



Safety and Risk Management

Laboratory and Research Support Programs Information Paper (PI Orientation)

The Office of Environmental Health and Safety (OEHS), which is under VCU's Department of Safety and Risk Management, is located in Sanger Hall (Basement Level 2) and in the VMI Building (Suite 107). OEHS is the university's sponsor for many programs which directly support the research effort at Virginia Commonwealth University. The SRM website (srm.vcu.edu) contains information regarding our programs, forms, and institutional requirements. Functionally, OEHS consists of two sections: Chemical and Biological Safety Section (CBSS) and Radiation Safety Section. The CBSS also contains the university Biological Safety Office. While each section manages an extensive and comprehensive array of programs, this information paper addresses specifically the Chemical and Biological Safety Office role in supporting university research programs and is intended to familiarize you with our programs.

Chemical and Biological Safety Sections consists of professionals who specialize in industrial hygiene, biosafety, laboratory safety, and hazardous waste management. As our name and composition implies, we manage those aspects of university research which are essential for continued compliance with requirements from governmental regulators, grantors, and credentialing agencies. Perhaps our biggest challenge in pursuing our mission is keeping track of researchers and building/laboratory assignments. This is a highly dynamic situation subject to frequent change. For this reason, we request that all incoming researchers complete and forward to CBSS a Notice of Laboratory Occupancy so that we can add you to our database and ensure we provide you the services you need. Additionally, we have two other forms which you may need to use from time to time: Laboratory Relocation and Laboratory Closeout. As the names imply, these forms should be used to inform CBSS when you change locations within the university or close out your lab and cease operations. In the event of a laboratory closure, we request three months advance notice of the actual closure so we can assist you in disposing of hazardous materials, etc.

Specific programs are detailed briefly below:

A. Select Agent Declaration. Select agents are those biological agents and/or toxins that pose a potential threat to public health and safety and for this reason are regulated by federal law and university policy. If you contemplate using select agents, you must register with the Biosafety Office prior to receiving or bringing select agents into the university. Failure to do so can lead to federal prosecution.

B. Dual Use Research of Concern. Dual Use Research of Concern (DURC) is life sciences research that, based on current understanding, can be reasonably anticipated to provide knowledge, information, products, or technologies that could be directly misapplied to pose a significant threat, with broad potential consequences, to public health and safety, agricultural crops and other plants, animals, the environment, materiel, or national security. For information on the fifteen (15) DURC agents and seven



Safety and Risk Management

(7) experimental effects of concern, contact the Senior Associate Vice President, Research Administration and Compliance.

C. VCU Personal Protective Equipment Assessment Form. The federal Occupational Safety and Health Act requires that employers assess jobs their employees are expected to complete and require personal protective equipment where unabated hazards exist. The university has developed a form for your use in completing this requirement. You should complete a form for each person whom you supervise and maintain it in your laboratory. The "VCU Personal Protective Equipment Assessment" forms should be reviewed annually or as required and re-signed.

D. Workers' Right to Know. Workers' Right to Know (WRTK) forms should be completed for each person you supervise. The university has developed a form for your use in completing this requirement. Please note, there are separate forms for the university and the Health System. The original WRTK form should be maintained in your laboratory for University employees.

E. Environmental Permitting. Installation of certain equipment, notably ethylene oxide sterilizers, requires state air pollution permits. If you are contemplating installing such equipment or perhaps other devices which might be regulated, beginning the permit request process early can avoid significant delays in your research. Please contact the CBSS office for assistance with this process.

F. Hazardous Waste Disposal. Management of hazardous wastes is regulated by federal law which contains specific requirements for documentation, transportation, storage, disposal, and documentation. It is a violation of federal law to manage hazardous wastes in a manner inconsistent with the VCU hazardous waste disposal program. CBSS accepts chemical waste by appointment on Tuesday and Thursday mornings. A chemical waste appointment can be scheduled by using this link: [Chem Waste Appointment](#). The VCU hazardous waste disposal program is described in detail on the SRM website. We recommend researchers review this site to become familiar with university waste disposal procedures and processes. In particular, there are disposal costs which must be borne by the researcher and foreknowledge of these may reduce your operating costs. The university, as well as your laboratory, is subject to regulatory inspection by the Virginia Department of Environmental Quality. For this reason, we conduct annual assessments of your laboratory hazardous waste management practices. During these inspections we will inspect the laboratory's Satellite Accumulation Area (SAA) to ensure it is properly established and maintained.

