

<p style="text-align:center">SUMMARY OF EMPLOYEE ENVIRONMENTAL HEALTH AND SAFETY PROGRAMS</p>
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POLICY STATEMENT

It is the policy of the White Bear Lake Area Schools to provide a safe and healthy work and learning environment for all employees and students. The district will provide appropriate equipment, safeguards, personal protection, training and administrative support to protect employee safety and health. District employees will be trained to work safely and will be required to comply with all safety rules and standards.

BACKGROUND

The Minnesota Occupational Safety and Health Administration (MNOSHA) requires employers with higher than average injury and illness rates to develop a comprehensive written health and safety program. **Although these programs are considered optional for most schools, the Minnesota Department of Education has encouraged school districts to develop and implement accident and injury reduction programs and other health and safety management programs.**

The purpose of **A Workplace Accident and Injury Reduction Program (AWAIR)** is to reduce employee injuries and illnesses by identifying, analyzing and controlling hazards. Under these programs, all accidents and near misses are to be investigated and measures are to be taken to correct problems. Employers are expected to develop and enforce mandatory safe work practices, while providing the equipment and safeguards necessary for employees to work safely. These plans must be communicated to employees so they can participate and take an active role in health and safety. Employers with more than 25 employees are expected to form a joint health and safety committee to involve employees in the program.

SUMMARY

The White Bear Lake Area School District has developed A Workplace Accident and Injury Reduction Program (AWAIR) to promote safe and healthful working conditions based on clearly stated goals and objectives. This program includes requirements covered under Minnesota Statutes 182.653, *A Workplace Accident and Injury Reduction Act*. In addition, written management programs have been developed and implemented for over 20 other health and safety areas.

PROGRAM GOALS

The district has established the following goals for the AWAIR program:

1. Continuously reduce annual lost workday incident rate for each district location below level from previous year.
2. Bring each building into compliance with applicable occupational safety and health (MNOSHA) regulations identified in health and safety audits.
3. Implement continuing, effective health and safety programs to provide district employees with a safe and healthful workplace.
4. Actively encourage district employee involvement in health and safety programs.

PROGRAM OBJECTIVES

The district has identified the following steps for accomplishing these goals:

- 1. Assign responsibilities.**
- 2. Establish systems** for identifying, analyzing and controlling hazards.
- 3. Communicate program** effectively and encourage employee participation.
- 4. Investigate all incidents.**
- 5. Enforce safe work practices** and rules.

Copies of the district AWAIR Program are available to employees upon request.

RESPONSIBILITIES

The Health & Safety Coordinator manages the district AWAIR program with oversight by a district-wide Environmental Health and Safety Committee. Responsibilities for implementation of district environmental health and safety programs are assigned as follows:

Health & Safety Coordinator

- Requests funding to maintain effective health and safety programs
- Oversees and coordinates implementation of AWAIR program
- Provides new employee orientation
- Monitors program effectiveness, revising program as necessary
- Evaluates and updates AWAIR program annually
- Conducts routine inspections
- Performs follow-up to verify problems are corrected promptly
- Oversees accident and incident investigations
- Oversees Job Hazard Analyses (JHAs)
- Oversees scheduling of health and safety meetings/training sessions
- Encourages and reinforces employee participation in health and safety matters

Environmental Health and Safety Committee Members

- Attend committee meetings
- Complete assigned tasks determined by committee (inspections, job hazard assessments, accident investigations, etc.)
- Post copies of minutes
- Ask co-workers for suggestions and input
- Communicate about safety issues and encourage safe behavior
- Recommend corrections and follow-up to be sure actions are taken

District Employees

- Provide comments, ideas, and suggestions about safety
- Report all accidents and incidents
- Attend required safety training and meetings

IDENTIFYING, ANALYZING AND CONTROLLING HAZARDS

The Health & Safety Coordinator oversees implementation and maintenance of health and safety management programs and MNOSHA compliance activities. Routine site visits and program reviews are conducted at each district location to verify compliance or identify hazardous conditions and work practices.

