



State of New Jersey

DEPARTMENT OF HEALTH AND SENIOR SERVICES

PO BOX 360
TRENTON, N.J. 08625-0360

JON S. CORZINE
Governor

www.nj.gov/health

FRED M. JACOBS, M.D., J.D.
Commissioner

July 6, 2007

Jan Furman, Superintendent
Northern Valley Regional Board of Education
162 Knickerbocker Road
Demarest, New Jersey 07627

RE: PEOSH Consultation
St. Anthony's School

Dear Superintendent Furman,

The New Jersey Public Employees Occupational Safety and Health (PEOSH) Program completed a consultation at the St. Anthony's School located at 191 Walnut Street, Northvale. The consultation focused on compliance with the PEOSH Indoor Air Quality Standard and the Hazard Communication Standard. As a part of this consultation, the District's compliance with Reporting and Recording Occupational Injuries and Illnesses was also evaluated.

"Hazard" is the term used to identify conditions and programs not currently in compliance with PEOSH standards. Recommendations are provided in this report to assist the school and district in correcting the hazards and taking steps to provide optimum indoor air quality.

The list of hazards (Appendix A) must be posted in a prominent location where it is readily observable by all employees for 3 working days or until the hazards are corrected. Please complete and return Appendix A of this report by August 17, 2007 in order to document correction of hazards. Rights of public sector employers following a consultation visit are listed on the following page. If you have questions or need additional information concerning this report or other potential hazards, please feel free to contact me at 609-943-3383.

Sincerely,

Karen Worthington, MS, RN, COHN-S
Research Scientist, PEOSH

c: R. Jacobus, Business Administrator, NVSD
J. McGuire, NVEA President

Employer's Rights

In Federally Funded State OSHA Consultation Projects

Besides the obligations stated in the letter above, the employer retains the following rights during and after a consultation visit:

1. Modifying the Scope of the Visit or Terminating the Service

The employer has the right to modify the scope of the visit or terminate participation in the visit at any time, including termination of the hazard survey before its completion. The employer is responsible for correcting any serious hazards identified up to the point of termination and, except in situations where imminent danger or serious hazards are not corrected as agreed upon, the employer's name and results of the on-site visit will remain confidential from State or Federal enforcement.

2. Correction Schedule and Report Findings

The employer has the right to disagree with the correction schedules and may, within 15 working days of receipt of the Written Report to the Employer, appeal to the Consultation Project Manager for amendment of the correction date(s) or any other substantive findings of the Report. Disagreement over or amendment of the correction schedule or report findings does not relieve the employer of the responsibility to correct serious hazards identified.

3. Informing Enforcement

If an enforcement inspection occurs after the conclusion of the consultation visit in progress, the employer is not required to inform the Compliance Safety and Health Officer of the consultation onsite visit or furnish copy of the results, except to the extent that disclosure of information contained in such a report is required by 29 CFR 1910.1020 (Access to employee exposure and medical records) or other standards.

4. Private Discussion with the Consultant

The employer has the right to request a private meeting with the consultant to discuss matters that he or she may wish not to discuss in the presence of the employee representative.

Excerpted from: OSHA Consultation Policies and Procedures Manual, Directive Number TED 3.6, Ch. 2, Sec. II L.

Consultation Report

EMPLOYER: Northern Valley Regional School District

SITE: Saint Anthony's School
191 Walnut Street
Northvale, New Jersey 07647

VISIT DATE: July 3, 2007

VISIT NUMBER: 503212896

CONSULTANT: Karen Worthington, MS, RN, COHN-S
Research Scientist
New Jersey Department of Health and Senior Services
Public Employees Occupational Safety and Health Program

SCOPE OF SURVEY:

This consultation was conducted in response to a request from the Northern Valley Regional School District to the Public Employees Occupational Safety and Health (PEOSH) Program. The purpose of this consultation was to evaluate compliance with the PEOSH Indoor Air Quality Standard and with the Hazard Communication Standard and perform a walkthrough survey of the school to identify any potential for occupational exposures. The visit also included a review of compliance with the PEOSH standard for Recording and Reporting of Occupational Injuries and Illnesses.

The PEOSH materials listed below were provided to the school district:

- Indoor Air Quality Standard
- Indoor Air Quality Inspection Checklist
- Bulletin: Bioaerosols
- Bulletin: Mold in the Workplace Prevention and Control
- Bulletin: Common Hazards Found in Public Schools
- Bulletin: Renovation & Construction in Schools: Controlling Health and Safety Hazards
- NJ Department of Health and Senior Services web pages on Healthy School Facility Environments
- NJ Department of Labor and Workplace Development Guidance for Recording and Reporting of Occupational Injuries and Illnesses

BACKGROUND:

On June 19, 2007, the Health Officer in Northvale contacted PEOSH for assistance in investigating employee concerns of a possible cluster of health effects among the birth children of teachers who work at Saint Anthony's School. A formal request for a PEOSH consultation

was submitted by the Superintendent of the School District. PEOSH performed an on-site consultation at the St. Anthony's School on July 3, 2007 focusing on potential air-contaminants or chemical hazards to which teachers may have exposure, particularly in Classroom 5. PEOSH met with the District's Business Administrator and the Supervisor of Buildings and Grounds. A phone interview with an employee representative, the Northern Valley Education Association President, was conducted on July 6, 2007.

