443 Lafayette Road N. St. Paul, Minnesota 55155 www.dli.mn.gov



(651) 284-5005 1-800-342-5354 TTY: (651) 297-4198

Mr. Chris Loos Safety Officer St Cloud Technical and Community College 1540 Northway Drive St 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 October 6, 2015. 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 507064293 when referencing this report.

The *Hazard Correction Form* should be completed on-line at <a href="https://secure.doli.state.mn.us/hazards/">https://secure.doli.state.mn.us/hazards/</a> utilizing the visit number 507064293 and this visit key 28004. 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,

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 St Cloud, MN 56303 Visit Number: 507064293

### 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 Officer, a Limited Service Safety hazard survey was conducted with St Cloud Technical and Community College at 1540 Northway Drive, St Cloud, MN 56303, 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, Technical and Community College in St Cloud, and a closing conference. The opening conference was held with: Chris LOO. 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 St Cloud Technical College campus. 2 company employees were interviewed during the consultation survey. During the closing conference 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 <a href="https://secure.doli.state.mn.us/hazards/">https://secure.doli.state.mn.us/hazards/</a> utilizing the visit number 507064293 and this visit key 28004. 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 Hazard Type: **Other** Standard: **1910.36(g)(4)** Correction Due Date:

Description: 29 CFR 1910.36(g)(4): Objects that project into an exit route must not reduce the width of the route to less than the minimum width requirements for exit routes:

Saw horse outside of the exit reduce the exit route to less than the minimum width required

Recommended Action: Make sure that exits routs are cleared of objects or material that may hinder a quick exit out of the building in a time of emergency.

Item: **0002** Instance: A Hazard Type: **Other** Standard: **1910.176(b)** Correction Due Date:

Description: 29 CFR 1910.176(b): Material stored in tiers was not stacked, blocked, interlocked or limited in height so that it was stable and secure against sliding and collapse:

- 1-396 Carpentry wood stored on the shelf by the exit was not stable
- 1-393 Plumbing lab Materials stored on top of cabinets unstable
- 1-393 2x4 with cable wrapped around it was hanging in the rafter
- 1-385 wett lab materials stored on sprinkler pipes also items piled up above handrail on mezzanine and storage hook is pulling away from the wall.

Recommended Action: Restack stored materials so that they do not create a hazard. Train workers on the importance of good material handling/storage practices and inspect storage areas at regular intervals to be sure they are kept in a safe condition.

Do not store materials on places not designed for storage. Such as electrical panels, fire cabinets, hand rails, sprinkler system.

Item: **0003** Instance: A Hazard Type: **Other** Standard: **1910.303(f)(2)** Correction Due Date:

Description: 29 CFR 1910.303(f)(2): Each service, feeder and branch circuit, at its disconnecting means or overcurrent device, was not legibly marked to indicate its purpose, nor located and arranged so the purpose was evident:

In room I396the carpentry shop, the power shut offs were not labeled to identify their purpose.

In room 1-390 General lab

Recommended Action: Markings which are legible, easily understood, and capable of withstanding the environment should be placed on each electrical disconnecting means.

Item: **0004** Instance: **A** Hazard Type: **Other** Standard: **1910.242(b)** Correction Due Date:

Description: 29 CFR 1910.242(b): Compressed air used for cleaning purposes was not reduced to less than 30 p.s.i. when dead-ended:

Carpentry room I396 compressed air hoses used for cleaning was not reduced to 30 p.s.l when dead ended.

Recommended Action: Turn down the air pressure so that it is 30 p.s.i or replace the nozzle so that air pressure is reduced when dead ended.

Do not use the air hose for cleaning without ppe

Item: **0005** Instance: **A** Hazard Type: **Other** Standard: **1910.22(a)(1)** Correction Due Date:

Description: 29 CFR 1910.22(a)(1): Place(s) of employment shall be kept clean and orderly, or in a sanitary condition:

In the carpentry shop I396 Dust collection and housekeeping in the carpentry area. Clean flammable storage cabinet. do not store rags with flammable substance on them in flammable cabinet, use oil rag container.