Written management programs have been developed for the following health and safety areas:

1. Art Safety
2. Asbestos Program
3. AWAIR - Safety Committee (Accident and Injury Reduction Program)
4. Bloodborne Pathogens Program- Exposure Control Plan
5. Community Right-to-Know Program
6. Compressed Gas Safety Program
7. Confined Space Entry Program
8. Emergency Action and Fire Prevention Program
9. Employee Right-to-Know Program
10. Ergonomics Program
11. First Aid/CPR/AED Program
12. Food Service Safety Program
13. Hazardous Air Emissions (Boilers) Program
14. Hazardous Waste Program
15. Hearing Conservation Program
16. Indoor Air Quality Program
17. Integrated Pest Management Program
18. Laboratory Safety - Chemical Hygiene Program
19. Lead-in-Water/Paint Program
20. Lockout/Tagout - Energy Control Program
21. OSHA Inspections, 300 Logs
22. Personal Protective Equipment Program
23. Playground Safety Program
24. Radon
25. Technology Education Safety Program
26. USTs/ASTs - Underground and Above Ground Storage Tanks
27. Miscellaneous

Hazardous Incident/Accident Investigations

All hazardous **incidents** (“near misses”) and **accidents** are to be investigated and corrective actions taken. The Health & Safety Coordinator oversees health and safety investigations, including:

- Maintaining form(s) to report, document and analyze all incidents
- Promptly performing hazardous **incident** (“near miss”) and **accident** investigations
- Implementing corrective actions to prevent repeat incidents

Hazard Controls

To implement and maintain required safety controls, steps taken by the Health & Safety Coordinator include:

- Assign **highest priority to safety-related maintenance** work orders
- Oversee **purchase of needed controls** such as equipment/product replacement
- Oversee **purchase of appropriate personal protective equipment**
- Provide **additional employee training** as needed

COMMUNICATING PROGRAMS TO DISTRICT EMPLOYEES

Employees are encouraged to get involved in the district health and safety programs. Health and safety information and training are provided to employees through the district web site, employee handouts, and departmental training sessions.

District employees are encouraged to speak up about their health and safety concerns. If questions or problems cannot be resolved at the building level, the Health & Safety Coordinator will assist in finding a prompt response and resolution.

To improve employee compliance with requirements and participation in safety-related matters, the Environmental Health and Safety Committee members are asked to:

- Post copies of safety meeting minutes
- Ask co-workers for suggestions and input
- Communicate about safety issues and encourage safe behavior

ENFORCING SAFE WORK PRACTICES AND RULES

To ensure safe work practices and rules are consistently enforced, the Health & Safety Coordinator oversees these measures:

- **Enforcing safe work practices** and rules consistently among district employees
- **Retraining employees** if initial training appears to be ineffective
- **Enforcing and documenting progressive discipline** program

ENVIRONMENTAL HEALTH AND SAFETY COMMITTEE

The district has chosen to develop a joint management-labor Environmental Health and Safety Committee. The Environmental Health and Safety Coordinator maintains the records of committee activities, including meeting minutes and documentation of follow-up activities. The Environmental Health and Safety Committee meets every other month during the school year.

The goals of the committee and corresponding activities are as follows:

1. **Goal:** To represent District employees on health and safety matters. To help communicate program details and encourage employee involvement in the District health and safety programs.
Activities:
 - **Obtain commitment from district administration to achieve and maintain committee representation from *each school* as well as *each department***
 - **Encourage regular attendance by representatives for each building**
 - **Communicate committee activities to District employees**
 - **Bring back questions and concerns from co-workers to committee**
 - **Encourage District employees to report health and safety problems and complaints**
2. **Goal:** To reduce work-related accidents and illnesses among District employees, by identifying and analyzing hazards, and recommending control strategies.
Activities:
 - **Discuss trends in accidents/illnesses and analyze OSHA 300 Log Summary of work-related injury and illnesses**
 - **Identify district-wide strategies for prevention and control**
 - **Evaluate successes of prevention and control strategies**
3. **Goal:** To monitor district compliance with applicable health and safety regulations, and encourage enforcement of safe work practices and rules.
Activities:
 - **Discuss results of mock MNOSHA audits, agency inspections, and compliance activities**
 - **Recommend district-wide activities to achieve or maintain compliance**

