

U.S. Department of Labor
Occupational Safety and Health Administration
701 Route 73 South
Building 2, Suite 120
Marlton, NJ 08053
Phone: 856-596-5200 Fax: 856-596-5201



Citation and Notification of Penalty

To:
COOPER UNIVERSITY HOSPITAL
and its successors
ONE COOPER PLAZA
Camden, NJ 08103

Inspection Number: 1100618
Inspection Date(s): 10/22/2015 – 04/08/2016
Issuance Date: 04/08/2016

Inspection Site:
ONE COOPER PLAZA
Camden, NJ 08103

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 Citation and Notification of Penalty (this Citation) describes violations of the Occupational Safety and Health Act of 1970. 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 proposed, unless within 15 working days (excluding weekends and Federal holidays) from your receipt of this Citation and Notification of Penalty **you either call to schedule an informal conference (see paragraph below) or you mail a notice of contest** to the U.S. Department of Labor Area Office at the address shown above. Please refer to the enclosed booklet (OSHA 3000) which outlines your rights and responsibilities and which should be read in conjunction with this form. 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 is affirmed by the Review Commission or a court.

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 Federal holidays), whichever is longer.

Informal Conference - An informal conference is not required. However, if you wish to have such a conference you may request one with the Area Director during the 15 working day contest period. During such an informal conference you may present any evidence 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 to contest after the informal conference, should you decide to do so. Please keep in mind that a written letter of intent to contest must be submitted to the Area Director 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 the 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, we can enter into an informal settlement agreement which amicably resolves 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 proposed penalties and/or abatement dates without contesting the underlying violations. **Unless you inform the Area Director in writing that you intend to contest the citation(s) and/or proposed penalty(ies) within 15 working days after receipt, the citation(s) and the proposed penalty(ies) will become a final order of the Occupational Safety and Health Review Commission and may not be reviewed by any court or agency.**

Penalty Payment – Penalties are due within 15 working days of receipt of this notification unless contested. (See the enclosed booklet and the additional information provided related to the Debt Collection Act of 1982.) Make your check or money order payable to “DOL-OSHA”. Please indicate the Inspection Number on the remittance. You can also make your payment electronically on www.pay.gov. On the left side of the pay.gov homepage, you will see an option to Search Public Forms. Type “OSHA” and click Go. From the results, click on **OSHA Penalty Payment Form**. The direct link is:

<https://www.pay.gov/paygov/forms/formInstance.html?agencyFormId=53090334>.

You will be required to enter your inspection number when making the payment. Payments can be made by credit card or Automated Clearing House (ACH) using your banking information. Payments of \$25,000 or more require a Transaction ID, and also must be paid using ACH. If you require a Transaction ID, please contact the OSHA Debt Collection Team at (202) 693-2170.

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

Notification of Corrective Action – For each violation which you do not contest, you must provide ***abatement certification*** to the Area Director of the OSHA office issuing the citation and identified above. This abatement certification is to be provided by letter within 10 calendar days after each abatement date. Abatement certification includes the date and method of abatement. If the citation indicates that the violation was corrected during the inspection, no abatement certification is required for that item. The abatement certification letter must be posted at the location where the violation appeared and the corrective action took place or employees must otherwise be effectively informed about abatement activities. A sample abatement certification letter is enclosed with this Citation. In addition, where the citation indicates that ***abatement documentation*** is necessary, evidence of the purchase or repair of equipment, photographs or video, receipts, training records, etc., verifying that abatement has occurred is required to be provided to the Area Director.

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 U.S. Department of Labor Area Office at the address shown above.

Employer Rights and Responsibilities – The enclosed booklet (OSHA 3000) outlines additional employer rights and responsibilities and should be read in conjunction with this notification.

Notice to 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 U.S. Department of Labor Area Office at the address shown above and postmarked within 15 working days (excluding weekends and Federal holidays) of the receipt by the employer of this Citation and Notification of Penalty.

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. 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.



NOTICE TO EMPLOYEES OF INFORMAL CONFERENCE

An informal conference has been scheduled with OSHA to discuss the citation(s) issued on 04/07/2016. The conference will be held by telephone or at the OSHA office located at 701 Route 73 South, Building 2, Suite 120, Marlton, NJ 08053 on _____ at _____.

