Public Safety & Compliance

Quarterly Compliance Newsletter

October 2018

Did You Know

OSHA Consultation Visits have shown to be a valuable tool to determine where your campus is at in terms of health and safety compliance. They have provided an educational training opportunity for faculty and staff who have participated in the visits.

We want to encourage all of the system campuses to participate in our Alliance with OSHA and schedule a Consultation visit. They will only review those areas of the campus that you want them to review. You can stop the visit at any time when you think you have reached your workload or budgetary limits. Many campuses have done multiple visits so that the workload and possible repair costs are spread out.

If you are interested in a visit please contact me at:
donald.beckering@minnstate.edu or at 651-201-1790.

Third Quarter Consultation Visits

We conducted 2 OSHA Consultation visits for the third quarter. 14 issues were discovered. Here is the summary:

OSHA Consultation Visit Summary:

1. All Place(s) of employment, passageways, storerooms, service rooms, and walking- working surfaces shall be kept clean and orderly, or in a sanitary condition. 1910.22(a)(1) (The storage room had become a catch all for material)
2. Exit routes were not kept free of explosives or highly flammable furnishings or other decorations. 1910.37(a)(1) (A flammable storage cabinet was stored under the stairs and the stairs are part of the emergency exit route) **Multiple locations on the campus.**

3. The in-plant handling, storage, and utilization of all compressed gases in cylinders, portable tanks, rail tank cars, or motor vehicle cargo tanks was not in accordance with Compressed Gas Association Pamphlet P-1-1965, which is incorporated by reference as specified in Sec. 1910.6. 1910.101(b) (Freon was being stored in a flammable storage cabinet and compressed gases are not be stored near flammables) **Multiple locations on the campus.**
4. Approved containers or portable tanks were not used for the storage of flammable liquids. 1910.106(d)(2)(i) (Metal containers that were inside the flammable cabinet were disintegrating because there were corrosives stored in the cabinet, corrosive spills in a cabinet were leaking out of the bottom of the cabinet, flammable cabinet would not latch and remain closed)
5. Where employees were exposed to injurious materials, suitable facilities for quick drenching or flushing of the eyes were not provided within the work area for immediate use. 1910.151(c) (An old eyewash had been taken out of service and a new one installed in another location. Signage by the old eyewash needs to be removed)
6. The distance between the abrasive wheel and the adjustable tongue guard at the top exceeded one fourth inch and the tool rest exceeded one eighth inch. 1910.215 (b)(9) (Bench grinder out of adjustment)
7. Working space about electric equipment rated 600 volts, nominal, or less was used for storage. 1910.303(g)(1)(ii) (Electrical power panel were blocked by miscellaneous storage)
8. Unused openings in boxes, cabinets, or fittings were not effectively close. 1910.305 (b)(1)(ii) (The knockout holes on the shut off switch were open and needed to be closed)
9. Fixtures, lamp holders, lamps, rosettes, and receptacles located within 8 feet of the floor had live parts exposed to employee contact. 1910.305(j)(1)(i) (Storage and work space were too close to unguarded florescent bulbs)
10. Exposed, friable asbestos-containing materials were not repaired, replaced, removed, enclosed, or encapsulated. 5205.0660 subp. 3 (Exposed, friable asbestos-containing materials were not repaired, replaced, removed, enclosed, or encapsulated. The insulation on the door of the boiler door cover plate was in poor condition and the employer was not sure if the insulation contained asbestos)

The Hazardous Waste Electronic Manifest (E-Manifest) System

The Environmental Protection Agency (EPA) transition from hard copy manifests to totally electronic manifests began July 1, 2018. As with any new venture like this, EPA has admittedly stumbled in the rollout of this program. However, they assert that by the end of calendar year 2018, the E-Manifest system will be fully operational.

So what does this mean for Minnesota, and specifically Minnesota State colleges and universities? The answer is simple, by the end of the year all of our campuses must ensure their campus specific Hazardous Waste Identification numbers (HWID #'s) are registered with the E-Manifest system. Luckily for all of you, after some searching, it has been determined that all MinnState HWID #'s are active on the EPA site.

