



Laboratory/Technical Area Safety Policy

Effective Date: January 25, 2016

Approval: January 25, 2016

Maintenance of Policy: Facilities and
Campus Operations, Department of
Environmental Health &
Safety/Risk Management

PURPOSE: The purpose of the University of Dayton (University) Laboratory/Technical Area Safety policy and accompanying Integrated Laboratory/Technical Area Safety Program is to provide a policy and procedures to work safely in University laboratories/technical areas. The University is committed to provide a safe and healthy working and learning environment for all faculty, students, employees, visitors, volunteers and contract employees and to maintain compliance to federal, state and local health and safety regulations.

SCOPE: This policy applies to all laboratories/technical areas and laboratory/technical area workers, researchers, faculty, students, visitors and volunteers working in laboratories, technical areas or other similar work spaces.

DEFINITIONS:

“Laboratory/Technical Area”: A laboratory/technical area is any location where hazardous materials or equipment may present a potential hazard are used or stored. It includes, but is not limited to research laboratories, teaching laboratories, QA/QC and analytical laboratories, chemical storage rooms, waste accumulation areas/locations, cold rooms, vivarium, engineering and machine rooms, art studios and theater areas.

“Supervisor”: For purposes of this policy, a supervisor is an employee who may have authority to hire personnel, evaluate performance, direct work assignments, apply progressive discipline, direct resources to correct identified safety issues. This would include a principal investigator, researcher, faculty and staff. Unless defined in writing, the default “supervisor” in laboratory/technical areas is the Principal Investigator.

“Integrated Laboratory/Technical Area Safety Program” (Program): Comprehensive written program to provide procedures for safety working in laboratory/technical areas.

REFERENCE DOCUMENTS:

1. Safety Training Policy
2. Working with Children and Minors Policy
3. Integrated Laboratory and Studio Safety Program
4. Environmental Health and Safety Policy

APPLICABLE REGULATIONS

1. APOSHA 29 CFR
1910.1450 Occupational
exposure to hazardous
chemicals in laboratories

POLICY HISTORY:

Approved in Original Form:

January 25, 2016

DEFINITIONS (continued):

“Training needs assessment”: An assessment of specific laboratory safety training needs will occur and be documented for all workers before the worker undertakes their work duties. The supervisor shall be responsible for accomplishing the needs assessment. See Safety Training Policy for list of potential training areas relative to current regulations.

“Worker” For purposes of this policy, a worker is an individual who actively performs work functions. A “worker” may be faculty, staff, volunteer, undergraduate/graduate student or visitor/visiting scholar working in the lab. For the purpose of this definition, “worker” excludes individuals who only passively participate in tours, lectures, conferences, etc. and enrolled undergraduate students in a teaching laboratory.

POLICY:

This policy defines work practices and procedures as well as roles, responsibilities and enforcement to non-compliance to ensure all laboratory workers, researchers, faculty, students, and visitors and volunteers working in laboratories, technical areas or other similar work spaces maintain a safe and healthy working and learning environment.

I. ROLES AND RESPONSIBILITY

Deans, Directors, Department Chairs, Heads of Academic and Research Units have the primary responsibility for the health and safety of their staff and students. Responsible for:

- Communicating, promoting and enforcing this policy in areas under their control.
- Collaborating with faculty and staff to implement the Program into the function of the laboratory/technical area.
- Making budget arrangements for health and safety requirements and improvements.

Supervisors/Principal Investigators are responsible for implementing the Program in their work areas. Those in charge are to promote a culture of safety as well as teach the requisite skills needed to work safely in the laboratory/technical area. Responsibilities include but are not limited to:

- Ensure a training assessment has been conducted and students and employees have completed the necessary training and retain training records and all related documentation.
- Implement and enforce the requirements of the Program for laboratories and/or studios under their supervision.
- Conduct hazard reviews of all laboratory procedures and equipment and have written operating procedures or protocols.
- Ensure that the door hazard signage is posted and kept current to communicate the hazards associated with the laboratory/technical area.
- Ensure and maintain compliance of the laboratories/technical areas, including students and employees work practices.
- Ensure the availability of and enforce the use of the following: appropriate personal protective equipment, chemical inventory, Safety Data Sheets (SDS's).
- Conduct internal inspections of the laboratory/technical area according to the Program guidelines.
- Dispose of waste in accordance with environmental regulations in coordination with EHS/RM.
- Request assistance from EHS/RM as needed i.e., reporting spills or incidents, conducting a hazard analysis, developing training, etc.