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

CERTIFICATION OF CORRECTIVE ACTION WORKSHEET

Inspection Number: 1100618

Company Name: COOPER UNIVERSITY HOSPITAL
Inspection Site: ONE COOPER PLAZA, Camden, NJ 08103
Issuance Date: 04/07/2016

List the specific method of correction for each item on this citation in this package that does not read "Corrected During Inspection" and return to: **U.S. Department of Labor – Occupational Safety and Health Administration, 701 Route 73 South, Building 2, Suite 120, Marlton, NJ 08053**

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

I certify that the information contained in this document is accurate and that the affected employees and their representatives have been informed of the abatement.

Signature

Date

Typed or Printed Name

Title

NOTE: 29 USC 666(g) whoever knowingly makes any false statements, representation or certification in any application, record, plan or other documents filed or required to be maintained pursuant to the Act shall, upon conviction, be punished by a fine of not more than \$10,000 or by imprisonment of not more than 6 months or both.

POSTING: A copy of completed Corrective Action Worksheet should be posted for employee review



Citation and Notification of Penalty

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The alleged violations below have been grouped because they involve similar or related hazards that may increase the potential for injury or illness.

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

29 CFR 1910.132(f)(1)(i): The employer did not provide training to each employee who is required by this section to use PPE on knowing when PPE is necessary:

a) Throughout facility: The employer did not provide training to employees conducting the following tasks, including, but not limited to, emptying JP drains, clearing ventilators, labor and delivery, cleaning tracheotomies, clearing PEG and NG tubes, removing IV lines and emptying Foley bags to know that eye and or face protection was required, on or about 10/22/15.

NOTE: IN ADDITION TO ABATEMENT CERTIFICATION, THE EMPLOYER IS REQUIRED TO SUBMIT ABATEMENT DOCUMENTATION FOR THIS ITEM. FAILURE TO COMPLY WILL RESULT IN AN ADDITIONAL PENALTY OF \$1000.00 IN ACCORDANCE WITH 29 CFR 1903.19.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	05/03/2016
Proposed Penalty:	\$7,000.00

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: COOPER UNIVERSITY HOSPITAL
Inspection Site: ONE COOPER PLAZA, Camden, NJ 08103

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

29 CFR 1910.1030(g)(2)(vii)(E): The bloodborne pathogens training program did not contain an explanation of the appropriate methods for recognizing tasks or other activities that might involve exposure to blood or other potentially infectious materials:

a) Throughout facility: The bloodborne pathogen training program did not contain an explanation of the appropriate methods for recognizing tasks that might involve exposure to blood or other potentially infectious materials, such as, but not limited to, emptying JP drains, clearing ventilators, labor and delivery, cleaning tracheotomies, clearing PEG and NG tubes, removing IV lines and emptying Foley bags, on or about 10/22/15.

NOTE: IN ADDITION TO ABATEMENT CERTIFICATION, THE EMPLOYER IS REQUIRED TO SUBMIT ABATEMENT DOCUMENTATION FOR THIS ITEM. FAILURE TO COMPLY WILL RESULT IN AN ADDITIONAL PENALTY OF \$1000.00 IN ACCORDANCE WITH 29 CFR 1903.19.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

05/03/2016



Citation and Notification of Penalty

Company Name: COOPER UNIVERSITY HOSPITAL
Inspection Site: ONE COOPER PLAZA, Camden, NJ 08103

Citation 1 Item 2 Type of Violation: **Serious**

29 CFR 1910.1030(c)(1)(iv)(B): The review and update of the exposure control plan did not document annually consideration and implementation of appropriate commercially available and effective safer medical devices designed to eliminate or minimize occupational exposure:

- a) Throughout facility: The employer's review of the blood borne pathogen exposure control plan did not include a review of commercially available insulin needles with effective safer medical devices. Employees have received needle stick injuries as a result of using the currently available Becton Dickinson 40 and 100 unit needles with a self-sheathing device that is difficult to close. Commercially available insulin needles with retractable needles were available and not considered for use, on or about 10/22/15.
- b) Emergency Department: The employer's review of the blood borne pathogen exposure control plan did not include a review of commercially available 14 gauge IV catheter needles with effective safer medical devices. Employees used Jelco 14 gauge IV catheter needles that did not have an engineering control in place to cover the needle after use, on or about 10/22/15.
- c) Throughout facility: The employer's review of the blood borne pathogen exposure control plan did not include a review of commercially available arterial blood gas needles with effective safer medical devices. Employees used Marquest Quik A.B.G. syringes whose engineering control was separated from the device and required the employees to use a one-handed method to recap. Commercially available arterial blood gas needles with attached engineering controls were available and not considered for use, on or about 10/22/15.

