Safety Inspection Program Guideline

Approval:

Signature on file 3/18/2019

Chair, Institution Safety Committee Date

Signature on file 3/18/2019

Director of Environment, Health & Safety Date
1. **PURPOSE & SCOPE:**

1.1. The purpose of this guideline is to establish the minimum requirements for an effective safety inspection program. This guideline is intended to prevent accidents and injuries, increase safety awareness, and increase compliance with State and Federal environmental, health, and safety requirements and standards.

1.2. This guideline applies to all WHOI personnel and operations, except marine operations that are addressed by applicable U.S. Coast Guard regulations.

2. **ROLES & RESPONSIBILITIES:**

2.1. Environmental Health & Safety (EH&S): The EH&S Office is responsible for coordinating and conducting safety inspections, issuing inspection reports, assisting with corrective actions, maintaining this guideline, and updating the department inspection lists.

2.2. Departments: Department chairpersons, department administrators, department safety committees, or other department resources will assist the EH&S Office with the following items:

- Identifying the space representative for the higher hazard spaces that EH&S inspects,
- Facilitating the timely resolution of Priority 1 and carryover safety items (defined in section 4) that are identified during safety inspections, and

- Principal Investigators (PIs) and Supervisors: PIs and supervisors or their designees (space representatives) are responsible for providing access to their respective spaces for scheduled inspections, making a reasonable effort to be present during the inspections, and ensuring that corrective actions are implemented in a timely manner.

3. **INSPECTIONS:**

3.1. The EH&S Office will coordinate and conduct all inspections. In general, higher hazard areas will be inspected annually. Examples of higher hazard areas include chemical use and storage areas, shop/industrial space, maintenance areas, equipment rooms, and fabrication areas.

3.2. Lower hazard spaces, such as offices and meeting rooms, can be self-inspected by the space user or representative. A self-inspection safety checklist for office/low hazard spaces is available on the EH&S website under the safety inspection program bullet.

3.3. The inspections will be scheduled at a mutually agreeable time for the EH&S Office and the representative from the location to be inspected. If the space representative is not available after several attempts to schedule an inspection, the EH&S Office representative will perform the inspection without this person.

3.4. The EH&S Office representative will share the appropriate inspection checklist (lab or shop/industrial space) with the space representative prior to the inspection to encourage identification and correction of safety issues.
3.5. Inspections will include a walk-through of the selected area(s), interviews with personnel, and review of relevant documentation.

3.6. As applicable, inspections may include the following items:
   - Fire protection, life safety, and emergency response procedures/equipment
   - Chemical safety and exposure controls
   - Personal protective equipment
   - Electrical safety
   - Material handling and ergonomics
   - Machine guarding and engineering controls
   - Machine and carpentry shop and equipment/tool safety
   - Walking and working surfaces
   - Waste management and pollution prevention

3.7. The EH&S Office representative will discuss inspection procedures with all personnel involved in the inspection and describe all EH&S issues/findings that are identified during the inspection. The EH&S Office representative will note serious/imminent hazards, instances of non-compliance with applicable EH&S regulatory requirements, carryover items from previous inspections, and best management practices.

NOTE: Inspection results represent a sample of environmental, health and safety issues that may exist in the spaces that are inspected. Due to time limitations, safety inspections cannot be comprehensive and must rely on a sampling approach, i.e., not all areas, activities, equipment, and materials are reviewed. Therefore, PIs/supervisors or space representatives should use the inspection results as a guide to proactively identify and correct similar and/or other environmental, health and safety issues in their spaces.

4. INSPECTION REPORTS:

4.1. Following the inspection, the EH&S Office representative will prepare a draft inspection report.

4.2. The inspection report will be in a format that is approved by the EH&S Director and include: item number, location, observation, proposed corrective action, priority, assignment, status, names of personnel involved in the inspection, date, and inspection disclaimer (see NOTE above).

4.3. Priorities of inspection items shall be assigned as follows:

   1 – Immediate Hazard: Immediate Hazards are defined as situations that pose a high risk of danger. Example: unguarded machinery, fall hazard, blocked exits, exposure to uncontrolled hazardous energy sources, mismanagement of a highly hazardous chemical, no eyewash in corrosive use area, etc. Immediate hazards may also include code violations.

   2 – Safety Requirement: Safety requirements are defined as situations that clearly violate well established regulations. Example: unlabeled containers, incompatible chemical storage, etc.

   3 – Best Management Practice: Best Management Practices are defined as situations where no clear code violation is noted, but WHOI or other applicable safety standards are not being met. Example: expired calcium gluconate gel, space hazard label out of date, etc.
4.4. At a minimum, the PI/supervisor, space representative, and EH&S Director will receive a copy of the draft inspection report from the EH&S Office representative. Depending upon the items identified, other individuals, such as the Facilities Director, may need to receive a copy of the draft inspection report. After resolution of feedback, the EH&S Office representative will issue a final report. If there are no comments, the draft report will be considered final. Inspection reports will be saved in the EH&S network folder.

4.5. If Priority 1 (immediate hazard) and carryover items are identified on the inspection report, the department chairperson and department administrator will receive a copy of the draft inspection report. For non-science departments the responsible department director or vice president will receive a copy of the draft inspection report.

NOTE: Carryover items are safety inspection items that were identified during the previous inspection, but remain uncorrected.

5. CORRECTIVE ACTIONS:

5.1. If a condition is discovered to be immediately dangerous to life and health (IDLH) during the safety inspection, the corrective action will be termination of the hazardous activity until abatement of the hazard is complete.

5.2. The EH&S Office will assign each item on the inspection report to an individual or department for implementation of the appropriate corrective action and, as necessary, provide assistance during selection and implementation of corrective actions.

6. ISSUE RESOLUTION:

6.1. If a safety inspection report has been issued and there is a disagreement between the EH&S Office representative and the PI/supervisor or space representative as to the resolution of an item in the inspection report, the issue will be discussed with the EH&S Director.

6.2. If an item that has been escalated to EH&S Director and has not been resolved, the issue will be presented to the respective department safety committee and/or department chairperson for review and resolution.

6.3. For safety issues that cannot be resolved at the department level, the EH&S Director will request resolution from the V.P. for Finance & Chief Financial Officer and/or the V.P. for Legal Affairs.