
Citation and Notification of Penalty

To:
Mayor & City Council of Baltimore
DBA Baltimore City Health Dpt.-Druid Sexual Health
Clinic
1515 West North Avenue
Baltimore, MD 21217

Inspection Number: 1599735
Inspection Date: 06/03/2022-07/05/2022
Issuance Date: 08/17/2022
Case No.: J8798-012-22

Inspection Site:
1515 West North Avenue
Baltimore, MD 21217

The violation(s) described in this Citation and Notification of Penalty is (are) alleged to have occurred on or about the day(s) the inspection was made unless otherwise indicated within the description given below.

This is an official charging document which has specific deadlines for actions and is known as a Citation and Notification of Penalty (this Citation) which describes violations of the Maryland Occupational Safety and Health Act (Labor & Employment Article, Titles 1, 2 and 5) and Regulations. The penalty(ies) listed herein is (are) based on these violations. You must abate the violations referred to in this Citation by the dates listed and pay the penalties, unless within 15 working days (excluding weekends and State holidays) from your receipt of this Citation and Notification of Penalty you mail a notice of contest to the Commissioner at the address shown above. Issuance of this citation does not constitute a finding that a violation of the Act has occurred unless there is a failure to contest as provided for in the Act or, if contested, unless this citation becomes a final order of the Commissioner.

Posting - The law requires that a copy of this Citation and Notification of Penalty be posted immediately in a prominent place at or near the location of the violation(s) cited herein, or, if it is not practicable because of the nature of the employer's operations, where it will be readily observable by all affected employees. This Citation must remain posted until the violation(s) cited herein has (have) been abated, or for 3 working days (excluding weekends and State holidays), whichever is longer. **The penalty dollar amounts need not be posted and may be marked out or covered up prior to posting.**

Types of Violations - Violations are characterized as follows: (1) **Willful** - a violation where either: (a) the employer committed an intentional and knowing violation of the Act or Regulations or (b) though the employer was not intentionally violating the Act or regulations, he or she acted with plain indifference to or in careless disregard of employer responsibilities under the Act; (2) **Serious** - a violation where there is a substantial probability that death or serious physical harm could result, unless the employer did not know and could not know through the exercise of reasonable diligence, the existence of the violation; (3) **Other** - a violation that has a direct relationship to job safety and health, but which is not a serious violation; (4) **Repeated** - a violation of the same or similar standard for which an employer has been previously cited and which has become a final order; and (5) **Failure to Correct** - a violation for which a citation has been issued and the employer has failed to correct the violation within the permitted period for its correction.

Maryland Department of Labor
Division of Labor and Industry
Maryland Occupational Safety and Health (MOSH)

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Informal Conference - An informal conference is not required. However, if you wish to have such a conference you may request one during the 15 working day contest period. During such an informal conference you may present evidence concerning abatement or views which you believe would support an adjustment to the citation(s) and/or penalty(ies).

If you are considering a request for an informal conference to discuss any issues related to this Citation and Notification of Penalty, you must take care to schedule it early enough to allow time prior to the expiration of your contest period. Please keep in mind that a written letter of intent to contest must be submitted to the Commissioner within 15 working days of your receipt of this Citation. The running of this contest period is not interrupted by an informal conference.

If you decide to request an informal conference, please complete, remove and post page 4 (Notice to Employees) next to this Citation and Notification of Penalty as soon as the time, date, and place of the informal conference have been determined. Be sure to bring to the conference any and all supporting documentation of existing conditions as well as any abatement steps taken thus far. If conditions warrant, the agency may settle this matter without litigation or contest.

Right to Contest - You have the right to contest this Citation and Notification of Penalty. You may contest all citation items or only individual items. You may also contest penalties and/or abatement dates without contesting the underlying violations. Unless you inform the Commissioner in writing that you intend to contest the citation(s) and/or penalty(ies) within 15 working days after receipt, the citation(s) and the proposed penalty(ies) will become a final order of the Commissioner.

Penalty Payment - Penalties are due within 15 working days of receipt of this notification unless contested. Make your check or money order payable to "Division of Labor & Industry/MOSH". Please indicate the Case No. on the remittance.

MOSH does not agree to any restrictions or conditions or endorsements put on any check or money order for less than the full amount due, and will cash the check or money order as if these restrictions, conditions, or endorsements do not exist.

Employer Discrimination Unlawful - The law prohibits discrimination by an employer against an employee for filing a complaint or for exercising any rights under this Act. An employee who believes that he/she has been discriminated against may file a complaint no later than 30 days after the discrimination occurred with the Commissioner at the address shown above.

Contest By Employees - The law gives an employee or his/her representative the opportunity to object to any abatement date set for a violation if he/she believes the date to be unreasonable. The contest must be mailed to the Commissioner at the address shown above and postmarked within 15 working days (excluding weekends and State holidays) of the receipt by the employer of this Citation and Notification of Penalty.

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Division of Labor and Industry
Maryland Occupational Safety and Health (MOSH)

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Notification of Corrective Action - For violations which you do not contest, you **must** notify the Commissioner promptly by letter or the enclosed Abatement Verification Response form that you have taken appropriate corrective action within the time frame set forth on this Citation. Please inform the Commissioner in writing of the abatement steps you have taken and of their dates, together with adequate supporting documentation, e.g., drawings or photographs of corrected conditions, purchase/work orders related to abatement actions, air sampling results, etc. An additional citation, possibly with a penalty, maybe issued if abatement verification/documentation is not received.

Inspection Activity Data - You should be aware that OSHA publishes information on its inspection and citation activity on the Internet under the provisions of the Electronic Freedom of Information Act. The information related to these alleged violations will be posted when our system indicates that you have received this citation, but not sooner than 30 calendar days after the Citation Issuance Date. You are encouraged to review the information concerning your establishment at WWW.OSHA.GOV. If you have any dispute with the accuracy of the information displayed, please contact this office.

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Division of Labor and Industry
Maryland Occupational Safety and Health (MOSH)

Inspection Number: 1599735
Case No.: J8798-012-22
Inspection Date: 06/03/2022-07/05/2022
Issuance Date: 08/17/2022

NOTICE TO EMPLOYEES OF INFORMAL CONFERENCE

An informal conference has been scheduled with **MOSH** to discuss the citation(s) issued on

08/17/2022. The conference will be held at: _____

(location)

on _____ at _____ am/pm.

Employees and/or representatives of employees have a right to attend an informal conference.

NOTICE TO EMPLOYEES - Any Employee or representative of employees who believes that any period of time fixed in this Citation for the correction of a violation is unreasonable has the right to contest such time for correction by submitting a letter to the Commissioner at the address shown above within 15 work days (excluding weekends and state holidays) of the issuance of this citation.

EMPLOYER DISCRIMINATION UNLAWFUL - The law prohibits discrimination by an employer against an employee for filing a complaint or for exercising any rights under the Maryland Occupational Safety and Health Act. An employee who believes that he or she has been discriminated against may file a complaint with the Commissioner at the address shown above no later than 30 days after the discrimination.

Maryland Department of Labor
Division of Labor and Industry
Maryland Occupational Safety and Health (MOSH)

Inspection Number: 1599735
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Issuance Date: 08/17/2022

Citation and Notification of Penalty

Company Name: Mayor & City Council of Baltimore DBA Baltimore City Health Dpt.-Druid Sexual Health
Inspection Site: 1515 West North Avenue, Baltimore, MD 21217

Citation 1 Item 1 a Type of Violation: **Serious**

29 CFR 1910.1200(g)(8):The employer did not ensure that safety data sheets were readily accessible during each work shift to employees when they were in their work area(s):

(a) Date of Violation: 06/03/22

Condition: Hazardous chemicals observed included, but were not limited to, Birex Quat Wipes, a category 2 chemical, capable of causing serious eye irritation and a category 3 flammable liquid.

Abatement documentation (photographs, receipts, copies of programs, training certification, etc) is required for this item.

<u>Date By Which Violation Must be Abated:</u>	<u>August 25, 2022</u>
<u>Proposed Penalty:</u>	<u>\$0.00</u>

Citation 1 Item 1 b Type of Violation: **Serious**

29 CFR 1910.1200(h)(3)(iv):Employee training did not include the details of the hazardous communication program developed by the employer, including an explanation of labels received on shipped containers and the work place labeling system used by their employer, and the safety data sheet, including the order of information and how the employees can obtain and use the appropriate hazard information:

(a) Date of Violation: 06/03/22

Condition: Employees used Birex Quat Wipes to disinfect frequently touched services, a category 2 chemical, capable of causing serious eye irritation and a category 3 flammable liquid, where employees were not trained regarding the new label elements and safety data sheets format.

<u>Date By Which Violation Must be Abated:</u>	<u>September 20, 2022</u>
<u>Proposed Penalty:</u>	<u>\$0.00</u>

Maryland Department of Labor
Division of Labor and Industry
Maryland Occupational Safety and Health (MOSH)

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Issuance Date: 08/17/2022

Citation and Notification of Penalty

Company Name: Mayor & City Council of Baltimore DBA Baltimore City Health Dpt.-Druid Sexual Health
Inspection Site: 1515 West North Avenue, Baltimore, MD 21217

Citation 2 Item 1 Type of Violation: Other-than-Serious

29 CFR 1910.132(d)(2): The employer did not verify, through a written certification, the identity of the workplace evaluated, the person certifying that the evaluation had been performed, and the date the hazard assessment was done:

(a) Date of Violation: 06/03/22

<u>Date By Which Violation Must be Abated:</u>	<u>August 25, 2022</u>
<u>Proposed Penalty:</u>	<u>\$0.00</u>

Citation 2 Item 2 Type of Violation: Other-than-Serious

29 CFR 1910.1030(c)(1)(iv): The Exposure Control Plan was not reviewed and updated at least annually and whenever necessary as required.

(a) Date of Violation: 06/03/22

Condition: Employees were potentially exposed to bloodborne pathogens while using needles to administer medications by injection and while drawing blood for laboratory testing.

<u>Date By Which Violation Must be Abated:</u>	<u>August 25, 2022</u>
<u>Proposed Penalty:</u>	<u>\$0.00</u>

Maryland Department of Labor
Division of Labor and Industry
Maryland Occupational Safety and Health (MOSH)

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Citation and Notification of Penalty

Company Name: Mayor & City Council of Baltimore DBA Baltimore City Health Dpt.-Druid Sexual Health
Inspection Site: 1515 West North Avenue, Baltimore, MD 21217

Citation 2 Item 3 Type of Violation: Other-than-Serious

29 CFR 1910.1030(g)(2)(ii)(B): The employer did not ensure that the training was provided to employees with occupational exposure at least annually:

(a) Date of Violation: 06/03/22

Condition: Employees were potentially exposed to bloodborne pathogens while using needles to administer medications by injection and while drawing blood for laboratory testing, where training was last provided in 2019.

Abatement documentation (photographs, receipts, copies of programs, training certification, etc.) is required for this item.

