

ENVIRONMENTAL HEALTH AND SAFETY

Case Western Reserve University, Department of Environmental Health
and Safety Annual report covering 2024-2025

Annual Report
2024-2025

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Mission Statement

The Case Western Reserve University Department of Environmental Health and Safety is committed to safeguarding our environment and university community.

Through diligent regulatory compliance and innovative practices, we respect and support the diverse needs of our personnel and the academic objectives of our research community.

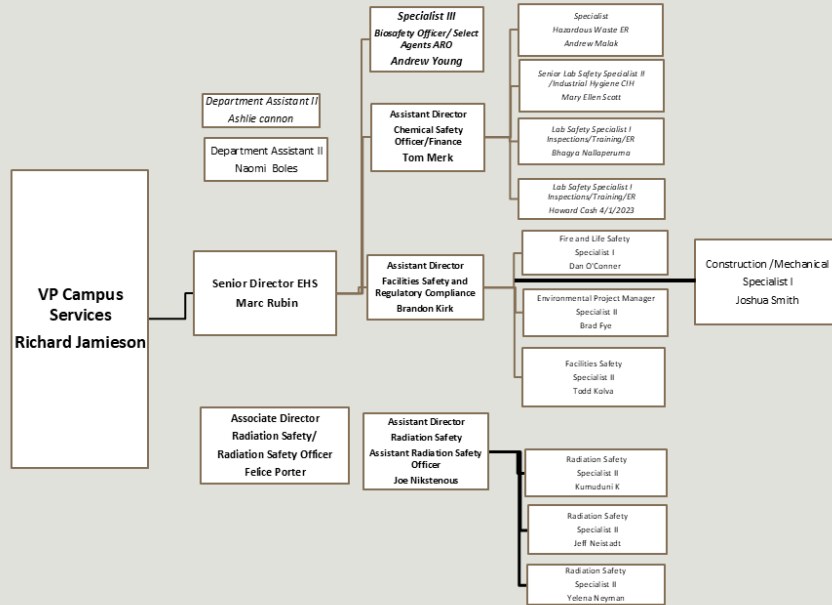
Our mission is to uphold and enhance the health and safety of the Case Western Reserve University community by delivering essential support, expertise, and training, ensuring a safe and healthy environment conducive to excellence in education and research

Executive Summary

The Department of Occupational and Environmental Safety at CWRU has experienced a dynamic phase of growth and innovation. Noteworthy developments include refinement of our inspection program, incorporating real-time data access and photographic documentation to improve the transparency and effectiveness of our safety checks. Streamlined online safety training to reduce the burden to the community for in person classes. Additionally, we've proactively enhanced safety across student-led groups and theatre safety by developing targeted safety programs. These collective efforts underscore our commitment to ensuring a safe and compliant environment for all members of the CWRU community, reinforcing our unwavering dedication to safety and excellence in all aspects of campus life

EHS Organizational Chart 2024-2025

EHS Organizational Chart 2024-2025



DEPARTMENT DESCRIPTION

The Department of Environmental Health and Safety (EHS) at Case Western Reserve University (CWRU) is dedicated to fostering a secure and healthy environment for over 6,000 employees and 10,000 undergraduate and graduate students across more than 130 buildings at CWRU and five other major research locations in Northeastern Ohio. Our reach extends globally, sharing the commitment to safety with CWRU personnel at international sites.

EHS is tasked with harmonizing stringent federal, state, and local safety regulations with the dynamic needs of academic research. This often requires innovative solutions to reconcile the goals of a safe working environment with a productive research community. Our approach is customer-centric, moving away from traditional regulatory practices to engage more interactively with our stakeholders, including faculty, staff, and students.

We ensure the dissemination of safety information through formal training comprised of nearly 12,000 contact hours annually, consultation, occupational monitoring, environmental monitoring, and the creation and maintenance of safety and regulatory documents. These activities are supported by thorough inspection, audit, post approval monitoring, and program oversight, which serve as critical feedback mechanisms for assessing compliance and understanding within the community.

Despite our comprehensive safety measures, unexpected incidents can occur in complex environments. In such events, EHS provides immediate emergency response and hazard mitigation. We also engage in proactive planning to prevent future incidents, collaborating with internal teams like emergency management, plant operations, police, and security, as well as external agencies. These partnerships are essential for developing cohesive emergency response strategies and familiarizing external bodies with our institutional capabilities, thereby laying the groundwork for effective collaborative responses to emergencies.

Additionally, EHS collaborates with internal and external teams to ensure that all construction, property acquisition, renovation, and other remedial activities thoroughly identify, communicate, and mitigate potential occupational and environmental hazards.

The department comprises ten specialized sub-groups focused on Biological, Chemical, Facilities, Fire/Life Safety, Construction, Theater/Student Group safety, mechanical safety, and Radiation safety, ensuring a broad and inclusive approach to health and safety at CWRU.

Year in review

The Department of Occupational and Environmental Safety has continued its growth in the areas of training, audit, community outreach, and initiation of new student safety and theatre programs.

We've also refined our training outreach by identifying and eliminating redundancies in the process and expanding our online 24/7 training access through canvas. Now, we recognize and accept equivalent training completed at other institutions for personnel and students who work exclusively off-campus.

Looking ahead, we are thrilled to announce the launch of a new infection control training program for the Dental Clinic in the 2024-2025 academic year. This program is designed to ensure a smooth transition from the previous instructor and to continuously elevate our training standards, reinforcing our unwavering dedication to safety and excellence in clinical practice. The Dental school has continued its commitment to safety training in 2024-2025.

EHS has thoroughly revitalized its inspection program, incorporating advanced features that allow for real-time recording and retrieval of data directly from the field. This immediate access to data enhances our responsiveness and accuracy in addressing safety concerns. We have solidified our inventory processes to maintain a continuously updated list of locations requiring inspections, ensuring that no area is overlooked and enhancing the overall efficiency of our safety checks.

Moreover, we have enriched the inspection reports by including photographs, which create a comprehensive narrative of each space inspected. This visual documentation not only improves the transparency of our inspections but also significantly aids in understanding and resolving issues more effectively. Further we have brought back the report summaries for chairs and deans available prior to COVID.

In our commitment to continuous improvement, we actively collaborate with faculty, students, and staff to ensure that any recurring safety issues receive additional attention. This collaborative approach helps ensure that all identified issues are thoroughly addressed and well-documented. In cases where resolution is not immediately possible, we have established a formal escalation process to address and resolve concerns promptly and effectively.

