Health, Safety and Environmental Management

Management Program, A List of Possible Hazards Found at School District Sites

This document does not establish what is fundable under Health and Safety (H&S) per Minnesota Statutes, section 123B.57 Subdivision 6. Please see the Long-Term Facilities Maintenance (LTFM) Revenue - Guide for Allowable Expenditures for this purpose. The purpose of this document is to suggest what a district should consider including as it establishes its H&S program and plans. A district's cost to provide program management services is an allowable H&S expenditure. A district may fund activities of H&S committees to identify safety hazards, prioritize and schedule their abatement. Costs to support A Workplace Accident and Injury Reduction (AWAIR) Safety Committees, including hourly wages of employees and substitutes, but not benefits, is allowable. A district's management program may be accomplished with its own personnel, through contracted services or a combination of the two. Where the district's own personnel provide this function, a separate accounting of personnel time and activity charged to a finance code must be maintained, so the expenditures can be audited if requested. Estimates must be identified as clock hours, not percentages of time or other means.

For districts with LTFM revenue calculated using hold harmless provisions the biennial cap on Finance Code (FIN) 352 expenditures remains in effect for the "old law" funding formula, per Minnesota Statutes 2014, section 123B.57 Subdivision 8. This results from a revenue calculation using alternative (2) in Minnesota Statutes, section 123B.595 Subdivision 1, stated: or (2) the sum of the amount the district would have qualified for under Minnesota Statutes 2014, section 123B.57, Minnesota Statutes 2014, section 123B.59, and Minnesota Statutes 2014, section 123B.591. For the Fiscal Year (FY) 2016-17 biennium, school years 2015-16 and 2016-17, the maximum revenue for Health, Safety and Environmental Management (FIN 352) costs was established in January 2014 at the greater of $31.51 per FY 2013 Adjusted Marginal Cost Pupil Units (AMCPU) or an amount equal to $0.40 times the first 50,000 square feet plus $0.208 times the remaining square feet, based on 2014 facilities age and square footage data. The FIN 352 maximum for the FY 2016-2017 biennium is available as advice on the website. The maximum amounts for FY 2018 and FY 2019 were established with 2016 facility age and square footage and FY 2015 Adjusted Pupil Units (APU) data and conversion to $33.28 per APU from $31.51 per AMCPU. To calculate the district's FY 2018 cap, **review the FY 2018-2019 biennial cap amount labeled as advice on the website** and subtract the lesser of the sum of all approved FIN 352 projects for FY 2018 or the amount reported on UFARS for FY 2018. The difference is the FY 2019 cap amount.

Example 1: For the FY 2016 and FY 2017 biennium, Independent School District (ISD) 999 has 1,200 AMCPUs and 195,000 square feet, so comparing its maximum amount by student count ($37,812) and by square feet ($50,160) establishes its absolute FIN 352 max at $50,160 over the biennium. It can spend half in each year, or 60/40 or 65/35 percent, as it chooses. Whatever isn't spent in the first year is available in the second, but no more.

Example 2: ISD 888 has 1,200 AMCPUs and 120,000 square feet, so its amounts of $37,812 and $34,560 favor AMCPU amount over square feet. As before, district requests for Health,

Safety and Environmental Management (HSEM) revenue in excess of these limits will result in a "negative adjustment" project generated by the Minnesota Department of Education (MDE), which will reduce the total FIN 352 approved amount to a maximum. FY 2016, the negative adjustment is imposed if the district request exceeds the biennium maximum amount. For FY 2017, the negative adjustment is imposed if the district request exceeds the remaining allowed maximum amount.