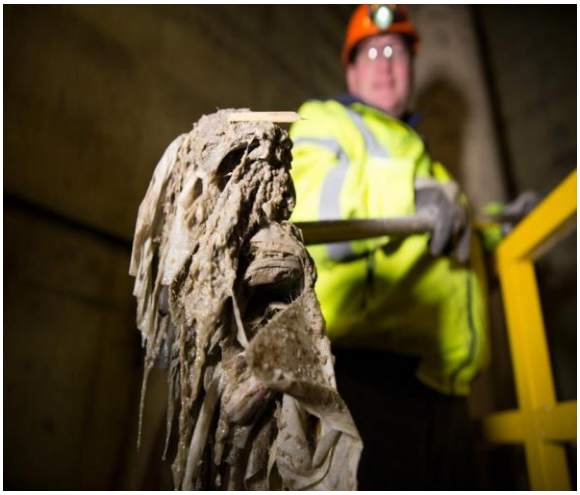
What the campuses must do now is get registered to actively access the site. As the screens automatically scroll, wait until you see the Access e-Manifest screen. Click on the Access e-Manifest tab then sign-in or register. Once you log-in you will be on the My Sites page. Click "Add Existing Site" tab and enter your campus specific HWID # in the Site ID box. Use capital letters and no spaces. Click search, then check the select box and then the "Request Access" tab. Three Modules are shown, with corresponding permission levels. Under "Site Management" select Active. Since none of our campuses are required to submit Biennial Reports you can ignore this module. For the "e-Manifest" Module, select the Certifier Tab if you

are the person assigned to review and sign manifests. Otherwise, select the Viewer tab if you are monitoring the manifests. Contractors will be permitted to prepare the manifests; however, if you have the responsibility to prepare manifests, you can select that permission level request. Click the "Send Request" tab, and you will shortly get a confirmation email from EPA.

If you have issues please contact Ken Auer, 651-201-1667 or Kenneth.auer@minnstate.edu

(Information was sourced from EPA website https://www.epa.gov/e-manifest)

Flushable Wipes



Many manufacturers of pre-wetted packaged wipes, sold for a variety of uses, often label these wipes as "flushable". These manufacturers claim that laboratory testing has shown the wipes will break apart, like toilet paper, once introduced into sewer systems. Unfortunately, what the manufacturers failed to mention or to factor into their testing, was the amount of time required in the laboratory to fully break down these so-called flushable wipes.

Municipal waste water treatment plants are struggling with the reality of the situation. Instead of disintegrating like toilet paper once flushed into the sewer system, these wipes have been found to only partially break down, if they break down at all. The wipes then combine with other sewer waste, and begin to collect on grates, screens, and pump impellers into what are called "Fatbergs". Pictured above are some of these fatbergs.

At a great cost to the local municipalities, these fatbergs burn out pumps, plug pipes and cause tremendous maintenance issues. Pumps must be pulled, cleaned, repaired or replaced on an ongoing basis. Manual removal of clogs is a constant maintenance issue. In one extreme case, the city of Charleston, South Carolina was forced to send divers through 80 feet of raw sewage to manually what they termed a "giant hairy fatberg".

https://nypost.com/2018/10/17/divers-swim-through-90-feet-of-raw-sewage-to-unclog-giant-hairy-fatberg/

Needless to say, these ongoing removal costs and publicity doesn't bode well for the future of "flushable wipes". Many municipalities are actively pushing to force manufacturers of the wipes to remove the word flushable from their products. These municipalities are also working within their communities to educate the public about the problems causing by flushable wipes.

Minnesota State campuses should keep all this in mind when purchasing cleaning supplies or baby wipes for use on the campus. No sense to compound the problem by allowing these wipes to be flushed, and instead should collect them with regular garbage, or provide separate collection containers for sanitary wipes. Just another problem to add to the long list of issues campus facility and environmental health and safety staff must deal with.

(Information was sourced from Minnesota Pollution Control Agency (MPCA) website).