These enhancements collectively elevate the robustness of our safety protocols, ensuring a safer environment for all faculty, staff, and students

EHS has proactively embraced the responsibility of enhancing safety in the theatre and across various student-led groups, including the Rocket Club, Theatre Club, Baja Club, and others. Our aim is to ensure these groups not only have a direct line of communication with our department but also a significant voice in shaping the safety protocols that affect their activities. To support these efforts, we have developed a comprehensive theatre safety program. This program implemented in 2023-2024 continues to grow. This strategic move demonstrates our commitment to providing a safe, engaging, and supportive environment for all student activities

Biosafety

FY2024-25 Biosafety

The Biosafety Program at Case Western Reserve University is dedicated to ensuring the safety of its community by adhering to rigorous standards and regulations. Over the years, the program has undergone significant developments, including the appointment of a new Biosafety Officer, comprehensive reviews of training programs and manuals, and enhanced collaborations with various departments and agencies. Key initiatives have included joint inspections with regulatory bodies, the strengthening of Occupational Health Monitoring programs, and meticulous management of biological agents and hazardous materials. Moving forward, the program aims to further enhance its capabilities, including the expansion of specialized inspection programs and ongoing efforts to improve safety protocols across the university.

EHS Biosafety Program 2024-2025

The University Biosafety Officer position was filled in October 2022, bringing stability and leadership to the program. Throughout 2021-2022, the program continued operations, primarily supporting IACUC and IBC activities. A comprehensive review of the Biosafety training program was conducted, resulting in the issuance of an updated and improved training curriculum.

EHS Biosafety Program 2024-2025

2024-2025 was a pivotal growth period for the Biosafety Program with many advancements and reenergized functionality. During this period extensive planning occurred between Research Administration and EHS to find opportunities to enhance both programs through cooperative inspection., post approval monitoring, increase committee presence, and joint training opportunities. EHS and research administration IBC and IACUC offices have forged a strong bond. The efforts found fruit on 2024-2025 and continue to grow.

Collaborative efforts persist with a deep integration across both BSL3 and ABSL3 facilities. These facilities had not undergone inspections by USDA and CDC in support of several issued permits since prior to the COVID-19 period. Extensive testing of both facilities was

conducted in preparation for the inspections and to support annual operational maintenance, revealing several discrepancies that have since been successfully resolved. Through coordinated teamwork involving the BSL3/ABSL3, the School of Medicine, Facilities, Research Administration, and EHS, significantly enhanced protocols and operational maintenance procedures were developed. As a result of these collective efforts, the joint USDA/CDC inspections proceeded seamlessly without any incidents.

Collaborative efforts persist with University Health Services to fortify and enhance a robust Occupational Health Monitoring program. This comprehensive program encompasses evaluations for various occupational hazards, including but not limited to animal dander, biohazards such as TB, chemical agents as utilized in IACUC and IBC protocols, respiratory protection, and other research-related exposures. Tailored consultations on safe work procedures are provided, along with active monitoring of workers to ensure their well-being and safety.

The Biosafety Program meticulously maintains an active inventory of biological agents on campus, recording and managing this information through the OSHA Exposure Control Plans. These plans undergo regular evaluations and are updated annually with input from laboratories. Collaborative partnerships between laboratories and the Biosafety Officer are a routine occurrence, facilitating protocol reviews and post-approval monitoring to ensure adherence to safety standards.

The Biosafety Program consistently conducts collaborative inspections alongside the IACUC, IBC, BSL3, ABSL3, and the Animal Resource Center to ensure that facilities adhere to stringent containment standards, comply with protocols and OSHA Exposure Control Plans, and have appropriate emergency procedures and signage in place. These thorough inspections are carried out at least annually to maintain a high level of safety and compliance. Additionally, the BSL/ABSL3 facilities undergo annual testing for failure modes, with identified issues promptly addressed and repaired. Such rigorous maintenance is mandated by regulatory bodies including the CDC, USDA, APHIS, AAALAC, and other permitting agencies.

Specialized inspections with targeted areas of emphasis are routinely carried out. For instance, a comprehensive inspection of the Prion center was conducted, encompassing all Prion research activities, with a detailed report outlining identified deficiencies. One significant area flagged for improvement was the lack of adequate area access control, particularly regarding access from public areas to research zones, which was deemed less stringent than optimal. This concern was promptly communicated to the School of Medicine for integration into their planning initiatives. A completely new facility unifying the pathogen department is underway with completion in 2026-2027.

Case Western Reserve University's Infectious Waste Program operates in full compliance with DOT and state regulations, overseeing the comprehensive lifecycle of infectious waste from collection to treatment and final disposal. Our expert teams, equipped with specialized training in infectious waste management and strict adherence to OSHA bloodborne pathogens standards, meticulously supervise all aspects of the collection and disposal processes.

In collaboration with Daniels Health, a trusted partner in waste management, the university ensures the safe transportation and environmentally responsible disposal of infectious waste. Regular inspections of designated Infectious Waste Areas are conducted, alongside meticulous maintenance of the Facility Management Plan, which includes detailed provisions for regulatory compliance and emergency preparedness. These practices underscore the program's commitment to maintaining the highest standards of safety and environmental responsibility.

FY2025-2026-Program Objectives – Looking forward, the program has set goals for 2025/26, which include further developing the Prion-specific laboratory inspection program as well as developing an inspection program for labs that require an IBC protocol. Expansion of these efforts to other areas will continue in subsequent years. The Biosafety manual will undergo thorough review to ensure alignment with current best practices and regulations.

Chemical Safety

Chemical Safety at Case Western Reserve University is organized into several subprograms, each addressing specific facets of safety within our chemical environment. These subprograms include hazardous waste management, respiratory protection, training, emergency response, and hazard communication. Together, they form a comprehensive framework for ensuring the safe handling and use of chemicals on campus.

Within this framework, critical elements such as indoor air quality, OSHA exposure monitoring, chemical inventory management, inspections, and specialized consultations on research devices and installations are managed by the Chemical Safety Program. These elements are essential for maintaining a safe and compliant environment for all members of the university community.

In addition to these efforts, collaborative initiatives with the research community are a cornerstone of our approach to chemical safety. By working closely with researchers across all disciplines, Environmental Health and Safety (EHS) ensures that safety practices are integrated seamlessly into research activities. This collaborative approach reflects our commitment to fostering a culture of safety and regulatory adherence throughout the university.

