

2023 – Salisbury University EHS Audit

Location: Salisbury, Maryland, USA

Auditor(s): Morgan Mason CSP, CIT, SSH, MOC, CHMM

Date(s): July 26, 2023

Audit Scope

- The facility is audited based on Environmental, Health, & Safety written plans, policies, and procedures. A detailed audit checklist is used to ensure each clause of the system is met.
- Audit results are based on:
 - Facility Tour
 - Verification of documents and records
 - Verification of procedures and processes
 - Employee interviews

Housekeeping

- Laboratories
- Offices
- Common Areas
- Building Conditions
- Hallways
- Storage Areas

Audit Summary

EHS Audit Summary	
COMPANY/FACILITY INFORMATION	
Company/Facility:	Salisbury University
Location (City, State/Country):	Salisbury, Maryland, USA
Company Address:	1123 South Divison St, Salisbury, MD, 21801
Number of Employees:	2013
Facility Phone #:	410-543-6000
NAICS #:	
EPA ID # (if applicable):	MDD982703787
Generator Status:	LQG
Storm Water # (if applicable):	
Waste Water Permit # (if applicable):	
Air Permit # (if applicable):	
State ID # (if applicable):	
AUDIT INFORMATION	
Lead Auditor:	Morgan Mason CSP, CIT, SSH, MOC, CHMM
Auditor(s):	
General Manager:	
EHS Representative:	Jillian Townsend, MPH
Inspection Date(s):	7/26/2023

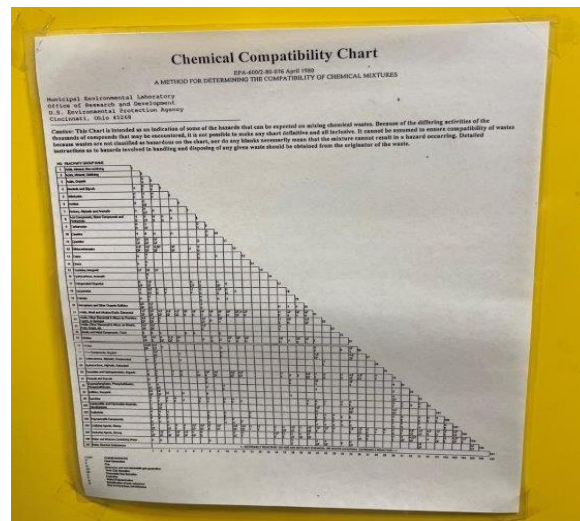
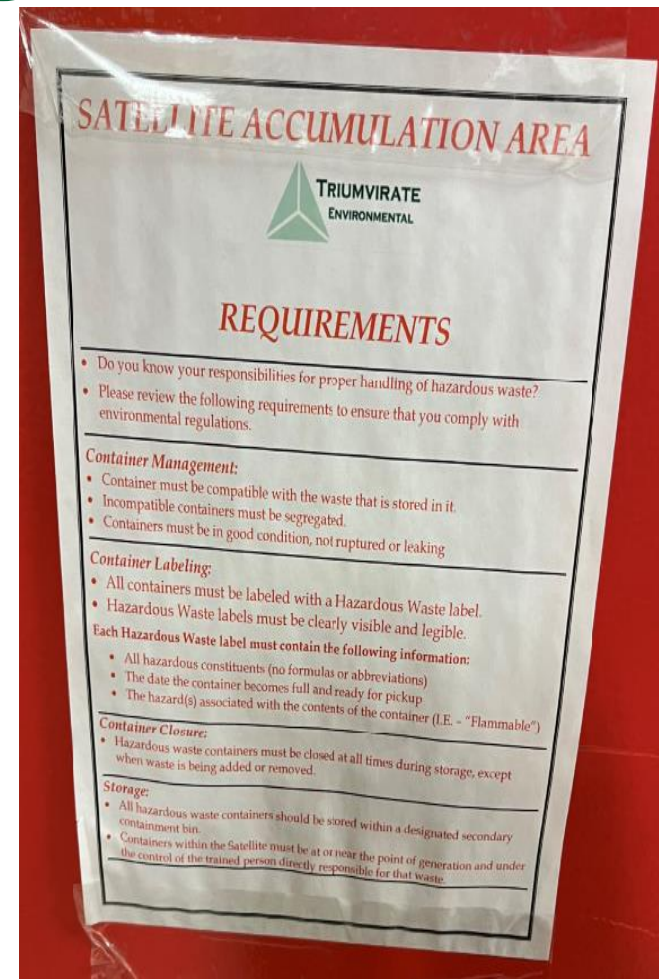
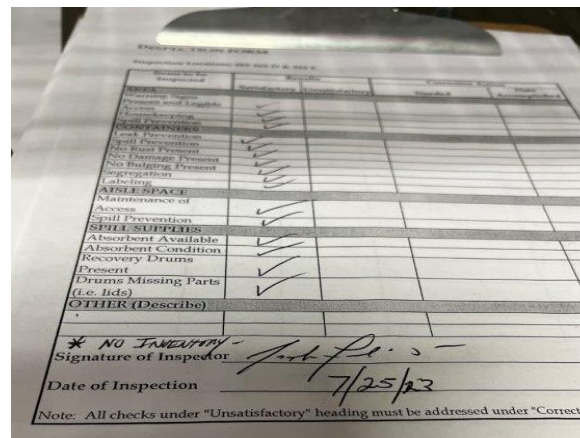
Executive Summary

