’s employee, tort law would not impose liability on the host employer.

Eye on Ergonomics

Machine Operator ... Warm-Up, Stretch & Strengthen

Note: Check with your physician if you have any past or present injuries to the back before performing these exercises. If discomfort is felt during or after any of these exercises, see your physician for more guidance or modifications before continuing.

As a warm-up, hold each stretch, both sides, for up to 5 seconds.

Stretches

To lengthen tissue, hold each stretch, both sides, for at least 20 seconds.

Strengthening Exercises

Interrupt long periods of sitting (e.g. at least every hour) with stretches to move the back in the opposite direction and to warm-up the hips.

Warm-Ups

Alternate 1 with 2, 3 and 4 for at least one cycle.



1



2



3



4

Stretches



1



2



3



4

Shoulder & Chest

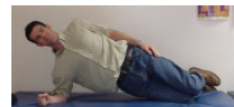
Alternate 5 and 6.



5



6



a



b



c

To strengthen some of the key torso stabilizers, perform these exercises in sequence. It is recommended to start with the series above alternating between the three positions every 10 sec for 70 seconds (a-b-c-b-a-b-c). Once you can comfortably complete two cycles, graduate to the lower series.



a



b



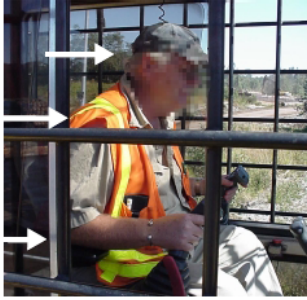
c

Machine Operator ... Stretch Break

Note: Check with your physician if you have any past or present injuries to the back before performing these exercises. If discomfort is felt during or after any of these exercises, see your physician for more guidance or modifications before continuing.

Posture

Ensure you do not slouch in the seat with your head and shoulders forward or your low back away from the seat.



To minimize the negative effects of sitting ... sit tall with your low back and shoulders against the seat.



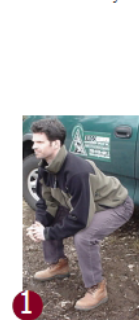
As a warm-up, hold each stretch, both sides, for up to 5 seconds.

Stretches

To lengthen tissue, hold each stretch, both sides, for at least 20 seconds.

Warm-Ups

Interrupt long periods of sitting (e.g. at least every hour) with stretches to move the back in the opposite direction and to warm-up the hips. Perform these stretches on the ground or deck of the machine.



1



2



3



4

Stretches



1



2



3



4

Shoulder & Chest

Alternate 5 and 6.



5



6

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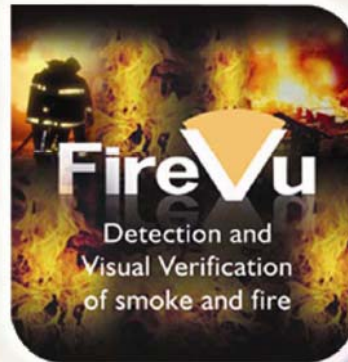
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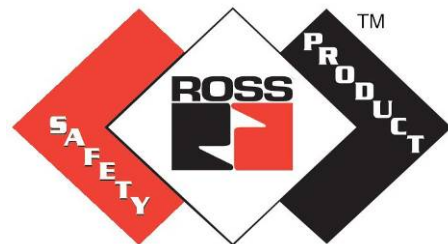
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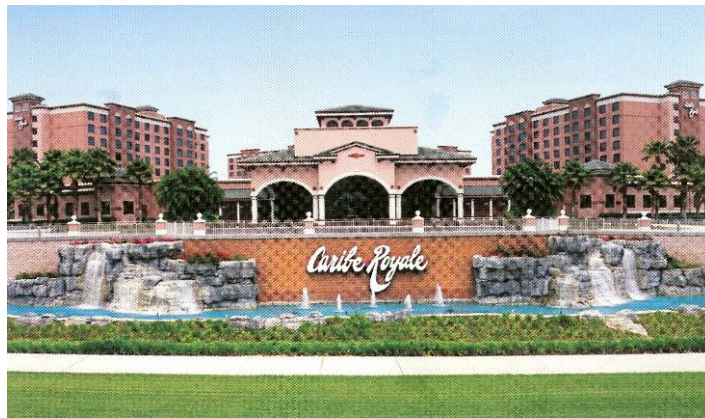
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