Furthermore, the Chemical Safety Program includes the University Laboratory Safety Committee, established in 1989. Comprising faculty, staff, and administrators from diverse backgrounds, this committee plays a crucial role in overseeing safety practices in laboratory settings. Among its responsibilities is the review and approval of the Laboratory Safety Manual, which sets forth fundamental safety protocols campus-wide. Additionally, the committee addresses specialty issues, such as injuries and incidents, and implements mitigation strategies as needed. Through its collaborative efforts, the University Laboratory Safety Committee serves as a key driver in promoting a culture of safety and ensuring compliance with safety standards across the university.

Laboratory Safety Inspections

Laboratory safety at Case Western Reserve University is paramount, with a meticulous inspection and compliance process in place to ensure a safe working environment. Each laboratory, whether on or off-campus, undergoes comprehensive inspections covering a range of safety aspects, from fire and electrical systems to hazardous materials handling and personal protective equipment. These inspections are conducted regularly to monitor progress and address any recurring issues effectively. Through collaborative efforts between Principal Investigators (PIs) and Environmental Health and Safety (EHS), findings are documented, communicated, and resolved promptly. Summary reports are then distributed to department Chairpersons, ensuring awareness of safety measures and necessary upgrades. This systematic approach underscores the university's commitment to fostering a culture of safety and continuous improvement within its research facilities.

Frequency and Scope of Inspections: Each laboratory, both on and off-campus, undergoes at least one comprehensive inspection to ensure compliance with safety standards and regulations. Inspections cover various aspects, including fire safety, electrical systems, mechanical equipment, hazardous materials storage and handling, personal protective equipment (PPE), training, and other relevant topics.

Comparison and Progress Monitoring: Results from each inspection are compared to previous years to track progress and ensure that recurring issues are addressed effectively. Emphasis is placed on continuous improvement and correction of identified deficiencies.

Communication and Documentation: Following inspections, a detailed communication is prepared between the Principal Investigator (PI) and Environmental Health and Safety (EHS) to outline findings. Findings are documented with photographs to facilitate precise identification of issues.

Collaborative Resolution and Updates: EHS collaborates with PIs to implement necessary changes and updates, including revisions to manuals, training materials, signage, emergency contacts, and other relevant aspects. Safety devices provided by the facility, such as fume hoods, eyewashes, safety showers, cold rooms, warm rooms, and fire protection systems, are identified, cataloged, and inspected for operational certification.

Summary Reports and Communication: Summary documents are prepared and disseminated to each Chairperson to ensure awareness of findings, corrections, and required upgrades within their respective areas. Safety plans, inventory, and emergency contact information are collected and updated as part of the inspection process.

Training

Environmental Health and Safety (EHS) provides over 12,000 contact hours of individual training annually, addressing a wide array of regulatory compliance topics. From driver's education to laboratory safety, as well as radiation, chemical, and biological safety, our training programs cater to the diverse needs of the university community. Additionally, we offer Continuing Education Units (CEUs) upon request, enabling professional development opportunities.

Our training programs begin with engaging, interactive in-person sessions led by experienced trainers, complemented by annual self-directed learning modules. By utilizing state-of-the-art presentation techniques, we make our sessions not only engaging and entertaining but also focused on educational objectives and regulatory compliance.

Harnessing cutting-edge Artificial Intelligence (AI) technology, EHS produces high-quality, in-house training materials. This approach ensures swift adaptation to changing requirements and timely content delivery. We also collaborate with other departments to create tailored training solutions that meet specific needs.

EHS's comprehensive training extends beyond the university campus to serve high schools, external companies involved in cooperative grants, traditional students, faculty, and volunteers.

In collaboration with Research Administration, EHS is centralizing training records and streamlining programs through a unified platform. This joint initiative, anticipated to launch during the 2025-2026 period, aims to improve accessibility and efficiency for training management across the university. Significant implementation delays have occurred requiring EHS to remain on the existing Canvas system.

We partner with organizations like Metro Health, Cleveland Clinic, Veterans Affairs, and NASA to support training for shared resource projects. Through these cooperative efforts, we strive to create a comprehensive, collaborative, and compliant training environment.

We collaborate with partner organizations, including Metro Health, Cleveland Clinic, Veterans Affairs, and NASA, to provide training support for shared resource partner projects. These collaborative endeavors are aimed at creating a comprehensive, cooperative, and compliant training environment. By leveraging the expertise and resources of these esteemed organizations, we strive to enhance the quality and effectiveness of our training programs, ensuring participants receive the highest standard of education and preparation.

Throughout 2024-2025, EHS has streamlined its training classes by consolidating courses with similar content. As a result, composite course offerings have been developed and are now accessible to students in the fields of Medicine, Dentistry, and Nursing. This initiative has reduced the required training hours from 9 to 3 while maintaining or even improving content quality. By using tools like Zoom, we've moved from traditional classroom settings to virtual platforms, allowing us to reach larger audiences and conduct more efficient training sessions.

EHS partnered with the Dental School to implement an innovative solution by replacing the previous Infection Control module with an online course generated using Artificial Intelligence (AI). This strategic initiative has allowed the Dental School to fulfill a missing requirement efficiently and effectively. By leveraging AI technology, we have optimized the delivery of essential training while enhancing the educational offerings within the dental curriculum.

In conclusion, Environmental Health and Safety (EHS) remains committed to providing comprehensive and effective training programs to meet the diverse needs of the university community and beyond. From regulatory compliance to professional development, our initiatives cover a wide range of topics, delivered through innovative methods like interactive virtual sessions and AI-generated online courses. By partnering with other organizations and using optimization tools, we aim to improve accessibility and efficiency in training across disciplines and platforms. Our dedication to continuous improvement and collaboration ensures that we maintain a leading role in fostering a culture of safety and excellence in education.

FY2025-2026 Program Objectives: EHS remains unwavering in its commitment to refining training classes and seeking opportunities to streamline content delivery through synergistic approaches. By consolidating training materials, we aim to offer significant time savings for trainees. Leveraging advanced AI technologies, EHS will refine current programs and enhance our delivery capabilities. Our collaborative efforts with Research Administration will continue as we transition training from Canvas to the Docebo platform, ensuring seamless migration and elevating the learning experience. Through these strategic initiatives, EHS is poised to deliver unparalleled educational value while driving innovation in safety and compliance training

Indoor Air Quality (IAQ) and Occupational Health Monitoring

Maintaining optimal Indoor Air Quality (IAQ) and robust occupational health monitoring is essential for fostering a safe and productive working environment. IAQ monitoring involves assessing and controlling pollutants that can affect the health, comfort, and well-being of building occupants. This includes monitoring levels of carbon dioxide, volatile organic compounds (VOCs), particulate matter, and other airborne contaminants.