FY 2019 Safety Perception Survey

FY 2018 will soon be coming to an end. FY 2019 will be starting up and will be the third year in the State of Minnesota's Employee Safety Perception Project. Hopefully all of you have been working on your campus goals in preparation for the 2019 follow up survey.

Safety Perception Survey

In October 2017 you were sent your college or university specific Safety Perception Survey Report along with an overview of what the state project was trying to accomplish and next steps. Hopefully you have been able to meet with your administration and safety committee to start to put together college/university specific goals based on the information in your report. These goals should focus on the open ended questions in your report. Toward the end of FY 2019 another survey will be taken. We are asking each campus to send us their campus specific goals.

If you have any questions please contact Amy Kockelman, System Workers Compensation Specialist at 651-201-1595 or at amy.kockelman@minnstate.edu or Anita Mujumdar at 651-201-1793 or at anita.mujumdar@minnstate.edu

We have established the following system goals:

1. **Increase system wide employee participation in the 2019 survey.**
   In order for us to accomplish this each campus will need to establish a strong communication process that will ensure every campus employee will know how to access and fill out the survey. To help the Department of Administration's project coordinator have better communications with campuses we need to have the name and contact information for each college/university's survey coordinator. This coordinator will ensure that once the survey is launched that each employee is notified and given directions on how to access and fill out the survey. Please send your coordinator contact information to Anita Mujumdar, anita.mujumdar@minnstate.edu.

2. **FY 2018 and FY 2019 Campus Goals.**
   Each campus was sent their campus specific results from the survey done in 2017. Campuses were asked to develop campus specific goals for FY 2018. 16 campuses sent their goals to us for review. Hopefully those that didn't send their campus goals to us established goals and worked on them throughout 2018. It is time to review the progress on those goals and determine if they need to be extended into 2019 or if goals have been completed, new goals are developed. For any campuses that may need assistance in their 2018 goals review or establishing new 2019 goals, Anita has taken every campus' specific report and broken it down into a useable analysis matrix.

I encourage you to contact her to get a copy of the matrix and schedule some time with her to go through the findings. Setting doable, employee suggested goals will go a long way to increasing campus employee participation.

3. **Implement Operating Instruction 5.24.7-Safety Committees, using the Operating Instruction Technical Manual.**
   The number one issue from the 2017 survey was the effectiveness of our safety committees. To help campuses with this issue we developed an Operating Instruction which lays out what campuses need to do in order to be compliant with state statute and union contracts. The companion technical manual helps the safety committee coordinator and the safety committee to understand its duties and its findings/activities are effectively communicated out to the campus community. We will be reviewing FY 2019 meeting minutes and making campus follow up calls to ensure that campuses are implementing the Operating Instruction. For more information or implementation assistance contact Anita Mujumdar, anita.mujumdar@minnstate.edu.

Safety is part of every system employee's daily activities. The major goal of this state project is to improve the safety culture in every state agency. Minnesota State Colleges and Universities has a good track record for safety compliance. But even good track records can be improved upon. Let's work hard to develop sound project goals that will impact on your campus safety culture and ones that will show positive results in the 2019 follow up survey.

Instilling a Positive Safety Culture at Minnesota State Campuses

What is 'Safety Culture'?
Every organization has a culture: a set of written and unwritten rules and assumptions that define and determine how things are done. A safety culture is not a policy, program or procedure. A safety culture is a common set of beliefs, assumptions and normative behaviors that actively influence how employees think and act with regard to safety issues.

Why is having a Positive Safety Work Culture Important for Minnesota State?
Instilling a positive safety culture increases regulatory compliance, reduces employee accidents, improves morale, fosters employee health and safety well-being while significantly reducing short term and long term costs for the system.