- The facility has approximately **+2000** employees
- Current large projects/initiatives include: **N/A**



Compliance & Strength

Areas of Compliance & Strength



7 CAA is clean with excellent labelling. Inspections, PPE, & Materials Handling Equipment readily available



Areas of Compliance & Strength

Emergency Response Guide

CATEGORY	DESCRIPTION	CONTACT	PHONE NUMBER
SAFETY	Personal safety concerns	University Police	On campus: 3-4222 Off campus: 410-543-4222
TERRORISM	Suspicious packages, materials or individuals	University Police	On campus: 3-4222 Off campus: 410-543-4222
FIRE	Evacuate area Call for help. Pull fire alarm. Warn others to evacuate as you leave the building. Move a safe distance from the building. Provide information to emergency responders as they arrive.	911... Next contact University Police from a safe location	911
MINOR INJURY: Non life-threatening injury	Offer self service first aid supplies, if available University Police may transport person if unable to drive Student Health Services may treat, where applicable Complete Incident Report after treatment	University Police Student Health Services	On campus: 3-4222 Off campus: 410-543-4222 On campus: 3-4262 Off campus: 410-543-4262
ALL SERIOUS INJURIES Life threatening injuries	Call 911 University Police are trained in first aid	911	911

CELL PHONE INFO: NEVER INTERFERE

ACTIONS	EMERGENCY CAMPUS	GET INFORMATION
<ul style="list-style-type: none"> Be quiet Light and Lock or turn Contact University Police if possible Use your best judgment 	<ul style="list-style-type: none"> Go to the nearest exit and move a safe distance from the exit Follow instructions from University Police and Emergency Responders 	<ul style="list-style-type: none"> Seek information from any available source including e-mail, campus channel 24, posted signs and www.salisbury.edu/emergency

Salisbury Inmate Care is located approximately 1 mile north of the campus on U.S. Route 13 (410-543-2020).
PBIAC is approximately 1.2 miles north of the campus on US Route 13 (410-543-7103).
*Non-Employees and Employees Incident Report forms are available online: www.salisbury.edu/health/body/accident



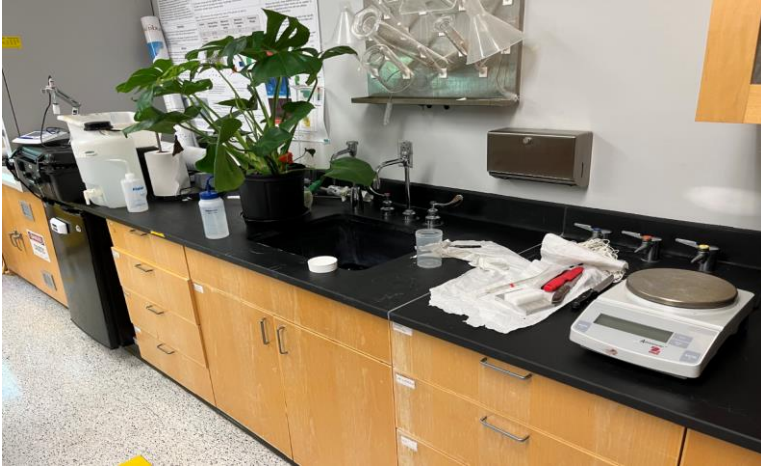
Best Practice - EHS





De Minimis

Areas for Improvement (De Minimis)



Areas for Improvement (De Minimis)



Areas for Improvement (De Minimis)



Areas for Improvement (De Minimis)