Occupational health monitoring encompasses proactive surveillance strategies to identify potential workplace hazards and protect employees from harmful exposures. This includes periodic assessments of noise levels, chemical exposure, ergonomic risks, and biological agents.

Services Provided:

1. Exposure Assessment:

CWRU EHS conducts exposure assessments for environmental hazards in workplaces, including mold, asbestos, mercury, and other contaminants in laboratories and construction or renovation spaces.

2. Safety Compliance:

By reviewing safety plans and questionnaires, CWRU EHS identifies laboratories using materials like anesthetic gases, regulated chemicals (e.g., the upcoming methylene chloride ban), pathogenic biological materials, and radiological materials. It assesses these uses to ensure compliance with regulatory exposure levels.

3. **Formaldehyde Monitoring:**

In areas like anatomy, where formaldehyde is used, thorough testing is conducted to maintain long-term exposure stability and confidence. Paired with comprehensive training and regular spot checks, these measures ensure the HVAC systems remain consistent with negative exposure assessments. Substituting formaldehyde and phenol has partially mitigated exposure risks.

4. **IAQ Complaints:**

CWRU's program promptly responds to Indoor Air Quality (IAQ) complaints, identifying root causes and providing solutions. Additionally, work involving particularly hazardous or chronic exposure materials is carefully assessed and mitigated to ensure a safe working environment.

FY2025-2026 Program Objectives: The ban on methylene chloride will require the creation of a new monitoring program. This program was delayed by EPA till 2026.

Waste

The management of hazardous waste is a critical component of maintaining a safe and compliant research environment. We adhere to stringent regulations to ensure the proper identification, handling, storage, and disposal of hazardous materials. Our Environmental Health and Safety (EHS) team works closely with laboratory personnel, researchers, and staff to minimize the risks associated with hazardous waste, providing guidance, training, and comprehensive services.

Effective hazardous waste management begins in the laboratories with responsible inventory management and purchasing practices. Every laboratory is required to maintain a comprehensive inventory of the chemicals used in each space. Starting in the 2023-2024 academic year, EHS has requested that these inventories be submitted in electronic format. This digital transition will streamline the creation of disposal cost assessments for department chairs and school administrators, helping them better understand the expenses related to laboratory closures due to departure or retirement, and plan accordingly.

EHS provides ongoing support in managing the clearance and departure process for laboratories, ensuring the proper removal of chemicals and other materials. From 2022 onward, EHS adopted a collaborative approach to hazardous waste removal. Previously, contractors removed materials without preprocessing. However, we recognized that

Careful sorting of containers and the direct disposal of non-hazardous materials could lead to significant cost savings.

Since disposal costs are directly billed to the schools, these efforts represent a crucial stewardship initiative. Savings range from 20% to 60% of the raw disposal cost, and additional reductions can be achieved by redistributing materials to other laboratories where applicable. This proactive approach is only possible when schools provide the labor required for sorting and consolidating. Given that a single cleanup can cost up to \$60,000, even a modest 20% savings translates to \$12,000—a substantial and worthwhile reduction.

FY2025-2026 Program Objectives: A price increase has not been issued since 2016. We expect an increase of 30-50% in 2025-2026. We were able to keep this price increase down in 2024-2025 but expect the costs will rise in 2026-2027.

Emergency Response Signs

FY2024-2025 Program Objectives: Maintaining clear and accurate emergency response signs on laboratory doors is crucial for a swift and effective response to potential incidents. These signs convey essential information to emergency personnel, including the presence of hazardous materials, specific risks associated with the lab, and immediate contact details for responsible personnel. An up-to-date and accurate database of contact information ensures that the right individuals can be quickly reached in case of an emergency.

CWRU EHS is investigating the use of QR codes into these signs to streamline the sharing of accurate data and prevent outdated information from lingering. By scanning the QR code, responders can access a secure and current digital repository of lab-specific data, including emergency contacts, hazards present, and safety protocols. This innovation eliminates the risk of stale or incomplete information and provides real-time updates that enhance safety. Collection of data will occur during the annual collection of safety plans. EHS will share this database with Police and Security to assure everyone has direct access to the data.

Clearance

Before any laboratory equipment is disposed of or relocated, it must be thoroughly inspected for potential hazards. This clearance process ensures that equipment is free of contaminants such as chemical, biological, or radiological residues that could pose risks to individuals handling it or to the environment.

FY2025-2026 Program Objectives: To streamline this process, an improved online form has been developed. It automatically logs service requests and generates the necessary paperwork. This streamlined system will be fully implemented in the coming year. The personnel performing this task was budget reduced in 2024-2025.

Respirator Program

The OSHA Respirator Program is pivotal in ensuring workplace safety through proper respiratory protection protocols. Workers undergo a rigorous process beginning with a medical evaluation to assess their suitability for respirator use. Subsequently, fit testing is conducted to verify that the selected respirator forms a secure seal on the wearer's face. Thorough training is provided to equip employees with the knowledge of respirator usage, maintenance, storage, and hazard recognition.

Selection of the appropriate respirator type is tailored to the specific workplace hazards, ensuring optimal protection. Regular assessments are carried out to uphold program effectiveness and compliance with OSHA standards, thereby guaranteeing the proper maintenance and utilization of respiratory protection for safeguarding worker health and safety.

Despite the decrease in program users post-COVID, the enduring impact of the pandemic, particularly in clinical settings, emphasizes the continued necessity of the respirator program. During the pandemic, essential adaptations were made to streamline the medical evaluation, training, and fit-testing processes, which have persisted beyond the crisis.

Furthermore, collaboration between EHS and students from Medical, Dental, and Nursing groups has been extensive, ensuring their comprehensive preparedness for clinical rotations and reinforcing the importance of respiratory protection in healthcare environments.

Facilities/Fire/Construction/Mechanical/ Theatre Safety Programs

Facilities Safety Group

The Facilities Safety Group at Case Western Reserve University has made significant progress throughout Fiscal Year 2025 in its mission to ensure a safe, healthy, and compliant campus environment.

Comprising the safety of the Construction Program, Environmental Program, Theatre Safety Program, Student Program, Facilities Program and Fire and Life Safety Program, the group delivered broad-based safety initiatives, strengthened regulatory compliance, and advanced several key projects that reflect the university's commitment to protecting its people, facilities, and resources.