Date By Which Violation Must be Abated:	September 20, 2022
Proposed Penalty:	\$0.00

Maryland Department of Labor
Division of Labor and Industry
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Company Name: Mayor & City Council of Baltimore DBA Baltimore City Health Dpt.-Druid Sexual Health
Inspection Site: 1515 West North Avenue, Baltimore, MD 21217

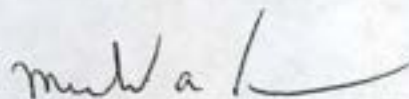
Citation 2 Item 4 Type of Violation: **Other-than-Serious**

29 CFR 1910.1200(e)(1)(i):The employer did not compile a list of the hazardous chemicals known to be present using a product identifier that was referenced on the appropriate safety data sheets:

(a) Date of Violation: 06/03/22

Condition: Hazardous chemicals observed included, but were not limited to, Birex Quat Wipes, a category 2 chemical, capable of causing serious eye irritation and a category 3 flammable liquid.

<u>Date By Which Violation Must be Abated:</u>	<u>August 25, 2022</u>
<u>Proposed Penalty:</u>	<u>\$0.00</u>



Michael A. Penn, CSP, SMS
Acting Assistant Commissioner

Maryland Department of Labor
Division of Labor and Industry
Maryland Occupational Safety and Health (MOSH)

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Company Name: Mayor & City Council of Baltimore DBA Baltimore City Health Dpt.-Druid Sexual Health
Inspection Site: 1515 West North Avenue, Baltimore, MD 21217

**INVOICE/
DEBT COLLECTION NOTICE**

Summary of Penalties for Inspection Number: 1599735

Citation 1 Item 1a, Serious	\$0.00
Citation 1 Item 1b, Serious	\$0.00
Citation 2 Item 1, Other-than-Serious	\$0.00
Citation 2 Item 2, Other-than-Serious	\$0.00
Citation 2 Item 3, Other-than-Serious	\$0.00
Citation 2 Item 4, Other-than-Serious	\$0.00
TOTAL PROPOSED PENALTIES:	\$0.00

Maryland Department of Labor

Division of Labor and Industry

Maryland Occupational Safety and Health (MOSH)

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Case No.:

J8798-012-22

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Issuance Date:

08/17/2022

Company Name: Mayor & City Council of Baltimore DBA Baltimore City Health Dpt.-Druid Sexual Health**Inspection Site:** 1515 West North Avenue, Baltimore, MD 21217**ABATEMENT VERIFICATION RESPONSE****Return To:**

Maryland Occupational Safety and Health

10946 Golden West Drive, Suite 160

Hunt Valley, MD 21031

As a result of the inspection/investigation conducted at your establishment, certain alleged hazards/violations were disclosed as indicated in the enclosed CITATION(s).
YOU ARE OBLIGATED BY LAW to correct hazardous conditions or practices in your workspace.

Please complete this ABATEMENT VERIFICATION RESPONSE and return it to the Agency at the above address as soon as possible by indicating what action you have taken to correct the violation(s) and date corrections were made within the time frame set forth. USE ADDITIONAL PAPER AS NECESSARY.

Citation	Description	Type	Abatement Due Date	Describe Action Taken	Date Corrected
1-1a	1910.1200(g)(8)	Serious	August 25, 2022		
1-1b	1910.1200(h)(3)(iv)	Serious	September 20, 2022		
2-1	1910.132(d)(2)	Other-than-Serious	August 25, 2022		
2-2	1910.1030(c)(1)(iv)	Other-than-Serious	August 25, 2022		
2-3	1910.1030(g)(2)(ii)(B)	Other-than-Serious	September 20, 2022		
2-4	1910.1200(e)(1)(i)	Other-than-Serious	August 25, 2022		

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08/17/2022

Company Name: Mayor & City Council of Baltimore DBA Baltimore City Health Dpt.-Druid Sexual Health

Inspection Site: 1515 West North Avenue, Baltimore, MD 21217

Affected employees and their representatives were informed on _____ of abatement steps taken.
Date

I certify that the above statements are true and correct.

Company Representative

Title

Citation and Notification of Penalty

To:
Mayor & City Council of Baltimore
DBA Baltimore City Health Dpt.-Druid Sexual Health
Clinic
1001 East Fayette Street
Baltimore, MD 21201

Inspection Number: 1599735
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Inspection Site:
1515 West North Avenue
Baltimore, MD 21217

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Maryland Occupational Safety and Health (MOSH)

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Inspection Activity Data - You should be aware that OSHA publishes information on its inspection and citation activity on the Internet under the provisions of the Electronic Freedom of Information Act. The information related to these alleged violations will be posted when our system indicates that you have received this citation, but not sooner than 30 calendar days after the Citation Issuance Date. You are encouraged to review the information concerning your establishment at WWW.OSHA.GOV. If you have any dispute with the accuracy of the information displayed, please contact this office.

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08/17/2022. The conference will be held at: _____

(location)

on _____ at _____ am/pm.

Employees and/or representatives of employees have a right to attend an informal conference.

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Citation and Notification of Penalty

Company Name: Mayor & City Council of Baltimore DBA Baltimore City Health Dpt.-Druid Sexual Health
Inspection Site: 1515 West North Avenue, Baltimore, MD 21217

Citation 1 Item 1 a Type of Violation: **Serious**

29 CFR 1910.1200(g)(8):The employer did not ensure that safety data sheets were readily accessible during each work shift to employees when they were in their work area(s):

(a) Date of Violation: 06/03/22

Condition: Hazardous chemicals observed included, but were not limited to, Birex Quat Wipes, a category 2 chemical, capable of causing serious eye irritation and a category 3 flammable liquid.

Abatement documentation (photographs, receipts, copies of programs, training certification, etc) is required for this item.

<u>Date By Which Violation Must be Abated:</u>	<u>August 25, 2022</u>
<u>Proposed Penalty:</u>	<u>\$0.00</u>

Citation 1 Item 1 b Type of Violation: **Serious**

29 CFR 1910.1200(b)(3)(iv):Employee training did not include the details of the hazardous communication program developed by the employer, including an explanation of labels received on shipped containers and the work place labeling system used by their employer, and the safety data sheet, including the order of information and how the employees can obtain and use the appropriate hazard information:

(a) Date of Violation: 06/03/22

Condition: Employees used Birex Quat Wipes to disinfect frequently touched services, a category 2 chemical, capable of causing serious eye irritation and a category 3 flammable liquid, where employees were not trained regarding the new label elements and safety data sheets format.

<u>Date By Which Violation Must be Abated:</u>	<u>September 20, 2022</u>
<u>Proposed Penalty:</u>	<u>\$0.00</u>

Maryland Department of Labor
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Company Name: Mayor & City Council of Baltimore DBA Baltimore City Health Dpt.-Druid Sexual Health
Inspection Site: 1515 West North Avenue, Baltimore, MD 21217

Citation 2 Item 1 Type of Violation: Other-than-Serious

29 CFR 1910.132(d)(2): The employer did not verify, through a written certification, the identity of the workplace evaluated, the person certifying that the evaluation had been performed, and the date the hazard assessment was done:

(a) Date of Violation: 06/03/22

<u>Date By Which Violation Must be Abated:</u>	<u>August 25, 2022</u>
<u>Proposed Penalty:</u>	<u>\$0.00</u>

Citation 2 Item 2 Type of Violation: Other-than-Serious

29 CFR 1910.1030(c)(1)(iv): The Exposure Control Plan was not reviewed and updated at least annually and whenever necessary as required.

(a) Date of Violation: 06/03/22

Condition: Employees were potentially exposed to bloodborne pathogens while using needles to administer medications by injection and while drawing blood for laboratory testing.

<u>Date By Which Violation Must be Abated:</u>	<u>August 25, 2022</u>
<u>Proposed Penalty:</u>	<u>\$0.00</u>

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Company Name: Mayor & City Council of Baltimore DBA Baltimore City Health Dpt.-Druid Sexual Health
Inspection Site: 1515 West North Avenue, Baltimore, MD 21217

Citation 2 Item 3 Type of Violation: **Other-than-Serious**

29 CFR 1910.1030(g)(2)(ii)(B):The employer did not ensure that the training was provided to employees with occupational exposure at least annually:

(a) Date of Violation: 06/03/22

Condition: Employees were potentially exposed to bloodborne pathogens while using needles to administer medications by injection and while drawing blood for laboratory testing, where training was last provided in 2019.

Abatement documentation (photographs, receipts, copies of programs, training certification, etc.) is required for this item.

Date By Which Violation Must be Abated:	September 20, 2022
Proposed Penalty:	\$0.00

Maryland Department of Labor
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Company Name: Mayor & City Council of Baltimore DBA Baltimore City Health Dpt.-Druid Sexual Health
Inspection Site: 1515 West North Avenue, Baltimore, MD 21217

Citation 2 Item 4 Type of Violation: **Other-than-Serious**

29 CFR 1910.1200(c)(1)(i): The employer did not compile a list of the hazardous chemicals known to be present using a product identifier that was referenced on the appropriate safety data sheets:

(a) Date of Violation: 06/03/22

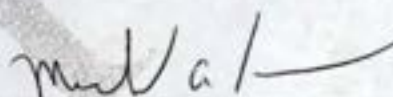
Condition: Hazardous chemicals observed included, but were not limited to, Birex Quat Wipes, a category 2 chemical, capable of causing serious eye irritation and a category 3 flammable liquid.

Date By Which Violation Must be Abated:

August 25, 2022

Proposed Penalty:

\$0.00



Michael A. Penn, CSP, SMS
Acting Assistant Commissioner

Maryland Department of Labor
Division of Labor and Industry
Maryland Occupational Safety and Health (MOSH)

Inspection Number: 1599735
Case No.: J8798-012-22
Inspection Date: 06/03/2022-07/05/2022
Issuance Date: 08/17/2022

Citation and Notification of Penalty

Company Name: Mayor & City Council of Baltimore DBA Baltimore City Health Dpt.-Druid Sexual Health
Inspection Site: 1515 West North Avenue, Baltimore, MD 21217

**INVOICE/
DEBT COLLECTION NOTICE**

Summary of Penalties for Inspection Number: 1599735

Citation 1 Item 1a, Serious	\$0.00
Citation 1 Item 1b, Serious	\$0.00
Citation 2 Item 1, Other-than-Serious	\$0.00
Citation 2 Item 2, Other-than-Serious	\$0.00
Citation 2 Item 3, Other-than-Serious	\$0.00
Citation 2 Item 4, Other-than-Serious	\$0.00
TOTAL PROPOSED PENALTIES:	\$0.00

Maryland Department of Labor
Division of Labor and Industry
Maryland Occupational Safety and Health (MOSH)

Inspection Number: 1599735
Case No.: J8798-012-22
Inspection Date: 06/03/2022-07/05/2022
Issuance Date: 08/17/2022

Company Name: Mayor & City Council of Baltimore DBA Baltimore City Health Dpt.-Druid Sexual Health
Inspection Site: 1515 West North Avenue, Baltimore, MD 21217

ABATEMENT VERIFICATION RESPONSE

Return To:

Maryland Occupational Safety and Health
10946 Golden West Drive, Suite 160
Hunt Valley, MD 21031

As a result of the inspection/investigation conducted at your establishment, certain alleged hazards/violations were disclosed as indicated in the enclosed CITATION(s). YOU ARE OBLIGATED BY LAW to correct hazardous conditions or practices in your workspace.

