# COLORADOSCHOOLOFMINES

# Laboratory Safety and Environmental Health Assessment Program

Principal Investigators and Faculty are vital to the success of safety and environmental compliance programs in Colorado School of Mines research and teaching laboratories. Principal Investigators and Faculty are responsible for ensuring safe operating procedures, and providing training and supervision to students and lab workers. They must ensure research activities are designed and conducted in a manner that makes safety a priority and follows applicable environmental health standards and policies.

The Environmental Health and Safety Department (EHS) strives to support the core research and teaching mission of Mines. Comprehensive laboratory evaluations help ensure that work within campus laboratories is occurring safely and in compliance with applicable laws, guidelines and Mines Policies. This Program is intended to promote safety in laboratory activities and aid Principal Investigators and Faculty with laboratory safety and environmental protection responsibilities.

This Laboratory Assessment Program identifies four processes to evaluate safety and environmental health programs and includes:

- 1. Laboratory Self-Inspections
- 2. EHS Assessment Activities
- 3. Results and Corrective Measures
- 4. Laboratory Assessment Program Review

# Laboratory Self-Inspections

Properly conducted self-inspections assure safe working conditions and compliance with environmental regulations. Lab personnel should look at all areas and address safety and environmental compliance concerns they identify. Individual laboratories may request assistance with laboratory inspection procedures from EHS personnel.

Laboratory self-inspections should be conducted by Principal Investigators, Faculty or a representative of a laboratory appointed by the Principal Investigator. At a minimum, EHS recommends conducting inspections at the beginning of each semester. This schedule gives new laboratory personnel an opportunity to participate in the self-inspection process and become familiar with safety and environmental compliance issues specific to the laboratory location.

The Laboratory Assessment Checklist included in this Program in Appendix A may be followed for self-inspections. The checklist is divided into three sections and includes:

- Environmental Health Assessment,
- Chemical Hygiene Assessment, and
- Fire/Life Safety Assessment.



A comprehensive laboratory self-inspection must consider all sections of this checklist. The required weekly inspection of laboratory waste storage areas addresses only the Waste Handling Section of the Environmental Health Assessment.

Specific lab locations may have an existing checklist for specific safety or environmental compliance issues that are not included in this checklist. These labs should work with EHS to modify an assessment checklist that best addresses specific safety and environmental compliance needs. Examples may include a checklist for a laboratory housing radioactive materials, radiation producing equipment or lasers.

# **EHS** Assessment Activities

EHS assessment activities may occur for any of the following reasons:

- As requested by a Principal Investigator, Research Faculty or lab personnel;
- Part of a routine annual inspection program;
- A mandatory investigation following a reported laboratory <u>Safety Concern</u>;
- Part of an accident investigation; or
- To collect information following a regulatory agency inspection.

EHS will use the Laboratory Assessment Checklist included in this Program in Appendix A to standardize the inspection process. These completed checklists will be maintained in EHS files so past assessment activities may be easily compared to current assessment results. The goal is to identify and eliminate recurring environmental compliance and safety issues. EHS will also develop a tracking program to measure the number and type of environmental compliance and safety concerns campus wide.

During the assessment, EHS will work with the Principal Investigator, Faculty, or laboratory personnel to address and correct safety and environmental compliance issues that can be corrected at the time of the assessment. If safety and environmental compliance issues cannot be adequately addressed during the lab visit, EHS will prepare a written assessment report and recommended corrective measures for the Principal Investigator and Department Head. See the Results and Corrective Measures section of this Program for specific notification procedures.

The Department Head will be notified in advance of the EHS laboratory visit and assessment activities. Department Heads are encouraged to announce the schedule to their department personnel and have them conduct self-inspections. Appendix B contains a sample of the routine annual inspection notice.

# **Results and Corrective Measures**

Assessment results will be communicated to the Principle Investigator and the Academic Department Head. Results will be summarized using the following ratings.

• Requires Immediate Attention - Safety or environmental compliance issues exist that could immediately cause injury, fire, impact the heath of laboratory personnel, or result in a violation by a regulatory agency.



- Requires Corrective Actions Safety or environmental compliance issues exist but do not pose an immediate threat, but must be repaired in a timely manner.
- Meets Expectations Safety or environmental compliance issues identified and corrected during inspection process.
- Excellent No Safety or environmental compliance issues identified.

