

443 Lafayette Road N.
St. Paul, Minnesota 55155
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(651) 284-5005
1-800-342-5354
TTY: (651) 297-4198

February 14, 2017

Mr. Chris LOOS
Safety Director
Saint Cloud Technical and Community College
1540 Northway Drive
Saint Cloud, MN 56303

Dear Mr. Chris LOOS:

In response to your request, Vikki Sanders conducted a Limited Service Safety consultation survey at your site on February 2, 2017. Enclosed is a report that includes the identified serious hazards, projected schedule for correction, and a *Hazard Correction Form* used to record the corrective actions on the identified hazards. Please use Visit Number 507073138 when referencing this report.

The *Hazard Correction Form* should be completed on-line at <https://secure.doli.state.mn.us/hazards/> utilizing the visit number 507073138 and this visit key 28949. If you do not have computer access the form can be mailed or faxed to us. Diligence in timely abatement correction and reporting is an expected component of the consultation process.

It is imperative that you meet the above requirements because Workplace Safety Consultation activity can affect Minnesota OSHA Compliance inspections. A consultation can affect the priority of a *programmed* OSHA Compliance safety or health inspection; however, an *unprogrammed* compliance inspection, which includes accidents, complaints, referrals and follow-ups, takes priority over a consultation in progress. With written verification, the changed priority can begin 10 business days prior to the scheduled visit date. It expires on the latest correction due date indicated on the *Hazard Correction Form*.

If needed, an employer must submit a written request with information on interim protection for an extension prior to the due date, ensuring adequate time for Workplace Safety Consultation review. If the request is approved, the "in progress" time frame is extended and a letter granting the extension will be sent, indicating the new correction date. If the request is denied, the "in progress" time frame remains as originally indicated. In the event of a *programmed* inspection, Minnesota OSHA Compliance will need to see written verification of any "in progress" consultation activity before withdrawing from this planned inspection.

It must be noted that a Compliance Officer is not legally bound by the advice we have given you, or by any failure on our part to point out any specific hazards, nor are they bound by our hazard classifications. You may, but are not required to, furnish a copy of this report to the Compliance Officer.

The report contains recommendations about how to: correct identified hazards, prevent their recurrence, and improve management practices for ongoing, systematic hazard prevention. This helps to ensure your program's effectiveness in preventing worker injuries and illnesses. We encourage you to inform your employees of the action you take. This knowledge will help them to do their part to maintain a safe and healthful workplace and it will let them know of your concern for their welfare.

Thank you for seeking our assistance. If you need additional information, we encourage you to contact us at (651) 284-5060.

Sincerely,

A handwritten signature in black ink, appearing to read "Tyrone Taylor". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Tyrone Taylor
Director, Workplace Safety Consultation

MNOSHA Workplace Safety Consultation Program
Workplace Safety Consultation Report

For

Saint Cloud Technical and Community College
1540 Northway Drive
Saint Cloud, MN 56303
Visit Number: 507073138

Submitted By:

Vikki Sanders
Department of Labor and Industry
Workplace Safety Consultation
443 Lafayette Road North
St Paul, MN 55155
Phone: (651) 284-5060
Fax: (651) 284-5739
1-800-657-3776

INTRODUCTION

At the request of Mr. Chris LOOS, Safety Director, a Limited Service Safety hazard survey was conducted with Saint Cloud Technical and Community College at 1540 Northway Drive, Saint Cloud, MN 56303, on February 2, 2017 by Vikki Sanders from the Minnesota Department of Labor and Industry.

The observed hazards detailed in this report are identified by item number and are referenced to the appropriate OSHA standards.

A **Serious** hazard is a condition that could result in an injury or illness that causes prolonged or temporary impairment of the body or substantially reduces efficiency on or off the job. Examples of such injuries are amputations, fractures, deep cuts involving significant bleeding, disabling burns, and concussions. Included under serious hazard is **Imminent Danger**. These are hazards that can reasonably be expected to cause death or serious physical harm immediately or before this written report is received. Any such hazards would have been corrected immediately, and no correction dates or correction method would appear in the *Report of Hazards Found*.