Please complete this ABATEMENT VERIFICATION RESPONSE and return it to the Agency at the above address as soon as possible by indicating what action you have taken to correct the violation(s) and date corrections were made within the time frame set forth. USE ADDITIONAL PAPER AS NECESSARY.

Citation	Description	Type	Abatement Due Date	Describe Action Taken	Date Corrected
1-1a	1910.1200(g)(8)	Serious	August 25, 2022		
1-1b	1910.1200(h)(3)(iv)	Serious	September 20, 2022		
2-1	1910.132(d)(2)	Other-than-Serious	August 25, 2022		
2-2	1910.1030(c)(1)(iv)	Other-than-Serious	August 25, 2022		
2-3	1910.1030(g)(2)(ii)(B)	Other-than-Serious	September 20, 2022		
2-4	1910.1200(e)(1)(i)	Other-than-Serious	August 25, 2022		

Maryland Department of Labor

Division of Labor and Industry

Maryland Occupational Safety and Health (MOSH)

Inspection Number:

1599735

Case No.:

J8798-012-22

Inspection Date:

06/03/2022-07/05/2022

Issuance Date:

08/17/2022

Company Name: Mayor & City Council of Baltimore DBA Baltimore City Health Dpt.-Druid Sexual Health

Inspection Site: 1515 West North Avenue, Baltimore, MD 21217

Affected employees and their representatives were informed on _____ of abatement steps taken.
Date

I certify that the above statements are true and correct.

Company Representative

Title

Maryland Occupational Safety and Health

30-Day Memo – Region 2

Company Name: Mayor & City Council of Baltimore DBA Baltimore City Health
Department- Druid Sexual Health Clinic

Case #: J8798-012-22

Inspection #: 1599735

Date Opened: 06/03/22

Date Turned in to Region: 07/18/22

Select all reasons case exceeded 30 days:

☐ Type of Inspection (circle): F A C R FU UR PP PR

☐ Number of Violations: Serious 3 OTS: 3

☐ Sampling

☐ Multiple Days on Site: 1 total days

☐ Lab Result Lag Time

☐ Process Safety Management

☐ Case Research (explain): _____

X Document Review (list): _____ See Narrative _____

X Other (explain): _____ See Narrative _____

Maryland Occupational Safety and Health

LEGAL NAME VERIFICATION COVER SHEET

Company Name: Mayor & City Council of Baltimore DBA Baltimore City Health
Department- Druid Sexual Health Clinic

Case #: J8798-012-22

Inspection #: 1599735

Legal name of the company was determined by:

☒ Employer completed legal name verification form (attached)

☐ Charter Service (attached)

through the state of _____

☐ Business License (attached)

☐ Phone Call: Company Officer Name: _____

Title: _____

Legal Name Given: _____

Other (explain): _____

If reconciliation of legal name documents could not occur explain below:

Maryland Occupational Safety and Health

Legal Name Form

10946 Golden West Drive, Suite 160
Hunt Valley, MD 21031
Fax: 410-527-4488

Case Number: _____

Legal Name of Company: Baltimore City Health Department
(Include correct grammar, abbreviations, and capitalization)

Business Lic. # / State N/A

Mailing Address: 1001 E. Fayette ST.
Baltimore, Maryland 21201

Street Address (if different from above):

Site Phone# () 410

Telephone #: () 410-396-1420

Fax # () 410-545-7608

Email address (no web pages please): Phyllis.Lee@baltimorecity.gov

Federal Tax ID # or SSN if none: 526000769

Total number of Employees at jobsite: 13

Total number of Employees Company-wide: 820

The company is a:
(Check only One)

- ☐ Corporation
☐ General Partnership
☐ LLP – Limited Liability Partnership
☐ LP – Limited Partnership
☐ Other Partnership Type
☐ Sole Proprietorship: _____ (name)
☒ Non-Profit

I, Phyllis Lee, certify that the above information is true and correct to the best of my knowledge.

Phyllis Lee
Signature

HR Business Partner
Title

6/9/2022
Date

Inspection Report

August 8, 2022 8:43 AM

RID	CSHO ID	Supervisor ID	Inspection Number	Optional Report Number	Case Closed Date
0352420	J8798	C9954	1599735	J8798-012-22	

Establishment Name	Mayor & City Council of Baltimore		Doing Business As (DBA)		Baltimore City Health Department-Druid Sexual Health Clinic	
Ownership Type	Private Sector	Type of Business	Corporation	Primary NAICS		923120 - Administration of Public Health Programs
Site Address	1515 West North Avenue Baltimore, MD 21217	Site Phone	(410) 396-0176	Extn		Site FAX (410) 396-9437
Business Address	1515 West North Avenue Baltimore, MD 21217	Business Phone		Business FAX		
Mailing Address	1001 East Fayette Street Baltimore, MD 21201	E-mail				
Site Activity	Testing and Treatment of Sexually Transmitted Diseases	Site NAICS	923120		Days on Site	1
Federal EIN	526000769	DUNS		Temporary or Fixed Site?	N	
State Estab Id		DUNS plus4		CAGE Code		
Construction Type						

Parent Company Legal Name			Parent Company Trade Name/DBA		
Parent Company Address		Phone Number		Extn	
TIN / EIN			DUNS		

CAGE Code		DUNS plus4	
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Entry	06/03/2022	09:35 AM	First Closing Conference	07/05/2022	12:30 PM
Opening Conference	06/03/2022	09:45 AM	Second Closing Conference		
Walkaround	06/03/2022	10:30 AM	Exit	06/03/2022	01:00 PM

Inspection Initiating Type	Complaint	Secondary Type	
Other Initiating Type		Inspection Category	Health
Scope of Inspection	Partial	Reason No Inspection	
Migrant Farm Worker	N	Expln. for No Insp.	
State Strategic Initiatives			
National Emphasis			
State/Local Emphasis			
Primary Emphasis			

Additional Codes			
Type	ID	Value	Description
N	02	BLOOD	Bloodborne Pathogens Related Inspection

Employed in Establishment	13	Walkaround?	Y	Advance Notice?	N
Covered By Inspection	13	Interviewed?	Y	Flag for Follow-up	N
Controlled By Employer	820	Union?	Y	Reason for Follow-up	
Is this Company a current federal contractor?		N			

Related UPA		
Activity Number	Activity Type	Establishment Name
1899779	Complaint	Baltimore Health Department

Related Inspections

Inspection Number	Related Inspection Type	Establishment Name
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SVEP Information					
SVEP Case?	Post Citation SVEP Action	Post Citation SVEP Action Date	Is this inspection related to a previous SVEP inspection?	Is an Imminent Danger Notice included in this case?	Date Imminent Danger Notice was issued
N			N	N	

Employer Representatives Contacted					
Name	Elizabeth Gilliams	Job Title	Director of STI Services	Occupation	Director of Sexual Transmitted Infection Services
Address	1515 W North Ave. BALTIMORE, MD 21217			Interviewed?	Y
Home		Mobile	(410) 396-0176	Fax	
Email	elizabethgilliams@batlimorecity.gov		Participation		Credentials, Opening Conference, Closing Conference

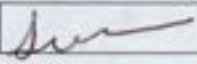
Employer Representatives Contacted					
Name	Phyllis Lee	Job Title		Occupation	Human Resource Manager
Address	1001 E. Fayette Street BALTIMORE, MD 21201			Interviewed?	N
Home		Mobile	(410) 916-5131	Fax	
Email	Phyllis.Lee@baltimorecity.gov		Participation		Credentials

Employer Representatives Contacted					
Name	Adena Greenbaum	Job Title	Asst. Commissioner for Clinical Services	Occupation	Assistant Commissioner for Clinical Services
Address	1001 E. Fayette Street BALTIMORE, MD 21202			Interviewed?	N
Home		Mobile	(443) 687-6861	Fax	

Email	Adena.Greenbaum@baltimorecity.gov		Participation	Credentials, Closing Conference	
Employees Contacted					
Name	Andrea Fische	Job Title	Nurse Practitioner	Occupation	Nurse Practitioner
Address				Interviewed?	Y
Home		Mobile		Fax	
Email	andrea.fische@baltimorecity.gov		Participation	Credentials	
Employees Contacted					
Name	Shakia Hill	Job Title	Supervisor Front Desk Support	Occupation	Supervisor Front Desk Support
Address				Interviewed?	Y
Home		Mobile		Fax	
Email			Participation	Credentials	
Employees Contacted					
Name	Suzanne Garcia	Job Title	Nurse Practitioner	Occupation	Nurse Practitioner
Address				Interviewed?	Y
Home		Mobile		Fax	
Email	suzanne.e.garcia@gmail.com		Participation	Credentials	
Employees Contacted					
Name	Khannel Briddell	Job Title	Lab Technician	Occupation	Lab Technician
Address				Interviewed?	Y
Home		Mobile		Fax	
Email	khannelbriddell@baltimorecity.gov		Participation	Credentials	
Union Information					

Union Name	AFSCME Local 67		Local	American Federation of State, County and Municipal Employees Council 67	
Rep Name	Dorothy Bryant	Job Title	Union Representative	Occupation	Union Representative AFSCME
Address				Interviewed?	N
Home		Mobile	(410) 837-7278	Fax	
Email	dbryant@afscme67.org		Participation	Credentials	
Additional Citation Mailing					
Organization Name	Baltimore City Health Department-Human Resources Department			Attention Name	Niela Magwood-Phoenix
Address	1001 E. Fayette Street BALTIMORE, MD 21201				
Home		Mobile		Fax	
Email					

Denial of Entry			
Denial Date/Time	Stage	Reason	Re-entry Date/Time

CSHO Signature		Date	08/08/22
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INSPECTION NARRATIVE

Inspection Number	1599735
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COVERAGE INFORMATION:

Mayor & City Council of Baltimore DBA Baltimore City Health Department-Druid Sexual Health Clinic (hereafter referred to as Druid Sexual Health Clinic) is located at 1515 West North Avenue, Baltimore, MD 21217. The Druid Sexual Health Clinic provides free and confidential testing, diagnosis, and treatments for Sexually Transmitted Infections (STIs). There are 13 employees who work at the North Avenue location and the clinic is operational Monday, Tuesday, Wednesday, and Friday 9:00AM-4:00PM and Thursday 9:00AM-1:00PM.

INTRODUCTION:

A Maryland Occupational Safety and Health (MOSH) limited scope inspection was initiated on June 03, 2022 with the Druid Sexual Health Clinic, in response to a complaint alleging possibly employees are exposed to bloodborne pathogens (BBPs) when handling contaminated sharps without safety devices.

At 9:35AM, Industrial Hygienist (IH) Sabrina Moore made initial entry to the main lobby/patient waiting area. IH Moore presented credentials to Timothy Bailey, Medical Claims Processor. IH Moore informed Mr. Bailey that MOSH was on-site to open an inspection. Mr. Bailey stated that he would inform Dr. Elizabeth Gilliams, Medical Director that MOSH was on-site to open an inspection. Dr. Gilliams proceeded to come to the main lobby/patient waiting area and escorted IH Moore to her office.