HEALTH AND SAFETY PROGRAM SUMMARY

1. Art Safety Program

Program Summary:

The District has developed and implemented an Art Safety and Health Program to cover employees in the district middle and high school art classrooms including:

- Ceramics
- Commercial Art
- Metal Working
- Painting and Drawing
- Printmaking
- Sculpture

District Art Teachers are responsible for use and maintenance of the safety equipment and supplies specified in this program. Equipment which is damaged or does not meet OSHA specifications is not to be used. Art teachers are to implement all applicable requirements of this program into their classroom activities. Key areas described in this program include:

- Electrical Safety
- Emergency Responses
- Employee Right-to-Know
- Employee Training
- Equipment Safeguards
- General Safety/Housekeeping
- Personal Protective Equipment
- Required Safety Equipment
- Safe Storage Practices

2. Asbestos Program

Program Summary:

This program covers the White Bear Lake Area School District activities for asbestos management as required under the Environmental Protection Agency (EPA) Asbestos Hazard Emergency Response Act (AHERA), the EPA rules governing disposal of asbestos-containing materials enforced by the Minnesota Pollution Control Agency, and the MNOSHA rules regarding asbestos in buildings.

District 624 has been inspected for asbestos following AHERA requirements. A management plan detailing location, description, periodic inspections, and response actions involving asbestos-containing materials is available upon request at each building and the District Center. Routine maintenance areas are posted with asbestos caution labels, and district employees who may work with or near asbestos are provided with initial and annual training. Employees assigned to handle asbestos are provided with required supplies and protective equipment

3. AWAIR (A Workplace Accident and Injury Reduction) Safety Committee

Program Summary:

The White Bear Lake Area School District has developed and implemented an AWAIR program managed by the Health & Safety Coordinator with oversight by a district-wide Environmental Health and Safety Committee. The committee meets every other month during the school year to address safety and health issues and concerns.

4. Bloodborne Pathogens Program - Exposure Control Plan

Program Summary:

The Health & Safety Coordinator oversees the district program. The program was developed and implemented to protect employees from exposure to Hepatitis B Virus (HBV), the Human Immunodeficiency Virus (HIV) and other bloodborne pathogens.

The program procedures cover the following district employees who have been determined to have potential occupational exposure to bloodborne pathogens because of their assigned job duties:

- **Athletic Coaches**
- **Bus Drivers/Aides**
- **Community Services (Playground)**
- **Custodians, Maintenance & District Driver**
- **Extended Day Staff**
- **School Health Services (nurse, health aides, nurse/paras, etc.)**
- **Special Services (designated job classifications)**

Supervisors for these employees maintain forms for **vaccinations** and **exposure incidents**. Other district employees are provided with awareness training or information on universal precautions, and instructed that their assigned job duties **do not include rendering first aid**.

5. Community Right-to-Know Program

Program Summary:

Under the federal and state Emergency Planning and Community Right-to-Know Acts (Title III), the Minnesota Department of Public Safety Emergency Response Commission (ERC) gathers fees and information related to hazardous materials storage, such as fuel oil. The district must submit annual reports and fees for each district facility storing fuel oil quantities over 10,000 pounds. The annual fee is based on the number of chemicals reported at each facility, and supports the Minnesota emergency one-call spill reporting number and hazardous chemical data management programs.

Currently, annual Turnaround Reports and fees are submitted for fuel oil underground storage tanks at the following locations:

- Bus Garage
- North Campus
- South Campus
- Central
- Oneka Elementary

A copy of the annual Turnaround Report must also be submitted to the local fire department for each of these five locations. The Health & Safety Coordinator oversees submission of the Turnaround Reports and payment of the Hazardous Chemical Inventory Fee for each of the five locations required to report.

6. Compressed Gas Safety Program

Program Summary:

The White Bear Lake Area School District has developed and implemented a written Compressed Gas Safety Program to cover safe handling of compressed gases by district employees. Program procedures emphasize key MNOSHA and DOT requirements for district Custodial/Maintenance Staff handling and transporting compressed gas cylinders. Industrial Technology teachers follow similar procedures described in the Industrial Technology Safety Management Plan. District Science teachers follow the Laboratory Safety - Chemical Hygiene Program.