NOTE: IN ADDITION TO ABATEMENT CERTIFICATION, THE EMPLOYER IS REQUIRED TO SUBMIT ABATEMENT DOCUMENTATION FOR THIS ITEM. FAILURE TO COMPLY WILL RESULT IN AN ADDITIONAL PENALTY OF \$1000.00 IN ACCORDANCE WITH 29 CFR 1903.19.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

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Citation 1 Item 3 Type of Violation: **Serious**

29 CFR 1910.1030(d)(2)(i): Engineering and work practice controls were not used to eliminate or minimize employee's exposure:

a) Operating rooms: The employer did not institute engineering or work practice controls for employees that passed contaminated sharps to and from the surgeon. Employees have received puncture injuries as a result of the techniques used, on or about 10/22/15.

b) Throughout facility: The employer did not institute engineering or work practice controls for employees using suture needles. Employees have received puncture injuries as a result of the techniques used, on or about 10/22/15.

NOTE: IN ADDITION TO ABATEMENT CERTIFICATION, THE EMPLOYER IS REQUIRED TO SUBMIT ABATEMENT DOCUMENTATION FOR THIS ITEM. FAILURE TO COMPLY WILL RESULT IN AN ADDITIONAL PENALTY OF \$1000.00 IN ACCORDANCE WITH 29 CFR 1903.19.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	05/03/2016
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Citation and Notification of Penalty

Company Name: COOPER UNIVERSITY HOSPITAL
Inspection Site: ONE COOPER PLAZA, Camden, NJ 08103

Citation 1 Item 4 Type of Violation: **Serious**

29 CFR 1910.1030(d)(3)(x): Masks in combination with eye protection devices, such as goggles or glasses with solid side shields, or chin-length face shields, were not worn whenever splashes, spray, spatter or droplets of blood or other potentially infectious materials were generated and eye, nose or mouth contamination was reasonably anticipated:

a) Throughout facility: Masks, in combination with eye protection devices, were not worn whenever splashes, spray spatter or droplets of blood or other potentially infectious materials were generated when employees conducted such tasks as, but not limited to, emptying JP drains, clearing ventilators, labor and delivery, cleaning tracheotomies, clearing PEG and NG tubes, removing IV lines and emptying Foley bags, on or about 10/22/15.

NOTE: IN ADDITION TO ABATEMENT CERTIFICATION, THE EMPLOYER IS REQUIRED TO SUBMIT ABATEMENT DOCUMENTATION FOR THIS ITEM. FAILURE TO COMPLY WILL RESULT IN AN ADDITIONAL PENALTY OF \$1000.00 IN ACCORDANCE WITH 29 CFR 1903.19.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	05/03/2016
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Citation and Notification of Penalty

Company Name: COOPER UNIVERSITY HOSPITAL
Inspection Site: ONE COOPER PLAZA, Camden, NJ 08103

Citation 1 Item 5 Type of Violation: **Serious**

29 CFR 1910.1030(d)(4)(iii)(A)(1): Contaminated sharps were not immediately discarded in containers that were closable, puncture resistant, leak proof and labeled or color-coded according paragraph g(1)(i) of this standard:

- a) Dishwashing area kitchen: Contaminated sharps were found on trays that were brought back to the department from patient rooms, on or about 10/22/15.
- b) Keleman 7 pediatrics: An environmental services employee was stuck by a contaminated needle while changing the sheets on a mattress, on or about 10/22/15.
- c) Laundry chute rooms: Contaminated sharps were found in bags of contaminated linens when removed from the chute rooms by environmental services employees, on or about 10/22/15.
- d) Patient care rooms: Contaminated sharps were found in regular trash receptacles and on floors when being cleaned by environmental services employees, on or about 10/22/15.

NOTE: THE EMPLOYER IS REQUIRED TO SUBMIT ABATEMENT CERTIFICATION FOR THIS ITEM. FAILURE TO COMPLY WILL RESULT IN AN ADDITIONAL PENALTY OF \$1000.00 IN ACCORDANCE WITH 29 CFR 1903.19.