Hazards identified as **Serious** must be corrected by the correction due date and written notification of how the hazards were corrected must be sent to us by that date. An extension of the time frame set for the correction of the serious hazards may be requested in writing if you have made a good faith effort to correct the hazards, show that the delay was beyond your control, and give assurance that interim safeguards are in use to protect employees from the hazards.

Other-Than-Serious hazards, as defined by OSHA, lack the potential for causing serious physical harm, but could have a direct impact on employee safety and health. We encourage you to correct these hazards.

Regulatory hazards reflect violations of OSHA posting requirements, record-keeping requirements, and reporting requirements as found in 29 CFR 1903 and 1904. We encourage you to correct these hazards.

OVERVIEW OF CONSULTATION ACTIVITIES

This survey included an opening conference, a walk-through of the work site, MState community college in St. Cloud, and a closing conference. The opening conference was held with: Chris Loos - Safety Director, Jason Theisen - Director of Facilities, Don Beckering - Director of Safety, and Lori Koos - VP of administration. The opening conference included a review of the Consultation Program and the employer's obligation to correct any items classified as "serious" under current OSHA standards.

The walk-through included a survey of This Survey consist of a Walkthrough of the facility. Chris Loos - Safety Director, Jason Theisen - Director of Facilities, Don Beckering - Director of Safety, Kelly Halverson - Dean of Natural Science, Larry Gordon - Lab Assistant, Tim Shay - Faculty, and Darren Strosahl - Dean of Trades and Industry accompanied the consultant during the walk-through. In addition, company employees were interviewed during the consultation survey. During the closing conference, attended by: Chris Loos - Safety Director, Jason Theisen - Director of Facilities, and Don Beckering - Director of Safety, a review of the hazards identified during the survey was conducted. After a discussion of the recommended abatement procedures, the time frame for correction of serious hazards was agreed to by the employer's authorized representative and the consultant. Findings of the safety and health management system evaluation were also discussed, and recommendations were provided for some management elements requiring further

improvement.

NOTICE OF OBLIGATION

As you know, we are required to notify the Occupational Safety and Health Administration (OSHA) if serious hazards are not corrected within the required time(s). Extensions may be granted if you encounter difficulties completing correction within these time frames, but we must receive your request for an extension, in writing, before the correction due date.

Should you need an extension for one or more hazard items, you can use the bottom section of each hazard item listed in the *Hazard Correction Form* to make that request. Please see the guidelines listed in the *Hazard Correction Form* page. Extension requests shall be documented on The *Hazard Correction Form*, which can be completed on-line at <https://secure.doli.state.mn.us/hazards/> utilizing the visit number 507073138 and this visit key 28949. If you do not have computer access, the form can be mailed or faxed to us.

Although we are not required to notify OSHA if other-than-serious hazards are not corrected, these hazards could result in injury to your employees. Moreover, your company would be subject to citations for them in the event of an OSHA enforcement inspection.

In the event of an OSHA inspection, it is important to remember that the Compliance Officer is not legally bound by the consultant's advice or by the consultant's failure to point out a specific hazard. You may, but are not required to, furnish a copy of this report to the Compliance Officer, who may use it to determine your good faith efforts toward safety and health and reduce any proposed penalties. You are, however, required to furnish any employee exposure data from this report as required by 29 CFR 1910.1020.

Attachment - Report of Hazards Found

Item: **0001** Instance: **A**
Standard: **1910.145(c)(3)**

Hazard Type: **Serious**
Correction Due Date: **4/19/2017**

Description: 29 CFR 1910.145(c)(3): Safety instruction signs were not used where there was a need for general instructions and suggestions relative to safety measures:

The eye wash was not properly identified by signs on the inside of the bio materials room and also on the door outside of the room to let employees know where the nearest eye wash was located.

Recommended Action: Place visible signage above eyewash and also outside of the room where other people who work with chemicals may need to find the eyewash

Item: **0002** Instance: **A**
Standard: **1910.159(c)(10)**

Hazard Type: **Other**
Correction Due Date:

Description: 29 CFR 1910.159(c)(10): The minimum vertical clearance of 18 inches between automatic sprinkler systems sprinklers and the material below was not maintained:

In the Bio Lab there was material stored on shelving that came within the 18" of the sprinkling heads.