7. Confined Space Entry Program

Program Summary:

The White Bear Lake Area School District has developed and implemented a written Confined Space Entry Program to describe procedures for entry into and work in confined spaces by district employees. District-owned property has been evaluated to determine which spaces are considered **confined spaces** under the MNOSHA standard. The district has further classified certain confined spaces as **permit-required** confined spaces. Each **permit-required** confined space is to be posted with signs at all access points.

Permit-required confined spaces may only be entered by qualified district or contractor employees under strict compliance with MNOSHA regulations.

Examples of possible confined spaces which have been evaluated in district buildings include:

- Air Handling Units
- Boilers
- Ceiling Crawl Spaces
- Chimney Flues
- Elevator Pits
- Sumps
- Tunnels, Crawl Spaces, Plumbing Access Spaces
- Water Storage Tanks

8. Emergency Action and Fire Prevention Program

Program Summary:

This program covers the White Bear Lake Area School District employee procedures required under MNOSHA Standard 29 CFR 1910.38, *Employee Emergency Plans and Fire Prevention Plans*, and 1910.151, *Medical Services and First Aid*. The program describes procedures to be taken by district staff to ensure district employee safety in case of fire, severe weather, chemical spill or medical emergency.

In addition, consult the district's current Emergency Response Plan, for procedures in place to protect students, staff and the public in specific emergencies.

9. Employee Right-to-Know Program

Program Summary:

The White Bear Lake Area School District Employee Right-to-Know Program covers hazardous chemicals, infectious agents, and harmful physical agents such as heat and noise. The written plan assigns responsibilities for required tasks, including container labeling, maintaining Safety Data Sheets (SDSs), and employee training. Lists of hazardous chemicals are to be maintained for each building, along with the corresponding SDSs. Non-routine tasks must be identified and restricted to designated, trained employees. Procedures are required to communicate hazards and precautions to contractor employees performing work around hazardous chemicals or harmful physical agents in district buildings.

10. Ergonomics Program

Program Summary:

The Minnesota Department of Education has sponsored training workshops for district contact persons to return to the district and become involved in evaluating workstations/equipment for office, food service, and maintenance/custodial personnel. The goal is to reduce or prevent job related musculoskeletal injuries by enabling district representatives to evaluate workstations (or identify workstations in need of evaluation by outside consultants) and recommend expenditure of health and safety funding based on completed assessments.

11. First Aid/CPR/AED Program

Program Summary:

The Health & Safety Coordinator oversees maintenance of required first aid and medical services for district employees. Every school is staffed with a nurse or health aide during school hours. District nurses are all equipped with pagers. Emergency medical services (9-911) can be contacted from all building telephones.

The Health & Safety Coordinator oversees purchase and distribution of first aid kits. First Aid kits are located in the Health, Custodial and Extended Day offices. Trained first aid providers are instructed to inform the site nurse when first aid kit supplies are used and need to be replaced. The

Health & Safety Coordinator supervises annual inspection of the first aid kits to replenish depleted or expired supplies.

12. Food Service Safety Program

Program Summary:

The White Bear Lake Area Schools Food Service Department requires all employees to attend a Sanitation and Food Safety training course provided by the department. All managers must be certified by the American School Food Service Association and must comply with certification regulations. In addition, all Food Service employees are to attend district training in Employee Right-to-Know, Bloodborne Pathogens and Personal Protective Equipment. Each school kitchen is inspected periodically to ensure compliance with food codes and employee health and safety requirements.

13. Hazardous Air Emissions (Boilers) Program

Program Summary:

The district submits an annual Emissions Inventory and air emission fee to the Minnesota Pollution Control Agency (MPCA) for the boiler at South Campus. Fees are calculated based on the total number of tons of sulfur dioxide, nitrogen oxides, volatile organic compounds (VOC), lead (Pb) and particulate matter less than 10 micrometers in diameter (PM10) emitted into the atmosphere.

The Health & Safety Coordinator submits the annual Emissions Inventory and air emission fee for the boiler at South Campus.