The St. Anthony's School building is leased by the Northern Valley Regional School District from the Diocese of Newark and houses the district's educational programs for children with special needs. Classes are in session for 11 months of the year. Eighty employees work in the building including 10 teachers, 55 teachers' aides and 14 therapists. After teachers voiced concerns about the school building being a potential source of exposure, the district temporarily relocated students and teachers to another district site. On the day of the PEOSH consultation visit, one office staff person was working in the building.

The St. Anthony's School building is a brick and cinderblock structure that was constructed in 1957 and consists of two wings of classrooms, a gymnasium, several offices and a boiler room. The school is located in a residential neighborhood. The entire block on which the school is located is paved with asphalt which extends from the brick walls of the school to the street.

The school is heated by perimeter radiant heat. There is no ducted heating, ventilation or air-conditioning system present. Windows provide natural ventilation. Windows are operable. The school district installed window air-conditioning units in each classroom for use during hot weather. There are tile floors throughout the school. Small area carpets are present in some classrooms. The tile floors are well maintained. No friable areas were noted.

FINDINGS AND DISCUSSION:

Recording and Reporting of Occupational Injuries and Illnesses (29 CFR 1904)

There is a system in place in the district for employees to report and obtain treatment for any injuries and illnesses that they believe to be work-related. Employees are sent to a local occupational health provider or emergency room for treatment. PEOSH recommends that employees be instructed to report any work-related health symptoms to one person (e.g., the school nurse) so that they can be accurately assessed and investigated when indicated.

The district's NJOSH 300 Logs were requested. Although the district maintains first reports of injury and has completed periodic Surveys of Work-Related Injury and Illness as requested by the New Jersey Department of Labor and Workforce Development (DOLWD), they are not routinely maintaining the NJOSH 300 Log as required by the standard (See hazard #1, page 5). Enclosed is the latest guidance from the DOLWD to assist the district in implanting this PEOSH-required reporting. A copy of the standard is also enclosed. The reporting and recording requirements for PEOSH recordkeeping differ from the state workers compensation system so entries in the two systems will differ.

In addition to maintaining the NJOSH 300 Log, the PEOSH Recordkeeping Standard requires that NJ OSH Form 300 A, the Summary of Work-Related Injury and Illnesses, be completed annually and signed by the highest ranking official in the District. The summary must be posted in the place where notices to employees are customarily posted from February 1 to April 30th.

In lieu of the NJOSH 300 Log, the district provided the listing of the past year's workers' compensation claims for PEOSH to review for indoor air quality or chemical-related illnesses. Nearly all claims were reports of injuries, the majority of which stemmed from working with students.

Indoor Air Quality

Designated Person

Currently, the District's Business Administrator is designated to handle compliance with the NJ Indoor Air Quality Standard and other health and safety issues. Several other staff members share responsibility for addressing indoor air quality concerns, including the District's Supervisor of Buildings and Grounds and other school maintenance personnel.

Record Review

HVAC system preventive maintenance

Because the school uses operable windows to provide natural ventilation and there is no mechanical heating, ventilation and air-conditioning (HVAC) system present, the preventive maintenance requirements of the PEOSH Indoor Air Quality Standard do not apply at Saint Anthony's School. PEOSH recommends that window air-conditioning units be cleaned and serviced according to the manufacturer's specifications.

Walkthrough of School

Renovations and Remodeling

No construction is occurring at present. School officials report that they schedule construction or renovation projects off hours or during holidays or breaks. The PEOSH Indoor Air Quality Standard requires notification and protection of employees during construction activities. Employers must give employees 24 hours advanced notice if air contaminants may be introduced into their work area. Renovation areas in occupied buildings need to be isolated and dust and debris confined to the construction area.

Microbial Growth

During the walkthrough of the school, no visible mold growth was observed. If mold growth is observed, all growth found on hard surfaces should be cleaned by damp wiping with water and mild detergent and allowing to dry; scrub if necessary. Cleaning should be performed routinely in areas where there is a recurring mold and mildew problem. If mold growth or water damage ever occurs on *porous* building materials, corrective measures also need to be taken to remove and replace moldy materials and completely dry or replace wet porous materials within 48 hours. Additional guidance on mold cleanup procedures can be found in the Environmental Protection Agency's guidelines entitled "Mold Remediation in Schools and Commercial Buildings" at: <http://www.epa.gov/iaq/molds/images/moldremediation.pdf>.