OPENING CONFERENCE NOTES:

An opening conference was conducted on June 03, 2022 at 9:45AM by IH Moore with Dr. Gilliams. Credentials were presented, the purpose, scope, and nature of the inspection were discussed, and a copy of the complaint was provided. The employer's rights and responsibilities were explained and copies of the Maryland Occupational Safety and Health Act and Regulations were provided. Dr. Gilliams explained that the employees were unionized. IH Moore informed Dr. Gilliams that the Union Representative would need to be made aware that MOSH was on-site to conduct an inspection. [REDACTED]

[REDACTED] Dr. Greenbaum informed Dr. Gilliams and IH Moore that a union representative was not on-site at the time of the inspection but would provide IH Moore with the contact information. Credentials were presented, the purpose, scope, and nature of the inspection were discussed.

During the opening conference Dr. Gilliams was asked for a response to the complaint alleging that employees were exposed to BBPs when handling contaminated sharps without safety devices. [REDACTED]

It was explained that 2-weeks prior to the inspection, the BD Eclipse 21-Gauge Safety Needles had run out and Precision Glide 22-Gauge Needles without safety devices were provided for the clinical staff. [REDACTED]

It was explained that Dr. Gilliams had directed Ms. Hill to put in a requisition for safety needles on many occasions, however, the procurement process was very slow and the clinic had yet to receive any additional shipments of safety needles. IH Moore asked Dr. Gilliams for the date of the last time Ms. Hill had put in a requisition. [REDACTED]

[REDACTED] She furthered explained that the Druid Sexual Health Clinic has had to use other vendors because of this reason.

IH Moore asked Dr. Gilliams if there was a written program on-site that is implemented in order to reduce or eliminate the hazards of occupational exposure to BBPs. [REDACTED] and advised IH Moore to speak to Phyllis Lee, Human Resource Business Partner; Dr. Gilliams provided contact information for Ms. Lee. IH Moore asked Dr. Gilliams to describe any engineering controls that were used to reduce or eliminate occupational exposure to BBPs. [REDACTED]

[REDACTED] It was explained that examination rooms were equipped with sharps containers for safe disposal of contaminated sharps. [REDACTED]

[REDACTED] IH Moore asked Dr. Gilliams who was responsible for collection of sharps containers and specimen containers. [REDACTED]

[REDACTED] IH Moore asked Dr. Gilliams to describe all work

practice controls used at the facility to prevent occupational exposure to BBPs. [REDACTED]

[REDACTED] IH Moore asked Dr. Gilliams what type of Personal Protective Equipment (PPE) is worn by employees who have occupational exposure to BBPs. [REDACTED]

[REDACTED] IH Moore asked Dr. Gilliams who was responsible for housekeeping of the facility. [REDACTED]

[REDACTED] Ms. Vines was scheduled off during the day of the inspection. Contact information for Ms. Vines was provided by Dr. Gilliams. IH Moore asked who was responsible for the collection of regulated waste; [REDACTED] IH

Moore asked Dr. Gilliams if employees were provided the hepatitis B vaccination. [REDACTED]

[REDACTED] IH Moore asked Dr. Gilliams in the event of a post exposure incident such as a needlestick injury, what were employees instructed to do. [REDACTED]

[REDACTED] IH Moore asked Dr. Gilliams whether there was a document or form that informs employees what to do in the event of a post exposure incident. [REDACTED] IH Moore asked Dr. Gilliams whether employees had received BBP training and if so, how often. [REDACTED]

[REDACTED] IH Moore informed Dr. Gilliams of the Occupational Safety and Health Standard (OSHA) 1910.1030 Bloodborne Pathogen Standard that required employers to reduce or eliminate the hazards of occupational exposure to BBPs by implementing a written Exposure Control Plan (ECP). [REDACTED]

[REDACTED] It was explained to Dr. Gilliams that the written ECP must be updated annually and shall include an exposure determination, engineering controls, work practices, PPE, Hepatitis B vaccination availability, availability of post-exposure evaluations and follow-up, the use of labels and signs to communicate hazards, BBP training, and maintaining medical and training records.

WALK-AROUND INSPECTION:

The walk-around inspection of Druid Sexual Health Clinic began promptly at 10:30AM following the opening conference. IH Moore was accompanied by Dr. Gilliams throughout the facility.

BBPs

IH Moore was escorted to the medication prep area where medical supplies were located that included, but were not limited to, medical carts, alcohol prep wipes, sharps container, BD 1-ml TB Syringes, 1% Lidocaine HCl Injection, BD 22-Gauge Precision Glides Needles, BD 5-ml Syringe, BD Plastipak 3-ml Syringe Luer-Lok Tip with Blunt Fill Needles, and Monoject Blunt Cannula 18-Gauge Needles. IH Moore also observed four BD Eclipse 21-Gauge Needles. The BD Eclipse 21-Gauge Needle offers protection against needlestick injuries and is used for injection and blood collection. There is a smart slip technology that helps to secure the connection to syringes. To use the BD Eclipse 21-Gauge Needle, the safety cover is pulled back towards the syringe and away from the needle. The needle shield is removed and medications are drawn per usual. If administration of an injection, the per usual protocol should be followed. Once the needle is contaminated, the safety cover is activated by centering of the thumb or forefinger on the textured finger pad area of the safety cover. The safety cover is pushed forward until a click is heard and the lock is felt after activation. The needle tip will remain secure inside of the activated cover. Once the needle tip is covered, the needle shall be discarded in a sharps container. IH Moore asked Dr. Gilliams since there were only four BD 21-Gauge Eclipse Needles observed in the medication prep area, were there additional needles that had safety devices to protect employees from needlestick injuries. [REDACTED]

[REDACTED] It was explained that a spring mechanism is activated by pushing a button on the device after the blood draw has been completed. The spring will retract the needle safely, ensuring that the needle is covered and secured. IH Moore asked Dr. Williams if there were more than four injections that needed to be administered, what would clinicians be instructed to do. Dr. Williams proceeded to inform Khannel Briddell, Laboratory Technician II, to go to the storage room to retrieve additional BD Eclipse Needles. [REDACTED]

[REDACTED] IH Moore and Dr. Gilliams were both escorted to the storage room by Ms. Briddell. BD Precision Glide 22-Gauge Needles, BD Vacutainer Eclipse Blood Collection Needles and Dynarex Hypodermic Needles were observed. Dr. Gilliams looked around in the storage room and was unable to find any additional needles with engineered sharps injury protection. IH Moore again asked Dr. Gilliams since there was no additional needles with engineered sharps injury protection, what were employees instructed to do if more than four injections would need to be administered during the workday. [REDACTED]

[REDACTED] During the inspection, Ashley Cunningham, Clinic Manager for the Baltimore City Health Department-Eastern Family Planning Clinic, brought a box of BD Eclipse Needles along with two medium Biohazard Specimen bags that contained BD Eclipse Needles. Revised March 2016

Ms. Hill provided IH Moore with a requisition dated for June 03, 2022 that indicated safety needles were requested. It was explained that non-safety needles such as Monoject Blunt Cannula 18-gauge needles were placed in the medication prep area for use; however, non-safety needles were not used due to the BD Eclipse Needles being available.

Examination rooms were observed to have labeled and color-coded leak-proof sharps containers. Handwashing facilities were made available in each examination room. PPE observed included but was not limited to Beesure Super Slim Nitrile Powder Free and StarMed Plus Nitrile Examination PF gloves. Surgical masks were observed during the walk-around inspection but

Respirator use was not observed. Medications observed for injections included but was not limited to Benzathine Penicillin (Bicillin), Ceftriaxone with Lidocaine and Gentamicin (used on rare occasions). IH Moore asked Dr. Gilliams who was responsible for laundry at the facility and IH Moore observed Cole Medical paper gowns and Avalon paper drapes used for examination tables. Birex Quat and Optim 33TB Wipes were observed.

It was further explained that the employees use either product multiple times a day and they are most often used at the registration desks, phlebotomy chairs, and the examination rooms.

Hazard Communication

During the walk-around inspection, IH Moore observed Birex Quat Wipes and Optim 33TB Wipes throughout the facility.

IH Moore asked Dr. Gilliams if there was a written program that informed employees of the hazardous chemicals in which they work with.

IH Moore asked Dr. Gilliams for the Safety Data Sheets (SDS) for Birex Quat Wipes and Optim 33TB Wipes.

According to the manufacturer's SDS for Birex Quat Wipes, the chemical is categorized as a category 2 chemical, capable of causing serious eye irritation, and a category 3 flammable liquid. According to the manufacturer's SDSs for Optim 33 TB Wipes, the chemical is not classified under any GHS hazard classes. IH Moore asked Dr. Gilliams if there was a list of all chemicals used by employees in the facility.

IH Moore asked Dr. Gilliams if employees had received training on the chemicals used to perform assigned job tasks.

IH Moore informed Dr. Gilliams that employees had the right to know the hazards associated with the chemicals in which they work with. IH Moore further explained that the Occupational Safety and Health Administration's (OSHA) 1910.200 Hazard Communication Standard required employers to have a written hazard communication program that included at a minimum, a written plan to indicate how hazard communication will be addressed at the facility, a list or inventory of all hazardous chemicals in the workplace, SDSs, container labeling, and training.

Workplace Hazard Assessment

During the walk-around inspection, IH Moore observed Beesure Super Slim Nitrile Powder Free Examination Gloves and StarMed Plus Power Free Nitrile Examination Gloves in the examination rooms and medication prep area. IH Moore asked Dr. Gilliams how personal protective equipment (PPE) selection was determined.

IH Moore asked Dr. Gilliams for the written hazard assessment certification.

IH Moore explained to Dr. Gilliams that employers are responsible for conducting a thorough walk-through of their establishment to determine all of the potential hazards that are associated with each job task and after doing so; a written hazard assessment certification must be completed and maintained at the workplace.

EMPLOYEE INTERVIEWS:

BBPs

IH Moore conducted in-person interviews with employees on June 03, 2022. Employees interviewed stated that there was an ongoing issue with the availability of safety needles. It was explained that clinicians have had to use Covidien Blunt Cannula 18-Gauge needles to administer injections when BD Eclipse needles are not available. Employees stated that safety needles were requested on numerous occasions and Dr. Gilliams has been made aware on many occasions. Employees stated that they had knowledge of the written BBP Exposure Control Plan but were

unaware of the location of the written BBP Exposure Control Plan. It was revealed during employee interviews that annual BBP training had not been provided.

Hazard Communication

Employees were had no knowledge of the whereabouts of the written hazard communication program. IH Moore showed employees Hazard Communication Standard Pictograms and employees were unable to identify pictograms. Employees stated that there were unaware of the contents of SDSs and stated there were no SDSs for chemicals used in the workplace.