14. Hazardous Waste Program

Program Summary:

District Head Custodians are responsible for proper management of hazardous waste for the White Bear Lake Area Schools. Wastes generated at each WBL generator site have been evaluated. Each WBL hazardous waste generator location has been determined to be a Very Small Quantity Generator (VSQG), except Normandy Park. Normandy Park only generates Universal Wastes (such as fluorescent lamps), and is exempt from requirements for licensure and annual reporting.

15. Hearing Conservation Program

Program Summary:

This program covers the White Bear Lake Area School District activities for evaluating employee noise exposures, providing hearing protectors, and implementing a Hearing Conservation Program for designated employees.

Under Minnesota OSHA regulations, employees exposed to noise levels averaging 85 decibels (dBA) or more as an 8-hour time-weighted average must be included in a ***Hearing Conservation Program***. Hearing protection is mandatory for employees exposed to noise levels in excess of 90

dBA as an 8-hour time-weighted average, and engineering or administrative controls must be evaluated.

16. Indoor Air Quality Program

Program Summary:

The White Bear Lake Area School District has developed and implemented an Indoor Air Quality Management Program to monitor and improve air quality in all district buildings. Initial assessments have been performed district-wide, and a program of duct and univent inspections and cleaning has been implemented. The Health & Safety Coordinator works with school administrators and custodians to implement preventive maintenance strategies and communicate with parents and building occupants about indoor air quality issues.

17. Integrated Pest Management Program

Program Summary:

Minnesota state law requires public and non-public K-12 schools to provide notice to parents/guardians and employees if they apply certain pesticides on school property.

A general notice is to be provided to parents/guardians and employees by September 15 of each school year. The White Bear Lake Area School District provides this information to parents/guardians in a fall school mailing. The scheduled service visits for pesticide and herbicide applications are posted on the district web page and are available for review or copying at each school office.

The district's pest control contractor incorporates integrated pest management principles into their pest control services.

18. Laboratory Safety - Chemical Hygiene Program

Program Summary:

The White Bear Lake Area School District has developed and implemented a Laboratory Safety – Chemical Hygiene Plan to cover employee use of hazardous chemicals in laboratories. This plan covers the following district employees whose jobs may include laboratory use of hazardous chemicals:

- **High school chemistry teachers**
- **High school biology teachers**
- **High School physics teachers**
- **Ninth grade physical science teachers**

District Custodians are provided chemical hazard information and training under the district Employee Right-to-Know Program. Laboratory chemicals are to be stored in storage rooms with restricted access.

19. Lead (In Water/Paint) Program

Program Summary:

The White Bear Lake Area School District has developed and implemented a Lead in Water Management Program for district drinking water. Activities covered by this program include:

- Testing of district drinking water taps and fixtures
- Overseeing installation of replacement faucets and hardware to be sure they meet current lead-free criteria
- Maintaining program records
- Training affected employees
- Reviewing management program annually

Water sampling and analysis for lead are performed in district buildings every five years, in accordance with Minnesota Department of Health and federal Environmental Protection Agency guidelines. Records of water sampling results are available from the Health and Safety Coordinator.

The most common lead hazards in schools are lead-based paint, lead dust, and contaminated soil. Federal law now requires that contractors performing renovation, repair and painting projects that disturb lead-based paint in homes, child care facilities, and schools built before 1978 must be certified and follow specific work practices to prevent lead contamination.

20. Lockout/Tagout - Energy Control Program

Program Summary:

The White Bear Lake Area School District has developed and implemented a Hazardous Energy Control (Lockout/Tagout) Program to control hazardous energy during servicing and maintenance of machines and equipment when unexpected energization or start up could cause injury to employees. Mandatory lockout procedures are to be followed to ensure that equipment is **stopped, isolated** from all potentially hazardous energy sources, and **locked out** before employees begin maintenance. Contractors performing work in district buildings must also comply with lockout/tagout procedures.

21. OSHA Inspections, Log of Injuries and Illnesses

Program Summary:

The Health & Safety Coordinator oversees MNOSHA compliance and recordkeeping activities for the district. This program describes how the White Bear Lake Area School District handles MNOSHA inspections, evaluates MNOSHA compliance status, and complies with MNOSHA recordkeeping requirements.