Laboratories that implement a regularly scheduled, comprehensive self-inspection program should easily achieve an assessment summary rating of excellent or Meets Expectations.

Laboratories having safety or environmental compliance issues requiring immediate attention will be identified to the Principal Investigator and the Academic Department Head in a memo from EHS. The memo will identify the specific items that require immediate attention and guidelines to eliminate or repair the safety or environmental compliance concern. The completed Laboratory Assessment Checklist will be attached to the memo.

The cost to eliminate safety and environmental compliance issues is the responsibility of the academic department. In some cases, EHS may assist by using available EHS funds as well as working with vendors to obtain appropriate equipment and price quotes to repair and eliminate the identified concerns. Requested for funding assistance may be submitted to the Senior Vice President of Finance and Administration.

The Senior Vice President of Finance and Administration will be notified of unresolved safety and environmental compliance issues. Reports of close calls and near miss incidents are reported to the Mines Executive Committee.

Laboratories having safety and environmental compliance issues that require corrective actions will be identified to the Principal Investigator by e-mail communication. A summary of the assessment results will be provided along with recommended corrective actions and a schedule to eliminate the safety and environmental compliance concerns.

Targeted re-inspections will be completed to ensure the lab qualifies for a meets expectations rating. Failure to address safety or environmental compliance issues in a lab space will be managed on a case by case basis.

Laboratories that achieve a rating of Excellent or Meets Expectations will be reviewed by the Campus Safety Committee and recommendations will be made to the Provost to recognize the Principal Investigator and the laboratory personnel.

# Laboratory Assessment Program Review

The Laboratory Assessment Checklist will need to be revised as problem areas are identified or as changes in regulations occur. The records of EHS assessment reports and completed assessment checklists will be maintained electronically and in a dedicated file. These records should be maintained so trends and program improvements may be implemented.

# Appendix A

Environmental Health and Safety Laboratory Assessment Checklist



# Environmental Health and Safety Environmental Health Laboratory Assessment

РІ:	Department:
Lab Contact:	Lab Phone:
Building:	Room:
Inspected By:	Date:

#### **Inspection Finding Categories:**

- A. No items of safety or environmental concerns were identified.
- B. Items of safety or environmental concerns were identified.
- C. Uncorrected repeated safety or environmental items were identified.

#### **Signs and Labels**

Category	Item	Comments (description, location, etc.)
	Lab refrigerators/freezers/microwaves labeled:	
	🗌 "No Food"	
	"No Flammables" (unless a flammable	
	rated refrigerator is present)	
	Restricted areas are identified and secure.	
	Emergency contact information sign is posted	
	on outside of lab door.	
	Hazardous Materials Emergency Information	
	poster from EHS posted.	
	Appropriate Signs on lab entrance:	
	Caution – Radioactive Materials	
	Biohazard Symbols	
	Lasers	
	There are no signs present indicating hazards	
	that no longer exist.	

Training		# Compliance Items:
Category	Item	Comments (description, location, etc.)
	Persons handling and generating hazardous waste are current on annual training.	List of personnel:
	Persons working with BBP are current on annual training.	List of personnel:
	On-the-job training completed (lab specific training).	

Personal F	Protective Equipment (PPE)	# Compliance Items:
Category	Item	Comments (description, location, etc.)
	Proper PPE available and matched to hazards: Gloves Lab Coates Safety Glasses/Goggles Face Shields Respirators	
	Proper lab attire (no open toed shoes etc.).	
	Proper respirator use (if applicable).	

Laboratory Work Practices

Category	Item	Comments (description, location, etc.)
	Gloves are removed before exiting lab.	
	Smoking and consumption of food and	
	beverage in the lab are prohibited.	
	Food and beverages are not stored in	
	laboratory areas.	
	Mouth pipetting prohibited.	
	Used needles/sharps are stored in appropriate	
	sharps containers.	
	Fume hood or glove box is used for handling	
	hazardous materials.	
	Vision panel in door to lab is free from	
	obstruction.	

Waste Handling		# Compliance Items:
Category	Item	Comments (description, location, etc.)
	No waste is disposed in the trash, sinks, or by	
	evaporation.	
	Pink waste tags are affixed to each waste	
	container when waste first introduced.	
	Wastes submitted to EHS, within 6 months	
	after date of first filling of container.	
	Waste containers are in good condition and:	
	Free of leaks	
	Labeled	
	Segregated	
	Satellite Accumulation Area Requirements:	
	Labels Complete	
	Identify Constituents and Concentrations	
	Segregation for incompatibles	
	Any special waste (biological, radioactive) is	
	properly marked with special labeling.	
	Incompatibles not mixed together.	
	Generator does not treat chemical waste in	
	lab.	