Water Intrusion

No signs of water intrusion were observed during the walkthrough. The Supervisor of Buildings and Grounds reports that the District strives to perform ongoing preventive maintenance and replacements of roofs to avert this problem. PEOSH recognizes the intrusion of water into the indoor environment as the single most important cause of microbial contamination. The necessary conditions required to produce aerosolization of an organism or its parts are the presence of a reservoir (wet porous ceiling tiles, wet carpeting, wet HVAC filters), amplification (increase in numbers or concentration), and dissemination. Due to the potential for the presence of bioaerosols, all water-damaged ceiling tiles or plaster should be replaced. Moist conditions provide an ideal environment for microbial growth that could lead to possible health problems. The causes of the water leaks should be determined and the necessary steps should be taken to abate these problems.

NOTE: Recent revisions to the PEOSH Indoor Air Quality Standard make the presence of wet ceiling tiles and/or other wet porous materials a violation of the Standard.

HVAC System Operation

Because no HVAC system is present, air-quality parameters used by PEOSH to assess mechanical ventilation system operation were not measured.

Observations during walkthrough survey

During the walkthrough survey, floors and surfaces were noted to be clean. No odors were noted inside or outside of the school. A residential neighborhood surrounds the school building. Vehicles were parked outside of classrooms at the time of the walkthrough but vehicle idling and exhaust have not been reported as a problem according to the school personnel on the walkthrough. Buses drop off and pick up students at the doorways at the end of the hall. There was no evidence of pests in the school. There were no opened containers of food in the classrooms and food is not prepared or served in the school.

Chemical products present in school consist mostly of cleaning products. These products are stored in the custodial closets on each wing and are included in the District's Hazard Communication Program. These products are mixed and used by custodial staff only.

Hazard Communication Standard

The school district's written hazard communication plan was reviewed and was found to contain the components required by PEOSH. A consultant assists the district with the annual chemical survey, reporting and labeling requirements and hazard communication training. The Right to Know Central File containing MSDS sheets and Hazardous Substance Fact Sheets for chemicals used at St. Anthony's School is maintained on-site. There is a clear procedure in the District for obtaining MSDS sheets, filing them and re-ordering the identical products.

Most of the chemicals present at St. Anthony's school are cleaning chemicals which are stored and dispensed by the custodial staff. Teachers, aides and therapists at St. Anthony's are not expected to mix or use these products and therefore are not considered to be exposed to these products during the course of their routine work. Appropriate personal protective equipment is available to custodial staff.

During the walkthrough of the classrooms, some spray air-fresheners were noted in closets. The District should discourage use of any chemical in the school other than those specifically approved for use by the District and included in the Hazard Communication Program. This includes cleaning chemicals and air fresheners.

REPORT OF HAZARDS FOUND:

The following list of hazards identifies the areas where the Northern Valley Regional School District is currently out of compliance with the relevant PEOSH standards at the St. Anthony's site and provides the recommended actions for correcting these hazards.

- 1. PEOSH Standard:** **Recording and Reporting Occupational Injuries and Illnesses**
N.J.A.C. 12:100-7.8(a) Employee Information and Training
Type of Hazard: Other than serious
Condition: A Log of all Work-Related Injuries and Illnesses (NJOSH Form 300), and/or the Summary of Work-Related Injuries and Illnesses, (NJOSH Form 300-A), and/or the Injury and Illness Incident Report (NJOSH Form 301) or equivalent forms were not kept by the establishment.
Recommendation: Maintain NJOSH 300 Log, Summary (Form 300-A) and the Injury and Illness Incident Report (NJOSH Form 301) or it's equivalent.

RECOMMENDATIONS:

1. Employees should be instructed to report any work-related health symptoms to one person (e.g., the school nurse) so that they can be accurately assessed and investigated when indicated.
2. The District should discourage use of any chemical in the school other than those specifically approved for use by the District. This includes cleaning chemicals and products used to freshen the air.

Appendix A

Employer Report of Actions Taken

Please use the attached forms to provide documentation of the actions taken to correct hazards identified during the consultation visit. You are asked to return the forms by:

August 17, 2007

Fax or mail to:

Karen Worthington
PEOSH Consultation Program
New Jersey Department of Health & Senior Services
PO Box 360
Trenton, New Jersey 08625-0360

Fax #: 609-984-2779
Phone: 609-943-3383

If you would like the forms provided electronically for you to complete, please send an e-mail to:

Karen.worthington@doh.state.nj.us

Appendix C

Employer Report of Actions Taken

Hazard described in PEOSH Consultation report	
1.	<p>PEOSH Standard: Recording and Reporting Occupational Injuries and Illnesses</p> <p>Training N.J.A.C. 12:100-7.8(a) Employee Information and</p> <p>Type of Hazard: Other than serious</p> <p>Condition: A Log of all Work-Related Injuries and Illnesses (NJOSH Form 300), and/or the Summary of Work-Related Injuries and Illnesses, (NJOSH Form 300-A), and/or the Injury and Illness Incident Report (NJOSH Form 301) or equivalent forms were not kept by the establishment.</p> <p>Recommendation: Maintain NJOSH 300 Log, Summary (Form 300-A) and the Injury and Illness Incident Report (NJOSH Form 301) or it's equivalent.</p>
Corrective Actions Taken	
<p>Please attach completed NJ OSH 300 Log for past school year.</p>	