Asbestos

- Develop and implement an Asbestos Hazard Emergency Response Act (AHERA) written management plan encompassing 40 Code of Federal Regulation (C.F.R.) Part 763, Subpart E.
- Identify current Designated Person (DP); ensure designated person is AHERA trained.
- If the DP is not a district employee, identify a local contact person representing school.
- Review and update existing asbestos management plan. See the U.S. Environmental Protection Agency (EPA) website (http://www.epa.gov/asbestos/pubs/asbestos_in_schools.html) to read a Model AHERA Asbestos Management Plan (http://www.epa.gov/asbestos/pubs/modelamp.pdf).
- Develop and disseminate annual written notification.
- Provide 14-hour maintenance/custodial Operations and Maintenance (O&M) training.
- Provide two-hour Asbestos awareness training, necessary for all maintenance/custodial persons.
- Perform three year re-inspections.
- Provide six-month periodic surveillance of Asbestos Containing Materials (ACM).
- Maintain and update ACM inventories.
- Maintain all records of asbestos events, per Occupational Safety and Health Administration (OSHA) and AHERA.
- Establish a respiratory protection program that includes medical monitoring, fit-testing, proper selection and use, and on-going program evaluation.
- Establish a general work order system and asbestos work order system.
- Establish work practice standard operating procedures.
- Establish emergency response procedures.
- Schedule response action implementation.
- Provide liaison with project designer for asbestos abatement projects.
- Provide and post hazardous warning labels in routine maintenance areas.

- Review program and obtain school board approval at least annually.

Accident and Injury Reduction Program: Model AWAIR Program for Minnesota Schools.

- Develop and implement a written management plan, based on established goals, encompassing Minnesota Statutes section 182.653, Subdivision 8 for an AWAIR work place program.
- Develop procedures that outline how managers, supervisors and employees are responsible for implementing the written program and how continued participation of management will be established, measured, and maintained.
- Identify school district contact person(s) for accident and injury reduction program.
- Review written plan as needed, and update (at least annually).
- Develop and implement a written plan for OSHA-mandated safety committees.
- Conduct safety committee meetings, at least quarterly, to identify and eliminate workplace safety hazards. Develop and document methods used to identify, analyze, and control new or existing hazards.
- Identify and document methods of how the plan will be communicated to all affected employees so that they are informed of work-related hazards and controls.
- Develop and document procedures for investigation of work place accidents and corrective action.
- Develop and document procedures that outline how safe work practices and rules will be enforced.
- Review program and obtain school board approval at least annually.

Bloodborne Pathogen Standard – Exposure Control Plan

- Develop and implement a bloodborne pathogen-exposure control plan encompassing OSHA standard 29 C.F.R .1910.1030.
- Identify school district contact person(s) as the exposure control officer(s).
- Review written plan as needed, and update with input from employees with contaminated sharps exposure on the identification, evaluation, and selection of effective engineering and work practice controls (at least annually).
- Survey the facility to identify job categories in which employees may be at risk to exposure (exposure control plan exposure determination) and the tasks and procedures in which occupational exposure occurs. Document this process.
- Provide Hepatitis B vaccinations to eligible employees that have an anticipated risk of exposure, not all school employees.

- Train affected employees on proper specific and universal precaution methods and techniques.
- Determine valid exposure incidents and investigate the incident, following criteria in Minnesota Statutes, section 182.6555. Record and report on First Report of Injury for proper insurance treatment.
- Maintain a sharps injury log that retains confidentiality of the injured employee.
- Respond to regulatory agency correspondence, guidelines and recommendations, especially Center for Disease Control (CDC) guidelines.
- Monitor or provide updates on regulatory changes and new developments.
- Review program and obtain school board approval at least annually.
- For employees identified because they are first-aid responders, ensure these individuals are provided first-aid training (Red Cross training recommended).
- Develop and implement program to provide exposure control kits (e.g., gloves, masks, gowns). Kits are eligible for H&S funding, but as a separate project.
- Pre- or post-exposure evaluation is an approved expenditure under H&S, to the extent of determining if a person is or is not infected, and the type of the disease(s) (e.g., Human Immunodeficiency Virus (HIV), Hepatitis B Virus (HBV) and Hepatitis C Virus (HCV)).