Throughout the year, the Environmental Program played a crucial role in identifying, managing, and mitigating various environmental risks across campus. One of the program's most notable accomplishments was the environmental abatement and subsequent demolition of the Yost Building, a major undertaking that required careful coordination of contractors, environmental consultants, and third-party monitoring. Beyond this high-profile project, the program continued its development of full building asbestos surveys, an initiative designed to create a more comprehensive and proactive approach to asbestos management campus-wide.

In addition to asbestos oversight, the Environmental Program provided critical support in addressing air and water quality concerns. The team responded to reports from students, faculty, and staff regarding indoor air quality, arranging for testing and working closely with environmental consultants to ensure any potential issues were addressed promptly. Annual water quality testing was also coordinated and completed, reaffirming the university's commitment to maintaining safe and healthy living and working environments.

The group's efforts extended to hazardous and universal waste management, where it aided in the proper handling and disposal of various materials, including light bulbs, batteries, and electronic waste.

A particularly impactful achievement this year was the removal and safe disposal of lithium-ion batteries from two energy storage systems on campus. This project not only addressed a potential safety hazard but also supported broader sustainability goals.

Furthermore, the Environmental Program offered assistance in construction safety and legal due diligence, coordinating environmental site assessments in partnership with the university's General Counsel during land purchase evaluations.

The Facilities Safety Program conducted comprehensive reviews and audits across multiple safety areas.

As a result, 41 noncompliance issues were identified across nine separate programs. Through targeted interventions and corrective actions, 27 of those issues were successfully mitigated or fully eliminated, reflecting a proactive approach to risk reduction and regulatory compliance.

In support of ongoing safety education and awareness, the program also delivered training to 543 individuals. These training sessions helped reinforce best practices, equip staff with necessary safety skills, and ensure that all personnel are prepared to work in accordance with institutional and legal safety expectations. Overall, the Facilities Safety Program continues to advance a culture of safety at CWRU by prioritizing compliance, reducing workplace risks, and investing in the professional development of its staff. We have seen great strides in this facet of the group's programs.

The Theatre Safety Program demonstrated strong leadership in managing the unique safety challenges associated with performance spaces, student productions, and workshop environments. A major milestone this year was the creation of the Performing Arts, Venue and Shop Safety Manual, which consolidated safety procedures and best practices for theatre operations into a single reference guide.

The program also enhanced campus-wide safety protocols by updating training materials related to powered industrial trucks, crane operation, and student worker safety. The manual was received with much appreciation from Joy Ward.

Theatre venues across campus were subject to regular inspections, ensuring that all rigging systems, stage equipment, and scenery areas were safe for performers, staff, and patrons. The safety group worked closely with student theatre organizations to provide ongoing advice, enforce compliance with policy, and ensure safe operation of equipment and tools. Additionally, technical evaluations were performed to assess the safe use of atmospheric effects such as fog and haze, allowing for artistic expression without compromising health or fire safety.

The Fire and Life Safety Program continued its work on maintaining compliance with fire codes, improving emergency preparedness, and ensuring the operability of fire protection systems across the university. A comprehensive schedule of building inspections was carried out, covering all academic buildings, dormitories, and Greek Life houses multiple times throughout the year. The program exercised and inspected key fire system components such as post indicator valves, sprinkler risers, and control valves, and maintained detailed records of maintenance schedules and system lifespans.

In support of community preparedness, the program provided fire safety training and conducted hands on fire extinguisher training sessions for students and employees across campus. Fire drills were conducted in all residential facilities and select academic buildings, ensuring that both students and staff were familiar with emergency evacuation procedures. Additionally, the Fire

and Life Safety Specialist remained actively involved in Cleary Act reporting, special event planning, and hot work permitting, all of which require meticulous coordination and compliance monitoring.

Looking ahead to Fiscal Year 2026, the Facility Safety group has identified a clear set of goals aimed at building on the progress achieved this past year. These include furthering the asbestos survey initiative, beginning environmental abatement work on the Morley Building, and introducing cost-saving strategies for the disposal of universal waste. In the theatre safety program, priorities include refining safety documentation, establishing a formal shop inspection process, and enhancing training around venue specific systems. The Fire and Life Safety Program is planning to increase inspections of residential housing, expand extinguisher training opportunities, and take a more active role in witnessing fire protection system tests.

The Facilities Safety Program has taken on a massive goal of embedding much of our safety standard operating procedures in our facilities management system, asset essentials.

Overall, the CWRU Facilities Safety Group demonstrated a strong, coordinated effort in 2025 to enhance safety standards, promote regulatory compliance, and reduce risk across all areas of university operations. Through collaborative work and consistent engagement with the campus community, the group continues to build a culture of safety that supports the university's academic mission and protects its people and infrastructure.

DATA

EHS METRIC 2024-2025										
COMMITTEE AUDITS	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Total					
Radiation Safety Committee Audits	10	10	10	10	40					Porter
Laboratory Safety Committee Audits	0	0	0	0	0					
IACUC Audits - New Protocols	30	34	39	27	130					Scott
IACUC Audits - Continuing reviews					0					
IACUC Audits - Addenda	6	1	6	4	17					Young
IBC Audits	25	16	19	26	86					Bhagya
CHP/ECP SUBMITTED	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Total					
CHP	103	81	60	17	261					Cash
ECP	94	75	53	25	247					
TOTAL	197	156	113	42	508					Kirk
										Rubin
ORIENTATION	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Total					
New Employees	96	108	33	35	272					Merk
New Faculty	60	75	27	17	179					
Total	156	183	60	52	451					
ANESTHETIC GASES/VAPORS	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Total					
Isolfurane	0	0	0	0	0					
TRAINING	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Total	Canvas	In-Person	TOTAL		
Laboratory Safety/Regulated Chemicals	793	755	887	848	3283	2077	1206	3283		
Police and Security Composite (Hazcom, Biohaz/BBP, Ancillary Rad)	5	8	12	9	34	34		34		
Custodial Composite (Hazcom, Biohaz/BBP, Ancillary Rad)	153			3	156		156	156		
Plant and Maintenance Composite (Hazcom, Biohaz/BBP, Ancillary Rad) (Kirk)	2	3	4	74	83	83		83		
Health Education Campus Composite (Hazcom, Biohaz/BBP, Ancillary Rad)	622	645	243	689	2199	1129	1070	2199		
Hazard Communication (General w/ancillary radiation)	149	231	156	137	673	347	326	673		
ARC Safety Training	71	0	148	0	219	120	99	219		
Formaldehyde	78	42	142	120	382	382	0	382		
Biohazard Training with Bloodborne Pathogens	585	694	585	871	2735	1672	1063	2735		
Respirator (Academic and Plant)	33	68	142	56	299	299	0	299		
Vehicle Safety	90	45	69	24	237	0	237	237		
Fire Extinguisher/Fire Safety	0	65	20	68	153	0	153	153		
Plant (Hearing Conservation, etc.) (Hazcom/Bio/Rad added in Hazard Communication)	85	144	136	72	437	0	437	437		
BSL 3					0		0	0		
DOT/IATA Shipping	57	40	60	50	207	0	207	207		
Contractor	4	6	9	3	22	0	22	22		
Special Classes	0	57	10	13	80		80	80		
Scissor Lift	7	3	0	0	10		10	10		
Fork Lift	40	0	0	24	64		64	64		
Rigging Training	3	3	3	0	9		9	9		