Date By Which Violation Must be Abated: 05/03/2016
Proposed Penalty: \$5,000.00

U.S. Department of Labor
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Inspection Site: ONE COOPER PLAZA, Camden, NJ 08103

Citation 1 Item 6 Type of Violation: **Serious**

29 CFR 1910.1030(d)(4)(iii)(A)(2)(iii): During use, containers for contaminated sharps were not replaced routinely or were allowed to be overfilled:

a) Throughout facility: Contaminated sharps containers were full requiring employees to carry used sharps to other locations for disposal, on or about 10/22/15.

NOTE: THE EMPLOYER IS REQUIRED TO SUBMIT ABATEMENT CERTIFICATION FOR THIS ITEM. FAILURE TO COMPLY WILL RESULT IN AN ADDITIONAL PENALTY OF \$1000.00 IN ACCORDANCE WITH 29 CFR 1903.19.

Date By Which Violation Must be Abated:
Proposed Penalty:

05/03/2016
\$5,000.00

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U.S. Department of Labor
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Citation and Notification of Penalty

Company Name: COOPER UNIVERSITY HOSPITAL
Inspection Site: ONE COOPER PLAZA, Camden, NJ 08103

Citation 1 Item 7 Type of Violation: **Serious**

29 CFR 1910.1052(d)(1)(i): Where methylene chloride was present in the workplace, the employer did not determine each employee's exposure:

a) Carpenter shop: The employer did not conduct exposure monitoring for employees spraying Sta' Put S120, which contained 75-90% methylene chloride, when manufacturing countertops, on or about 10/22/15.

NOTE: THE EMPLOYER IS REQUIRED TO SUBMIT ABATEMENT CERTIFICATION FOR THIS ITEM. FAILURE TO COMPLY WILL RESULT IN AN ADDITIONAL PENALTY OF \$1000.00 IN ACCORDANCE WITH 29 CFR 1903.19.

Date By Which Violation Must be Abated:
Proposed Penalty:

05/03/2016
\$5,000.00

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Citation and Notification of Penalty

Company Name: COOPER UNIVERSITY HOSPITAL
Inspection Site: ONE COOPER PLAZA, Camden, NJ 08103

The alleged violations below have been grouped because they involve similar or related hazards that may increase the potential for injury or illness.

Citation 1 Item 8 a Type of Violation: **Serious**

29 CFR 1910.1052(k)(1)(iii): The employer did not include methylene chloride in the hazard communication program established to comply with hazard communication standard (HCS) (1910.1200) and did not ensure each employee was trained in accordance with the requirements of HCS and paragraph (l) of this section:

a) Carpenter shop: The employer did not include information on methylene chloride in the hazard communication training for employees using Sta' Put S120, which contained 75-90% methylene chloride, when manufacturing countertops, on or about 10/22/15.

NOTE: THE EMPLOYER IS REQUIRED TO SUBMIT ABATEMENT CERTIFICATION FOR THIS ITEM. FAILURE TO COMPLY WILL RESULT IN AN ADDITIONAL PENALTY OF \$1000.00 IN ACCORDANCE WITH 29 CFR 1903.19.

Date By Which Violation Must be Abated:
Proposed Penalty:

05/03/2016
\$5,000.00

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Citation and Notification of Penalty

Company Name: COOPER UNIVERSITY HOSPITAL
Inspection Site: ONE COOPER PLAZA, Camden, NJ 08103

Citation 1 Item 8 b Type of Violation: **Serious**

29 CFR 1910.1052(l)(1): The employer did not provide information and training for each affected employee prior to or at the time of initial assignment to a job involving potential exposure to methylene chloride:

a) Carpenter shop: The employer did not provide information and training for methylene chloride to employees using Sta' Put S120, which contained 75-90% methylene chloride, when manufacturing countertops, on or about 10/22/15.

NOTE: THE EMPLOYER IS REQUIRED TO SUBMIT ABATEMENT CERTIFICATION FOR THIS ITEM. FAILURE TO COMPLY WILL RESULT IN AN ADDITIONAL PENALTY OF \$1000.00 IN ACCORDANCE WITH 29 CFR 1903.19.

Date By Which Violation Must be Abated:

05/03/2016

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: COOPER UNIVERSITY HOSPITAL
Inspection Site: ONE COOPER PLAZA, Camden, NJ 08103

The alleged violations below have been grouped because they involve similar or related hazards that may increase the potential for injury or illness.