Community Right To Know

- Develop and implement a written management plan for Community Right To Know (CRTK).
- Identify school district contact person(s) for community right-to-know.
- Review written plan as needed, and update (at least annually).
- Survey facility for hazardous materials in reportable quantities.
- Develop and maintain hazardous materials collection and storage procedures.
- Review invoices of CRTK-reportable materials for quantity verification.
- Initiate in-house reporting procedure(s).
- Prepare notification correspondence/reports to state emergency response commission and local emergency planning committee (frequently the district's local fire department).
- Train affected employees. Provide annual training.
- Develop and implement CRTK-recordkeeping procedures.
- Respond to regulatory agency correspondence, guidelines and recommendations (i.e., Minnesota Emergency Response Commission).

- Provide updates on regulatory changes and new developments.
- Review program and obtain school board approval at least annually.

Compressed Gas

- Develop a written compressed gas plan encompassing OSHA standard 29 C.F.R., section 1910.101.
- Identify school district contact person(s) for compressed gas.
- Review written plan as needed, and update (at least annually).
- Survey the facility to determine compressed gas applications.
- Review current compressed gas safety procedures.
- Identify compressed gas toxic and physical hazards.
- Evaluate compressed gas application to determine if confined space rules apply.
- Determine need for metering equipment/supplies (i.e., CO, CO2, O2, SO2, and H2S).
- Train affected employees on proper compressed gas methods and techniques.
- Monitor compressed gas record-keeping procedures.
- Respond to regulatory agency correspondence, guidelines and recommendations.
- Monitor or provide updates on regulatory changes and new developments.
- Review program and obtain school board approval at least annually.

Confined Space Standard

- Develop and implement a written management plan for confined spaces encompassing OSHA standard 29 C.F.R., section 1910.146.
- Identify school district contact person(s) for confined spaces.
- Review written plan as needed, and update (at least annually).
- Identify confined space entry hazards. Survey the facility to determine all permit and non-permit confined spaces.
- Review current Confined Space Entry Procedures (CSEP).
- Use the entry permit to establish entry requirements including: proper ventilation, communication, personal protective and gas testing equipment, as needed (identify equipment as separate H&S projects).
- Train affected employees on proper confined space entry methods and techniques.

- Develop and maintain confined spaces record-keeping procedures. Entry permits need to be retained for a year and reviewed. The review will determine the necessity to modify entry procedures based on conditions of the confined space.
- Low hazard spaces may allow for alternative procedures that don't require a permit or re-classification from a permit to a non-permit confined space.
- Evaluate confined space record-keeping products and procedures.
- Respond to regulatory agency correspondence, guidelines and recommendations.
- Monitor or provide updates on regulatory changes and new developments.
- Review program and obtain school board approval at least annually.

Electrical Safety

- Develop and implement a written management plan for electrical safety encompassing OSHA standard 29 C.F.R, sections 1910.301-.308 and 1910.331-.335.
- Develop standard operating procedures to detect and de-energize (or otherwise guard) live electrical equipment before work is performed. Working on any live electrical should be avoided.
- Identify a responsible district contact person.
- Provide annual training to affected employees.
- Identify and implement safe work practices.
- Provide adequate personal protective equipment (contact OSHA for more information).
- Maintain applicable recordkeeping.
- Provide a written program review, and update (at least annually).

Emergency Action Plan

- Develop and implement written management plans for each school for each type of emergency: fire, utility disaster and natural disaster. Violence prevention planning is not supported under H&S, per Minnesota Statutes, section 123B.57 Subdivision 6a (5).
- Identify school district contact person(s) for each emergency plan.
- Survey the facility to determine the facility's ability to provide safe egress or safe shelter.
- Develop emergency action plan procedures and routes per OSHA standard 29 C.F.R., section 1910.38.
- Post evacuation or shelter routes and locations, in each classroom, office or assembly area. Route(s) should be shown drawn on 8 x 11 scale building map, preferably color-coded.