Other	122	57	90	86	355		355	355		
TOTAL	2908	2866	2716	3147	11637	6143	5494	#####	(SHOULD EQUAL CELL F48)	
LABORATORY INSPECTIONS										
Building Name					Total					
	July-September	October-December	January-March	April-June						
Art Studio					0					
A.W. Smith	1	89			90					
Bingham	5	8			13					
Bishop				6	6					
Bolwell				3	3					
Biomedical Research Bldg.			120	96	216					
CCMSB	32									
Cleveland Clinic Foundation					0					
Clapp		5			5					
Coroner's Office (UCRC II)					0					
DeGrace (Biology)		40			40					
Dental HEC				275	275					
Dental Research				44	44					
Farm					0					
Glennan	4	49			53					
HEC			18							
Incubator (Bioenterprise, UCRC I, University West)			2		2					
Kent Hale Smith		70			70					
Lerner UH				1	1					
Lowman					0					
MacDonald				7	7					
MetroHealth		81			81					
Millis		120			120					
Mixon										
NASA					0					
Nursing HEC					0					
Nursing Research				6	6					
Olin		49			49					
Pathology				25	25					
RAD Waste Facility					0					
RB&C					0					
Research Tower			47	44	91					
Rohrlich (MFD East)				189	189					
Rockefeller		8			8					
Sears Building					0					
Sears Tower		7			7					
Service Bldg.					0					
Simulation Center (Mt. Sinai)					0					
Strosacker					0					
VA Hospital				10	10					
Walker					0					
Wearn			20	2	22					

[illegible]

FUME VELOCITY HOOD TESTING	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Total						
Pass	81	122	132	223	558						
Restricted	25	22	9	10	66						
Failed	25	10	25	24	84						
Work Orders	93	91	111	91							
Retests	5	63	43	16		708					
TOTAL	229	308	320	364	1221						
CLEARANCES	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Total						
Relocation	8	15	37	7	67						
Repairs	2	3	1		6						
Disposal	75	34	107	22	238						
Demolition	1				1						
Equipment Fabrication (OLIN)	2	2		1	5						
Renovation					0						
Relocation to Storage	4				4						
Termination					0						
Clean	5	6			11						
Return to Vendor				1	1						
Cold Room Repairs				1	1						
Decommission or Sale					0	334					
TOTAL	97	60	145	32	334						
ERGONOMICS	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Total						
Ergonomics Assessment	3	0	3	3	9						
Follow-ups	3	0	2	2	7						
CHEMICAL PURCHASE APPROVALS											
Purchase Approvals	49	82	67		198						
HAZARDS MATERIALS SHIPPING											
DOT/IATA SHIPPING	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Total						
Aviation Regulated Liquid (Formalin)	14	13	17	10	54						
Biological Category B	11	9	17	10	47						
Corrosive	11	9	17	10	47						
DOT/IATA	11	9	17	10	47						
Dry Ice	14	13	18	20	65						
Exempt	14	13	18	20	65						
Infectious	11	9	17	10	47	372					
TOTAL	86	75	121	90	372						
TYPES OF INJURIES											
INJURY TYPES	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Total						
Needlestick	4	1	1	2	8						
Splash	1	2	0	0	3						
Burn	0	1	1	2	4						
Concussion/Contusion	7	3	3	4	17						

Laceration	4	3	8	9	24					
Strain/Sprain	5	4	3	4	16					
Slip/Fall	8	2	7	10	27					
Inhalation/Exposure	1	2	3	6	12					
Bite/Sting	2	0	0	0	2	113				
TOTAL	32	18	26	37	113					
INCIDENTS	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Total					
Alarms	4	1	5	3	13					
Egress					0					
Equipment Alarm					0					
Explosion/Fire					0					
Exposure (Chemical/Biohazard)					0					
Flood			2		2					
Food in Lab					0					
Gas Alarm, Leak					0					
Hood Repair					0					
IAQ			1		1					
Injury (SHARPS)			1		1					
Leak (Water)			1	1	2					
Mercury					0					
Noise					0					
Odor	4	5	14	9	32					
Other (Housekeeping)					0					
SHARPS waste					0					
Spills/Leaks (Chemical/Biohazard)	4	3	4	6	17					
Suspicious Substance	2				2					
Temperature					0					
Unauthorized Entry					0					
Unsafe Conditions			2		2					
Ventilation					0					
Waste Issue		1			1					
TOTAL	14	10	30	19	73	73				
REPORTED FIRES	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Total					
Residence Halls	1	2	0	0	3					
Non-Residence Halls	1	0	0	2	3					
TOTALS	2	2	0	2	6					
FIRE SAFETY REPORTS	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Total					
Fire Alarms	75	82	75	79	311					
Hot Work Permits	198	56	161	162	577					
Red Tag	4	0	2	10	16					
Fire Drills	58	59	109	71	297					
Fire Inspection, Complete Bldg.	160	161	191	164	676	1877				
TOTAL	495	358	538	486	1877					

ENVIRONMENTAL ISSUES	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Total					
Asbestos Surveys	10	8	15	4	37					
Asbestos Abatements	19	16	17	16	68					
Asbestos Training	0	0	0	0	0					
Mold (Microbial) Issues	5	3	4	8	20					
Microbial Clean up	3	7	4	2	16					
Lead Testing	3	1	2	0	6					
Water Testing	0	3	3	0	6					
IAQ	4	0	11	6	21					
Phase I	0	0	1	0	1					
Universal Waste	0	1	3	3	7					
Misc.	0	0	4	2	6	188				
TOTAL	44	39	64	41	188					
OTHER MONITORING	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Total					
Formaldehyde Monitoring	0	1	1	5 DCM	2					
Confined Space (Shutdowns)	7	8	10	9	34					
TOTAL	7	9	11	9	36					
ENTRANCE CAUTION SIGNS	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Total					
Sig/15	141	219	86	70	360					