RECORDS REVIEW

On June 03, 2022, the following items were requested:

- Legal Name Form (received June 09, 2022).
- Bloodborne Pathogen (BBP) Written Exposure Control Plan. (On June 21, 2022, IH Moore sent an email to Dr. Adena Greenbaum, Assistant Commissioner for Clinical Services, requesting the status of the document request that was sent on June 03, 2022. On June 22, 2022, Dr. Greenbaum sent the written BBP ECP. The written BBP ECP did not include an exposure determination for all employees who have exposure to BBPs.)
- BBP Training Records (On June 22, 2022, Dr. Greenbaum sent IH Moore an email that stated the last time employees received BBP training was in 2019 and explained that the clinic leadership was in the process of scheduling BBP training. Dr. Greenbaum also attached BBP training certificates with the email that was sent to IH Moore. Upon review of the BBP training certificates, employees did not receive BBP training in 2019; employees received BBP training on August 30, 2018.)
- Hepatitis B Vaccination Forms of all employees that are exposed to BBP (not received).
- Name and contact information of the contractor responsible for picking up BBP Regulated Waste (received on June 22, 2022).
- Name and contact information of the contractor responsible for sharps disposal (received on June 22, 2022).
- All requisitions that show requests for safety needles for the North Avenue location. (IH Moore received a requisition from Ms. Hall dated on 06/03/22. IH Moore was told by Dr. Gilliams that there were more requests that were put in prior to 06/03/22, release requisition was received dated 05/31/22 and 06/01/22 for safety needles).
- OSHA 300 Logs (OSHA 300 Logs received on June 22, 2022).
- Written Hazard Communication Program (Received on June 28, 2022. The written Hazard Communication Program received was not updated to the Globally Harmonized System (GHS) of Classification and Labeling of Chemicals to include information on SDSs, including the order of information and how employees can obtain and use the appropriate hazard information.)

CLOSING CONFERENCE NOTES:

A closing conference was conducted on July 05, 2022 at 12:30PM by IH Moore with Dr. Adena Greenbaum, Assistant Commissioner for Clinical Services, Ashley Cunningham, Clinic Manager, Nicole Robinson-Ezekwe, Bureau Administrator, Clinical Services, Jennifer Martin, Deputy Commissioner, and Kathleen Smith, Health Department Counsel. The complaint items, inspection findings, and recommendation of 3 Serious Citations and 3 Other-than-Serious Citations were discussed. The employer was provided with a copy of the MOSH Closing Conference Guide.

LETTER TO THE COMPLAINANT:

1. (Alleged Complaint) Possibly employees are exposed to bloodborne pathogens when handling contaminated sharps without safety devices.

Findings: MOSH Inspector, Sabrina Moore, conducted a walk-through of the facility on June 03, 2022. It was revealed that employees use BD 21-Gauge Eclipse Needles to administer injections of medication including, but not limited to, Benzathine Penicillin. Inspector Moore observed four BD Eclipse safety needles in the medication prep area. Employees interviewed stated that there has been an ongoing issue with the procurement process, which in turn causes a shortage of safety needles. The manufacturer of Benzathine Penicillin supplies safety needles with each injection, which employees have used to administer other medications including but not limited to Ceftriaxone and Gentamicin. Non-safety needles were placed in the medication prep area for use; however, employees used the manufacturer supplied Benzathine Penicillin safety needles. During the inspection, Ashley Cunningham, Clinic Manager for the Baltimore City Health

location, brought a box BD Eclipse 21-Gauge safety needles and 2-medium sized clear biohazard specimen bags with safety needles to the Druid Sexual Health Clinic. A requisition was observed dated on June 03, 2022 requesting a shipment of Magellan 22-Gauge Safety Needles with the desired date of 06/06/22.

Recommendations: No citations related to employees being exposed to bloodborne pathogens when handling contaminated sharps without safety devices.

Citations for items not related to the complaint were recommended.

PENALTY ADJUSTMENT CALCULATION

1. HISTORY ADJUSTMENT:

Place "%" in correct box

- A. Initial inspection/no previous employer history/previous inspections in compliance or only OTS violations cited.10%
- B. Previous inspection not in compliance with serious hazards, cited more than 36 months from this inspection (issuance to closing).5%
- C. All other scenarios of noncompliant activity.0%

5%

2. SIZE ADJUSTMENT:

- 1-25 employees60%
- 26-100 employees40%
- 101-250 employees20%
- 251 or more employees0%

0%

3. GOOD FAITH CALCULATIONS:

Y= Yes N= No
Select appropriate # for each box

A. Safety and Health Program and Training Program

Does the employer have a formal safety and health program and training program that:

1. Is in writing?Y=0; N=5
2. Provides for management commitment and employee involvement?Y=0; N=2
3. Provides for worksite analysis and hazard identification?Y=0; N=2
4. Provides for hazard prevention and control?Y=0; N=3
5. Provides appropriate training/instructions for hazards of work being done?Y=0; N=2
6. Has deficiencies that are only incidental?Y=0; N=1

5
2
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B. Employer's Injury and Illness Experience. Has the employer experienced any injuries or illnesses that appeared to be related to violations cited?Y=5; N=0

C. Supervision, Employer Concern and Knowledge. Did the employer demonstrate an appropriate level of supervision, concern and knowledge about safety and health requirements?Y=0; N=5

D. Increased Awareness of Violation. Is there any indication that the employer acted voluntarily with either intentional disregard of the standard or plain indifference to its safety obligations?Y=5; N=0

E. Abatement. Did the employer abate or mitigate most of the alleged violations during the inspection?Y=0; N=10

Good Faith Adjustment:

- 0-525%
- 6-1115%
- 11-205%
- 21-400%

TOTAL	16
Good Faith Adj.	5%

Total Penalty Adjustment Discount is found by adding the percentages for history, size and good faith.

100% minus Total Penalty Discount

TOTAL DISCOUNT %	10%
ADJF%	90%

Violation Worksheet

Print Date: August 8, 2022

		Inspection Number		1599735	
		Opt. Insp. Number		J8798-012-22	
Establishment Name	Mayor & City Council of Baltimore				
DBA Name	Baltimore City Health Department-Druid Sexual Health Clinic				
Type Of Violation	Serious	Citation Number	1	Item/Group	1/ a
Standard	1910.1200(g)(8)				
Alleged Violation Description	29 CFR 1910.1200(g)(8):The employer did not ensure that safety data sheets were readily accessible during each work shift to employees when they were in their work area(s): (a) Date of Violation: 06/03/22 Condition: Hazardous chemicals observed included, but were not limited to, Birex Quat Wipes, a category 2 chemical, capable of causing serious eye irritation and a category 3 flammable liquid. Abatement documentation (photographs, receipts, copies of programs, training certification, etc) is required for this item.				
Recommended Abatement Action					
# Instances	1	# Exposed	10		
Special Enforcement Type		Related Event Code (REC)			
General Duty Key Words		Employer's Relation to Hazard	All		
Photo/Video Number	11, 12	Substance Codes			

Penalty

Severity Factor	2	Samples Taken?	No
# of Workers Exposed	10	Frequency of Exposure	7
Employee Proximity	7	Stress/Working Conditions	1
Probability	6		
Gravity	4	Gravity based Penalty	\$2,000.00
# of Times Repeated		Multiplier	
Size	0%	Good Faith	5%
History	5% Decrease		
Calculated Penalty	\$1,800.00	Proposed Penalty	\$0.00
Proposed Penalty Justification	Public Sector		

Abatement Details

# Days to Abate	3 working days	Abatement Status	
Abatement Due Date		Date Abated	
Abatement Documentation Required?	No	Date Verified	
Abatement Completed Description			

Multi-Step Abatement

Type/Other Type	# Days to Abate	Abatement Due Date	Completed (Status)	Verify Date
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Employee Exposure

Violation Instance	# Exposed to Instance	Employer	Name and Address Telephone Numbers	Duration	Frequency	Proximity
		Baltimore City Health Department -Druid Sexual Health Clinic	Andrea Fische Home Phone: Personal Mobile:			
		Baltimore City Health Department -Druid Sexual Health Clinic	Shakia Hill Home Phone: [REDACTED]			
		Baltimore City Health Department -Druid Sexual Health Clinic	Suzanne Garcia [REDACTED]			
		Baltimore City Health Department -Druid Sexual Health Clinic	Khannel Briddell Home Phone: [REDACTED]			

Worksheet Details

A) Hazards-Operation/Condition-Accident: Employees work at the Baltimore City Health Department-Druid Sexual Health Clinic as Clinicians and Laboratory Technicians. Clinicians assigned job tasks include, but are not limited to, accessing patients, diagnosing patients, and treating patients with Sexually Transmitted Infections (STI) by administering medications through injections such as, Benzathine Pencillin, Ceftriaxone, and Gentamicin. Laboratory Technicians assigned job tasks include, but are not limited to, using needles and

syringes to withdraw blood for lab testing, prepare samples for lab testing, and wiping down frequently touched surfaces in the blood draw room and medication prep area, and taking inventory of medical supplies for the clinical staff, such as safety needles. Employees work 5 days a week for 8 hours a day. During the walk around inspection, IH Moore observed Birex Quat Wipes and Optim 33 TB Wipes. [REDACTED]

[REDACTED] staff members included, but were not limited to, clinicians, lab technicians, and front desk staff. It was further explained that wipes were most often used at the registration desk, phlebotomy chairs, and examination rooms. [REDACTED]

Employees are at the point of danger, under low stress conditions, when the employer did not ensure that safety data sheets were readily accessible during each work shift to employees when they were in their work areas.

B) Equipment: N/A

C) Location: N/A

D) Injury/Illness (and Justifications for Severity and Probability): Failure to maintain SDSs in the workplace could lead to employees being unaware of the potential hazards when working with a chemical or what to do in the event of chemical exposure.

Severity: Serious; employees worked with hazardous chemicals that included, but was not limited to, Birex Quat Wipes, a category 2 chemical capable of causing serious eye irritation and a category 3 flammable. Employees could incur injuries including, but not limited to, serious eye irritation. Employees directly handled Birex Quat Wipes without access to SDSs.

E) Measurements: N/A

F) Employer Knowledge: Dr. Gilliams, Medical Director, was aware and provided hazardous chemicals to employees to perform assigned job tasks. Dr. Gilliams indicated that there were SDSs made available to employees for chemicals used to perform assigned job tasks.

G) Comments: IH Moore informed Dr. Gilliams that employers are required to have SDSs in the workplace for each hazardous chemical in which employees use to perform assigned job tasks.