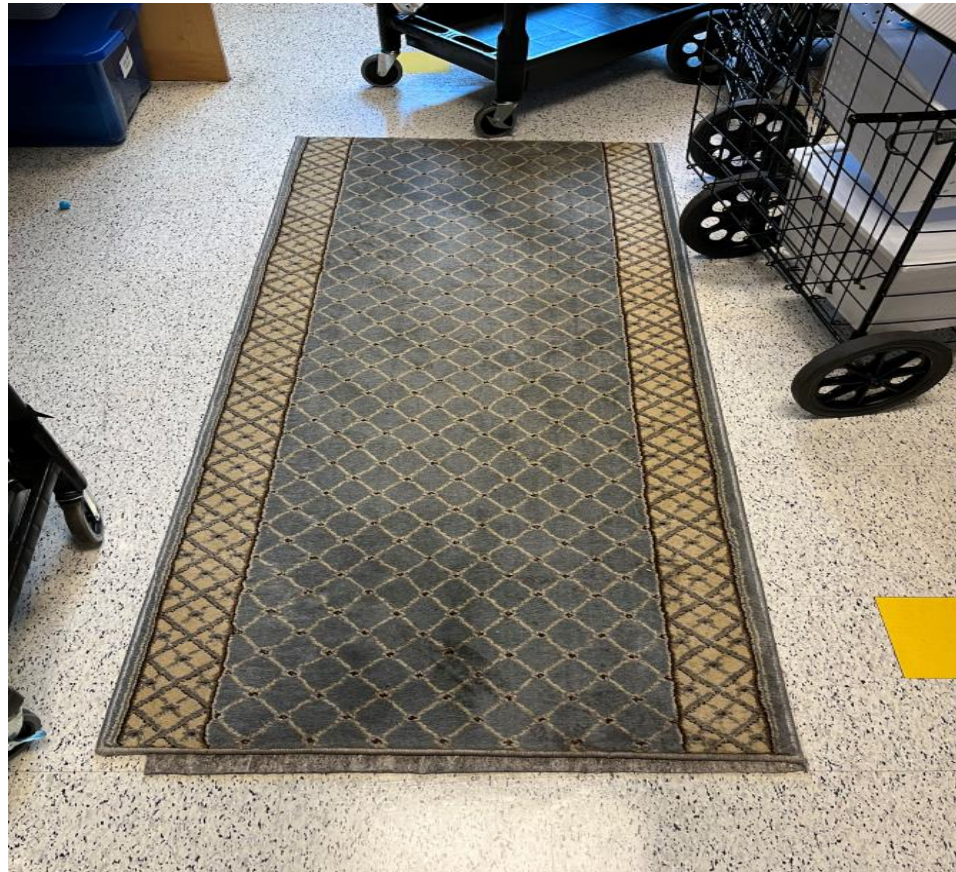
Areas for Improvement (De Minimis)



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Areas for Improvement (De Minimis)



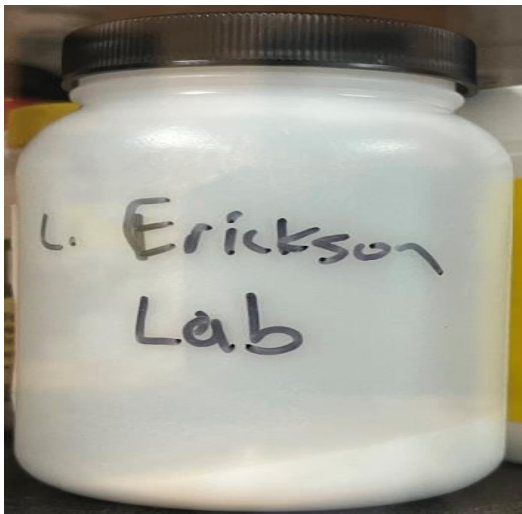
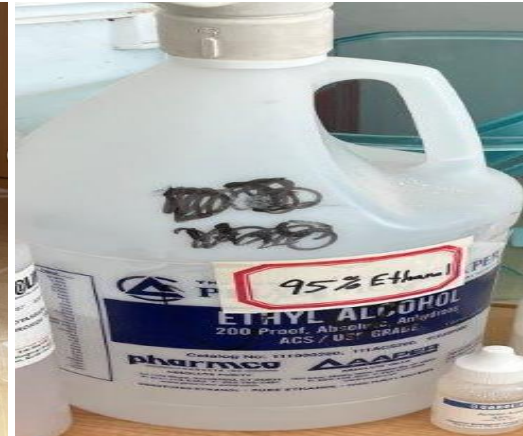


Corrective And Preventative Actions (CAPAs)

Corrective And Preventative Actions (CAPAs)

- **CAPA #: 20230726-TEICAPA-SU-001**
- **Regulation:**
 - 29 CFR 1910.1200(f)(6)(ii) – *Workplace labeling: ...the employer shall ensure that each container of hazardous chemicals in the work place is labeled, tagged, or marked with either:*
 - (ii) *“Product identifier and words, pictures, symbols, or combination thereof, which provide at least general information regarding the hazards of the chemicals, and which, in conjunction with the other information immediately available to employees under the hazard communication program, will provide employees with the specific information regarding the physical and health hazards of the hazardous chemical.”*
- **Finding:** Several examples of hazardous materials not being labeled correctly. Missing labels, missing hazard characteristics, chemical formula being used in place of name, unknown chemicals, etc.
- **Recommendation:** Ensure personnel undergo adequate training (OSHA’s HAZCOM Standard (1910.1200)). Also, provide secondary container labels for all hazardous chemicals (best practice: all chemicals).