EHS METRIC 2023-2024					
COMMITTEE AUDITS	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Total
Radiation Safety Committee Audits	10	10	10	19	49
Laboratory Safety Committee Audits	0	0	0	0	0
IACUC Audits - New Protocols	42	35	26	40	143
IACUC Audits - Continuing reviews					0
IACUC Audits - Addenda	7	6	7	3	23
IBC Audits	22	17	13	25	77
CHP/ECP SUBMITTED	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Total
CHIP	1	154	54	43	252
ECP	40	87	74	23	224
TOTAL	41	241	128	66	476
ORIENTATION	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Total
New Employees	155	147	142	181	625
New Faculty	200	150	176	171	697
Total	355	297	318	352	1322
ANESTHETIC GASES/VAPORS	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Total
Isoflurane	0	5	0	0	0
TRAINING	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Total
Laboratory Safety/Regulated Chemicals	777	657	921	881	3236
Police and Security Composite (Hazcom, Biohaz/	1	3	12	7	23
Custodial Composite (Hazcom, Biohaz/BBP, Anci	136	0	0	0	136
Plant and Maintenance Composite (Hazcom, Bio	78	1	76	1	156
Health Education Campus Composite (Hazcom, E	631	126	240		997
Hazard Communication	196	159	285	264	904
ARC Safety Training		38			38
Formaldehyde	23	35	38	49	145
Biohazard Training with Bloodborne Pathogens	540	539	779	755	2613
Respirator (Academic and Plant)			187		187
Vehicle Safety	40	50	68	31	189
Fire Safety Only	0	0	0	0	0
Fire Extinguisher/Fire Safety	51	8	7	0	66
Plant (Hearing Conservation, etc.) (Hazcom/Bio/	84	340	268	106	798
BSL 3					0
DOT/ATA Shipping	40	60	10	41	151
Contractor	16	5	11	4	36
Special Classes	3	2	4	2	11
Scissor Lift	0	0	0	0	0
Fork Lift	11	0	0	13	24
TOTAL	2627	2023	2906	2154	9710

ROOM INSPECTIONS (Inspections run from January to December)					
Building Name	July-September	October-December	January-March	April-June	Total
Art Studio					0
A.W. Smith	11	118			129
Bingham	0	87			87
Bioenterprise (UCRC I, University West)					0
Bishop				5	5
Bolwell				5	5
Biomedical Research Bldg.			8	465	473
CCMSB	0	29			
Cleveland Clinic Foundation					0
Clapp	18				18
Coroner's Office (UCRC II)					0
DeGrace (Biology)	14	15			29
Dental HEC	509				509
Dental Research	4			178	182
Farm					0
Glennan		20			20
Kent Hale Smith	0	154			154
Lerner UH					0
Lowman					0
MacDonald				14	14
MetroHealth					0
Millis	73	61			134
Mixon			144		
NASA					0
Nursing HEC					0
Nursing Old	61		7	206	274
Olin		51			51
Pathology	38		36	118	192
RAD Waste Facility					0
RB&C					0
Research Tower				98	98
Robbins (MED East)			145	274	419
Rockefeller	0	107			107
Sears Building	0	6			6
Sears Tower				2	2
Service Bldg.					0
Simulation Center (Mt. Sinai)					0
Strosacker	8				8
VA Hospital				18	18
Walker					0
Wearn				41	41
West Quad (Mt. Sinai) (CCMSB)					0
White	7	74			81
Wickenden	107	27		5	139
Wolstein Research Bldg.	71		50	333	454
Wood				311	311
TOTAL	921	749	390	2073	3960

CRANE INSPECTIONS	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Total
AW Smith	0	0	0	1	1
Bingham	0	0	0	6	6
BRB	0	0	0	1	1
Cedar Service Center	0	0	0	5	5
Maltz Performing Arts	0	0	0	1	1
Olin	0	0	0	1	1
Rockefeller	0	0	0	8	8
Sears Tower	0	0	0	3	3
White	0	0	0	3	3
Total	0	0	0	29	29
RESPIRATOR USE (From FileMaker)	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Total
Physical	47	90	166	33	336
Train	35	34	120	35	224
Fit Test	27	40	104	31	202
BIOHOOD REPORTS	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Total
Recertify	116	266	70	59	511
Repair (Service and Fail)	41	19	20	11	91
Total	157	285	90	70	255
ASHRAE TEST	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Total
Pass	no instrument	no instrument	no instrument	no instrument	0
Restricted					0
Fail					0
TOTAL	0	0	0	0	0
FUME VELOCITY HOOD TESTING	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Total
Pass	91	128	70	259	548
Restricted	24	12	2	17	55
Failed	27	19	7	14	67
Work Orders	22	82	36	122	262
Retests	19	29	25	22	95
TOTAL	183	270	140	434	1027
CLEARANCES	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Total
Relocation	23	19	45	69	156
Repairs	9	2	2		13
Disposal	61	153	30	71	315
Demolition					0
Equipment Fabrication (OJIN)				1	1
Renovation					0
Relocation to Storage					0
Termination					0
Clean	0	4	2	2	8
Return to Vendor				2	2
Cold Room Repairs	2	2		1	5
Decommission or Sale					0
TOTAL	95	180	79	146	500
ERGONOMICS	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Total
Ergonomics Assessment	2	0	4	2	8
Follow-ups	0	1	3	2	6

CHEMICAL PURCHASE APPROVALS					
Purchase Approvals	162	112	174	96	544
HAZARDS MATERIALS SHIPPING					
DOT/IATA SHIPPING	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Total
Aviation Regulated Liquid (Formalin)					0
Biological Category B					0
Corrosive					0
DOT/IATA	8	14	1	9	32
Dry Ice	12	16	4	14	46
Exempt	12	16	4	9	41
Infectious	8	14	1	9	32
TOTAL	40	60	10	41	151
TYPES OF INJURIES					
INJURY TYPES	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Total
Needlestick	2	5	2	0	9
Splash	1	1	0	1	3
Burn	1	1	1	1	4
Concussion/Contusion	3	10	0	2	15
Laceration	5	9	5	5	24
Strain/Sprain	2	7	6	3	18
Slip/Fall	7	28	13	5	53
Inhalation/Exposure	2	3	0	6	11
Bite/Sting	4	8	1	0	13
TOTAL	27	72	28	23	150
INCIDENTS					
Alarms					0
Egress					0
Equipment Alarm					0
Explosion/Fire		1			1
Exposure (Chemical/Biohazard)	1	2			3
Flood			1		1
Food in Lab					0
Gas Alarm, Leak					0
Hood Repair					0
IAQ					0
Injury (SHARPS)					0
Leak (Water)					0
Mercury					0
Noise	1		1	1	3
Odor	3	6	14	4	27
Other (Housekeeping)					0
SHARPS waste					0
Spills/Leaks (Chemical/Biohazard)		2	1	9	12
Suspicious Substance					0
Temperature	1		1		2
Unauthorized Entry			1		1
Unsafe Conditions		3			3
Ventilation			1	2	3
Waste Issue		1			1
TOTAL	6	15	20	16	57