H) Other Employer Information: N/A

Violation Worksheet

Print Date: August 8, 2022

		Inspection Number		1599735	
		Opt. Insp. Number		J8798-012-22	
Establishment Name	Mayor & City Council of Baltimore				
DBA Name	Baltimore City Health Department-Druid Sexual Health Clinic				
Type Of Violation	Serious	Citation Number	1	Item/Group	1/ b
Standard	1910.1200(h)(3)(iv)				
Alleged Violation Description	29 CFR 1910.1200(h)(3)(iv):Employee training did not include the details of the hazardous communication program developed by the employer, including an explanation of labels received on shipped containers and the work place labeling system used by their employer, and the safety data sheet, including the order of information and how the employees can obtain and use the appropriate hazard information: (a) Date of Violation: 06/03/22 <i>cmw</i> Condition: Employees used Birex Quat Wipes to-wipes to disinfect frequently touched services, a category 2 chemical, capable of causing serious eye irritation and a category 3 flammable liquid, where employees were not trained regarding the new label elements and safety data sheets format.				
Recommended Abatement Action					
# Instances	1	# Exposed	10		
Special Enforcement Type		Related Event Code (REC)			
General Duty Key Words		Employer's Relation to Hazard	All		
Photo/Video Number	11, 12	Substance Codes			

Penalty

Severity Factor	2	Samples Taken?	No
# of Workers Exposed	10	Frequency of Exposure	7
Employee Proximity	7	Stress/Working Conditions	1
Probability	6		
Gravity	4	Gravity based Penalty	\$2,000.00
# of Times Repeated		Multiplier	
Size	0%	Good Faith	5%
History	5% Decrease		
Calculated Penalty	\$0.00	Proposed Penalty	\$0.00
Proposed Penalty Justification			

Abatement Details

# Days to Abate	20 working days	Abatement Status	
Abatement Due Date		Date Abated	
Abatement Documentation Required?	No	Date Verified	
Abatement Completed Description			

Multi-Step Abatement

Type/Other Type	# Days to Abate	Abatement Due Date	Completed (Status)	Verify Date
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Employee Exposure

Violation Instance	# Exposed to Instance	Employer	Name and Address Telephone Numbers	Duration	Frequency	Proximity
		Baltimore City Health Department -Druid Sexual Health Clinic	Andrea Fische Home Phone: Personal Mobile:			
		Baltimore City Health Department -Druid Sexual Health Clinic	Shakia Hill Home Phone:			
		Baltimore City Health Department -Druid Sexual Health Clinic	Suzanne Garcia			
		Baltimore City Health Department -Druid Sexual Health Clinic	Khannel Briddell Home Phone:			

Worksheet Details

A) Hazards-Operation/Condition-Accident: Employees work at the Baltimore City Health Department-Druid Sexual Health Clinic as Clinicians and Laboratory Technicians. Clinicians assigned job tasks include, but are not limited to, accessing patients, diagnosing patients, and treating patients with Sexually Transmitted Infections (STI) by administering medications through injections such as, Benzathine Pencillin, Ceftriaxone,

and Gentamicin. Laboratory Technicians assigned job tasks include, but are not limited to, using needles and syringes to withdraw blood for lab testing, prepare samples for lab testing, and wiping down frequently touched surfaces in the blood draw room and medication prep area, and taking inventory of medical supplies for the clinical staff, such as safety needles. Employees work 5 days a week for 8 hours a day. During the walk around inspection, IH Moore observed Birex Quat Wipes and Optim 33 TB Wipes. Dr. Elizabeth Gilliams, Medical Director, stated that all staff members used either product to disinfect frequently touched areas multiple times a day. Staff members included, but were not limited to, clinicians, lab technicians, and front desk staff. It was further explained that wipes were most often used at the registration desk, phlebotomy chairs, and examination rooms. [REDACTED]

[REDACTED] It was revealed during employee interviews that employees did not know the contents on SDSs, and were unable to identify GHS Hazard Pictograms. Employees are at the point of danger, under low stress conditions, where employees were not trained regarding the new label elements and safety data sheets format.

B) Equipment: N/A

C) Location: N/A

D) Injury/Illness (and Justifications for Severity and Probability): Failure to maintain at the workplace a written hazard communication program that was updated to the Globally Harmonized System could lead to employees handling chemicals without knowledge of the hazards associated with specific chemicals.

Severity: Other-than-Serious; administrative requirement.

E) Measurements: N/A

F) Employer Knowledge: Dr. Gilliams was aware and provided the chemicals for employees to use to disinfect frequently touched surfaces.

G) Comments: IH Moore informed Dr. Gilliams on the necessity of having an updated written hazard communication program and providing comprehensive, updated training.

H) Other Employer Information: N/A

Violation Worksheet

Print Date: August 8, 2022

		Inspection Number	1599735		
		Opt. Insp. Number	J8798-012-22		
Establishment Name	Mayor & City Council of Baltimore				
DBA Name	Baltimore City Health Department-Druid Sexual Health Clinic				
Type Of Violation	Other-than-Serious	Citation Number	2	Item/Group	1
Standard	1910.132(d)(2)				
Alleged Violation Description	29 CFR 1910.132(d)(2):The employer did not verify, through a written certification, the identity of the workplace evaluated, the person certifying that the evaluation had been performed, and the date the hazard assessment was done: (a) Date of Violation: 06/03/22				
Recommended Abatement Action					
# Instances	1	# Exposed	4		
Special Enforcement Type		Related Event Code (REC)			
General Duty Key Words		Employer's Relation to Hazard	All		
Photo/Video Number		Substance Codes			

Penalty

Severity Factor	1	Samples Taken?	No
# of Workers Exposed	4	Frequency of Exposure	1
Employee Proximity	1	Stress/Working Conditions	1
Probability	1		
Gravity	1	Gravity based Penalty	\$500.00
# of Times Repeated		Multiplier	
Size	0%	Good Faith	5%
History	5% Decrease		
Calculated Penalty	\$450.00	Proposed Penalty	\$0.00
Proposed Penalty Justification	Public Sector		

Abatement Details

# Days to Abate	3 working days	Abatement Status	
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Abatement Due Date		Date Abated	
Abatement Documentation Required?	No	Date Verified	
Abatement Completed Description			

Multi-Step Abatement

Type/Other Type	# Days to Abate	Abatement Due Date	Completed (Status)	Verify Date
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Employee Exposure

Violation Instance	# Exposed to Instance	Employer	Name and Address Telephone Numbers	Duration	Frequency	Proximity
		Baltimore City Health Department -Druid Sexual Health Clinic	Andrea Fische Home Phone: Personal Mobile:			
		Baltimore City Health Department -Druid Sexual Health Clinic	Shakia Hill Home Phone: [REDACTED]			
		Baltimore City Health Department -Druid Sexual Health Clinic	Suzanne Garcia [REDACTED]			
		Baltimore City Health Department -Druid Sexual Health Clinic	Khannel Briddell Home Phone: [REDACTED]			

Worksheet Details

A) Hazards-Operation/Condition-Accident: During the walk-around inspection, IH Moore observed Beesure Super Slim Nitrile Powder Free Examination Gloves and StarMed Plus Powder Free Nitrile Examination Gloves in the examination rooms and medication prep area. IH Moore asked Dr. Elizabeth Gilliams, Medical Director how personal protective equipment (PPE) selection was determined [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED] IH Moore asked Dr. Gilliams for the written hazard assessment certification. [REDACTED]
[REDACTED] IH Moore explained to Dr.

Gilliams that employers are responsible for conducting a thorough walk-through of their establishment to determine all of the potential hazards that are associated with each job task and after doing so; a written hazard assessment certification must be completed and maintained at the workplace. Employees are at the fringe of the danger zone, under low stress conditions, when the employer does not verify that the required workplace hazard assessment had been performed through written certification.

B) Equipment: N/A

C) Location: N/A

D) Injury/Illness (and Justifications for Severity and Probability): Other-than-Serious; administrative requirement.

E) Measurements: N/A

F) Employer Knowledge: Dr. Elizabeth Gilliams, Medical Director, stated that a hazard assessment had been conducted; however, a written hazard assessment certification had not been maintained.

G) Comments: IH Moore informed Dr. Gilliams of the requirement for employers to have a written hazard assessment certification for the workplace.

H) Other Employer Information: N/A

Violation Worksheet

Print Date: August 8, 2022

		Inspection Number		1599735	
		Opt. Insp. Number		J8798-012-22	
Establishment Name	Mayor & City Council of Baltimore				
DBA Name	Baltimore City Health Department-Druid Sexual Health Clinic				
Type Of Violation	Other-than-Serious	Citation Number	2	Item/Group	2
Standard	1910.1030(c)(1)(iv)				
Alleged Violation Description	29 CFR 1910.1030(c)(1)(iv): The Exposure Control Plan was not reviewed and updated at least annually and whenever necessary as required. (a) Date of Violation: 06/03/22 Condition: Employees were potentially exposed to bloodborne pathogens while using needles to administer medications by injection and while drawing blood for laboratory testing.				
Recommended Abatement Action					
# Instances	1	# Exposed	4		
Special Enforcement Type		Related Event Code (REC)	Complaint		
General Duty Key Words		Employer's Relation to Hazard	All		
Photo/Video Number	3, 4, 5, 6, 7, 8, 9, 10	Substance Codes			

Penalty

Severity Factor	1	Samples Taken?	No
# of Workers Exposed	4	Frequency of Exposure	7
Employee Proximity	7	Stress/Working Conditions	1
Probability	4		
Gravity	2	Gravity based Penalty	\$1,000.00
# of Times Repeated		Multiplier	
Size	0%	Good Faith	5%
History	5% Decrease		
Calculated Penalty	\$900.00	Proposed Penalty	\$0.00
Proposed Penalty Justification	Public Sector		

Abatement Details

# Days to Abate	3 working days	Abatement Status	
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Abatement Due Date		Date Abated	
Abatement Documentation Required?	No	Date Verified	
Abatement Completed Description			

Multi-Step Abatement

Type/Other Type	# Days to Abate	Abatement Due Date	Completed (Status)	Verify Date
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Employee Exposure

Violation Instance	# Exposed to Instance	Employer	Name and Address Telephone Numbers	Duration	Frequency	Proximity
		Baltimore City Health Department -Druid Sexual Health Clinic	Andrea Fische Home Phone: Personal Mobile:			
		Baltimore City Health Department -Druid Sexual Health Clinic	Suzanne Garcia [REDACTED]			
		Baltimore City Health Department -Druid Sexual Health Clinic	Khannel Briddell Home Phone: [REDACTED]			

Worksheet Details

A) Hazards-Operation/Condition-Accident: Employees work at the Baltimore City Health Department-Druid Sexual Health Clinic as Clinicians and Laboratory Technicians. Clinicians assigned job tasks include, but are not limited to, accessing patients, diagnosing patients, and treating patients with Sexually Transmitted Infections (STI) by administering medications through injections such as, Benzathine Penicillin, Ceftriaxone, and Gentamicin. Laboratory Technicians assigned job tasks include, but are not limited to, using needles and syringes to withdraw blood for lab testing, prepare samples for lab testing, and wiping down frequently touched surfaces in the blood draw room and medication prep area, and taking inventory of medical supplies for the clinical staff, such as safety needles. Employees work 5 days a week for 8 hours a day. IH Moore requested the written Bloodborne Pathogen (BBP) Exposure Control Plan (ECP) from Dr. Elizabeth Gilliams, Medical Director. Dr. Gilliams advised IH Moore to speak with Phyllis Lee, Human Resource Business Partner. Ms. Lee provided the written BBP ECP that had not been updated to include employees working on the clinical side of the Baltimore City Health Department, such as clinical staff. Employees are at the point of danger, under low stress conditions, where the employer did not update the Exposure Control Plan at least annually and whenever necessary as required.

B) Equipment: N/A

C) Location: N/A

D) Injury/Illness (and Justifications for Severity and Probability): Severity: Other-than-Serious;
Administrative requirement.

E) Measurements: N/A

F) Employer Knowledge: Dr. Gilliams, Medical Director, was responsible for the general oversight of the facility and directed the activities of the clinical staff. Dr. Gilliams was aware that employees were potentially exposed to BBPs.