Recommended Action: Keep dust accumulation to a minimum by cleaning up after using equipment or using an efficient dust collector system.

Item: **0006** Instance: **A** Hazard Type: **Other** Standard: **5206.1000(1)** Correction Due Date:

Description: Minn. Rules 5206.1000 subp. 1 & 7: Hazardous substances were not labeled as required by the Employee Right-To-Know Act:

I396 carpentry secondary containers did not have the hazard warnings or the identity of the chemical on the container

Recommended Action: Label all containers of hazardous chemicals that are not in the immediate use and possession of an employee with the proper hazardous warning and identification of the chemical according to the hazardous chemical standard.

Item: **0007** Instance: A Hazard Type: **Other** Standard: **1910.132(d)(1)** Correction Due Date:

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:

A ppe assessment needs to be done for those who wear dust mask or N95 respirators. Also there was PPE found in unsanitary condition.

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. If it is decided that a respirator is not needed to safely perform the job then the employer shall provide Appendix D for volunteer use.

Item: **0008** Instance: **A** Hazard Type: **Other** 

Standard: 1910.22(d)(1) Correction Due Date:

Description: 29 CFR 1910.22(d)(1): In every building or other structure, or part thereof, used for mercantile, business, industrial, or storage purposes, the loads approved by the building official were not marked on plates of approved design which shall be supplied and securely affixed by the owner of the building, or his duly authorized agent, in a conspicuous place in each space to which they relate:

Load rating is needed in 1-393 plumbing Lab for the mezzanine.

Recommended Action: Determine the load rating for the mezzanine and place a sign in a conspicuous place to the area assigned.

#### Attachment - Hazard Correction Form

Use copies of this form to send documentation of your hazard correction to the Workplace Safety Consultation unit. For each item in the report classified as "serious", complete one of the following hazard correction sections and fax or mail a copy to the consultant at the following address, on or before the correction due date.

As you know, we are required to notify MNOSHA Compliance if serious hazards are not corrected within the agreed-upon time. Extensions may be granted if you encounter difficulties completing the required corrections within the mutually agreed upon time frames.

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 the request. Please see the guidelines listed in the Hazard Correction Form page. Extension requests shall be documented on the Hazard Correction Form, which should be completed on-line at https://secure.doli.state.mn.us/hazards/ utilizing the visit number 507064293 and your unique code 28004. If you do not have computer access, the form can be mailed or faxed to us.

Although we are not required to notify MNOSHA if other-than-serious hazards are not corrected, these hazards should also be corrected because they can result in injury to your employees. Your company also would be subject to citations for them in the event of a MNOSHA Compliance inspection.

Vikki Sanders Workplace Safety Consultant

Department of Labor and Industry
Workplace Safety Consultation
443 Lafayette Road North
St. Paul, MN 55155-4311
Email: osha.consultation@state.mn.us

Phone: (651) 284-5060 Fax: (651) 284-5739 1-800-657-3776

The Hazard Correction Form should be completed on-line at https://secure.doli.state.mn.us/hazards/ utilizing the visit number 507064293 and this unique visit key 28004. 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.

St Cloud Technical and Community College - Visit # 507064293

Employer Signature/Title:		

#### Safety and Health Program Management

During the on-site visit, the consultant is required to review and discuss the components that make up an effective safety and health management system. The tool that is used for this assessment is referred to as the Safety and Health Program Assessment Worksheet. The assessment contains safety management attributes that are derived from the 1989 OSHA Safety and Health Program Management Guidelines. Each attribute that is evaluated is documented and given a score that is an indication of the attribute's effectiveness. The findings and improvement recommendations, for each attribute evaluated, are based on the findings obtained during the consultation and the consultant's professional judgment. Evaluations are based on interviews with employees, observed workplace activities and conditions, and documentation review.