20230726-TEICAPA-SU-001



Corrective And Preventative Actions (CAPAs)

- **CAPA #: 20230726-TEICAPA-SU-002**
- **Regulation:**
 - 29 CFR 1910.303(b)(2)
 - *“Installation and use. Listed or labeled equipment shall be installed and used in accordance with any instructions included in the listing or labeling.”*
- **Finding:** Relocatable Power Taps (aka: power strip/surge protector, etc.) are “daisy-chained” (one power strip is plugged into another power strip). This violates the UL listing and poses a possible electrical/fire hazard.
- **Recommendation:** Un-plug power strip and plug into appropriate wall outlet.

20230726-TEICAPA-SU-002



Corrective And Preventative Actions (CAPAs)

- **CAPA #: 20230726-TEICAPA-SU-003**
- **Regulation:**
 - 29 CFR 1910.106(e)(2)(b)(1)
 - *The quantity...located outside of a ... storage cabinet in a building or in any one fire area of a building shall not exceed: (25)-gallons of (OSHA) Category 1 flammable liquids in containers.*
- **Finding:** Category 1 Flammable liquids reaching near and/or slightly exceeding allowed quantity outside of flammable cabinet in certain areas.
- **Recommendation:** Limit storage of flammable chemicals outside a flammable cabinet. If possible, obtain more flammable cabinets of varying sizes; chemical inventory/reduction could also assist.

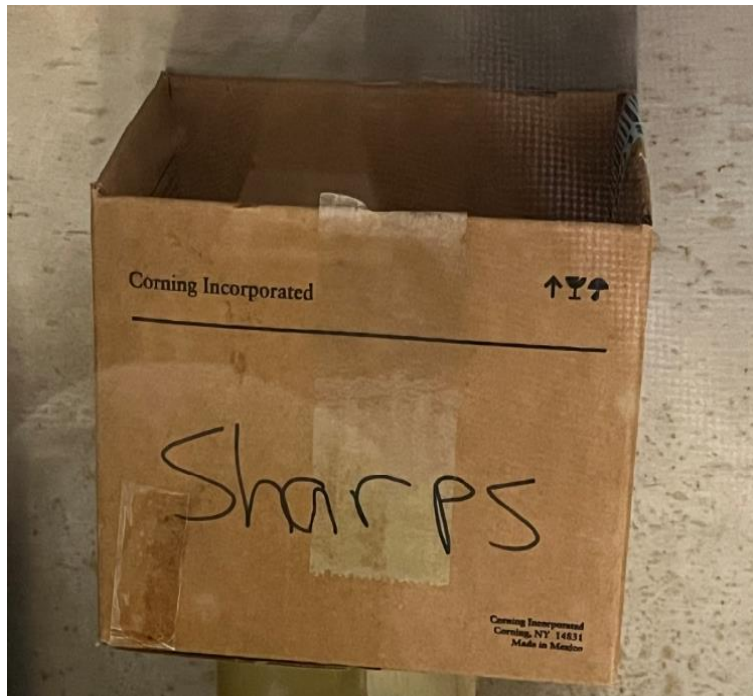
20230726-TEICAPA-SU-003



Corrective And Preventative Actions (CAPAs)

- **CAPA #: 20230726-TEICAPA-SU-004**
- **Regulation:**
 - 29 CFR 1910.1030(d)(4)(iii)(A)(1)(i-iv)
 - *“Contaminated sharps shall be discarded immediately or as soon as feasible in containers that are: **closable, puncture resistant, leakproof** on sides and bottom, **and** labeled or color coded...”*
- **Finding:** Inadequate containers are being used as sharps waste containers. These containers do not meet the OSHA definition of a “sharps container”.
- **Recommendation:** Purchase appropriately sized sharps containers – ensure that they are able to fit the size of the sharps they are holding (not protruding out)