Citation 1 Item 9 a Type of Violation: **Serious**

29 CFR 1910.1200(f)(6)(i): Except as provided in 29 CFR 1910.1200(f)(7) and 29 CFR 1910.1200(f)(8), the employer did not ensure that each container of hazardous chemicals in the workplace was labeled, tagged or marked with the information required by 29 CFR 1910.1200(f)(1)(i) through 29 CFR 1910.1200(f)(1)(v):

a) Carpenter shop: Spray bottles containing bleach, a corrosive chemical, and denatured alcohol were not labeled according to the standard, on or about 10/22/15.

NOTE: THE EMPLOYER IS REQUIRED TO SUBMIT ABATEMENT CERTIFICATION FOR THIS ITEM. FAILURE TO COMPLY WILL RESULT IN AN ADDITIONAL PENALTY OF \$1000.00 IN ACCORDANCE WITH 29 CFR 1903.19.

Date By Which Violation Must be Abated:	05/03/2016
Proposed Penalty:	\$5,000.00



Citation and Notification of Penalty

Company Name: COOPER UNIVERSITY HOSPITAL
Inspection Site: ONE COOPER PLAZA, Camden, NJ 08103

Citation 1 Item 9 b Type of Violation: **Serious**

29 CFR 1910.1200(h)(1): Employees were not provided effective information and training on hazardous chemicals in their work area at the time of their initial assignment and whenever a new hazard that the employees had not been previously trained about was introduced into their work area:

a) Central Sterile Processing: A temporary employee was not provided training on the hazardous chemicals used in the work area, including, but not limited to STERRAD Cassettes and S40 Sterilant Concentrate and Cavicide and Rapicide PA Parts A and B, corrosive chemicals, on or about 10/22/15.

NOTE: THE EMPLOYER IS REQUIRED TO SUBMIT ABATEMENT CERTIFICATION FOR THIS ITEM. FAILURE TO COMPLY WILL RESULT IN AN ADDITIONAL PENALTY OF \$1000.00 IN ACCORDANCE WITH 29 CFR 1903.19.

Training for temporary employees shall include the requirements of 29 CFR 1910.1200, methods to detect release or presence of chemicals in the workplace, the physical and health hazards of the chemicals, measures the employees can take to protect themselves and the employer's hazard communication program.

Date By Which Violation Must be Abated:

05/03/2016



Citation and Notification of Penalty

Company Name: COOPER UNIVERSITY HOSPITAL
Inspection Site: ONE COOPER PLAZA, Camden, NJ 08103

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

29 CFR 1904.29(b)(1): 29 CFR 1904.29(b)(1): A log of all recordable work-related injuries and illnesses (OSHA Form 300 or equivalent), was not completed in the detail as required by the regulation:

Throughout facility: The employer did not fill out columns E and F on the OSHA 300 log in detail describing the cause of the injury/illness, the actual resulting injury/illness and the location for the following cases:

- a) Keleman 9 South and basement: On 10/9/15 two entries were listed as exposure, body meningitis. There was no description as to how the exposures occurred or the injury/illness.
- b) Operating room: On 10/9/15 one entry was listed as strain, left shoulder. There was no description as to how the injury occurred or what caused the injury.
- c) Keleman 9 South and Keleman basement: On 10/9/15 six entries were listed as exposure body meningitis. There was no description as to how the exposure occurred or the injury/illness.
- d) Location unknown: On 10/9/15 one entry was listed as exposure, body, patient. There was no description as to what substance the employee was exposed to or the injury/illness. The location was also not listed.
- e) Pavilion 9: On 10/13/15 one entry was listed as strain, left shoulder, patient. There was description as to how the injury occurred.
- f) Location unknown: On 10/14/15 one entry was listed as exposure, face, body fluid. There was description as to what substance the employee was exposed to or the injury/illness. The location was also not listed.
- g) Dorrance 3rd floor hall: On 10/14/15 one entry was listed as fall, left knee, wet floor. There was no description as to the injury/illness.

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



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h) Location unknown: On 10/18/15 one entry was listed as exposure, arms, patient in labor. There was no description as to what substance the employee was exposed to or the injury/illness. The location was also not listed.

i) Location unknown: On 10/20/15 two entries were listed as exposure, face/eyes ileostomy bag/tube. There was no description as to the injury/illness or the cause of the exposures. The locations were also not listed.

j) Location unknown: On 10/20/15 one entry was listed as exposure, hands, fluids. There was no description as to what substance the employee was exposed to, the injury/illness or the cause of the exposure. The location was also not listed.

k) Location unknown: On 10/21/15 one entry was listed as exposure, face, JP drain. There was no description as to what substance the employee was exposed to, the injury/illness or the cause of the exposure. The location was also not listed.

l) Location unknown. On 10/21/15 one entry was listed as exposure, face, body. There was no description as to what substance the employee was exposed to, the injury/illness or the cause of the exposure. The location was also not listed.