POLICY (continued):

Workers are responsible for working safely in the laboratory/technical area and will:

- Complete all required safety training.
- Read, understand and follow the Program and other related safety policies and procedures for the laboratory/technical area.
- Plan and conduct each laboratory/technical area operation in accordance the Program or standard operating procedures developed by the supervisor.
- Notify the supervisor of any hazardous conditions or unsafe work practices in the work area.
- Wear or use appropriate personal protective equipment as required or prescribed.
- Immediately report any injury or illness, including near misses, to the supervisor and fill out any necessary paperwork.

Environmental Health & Safety/Risk Management (EHS/RM) is responsible for providing interpretation and clarification regarding this Policy.

- Review and update the Program according to changes in safety regulations and best practices.
- Provide consultation and tools to assist supervisors in performing the safety training needs assessment and with developing training.
- Conduct safety inspections.
- Provide technical guidance and investigations for laboratory/technical area mishaps, accidents and injuries.
- Provide management oversight and assistance with environmental compliance, transport and disposal of hazardous waste.
- Have enforcement authority to ensure deficiencies are corrected in a timely manner in the laboratory/technical area.

II. ENFORCEMENT AND RESPONSE TO NON-COMPLIANCE

A program of periodic inspection helps keep laboratories/technical areas in safe operating condition. Inspections safeguard the quality of the University's safety program and embrace the following goals:

- Ensure that trained principal investigators, faculty, staff, researchers, students and visitors follow safety policies and procedures.
- Ensure that activities are conducted in a manner to avoid exposure to hazards.
- Maintain facilities and equipment in a safe, code-compliant operating condition.

Environmental Health & Safety/Risk Management provides oversight for the inspection and compliance program and has the authority to take corrective action to address non-compliance.

The compliance program requires laboratory/technical area supervisors and other responsible parties to take appropriate and effective correction action upon notice of a deficiency or non-compliance. Serious deficiencies are required to be corrected within 48-hours. Non-serious deficiencies must corrected within 30 days. Failure to take corrective actions within the required timeframe will result in a repeat deficiency finding and an escalation of the notification to the Department Chair, Dean and/or Vice President of Research or Provost. Depending on the severity of the deficiency, EHS/RM may temporarily suspend activities until the deficiency is corrected.

III. TRAINING

Effective training is critical to facilitate a safe and healthy work environment and prevent accidents. All principal investigators, faculty, staff, researchers, students, visitors and volunteers must participate in formal safety training and ensure that all their laboratory/technical area users have appropriate safety training before beginning their work. EHS/RM offers general classroom and online training, plus resource materials to assist with site-specific training.

This training must include:

- All laboratory/technical area personnel must complete general safety training before beginning work, prior to new exposure situations, and as work conditions change.
- Training must be completed annually.
- Information regarding job hazards, possible health effects and required work practices and procedures.
- Faculty are responsible for student safety training prior to any activity that has a potential for a safety concern i.e., lab, field trip, internship, field study, etc.
- Supervisors/principal investigators have the specific responsibility to ensure a training assessment and systems for communicating training requirements for employees and students in their jurisdiction.
- Supervisors of laboratories/technical areas are responsible for documenting health and safety training including safety meetings, one-on-one training, classroom and online training.

IV. MINORS AND VISITORS

Faculty, staff and researchers that have minors working in the laboratories/technical areas under their jurisdiction must review and understand the Minors Policy. The official University Policy can be found at <https://www.udayton.edu/policies/legalaffairs/children-on-campus-minors-policy.php>. For their own safety and protection, minors are not permitted to be or work in a laboratory/technical area alone. All minors who are participating in a University program or a program taking place on the University campus must be supervised by an authorized adult(s) at all times.