Minnesota OSHA Inspections:

MNOSHA follows a system of inspection priorities, based on whether there is an imminent danger, fatal accident or catastrophe, employee complaint, programmed inspection (special

emphasis program), or follow-up inspection. MNOSHA inspections are conducted without advance notice.

Voluntary “Mock” OSHA Inspections:

The Health & Safety Coordinator oversees routine, voluntary, walk-through inspections throughout the district to raise awareness of potential MNOSHA violations and assess MNOSHA compliance status. Results of these “mock” MNOSHA site inspections are to be provided to designated district employees for follow-up and discussion, including:

- Designated Custodial, Engineering and Maintenance Staff
- Building Managers
- District Safety and Health Committee

Log of Injuries & Illnesses:

The Health & Safety Coordinator compiles, maintains and distributes copies of the required recordkeeping forms for work-related injuries and illnesses.

22. Personal Protective Equipment Program

Program Summary:

The White Bear Lake Area School district has developed and implemented a personal Protective Equipment (PPE) Program to describe district procedures for PPE hazard assessments, equipment selection and employee training. When employees are exposed to bodily hazards, MNOSHA regulations require employers to implement a PPE program to protect employees from hazardous exposures to the eyes and face, head, hands, arms, body or feet to electrical hazards.

23. Playground Safety Program

Program Summary:

The White Bear Lake Area School District conducts annual inspections and repairs to implement Consumer Product Safety Commission (CPSC) recommendations.

24. Radon

Program Summary:

The federal Environmental Protection Agency and the Minnesota Department of Health recommend that schools test for radon. Following these state and federal guidelines the White Bear Lake Area School District periodically tests for radon in rooms at ground level or below for up to 12 months. Initial measurements are usually taken for up to 3-months, in frequently-occupied, ground-contact schools rooms during the coldest months of the heating season. If results exceed 4 picocuries per liter (pCi/L) retests are conducted, followed by diagnostic testing and development of mitigation strategies if necessary.

25. Technology Education

Program Summary:

The White Bear Lake Area School District has developed and implemented a Technology Education Environmental Health and Safety Program to cover employees in all technology education classrooms, including:

- Automotive Labs
- Construction/Woods Labs
- Drafting Labs
- Graphic Arts Labs
- Machine/Metals Labs
- Small Engine Labs
- Technology Labs

The program describes required procedures, equipment, and personal protection for Technology Education teachers. The program covers MNOSHA requirements applicable to district middle school and secondary school technology education classrooms. District custodians provide assistance by managing hazardous wastes, maintaining emergency flushing facilities, and performing assigned housekeeping and equipment maintenance.

26. Underground Storage Tanks/Above Ground Storage Tanks

Program Summary:

The White Bear Lake Area School district has developed and implemented a management program for underground and above ground storage tanks. Key elements of a written tank management program include: assigning a district contact person for each tank, registration with the Minnesota Pollution Control Agency, Fire Marshal review of above ground storage tank installations used for combustible materials, underground storage tank tightness and release detection testing.

27. Miscellaneous Programs

Bleacher safety is another health and safety area covered by district activities. District bleachers are inspected every five years in accordance with Minnesota Statutes, section 326B.112.

GLOSSARY OF TERMS

AHERA - Asbestos Hazard Emergency Response Act
ATDs - Alpha Track Detectors
AWAIR - A Workplace Accident and Injury Reduction Program
BBP - Bloodborne Pathogens
CPSC - Consumer Product Safety Commission
DOT - Department of Transportation
EPA - Environmental Protection Agency
ERTK - Employee Right-to-Know
IPM - Integrated Pest Management
JHA - Job Hazard Analysis
LOTO - Lockout and Tagout (for hazardous energy control)
MDE - Minnesota Department of Education
MDH - Minnesota Department of Health
MNOSHA - Minnesota Occupational Safety and Health Program
MPCA - Minnesota Pollution Control Agency
pCi/L - picocuries per liter
ppb - parts per billion
PPE - Personal Protective Equipment
SDSs - Safety Data Sheets
USTs/ASTs - Underground and Aboveground Storage Tanks