- Train affected employees.
- Review written plan as needed, and update (at least annually).
- Develop and implement written record-keeping procedures.
- Respond to regulatory agency correspondence, guidelines and recommendations.
- "Cooperate with local government authorities to ensure the preparation of plans for the protection of students in an emergency. These plans should include sheltering students in schools, or evacuating them to their homes, as well as using the schools as congregate care centers in support of emergency operations" -Minnesota Executive Order 93-27.
- Review program and obtain school board approval at least annually.

Employee Right-to-Know – Hazard Communication

- Develop and implement a written management plan for Minnesota ERTK, in compliance with OSHA standard 29 C.F.R., section 1910.1200, and Minnesota Rules 5206.
- Minnesota has adopted the revised Hazardous Communication (HazCom) standard that will be enforced by June 1, 2016.
- Identify school district contact person(s) for ERTK.
- Review written plan as needed, and update (at least annually).
- Identify hazard communications functional areas (e.g., kitchen, shops, art, maintenance).
- Survey the facility to identify chemical, heat, noise, radiation and infectious agents hazards. Review at least annually.
- Safety Data Sheet (SDS) acquisition, compilation and distribution. Ideally, SDS would be available in each affected department. The new global harmonizing system labeling requirements must be complied with by June 1, 2015.
- Perform chemical inventory. Update at least annually. Ideally, chemical inventory would be available with SDSs in each affected department.
- Monitor use and labeling on Secondary Use Containers.
- Review and update current ERTK standard operating procedures.
- Perform initial and annual functional area training. As part of the transition to the revised HazCom standard, training must be provided to employees on the new global harmonizing system labeling and safety data sheet format by December 1, 2013.
- Minnesota ERTK will retain requirements for harmful physical and infectious agents, and the need for annual training. View more information on the revised standard and Globally

Harmonized System of Classification and Labeling of Chemicals (GHS) system requirements. (http://www.osha.gov/dsg/hazcom/index.html)

- Provide all record-keeping activities and procedures.
- Respond to regulatory agency correspondence, guidelines and recommendations.
- Monitor or provide updates on regulatory changes and new developments.
- Review program and obtain school board approval at least annually.

First Aid/CPR/AED

- Develop and implement a written management plan for First Aid/ Cardiopulmonary Resuscitation (CPR)/ Automated External Defibrillator (AED).
- Identify school district contact person(s) for First Aid/ CPR/AED. Contracting for services is not fundable.
- Determine time for arrival of first aid providers (outside and in-house). Per OSHA Compliance (CPL) 02-02-053, first aid must be available within eight minutes from any site, including travel time.
- Review written plan as needed, and update (at least annually).
- Survey facility for First Aid/CPR/AED needs.
- Provide First Aid/CPR/AED training as required.
- Develop and implement program to provide emergency first-aid kits. Kits and replacement supplies for the emergency kits are eligible for H&S funding, but not first-aid medical supplies in general.
- Review program and obtain school board approval at least annually.

Food Safety Inspection-Certification

- Develop policies and procedures to support the Minnesota Food Code rule.
- Identify school district contact person (certified food manager) who demonstrates knowledge of the Minnesota Food Code.
- Review updates on regulatory standards and reporting requirements.
- Identify critical areas and use a systems approach with Hazardous Analysis Critical Control Points (HACCP).
- Respond to regulatory agency correspondence.
- Provide annual training.

- Review program and obtain school board approval at least annually, per Minnesota Statutes, section 123B.57.

Forklift Safety

- Develop and implement a written plan for forklift safety encompassing OSHA Standard 29 C.F.R., section 1910.178.
- Identify contact person.
- Maintain inventory of forklifts.
- Identify employees who operate forklifts and provide required training. Include assessment of forklift operator performance at least every 3 years. Specific criteria will require refresher training.
- Ensure safe changing and charging battery procedures for electric forklifts (1910.178(g)).
- Conduct carbon monoxide monitoring (Minn. R. 5205.0116) in space and tailpipe emissions for non-battery-operated forklifts.
- Inspect forklifts daily or prior to each work shift and provide all required safety equipment. View sample checklists (http://www.osha.gov/SLTC/poweredindustrialtrucks/standards.html)
- Detach propane tanks and provide storage outside occupied areas.

