

**MILLE LACS BAND OF OJIBWE  
HEALTH AND HUMAN SERVICES POLICY & PROCEDURE**

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**Department:** Behavioral Health-Four Winds Lodge

**Policy Number:** HHS-BH-FW 4748

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**Policy Title:** Hazardous Materials and Wastes Management Plan

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**Attachments:**

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**Revision History:**

**Revised by/Date:** Hannah Schiemann 4/2018

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**Approved by:**

**Date:**

Lindsay Misquadace-Berg, Treatment Director (Interim)



7-23-19

**Approved by:**

**Date:**

Nicole Anderson, Commissioner of HHS



7-26-2019

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**POLICY STATEMENT:**

The Hazardous Materials and Wastes Plan addresses chemicals, medical sharps, regulated medical wastes, pharmaceuticals and gases and vapors posing hazards to personnel or the environment. The Hazardous Materials and Wastes Plan are implemented in all areas.

**PURPOSE:**

The mission of Four Winds Lodge is working with others; we provide traditional and innovative substance abuse services and assist people in improving their quality of life. Consistent with this mission, Four Winds has established and provides ongoing support for the Hazardous Materials and Wastes Program described in this plan.

The purpose of the Hazardous Materials and Wastes Plan is to identify and manage materials known to have the potential to harm humans or the environment. The plan includes processes designed to minimize the risk of harm. The processes include education, procedures for safe use, storage and disposal, and management of spills or exposures.

**PROCEDURE:**

**I. FUNDAMENTALS**

- a) The scope of the Hazardous Materials and Wastes Plan is determined by the materials in use and the wastes generated by FOUR WINDS LODGE.
- b) Hazards associated with materials and wastes are defined by law or regulation and are identified in Safety Data Sheets and Globally Harmonized System labeling.
- c) Safe use of hazardous materials and handling of wastes requires participation by supervisors and other appropriate staff in the design and implementation of all parts of the plan.

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- d) Protection from hazards requires all employees who use or are exposed to hazardous materials and wastes to become educated to the nature of the hazards and to use equipment provided for safe use and handling when working with or around hazardous materials and wastes.

**II. OBJECTIVES**

- a) Identify and inventory those chemicals, pharmaceuticals, sharps, gases, vapors or biological materials that may pose a risk to employees, clients, visitors or the environment.
- b) Obtain Safety Data Sheets for hazardous materials.
- c) Identify the areas where hazardous materials or wastes are used, stored and disposed of.
- d) Provide training for employees who handle or use hazardous materials or wastes.
- e) Identify locations where hazardous, infectious and biological wastes are generated and provide appropriate collection containers and storage areas.
- f) Segregate hazardous, infectious and biological wastes at the point of generation and during storage.
- g) Maintain required records, manifests, and other documentation pertaining to activities of the program.
- h) Monitor or measure employee exposure levels required by regulation.
- i) Conduct an annual evaluation of the objectives, scope, performance, and effectiveness of the program and report the findings to Leadership.

**III. ORGANIZATION AND RESPONSIBILITY**

- a) The supervisors of Four Winds and Leadership receive regular reports of the current status of the Hazardous Materials and Wastes Plan through the Safety Committee. The supervisors and the Leadership review reports and, as necessary, communicate concerns about key issues and regulatory compliance to the Quality Assurance/ Quality Improvement Safety Program Manager. The supervisors and the Leadership collaborate with the CD Leadership Group to establish operating and capital budgets for the Hazardous Materials and Wastes Plan.
- b) The supervisors of Four Winds are responsible for orienting new employees to their work area and, as appropriate, to job and task specific uses of hazardous material or wastes. When requested, the Quality Assurance/ Quality Improvement Safety Program Manager will provide assistance.

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- c) Individual employees are responsible for learning and following job and task specific procedures for safe handling and use of hazardous materials and wastes.

**IV. PROCESSES OF THE HAZARDOUS MATERIALS AND WASTES PLAN**

a) Selection

- i) The supervisors are responsible for managing the safe storage, handling, use, and disposal of hazardous materials and wastes. Staff is responsible for evaluating Safety Data Sheets for hazards before purchase of supplies. The supervisors are responsible for working with the Quality Assurance/ Quality Improvement Safety Program Manager to develop procedures for handling of hazardous materials.
- ii) Staff is responsible for managing the safe storage and handling of hazardous, infectious or biological waste.

b) Waste Handling

- i) Supervisors, Quality Assurance/ Quality Improvement Safety Program Manager and the Infection Control Committee collaborate to determine procedures for handling hazardous and infectious wastes. The supervisors are responsible for enforcing these procedures.
- ii) Four Winds maintains a secured area where waste is held until transport by contractor.

c) Space Management

- i) The Leadership is responsible for managing the program for providing appropriate space for handling and storage of hazardous and infectious wastes.
- ii) The appropriateness of space for handling and storage of hazardous and infectious materials and wastes is also evaluated as part of the hazard surveillance program. The intent of evaluating these issues during hazard surveillance is to determine if current conditions and practices support the safe handling and storage of these items.
- iii) Leadership is responsible for initiating action on findings related to the appropriate use of handling and storage spaces in their areas of responsibility.
- iv) The supervisors provide the Safety Committee with reports of findings and follow-up action related to appropriate use of space as determined through the hazard surveillance program.

d) Incident Reporting

- i) The Hazardous Materials and Wastes Program utilize the Incident Report Form to document different types of incidents. The individual discovering the incident completes the Incident Report Form per the HHS Incident Reporting policy.