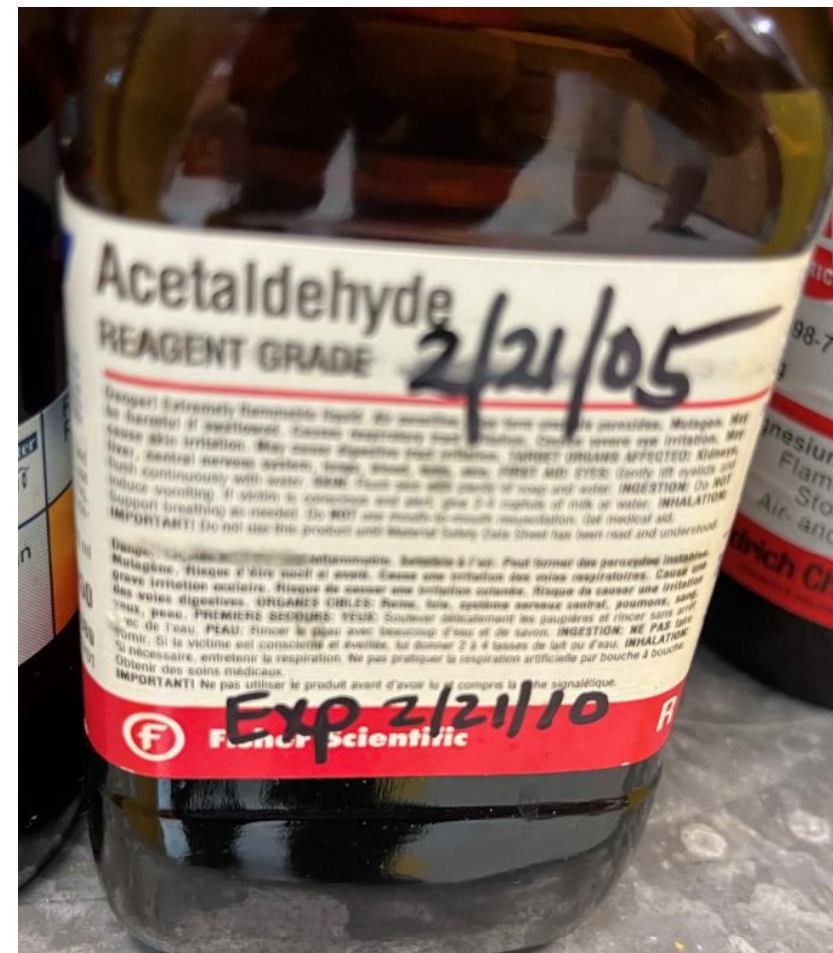
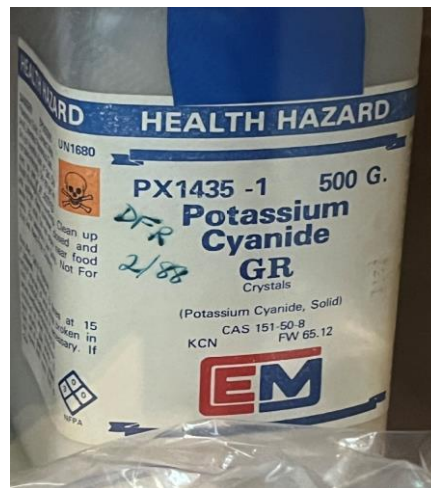
20230726-TEICAPA-SU-004



Corrective And Preventative Actions (CAPAs)

- **CAPA #: 20230726-TEICAPA-SU-005**
- **Regulation:**
 - 29 CFR 1910.1200(e)(1)(i) – *Written Hazardous Communication Program to include the following:*
 - (i) “A list of the hazardous chemicals known to be present using a product identifier that is referenced on the appropriate safety data sheet (the list may be compiled for the workplace as a whole or for individual work areas)”...
- **Finding:** Some chemicals have expired since the late 80’s/90’s. An adequate, up-to-date chemical inventory for each laboratory should be established, including each hazardous chemical’s Safety Data Sheet.
- **Recommendation:** Remove all expired chemicals and update hazardous chemical inventory for each laboratory. Obtain applicable Safety Data Sheets. Ensure employees receive adequate training on OSHA’s Hazardous Communication and Salisbury University’s Written Hazard Communication Program.

20230726-TEICAPA-SU-005



Corrective And Preventative Actions (CAPAs)

- **CAPA #: 20230726-TEICAPA-SU-006**
- **Regulation:**
 - 29 CFR 1910.334(a)(3)(i)
 - *“A flexible cord (extension cord) used with grounding-type equipment shall contain an equipment grounding conductor”*
- **Finding:** Extension cord(s) missing grounding prong. Potential electrical/fire hazard.
- **Recommendation:** Replace/Repair extension cord and ensure grounding prong is in place.

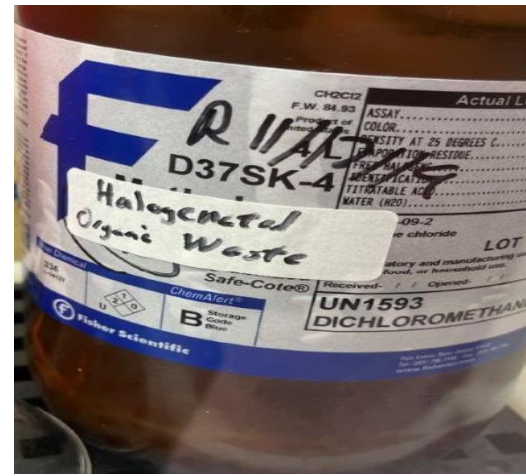
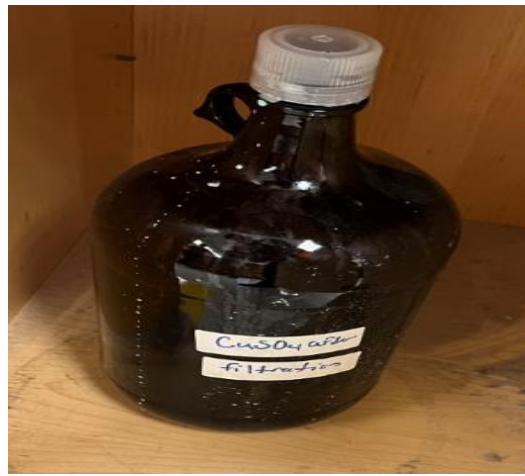
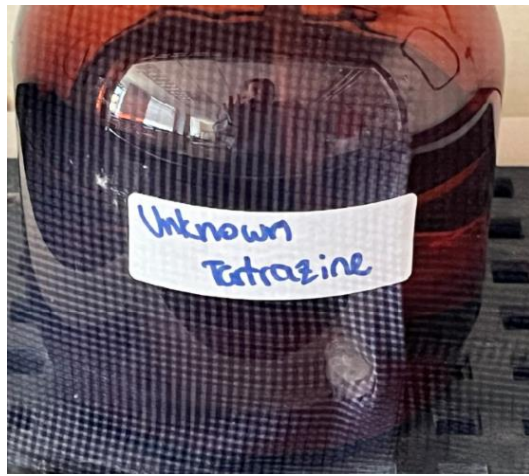
20230726-TEICAPA-SU-006