Hazardous Waste

- Develop and implement a written management plan for hazardous waste. These are defined as wastes, which are toxic, combustible, corrosive or reactive.
- Identify school district contact person(s) for hazardous waste.
- Review written plan as needed, and update (at least annually).
- Identify facility hazardous waste streams by functional areas and by waste stream types.
- Examine facility hazardous waste product generation potential.
- Identify actions that minimize or eliminate hazardous waste generation.
- Develop containerization and labeling procedures.
- Review current handling and storage procedures.
- Implement proper waste disposal procedures. Complete disposal manifests.
- Acquire Environmental Protection Agency (EPA) generator number and Minnesota Pollution Control Agency (MPCA) annual permit for each building generating hazardous waste.

- Train affected employees. Provide annual training according to Very Small Quantity Generator (VSQG) or Small Quantity Generator (SQG) criteria.
- Monitor or provide updates on regulatory changes and new developments. Review updates on regulatory standards, reporting requirements and new developments.
- Develop and implement written record-keeping procedures – maintain all compliance documentation.
- Evaluate boiler and other stack emissions to air with respect to current MPCA stack emissions standards.
- Review program and obtain school board approval at least annually.

Hearing Conservation

- Develop and implement a written management plan for hearing conservation encompassing OSHA Standard 29 C.F.R., section 1910.95.
- Identify school district contact person(s) for hearing conservation.
- Review written plan as needed, and update (at least annually).
- Identify hearing conservation hazards. Survey the facility to determine all noise hazards.
- Develop, implement and monitor good hearing conservation practices and procedures.
- Train affected employees on proper hearing conservation methods and techniques.
- Provide audiometric testing for employees with noise exposure over an eight-hour time-weighted average of 85 decibels (dB) or more.
- Respond to regulatory agency correspondence, guidelines and recommendations.
- Monitor or provide updates on regulatory changes and new developments.
- Review program and obtain school board approval at least annually.

Hoist/Lift

- Develop and implement a written plan for a hoist/lift encompassing Minnesota Rule 5205.1200 for hoists rated one-ton or less.
- Identify contact person.
- Maintain inventory of hoists rated one ton or less and backhoes.
- Inspect and document inspection on listed equipment initially for compliance with the regulation.
- Follow OSHA requirements and manufacturer guidelines to conduct daily to monthly inspections (depending on use).

- Ensure safety latches are provided on all hoist hooks used on hoist.
- Provide training to employees.
- Record-keeping.
- Collect annual review.

Indoor Air Quality (IAQ)

- Develop and implement a written management IAQ, encompassing the U.S. EPA "Tools for Schools." See the Minnesota Department of Health Indoor Air Quality in Schools (http://www.health.state.mn.us/divs/eh/indoorair/schools/index.html) for a model Indoor Air Quality Management Plan (http://www.health.state.mn.us/divs/eh/indoorair/schools/plan/index.html)
- Identify a school district IAQ coordinator for indoor air quality.
- Conduct and document an annual building walkthrough.
- Conduct and document an annual ventilation and building checklist.
- Monitor plan implementation including documenting situations and work practices that require indoor air quality remediation.
- Inform and educate staff about indoor air quality procedures and policies.
- Develop a communication plan/policy to include response to building complaints.
- Respond to regulatory agency correspondence, guidelines and recommendations.
- Monitor regulatory changes and new developments.
- Review program and obtain school board approval at least annually.

Infectious Waste (Exclusive of Bloodborne Pathogens, if any)

- Develop and implement a written management plans for infectious waste, if any (**Note**: blood or other potentially infectious materials are covered under Bloodborne Pathogen Standard)
- Identify school district contact person(s) for infectious waste management.
- Identify sources of infectious waste in each facility.
- Review current infectious waste handling procedures.
- Review current internal traffic procedures.
- Review current external transportation/disposal of infectious waste.
- Evaluate current infectious waste record-keeping products and procedures (including archiving).