### Biosafety

Category	Item	Comments (description, location, etc.)
	Point of use containers available for biomedical wastes at the benches	
	Sharps containers available and not overfilled.	
	Sharps are handled appropriately: <ul> <li>no re-capping needles</li> <li>no bending or breaking needles</li> </ul>	
	Proper decontamination methods used (10% bleach or other EPA approved decontamination solution.	
	Biomedical waste containers do not contain non-biomed waste (trash chemicals, etc.).	

Radiation	Safety	# Compliance Items:
Category	Item	Comments (description, location, etc.)
	Radioactive materials are properly labeled and stored.	
	For ongoing projects, containers of radioactive materials are: properly labeled sealed with secondary containment (as needed)	
	Personal dosimeters and area dosimeter are current	
	Copy of lab safety procedures for handling radioactive materials is available in the lab.	
	Users of radiation have been properly trained on radiation safety.	
	For analytical X-ray equipment, the state inspection is current (the blue sticker	
	For analytical X-ray equipment, the interlock and warning devices are in working condition.	

#### Additional Comments / Recommend Items

# Environmental Health and Safety Chemical Hygiene Laboratory Assessment

PI:	Department:
Lab Contact:	Lab Phone:
Building:	Room:
Inspected By:	Date:

#### **Inspection Finding Categories:**

- A. No items of safety or environmental concerns were identified.
- B. Items of safety or environmental concerns were identified.
- C. Uncorrected repeated safety or environmental items were identified

#### Compressed Gas Cylinders / Distribution Systems

Category	Item	Comments (description, location, etc.)
	Unsecured cylinder	
	Cylinder cap in place when not in use or when	
	being moved.	
	Regulator mounted on cylinder not in use	
	Cylinders in use or storage are secured in	
	upright position	
	Incompatibles separated.	
	Hoses, tubing and regulators are in good	
	working condition:	
	Cracks, leaks, damage	
	plastic tubing for flammable gases	
	Proper and intact labels.	
	Transportation in cylinder cart.	
	Excessive amount of flammable gases	
	Excessive amount of oxidizing gases	
	Excessive amount of toxic gases	

General Appearances / Housekeeping		# Compliance Items:
Category	Item	Comments (description, location, etc.)
	Unobstructed Egress.	
	Empty chemical containers.	
	Workspace clutter and free of	
	contamination.	
	Trash bins.	

Chemical	Fume Hoods / Exhaust Points	# Compliance Items:
Category	Item	Comments (description, location, etc.)
	Over-crowded.	
	Low flow or airflow blocked or restricted.	
	Performance check within last 12 months.	
	Sash open during use or unattended.	

Reagent and Sample Storage		# Compliance Items:
Category	Item	Comments (description, location, etc.)
	Secondary containment used properly.	
	Incompatibles stored together: Acids and bases Acids and cyanides, sulfides or bleach Oxidizers and flammables Waster reactive and aqueous Organic and Concentrated acids Bleach and ammonium hydroxide	
	Degraded and expired containers.	
	Containers properly labeled and intact.	
	Flammable Liquid Storage: 5 gal. or larger stored in flammable liquid storage cabinet No more than 10 gal. stored outside of flammable liquid storage cabinet	
	Chemical spills (unattended)	
	Refrigerators: Flammable materials Cluttered	

Safety Data Sheets		# Compliance Items:
Category	Item	Comments (description, location, etc.)
	Hardcopies not available	
	No access to Internet / MSDS's	

Additional Comments / Recommend Items



# Environmental Health and Safety Fire and Life Safety Laboratory Assessment

PI:	Department:
Lab Contact:	Lab Phone:
Building:	Room:
Inspected By:	Date:

#### **Inspection Finding Categories:**

- A. No items of safety or environmental concerns were identified.
- B. Items of safety or environmental concerns were identified.
- C. Uncorrected repeated safety or environmental items were identified.