REPORTED FIRES	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Total
Residence Halls	0	2	2	2	6
Non-Residence Halls	2	0	0	5	7
TOTALS	2	2	2	7	13
FIRE SAFETY REPORTS	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Total
Fire Alarms	68	92	61	56	277
Hot Work Permits	150	80	112	107	449
Red Tag	6	0	0	4	10
Fire Drills	56	54	57	53	220
Fire Inspection, Complete Bldg.	152	151	149	150	602
TOTAL	432	377	379	370	1558
ENVIRONMENTAL ISSUES	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Total
Asbestos Surveys	10	14	12	8	44
Asbestos Abatements	19	12	16	9	56
Asbestos Training	0	0	0	3	3
Mold (Microbial) Issues	5	8	4	8	25
Microbial Clean up	2	6	4	3	15
Lead Testing	3	2	2	3	10
Water Testing	10	7	9	0	26
IAQ	3	2	6	2	13
Phase I	1	1	1	0	3
Universal Waste					0
Misc.					0
TOTAL	53	52	54	36	195
OTHER MONITORING	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Total
Formaldehyde Monitoring	0	0	0	0	0
Confined Space (Shutdowns)	22	13	21	10	66
TOTAL	22	13	21	10	66
ENTRANCE CAUTION SIGNS	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Total
Signs	235	170	55	49	509

TRAINING METRIC 2024-2025

BIO SAFETY TRAINING(annual)	7/31/2024	8/31/2024	9/30/2024	10/30/2024	11/30/2024	12/30/2024	1/30/2025	2/28/2025	3/31/2025	4/30/2025	5/31/2025	6/30/2025	
	Total Delinquent (one year + older than one year)	564	462	379	392	322	350	360	480	300	334	581	581
	Initial Training-new	1241	1243	1260	1239	1232	1250	1254	1140	1103	1181	1161	1053
	Annual Retrained-completed	1404	1416	1482	1508	1570	1654	1580	1501	1522	1706	1722	1787
	Total Expected to Train(Delinquent Total + Initial + Retrained)	3209	3121	3121	3139	3124	3254	3194	3121	2925	3221	3464	3421
Percent Delinquent (Total Delinquent/Expected to Train)	17.58%	14.80%	12.14%	12.49%	10.31%	10.76%	11.27%	15.38%	10.26%	10.37%	16.77%	16.98%	
CHEM SAFETY TRAINING(annual)	7/31/2024	8/31/2024	9/30/2024	10/30/2024	11/30/2024	12/30/2024	1/30/2025	2/28/2025	3/31/2025	4/30/2025	5/31/2025	6/30/2025	
	Total Delinquent (one year + older than one year)	814	602	666	766	532	556	534	894	575	637	599	714
	Initial Training-new	1365	1373	1344	1312	1338	1348	1380	1268	1201	1276	1297	1185
	Annual Retrained-completed	1923	1911	2018	1899	1990	2076	2049	2051	1977	2111	2155	2184
	Total Expected to Train(Delinquent Total + Initial + Retrained)	4102	3886	4028	3977	3860	3980	3963	4213	3753	4024	4051	4083
Percent Delinquent (Total Delinquent/Expected to Train)	19.84%	15.49%	16.53%	19.26%	13.78%	13.97%	13.47%	21.22%	15.32%	15.83%	14.79%	17.49%	
RAD SAFETY TRAINING(annual)	7/31/2024	8/31/2024	9/30/2024	10/30/2024	11/30/2024	12/30/2024	1/30/2025	2/28/2025	3/31/2025	4/30/2025	5/31/2025	6/30/2025	
	Total Delinquent (one year + older than one year)	26	23	13	25	14	15	10	13	9	14	4	6
	Initial Training-new	70	77	71	68	70	72	64	62	60	64	64	60
	Annual Retrained-completed	220	290	208	198	202	202	190	203	194	196	199	200
	Total Expected to Train(Delinquent Total + Initial + Retrained)	316	390	292	291	286	289	264	278	263	274	267	266
Percent Delinquent (Total Delinquent/Expected to Train)	8.23%	5.90%	4.45%	8.59%	4.90%	5.19%	3.79%	4.68%	3.42%	5.11%	1.50%	2.28%	
HAZARD COMMUNICATION TRAINING (no required annual retrai	7/31/2024	8/31/2024	9/30/2024	10/30/2024	11/30/2024	12/30/2024	1/30/2025	2/28/2025	3/31/2025	4/30/2025	5/31/2025	6/30/2025	
	Total Delinquent (one year + older than one year)	48	44	40	46	50	56	59	66	64	85	585	676
	Initial Training-new	582	569	570	571	576	578	529	504	460	486	488	365
	Annual Retrained-completed	315	313	320	379	374	326	374	379	344	367	365	370
	Total Expected to Train(Delinquent Total + Initial + Retrained)	945	926	930	996	1000	960	962	949	868	938	1438	1411
Percent Delinquent (Total Delinquent/Expected to Train)	5.08%	4.75%	4.30%	4.62%	5.00%	5.83%	6.13%	6.95%	7.37%	9.06%	40.68%	47.91%	
Health Education Combined Training	7/10/2024	8/31/2024	9/30/2024	10/30/2024	11/30/2024	12/30/2024	1/30/2025	10/31/1900	3/31/2025	4/30/2025	5/31/2025	6/30/2025	
	Total Delinquent (one year + older than one year)	929	791	777	412	322	331	269	305	90	5	279	285
	Initial Training-new	508	552	559	739	736	730	723	711	659	692	719	842
	Annual Retrained-completed	835	852	870	1012	977	1055	1081	1059	962	1036	1040	1058
	Total Expected to Train(Delinquent Total + Initial + Retrained)	2272	2195	2206	2163	2035	2116	2073	2075	1711	1733	2038	2185
Percent Delinquent (Total Delinquent/Expected to Train)	40.89%	36.04%	35.22%	19.05%	15.82%	15.64%	12.98%	14.70%	5.26%	0.29%	13.69%	13.04%	