- Respond to regulatory agency correspondence, guidelines and recommendations.
- Provide updates on regulatory changes and new developments.
- Provide annual training.
- Review program and obtain school board approval at least annually.

Integrated Pest Management (IPM) Parental Notification Minnesota Statutes, section 121A.30

Integrated Pest Management Definition. A pest control that emphasizes using a balanced combination of tactics (cultural, mechanical, biological, chemical) to reduce pests to tolerable levels while using pesticides as a last resort to minimize health and environmental risks.

Notice. Requires that a public or non-public school (excluding home schools) planning to apply a pesticide that is a toxic category I, II or III product, classified by U.S. EPA, or a restricted-use pesticide, as designated by federal law, on school property, must provide a notice to parents and employees.

School Handbook or Statement of Policies. In addition to the notice described above, a school that is required to provide a notice shall include in the official school handbook or policy guide a section informing parents that an estimated schedule of applications of pesticides is available for review or copying. A parent may also receive prior notice of each application if requested.

Notification for Individual Parents. Allows a parent to request individual notice of pesticide application on a day different from the days specified in the notice. Prior to applying pesticides, a school must give reasonable notice to a parent requesting such notice.

Integrated Pest Management Plan. Permits each school board to notify students, parents and employees that it has adopted an integrated pest management plan designed to minimize the risk to human health and the environment to reduce the use of chemical pesticides.

Pesticides and Pests Defined. “Pesticide” has the meaning given it in Minnesota Statutes, section 18B.01, Subdivision 18, except that it does not include any disinfectants, sanitizers, deodorizers, or antimicrobial agents used for general cleaning purposes. “Pest” has the meaning given it in Minnesota Statutes, section 18B.01, Subdivision 17.

Laboratory Safety Standard - Chemical Hygiene Plan (mandatory where science labs exist)

- Develop and implement a Chemical Hygiene Plan (CHP) for all laboratories, per OSHA Laboratory Safety Standard, 29 C.F.R., section 1910.1450.
- Identify school district chemical hygiene officer to administer the plan (mandatory).
- Review written plan as needed, and update (at least annually).
- Reference Prudence Practices in the Laboratory (http://www.nap.edu/catalog.php?record_id=4911#toc)

- Survey labs to identify potential chemical exposure hazards.
- Review current Chemical Hygiene Plan standard operating procedures.
- Evaluate chemicals against lab projects for necessary acquisition and quantities. Consider disposal of non-essential chemicals.
- Develop and document routine chemical handling, bulk dispensing procedures, storage and disposal procedures.
- Evaluate engineering controls (e.g., ventilation, chemical storage).
- Train affected employees on proper Chemical Hygiene Plan methods and techniques.
- Develop and document laboratory safety record-keeping procedures.
- Respond to regulatory agency correspondence, guidelines and recommendations.
- Monitor or provide updates on regulatory changes and new developments.
- Complete fume hood/exhaust ventilation survey. Post results on hood.
- Review program and obtain school board approval at least annually.

Lead in Water

- Develop and implement a written management plan for all drinking water taps.
- Identify school district contact person(s) for lead in drinking water.
- Implement Minnesota Department of Health (MDH) Lead in School Drinking Water Guidance Manual (http://www.health.state.mn.us/divs/eh/water/schools/).
- Survey each facility to determine the facility's drinking water taps and fixtures. Note- actual testing shall be identified as a separate project.
- Conduct water sampling as provided for under MDH and U.S. EPA rules and guidelines.
- Ensure replacement faucets and hardware meet current NSF lead-free criteria (NSF/ANSI Standard 372 and NSF/ANSI Standard 61, Annex G).
- Review updates on regulatory standards, reporting requirements and new developments.
- The U.S. EPA has developed the 3Ts (Training, Testing, and Telling) to help schools implement simple strategies to manage lead in schools (http://water.epa.gov/drink/info/lead/testing.cfm).
- Maintain all compliance documentation.
- Provide all record-keeping activities.