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- ii) The supervisors, Quality Assurance/ Quality Improvement Safety Program Manager, and/or the Infection Control Committee will investigate a hazardous materials or wastes incident. Copies of the findings from the investigation will be shared with appropriate personnel.
  
- iii) The Leadership is responsible for developing recommendations based on the conclusions of the investigation.
  
- e) Orientation and Education
  - i) Staff Development has overall responsibility for coordinating the Orientation and education program for each of the functions associated with Management of the Environment of Four Winds Lodge.
  
  - ii) Each new employee of Four Winds participates in a general Orientation program which includes an overview of the Hazardous Materials and Wastes and Infection Control Plans. The overview introduces new employees to the general concept of the plan and the circumstances under which it is activated.
  
  - iii) Attendance is tracked to ensure compliance and maintains records of participation and performance during Orientation.
  
  - iv) Each new employee also participates in a department and job specific Orientation. Staff Development and supervisors are responsible for providing new personnel with a job specific Orientation to the Hazardous Materials and Wastes and Infection Control Plans. The goal of the job specific Orientation is to provide new employees with current information including hazardous materials and wastes, job specific risks of exposure, and emergency procedures. New employees are expected to complete job specific Orientation within thirty days of employment.
  
  - v) All employees of Four Winds Lodge are required to participate in an annual mandatory “Right-to-Know” training program. The annual training includes material addressing hazardous materials and wastes, labeling requirements, understanding Safety Data Sheets and identification of where the Safety Data Sheets are located. The annual training also includes Infection Control and Blood Borne Pathogen information.

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- f) Performance Improvement
  - i) The Quality Assurance/ Quality Improvement Safety Program Manager has overall responsibility for coordinating the performance improvement standard process for each of the functions associated with management of the Environment of Four Winds Lodge.
  - ii) The Quality Assurance/ Quality Improvement Safety Program Manager, in collaboration with the Safety Committee, is responsible for establishing performance improvement standards to objectively measure the effectiveness of the Hazardous Materials and Wastes Plan. The Quality Assurance/ Quality Improvement Safety Program Manager, in cooperation with the Safety Committee, determines appropriate data sources, data collection methods, data collection intervals, analysis techniques and report formats for the performance improvement standards. The performance improvement standards are communicated at Safety Committee meetings.
  - iii) The Safety Committee report summarizes performance compared to the performance improvement standard. If deficiencies are identified, a plan of action is developed to address the deficiency.
- g) Emergency Procedures
  - i) The Quality Assurance/ Quality Improvement Safety Program Manager is responsible for developing emergency procedures for the Hazardous Materials and Wastes Plan.
  - ii) The supervisors are responsible for coordinating activities with regard to emergency procedures for the Hazardous Materials and Wastes Plan with the Quality Assurance/ Quality Improvement Safety Program Manager.
- h) Annual Evaluation
  - i) The Quality Assurance/ Quality Improvement Safety Program Manager has overall responsibility for coordinating the annual evaluation process with each of the functions associated with management of the Environment of Four Winds Lodge.
  - ii) The annual evaluation uses a variety of information sources including internal policy and procedure review, Incident Report summaries, meeting minutes, Safety Committee reports, and other summaries of activities. In addition, findings by outside agencies such as accrediting or licensing bodies, or the Fire Marshal's Office are used. The annual review examines the objectives, scope, performance, and effectiveness of the Hazardous Materials and Wastes Plan. The findings of the annual review are presented in a narrative report supported by relevant data. The report provides a balanced summary of the Hazardous Materials and Wastes Plan performance over the preceding 12 months. Strengths are noted and deficiencies are evaluated to set goals for the next year or longer-term future.
  - iii) The annual review is presented to the Safety Committee and the Management Team. Once the review is finalized, the Leadership is responsible for implementing the recommendations in the report as part of the performance improvement process.

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| <b>Internal and/or External References</b> | FOUR WINDS LODGE-Hazardous Materials and Wastes Management Plan 2/1/2014 |
|  | HHS-ADM Incident Report Policy   |
| <b>Compliance - Posting Date</b>           | 7/26/2019  |
| <b>Replaces – Policy Number</b>            |  |
| <b>Next Review - Due Date</b>              | 7/26/2020  |