A copy of the assessment worksheet, for your work-site, is included as part of this report. Some attributes may be left blank if the consultant is unable to obtain enough information to determine a score for that attribute. Please take the time to review the assessment information. Improving attributes that received a low score may help you avoid the recurrence of hazards that were noted during the visit and prevent the occurrence of other hazards.

# Attachment - List of Hazards Minnesota Department of Labor & Industry Workplace Safety Consultation

#### **List of Hazards**

This *List of Hazards* must be posted, unedited, in a prominent place where it is readily observable by all affected employees for 3 working days, or until the hazards are corrected, whichever is later.

VISIT NUMBER: 507064293 VISIT DATE: 10/06/2015

St Cloud Technical and Community College 1540 Northway Drive St Cloud, MN 56303

This is a notification of serious hazards identified during the consultation visit. **This notification is not a citation.** St Cloud Technical and Community College is a voluntary participant in the consultation program and has agreed to correct the hazards on this list within the correction due date specified. St Cloud Technical and Community College has also agreed to make information on other-than-serious hazards as well as corrective action proposed by the consultant available to you upon request.

Item: 0001 Instance: A

Standard: 1910.36(g)(4) Correction Due Date:

Description: 29 CFR 1910.36(g)(4): Objects that project into an exit route must not reduce the width of the route to less than the minimum width requirements for exit routes:

Saw horse outside of the exit reduce the exit route to less than the minimum width required

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1-393 2x4 with cable wrapped around it was hanging in the rafter

1-385 wett lab materials stored on sprinkler pipes also items piled up above handrail on mezzanine and storage hook is pulling away from the wall.

Item: 0003 Instance: A

Standard: 1910.303(f)(2) Correction Due Date:

Description: 29 CFR 1910.303(f)(2): Each service, feeder and branch circuit, at its disconnecting means or overcurrent device, was not legibly marked to indicate its purpose, nor located and arranged so the purpose was evident:

In room I396 the carpentry shop, the power shut offs were not labeled to identify their purpose.

In room 1-390 General lab area the power shut offs were not labeled

Item: 0004 Instance: A

Standard: 1910.242(b) Correction Due Date:

Description: 29 CFR 1910.242(b): Compressed air used for cleaning purposes was not reduced to

less than 30 p.s.i. when dead-ended:

I Carpentry room 1396 compressed air hoses used for cleaning was not reduced to 30 p.s.l when dead ended.

Item: **0005** Instance: **A** 

Standard: 1910.22(a)(1) Correction Due Date:

Description: 29 CFR 1910.22(a)(1): Place(s) of employment shall be kept clean and orderly, or in a

sanitary condition:

In the carpentry shop I396 Dust collection and housekeeping in the carpentry area. Clean flammable storage cabinet. do not store rags with flammable substance on them in flammable cabinet, use oil rag container.

Item: 0006 Instance: A

Standard: **5206.1000(1)** Correction Due Date:

Description: Minn. Rules 5206.1000 subp. 1 & 7: Hazardous substances were not labeled as

required by the Employee Right-To-Know Act:

I396 carpentry secondary containers did not have the hazard warnings or the identity of the chemical on the container

Item: 0007 Instance: A

Standard: 1910.132(d)(1) Correction Due Date:

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:

A ppe assessment needs to be done for those who wear dust mask or N95 respirators. Also there was PPE found in unsanitary condition.

Item: 0008 Instance: A

Standard: 1910.22(d)(1) Correction Due Date:

Description: 29 CFR 1910.22(d)(1): In every building or other structure, or part thereof, used for mercantile, business, industrial, or storage purposes, the loads approved by the building official were not marked on plates of approved design which shall be supplied and securely affixed by the owner of the building, or his duly authorized agent, in a conspicuous place in each space to which they relate:

Load rating is needed in 1-393 plumbing Lab for the mezzanine.

If you have any questions regarding this list of hazards that cannot be answered by a representative of St Cloud Technical and Community College, please contact the state Consultation program at 651-284-5060 or send an e-mail to the Consultant's e-mail address vikki.sanders@state.mn.us.