- Train affected employees.
- Review written plan as needed, and update (at least annually).

Lockout/Tagout

- Develop and implement a written management plan for lockout/tagout, encompassing OSHA standard 29 C.F.R., section 1910.147.
- Identify school district contact person(s) for lockout/tagout.
- Review written plan as needed, and update (at least annually).
- Survey the facility to identify energy potential physical hazards that require lockout/tagout.
- Develop and review machine-specific written lockout/tagout procedures.
- Train affected employees on proper lockout/tagout methods and techniques.
- Identify and procure individually assigned lockout/tagout locks, tags and other devices.
- Evaluate lockout/tagout record-keeping products and procedures.
- Respond to regulatory agency correspondence, guidelines and recommendations.
- Monitor or provide updates on regulatory changes and new developments.
- Review program and procedures, and obtain school board approval at least annually.

Machine Guarding

- Machine guarding contact person identified by name.
- A written machine-guarding (shop) plan developed for each area where fixed machines are used.
- Shop equipment safeguarded per machine shop and guarding best practices manual. Shop equipment not safeguarded should be scheduled for proper safeguarding or replaced.
- Provide and document training for affected employees.
- A written preventative maintenance program to maintain machine guarding in proper repair and order developed.
- Power outage protection provided for all required equipment.
- Emergency stops provided for all required equipment.
- Provide proper guards for all equipment.
- Post safe work practice placards for all equipment.

- Used good bid specification criteria for procurement of all future equipment.
- Provide non-slip surface by each piece of equipment.
- Secure fixed equipment to prevent shifting or moving.
- Maintain a log for each of shop or area to include employee and student accidents and injuries so that shop improvements can be determined. Corrective action as needed based on accident reports and near misses should be taken.
- Review the program with school board annually.

Mercury

(Note that the below listed physical items are not fundable under H&S, only the management of this topic is fundable)

CERTAIN MERCURY USE IN SCHOOLS PROHIBITED.

> Minnesota Statutes, section 121A.33 states that after December 31, 2007, schools (as defined in section 120A.22, Subdivision 4), excluding home schools, shall not:
>
> (1) purchase or use elemental mercury for any purpose; and,
>
> (2) purchase or use an instrument of measurement that contains mercury, including, but not limited to, a thermometer, barometer, or sphygmomanometer, or a manometer containing mercury.
>
> After December 31, 2009, a school shall not:
>
> (1) store elemental mercury for any purpose; and,
>
> (2) store an instrument of measurement that contains mercury, including, but not limited to, a thermometer, barometer, sphygmomanometer, or a manometer containing mercury.

This does not apply to thermostats for heating, ventilation, and air conditioning in the school.

OSHA Inspections

Participate in OSHA review of facility and provide management activity for programs.

Participate in MDE management assistance mock-OSHA review of facility and management programs. District response to this report is required.

Work with third-party inspectors such as insurance groups.

View General Industry OSHA standards (http://www.osha.gov) choose “General Industry” under Regulations/Standards.

Personal Protection Equipment (PPE)

- Develop and implement written personal protective equipment plan, in compliance with OSHA standard 29 C.F.R., sections 1910.132-138.
- Identify school district contact person(s).

- Review written plan as needed, and update (at least annually).
- District must survey the facility to identify unsafe, hazardous processes to hands, feet and face, per standards that necessitate the need for PPE.
- Provide a written hazard assessment signed by those performing the assessment, date of the assessment, and workplace evaluated.
- Perform initial and annual functional area training.
- Provide personal protective equipment as deemed appropriate for the identified hazards.
- Monitor usage, storage and maintenance practices of employees to ensure adequacy of program.
- Provide all record-keeping activities and procedures.
- Respond to regulatory agency correspondence, guidelines and recommendations.
- Review program and obtain school board approval at least annually.