Corrective And Preventative Actions (CAPAs)

- **CAPA #:** 20230726-TEICAPA-SU-007
- **Regulation:**
 - 40 CFR 262.15(a)(4)
 - “A container holding hazardous waste must be closed at all times during accumulation”
 - 40 CFR 262.15(a)(5)(i-ii)
 - “A generator must mark or label its container with the following: (i) the words ‘Hazardous Waste’ and (ii) an indication of the hazards of the contents (ignitable, corrosive, reactive, toxic, etc.)...”
 - 40 CFR 262.17(a)
 - “A large quantity generator accumulates hazardous waste on-site for no more than 90-days...”
- **Finding:** Systemic issues regarding a Hazardous Waste System. Container Labeling, Storage, Accumulation Start Dates, Exceedance of Storage Time-Limits (90 days), Unknown Wastes, Open Waste Containers, etc.
- **Recommendation:** Ensure all HazMat Employees (per DOT 49 CFR 171.8) are adequately trained. Suggest RCRA annually (40 CFR 265.16(b)) and HazMat “General Awareness” Training every (3) years (DOT 49 CFR 172.704(c)(2)) for all HazMat Employees. Mark all hazardous waste appropriately as described above. Ensure Accumulation start date of hazardous waste begins when it enters Central Accumulation Area. Have Waste Transportation company pick up waste from Central Accumulation Area at least once per quarter to ensure not to exceed 90-day accumulation timeframe.

20230726-TEICAPA-SU-007



Corrective And Preventative Actions (CAPAs)

- **CAPA #: 20230726-TEICAPA-SU-008**
- **Regulation:**
 - 29 CFR 1910.147(c)(4)
 - *“Procedures shall be developed, documented and utilized for the control of potentially hazardous energy when employees are engaged in the activities covered by this section...”*
 - 29 CFR 1910.147(c)(6)(i)
 - *“The employer shall conduct a periodic inspection of the energy control procedure at least annually to ensure that the procedure and the requirements of this standard are being followed.”*
- **Finding:** No finding of LOTO procedures. Procedures not reviewed annually. Periodic Inspections not being performed.
- **Recommendation:** Ensure adequate training of all affected personnel – both Authorized and Affected employees. Work with Maintenance and other appropriate staff to write SOP’s and LOTO procedures. Review program/procedure on annual basis. Perform Periodic Inspection at least annually.

20230726-TEICAPA-SU-008

Photo(s) not available. Procedural/Document finding.

