

Laboratory Audit Procedures

The OSHA/PESH Laboratory Safety Standard (29CFR1910.1450) requires the University to develop and implement a Chemical Hygiene Plan to protect laboratory employees from occupational exposures to hazardous chemicals in laboratories. In addition to the Lab Standard, laboratory operations are also regulated by EPA and NFPA life and fire safety standards. As required by the Binghamton University Chemical Hygiene Plan, laboratories will be audited to assure safe work practices are being followed. The laboratory audit is intended to be comprehensive due to the large number of state and federal regulations covering laboratories and should be considered an evolving document that is subject to change as regulations and the Chemical Hygiene Plan are revised.

The purpose of the audit is to assist responsible faculty and staff members in identifying and correcting potential health and safety hazards that could pose an unreasonable risk to laboratory personnel, students, and the campus community. EH&S will conduct random and unannounced lab audits ONCE per semester with follow up audits as necessary. As an alternative, responsible faculty and staff members will have the option of scheduling an appointment to have their lab(s) audited and to be present or have a designated representative be present during the audit. Appointments will be scheduled on a “first come, first served” basis and will be limited to a 30-minute block of time per lab. NOTE: Scheduling an appointment for a lab audit is **optional**. For those faculty and staff members who wish to choose this option, it is highly recommended that appointments be made as early as possible once the audit process begins. Appointments can be scheduled by contacting Barry Jones, Environmental Specialist at 7-5799. Responsible faculty and staff members who do not wish to schedule an appointment will have their labs audited during random and unannounced times. **ALL laboratories will be audited.**

It is important to understand that any violations noted on the audit form **MUST** be corrected. Failure to correct documented safety violations can result in the responsible faculty/staff member being held liable for “willfully and knowingly” allowing a documented safety violation to exist. Because of the seriousness of the potential liability under these circumstances, a process has been implemented to ensure that all documented safety violations are corrected. The violation correction process has five stages, with ample notification and time given to all responsible parties. Failure to correct safety violations and complete the audit form within the given time period will result in the audit process moving to the next successive stage. It is fully anticipated the vast majority of all laboratories will complete the audit process within the first stage.

Two-week extensions to correct noted violations will be granted as long as the request for an extension is received in written format (i.e. Email, fax, memo). Only one two-week extension period will be granted per lab audit per semester. Requests for an extension should be directed to Barry Jones, Environmental Specialist. In the case of an infrastructure or facilities related violation, submission of a work order to Physical Facilities will qualify as attempting to correct the violation as long as a copy of the work order is attached to the completed audit form and sent to EH&S. Work orders should be submitted to Physical Facilities by the Building Administrator with a copy of the lab audit attached to the work order.

At any time during the audit process, the responsible faculty member or laboratory personnel may obtain assistance by contacting Barry Jones, Environmental Specialist at 7-5799.

STAGE 1

After the laboratory is audited, a copy of the audit form will be given to the faculty/staff responsible for the lab and copied to the Building Administrator. The responsible faculty/staff will be given 14 days from the audit date (as noted on the audit form) to correct any violations and to mail or fax a copy of the completed audit form to the EH&S office. Depending on the number and seriousness of the violations, a follow up audit may occur. Failure to submit a completed audit form within the given time period will result in the audit process moving to Stage 2.

STAGE 2

If a completed audit form is not returned to the EH&S office within 14 days, a reminder memo will be sent to the responsible faculty/staff member and copied to the Building Administrator. The responsible faculty/staff member will be given an additional 7 days to correct all violations and to mail or fax a copy of the completed audit form to the EH&S office. A follow up audit may occur. Failure to submit a completed audit form within 7 days will result in the audit process moving to Stage 3.

STAGE 3

If a completed audit form is not mailed or faxed to the EH&S office within 7 days, a memo will be sent to the Chair of the department (copied to the Building Administrator), along with copies of the audit form and reminder memo. The memo will notify the Chair that the responsible faculty/staff member will be given 5 days to correct all noted violations and to send a copy of the completed audit form to EH&S. A follow up audit WILL occur. Failure to submit a completed audit form within 5 days will result in the audit process moving to Stage 4.

STAGE 4

If a completed audit form is not mailed or faxed to the EH&S office within 5 days, a memo will be sent to the Dean's office (copied to the Chair and Building Administrator), along with copies of the audit form, the reminder memo, and the memo to the Chair. The memo will notify the Dean's office of the failure of the responsible faculty/staff member to correct noted safety violations and the failure to send a copy of the completed audit form to the EH&S office. It will also notify the Dean's office that the responsible faculty member will be given 5 days to correct all noted violations and to send a copy of the completed audit form to EH&S. A follow up audit WILL occur. Failure to submit a completed audit form within 5 days will result in the audit process moving to Stage 5.

At any time during the audit process, the responsible faculty member or laboratory personnel may obtain assistance by contacting Barry Jones, Environmental Specialist at 7-5799.

STAGE 5

At this point, the responsible faculty/staff member has had 31 days to correct noted violations. Due to the nature and seriousness of failing to correct these safety violations, the Chemical Hygiene Officer will shut down the laboratory operations of the responsible faculty/staff member. A meeting will be scheduled with the responsible faculty/staff member, the department Chair, Building Administrator, representatives from the Dean's office, and EH&S. Laboratory operations will remain shut down until ALL noted safety violations are corrected and a completed copy of the audit form is sent to the EH&S office. A follow up audit WILL occur.