Recommended Action: Building contents should not interfere with sprinkler discharges. Ensure that the minimum vertical clearance between sprinklers and material below is 18 inches.

Item: **0003** Instance: **A**
Standard: **1910.37(b)(2)**

Hazard Type: **Serious**
Correction Due Date: **3/27/2017**

Description: 29 CFR 1910.37(b)(2): Exits were not marked by a readily visible sign reading "Exit":

In stairway D, There was not an exit sign on the outside of the door but when you enter the door there was no sign leading you to the outside exit and the stairs leading downstairs did not indicate that you should not go downstairs to exit the building.

Recommended Action: Provide an emergency exit sign.

Item: **0004** Instance: **A**
Standard: **1910.37(a)(4)**

Hazard Type: **Serious**
Correction Due Date: **4/6/2017**

Description: 29 CFR 1910.37(a)(4): All safeguards designed to protect employees during an emergency, (e.g. sprinklers, alarm systems, fire doors, exit lighting) must be in proper working order at all times:

In stairway D, There was not an exit sign on the outside of the door but when you enter the door there was no sign leading you to the outside exit and the stairs leading downstairs did not indicate that you should not go downstairs to exit the building.

Recommended Action: Put a stairwell interruption gate in the stairwell to prevent people from traveling past the floor where they should exit.

The requirement for a means to interrupt the flow of traffic in a stairwell is found in section 7.7.3 of the 2000 edition of the Life Safety Code. The code itself says stairs that continue more than ½ story beyond the level of exit discharge must have a means to interrupt the traffic flow such as a partition, door, or “other effective means”. The reason for this interruption is to prevent people from exiting further down the stairs in an emergency and missing the door to the exit discharge.

Item: **0005** Instance: **A**
Standard: **1910.305(j)(2)(iv)**

Hazard Type: **Serious**
Correction Due Date: **4/6/2017**

Description: 29 CFR 1910.305(j)(2)(iv): Receptacles installed in wet or damp locations were not suitable for the location:

In the mechanical room near sump pump 002
And in the truck garage

Recommended Action: Replace all outlets located near damp or wet locations with a GFCI.
Consider upgrading to the NEC electrical standards for GFCI.

Item: **0006** Instance: **A**
Standard: **1910.305(g)(1)(iv)(B)**

Hazard Type: **Serious**
Correction Due Date: **3/6/2017**

Description: 29 CFR 1910.305(g)(1)(iv)(B): Unless specifically permitted otherwise in paragraph (g)(1)(ii) of this section flexible cords may not be used where run through holes in walls, ceilings, or floors:

The microwave in the conference room was inside of a cupboard. The cord ran through a hole on the floor of the cupboard to the outlet

Recommended Action: Do not run cords through holes in walls ceilings or floors

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MINNESOTA DEPARTMENT OF
LABOR & INDUSTRY

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February 16, 2017

Chris Loos
Safety Director
St Cloud Technical and Community College
1540 Northway Drive
Saint Cloud, MN 56303

Dear Chris Loos:

In response to your request, Mike Larson conducted a Limited Service Health consultation survey at your site on February 2, 2017. Enclosed is a report that includes the identified serious hazards, projected schedule for correction, and a *Hazard Correction Form* used to record the corrective actions on the identified hazards. Please use Visit Number 507073336 when referencing this report.

The *Hazard Correction Form* should be completed on-line at <https://secure.doli.state.mn.us/hazards/> utilizing the visit number 507073336 and this visit key 28971. If you do not have computer access the form can be mailed or faxed to us. Diligence in timely abatement correction and reporting is an expected component of the consultation process.

It is imperative that you meet the above requirements because Workplace Safety Consultation activity can affect Minnesota OSHA Compliance inspections. A consultation can affect the priority of a *programmed* OSHA Compliance safety or health inspection; however, an *unprogrammed* compliance inspection, which includes accidents, complaints, referrals and follow-ups, takes priority over a consultation in progress. With written verification, the changed priority can begin 10 business days prior to the scheduled visit date. It expires on the latest correction due date indicated on the *Hazard Correction Form*.