How will establishing a Positive Safety Culture on Campus Influence Safety Administrators' Job Responsibilities?
The job responsibilities of Safety Administrators include developing safety programs, procedures, addressing hazard and incident reports, responding to technical and non-technical employee questions, presentations to staff and management, employee safety training, etc. To influence positive safety culture at the campus, merely training employees to work safely is unlikely to be sufficient. Safety staff may have to provide forms of motivation and publicity to encourage employees to take responsibility for their own health and safety and that of others. The methods will be needed to create an atmosphere that promotes safe behavior, reminds and reinforces the benefits for always working safely. The initial time commitment invested by campus safety staff in enhancing safety culture by at campus is likely to be rewarded later by

- Reduced employee injuries, illnesses and incidents
- Reduced workers compensation costs

- Improved employee morale and productivity

Additionally campus safety staff is less likely to spend time enforcing employee safety compliance once a positive safety culture is established. Enhancing safety culture at Minnesota State campuses is likely to benefit campuses as well as the system.

Safety Perception Survey
In the survey results report, lack of effective communication has emerged as an area of focus for most of the Minnesota State campuses. Survey scores greater than 4.0 reflect a positive safety culture. Questions regarding communications have low average scores for Minnesota State system reflecting employee perception of ineffective communication from the management.

Question	Average Score
3. Leaders in this company solicit safety ideas from employees	3.56
4. Leaders use safety suggestions made by employees	3.57
5. Adequate company information is shared with employees	3.64
28. My company's safety goals and results are clearly communicated.	3.62

Compare the scores for your campus with the System average for the communication questions. Implement strategies that would improve two-way communications in your campus.

Communication
Two-way communication is vital to achieve a positive safety work culture. Within open and two-way communication:

- Management provides employees with relevant information on hazards and risks associated with the organization's operations to build understanding on how to work safely
- Management listens to employee concerns
- Appropriate actions are implemented
- Results communicated back to the employees.

Employees will contribute more effectively in an environment that provides a framework for consultation and communication. Employees are more likely to report near misses if the campus has a no-blame culture.

Culture Action: Improve Communications with the Employees – Addressing Barriers
Barriers to effective communications include:

- Lack of information or knowledge
- Lack of attention to details
- Not explaining priorities or goals clearly
- Selective listening
- Lack of Empathy
- Self-image

- Status prejudice
- Accents
- Differing perceptions of risk
- Failure to explore alternative solutions
- Preconceived ideas about options
- Poor judgement
- Losing patience by allowing decisions to become emotional.

Barrier can also occur in the form of communication. For example, extensive use of email may desensitize some employees to safety messages or information.

Did You Know

The Campus Safety Program and Workers Compensation must work together in order to reduce the number of campus injuries and the Workers Compensation costs. For that reason we will be doing a quarterly summary of system claims data and hopefully some best practices to follow to minimize them from occurring.
If you have any questions please contact Amy Kockelman, System Workers Compensation Specialist at 651-201-1595 or at amy.kockelman@minnstate.edu

Quarterly Workers Compensation Summary:

Last Quarter Summary (July - September 2018):

Includes incident only, accepted and denied claims.

89 – Total number of incidents/claims
29 – Incident only
12 – Lost time claims
48 – Medical only claims

If you would like your specific Workers Compensation campus data please contact Amy!!