G) Comments: IH Moore informed Dr. Gilliams that the written BBP ECP would need to include all employees who are exposed to BBPs

H) Other Employer Information: N/A

Violation Worksheet

Print Date: August 8, 2022

		Inspection Number		1599735	
		Opt. Insp. Number		J8798-012-22	
Establishment Name	Mayor & City Council of Baltimore				
DBA Name	Baltimore City Health Department-Druid Sexual Health Clinic				
Type Of Violation	Other-than-Serious	Citation Number	2	Item/Group	3
Standard	1910.1030(g)(2)(ii)(B)				
Alleged Violation Description	29 CFR 1910.1030(g)(2)(ii)(B):The employer did not ensure that the training was provided to employees with occupational exposure at least annually: (a) Date of Violation: June 03, 2022 Condition: Employees were potentially exposed to bloodborne pathogens while using needles to administer medications by injection and while drawing blood for laboratory testing, where training was last provided in 2019. Abatement documentation (photographs, receipts, copies of programs, training certification, etc.) is required for this item.				
Recommended Abatement Action					
# Instances	1	# Exposed	4		
Special Enforcement Type		Related Event Code (REC)	Complaint		
General Duty Key Words		Employer's Relation to Hazard	All		
Photo/Video Number	3, 4, 5, 6, 7, 8, 9, 10	Substance Codes			

Penalty

Severity Factor	1	Samples Taken?	No
# of Workers Exposed	4	Frequency of Exposure	7
Employee Proximity	7	Stress/Working Conditions	1
Probability	4		
Gravity	2	Gravity based Penalty	\$1,000.00
# of Times Repeated		Multiplier	
Size	0%	Good Faith	5%
History	5% Decrease		
Calculated Penalty	\$900.00	Proposed Penalty	\$0.00
Proposed Penalty Justification	Public Sector		

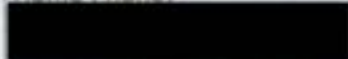
Abatement Details

# Days to Abate	20 working days	Abatement Status	
Abatement Due Date		Date Abated	
Abatement Documentation Required?	No	Date Verified	
Abatement Completed Description			

Multi-Step Abatement

Type/Other Type	# Days to Abate	Abatement Due Date	Completed (Status)	Verify Date
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Employee Exposure

Violation Instance	# Exposed to Instance	Employer	Name and Address Telephone Numbers	Duration	Frequency	Proximity
		Baltimore City Health Department -Druid Sexual Health Clinic	Andrea Fische Home Phone: Personal Mobile:			
		Baltimore City Health Department -Druid Sexual Health Clinic	Suzanne Garcia 			
		Baltimore City Health Department -Druid Sexual Health Clinic	Khannel Briddell Home Phone: 			

Worksheet Details

A) Hazards-Operation/Condition-Accident: Employees work at the Baltimore City Health Department-Druid Sexual Health Clinic as Clinicians and Laboratory Technicians. Clinicians assigned job tasks include, but are not limited to, accessing patients, diagnosing patients, and treating patients with Sexually Transmitted Infections (STI) by administering medications through injections such as, Benzathine Penicillin, Ceftriaxone, and Gentamicin. Laboratory Technicians assigned job tasks include, but are not limited to, using needles and syringes to draw patient blood for lab testing, prepare samples for lab testing, and wiping down frequently touched surfaces in the blood draw room and medication prep area, and taking inventory of medical supplies for the clinical staff, such as safety needles. Employees work 5 days a week for 8 hours a day. IH Moore requested BBP training records for employees who have occupational exposure to BBPs. Dr. Adena Greenbaum, Assistant Commissioner for the Baltimore City Health Department, stated that employees had not been provided BBP training since 2019 and further explained that BBP training is currently being scheduled. Employees are at the point of danger, under low stress conditions, when the employer did not ensure that each employee with occupational exposure participated in a training program.

B) Equipment: N/A

C) Location: N/A

D) Injury/Illness (and Justifications for Severity and Probability): Employees were at an increased risk of exposure to blood borne pathogens (BBPs) when the employer does not provide BBP training designed to eliminate or minimize occupational exposure.

Severity: Other than serious; employees had received initial training but had not received annual training since before the pandemic.

E) Measurements: N/A

F) Employer Knowledge: Dr. Gilliams, Medical Director, was responsible for the general oversight of the facility and directed the activities of the clinical staff. Dr. Gilliams was aware that employees were potentially exposed to BBPs.

G) Comments: IH Moore informed Dr. Gilliams that employees who have occupational exposure to BBPs shall receive initial BBP training at the start of employment and annually thereafter.

H) Other Employer Information: N/A

Violation Worksheet

Print Date: August 8, 2022

	Inspection Number	1599735		
	Opt. Insp. Number	J8798-012-22		
Establishment Name	Mayor & City Council of Baltimore			
DBA Name	Baltimore City Health Department-Druid Sexual Health Clinic			
Type Of Violation	Other-than-Serious	Citation Number	2	Item/Group 4
Standard	1910.1200(e)(1)(i)			
Alleged Violation Description	29 CFR 1910.1200(e)(1)(i):The employer did not compile a list of the hazardous chemicals known to be present using a product identifier that was referenced on the appropriate safety data sheets: (a) Date of Violation: 06/03/22 Condition: Hazardous chemicals observed included, but were not limited to, Birex Quat Wipes, a category 2 chemical, capable of causing serious eye irritation and a category 3 flammable liquid.			
Recommended Abatement Action				
# Instances	1	# Exposed	10	
Special Enforcement Type		Related Event Code (REC)		
General Duty Key Words		Employer's Relation to Hazard	All	
Photo/Video Number	11, 12	Substance Codes		

Penalty

Severity Factor	1	Samples Taken?	No
# of Workers Exposed	10	Frequency of Exposure	7
Employee Proximity	7	Stress/Working Conditions	1
Probability	6		
Gravity	3	Gravity based Penalty	\$1,500.00
# of Times Repeated		Multiplier	
Size	0%	Good Faith	5%
History	5% Decrease		
Calculated Penalty	\$1,350.00	Proposed Penalty	\$0.00
Proposed Penalty Justification	Public Sector		

Abatement Details

# Days to Abate	3 working days	Abatement	
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		Status	
Abatement Due Date		Date Abated	
Abatement Documentation Required?	No	Date Verified	
Abatement Completed Description			

Multi-Step Abatement

Type/Other Type	# Days to Abate	Abatement Due Date	Completed (Status)	Verify Date
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Employee Exposure

Violation Instance	# Exposed to Instance	Employer	Name and Address Telephone Numbers	Duration	Frequency	Proximity
		Baltimore City Health Department -Druid Sexual Health Clinic	Andrea Fische Home Phone: Personal Mobile:			
		Baltimore City Health Department -Druid Sexual Health Clinic	Shakia Hill Home Phone: [REDACTED]			
		Baltimore City Health Department -Druid Sexual Health Clinic	Suzanne Garcia [REDACTED]			
		Baltimore City Health Department -Druid Sexual Health Clinic	Khannel Briddell Home Phone: [REDACTED]			

Worksheet Details

A) Hazards-Operation/Condition-Accident: Employees work at the Baltimore City Health Department-Druid Sexual Health Clinic as Clinicians and Laboratory Technicians. Clinicians assigned job tasks include, but are not limited to, accessing patients, diagnosing patients, and treating patients with Sexually Transmitted Infections (STI) by administering medications through injections such as, Benzathine Penicillin, Ceftriaxone, and Gentamicin. Laboratory Technicians assigned job tasks include, but are not limited to, using needles and syringes to withdraw blood for lab testing, prepare samples for lab testing, and wiping down frequently touched surfaces in the blood draw room and medication prep area, and taking inventory of medical supplies for the clinical staff, such as safety needles. Employees work 5 days a week for 8 hours a day. During the

walk around inspection. IH Moore observed Birex Quat Wipes and Optim 33 TB Wipes. [REDACTED]

[REDACTED] Staff members included, but was not limited to, clinicians, lab technicians, and front desk staff. It was further explained that wipes were most often at the registration desks, phlebotomy chairs, and examination rooms.

[REDACTED] Employees are at the point of danger, under low stress conditions, when employer did not compile a list of the hazardous chemicals known to be present using a product identifier that was referenced on the appropriate safety data sheets.

B) Equipment: N/A

C) Location: N/A

D) Injury/Illness (and Justifications for Severity and Probability): Failure to develop and maintain a chemical inventory list could lead to unknown chemicals being used by employees in the workplace.

Severity: Other-than-Serious; administrative requirement.

E) Measurements: N/A

F) Employer Knowledge: Dr. Gilliams was aware and provided the chemicals for employees to use to disinfect frequently touched surfaces.

G) Comments: IH Moore informed Dr. Gilliams that the Occupational Safety and Health Administration (OSHA) hazard communication standard required employers to have a written hazard communication program that included, at a minimum, Safety Data Sheets, information on container labeling, training, and a chemical inventory list.

H) Other Employer Information: N/A

Maryland Occupational Safety and Health

Inspection Number: 1599735	COSHO ID: J8798	Case Number: J8798-012-22	Date: 13 July 2022
Employer: Baltimore City Health Department-Druid Sexual Health Clinic		Page 1 of 6	
		Photo ID #: 1	Date: 03 June 2022
		Location (Photo & Photographer): 1515 W North Ave Baltimore, MD 21217 Taken by: IH Moore	
		Description: Main entrance to the Baltimore City Health Department-Druid Sexual Health Clinic.	
		Photo ID #: 2	Date: 03 June 2022
		Location (Photo & Photographer): Patient Waiting Area Taken by: IH Moore	
		Description: Patient Waiting Area where patients wait to be seen by Clinical Staff.	

Maryland Occupational Safety and Health

Inspection Number: 1599735	COSHO ID: J8798	Case Number: J8798-012-22	Date: 13 July 2022
Employer: Baltimore City Health Department-Druid Sexual Health Clinic		Page 3 of 6	
		Photo ID #: 5	Date: 03 June 2022
		Location (Photo & Photographer): Medication Prep Area	
		Taken by: IH Moore	
		Description: BD Eclipse 21-Gauge Needle with safety cover. During the walk-around inspection, IH Moore observed 4 safety needles in the medication prep area. IH Moore asked Dr. Gilliams what were clinicians to use if the BD Eclipse safety needles had run out.	
		Photo ID #: 6	Date: 03 June 2022
		Location (Photo & Photographer): Storage Room	
		Taken by: IH Moore	
		Description: Entrance to the storage room where medical supplies are located.	

Maryland Occupational Safety and Health

Inspection Number: 1599735	COSHO ID: J8798	Case Number: J8798-012-22	Date: 13 July 2022
Employer: Baltimore City Health Department-Druid Sexual Health Clinic		Page 5 of 6	
		Photo ID #: 9	Date: 03 June 2022
		Location (Photo & Photographer): Conference Room	
		Taken by: IH Moore	
		Description: Biohazard Specimen Bags containing BD Eclipse Safety Needles. During the inspection, Ashley Cunningham, Clinic Manager for the Baltimore City Health Department-Eastern Family Planning Clinic, brought a box of BD Eclipse Needles along with two medium Biohazard Specimen bags that contained BD Eclipse Needles.	
		Photo ID #: 10	Date: 03 June 2022
		Location (Photo & Photographer): Conference Room	
		Taken by: IH Moore	
		Description: Biohazard Specimen Bags containing BD Eclipse Safety Needles. During the inspection, IH Moore requested the written BBP Exposure Control Plan (ECP). [REDACTED] [REDACTED] IH Moore did observe a written BBP ECP in the STAT Laboratory during the walk-around inspection. On June 27, 2022, Phyllis Lee, Human Resource Business Partner emailed IH Moore the written BBP ECP that did not contain an exposure determination for all staff members who have occupational exposure to BBPs.	