G. Laboratory Safety Program. Each researcher is required to develop a laboratory specific safety program. This includes establishing and maintaining a laboratory Chemical Hygiene Plan (CHP), chemical inventory, Safety Data Sheets (SDS) for hazardous chemicals, and proper labeling and/or hazard warnings. In addition, if biohazards are present in the laboratory, a Biosafety Manual and/or Exposure Control Plan will need to be established and maintained. The contents and components of this program, including the VCU CHP, can be found on the SRM web site. Please keep in mind the CHP available through OEHS is a template that needs to be filled out and customized to reflect the laboratory's characteristics and procedures. The laboratory safety program should be reviewed at least annually and updated as required.



Safety and Risk Management

H. Annual Laboratory Safety Evaluation. University policy requires that each laboratory be evaluated annually. During the inspection, the laboratory safety program (including the CHP, chemical inventory, SDS's, employee training records, and Biosafety Manual/Exposure Control Plan, if applicable) will be reviewed and evaluated. Other items that will be evaluated include the proper use of personal protective equipment, proper chemical segregation and storage, and physical hazards, among others. Following an inspection, you or your laboratory manager will be briefed on the findings of the evaluation.

Subsequently, you will receive a memorandum from CBSS requesting that you formally reply with your actions to address findings and shortcomings. Please note that a reply to the laboratory safety findings is required. We will work closely with you to fully resolve findings. In addition to laboratory safety evaluations, we also conduct fume hood and hazardous waste collection (SAA) assessments, which are managed as above.

I. Laboratory Signage. All laboratories must have signs indicating hazards within the laboratory. Create specific signage by downloading the Lab Signage document located on the SRM web site. The sign is in MS Word format so it can be edited directly when downloaded allowing you to post signage or modify signage quickly and easily. In addition, all biosafety level 1 and above designated laboratories must also display a biohazard sign at the laboratory entrance when biohazards are present in the laboratory.

J. Emergency Notification. To facilitate after-hours contact and emergency response should a crisis develop in your laboratory, in addition to the contact information contained on the laboratory sign mentioned above, researchers and laboratory managers are required to include emergency contact information in the "Personal Information" section of the Human Resources Division Employee Self Service web site. Please ensure this information remains up to date.

K. Laboratory Safety Training Modules. All laboratory workers must be trained. To assist researchers in meeting this requirement, CBSS has developed laboratory safety training modules which are available on Blackboard. The Blackboard training is general safety training and is intended to supplement, not replace, laboratory specific training provided by the PI, lab supervisor / manager. Every person working in the lab is required to complete the Core Laboratory Safety training module on Blackboard. Any additional Blackboard training assignment is at the PI's discretion. Upon completion of the correlated examination, the quiz results must be printed and retained in the lab's Chemical Hygiene Plan as proof of training. Training records will be reviewed during the laboratory's annual inspection.

L. Biological Safety Cabinets (BSC). OEHS does not certify BSC for the university; this is a researcher's responsibility. Since the university accepts National Institutes of Health rDNA grant funds, the university as a whole has accepted the requirement that BSCs utilized in rDNA research be certified annually. Please contact CBSS regarding contact information for certified biological safety cabinet inspectors within the commuting area.

M. Handling Dangerous Goods. If you or your staff ship dangerous goods as defined by the U.S. Department of Transportation, you must have received training within the last two years and hold a



Safety and Risk Management

certificate of proficiency issued not more than two years ago. There are federal penalties for failure to comply with the dangerous goods shipping regulations. For your convenience, we routinely offer instructor-led training. The training schedule is posted on the SRM web site and announced in the VCU TelegRAM. Registration for instructor-led training is not required.

N. Needle Recapping. Recapping of needles and other sharps is prohibited. Given that some procedures require the recapping of needles, we have developed a waiver form which will permit recapping when, in the opinion of the Biosafety Officer, such recapping is warranted. The waiver request can be found on our web site.