Title:	General Lab Safety Policy
Approved :	
Effective Date:	01/01/2015
Responsible Official:	Senior Director EHS
Responsible University Office:	Environmental Health and Safety
Revision History:	7/1/2022
Related Legislation and University Policy:	EPA, OSHA, NFPA, CDC, APHIS, NIOSH, NIH, FDA, ODH, NRC, etc
Review Period:	5 years
Last Review Date:	6/22/2022
Relates to:	All of CWRU Community

Purpose of Policy:

This Policy has been developed to:

Communicate University leadership's commitment to environmental health and safety efforts;

Assign key environmental health and safety responsibilities to the University community; and;

Foster accountability to support continuous improvement

These three factors are critical in supporting the University's commitment to organizational excellence and promoting a culture of safety.

General Statement

University leadership, at all levels, is committed to protecting the health and safety of all employees, students, visitors, and the environment. This is achieved through the continuous improvement of the university's culture of safety and environmental stewardship in support of advancements in the university's teaching, research, and service mission. The University considers no phase of its operations or administration more important than the well-being of our community. Leadership shall ensure that safe and healthy conditions are provided and shall always insist on safe work methods and practices.

All members of the community shall:

Comply with all training obligations as required by various regulatory requirements and maintain training and retraining current;

Maintain a positive safety culture and reinforce the importance and roles of safety and security;

Exercise due diligence and report situations that jeopardize the safety and security of themselves, the community, or any other aspect of the university;

Safeguard themselves against harm including using Engineering Controls and Personal Protective Equipment as well as utilizing less hazardous

Specific Assigned Responsibility for Laboratory Safety

Environmental Health and Safety

Environmental Health and Safety (EH&S) provides program support to assure a safe research work environment is maintained and regulatory compliance is achieved. **EHS is tasked with assuring that all EHS Federal, State, and Local regulatory obligations are met.** This is accomplished through inspections, training, expert guidance on safety related issues, and analysis of risk and mitigation strategies. EHS is charged with communicating hazards observed and assuring action is taken to resolve the issues found. EH&S also provides services such as hazardous waste disposal, radioactive waste removal, assistance with permits, and in field support for emergency response.

Laboratory Safety Committee

The Laboratory Safety Committee LSC is a faculty led group of advisors to the EHS department. They provide expert advice and guidance regarding laboratory safety and its impact in the laboratories. The Laboratory Safety Committee also reviews major incidents on campus and provides annual program auditing of the EHS programs. The composition of the committee has been expanded to encompass additional safety leaders at the staff level.

1. Establish and maintain a chairperson
2. Each member of the University Safety Council shall attend the regularly scheduled meetings and special meetings of the LSC
3. Review all employee accidents and incidents. Assist in the investigation of serious accidents, and other accidents or process safety incidents.
4. Provide annual auditing of EHS programs

Administrative Units

Vice President of Research

The vice president for research is responsible for directing the university's research mission. Through policies, procedures, and educational programs that support research, the vice president for research develops and implements research initiatives that establishes a culture of compliance.

The vice president for research ensures the compliance of all aspects of the research process, the safety and welfare of employees and research participants, and adherence to all governmental regulations and university and sponsoring agency policies and procedures governing the research process.

The vice chancellor for research works closely with the University Compliance Office, the Office of the General Counsel, Environmental Health and Safety, the Deans, and department heads to maintain accountability and to resolve issues of noncompliance

Provost

The Provost has responsibility for ensuring Schools prioritize safety and assure adequate resources are available to comply with Federal, State, and Local regulations. This includes assuring safety is budgeted for in programs and grants and supporting a positive safety culture. The Provost may be called upon to resolve issues at the PI, School, Dean level.

Deans

[illegible]

Department Chairs

Department Chairs and Unit Heads have direct responsibility for safety within their departments to assure that Federal, State, and Local regulatory obligations are meet and a positive safety culture is present. They are also responsible for space allocation and security in cooperation with the Deans office. The Chair also holds ultimate responsibility for safety in teaching laboratories. They may delegate authority for implementing sections of the program; however, this does not eliminate direct responsibility for the program.

The Department Chair is responsible to:

1) Appoint a department safety committee comprised of both faculty, staff, and students. This group should conduct annual or more frequent inspections and proactively report issues to the Chair for correction.

2) Support a positive culture of Safety

3) Receive an annual summary of safety inspections from EHS and ensure investigators follow up and complete findings

4) Work with EHS to ensure compliance when issues come up that either are not handled by the Primary Investigator or which require Department level assistance such as funding, notifications, shared spaced, unusual work arrangements, etc.

5) Plan for and establish onboarding and offboarding procedures for faculty, students, visiting

SUPERVISORS

1. All supervisors (department chairs, faculty, and other employees with direct oversight of University activities and employees or students) have specific responsibilities to provide for the health and safety of those supervised. They are in a key position in the organizational structure to carry out the department's safety policies and to prevent injuries to their employees.
2. Be thoroughly informed of appropriate University and Departmental safety policies, rules and procedures and how they specifically apply to their responsibilities and authority.
3. Inform all new and current employees and students that safety and health, and concern for the environment, are priorities at Case Western Reserve University and to inform them about safety and health policies, rules, regulations, and procedures, as well as their specific responsibilities.
4. Ensure that required safety equipment, devices and personal protective equipment and apparel are provided and maintained and are properly used by individuals working in their operations.
5. Provide employees and students with instruction and assistance in the proper operation of equipment, materials, or processes involved in any operation which may be potentially hazardous.
6. Take prompt corrective action when unsafe conditions, practices or equipment are reported or observed.
7. Encourage prompt reporting of health and safety concerns.
8. Promptly conduct a thorough investigation in all work-related injuries, illnesses, accidents, and process safety incidents, submit appropriate recommendations on all accident reports, as appropriate, and follow through to ensure corrective measures have been implemented.
9. Coordinate or conduct inspections to maintain safe and healthful conditions and address any deficiencies that are identified.
10. Provide for health and safety training both through EHS and locally.
11. Provide financial support for health and safety improvements, or request assistance from the next higher level of supervision regarding these requests.