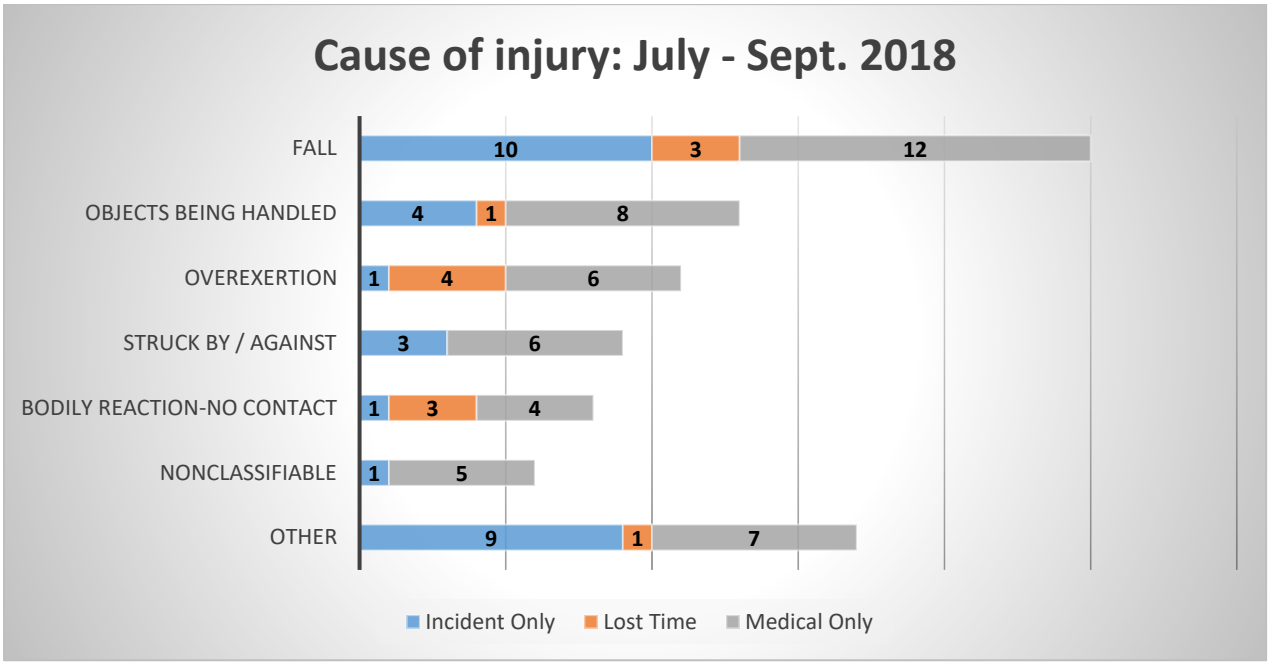
FY 19 Summary (includes incident only, accepted and denied claims):

	Q1	Q2	Q3	Q4	YTD
Incident Only	29				
Lost Time	12				
Medical Only	48				
Total	89				

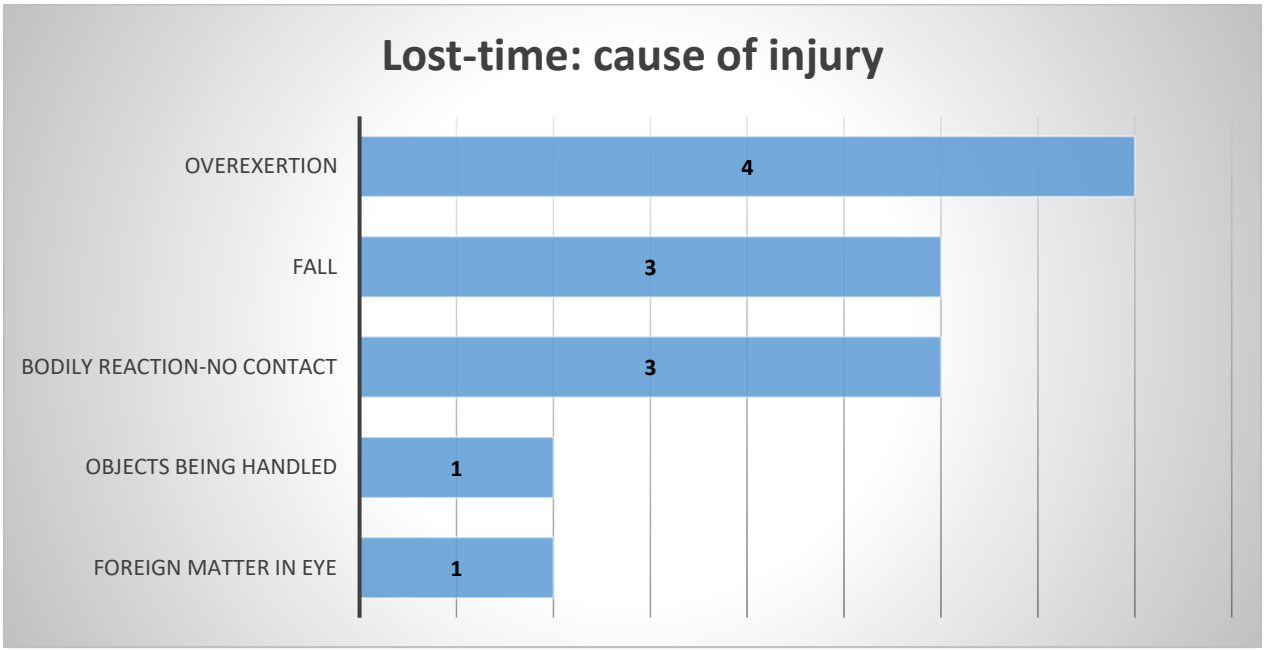
FY18 Summary (includes incident only and denied claims):