Maryland Occupational Safety and Health

Inspection Number: 1599735	COSHO ID: J8798	Case Number: J8798-012-22	Date: 13 July 2022
Employer: Baltimore City Health Department-Druid Sexual Health Clinic		Page 2 of 6	
		Photo ID #: 3	Date: 03 June 2022
		Location (Photo & Photographer): Medication Prep Area	
		Taken by: IH Moore	
		Description: Medication Prep Area. Medical cart with supplies that included, but was not limited to, alcohol prep wipes, sharps container, BD 1-ml Syringes, BD 22-Gauge Precision Glides Needles, BD 5-ml Syringes, BD Plastipak 3-ml Syringe Luer-Lok Tip with Blunt Fill Needles, BD Eclipse 21-Gauge Needles, and Monoject Blunt Cannula 18-Gauge Needles.	
		Photo ID #: 4	Date: 03 June 2022
		Location (Photo & Photographer): Medication Prep Area	
		Taken by: IH Moore	
		Description: BD Eclipse Safety Needles that are used to administer medications including, but not limited to, Benzathine Penicillin, Ceftriaxone, and Gentamicin. During the walk-around inspection, there were 4 needles with engineered sharps injury protection.	

Maryland Occupational Safety and Health

Inspection Number: 1599735	COSHO ID: J8798	Case Number: J8798-012-22	Date: 13 July 2022
Employer: Baltimore City Health Department-Druid Sexual Health Clinic		Page 4 of 6	
		Photo ID #: 7	Date: 03 June 2022
		Location (Photo & Photographer): Storage Room	
		Taken by: IH Moore	
		Description: Additional needles observed in the storage room included, but was not limited to, BD Precision Glide 22-Gauge Needles, BD Vacutainer Eclipse Blood Collection Needles and Dynarex Hypodermic Needles were observed. Dr. Gilliams looked around in the storage room and was unable to find any additional needles with engineered sharps injury protection.	
		Photo ID #: 8	Date: 03 June 2022
		Location (Photo & Photographer): Conference Room	
		Taken by: IH Moore	
		Description: During the inspection, Ashley Cunningham, Clinic Manager for the Baltimore City Health Department-Eastern Family Planning Clinic, brought a box of BD Eclipse Needles along with two medium Biohazard Specimen bags that contained BD Eclipse Needles.	

NOTIFICATION: UNPROGRAMMED INSPECTION

To: Regional Supervisor, Cristina Campbell

From: Assistant Chief of Compliance, Mark Broadwater

Date Emailed: 5/31/2022

Employer: Baltimore Health Department – Sexual Health Clinic

Site Address: 1515 West North Avenue, Baltimore, MD 21217

UPA Number: F1142/1899779

Complaint- X

Referral-

Accident-

Fatality-

Please note this inspection must be opened by: 6/6/2022

Source Information 1			
Source Type	Employee	If Other, Specify	
Complaint Name		Phone	
Complaint Address			
Complaint E-mail Address			
Send UPA Results?	Yes	Reason if no UPA results sent	
Signature		Date	
Organization Name		Title	

OFFICIAL USE ONLY:

RID	0352420	Complaint Closed?	No
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Receipt Information					
Received By	I4454	Receipt Date	05/31/2022	CSHO Assigned	Sup Assigned
		Receipt Time	09:30 AM	J8798	C9954
Receipt Type	Online	Electronic Complaint Number	E-0077-22		

Complaint Evaluation			
Formality	Subject	Severity	Discrimination
Formal	Safety		
	Health	Serious	
# Alleged Hazards		# Employees Exposed	

Complaint Actions					
Action Date	Action Type	Date Response Due	Communication Method	Type of Letter/Reason	Other – Status
05/31/2022	Contact with Source	06/07/2022	Phone Discussion	Acknowledgement-Receipt of	

Maryland Occupational Safety and Health

Inspection Number: 1599735	COSHO ID: J8798	Case Number: J8798-012-22	Date: 13 July 2022								
Employer: Baltimore City Health Department-Druid Sexual Health Clinic		Page 6 of 6									
 BIOTROL™ SAFETY DATA SHEET		Photo ID #: 11	Date: 03 June 2022								
		Location (Photo & Photographer):									
		Taken by: IH Moore									
		Description: Birex Quat Wipes SDS. According to the manufacturer's SDS, the chemical is characterized as a category 3 flammable liquid, a category 2 chemical, capable of causing serious eye irritation, and category 3 specific target organ toxicity.									
SECTION 1 – IDENTIFICATION											
<u>Product Identifier</u> Product Name: Birex® Quat Wipes Product Code: 295507 <u>Recommended Use of the Chemical and Restrictions for Use</u> Recommended Use: Cleaner, Disinfectant, Deodorizer Restrictions for Use: Use only as directed. <u>Details of the Supplier</u> Manufactured for: Biotrol 13705 Shoreline Court East Earth City, MO 63045 1-800-822-8550 <u>Emergency Phone Number</u> 24-Hour Number: 1-800-535-5053 International: 1-352-323-3500											
SECTION 2 – HAZARDS IDENTIFICATION											
<u>Classification</u> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 5px;"> <thead> <tr> <th style="width: 60%;">Hazard Class</th> <th style="width: 40%;">Category</th> </tr> </thead> <tbody> <tr> <td>Flammable liquid</td> <td>3</td> </tr> <tr> <td>Eye irritation</td> <td>2A</td> </tr> <tr> <td>Specific target organ toxicity (single exposure)</td> <td>3</td> </tr> </tbody> </table>				Hazard Class	Category	Flammable liquid	3	Eye irritation	2A	Specific target organ toxicity (single exposure)	3
Hazard Class	Category										
Flammable liquid	3										
Eye irritation	2A										
Specific target organ toxicity (single exposure)	3										
<u>Label Elements</u> Hazard Symbols(s):   Signal Word(s): Warning Hazard Statement(s): Flammable liquid and vapor. Causes serious eye irritation.											
		Photo ID #: 12	Date: 03 June 2022								
		Location (Photo & Photographer):									
		Taken by: IH Moore									
		Description: Hazard Identification for Birex Quat Wipes.									

Notice of Alleged Safety or Health Hazards

July 13, 2022 9:40 AM

Complaint Number	1899779		
Establishment Name / DBA	Baltimore Health Department		
Site Address	Sexual Health Clinic 1515 West North Avenue BALTIMORE, MD 21217		
	Site Phone		Site FAX
Mailing Address	1515 West North Avenue Baltimore, MD 21217		
Management Official		Phone	
Type of Business		E-mail	
Ownership	Private Sector	Site Activity NAICS	923120 -Administration of Public Health Programs
HAZARD DESCRIPTION/LOCATION. Describe briefly the hazard(s) which you believe exist. Include the approximate number of employees exposed to or threatened by each hazard. Specify the particular building or worksite where the alleged violation exists.			
Possibly employees are exposed to bloodborne pathogens when handling contaminated sharps without safety devices.			

				Complaint	
05/31/2022	Valid = Y				
05/31/2022	Do Inspection = Y				

Complaint Responses				
Date Response Received	Type Response Received	Evaluation	Evaluated By	Other

Transfer Information			
Transfer to Category		Transfer To OSHA RID	
Transfer Date		Transfer to Name	

Program Information	
National Emphasis	
Local/State-Emphasis	
State Strategic Initiatives	

Additional Codes			
Code Type	Code ID	Code Value	Code Description

MOSH Complaint Number: **E-0077-22**
Submitted: 05/31/2022 09:09 AM

MOSH Online Complaint Form

1. **Company Name:**
2. **Company Mailing Address:**
- Street Address:**
- City:**
- State:** **Zip:**
- County:**
3. **Worksite Location:** Is worksite location different from Company Mailing Address ? ☐ YES ☒ NO
4. **Company Telephone Number:** **Ext:**
5. **Management Official in Charge:**
6. **Type of Business:**

7. Description of occupational safety or health hazard. Describe each occupational safety or health hazard to which you believe employees are exposed. Indicate the approximate number of employees exposed to or threatened by each hazard.*

The clinic is not reliably supplied with needles that either retract, or may be covered after withdrawal from a person. The manufacturer of one medicine supplies the required safety needle.

The Sexual Health clinic at the health department does not a reliable supplier of safety needles for providing other injections. Additionally, the department responsible for ordering clinic supplies is frequently unable to adequately supply the required clinical equipment.

This matter has been investigated by the Baltimore City Inspector General (<https://www.baltimoresun.com/health/bs-hs-druid-heights-health-clinic-ig-report-20210929-yqyf5l6qz5fnrbho5ex7bomte-story.html>).

8. Hazard location. Identify the specific building, room, or worksite where each alleged hazard is located.*

1515 West North Avenue, Sexual Health Clinic, 2nd floor, Baltimore, MD 21217

9. This condition has been brought to the attention of: (Choose all that apply)

- ☒ Employer
☒ Other Government agency (specify)

Inspector General Baltimore City

10. The undersigned complainant is a(n):*

- ☒ Current Employee
☐ Former Employee
☐ Employer
☐ Immediate Relative of a Current Employee (i.e Spouse, Parent) Specify:
☐ Authorized Representative of Employees (you **must** indicate the organization and your title)
☐ Other: (Specify)

10a. For current employee, immediate relative, or authorized representative of employee only. Please indicate your desire:*

- ☒ Do **NOT** reveal my name to my Employer
☐ My name may be revealed to my Employer

11. Complainant Name:

First Name*

Last Name*

12. Complainant Home or Cell Phone Number:*

13. Complainant Home Mailing Address:*

Street Address:*

City:*

State:*

14. Complainant Email Address:*

15. Signature:

I believe there is a violation of a safety or health standard, a danger that threatens physical harm, or an "imminent danger" exists.

16. ☒ This constitutes my electronic signature.*

If this box is checked, this submission shall be considered as an authorized written signature.

Maryland Occupational Safety and Health

Supporting Documentation Contents Page

Case Number: J8798-012-22

1	BBP Exposure Control Plan (ECP) received on June 22, 2022. During the walk-around inspection, IH Moore observed the BBP ECP on-site in the BDC laboratory. IH Moore informed Dr. Greenbaum and Dr. Gilliams that the BBP ECP should include an exposure determination for all employees who have occupational exposure to BBPs.
2	Employee BBP Training Records. Employees were last provided training on August 30, 2018. Dr. Greenbaum indicated that employees were not provided annual BBP training and stated that clinic leadership was in the process of scheduling BBP training.
3	Purchase Order for Magellan 22-gauge Safety Needles dated on 06/06/22.
4	Release Requisition dated 05/31/22 and 06/01/22 for Safety Needles.
5	OSHA 300 Logs from 2018-2021
6	Written Hazard Communication Program (IH Moore informed Dr. Greenbaum and Dr. Gilliams that the written hazard communication program had not been updated to the Globally Harmonized System of Classification and Labeling of Chemicals.)
7	Safety Data Sheet (SDS) Birex Quat Wipes
8	SDS Optim 33 TB Wipes