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Date By Which Violation Must be Abated:
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05/03/2016
\$1,000.00



Citation and Notification of Penalty

Company Name: COOPER UNIVERSITY HOSPITAL
Inspection Site: ONE COOPER PLAZA, Camden, NJ 08103

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

29 CFR 1904.31(b)(2): The employer did not record injuries or illnesses for temporary employees that they supervised on a daily basis on their OSHA 300 logs:

a) Operating room: The employer did not record an injury that occurred on 10/26/15 when a temporary employee received a puncture wound when changing a staple in a contaminated staple gun.

NOTE: THE EMPLOYER IS REQUIRED TO SUBMIT ABATEMENT CERTIFICATION FOR THIS ITEM. FAILURE TO COMPLY WILL RESULT IN AN ADDITIONAL PENALTY OF \$1000.00 IN ACCORDANCE WITH 29 CFR 1903.19.

Date By Which Violation Must be Abated:
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05/03/2016
\$1,000.00



Citation and Notification of Penalty

Company Name: COOPER UNIVERSITY HOSPITAL
Inspection Site: ONE COOPER PLAZA, Camden, NJ 08103

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

29 CFR 1910.134(f)(2): Employee(s) using tight-fitting face piece respirators were not fit tested whenever a different respirator face piece (size, style, model or make) was used:

a) Emergency department: The employer did not ensure that temporary employees were fit tested on the same make and model of N95 respirators used in the facility, including the 3M 1860 and Moldex 1513, on or about 10/22/15.

NOTE: THE EMPLOYER IS REQUIRED TO SUBMIT ABATEMENT CERTIFICATION FOR THIS ITEM. FAILURE TO COMPLY WILL RESULT IN AN ADDITIONAL PENALTY OF \$1000.00 IN ACCORDANCE WITH 29 CFR 1903.19.

Date By Which Violation Must be Abated:
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\$0.00

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

29 CFR 1910.1030(g)(1)(i)(A): Warning labels were not affixed to containers of regulated waste, refrigerators, or freezers containing blood or other potentially infectious material:

a) Dishwashing area kitchen: A sharps container mounted on the wall across from the automatic dishwashing machine was not labeled with a biohazard symbol or color coded according to the standard, on or about 10/22/15.

NOTE: THE EMPLOYER IS REQUIRED TO SUBMIT ABATEMENT CERTIFICATION FOR THIS ITEM. FAILURE TO COMPLY WILL RESULT IN AN ADDITIONAL PENALTY OF \$1000.00 IN ACCORDANCE WITH 29 CFR 1903.19.

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\$0.00

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: COOPER UNIVERSITY HOSPITAL
Inspection Site: ONE COOPER PLAZA, Camden, NJ 08103

Citation 2 Item 5 Type of Violation: **Other-than-Serious**

29 CFR 1910.1030(g)(2)(vii)(J): The bloodborne pathogens training program did not contain information on the appropriate actions to take or persons to contact in an emergency involving blood or other potentially infectious materials:

- a) Central Sterile Processing: The employer did not provide training to temporary employees on the protocol to follow for exposures to blood or other potentially infectious material, on or about 10/22/15.
- b) Patient care areas: The employer did not provide training to temporary employees on the protocol to follow for exposures to blood or other potentially infectious material, on or about 10/22/15.

NOTE: THE EMPLOYER IS REQUIRED TO SUBMIT ABATEMENT CERTIFICATION FOR THIS ITEM. FAILURE TO COMPLY WILL RESULT IN AN ADDITIONAL PENALTY OF \$1000.00 IN ACCORDANCE WITH 29 CFR 1903.19.

Date By Which Violation Must be Abated:
Proposed Penalty:

05/03/2016
\$0.00



Citation and Notification of Penalty

Company Name: COOPER UNIVERSITY HOSPITAL
Inspection Site: ONE COOPER PLAZA, Camden, NJ 08103

Citation 2 Item 6 Type of Violation: **Other-than-Serious**

29 CFR 1910.1030(h)(5)(i)(A): The employer did not maintain a sharps injury log that contained at a minimum the type and brand of device involved in the incident:

a) Throughout facility: The employer did not list the brand of needle involved in the exposure incidents listed on the sharps injury log, on or about 10/22/15.