Primary Investigator Responsibilities

Training/Retraining

Safety Training is the primary method used to communicate hazards to the worker and explain how they are expected to work and what means and methods they are to use to remain safe.

1) All workers and PIs must complete general EHS safety training annually and prior to starting work.
   A) There is an initial class required prior to the start of work that is given in person or over zoom
   B) There is an annual retraining required given on canvas.case.edu
2) All PIs must deliver laboratory specific training detailing the CHP/ECP as described under plans and document this training with an outline of the training and a sign in sheet. This must be done prior to starting any work and renewed annually. This is critical to compliance.

Inventories

Every laboratory must have a complete Chemical, Biological, and Radiological inventory. The inventory must be a part of the CHP/ECP. The inventory should be kept in an electronic spreadsheet.

Hazardous Waste removal

PIs shall assure that chemical, biological, and radiological waste is disposed of through the EHS Hazardous Waste system regularly and consistently. Materials no longer in use at the end of project should be disposed of within one year of the conclusion of a project. Failure to do so shall mean that the cost for disposal of these materials shall shift from the Hazardous Waste program to the PI, Department, and School. The CWRU Hazardous Waste program only covers materials from active research. See the Hazardous Waste section of the EHS website for more detail.

Purchasing Chemicals, Biologicals, Radiologicals, Drugs

All research materials must be purchased with a PO/REQ. Credit cards are not allowed.

Emergency Information

Every laboratory must have an up-to-date emergency contact sign on the entrances to the laboratory. The PI is the primary contact

1) A reachable number is required. Do not list your office or Dispatch.
2) The information must be immediately updated if there is a change
3) The person answering must be fully familiar with the operations of the laboratory and be able to aid responders in understanding the status of the laboratory and any work being done. They must also be available to come to the laboratory

Laboratory Worker Responsibilities

Laboratory workers must not continue an experiment if they feel unsafe or unsure of the work or outcome (STOP!) Laboratory workers have the right to stop work if they feel unsafe.

Laboratory workers must not modify or scale up experiments without prior authorization from the PI

Laboratory workers must not conduct unauthorized experiments or personal projects

Laboratory Workers must follow safety protocols listed in the CHP and ECP plans as written. Consult the PI before making changes.

1. All University employees and students have specific responsibilities to comply with established health and safety policies, standards, rules, procedures, and regulations. Compliance with these is essential to create and maintain a healthy and safe environment at all University locations.
2. Comply with applicable environmental health and safety policies, standards, rules, regulations, and procedures. These include safety-related signs, posters, warnings, and written/oral directions when performing tasks.
3. Do not perform any function or operation which is considered hazardous or is known to be hazardous without proper instructions and authorization.
4. Only use equipment and materials approved or provided by the supervisor or instructor and for which instruction has been provided by this or other experience.
5. Become thoroughly knowledgeable about potential hazards associated with the work area; knowing where information on these hazards is maintained and how to use this information when needed.
6.

10. All laboratory workers must complete initial OSHA Lab Standard training plus specialty classes as required such as Biohazard, Radiation, Laser, shipping, or other specialty courses. This must be completed prior to starting work. An annual retraining is required. Further lab specific training in the CHP/ECP plans must be completed prior to starting work. This training is provided by the PI. Annual retraining is required for all courses.

11. All Clinical workers such as the Dental School clinic workers and University Health Services must complete Hazard Communication training and Biohazard training prior to work. There is an annual retraining required for each of these classes

12. Medical, Dental, and Nursing students receive initial training through their orientation. Annually retraining is on canvas. The course covers Lab Standard, Hazard Communication, Biosafety//BBP, and Ancillary Radiation. Other specialty courses may be required. Annual retraining is required and covered on canvas.

13. Laboratory workers must utilize appropriate PPE and clothing and must not reuse disposable PPE

14. FOOD, DRINK, COSMENTIC are prohibited. Refer to the CHP/ECP and Lab Safety Manuals for additional details.

REFERENCES:

EHS Website
www.case.edu/EHS

EHS Contact Information
Biological/Chemical 216 368 2907
Radiological 216 368 2906

Safety Culture
https://www.osha.gov/laboratories

Index of General Industry Standards
https://www.osha.gov/laws-regs/regulations/standardnumber/1910
https://www.osha.gov/a-z

Basic Standards

Biohazards
https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.1030
Laboratory Safety
https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.1450
Chemical Hygiene Plans
https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.1450AppA
Hazard Communication
https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.1200

Definitions:

Ethical Behavior- Acting in a manner consistent with society's expectations and laws

Positive Safety Culture-A social culture where the safety of the worker, the