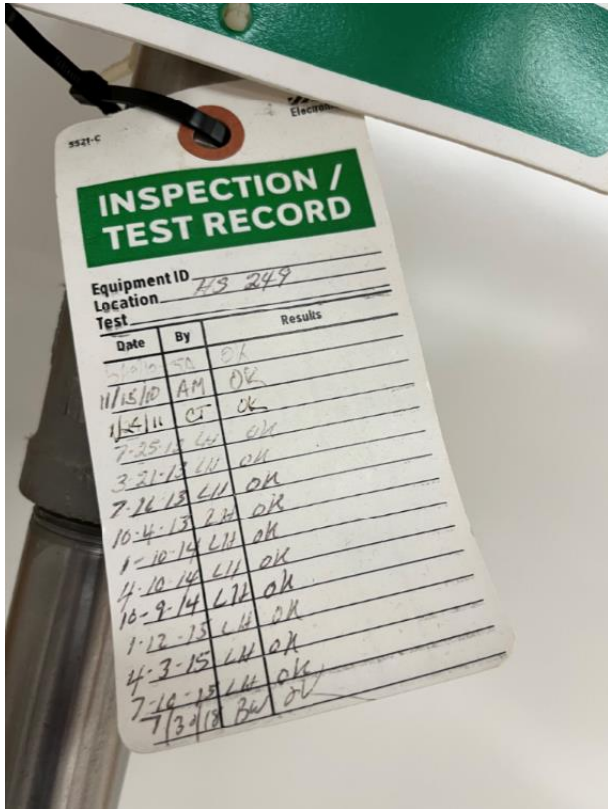


Observations & Recommendations

Observations & Recommendations

- Observation #: 20230726-TEIOBS-SU-001
 - **Finding:** Eyewash/Shower stations inspection only being performed annually. Suggest more frequent inspections if feasible.
- Observation #: 20230726-TEIOBS-SU-002
 - **Finding:** (2) Gas cylinders found not to be secured. Suggest to secure/tether.
- Observation #: 20230726-TEIOBS-SU-003
 - **Finding:** Potential Electrical shock/exposed wiring. Suggest to have qualified personnel (staff/contractor/electrician) to cover exposed wires to prevent exposure.
- Observation #: 20230726-TEIOBS-SU-004
 - **Finding:** (1) Fire extinguisher found not to be mounted (OSHA 29 CFR 1910.157(c)(1)).

20230726-TEIOBS-SU 001-004 Photos



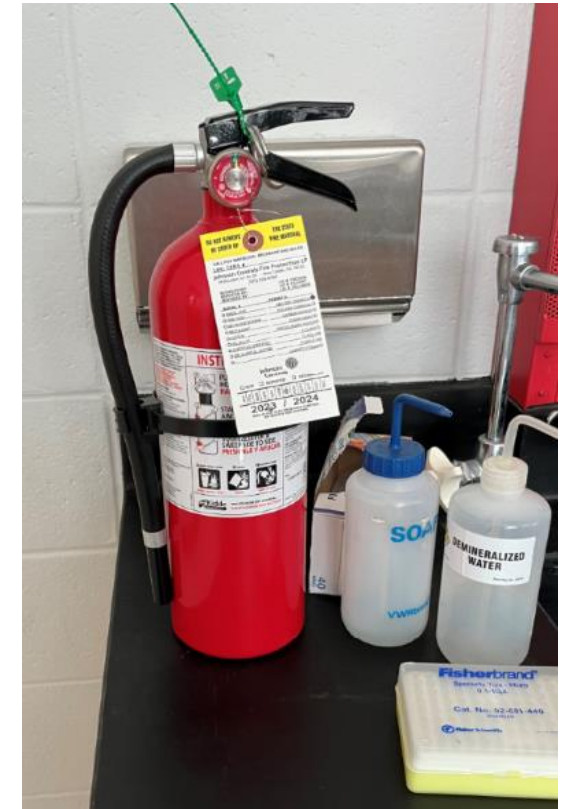
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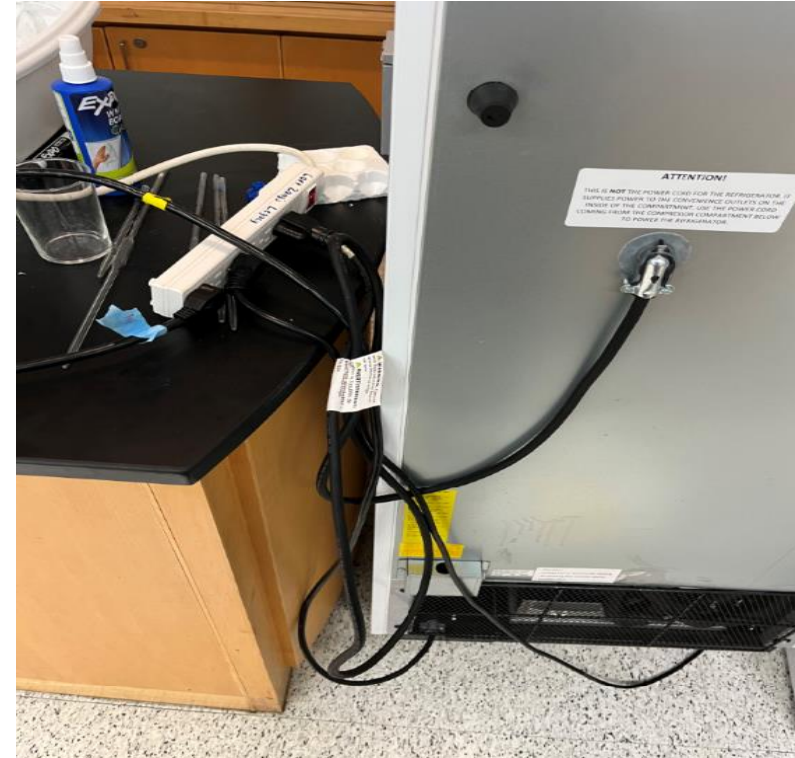
Observations & Recommendations

- Observation #: 20230726-TEIOBS-SU-005
 - **Finding:** Informed on tour by staff that wall-mounted equipment contains mercury. If improperly used (unscrewed at bottom) mercury will spill onto floor and students/employees could potentially be exposed to hazard. Suggest safety mechanism if or absolute removal.
- Observation #: 20230726-TEIOBS-SU-006
 - **Finding:** Refrigerator is plugged into Relocatable Power Tap (Power Strip/Surge Protector). The machine pulls a lot of electricity. Suggest to plug directly into wall outlet to prevent overload.
- Observation #: 20230726-TEIOBS-SU-007
 - **Finding:** Chemicals are not being segregated appropriately – one instance found segregated by alphabetical order; another instance flammables and corrosives were stored together. Suggest to segregate by hazard class and compatibility.