#### Safety Equipment

Category	Item	Comments (description, location, etc.)
	Fire extinguishers are clearly visible and have	
	unobstructed access.	
	Emergency eyewashes and showers are in	
	good condition, clearly visible and have	
	unobstructed access.	
	Emergency shower sprays will not contact	
	electrical wiring or equipment.	
	Machine guards for hazards such as chain	
	drives, belt drives, rotating shafts and pinch	
	points are in place.	
	Emergency telephones are clearly visible and	
	have unobstructed access.	
	Emergency shut-offs (ventilation, electrical	
	and gas) are clearly visible and have	
	unobstructed access.	
	First aid kits are clearly visible, unobstructed	
	and well stocked.	

Electrical Safety		# Compliance Items:
Category	Item	Comments (description, location, etc.)
	All power cords and plugs are undamaged and	
	in good condition	
	All extension cords and power strips are	
	plugged directly into building electrical outlets.	
	Only extension cords with 3-prong plugs	
	(grounded) are in use.	
	Extension cords are only used to power a	
	single piece of equipment (unless	
	manufactured with multiple outlets).	
	The current rating of all extension cords	
	exceeds the combined maximum current draw	
	of the equipment powered by them.	
	Extension cords are only used on a short-term	
	basis and not as an alternative to installing	
	additional building power outlets. (Cords	
	attached to walls, benches, ceilings, etc. are	
	evidence of long-term usage.)	
	All electrical equipment is properly grounded.	
	Manufactured electrical equipment (including	
	extension cords) has not been modified from	
	its original condition and is only being used in	
	a manner intended by the manufacturer.	
	All power cords on the floor in travel paths are	
	domogo	
	Udilidge.	
	above collings under floor coverings, through	
	holes in walls or in any other manner that	
	might expose them to damage	
	Power supply or other high voltage	
	connections are made using wire nuts and	
	enclosed in junction boxes.	
	There is at least 36 in. (wide and deep) of clear	
	floor space in front of all electrical panels.	
	There are no exposed energized elements	
	(excluding data or other low voltage wiring).	

Fire Safety / Life Safety		# Compliance Items:
Category	Item	Comments (description, location, etc.)
	All aisles are unobstructed and at least 30 in.	
	in width.	
	Both primary and secondary exits are	
	unobstructed.	
	There is no combustible storage within 24 in.	
	of the ceiling (18 in. if fire sprinklers are	
	present.	
	Fire rated doors (self-closing, solid core or	
	metal doors with no window or wired glass	
	window, and no vents) are not propped open.	
	Fire sprinkler spray patterns are not blocked	
	by equipment or furnishings.	
	Emergency shut-down procedures are posted	
	for any equipment that cannot safely be left in	
	operation, unattended.	
	Space heaters are not located near	
	combustible materials and are unplugged	
	when not attended.	
	There are no unprotected pointed, sharp, hot	
	or otherwise hazardous objects next to travel	
	paths that might be accidently contacted by	
	personnel.	
	Signage or warning lights for emergency	
	equipment is clearly visible (including exit	
	signs)	

#### Additional Comments / Recommend Items

# Appendix B

**Routine Annual Laboratory Assessment Notification** 



# **ENVIRONMENTAL HEALTH & SAFETY DEPARTMENT**

Date:

**To:** [Insert Department Head]

From: [Insert Assessment Supervisor's name], Coordinator

Subject: Laboratory Safety and Environmental Health Assessment

The Environmental Health and Safety Department will be assessing safety and compliance with environmental health programs in campus research and teaching laboratories. The assessment activities will include the following:

- A review of current laboratory conditions,
- Identification of potential safety issues,
- Identification of environmental health program compliance issues, and
- A report to the Principal Investigator and the Department Head identifying safety and environmental compliance issues.

The goals of these assessment activities are to promote safety in laboratory activities and aid Principal Investigators with laboratory safety and environmental health program responsibilities.

A copy of the Laboratory Safety and Environmental Health Assessment Program is available on the EHS Web Page. Appendix A of this Program contains the checklist EHS personnel will use during the laboratory visit. Departments and individual laboratories are encouraged to implement a self-inspection process described in this Program.

Department Heads are free to notify their department of the scheduled assessment activities. Please pass this notification along to Principal Investigators, Research Faculty and laboratory personnel.

*[insert department name and location]* laboratory assessments will begin on *[insert date and time.]* Feel free to contact me with any questions that you may have about the Laboratory Safety and Environmental Health Assessment Program.