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Thank you for seeking our assistance. If you need additional information, we encourage you to contact us at (651) 284-5060.

Sincerely,

Tyrone Taylor
Director, Workplace Safety Consultation

MNOSHA Workplace Safety Consultation Program
Workplace Safety Consultation Report

For

St Cloud Technical and Community College
1540 Northway Drive
Saint Cloud, MN 56303
Visit Number: 507073336

Submitted By:

Mike Larson
Department of Labor and Industry
Workplace Safety Consultation
443 Lafayette Road North
St Paul, MN 55155
Phone: (651) 284-5060
Fax: (651) 284-5739
1-800-657-3776

INTRODUCTION

At the request of Chris Loos, Safety Director, a Limited Service Health hazard survey was conducted with St Cloud Technical and Community College at 1540 Northway Drive, Saint Cloud, MN 56303, on February 2, 2017 by Mike Larson from the Minnesota Department of Labor and Industry.

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OVERVIEW OF CONSULTATION ACTIVITIES

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The walk-through included a survey of the health science building, medium/heavy truck lab, and the facilities warehouse. Chris Loos - Saety Director, Jason Theisen - Director of Facilities, Don Beckering - Director of Safety, Kelly Halverson - Dean of Natural Science, Larry Gordon - Lab Assistant, Tim Shay - Facilities, and Darren Strosahl - Dean of Trades and Industry accompanied the consultant during the walk-through. In addition, five company employees were interviewed during the consultation survey. During the closing conference, attended by: Chris Loos - Saety Director, Jason Theisen - Director of Facilities, Don Beckering - Director of Safety, and Lori Koos - VP of Administration, a review of the hazards identified during the survey was conducted. After a discussion of the recommended abatement procedures, the time frame for correction of serious hazards was agreed to by the employer's authorized representative and the consultant. Findings of the safety and health management system evaluation were also discussed, and recommendations

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Attachment - Report of Hazards Found

Item: **0001** Instance: **A**
Standard: **1910.101(b)**

Hazard Type: **Serious**
Correction Due Date: **3/6/2017**

Description: 29 CFR 1910.101(b): Section 3.3.8, Compressed Gas Association pamphlet P1-1965, as adopted by 29 CFR 1910.101(b): Compressed gas cylinder(s) were stored near elevators, gangways or in locations where heavy moving objects could strike or fall on them:

Compressed gas cylinders located in the EMT Lab were not stored in a secure fashion to prevent damage.

Recommended Action: Section 3.3.8 Compressed Gas Association pamphlet P-1-1965. Compressed gas cylinders should not be stored near exits, stairways, or in areas normally used, or intended to be used, for the safe exit of people. Designate a specific area for storage of cylinders. Cylinders should be located so as to minimize exposure to excessive temperature, physical damage or tampering. Empty containers should be stored outside. If stored inside, however, they should be considered full, and protected from damage.

Item: **0002** Instance: **A**
Standard: **1910.132(d)(1)**

Hazard Type: **Serious**
Correction Due Date: **3/6/2017**

Description: 29 CFR 1910.132(d)(1) and (2): A hazard assessment was not made of the workplace, with a written certification, to determine if hazards are present, or are likely to be present, which necessitate the use of personal protective equipment:

An open container of BETCO AX-IT Plus was located in the in facilities department and the employer was not sure what was in the container. A hazard assessment had not been performed on this chemical to determine what PPE was necessary and how it should be properly stored.

Recommended Action: The employer shall assess the workplace to determine if hazards are present, or are likely to be present, which necessitate the use of personal protective equipment (PPE). Once needs are determined, proper PPE shall be provided and its use encouraged or enforced.

Item: **0003** Instance: **A**
Standard: **1910.95(c)(1)**

Hazard Type: **Serious**
Correction Due Date: **5/3/2017**

Description: 29 CFR 1910.95(c)(1): A continuing, effective hearing conservation program as described in 29 CFR 1910.95(c) through (n) was not instituted when employee noise exposures equaled or exceeded an 8-hour time-weighted average sound level of 85 dBA:

Employees operated the bobcat for more than 4 hours and the approximate noise level inside the cab was 91 dBA. After 4 hours at 90 dBA the employee would be over the action level of 85 dBA as an 8-hour time weighted average. The employer did not have an effective hearing conservation program in place.