Playground Safety

- Develop and implement written management plans for each playground.
- Identify school district contact person(s) for each playground.
- Conduct periodic site review and management plan update (at least annually).
- Present program review to school board at least annually.
- Conduct audit of district outdoor playground facilities for purpose of identifying equipment and site-related hazards referenced in the Consumer Products Safety Commissioner's (CSPC) current guidelines. See Consumer Product Safety Commission website (http://www.cpsc.gov). Also, see ASTM F 1487 "Standard Consumer Safety Performance Specification for Playground Equipment for Public Use."
- Develop, implement and maintain equipment maintenance checklists.
- For H&S funding, inspection by National Recreation and Park Association "Certified Playground Safety Inspector" is required.
- Review updates on regulatory, guidance standards and new developments.
- Review program and obtain school board approval at least annually.

Radon

- Develop and implement a written management plan for radon identification and remediation.
- Identify school district contact person(s) for radon.

- Implement current U.S. EPA/MDH Radon Gas testing guidance criteria.
- Conduct radon sampling under MDH and U.S. EPA guidelines.
- Per Minnesota Statutes, section 123B.571, report radon testing results at a school board meeting and report results to the MDH.
- Coordinate diagnostics and mitigation of elevated radon.
- Maintain records of all testing and mitigation information.
- Review updates on regulatory standards, reporting requirements and new developments.
- Respond to regulatory agency correspondence, guidelines and recommendations.
- Review program and obtain school board approval at least annually.

Respiratory Protection Standard

- Develop and implement a written management plan for respiratory protection, encompassing OSHA standard 29 C.F.R., section 1910.134.
- Identify school district contact person(s) for respirator protection.
- Review written plan as needed, and update (at least annually).
- Evaluate, identify and document work practices that require respirator protection.
- Employees who are required to use a respirator will need to complete a medical evaluation to comply with Appendix C of the standard.
- Review current respiratory protection practices and procedures, including selection, use (including user seal checks in Appendix B-1 of the standard), maintenance, and storage.
- Training respirator users (including employees who have voluntarily use respirators to be trained on Appendix D of the standard) on the provisions of the written respiratory protection program and on the respirators they use.
- Provide respirator fit testing to comply with Appendix A of the standard and optional pulmonary function tests for workers who wear respirators.
- Develop, document and monitor compliance with record-keeping procedures.
- Respond to regulatory agency correspondence, guidelines and recommendations.
- Monitor or provide updates on regulatory changes and new developments.
- Review program and obtain school board approval at least annually.

Underground Storage Tanks (UST) and Above Ground Storage Tanks (AST)

- Develop and implement a written management plan for each UST and AST.
- Identify school district contact person(s) for each UST and AST.
- Ensure all USTs above 110 gallons are MPCA-registered.
- Ensure all AST installations which are used for combustible materials are reviewed by fire marshal.
- Develop and implement release detection (e.g., tightness testing) plans for all USTs (fuel oil also).
- Conduct leak detection testing at frequent intervals for USTs if electronic monitors available.
- Produce and submit reports to agencies necessary for compliance (e.g., MPCA tank registration).
- Conduct periodic site review and management plan update (at least annually).
- Review updates on regulatory standards and reporting requirements.
- Provide and maintain inventory control forms.
- Review program and obtain school board approval at least annually.

Welding, Cutting or Brazing

- Develop and implement a written management plan for welding, cutting or brazing encompassing OSHA standard 29 C.F.R., sections 1910.251-.255.
- Identify a responsible district contact person.
- Survey the district to identify job categories in which employees may be at risk to exposure.
- Contact OSHA as there are many requirements, reference welding, cutting or brazing. (http://www.osha.gov/SLTC/weldingcuttingbrazing/index.html).
- Identify and implement safe work practices, including hot work permit/fire watch, health protection and ventilation.
- Provide annual training to affected employees.
- Provide adequate personal protective equipment.
- Maintain applicable recordkeeping.
- Provide a written program review, and update (at least annually).