NOTE: THE EMPLOYER IS REQUIRED TO SUBMIT ABATEMENT CERTIFICATION FOR THIS ITEM. FAILURE TO COMPLY WILL RESULT IN AN ADDITIONAL PENALTY OF \$1000.00 IN ACCORDANCE WITH 29 CFR 1903.19.

Date By Which Violation Must be Abated:
Proposed Penalty:

05/03/2016
\$0.00

A handwritten signature in black ink, appearing to read "Paula Dixon-Roderick", written over a horizontal line.

Paula Dixon-Roderick
Area Director

U.S. Department of Labor
Occupational Safety and Health Administration
701 Route 73 South
Building 2, Suite 120
Marlton, NJ 08053
Phone: 856-596-5200 Fax: 856-596-5201



INVOICE / DEBT COLLECTION NOTICE

Company Name: COOPER UNIVERSITY HOSPITAL
Inspection Site: ONE COOPER PLAZA, Camden, NJ 08103
Issuance Date: 04/07/2016

Summary of Penalties for Inspection Number	1100618
Citation 1, Serious	\$53,000.00
Citation 2, Other-than-Serious	\$2000.00
TOTAL PROPOSED PENALTIES	\$55,000.00

To avoid additional charges, please remit payment promptly to this Area Office for the total amount of the uncontested penalties summarized above. Make your check or money order payable to: "DOL-OSHA". Please indicate OSHA's Inspection Number (indicated above) on the remittance. You can also make your payment electronically on www.pay.gov. On the left side of the pay.gov homepage, you will see an option to Search Public Forms. Type "OSHA" and click Go. From the results, click on **OSHA Penalty Payment Form**. The direct link is <https://www.pay.gov/paygov/forms/formInstance.html?agencyFormId=53090334>. You will be required to enter your inspection number when making the payment. Payments can be made by credit card or Automated Clearing House (ACH) using your banking information. Payments of \$25,000 or more require a Transaction ID, and also must be paid using ACH. If you require a Transaction ID, please contact the OSHA Debt Collection Team at (202) 693-2170.

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

If a personal check is issued, it will be converted into an electronic fund transfer (EFT). This means that our bank will copy your check and use the account information on it to electronically debit your account for the amount of the check. The debit from your account will then usually occur within 24 hours and will be shown on your regular account statement. You will not receive your original check back. The bank will destroy your original check, but will keep a copy of it. If the EFT cannot be completed because of insufficient funds or closed

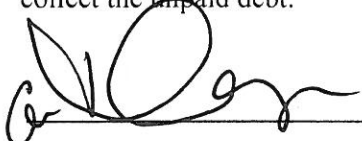
account, the bank will attempt to make the transfer up to 2 times.

Pursuant to the Debt Collection Act of 1982 (Public Law 97-365) and regulations of the U.S. Department of Labor (29 CFR Part 20), the Occupational Safety and Health Administration is required to assess interest, delinquent charges, and administrative costs for the collection of delinquent penalty debts for violations of the Occupational Safety and Health Act.

Interest: Interest charges will be assessed at an annual rate determined by the Secretary of the Treasury on all penalty debt amounts not paid within one month (30 calendar days) of the date on which the debt amount becomes due and payable (penalty due date). The current interest rate is one percent (1%). Interest will accrue from the date on which the penalty amounts (as proposed or adjusted) become a final order of the Occupational Safety and Health Review Commission (that is, 15 working days from your receipt of the Citation and Notification of Penalty), unless you file a notice of contest. Interest charges will be waived if the full amount owed is paid within 30 calendar days of the final order.

Delinquent Charges: A debt is considered delinquent if it has not been paid within one month (30 calendar days) of the penalty due date or if a satisfactory payment arrangement has not been made. If the debt remains delinquent for more than 90 calendar days, a delinquent charge of six percent (6%) per annum will be assessed accruing from the date that the debt became delinquent.

Administrative Costs: Agencies of the Department of Labor are required to assess additional charges for the recovery of delinquent debts. These additional charges are administrative costs incurred by the Agency in its attempt to collect an unpaid debt. Administrative costs will be assessed for demand letters sent in an attempt to collect the unpaid debt.



Paula Dixon-Roderick

Area Director

4/8/2016
Date