Recommended Action: Implement a hearing conservation program that includes training on the effects of noise on hearing, offer annual audiograms, and provide three types of hearing protection.

Item: **0004** Instance: **A**
Standard: **1910.1052(d)(2)**

Hazard Type: **Serious**
Correction Due Date: **3/6/2017**

Description: 29 CFR 1910.1052(d)(2): Where employees were exposed to methylene chloride, the employer did not perform initial exposure monitoring to determine each affected employee's exposure:

The employer was using paint stripper that contained methylene chloride and initial monitoring had not been conducted.

Recommended Action: Try to substitute the paint stripper with one that does not contain methylene chloride.

If not, then periodic monitoring needs to be conducted according to the schedule outlined below. The minimum required frequency of monitoring follows:

- 1) If the initial determination reveals employee exposure to be below the Action Level (12.5 ppm 8-hour TWA) and at or below the STEL (125 ppm, 15-minute TWA), 8-hr TWA and STEL monitoring are not required. The measurements need not be repeated unless a production, process, control or personnel change may result in new or additional exposure to methylene chloride.
- 2) If the initial determination reveals employee exposure to be below the Action Level and above the STEL, 8-hr TWA monitoring is not required; monitor STEL exposures every three months.
- 3) If the initial determination reveals employee exposure to be at or above the Action Level, at or below the 8-hour TWA PEL (25 ppm, 8-hour TWA), and at or below the STEL; monitor 8-hour TWA exposures every six months.
- 4) If the initial determination reveals employee exposure to be at or above the Action Level; at or below the 8-hour TWA PEL, and above the STEL; monitor 8-hr TWA exposures every six months and monitor STEL exposures every three months.
- 5) If the initial determination reveals employee exposure to be above the 8-hour TWA PEL and at or below the STEL; monitor 8-hour TWA exposures every three months.

Item: **0005** Instance: **A**
Standard: **5205.200(2)**

Hazard Type: **Serious**
Correction Due Date: **5/3/2017**

Description: Minn. Rules 5205.0200 subp 2: Ventilation for garages was not capable of removing a volume of air not less than three-fourths cubic foot per minute per square foot of floor area. Exhaust ducts shall not be more than 18 inches from the floor, so placed as to remove carbon monoxide gas from the entire garage. An equal amount of tempered fresh supply air shall be provided:

The medium/heavy truck lab ventilation system was not tested on a regular basis to ensure that it was capable of removing three-fourths cubic foot per minute per square foot of floor area.

Recommended Action: Have the ventilation system tested to ensure it is removing the required amount of air.

Item: **0006** Instance: **A**
Standard: **5205.200(3)**

Hazard Type: **Serious**
Correction Due Date: **5/3/2017**

Description: Minn. Rules 5205.0200 subp. 3: Exhaust gases from internal combustion engines being tested were not discharged to the outdoors through a duct or flexible hose of noncombustible material of suitable size attached as an extension to the exhaust pipe:

The exhaust in cubic feet per minute (cfm) had not been tested on the tailpipe exhaust system in the medium/heavy truck lab where they work on diesel engines.

Recommended Action: Tailpipe exhaust ventilation for 200 HP and under engines should be at least 100 cfm per tailpipe. For over 200 HP, 200 cfm per tailpipe, and 400 cfm per tailpipe for diesel engines.

Item: **0007** Instance: **A**
Standard: **5206.1000(7)**

Hazard Type: **Serious**
Correction Due Date: **3/6/2017**

Description: Minn. Rules 5206.1000 subp. 7: The employer shall ensure that each container of hazardous substances in the workplace that is not labeled in accordance with the requirements of this part, is labeled, tagged, or marked with at least the following information: the identity of the hazardous substance and the appropriate hazard warning:

In boiler room 007, there were what looked like chlorine tablets that were stored in an unlabeled container.

Recommended Action: Label the container with the contents and any associated hazards.