	Q1	Q2	Q3	Q4	YTD
Incident Only	44	50	74	29	197
Lost Time	8	17	19	14	58
Medical Only	45	56	68	67	236
Total	97	123	161	110	491

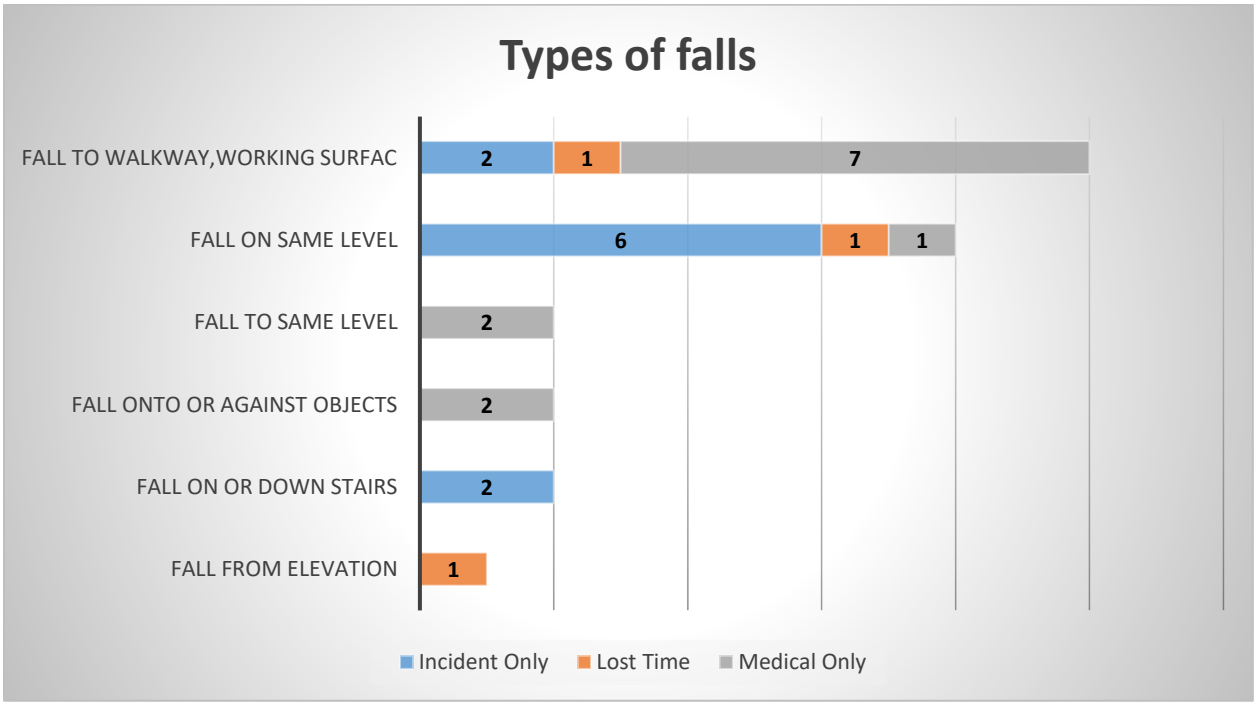
The primary cause of injury continues to be falls:



Overexertion injuries were the leading cause of lost work time for new injuries:



Fall Injuries:



The injuries by occupation has remained fairly constant. General Maintenance Workers and Student Workers are the most frequently injured population.