20230726-TEIOBS-SU 005-006 Photos

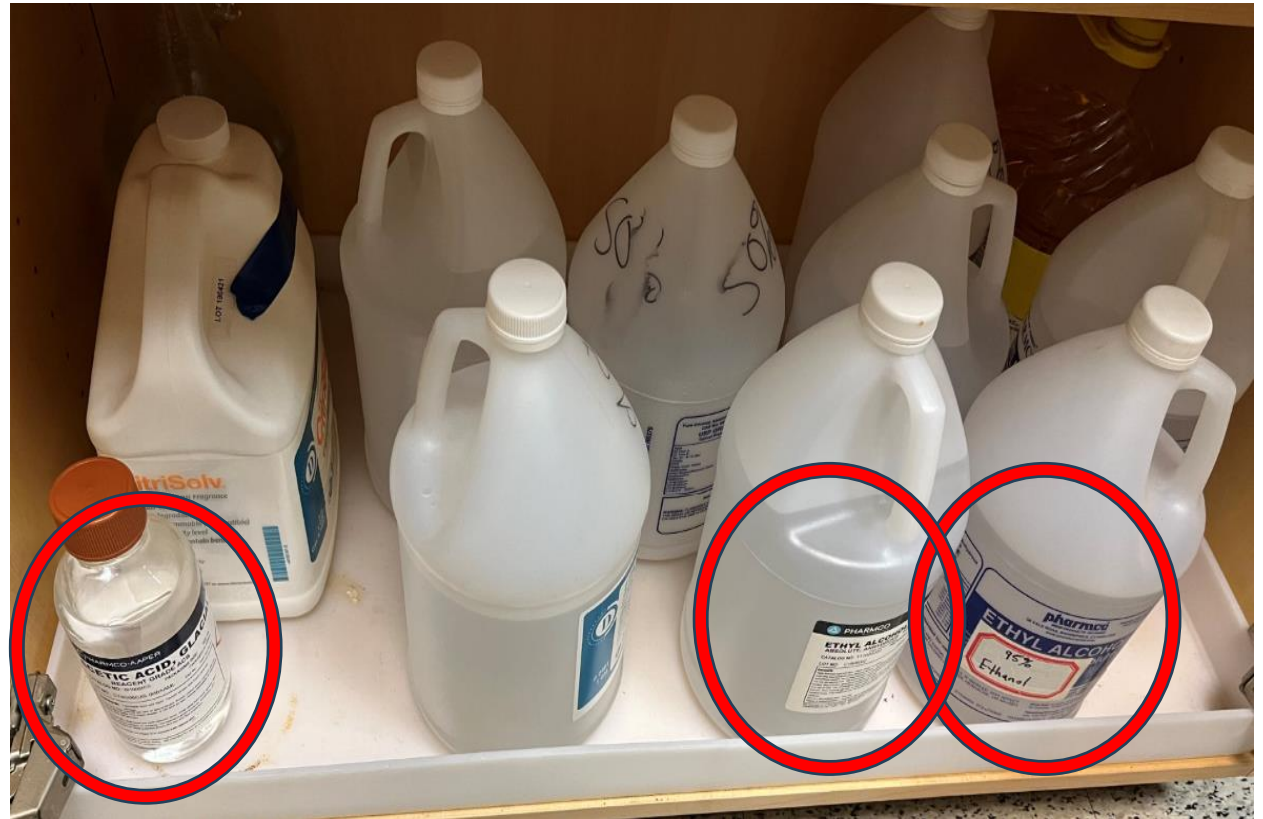


20230726-TEIOBS-SU-005



20230726-TEIOBS-SU-006

20230726-TEIOBS-SU 007 Photos



20230726-TEIOBS-SU-007



Audit Result

Audit Result

- **Tier IV (of IV!!)**
- The system is fully implemented with a high level of management control. Management is focusing on sustaining a continuous improvement culture and environment

Audit Results		
OVERALL TIER SCORE	Tier IV	91%



Post Audit

- **Jillian Townsend** is designated as the investigation leader(s).
 - Use RCA (Root-Cause-Analysis) for each CAPA to investigate each finding.
 - Determine actions that will eliminate the Root Cause and prevent future recurrence.
 - Notify Lead Auditor **Morgan Mason** for review and/or questions

Continual Improvement

- This Audit is part of a **Continual Improvement Cycle** and is recommended to recur at least annually.



THANK YOU!